



Friends of Carrington Moss

Places for Everyone Response

Executive Summary

The Friends of Carrington Moss (FOCM) are a local community group urging the retention, preservation and restoration of the area known as Carrington Moss, the second largest peat moss in GM. Our campaign has been positive and collaborative and we have engaged with a wide range of stakeholders since our formation in 2017.

We wholeheartedly support a regional plan and recognise the amount of effort that has been spent developing these documents. We welcome many of the Policies and acknowledge that a lot of information has been made available as part of the production of this Plan.

We must also mention though, that we do have concerns and we do believe there are some huge gaps in the evidence needed, particularly in order to make decisions about the release of green belt for development.

We have attempted to engage fully with the plan-making process since we became aware of the GMSF (which was not until the local landowner put up 'Trespassers will' signage on local footpaths). We were not aware of the consultation in 2015 about the Growth and Spatial Options, nor were we made aware of the first GMSF consultation in 2016.

Despite our best efforts, we have not been able to secure access to the information we have asked for, nor have our requests for workshops been responded to.

As a consequence, we have worked with other local community groups and Parish Councils to develop alternative options to those set out in the Greater Manchester Spatial Framework (GMSF), now known as Places for Everyone (P4E). During this process, we designed and delivered three workshops, which have included participants from the Council, landowners, developers, specialist groups and local experts. These workshops focused on the Ecology and Biodiversity on Carrington Moss, Interconnected Traffic-Free Routes across Carrington Moss and Air Quality in this area.

We hope our response to this Regulation 19 consultation will be considered to be constructive and positive. It has been compiled by Marj Powner (Chair), with support from other members of our group. We would like the opportunity to attend and speak at the hearing, supported by specialists or consultants, where required.

Summary of our Key Concerns:

FOCM is not anti-development, but we do believe housing and employment should be sited in the most sustainable locations, with brownfield land being prioritised before any further green belt is released.

Our biggest concern is that the climate emergency has not been placed at the forefront of this Plan.

The climate emergency is not the key theme running through all the Policies, nor has it been considered as the primary factor in making decisions about whether the Growth and Spatial Options strategy is appropriate and whether green belt should be released.

In addition, we raise concerns in our responses about the following:

- the lack of genuine engagement and consultation with residents, particularly those in the younger generation, who will be facing the consequences of this Plan, nor those in the older generation, who may find it difficult to access all the material online



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- the sheer volume of documents has been totally off-putting to many potential respondents, some of whom are our most vulnerable residents, many of whom will be directly impacted by the Plan but feel totally excluded from the process
- the omission of consideration for the rural communities in GM, the rural economy and the potential growth of rural businesses or ecosystem services
- the huge increases in air, noise and light pollution that will be a direct consequence of the Plan, particularly in the Allocation areas, impacting the health and wellbeing of GM citizens
- the housing and employment land supply and the planned volumes for development
- the credibility of the Plan to deliver sufficient housing for social or affordable rent to meet GM's need, particularly given the viability of some of the developments
- the misunderstandings or misleading statements about whether the Plan leads to a sustainable future for GM
- the lack of protection for our natural capital and ecosystem services, our climate mitigating capabilities, the best and most versatile agricultural land, irreplaceable habitats and the populations of red listed birds and endangered wildlife as a consequence of the Allocations not respecting or complying with the Policies set out in the Plan.

We are, of course, very concerned about the release of 2,430 hectares of green belt, the equivalent of land the size of 3,400 football pitches.

Our Requested Modifications

With all the above in mind, we believe the Plan fails to meet the four tests of soundness. We have set out our suggested modifications in each response but in general, we believe the lack of compliance with the Policies makes the Allocations unsound and undeliverable. They should, therefore, be withdrawn from this Plan and handled through the Local Plan process, following robust engagement with residents and their representatives. We also believe there should be a comprehensive review of housing and employment land supply and local brownfield registers, again, in collaboration with local citizens, prior to any decision to release green belt, which we consider to be premature and unnecessary.

Furthermore, we request that in addressing the potential modifications, the Planning Inspector also considers the points we raise about the regulatory requirements and whether these have been adhered to.

Submission

The Friends of Carrington Moss held a public meeting on Tuesday 28th September 2021. During that meeting participants confirmed agreement for this submission to be made on the group's behalf.



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Vision

[Q18 Our Vision](#)

[Q19 Strategic Objectives](#)

Strategy

[Q20 Our Spatial Strategy](#)

[Q21 Policy JP-Strat 1 Core Growth Area](#)

[Q22 Policy JP-Strat 2 City Centre](#)

[Q23 Policy JP-Strat 3 The Quays](#)

[Q24 Policy JP-Strat 4 Port Salford](#)

[Q25 Policy JP-Strat 5 Inner Area Regeneration](#)

[Q26 Policy JP-Strat 6 Boosting Northern Competitiveness](#)

[Q27 Policy JP-Strat 7 North East Growth Corridor](#)

[Q28 Policy JP-Strat 8 Wigan-Bolton Growth Corridor](#)

[Q29 Policy JP-Strat 9 Sustaining Southern Competitiveness](#)

[Q30 Policy JP-Strat 10 Manchester Airport](#)

[Q31 Policy JP-Strat 11 New Carrington](#)

[Q32 Policy JP-Strat 12 Main Town Centres](#)

[Q33 Policy JP-Strat 13 Strategic Green Infrastructure](#)

[Q34 Policy JP-Strat 14 A Sustainable and Integrated Transport Network](#)

Sustainable and Resilient Places

[Q35 Policy JP-S 1 Sustainable Development](#)

[Q36 Policy JP-S 2 Carbon and Energy](#)

[Q37 Policy JP-S 3 Heat and Energy Networks](#)

[Q38 Policy JP-S 4 Resilience](#)

[Q39 Policy JP-S 5 Flood risk and the water environment](#)

[Q40 Policy JP-S 6 Clean Air](#)

[Q41 Policy JP-S 7 Resource Efficiency](#)

Places for Jobs

[Q42 Policy JP-J 1 Supporting long-term economic growth](#)

[Q43 Policy JP-J 2 Employment Sites and Premises](#)

[Q44 Policy JP-J 3 Office Development](#)

[Q45 Policy JP-J 4 Industry and Warehousing Development](#)

Places for Homes

[Q46 Policy JP-H 1 Scale, Distribution and Phasing of New Housing Development](#)

[Q47 Policy JP-H 2 Affordability of new housing](#)

[Q48 Policy JP-H 3 Type, size and design of new housing](#)



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[Q49 Policy JP-H 4 Density of new housing](#)

Greener Places

[Q50 Policy JP-G 1 Valuing important landscapes](#)

[Q51 Policy JP-G 2 Green Infrastructure network](#)

[Q52 Policy JP-G 3 River valleys and waterways](#)

[Q53 Policy JP-G 4 Lowland wetlands and mosslands](#)

[Q54 Policy JP-G 5 Uplands](#)

[Q55 Policy JP-G 6 Urban Green Space](#)

[Q56 Policy JP-G 7 Trees and woodland](#)

[Q57 Policy JP-G 8 Standards for greener places](#)

[Q58 Policy JP-G 9 A Net Enhancement of Biodiversity and Geodiversity](#)

[Q59 Policy JP-G 10 The Green Belt](#)

[Q60 Policy JP-G 11 Safeguarded land](#)

Places for People

[Q61 Policy JP-P 1 Sustainable Places](#)

[Q62 Policy JP-P 2 Heritage](#)

[Q63 Policy JP-P 3 Cultural Facilities](#)

[Q64 Policy JP-P 4 New retail and leisure uses in town centres](#)

[Q65 Policy JP-P 5 Education, skills and knowledge](#)

[Q66 Policy JP-P 6 Health](#)

[Q67 Policy JP-P 7 Sport and recreation](#)

Connected Places

[Q68 Policy JP-C 1 An integrated network](#)

[Q69 Policy JP-C 2 Digital connectivity](#)

[Q70 Policy JP-C 3 Our public transport](#)

[Q71 Policy JP-C 4 Streets for all](#)

[Q72 Policy JP-C 5 Walking and cycling network](#)

[Q73 Policy JP-C 6 Freight and logistics](#)

[Q74 Policy JP-C 7 Transport requirements of new developments](#)

Trafford

[Q108 Trafford - JPA 33: New Carrington](#)

Delivering the plan

[Q113 Policy JP-D 1 Infrastructure Implementation](#)

[Q114 Policy JP-D 2 Developer Contributions](#)

Proposed Green Belt Additions

[Q121 Trafford Green Belt Additions](#)



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Supporting Evidence

[123. Considering all the evidence presented in the supporting documents please respond to the questions below](#)



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Q18 Vision

Whilst the Plan Vision is admirable, we believe strongly that it should be refocused on addressing the climate emergency, rather than on accelerated economic growth, for the reasons set out in the following paragraphs. In addition, although the GMCA has introduced a short section (main document, page 84) which provides a few brief paragraphs under the heading “*Addressing Climate Change*”, this is woefully inadequate given the importance of supporting national, regional and local action plans when executing this Plan. With this in mind, we believe the Vision, and, therefore, the Plan, is not Positively Prepared.

In addition, many of the Policies do not demonstrate adherence to that Vision resulting in the Plan being not Positively Prepared, not Justified and not Consistent with National Policy as set out in the paragraphs below.

Achieving the Vision:

The Vision (main P4E document, paragraph 3.1, page 38) states that GM will be a “*place at the forefront of action on climate change with clean air and a flourishing natural environment*” This point should be at the top of the list on page 38 and expressed as the overarching Vision for GM.

Actions towards the achievement of this Vision are impeded by some of the Policies within this document or by the lack of compliance with those Policies set out in the Allocations. It is clear from the available land supply, Table 7.1 (page 131), for example, that there is no demonstrable need to release any green belt anywhere in Greater Manchester (as set out in our response to questions 44, 45 and 46), yet the plan continues to suggest that this is a requirement (paragraph 1.47, page 17).

Given the Vision to be at the forefront of climate action, securing clean air for residents and a flourishing natural environment, much greater weight should have been given to the importance of GM’s Strategic Green Infrastructure (set out at page 77), including our green belt, and much more evidence should have been provided about the relative values of the current natural capital compared to the resulting plans for these areas.

There are also significant inconsistencies throughout the Plan in terms of the balance between the economic, the social and the environmental goals that should determine sustainability. Just one example of this is the planned growth of Manchester Airport, which the plan says has “*the infrastructure, connectivity and scale to sustain a growing network of medium and long-haul routes*” (paragraph 2.14, page 28) and goes on to recognise the potential of the airport to support the wider growth agenda, without making any mention of the environmental harm that will be caused by the increasing number of flights and the reduction of green space in the vicinity of the airport itself.

The importance of the other regional asset, Port Salford, is mentioned at paragraph 2.15 (page 28) as “*an integrated tri-modal facility on the ship canal, with excellent rail and road links, enabling the benefits of easy port access*”, yet the New Carrington Policy and Allocation (JPA 33) plans to construct a dual carriageway across a peat moss to take HGVs onto local motorways rather than utilise this asset, despite the Manchester Ship Canal adjoining the industrial and warehousing site within that Allocation.

Plan Continuation Bias:

The challenges and uncertainties brought by Brexit and the pandemic are recognised in various paragraphs in the document, including, for example, at paragraph 2.7 (page 26). There is also increasing evidence in the public domain about future working practices (<https://www.bbc.co.uk/news/business-56972207>). Many of these suggest that office and retail space requirements are likely to be reviewed and revised (reduced). With this in mind, those Allocations which are proposing to build additional office space (such as Policy JP-Strat 10, Manchester Airport) should have been revisited. Yet paragraph 1.22 (page 12) states that, despite Stockport withdrawing, the increasing evidence of the climate emergency and the impact from both Brexit and Covid, “*PfE 2021 would result in a plan which has a substantially the same effect on the*



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participating nine districts as GMSF 2020". We believe this suggests that the documentation is displaying 'plan continuation bias' and as such is neither Positively Prepared nor Justified.

The Vision for Our Rural Assets:

In addition, this Vision does not give appropriate weight to the rural areas of our Region. The Plan confirms (paragraph 1.51 page 17) that almost half of the land in the 9 Boroughs (46.7%) is designated green belt, yet there are many examples throughout the documentation, including in the Scoping Report, that exclude the value of these rural areas and do not give a balanced response to the issues being raised. We believe this renders the Vision not Positively Prepared.

It is also not Consistent with National Policy, the NPPF suggests planning policies should enable the support of a prosperous rural economy (paragraph 84, page 23), with paragraph 79 (page 22) confirming that sustainable development should be promoted in rural areas to "*maintain the vitality of rural communities*" and paragraph 120 (page 35) stating that planning policies and decisions should "*encourage multiple benefits from both urban and rural land*".

The rural economy is not mentioned in paragraph 1.26 of the main document (page 13), for example, which covers the scope of the plan for sustainable growth. Paragraph 1.33 (page 15) recognises that we "*are currently not fully realising the possibilities of our key assets*" yet does not mention our agricultural and other rural assets (such as the livery economy).

Paragraph 2.2 (page 24) states that today, GM "*is a vibrant, dynamic and diverse city-region*", dismissing entirely the huge contribution made by our rural talent, resources and assets.

Paragraph 2.17 (page 29) to paragraph 2.22 (page 30) highlights how Greater Manchester is planning to become a "*top global city*", once again emphasising the urban economy and the part it plays to make Greater Manchester prosperous.

The Integrated Assessment GMSF Scoping Report 2021 (Document 02.01.01) also suggests, page 72 (Economy), that GM demonstrates "*a single labour market with interdependent businesses, towns and cities*". We strongly feel that GM's description of itself as a 'City-Region' excludes all those people who are involved in the rural economy and those who live in the rural parts of GM.

Despite the NPPF (July 2021, page 23) highlighting the importance of "*Supporting a prosperous rural economy*", we do not believe the needs of rural communities are equally considered and addressed alongside those of the urban areas in this Plan. There are, for example, no tables setting out the number of farmers in GM, the land size they farm, the livery economies associated with horse-riding, the supply chains of rural businesses, etc. Nor is there any reference to the challenges faced by these communities (such as the isolation, access to amenities, lack of sustainable transport options, the ability to find suitable local employment, and for employers, issues like the requirement to provide food and lodgings for staff, access to suitably trained resources and general labour supply, sickness and accident cover (when staff numbers are so low and available expertise is spread across a wide area), and challenges with digital connectivity, to name just a few).

Page 148 of the Integrated Assessment GMSF Scoping Report 2021 (Document 02.01.01) describes GM as "*being a largely urban area*". Page 180 of that document describes GM as a major urban conurbation with a landscape character that "*is dominated by the built environment*".

Paragraph 2.33 (page 35) states that, in the light of the challenges caused by the level of deprivation in some parts of GM, the Plan will need to "*Deliver high levels of economic growth to support the prosperity of Greater Manchester, whilst ensuring that all parts of our boroughs and all our residents share in the benefits; Deliver the highest possible quality of life for all our residents, and address existing problems such as health disparities and air quality that currently detract from it*". Yet there are no references to those specific challenges faced by the rural areas of GM.



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Spatial Strategy

The decision to go ahead with a dated Spatial Strategy means that many people have not had the opportunity to contribute to the options (especially those who were young in 2015 when the original Spatial Options paper was consulted upon, those who did not live in GM at that time and those who were not notified because the consultation approach was very poor).

A key source of evidence that younger people believe the climate emergency should be taken more seriously is a recent survey (reported here <https://www.bbc.co.uk/news/world-58549373>), which suggests that many feel betrayed, ignored and abandoned by politicians and adults.

The Vision also suggests the aspiration is for GM to become a *“place where people live healthy lives”*. Yet, despite the recognition of the significant impact of air pollution on our health (paragraph 5.39, page 96), there are no tables that set out the current levels of air pollution faced by residents in GM, nor the expected impact of the Allocations on local air pollution. As we mention elsewhere in our response, we do not feel it is reasonable or appropriate to promote the release of green belt without understanding the full impact of those plans on the health of local populations of both humans and wildlife. Until such clear data about the current and projected future air pollution accruing from those Allocations is available, we propose they are removed from the Plan to be dealt with via the Local Plan process.

Furthermore, the KPIs set out at page 392 of the document should be extended to include all aspects of the Vision.

Consultation

Finally, it is clear that the Allocations, in particular, lack compliance with Statements of Community Involvement and should be withdrawn until comprehensive community engagement has taken place, in line with the Gunning Principles.

As we have mentioned in our response to Policy JP-Strat 11 New Carrington, the consultation approach for this P4E plan and its predecessors do not give us confidence that the Vision for GM to be a *“place where all voices are heard and where, working together, we can shape our future”* will become a reality. Residents have not been involved in shaping this Plan (and let's be clear, giving us the opportunity to read, digest and comment on 150+ documents, over 14,000 pages, within a very short period of time, is not engagement or plan shaping).

Whilst there have been workshops with landowners and developers, as mentioned in the Delivery Topic Paper (03.01.05, paragraph 5.5, page 24), there have been no workshops with citizens about the implications of the developments in their areas. Trafford's Statement of Community Involvement (2015 iteration) states (page 10) that residents will be involved in the GMSF plans via workshops, for example, yet these have not been forthcoming. In that same document (paragraph 2.47, page 16) Trafford mentions that the Council itself has made extensive use of Stakeholder Workshops and intends to continue to do so, particularly *“at the early stages of plan preparation. A record will be kept of Stakeholder Workshop proceedings”*. No workshops have been arranged by Trafford in relation to the plans for this area, in fact there has been so little communication (let alone engagement) that most residents in the immediate area that would be impacted by the New Carrington Allocation, had no knowledge, in 2016, that such a large-scale development was being considered on their doorsteps. Trafford's commitment to early engagement is also mentioned in the latest iteration of their SCI (Trafford Statement of Community Involvement September 2020) albeit with a caveat that, now, requests for such engagement will only be *“considered”*. Despite a number of requests for workshops about the New Carrington Allocation and its implications for local residents, none have been arranged by the Local Authority.



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Modification:

We believe this Vision has not been Positively Prepared, is not Justified and is not Consistent with National Policy and should be updated to:

- revise the Vision to move the point that GM will be a “*place at the forefront of action on climate change with clean air and a flourishing natural environment*” to the top of the list on page 38 and express this point as the overarching Vision for GM
- commit to a comprehensive review of the impact of the climate emergency, Brexit and the pandemic (in collaboration with communities), to be published within the next 5 years and prior to any proposals to release green belt anywhere in Greater Manchester
- withdraw any Allocation that requires a change to the green belt boundary until such a comprehensive review has been completed and the additional evidence mentioned below has been provided
- include consideration, focus and evidence about the rural economy and associated businesses, together solutions to support the growth of that rural economy and ensure those businesses continue to support GM's sustainable growth
- provide additional evidence to support decision-making, particularly in relation to the Allocations, such as the comparative values of the existing natural capital/rural economy compared with the proposed developments, data about (for example) carbon emissions and the impact of air pollution that will accrue from the Allocations set out in the documentation
- include a review of the ‘consultation and engagement’ relating to all Allocations to ensure compliance with District SCIs and the Gunning Principles.
- incorporate additional KPIs that include all aspects of the Vision



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Q19 Strategic Objectives

An overarching Objective should be included to support achievement of climate emergency action plans. All other Objectives should be secondary to this key aim.

It is noted that document 02.01.02 (Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020)) states (paragraph 8.2, page 71, GM-S 2, 2020 Updated Position), "*Climate change should be made more explicit within the Sustainable and Resilient chapter and this policy specifically*", we believe the recommendation should go further and that the climate emergency should be central to this Plan, rather than accelerated growth.

Whilst we believe the current Objectives are encouraging, albeit that there are some gaps to be addressed, they have to be much more than just words on a page. Many of the Policies do not demonstrate adherence to those Objectives resulting in the Plan being not Positively Prepared, not Justified and not Consistent with National Policy as set out in the paragraphs below and elsewhere in our responses. In addition, whilst paragraph 12.3 (page 385) mentions that the Plan will make proactive use of publicly owned land there is insufficient evidence in the Plan or mention within these Objectives about how publicly owned assets can support their achievement.

Objective 1, page 40, relates to meeting our housing need, yet does not aspire to reduce the number of people on housing waiting lists, nor does it seek to ensure density expectations are met by Districts to reduce future pressure on GM's Strategic Green Infrastructure.

Objective 2, page 40, relates to creating neighbourhoods of choice, and promises to ensure that "*there is no increase in the number of homes and premises at a high risk of flooding*", this needs to be strengthened to state that this includes the risk of surface water flooding.

Objective 3, page 40, does not mention the rural economy, despite green belt covering almost half of the Boroughs' landmass (paragraph 1.51, page 17), nor how this will be promoted (NPPF, July 2021, page 23). The Objective should be updated to explicitly mention the rural economy.

Objective 4, page 41, is again totally focused on our urban holdings, the Objective should be updated to reference our extensive rural and environmental assets. The statement that development will be focused "*in the Core Growth Area, Manchester Airport and key economic locations*" seems detached from the proposed 38 Allocations which will result in the release of 2,430 hectares of land designated as green belt! In addition, given the label on this Objective, the reference to enhancing our cultural, heritage and educational assets only relates to national and international assets. We suggest that the label is amended so all our assets are incorporated under its auspices (as suggested in document 8.01.12 Historic Environment Background Paper 2020, Page 74 Recommendations, 8.1.2 point 2).

Objective 5, page 41, does not include any reference to improving equity of access to green spaces for all residents (it should be noted that prosperity is not only measured in terms of financial wealth). In addition, the lack of reference in the Plan to the rural parts of GM, suggests that the inequalities experienced by those residents will not be addressed and their prosperity will not be a focus for improvement. The Objective needs to be updated to cover this.

Objective 6, page 41, needs to be strengthened to ensure all increases in freight traffic are made by rail and shipping. Assets, such as the Manchester Ship Canal to transport freight traffic must be maximised and the Objective should explicitly mention how rural communities will benefit. In addition, all Allocations must be aligned with this Objective as it is critical to achieving sustainability.

Objective 7, page 42, needs to be strengthened to incorporate the potential for natural solutions to support achievement of the aim to be carbon neutral, especially given that almost half of our region is rural and many of our rural assets, such as our peat mosses, can support achievement of our carbon neutral goals. It should be noted that the document does not contain any information about

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the current carbon emissions, the carbon emissions that will accrue from the change of land use set out in the Plan, nor the projected carbon emissions from the planned developments.

Objective 8, page 42, should be strengthened to mention that any irreplaceable habitats, such as our ancient woodland and our peat mosses will be considered to be special landscapes (or key features, as described in Policy JP-Strat 13, page 77). Given the Government's Peat Action Plan, there should be no plans to develop on, rather than restore, our peat mosses, increasing climate resilience and reducing flood risk will not be supported by construction on our mosslands.

Objective 9, page 42, needs to be more specific in identifying how hospital bed capacity, access to health service and social care appointments and school places, will be increased. We can find no mention of a new hospital to address the needs of the 450,000 additional residents the Plan is proposing to build homes for - see our response to question 46 and no land set aside to build one. The Objective should be broadened to state that GM will attract the talent it needs to fulfil these requirements.

Objective 10, page 43, the point mentioned above, about lack of health care facilities to meet the needs of current and future populations, should be reflected here. The first sentence of this Objective must be updated to reference both existing residents and new communities. Reference should be made to the importance of GM's best and most versatile agricultural land to support sustainable access to healthy food options for communities. It should be noted that many of the Allocations are not being developed in sustainable areas (see our response to Q31 and Q108). Finally, access to the natural environment and green spaces will be reduced for those communities that are currently relying on areas of green belt that are included in the Allocations.

Furthermore, the KPIs set out at page 392 of the document should be extended to include all Objectives and their component parts.

Modification

We believe the Strategic Objectives are not Positively Prepared, as set out above. This section should be updated to:

- include an overarching Objective to support achievement of climate emergency action plans - all other Objectives should be secondary to this key aim
- include an introductory sentence, prior to setting out the secondary Objectives, which confirms that all future development, including the Allocations set out within this Plan, are expected to adhere to these Objectives
- provide more evidence about how publicly owned assets will support the achievement of the Plan Objectives
- incorporate the amendments suggested in the paragraphs above
- include a commitment that any Policy that does not currently meet the requirements of these Objectives will be updated
- withdrawal of any Allocation that does not fully meet the revised Objectives
- provide evidence that clearly sets out in the Plan the confirmed school, hospital and health/social care service provision for the future population of GM
- provide evidence to confirm the current carbon emissions, the carbon emissions that will accrue from the change of land use set out in the Plan, and the projected carbon emissions from the planned developments
- update the KPIs to measure all aspects of these Objectives.



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Q20 Spatial Strategy

Given each Authority and the GMCA (and all Health Authorities in the region have declared a climate emergency, we believe the Spatial Strategy should be revisited to focus on the delivery of the climate emergency action plans. Plans for economic growth should be adapted to achieve those climate emergency action plans.

In addition, we believe the Spatial Strategy currently lacks the balance between the economic, the social and the environmental goals that should determine sustainability. The Plan is, therefore, unsound, as it is not Positively Prepared (the area's needs in terms of ensuring a prosperous rural economy seems to have been omitted entirely and the Plan is not consistent with achieving sustainable development as it focuses almost entirely on economic growth and associated goals).

It is not Justified as it does not consider alternatives for our rural areas, particularly those which will be impacted by the plans to unnecessarily release green belt. Nor is there any evidence provided that suggests the benefits of promoting our rural economy should be outweighed by the proposed urbanisation. There are, for example, no tables anywhere in the Plan setting out the number of farmers in GM, the land size they farm, the livery economies associated with horse-riding, the supply chains of rural businesses. There is no information about the value of our rural economy and the benefits it brings in terms of, for example, reducing our carbon footprint and increasing our health and wellbeing (thereby reducing the cost of health services), the support it offers to address the climate emergency nor the natural capital value it provides.

With this rural omission in mind, the *"inclusive growth across the city-region"* mentioned at paragraph 4.1 (page 46) cannot be delivered if all aspects of that growth are not incorporated within the Spatial Strategy, which means that not all residents will be able to share *"the benefits of rising prosperity"* and, therefore, that the Plan is not Effective. The Spatial Strategy is also not Consistent with National Policy (NPPF paragraph 8, page 5) as it does not support strong, vibrant and healthy **rural** communities.

Consideration of the protection and enhancement of our natural environment is limited to two paragraphs on page 77, when it should have been embedded throughout Policies JP-Strat 1 to JP-Strat 12. In particular, there is no reference to conserving and enhancing our environmental assets, such as, for example, the best and most versatile agricultural land (NPPF paragraph 174, page 50) that could support the achievement of carbon footprint reduction goals. A passing reference to *"Creating places which will be more resilient to climate change"* (main document, paragraph 4.1 page 46) and *"strategic green infrastructure"* (main document paragraph 4.22, page 50) does not do justice to the importance of improving biodiversity and the potential for our natural habitats to support increased resilience to climate change.

As mentioned above, the achievement of a prosperous **rural** economy in GM appears to have been omitted entirely from the Spatial Strategy. There is no reference to the goals set out in the NPPF (paragraph 84, page 23) within the Spatial Strategy.

Even the question points to a clear focus only on *"delivering high levels of economic growth"*. This is reinforced in the main document itself, with paragraph 4.1 (page 46) confirming that the *"central theme of our spatial strategy is to deliver inclusive growth across the city region, with everyone sharing in the benefits of rising prosperity"*. As mentioned in other responses, calling GM a 'city region' is inaccurate. The main P4E document confirms (paragraph 1.51 page 17) that almost half of the land in the 9 Boroughs (46.7%) is designated as green belt and can be considered to be rural. This is also borne out by the comments in the 08.01.12 Historic Environment Background Paper 2020, Page 41, paragraph 4.3.1.

The key locations and assets set out in paragraph 4.3 (main document, page 46) should be updated to include more specific information about our rural and environmental assets (the number of hectares of woodland, farmland, mossland, etc) and the value they bring in terms of rural and



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environmental tourism and the health and wellbeing of both human and wildlife populations, in addition to their natural capital value.

We totally disagree with the assertion (paragraph 4.14, page 48) that there is a need *“for selective removal of Green Belt and the use of other land previously safeguarded from development”*. Our response to questions 44, 45 and 46 sets out our reasons in detail but, in summary, it is clear from the available land supply, Table 7.1 (page 131), for example, that there is no demonstrable need to release any green belt anywhere in Greater Manchester.

The challenges set out in paragraph 4.15 (page 48) do not include any issues faced by those in rural areas, nor does paragraph 4.16 (page 48) recognise that inclusive growth should incorporate our rural areas and that prosperity should be measured in terms other than just economic (health and wellbeing make people prosperous too and impact their quality of life).

With all these comments in mind, the Spatial Strategy needs to be updated before it can be considered to be *“addressing the challenges for securing genuinely inclusive growth and prosperity”* (paragraph 4.17, page 48). In addition, the overall Spatial Strategy of the Plan should be seeking to take advantage of more than just the *“opportunities for delivering high levels of economic growth”* (paragraph 4.17, page 48), it should be primarily seeking to address the climate emergency action plans and to deliver increases in health and wellbeing, social equity and environmental sustainability.

In addition, we do not believe the Plan, as currently articulated meets the requirements highlighted in document 04.01.03 (Carbon and Energy Implementation Part 2 - Carbon Offsetting 2020), page 27, which states that *“To be found sound plans must include; an understanding of baseline carbon dioxide emissions within the council area, the emissions inherent in future development and how the council’s actions and policies will reduce emissions in line with this trajectory to net zero.”*

In fact, given the Assessment Criteria set out in document 02.01.09 (Integrated Assessment of the Places for Everyone Plan - Growth and Spatial Options and Reasonable Alternatives Addendum (1)) related to promoting a proactive reduction in emissions across GM (page 224) suggests that this requirement is not considered to be relevant for site selection, it is hard to conclude that a proactive approach to mitigating and adapting to climate change and achieving radical carbon reductions in line with national legislation can be realised.

Furthermore, the KPIs set out at page 392 of the document should be extended to include all aspects of this Policy.

Modification

We believe this Policy has not been Positively Prepared, it is not Justified and it is not Consistent with National Policy. It should be updated to:

- focus on the delivery of the climate emergency action plans, with economic growth being a contributory goal of that key aim
- create a more balanced set of sustainable goals, as set out in the NPPF, paragraph 8, page 5
- emphasise the importance of GM's rural economy, as rural areas cover almost half of GM's land mass
- provision of evidence which provides clear details of all aspects of the rural economy, such as, for example, the number of farmers in GM, the land size they farm, the lively economies associated with horse-riding, the supply chains of rural businesses, the value of our rural economy and the benefits it brings in terms of, for example, reducing our carbon footprint and increasing our health and wellbeing (thereby reducing the cost of health services)
- provision of evidence about our rural assets, such as (for example) the number of hectares of woodland, farmland, mossland, etc) and the value they bring in terms of rural and environmental tourism and the health and wellbeing of both human and wildlife populations, in addition to their natural capital value



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- emphasise the importance of conserving and enhancing our environmental assets and strengthen the focus on climate resilience
- revise the site selection process to incorporate the reduction of carbon emissions as a clear objective
- provision of evidence to demonstrate an understanding of baseline carbon dioxide emissions within each Allocation area and the emissions inherent in future development (including how the change of land use will impact those emissions)
- incorporate sufficient KPIs to measure the success of this Policy.



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Places for Everyone Response

Q21 Policy JP-Strat 1 Core Growth Area

Whilst we accept that economic growth is very important, it must be considered in a balanced way, along with the social and environmental imperatives for a Spatial Strategy.

It is noted that, once again, that this section continues to perpetrate the exclusive importance of economic activity (paragraph 4.23, page 50). We disagree with the statement that the *“huge agglomeration of economic activity at the centre of Greater Manchester is perhaps the city region’s greatest strength”*. GM’s greatest strength is in its diversity - of landmass, of people and of jobs, to name but three. We are astounded that the GM region as a whole is cited in the document to be aspiring to become a top global city (paragraph 4.24, page 51), this may be appropriate for the city and some urban centres but the wider region deserves an accolade more suited to its overall composition.

The document suggests that this Core Growth Area has the *“largest concentration of key assets”* but again, only as determined in relation to economic growth.

This section of the document talks about growth only in the context of economics, with paragraph 4.24 (page 51) suggesting that growth in this area is *“fundamental to our overall strategy”*. Yet, as mentioned in our earlier response, inclusive growth is not possible if all aspects of potential growth are not included in the Spatial Strategy.

We do not have confidence that jobs will be created for the communities local to the Core Growth Area and, whilst the KPIs set out at page 392 will monitor the number of jobs created, as currently articulated, they will not monitor which communities are benefiting from those jobs. Those KPIs should be extended to include all aspects of this Policy.

This part of the document does not mention any aspect of improving essential green spaces in this Core Growth Area. This could be in the form of street trees, green roofs, or pocket parks for example. None of these are mentioned.

The document states (paragraph 4.25, page 51) that, whilst it is possible for residential sites to grow significantly, they must complement, rather than displace the economic functions. We would argue that, post Covid, many businesses, particularly those using office space, will be reviewing their requirements, so it is premature to suggest that the economic functions of this Core Growth Area should be paramount. The Spatial Strategy should be able to flex to meet the needs of future changes to both cultural and working practices.

Modification

We believe this Policy has not been Positively Prepared and should be updated to:

- address the broader concept of growth to create a more balanced set of sustainable goals, as set out in the NPPF, paragraph 8, page 5
- incorporate a broader set of KPIs that will measure the success of all aspects of this Policy.

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Q22 Policy JP-Strat 2 City Centre

Whilst the document states (paragraph 4.29, page 53) that this area will provide “the largest source of new jobs and homes”, the Policy makes no reference to ensuring that these homes support Greater Manchester’s housing crisis, which is the huge number of people on LA housing waiting lists (Policy JP-H 2 Affordability of New Housing, page 136).

ONS statistics (Table 1006C – Additional Social Rent Dwellings provided by Local Authority Area – Completions) show that over the period since the GMSF was first conceptualised GM’s record of building additional Social Housing is poor.

Table 1006C: Additional social rent dwellings provided by local authority area - Completions^{1,2,3,4,5,6,7}

	Current ONS code	Lower and Single Tier Authority Data	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20
England			9,331	6,798	5,814	6,742	6,337	6,644
North West	E12000002		634	586	414	598	507	470
	E08000001	Bolton	3	0	0	0	2	0
	E08000002	Bury	0	0	0	0	0	1
	E08000003	Manchester	31	0	0	28	12	69
	E08000004	Oldham	6	0	0	0	0	0
	E08000005	Rochdale	52	4	0	0	0	0
	E08000006	Salford	68	10	0	24	6	72
	E08000007	Stockport	2	6	9	16	0	3
	E08000008	Tameside	0	0	0	0	0	0
	E08000009	Trafford	0	0	0	8	2	0
	E08000010	Wigan	0	0	0	0	42	28

The number of additional homes for Affordable Rent (ONS Table 1006aC) is not impressive either!

Table 1006aC: Additional affordable rent dwellings provided by local authority area - Completions^{1,2,3,4,5,6}

	Current ONS code	Lower and Single Tier Authority Data	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20
England			40,860	16,549	24,454	26,922	28,938	28,209
North West	E12000002		5,581	2,268	3,294	3,745	2,871	2,975
	E08000001	Bolton	152	53	111	52	124	64
	E08000002	Bury	83	41	31	43	121	1
	E08000003	Manchester	249	79	142	180	135	27
	E08000004	Oldham	124	15	26	13	28	58
	E08000005	Rochdale	60	27	65	54	101	69
	E08000006	Salford	475	141	393	199	201	160
	E08000007	Stockport	132	36	28	160	64	48
	E08000008	Tameside	188	83	98	80	98	57
	E08000009	Trafford	68	15	52	132	1	39
	E08000010	Wigan	139	56	168	234	95	249

Manchester City Centre has a particularly poor record for providing Affordable Homes, which is frequently reported in local and national newspapers, with some developers that are not providing any affordable homes even being offered public money in the form of loans:

<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/over-1200-new-flats-manchester-21217838>,



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<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/city-centre-development-no-affordable-20237368>

<https://www.theguardian.com/cities/2018/mar/06/the-0-city-how-manchester-developers-dodge-affordable-housing>)

The City Centre also has a reputation for providing more homes to foreign investors than local people (<https://www.bbc.co.uk/news/uk-england-manchester-47417655>).

We feel there is a huge gap in this Policy to ensure that serving Greater Manchester residents is the priority for future developments that fall within the scope of this strategy and that there is no wriggle-room for developers in relation to avoiding the provision of affordable homes.

Furthermore, the KPIs set out at page 392 of the document should be extended to include all aspects of this Policy.

Modification

We believe this Policy has not been Positively Prepared and should be updated to:

- include requirements that focus housing provision on the needs of GM residents, particularly in relation to Affordable Homes
- extension of the KPIs to cover all aspects of this Policy.



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Q23 Policy JP-Strat 3 The Quays

The KPIs at page 392 of the main document are weak in relation to the Allocation areas.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q24 Policy JP-Strat 4 Port Salford

Whilst we welcome the development of an inland port, we have huge concerns about the lack of alternative options that have been considered. Once again, this policy focuses (paragraph 4.33, page 56) on the opportunity for significant economic growth. This development will require the release of green belt, much of which is Grade 1 best and most versatile agricultural land (paragraph 11.262, page 338) and irreplaceable habitat - peat moss land (point 18, page 337). Significant effort should have been made to consider alternative options before considering a Policy and associated Allocation that requires construction on these sites. We, therefore, believe this Policy is not Justified nor Consistent with National Policy (NPPF paragraph 174).

We are not clear, for example, whether multistorey warehousing is proposed, or whether land from the excess office space in GM could be repurposed. Consideration of such alternative options would significantly reduce the land footprint required on this site. Such solutions would also ensure there is sufficient green space between residential areas and this busy industrial area, reducing the impact of air, noise and light pollution. These alternatives would also limit the impact of the development on endangered bird and wildlife species.

We agree that one of the key attributes of Port Salford is “its potential to remove freight from roads and move it more sustainably by rail and water” (paragraph 11.263, page 338), and we note that there are plans for a new rail spur, *“alongside the canal, together with the provision of a major container terminal, will enable easy movement of goods between water, rail and road”*. Given the size of this transport investment, the Plan should ensure that freight traffic on the roads does not increase. It is vital, therefore, that the Policy is strengthened to **require** that freight traffic uses sustainable routes to get to the Port (for New Carrington, for example, freight could be transported via the Manchester Ship Canal – see our response to Q31 and Q108). Such a requirement would reduce congestion and eliminate the need for further road construction (paragraph 4.37, page 57). This approach would also reduce the air, noise and light pollution caused by HGVs.

Given the investment in rail and other connections mentioned in the paragraph above (and paragraph 11.262, page 338), and the consequent easy access for industrial and warehousing sites located elsewhere, it is not necessary for this Port Salford site to be maximised (paragraph 11.262, page 338). To be sustainable, the retention and conservation of the best and most versatile agricultural land and irreplaceable habitats, such as peat mossland, is critical.

We welcome the requirement that the Supplementary Planning Document (Policy JPA 29, Port Salford Extension, point 1 page 335) will be developed in consultation with the local community and other stakeholders, with the added obligation (point 2, page 336) that there will be high levels of community engagement in regular liaison meetings convened by the landowner or developers. The potential extension of the Trafford Park Metrolink line to serve Port Salford, is also particularly welcome.

If this site is to be truly sustainable, delivery of the Policy needs to be carefully monitored, particularly the delivery of sustainable transport (paragraph 4.33, page 56). There are currently no KPIs (page 392) that would monitor delivery of this Policy. Those KPIs need to be extended to monitor every aspect of this Policy, including achievement of sustainability goals.

In addition, there is no information in the Plan that sets out the current traffic using the Manchester Ship Canal and the prospective traffic, how it will grow and what the implications of that growth will be (for example, road bridges across the ship canal will have to be lifted for ships to pass through).

Modification

We believe this Policy is not Positively Prepared, not Justified and not Consistent with National Policies, it should, therefore, be updated, following genuine consultation with local residents, as follows:



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- the Policy should be reviewed, in conjunction with local residents, and updated to consider options that do not require the release of green belt, particularly best and most versatile agricultural land and peat mossland
- information should be provided that sets out the current traffic using the Manchester Ship Canal and the prospective traffic, how it will grow and what the implications of that growth will be
- the Policy should also be strengthened to **require** that freight traffic uses sustainable routes to get to the Port
- any Allocation associated with this Policy that requires the release of green belt should be withdrawn and handled through the Local Plan process, following robust consultation with local residents
- the KPIs should be updated to incorporate all aspects of this Policy, including measures of sustainability.



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Q25 Policy JP-Strat 5 Inner Area Regeneration

The KPIs at page 392 of the main document are weak in relation to the Allocation areas.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q26 Policy JP-Strat 6 Boosting Northern Competitiveness

The KPIs at page 392 of the main document are weak in relation to the Allocation areas.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q27 Policy JP-Strat 7 North East Growth Corridor

We welcome the confirmation (page 63) that the land at the High Crompton Broad Location will be retained in Green Belt, until such time that a review of this Plan and / or the Oldham Local Plan can demonstrate that it is necessary. As set out in our response to question 46, we believe it is clear from the available land supply, Table 7.1 (page 131), for example, that there is no demonstrable need to release any green belt anywhere in Greater Manchester. The Policy is, therefore, not Positively Prepared nor Consistent with National Policy.

Furthermore, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan.

Modification

We believe this Policy should be modified as follows:

- the KPIs need to be updated to ensure they measure all aspects of this Policy
- as explained elsewhere in our response, given that there is no demonstrable need to release Green Belt anywhere in GM, all Green Belt allocations, including those relating to this Policy, should be withdrawn from the P4E Plan.



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Q28 Policy JP-Strat 8 Wigan-Bolton Growth Corridor

It is clear from the available land supply, Table 7.1 (page 131), for example, that there is no demonstrable need to release any green belt anywhere in Greater Manchester (as set out in our response to question 46). The Policy is, therefore, not Positively Prepared nor Consistent with National Policy.

Furthermore, if updated, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan.

Modification

We believe this Policy should be modified as follows:

- the KPIs need to be updated to ensure they measure all aspects of this Policy
- as explained elsewhere in our response, given that there is no demonstrable need to release Green Belt anywhere in GM, all Green Belt allocations, including those relating to this Policy, should be withdrawn from the P4E Plan.



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Q29 Policy JP-Strat 9 Sustaining Southern Competitiveness

Given the focus on economic growth in the Plan, it is unsurprising that the description of the important strategic green infrastructure assets (paragraph 4.60, page 68) fails to mention that this area also includes GM's second largest peat moss, Carrington Moss. There are other irreplaceable habitats in the area, including ancient woodland. A balanced and sustainable Spatial Strategy would not omit such natural assets because of their capacity to address climate resilience, carbon capture and flood risk.

In listing the potential of key assets, the document focuses on the main town centres and Manchester Airport, it does not mention the potential of our peat mosses to be restored to deliver "*broader sustainability objectives*" (paragraph 4.61, page 68).

Green Belt, the equivalent of 423 football pitches (at an average size of 0.714 ha), will be sacrificed to construct the developments focused around two of Manchester's key assets (Manchester Airport and Wythenshawe Hospital, paragraph 4.62, page 68) and the overlooked key natural asset (Carrington Moss, paragraph 4.63, page 68). We believe this is unreasonable when it is clear from the available land supply, Table 7.1 (page 131), for example, that there is no demonstrable need to release any green belt anywhere in Greater Manchester (as set out in our responses to questions 44, 45 and 46). The Policy is, therefore, not Positively Prepared nor Consistent with National Policy.

Paragraph 4.63, page 68, is in fact disingenuous when it suggests that the New Carrington development is focused around the former chemicals complex in Carrington. This is incorrect. The development is focused on and around the second largest peat moss in Greater Manchester, Carrington Moss. The brownfield land that formed the one-time chemical complex has already been given planning permission and those developments (of both housing and industrial/warehousing) are already under construction. The land that does not yet have planning permission is all Green Belt and Protected Open Land. It is peat moss, grade 2 best and most versatile agricultural land and woodland. Much of the area often acts as a sponge, soaking up huge volumes of surface water flooding. In addition to its contribution to Trafford's rural economy, the area is used extensively by both professional and amateur sports people. It is a social prescribing destination and has appreciably benefited the mental and physical health of local people throughout the pandemic. These issues are discussed further in our responses to Q31 and Q108.

The Sustaining Southern Competitiveness Policy itself states (page 69) that the "*economic competitiveness, distinctive local neighbourhood character and environmental attractiveness of the southern areas will be protected and enhanced*". Yet, as mentioned above, the Green Belt loss is extensive. The balance required to achieve sustainable development has not been satisfied, and the evidence of exceptional circumstances has not been provided (as set out elsewhere in our response). This policy, therefore, is not Consistent with National Policy.

Furthermore, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan and for this Policy should include reference to the irreplaceable habitats in the area.

Modification

We believe this Policy should be modified as follows:

- the KPIs should be updated to cover all aspects of this Policy
- the wording in this Policy should be reviewed and updated to ensure it is factually correct
- as explained elsewhere in our response, given that there is no demonstrable need to release Green Belt anywhere in GM, all Green Belt allocations, including those relating to this Policy, should be withdrawn from the P4E Plan.



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Q30 Policy JP-Strat 10 Manchester Airport

This Policy proposes the growth and expansion of Manchester Airport (paragraph 4.67, page 70) at the expense of our rural economy and Green Belt land.

The document refers (paragraph 4.67, page 70) to Manchester Airport Group's (MAG) Corporate Social Responsibility Strategy (<https://www.magairports.com/responsible-business/our-responsibility-plans/>), but, whilst this short document has many admirable features, it does not actually demonstrate how MAG will achieve zero carbon status. In fact, the Plan and the MAG CSR strategy both lack robust data about emissions that confirm what the airport emissions are today and what they are expected to be post-growth. This data is essential, especially given the significant impact on local residents, particularly those who live on or near the flight paths (because a plane's CO₂ emissions are higher during the take-off and landing phases <https://www.bbc.com/future/article/20200218-climate-change-how-to-cut-your-carbon-emissions-when-flying>).

As there is a known and direct impact on health and wellbeing (<https://www.theguardian.com/environment/2021/aug/27/air-pollution-linked-to-more-severe-mental-illness-study>, <https://www.theguardian.com/environment/2021/sep/01/air-pollution-is-slashing-years-off-the-lives-of-billions-report-finds>), residents should be able to review the carbon implications of each Allocation, including the impact of emissions from air traffic. Given this evidence is not available, the Policy is not Justified and should, therefore, be withdrawn from the Plan until such evidence is available and climate-friendly fuel is available.

In addition, paragraph 4.68 (page 70) outlines the need for the airport to be "*well-connected to the key towns and cities that it serves*" to encourage economic stimulus and growth in long haul services. Given the requirement for the region to accept the HS2 rail link, there should be no requirement for further investment in the North's strategic road network. Once again, our rural areas are being decimated to support economic growth, either directly or indirectly.

With this in mind, the Policy is incorrect in suggesting that the growth of Manchester Airport is sustainable (page 71). In addition, we would argue that, post Covid, many businesses, particularly those using office space, will be reviewing their requirements, so it is premature to suggest that (point 1, point 3, page 71) there will be a need for additional office space.

Furthermore, the KPIs set out at page 392 of the document should be extended to include all aspects of this Policy.

Please also refer to our response to question 44, Office Development, which despite extensive oversupply of office space, is proposing the release of green belt at Manchester Airport.

Modification

We believe this Policy should be withdrawn as suggested above and modified as follows:

- provision of information about current carbon emissions, the emissions that will accrue from the planned expansion of the airport, especially those that will impact residents who live on or close to the flight paths to and from the airport
- the KPIs should be updated to include all aspects of this Policy
- as explained elsewhere in our response, given that there is no demonstrable need to release Green Belt anywhere in GM, all Green Belt allocations, including those relating to this Policy, should be withdrawn from the P4E Plan.



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Q31 JP-Strat 11 New Carrington Policy

This Policy is totally disingenuous in both its description and its aims. The Site Selection Background Paper (03.04.01) suggests, paragraph 6.31 (page 22) that the New Carrington development (JPA 33) “*provides the only opportunity in Greater Manchester to deliver a new settlement of significant size*”. Yet there is no evidence provided to confirm that assertion, which we believe to be incorrect, and is an odd choice of location given the aim to boost northern competitiveness. In addition, we can find no reference in the Growth and Spatial Options Paper to the need for a new settlement (in any of the options) or anything that suggests a significant opportunity for development, of the size proposed at New Carrington (paragraph 4.70, page 74), is either desirable or required in GM. As mentioned elsewhere in our response, we believe smaller developments, in more sustainable locations, would be more aligned with the Policies set out in this Plan than what is currently proposed at New Carrington.

About the Land Area

The Policy states, paragraph 4.70 (page 74) that the location “*enables the redevelopment of the extensive former Shell Carrington industrial estate*”, yet these brownfield areas within the Policy have already been granted planning approval, outside the auspices of this Plan. This is clearly why the recommendation in document 02.01.02 (Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020)) to refer to a brownfield first approach has not been accepted (paragraph 7.11, page 64, GM-Strat 11, 2020 Updated Position).

The parts of the Policy area that are outstanding for approval are on green belt or protected open land and mostly comprise peat moss (the second largest in GM), grade 2, best and most versatile, agricultural land and woodland areas.

The Carrington Relief Road (a proposal within this Policy) is also being progressed by Trafford outside of this Plan, which, together with the brownfield sites mentioned above, means that this New Carrington Policy is being delivered by stealth, rather than through a transparent process. The New Carrington Masterplan recognises (section 3.2, page 12) that a “*large proportion of the New Carrington allocation falls within the Green Belt*”.

In addition to its contribution to Trafford’s rural economy, the green belt/protected open land area, is used extensively by both professional and amateur sports people. It is a social prescribing destination and has appreciably benefited the mental and physical health of local people throughout the pandemic. There are a number of SBIs on and around Carrington Moss and the proposed development would have a huge impact on populations of red listed birds and endangered wildlife in the area. It will also considerably affect the health of local residents, particularly due to the increases in air, noise and light pollution and the potential stress of more widespread surface-water flooding.

Lack of Evidence

The Policy states (paragraph 4.70, page 74) that it will “*support the regeneration of neighbouring Partington and Sale West*” yet there is no evidence anywhere in the documentation that sets out how that regeneration will be delivered. Given the abysmal lack of progress made with the regeneration of Carrington, Partington and Sale West, as outlined in Trafford’s previous Development Plans ([UDP – 2006](#) and [Core Strategy 2012](#)), and the total absence of any KPIs (page 392) to monitor and measure the delivery of this Policy, we have no confidence that the development at New Carrington will result in the regeneration of these areas.

Lack of Sustainable Options

The Policy also promises sustainable growth, yet a suburban option of the densities proposed for New Carrington is the least sustainable of those available. New Carrington will be, for the most part, accessed by car, as the Policy brings no trams, no trains and no commitment to increased bus services (we have validated this via an FOI request) – shameful for an area that is currently



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considered to be an isolated community (paragraph 4.71, page 75) and that is relatively poorly served by public transport (paragraph 4.72, page 75).

The Policy area abuts the Manchester Ship Canal, yet, despite the huge numbers of HGVs that are the result of Trafford's overdevelopment of industry in the area, there is nothing in the Policy to make use of that sustainable asset for the shipment of freight. This could be achieved via a bridge to Irlam Wharf, or the creation of a Wharf on the Carrington side of the Canal. These and other options are discussed in our response to Q108.

It is clear that all the solutions available to secure sustainable transport have not been fully considered. The only option that appears to have had any effort assigned is the construction of a major new road, which is not compliant with the Policies in this Plan, or Trafford's declaration of a climate emergency.

This Policy suggests that the plans for the area will (paragraph 4.73, page 75) "*adopt sustainable principles, maximising opportunities to mitigate environmental impacts and deliver inclusive growth for the benefit of local communities*". It is hard to understand why anyone would consider it sustainable to even contemplate construction on a peat moss and grade 2 agricultural land, it is impossible to mitigate the environmental impacts of destroying an irreplaceable habitat and BMV land should be prioritised for local food production. We are also at a loss to explain how the expected growth benefits local communities when the largest new employer in the area brought all their staff with them from their previous location and the majority of the properties that are already being developed are not affordable for many local residents.

Lack of Consistency and Transparency

The Policy itself (page 75) states that land to accommodate around 4,300 dwellings and 350,000 sqm of employment floorspace has been identified. Those parcels with planning permission should be removed from this Allocation to ensure there is clarity – this is purely a green belt and protected open land Allocation. The lack of consistency between the numbers in this document and those in the supporting papers make it difficult to assess what is actually being considered and whether it is appropriate. It seems the Education department has estimated school places on the basis of 33% of the homes being 1 bedroomed, yet the New Carrington Topic Paper suggests the site will primarily deliver family housing (page 79). The Transport Locality Assessment and its Addendum (documents 09.01.15 and 09.01.27 respectively) report different numbers for both housing and employment space to the main document and do not provide the required information to determine the actual level of traffic that will be using local roads, this would include:

- current traffic figures relating to the Allocation area (separating HGVs from cars, and residents from employees)
- increases in traffic from proposed developments already approved within the Allocation area (separating HGVs from cars, and residents from employees)
- increases in traffic from the proposed developments within the Allocation (separating HGVs from cars, and residents from employees)
- we would also need to understand what level of traffic has been considered from outside the Borough, in particular, the traffic using the Warburton Bridge, which is proposed for renovation and upgrade as mentioned below.

None of this traffic information is available, despite it being requested repeatedly by residents for almost 2 years. We have also requested workshops be held to discuss the traffic issues. Our requests for this and other workshops have not been addressed.

It should be noted that, despite the Warburton Toll Bridge being a major route into the area from outside the Borough and the website (<https://www.warburtontollbridge.co.uk/download-consultation/>) stating that there is a Sustainable Investment Plan, developed in consultation with Warrington and Trafford Councils, there is no reference to this in the New Carrington Policy or in the Allocation documents. The transport documents lack the transparency needed to determine



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whether traffic from outside the borough is adequately considered, especially when an upgrade, such as this, has been planned.

The Policy itself also suggests (page 75) that there will be major investment in active travel, public transport and highway infrastructure but the only commitment in the Transport Delivery Plan (document 09.01.02) is the Carrington Relief Road, which will bring huge increases in air, noise and light pollution to local residents, will impact rural businesses and detrimentally affect a number of sites of biological importance in the area. The wording in this Policy needs to be revisited to make sure it is based on fact.

Even the question itself is misleading and reads more like a developer's sales brochure, rather than a plan which should outline the key implications of these planned developments on current and future residents. The graphic shown within the question is also misleading. Much of the green corridor between Carrington and Sale West is used by businesses and is not accessible to the general public. It includes, for example, United Utilities works, Manchester United FC training ground, Sale Sharks RFC training ground, Sale Rugby FC training ground, a large National Grid site, 2 riding centres, a solar farm and some farmhouses. The inaccessible land totals more than 80 hectares and that does not include the land to be taken by the dual carriageway that is proposed to become the Carrington Relief Road, nor the other 3 major roads planned for the area, none of which can be considered to be accessible green belt land.

Plan Continuation Bias

It is also clear that this Policy demonstrates extensive plan continuation bias as Trafford was the first Local Authority in GM to [declare a climate emergency](#) and has also produced a [Carbon Neutral Action Plan](#). As a consequence of declaring a climate emergency, the Council agreed to "*consider systematically the climate change impact of each area of the Council's activities*". There is no evidence in this Policy or the supporting documents that such an impact assessment has been completed for this project.

Integrated Assessment

The Integrated Assessment GMSF Scoping Report 2021 (Document 02.01.01) recognises (page 148) the importance of Manchester's Mosses and Wetland habitats. The document also points (page 149) to the GM Biodiversity Action Plan (GM BAP), "*which identifies a list of habitats and species considers as priorities for nature conservation*". One of these habitats is Lowland Raised Bog, the species list includes the Water Vole and the Willow Tit, both of which are found on Carrington Moss.

The IA report (Document 02.01.01) highlights the link between the Trafford Local Plan IA Objectives and the GMSF IA Objectives. It should be noted that we do not believe this New Carrington Policy is consistent with the following Trafford Objectives (page 378):

- Objective 3: Support the health and wellbeing of the population and reduce health inequalities
- Objective 5: Ensure there is sufficient coverage and capacity of sustainable transport and utilities to support growth and development
- Objective 7: Conserve and enhance the landscape, townscape and the character of the Borough
- Objective 8: Conserve and enhance the historic environment
- Objective 9: Improve air quality
- Objective 10: To conserve and protect land and soils, whilst reducing land contamination
- Objective 11: Protect and improve the quality and availability of water resources
- Objective 12: Conserve and enhance biodiversity and promote nature conservation
- Objective 14: Reduce the per capita greenhouse gas emissions
- Objective 15: Reduce the consequences of flooding



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- Objective 16: Ensure communities, developments and infrastructure are resilient to the other effects of expected climate change

Furthermore, this New Carrington Policy has limited compliance with the other Trafford IA Objectives.

Lack of Compliance with Plan Objectives

In addition, this Policy is not compliant with any aspect of Objective 2 of this Plan (page 40). The proposal is to release 169 hectares of green belt land (as mentioned above, the brownfield land in the Allocation area already has planning approval). It is not located within the Core Growth Area, nor within 800m of a public transport hub. Homes and roads built on and across Carrington Moss will carry a high risk of flooding and the Carrington Relief Road has been prioritised above all sustainable modes of transport.

The Policy does not comply with Objective 5 (page 41). It will not address any aspect of inequality and will, in fact, increase inequality of access to green space and nature. The location is not well-connected and inequity of access to public transport will continue as there are no plans to introduce trains or trams and no commitment to increase bus services. There will also be very limited access to affordable homes (the expected number is very low - 15% but previously approved planning applications in the area have secured much lower figures). As we have noted elsewhere in our response, prosperity is not just measured in terms of financial or material wealth.

The Policy does not comply with Objective 6 (page 41) for the reasons mentioned above, plus there are no plans to secure sustainable freight movements in the area, despite the potential to exploit the proximity of the Manchester Ship Canal and Irlam Wharf.

The Policy is also not compliant with Objective 7 (page 42) as building on the second largest peat moss in GM will result in huge amounts of carbon being released into our local atmosphere, to say nothing of the lost opportunity provided by peatland restoration. Sustainable transport is not a commitment for New Carrington, so car dependency will be encouraged. Local resilience will be reduced by the loss of the area which currently captures and stores significant volumes of surface water flooding for at least 6 months of every year.

The Policy also does not comply with Objective 8 (page 42) as building on an irreplaceable habitat, such as Carrington Moss will not improve the quality of our natural environment nor our access to green spaces. Red-listed birds and endangered wildlife will be displaced, their populations put at further risk. Our landscape will be dominated by a dual carriageway (and three other major new roads), rather than the current views of a landscape that stretches for around 20 miles (which can be seen on our website at this link <https://friendsofcarringtonmoss.com/photos-videos/>). As mentioned above, Carrington Moss will no longer be able to support climate resilience and reduce flood risk, which it does so well today!

The Policy does not comply with Objective 10 (page 43). Whilst the Plan overall makes no reference to new hospitals and there are already growing waiting lists and waiting times, there is no evidence which sets out where new residents will secure health services (a recent planning application, for example, suggested residents of Carrington would need to travel to Partington or Sale). Access to healthy food options will be limited by plans to build on BMV agricultural land. The unnecessarily release of 2,430 ha of green belt for development will increase air, noise and light pollution as developments such as New Carrington are not in sustainable locations and are not supported by improved public transport services.

Carrington Moss is currently well used by both professional and amateur sports people (including those who use Manchester United's training grounds, Sale Sharks' training grounds and Sale Rugby FC's training grounds, so, air quality levels in and around the area's amenities are extremely important. There has long been evidence that air pollution has unfavourable effects on the respiratory and cardiovascular system. The proximity to emissions from high volumes of traffic, such as those planned for the Carrington Relief Road, are of particular concern. Studies have



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shown that exposure to air pollution can be seriously detrimental to an athlete's health and performance (<https://bjsm.bmj.com/content/35/4/214>) and athletes themselves have started to make the connection (<https://sustainabilityreport.com/2020/04/23/air-pollution-tackling-sports-invisible-threat/>). We note that the [World Health Organisation](#) has announced (22nd September 2021) that it is reducing the maximum safe levels of key pollutants with PM_{2.5}: reduced from 10 µg/m³ to 5 µg/m³ (NB the legal limit is 20 µg/m³) and NO₂: reduced from 40 µg/m³ to 10 µg/m³ (NB the legal limit is 40 µg/m³). These levels will be phased towards the 2030 target date but this is clearly something that should be considered in reviewing this and other Allocations incorporated within the Plan.

For walkers, cyclists and horse riders, the proposal will fracture their routes, with air and noise pollution particularly making their journeys much less attractive. The development will also have serious implications for the rural (agricultural farmers), stable and livery services businesses in the area. It should be noted that there are currently over 1,000 horses stabled on and around Carrington Moss. This information has been provided by the British Horseriding Society as there is no information about any aspect of GM's rural businesses anywhere in this Plan.

In addition, Carrington Moss is a social prescribing destination and has appreciably benefited the mental and physical health of local people throughout the pandemic. Constructing roads and housing in this area will affect future opportunities to support the health of some of our most vulnerable residents.

Lack of Compliance with National Policy

There are many ways in which this Policy is not Consistent with National Policy. Some of these are listed in the paragraphs below and others are incorporated within our response to Q108 (New Carrington Allocation JPA 33) but we would specifically wish to highlight NPPF paragraph 22 (page 9) which requires larger scale developments to be set out within a vision that covers at least a 30-year period. This Plan only covers a period of 16 years and is, therefore, non-compliant.

The Policy and the Associated Allocation do not comply with NPPF paragraph 104c (page 30), because, as mentioned above, there are no plans to make improved public transport a choice for existing or new local residents. This concern is reinforced by the response to the recommendation made in document 02.01.02 (Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020)), which suggested that more detail should be provided about the transport network for the Allocation (paragraph 7.11 GM-Strat 11, page 62). The 2020 Updated Position (page 63) confirmed that the wording was not amended to include references to public transport because it was addressed by Policies which do not exist. It should be noted that this Policy's lack of compliance with Policy JP-C 3 is addressed in our responses to Q70 and Q108.

Another key area of non-compliance is the impact of the Policy on Trafford's green belt land.

Document 07.01.25 - Stage 2 GM Green Belt Study - Assessment of Proposed 2019 GMSF Allocations (2020) – sets out (page 64) a summary of the case for strategic exceptional circumstances. The key pillar of this case is the growth and spatial options, which have not considered a climate emergency focused alternative. This is unreasonable, given that each District, the GMCA and all Health Authorities in the region has declared a climate emergency since 2018. In addition, as we explain in our response to Q44, Q45 and Q46, there is sufficient flexibility and choice of sites without needing to the release green belt, given the predicted population increase for the region, and the likelihood of further brownfield land becoming available following Brexit and the pandemic. There is also a significant over-supply of office space which may come forward via permitted development rights for conversion to homes. No estimate has been made in the region's housing and employment land supply for large and medium windfall sites and potential permitted development schemes. We believe the Policy is, therefore, not consistent with NPPF paragraph 141 (page 42) which suggests that all reasonable alternative options should have been examined before concluding exceptional circumstances exist.



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Furthermore, paragraph 1.38 (page 64) suggests that all the Allocations are in sustainable locations. This is patently not the case as mentioned above and in our response to Q108 (New Carrington Allocation JPA 33). As explained in the paragraphs below, we do not believe the level of harm proposed by the green belt release has been fully presented in the evidence provided and the ecosystem services performed by the remaining green belt will be significantly affected by the planned release. Additionally, there is no evidence about the harm to the rural economy that will arise as a direct consequence of this Policy (and Policy JP-G 10, more generally for GM), in fact, the importance of the rural economy is not mentioned in this Plan.

We do not believe the case for strategic exceptional circumstance has been proven and this renders the release of green belt in the region both premature and unsound.

Green Belt Release

Document 07.01.08, sets out the method (page 16) used to assess the harm that would follow the release of green belt as set out in each of the Allocations. Whilst the harm assessments have considered the specific impact on the green belt purposes as defined in the NPPF (paragraph 138, page 41), we do not believe sufficient emphasis has been given to, nor evidence provided about, the wider benefits, such as the ecosystem services, natural capital value and openness/landscape, offered by our current green belt land, nor the level of support they provide to the climate emergency action plans or the carbon neutral action plans. These should be included in the harm ratings.

The harm ratings, related to the NPPF green belt purposes, for New Carrington range from Moderate (one parcel), Moderate-High (4 parcels), High (one parcel) and Very High (one parcel). As set out above, these ratings do not include an assessment of the relative value of the grade 2 BMV agricultural land, nor the carbon sequestration services that are being provided by the extensive woodland (well over 100 hectares) across the Allocation area. Whilst the peat (325 hectares, at varying depths, in 1995, GM Wetlands Survey) is degraded, it is still storing carbon and could be restored to make a much more effective contribution to GM's carbon neutral goals. The provision of habitats for over 20 red listed bird species and a number of endangered wildlife, such as the willow tit and the water vole, should also be given a high weighting given that these are two of the most endangered creatures nationally and internationally. The likelihood of harm from development resulting in a further reduction of the populations of such species should be assessed and published.

The document (07.01.08) sets out (page 30) the case law established in 2015 in relation to the exceptional circumstances that warrant the release of green belt. We believe that giving significant weight to the consequence of impact to those wider benefits is essential when considering "*the nature and extent of harm to the Green Belt*", particularly as, since the date of this planning judgement, most Local Authorities have declared a climate emergency and there is increasing recognition of the importance of improving biodiversity and supporting populations of endangered species.

With all these factors in mind, we had expected each Allocation to include evidence about the impact on rural businesses and/or ecosystem services currently performed within the Allocation area, together with an assessment of the natural capital value of the site and the openness/landscape. Without this information, a complete picture of the harm of releasing green belt is not available to support a robust decision.

We disagree with the statement in document 07.01.25 (paragraph 1.8, page 6) that a comprehensive evidence base was assembled, there are many gaps in relation to measuring what will be lost as a consequence of the release of green belt land. It should be noted that the Green Belt Topic Paper was one of a number of documents that were not made available in 2020, so we not able to consider this lack of evidence previously.

We also note that the green belt assessments seem to have focused totally on the strategic impact of the losses (document 07.01.25, paragraph 1.30 page 61, for example, mentions the combined



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effect of release in relation to the strategic functioning of GM's green belt). We do not believe there is sufficient focus on the local impact of releasing green belt. In New Carrington, for example, as mentioned above, much of the remaining green belt land (over 80 hectares) is not accessible to the general public. This inaccessible land will be extended to include a dual carriageway and 3 other major new roads planned for the area. These new roads will not only fracture the health and wellbeing routes for walking, cycling and horse riding for the public, they will also fracture the foraging corridors for the endangered species mentioned above.

Document 07.01.10 (Stage 2 GM Green Belt Study - Addendum Assessment of Proposed 2020 GMSF Allocations (2020)) sets out (page 103) the assessment of harm levels. Whilst there is recognition of the high levels of harm in, for example, GM45-6, it makes no mention of the planned major roads that will further reduce perceived settlement separation nor the significant amount of inaccessible land that is used by businesses.

The current inequality of access to green belt has not been addressed in the Plan, Trafford residents start with less access to green belt than other Districts in GM and, at the end of the Plan period, have an even lower proportion of green belt. Document 07.01.25 sets out (paragraph 1.34, page 63) that there will be an overall net loss of 3.27% green belt, yet this figure hides the facts set out in Figure 6.6 (page 34), Trafford suffers a net loss of 6.7% and Bury an even higher net loss of 8.8%. Whilst paragraph 1.34 goes on to suggest that overall, across GM, green belt take has been reduced by almost 60%, this is not the case for Trafford (where the reduction has been a little over 40%).

We do not believe the case for exceptional circumstances has been made for New Carrington. We recognise that the harm caused by the release must be balanced by other factors (document 07.01.25, paragraph 1.2, page 66) but the documentation does not demonstrate that New Carrington will be a sustainable location, nor is the viability and deliverability without question (the low % of affordable housing is evidence here), nor does the documentation provide information about the impact on the local rural economy. Furthermore, the work undertaken by the Friends of Carrington Moss to identify alternative land supply in Trafford revealed sites that were not on Trafford's list. This is further discussed in our response to Q108.

We believe, therefore, that the release of green belt at New Carrington (and elsewhere in the region) is premature and that there should be a comprehensive review of available and potential brownfield land, involving residents. The results of that review should be published prior to any consideration of green belt release anywhere in GM. Should the review result in any requirement to release green belt in the future, the implications should be fully understood by local residents and the resulting changes can be addressed within Local Plans.

Given that document 07.01.12 (Stage 2 GM Green Belt Study - Identification of Opportunities to Enhance the Beneficial use of the Green Belt) mentions (page 26) that a Natural Capital Account has been produced at district level, we are surprised that this has not been extended to capture the Natural Capital Value for each Allocation. We believe this is essential evidence in the decision to release these areas of green belt as it will help to ensure that the economic benefits of green infrastructure can be understood alongside other key indicators of economic performance (paragraph 12.13, page 389). Allocations should be withdrawn from the Plan until this information is available

Viability

Finally, we note with interest the content of document 03.01.04 (PfE Strategic Viability Assessment Stage 2 Allocated Sites Amendments). We believe the viability for this Allocation can be considered to be finely balanced (having only achieved a minimal positive residual value after reducing affordable housing by 50% and increasing selling prices by 10%) and we would like the associated assumptions and contingency to be more visible. Given the plan to develop on a peat moss, we expect there to be numerous complexities in terms of (for example) how the peat will be handled and infilled, how potential future flood risks will be averted and how sustainability will be



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achieved. As mentioned elsewhere in our response, we believe there are alternative sites that could offer greater prospects in terms of both viability and sustainability.

Modification relating to the paragraphs above:

For the reasons set out in the paragraphs above (and those set out below, which discuss specific policies within the Plan), we believe this Policy has not been Positively Prepared, neither is it Justified, Effective or Consistent with National Policy. It should, therefore, be withdrawn from this Plan and be reconsidered within Trafford’s Local Plan, following significant genuine consultation with local residents.

In addition, the Allocation should be updated to:

- remove those parcels of land that have already been granted planning approval and other aspects of the Policy or Allocation that are being dealt with in other ways (such as the Carrington Relief Road)
- include the evidence of the systematic appraisal of the climate change impact of this proposal, as set out in the Council’s agreed actions following their declaration of a climate emergency
- include evidence which demonstrates the harm to the wider benefits of green belt, such as the ecosystem services performed, the natural capital value, the value of the openness/landscape, the level of support each Allocation provides to the climate emergency action plans and the carbon neutral action plans
- include evidence about the impact on rural businesses within the Allocation area
- provision of other information needed to consider the impact of the development (such as, for example, the traffic information mentioned above, and the carbon implications of the change of land use and the implementation of 4 major new roads in the area)
- undertake a comprehensive review of available and potential brownfield land, involving residents (the results of that review should be published prior to any consideration of green belt release anywhere in GM), should the review result in any requirement to release green belt in the future, the implications should be fully understood by local residents and the resulting changes can be addressed within Local Plans
- ensure consistency in the numbers in each of the supporting papers
- ensure all wording and graphics are representative of the facts and are not misleading for reviewers
- development, in conjunction with the local communities, of a vision for the area that covers a period of at least 30 years in accordance with NPPF paragraph 22
- provision of evidence that substantiates the viability of this Allocation, including visibility of the assumptions and contingency associated with the Viability Assessment
- development of KPIs to monitor the delivery of this Policy.

Furthermore, we believe the New Carrington Policy JP-Strat 11 (page 74), and the associated Allocation (JPA 33, page 357), are unsound due to the lack of compliance with a number of other Plan Policies, as set out in the paragraphs below. The reasons for the lack of soundness are included in those paragraphs.

We have not repeated these paragraphs in the response to JPA 33 (page 357) but they should be referred to when assessing that Allocation.

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Policy JP-Strat 11 (and Allocation JPA 33) compliance with Policy JP-Strat 13

We believe the New Carrington Policy (JP-Strat 11), and the associated Allocation (JPA 33, page 357), is not Effective as they cannot, as currently articulated, meet the requirements of Policy JP-Strat 13 Strategic Green Infrastructure.



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We agree totally with the fundamental premise of Policy JP-Strat 13, which states (page 77) that our green infrastructure “provides a range of vital environmental services, contributing to quality of life, supporting economic growth, and promoting good health by enabling recreation and active travel. It is an essential component of attractive and liveable places, and hence its importance must not be underestimated”.

It is with this in mind that we remind once again that the description of the New Carrington Policy (page 74) is completely disingenuous. The brownfield sites within the former Shell Carrington Industrial Estate already have planning approval and construction has commenced. The development for delivery within the Allocation is focused on and around the second largest peat moss in Greater Manchester, grade 2 best and most versatile agricultural land and large woodland areas. These areas are of particular significance (paragraph 4.79, page 77) and should be protected based on NPPF requirements (paragraph 174) and the statements made in this Policy JP-Strat 13 (carbon sequestration opportunities, managing local flood risk, providing essential habitats to red listed birds and endangered wildlife, supporting outdoor recreational activities and providing respite for both physical and mental health and wellbeing).

Furthermore, Policy JP-Strat 13 confirms (paragraph 4.79, page 77) that the protection includes accessibility yet much of the remaining green corridor (over 80 ha) is not accessible to the general public (it hosts, for example, United Utilities works, a solar farm, Manchester United’s training ground, Sale Sharks’ training grounds, Sale Rugby FC’s training grounds, some farmhouses, a large National Grid site and two riding centres). Accessibility will be further hampered by the dual carriageway that the Plan intends to build across that green corridor, along with 3 other major new roads, fracturing the routes for endangered wildlife, the foraging sources for over 20 red listed bird species and introducing danger for the children and families who currently use this totally traffic free area for recreational activities.

So, given Policy JP-Strat 13 (page 77) states that green infrastructure assets, such as GM’s Lowland wetlands and mosslands, will be “protected and enhanced as key features”, this New Carrington Policy is not sound as it cannot be Effective if other Policies within the Plan are to be complied with.

Modification:

We propose that the New Carrington Policy is removed from the Places for Everyone Plan as it is not Justified or Effective when considered against Policy JP-Strat 13. We believe that Carrington Moss should be protected, restored and enhanced to provide a nature-based solution to support the reduction in carbon emissions and the resulting air pollution (and to provide other benefits as outlined elsewhere in our response) as an alternative to development, this proposal can be included in the next iteration of Trafford’s Local Plan.

In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them.



Policy JP-Strat 11 (and Allocation JPA 33) compliance with Policy JP-Strat 14

We believe the New Carrington Policy (JP-Strat 11), and the associated Allocation (JPA 33, page 357), are not Effective as they cannot, as currently articulated, meet the requirements of Policy JP-Strat 14 A Sustainable and Integrated Transport Network.

We wholeheartedly support Policy JP-Strat 14 and agree that the future success of GM and its strategically important locations “will depend partly on the quality of public transport connections” (paragraph 4.80 page 78). Increasing public transport options both locally, regionally and nationally will bring huge advantages.



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Given that HS2 is being imposed across our green belt, it should be promoted for both passenger and freight transport. Yet there is no mention in the New Carrington Policy of the potential to utilise the HS2 line (Golborne Spur) in future to reduce road freight from the area, nor is there any mention of using the Manchester Ship Canal to support a modal shift of the huge volumes from HGV to water-based transportation. Furthermore, there is a former railway line that runs into the centre of the Allocation area which could have been proposed for restoration to secure sustainable freight and passenger traffic, yet there has been no consideration of this and other sustainable transport options since the conception of this Plan some 6 years ago. Resident requests for workshops to discuss their ideas for resolving local transport issues have not been addressed.

Like the Plan Objective 6 (page 41), Policy JP-Strat 14 (page 79) suggests that new development will be focused in locations close to existing and proposed public transport connections. New Carrington does not comply with this.

Despite Policy JP-Strat 14 confirming (page 79) that new development will have a significant role in reducing car dependency, the New Carrington Policy (with a planned 5,000 new homes and 350,000 m² employment space) includes no trams, no trains (despite the former rail line being available right into the heart of the location) and no commitment to improved bus services (we have validated this via an FOI request). In fact, bus services in this area have been withdrawn or diverted, reducing even further access to sustainable travel for local residents (whom the Plan acknowledges, paragraph 4.72, page 74, are “*currently served relatively poorly by public transport*”).

The only commitment in the Transport Delivery Plan (09.01.02) is to the Carrington Relief Road, with the New Carrington Masterplan (10.09.06) suggesting (page 52) that the strategic roads (there are plans to construct 4 in total, across this peat moss) will “*enhance the provision of sustainable transport*”. This is unlikely given the response to the FOI request and Trafford’s history of not investing in this area despite commitments in previous Development Plans (we have commented further about sustainable transport provision in our response to Q108).

The recommendation made in document 02.01.02 (Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020)) suggested that more detail should be provided about the transport network for the Allocation (paragraph 7.11 GM-Strat 11, page 62). The 2020 Updated Position (page 63) confirmed that the wording was not amended to include references to public transport because it was addressed by Policies which do not exist.

It should be noted that the New Carrington Allocation does not comply with Policy JP-C 3 as set out in our responses to Q70 and Q108.

This demonstrates that the New Carrington Policy is not focused on reducing the need to travel by car, the key aim within Policy JP-Strat 14. The availability of sustainable transport appears to be a distant dream, rather than the immediate priority. It is hard to understand why investment in improved public transport services (rather than the roads the buses would run on) could not be justified for an area with a combined current population of over 30,000 residents (Bowdon Ward, Bucklow St Martins Ward and St Marys Ward).

Modification:

We propose that the New Carrington Policy is removed from the Places for Everyone Plan as it is not Justified or Effective when considered against Policy JP-Strat 14. To meet the requirements of this and other Policies set out in the Plan, and the GM Transport Strategy 2040, no new major roads should be built, investment should be focused on sustainable transport as a priority.

This New Carrington Policy should be updated to demonstrate how the huge volumes of freight traffic in the area will move to more sustainable modes of transportation.



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In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them.

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Policy JP-Strat 11 (and Allocation JPA 33) compliance with Policy JP-S 1

We believe the New Carrington Policy (JP-Strat 11), and the associated Allocation (JPA 33, page 357), are not Positively Prepared as they are not consistent with the achievement of sustainable development, as set out in Policy JP-S 1 Sustainable Development (page 83).

Paragraph 7 of the NPPF states that “At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”. This suggests that Sustainable Development is not just about what products are used in the construction of buildings and roads. Looking at some very basic examples of what might constitute a future generation need, this could include their ability to breathe clean air, access healthy food sources with a low carbon footprint and have clean water to drink. So, at a very high level, it is fair to say that GM should not be proposing to build:

- on a peat moss, which has the potential to be restored to sequester carbon more effectively
- on grade 2 best and most versatile (BMV) agricultural land, which future generations may need to grow their food
- on wetland which has the ability to reduce flooding and support clean water strategies for the future.

As mentioned previously in this response, the brownfield sites in this Allocation area already have planning permission, so all references to these ‘parcels’ should be removed from the Allocation details. The Plan does not give appropriate weight to land in this Allocation which should be conserved for future generations. The land that remains within the scope of this Allocation is mostly peat moss (irreplaceable habitat), grade 2 BMV agricultural Land (as described in the New Carrington Topic Paper – see references below) and large areas of woodland habitats. Paragraph 5.4 (main document, page 83) suggests that the Plan will protect and enhance key environmental resources and it is clear that our moss lands and BMV agricultural land should only be developed if there are exceptional circumstances. We provide our argument about the lack of exceptional circumstances elsewhere in this response.

It should be noted that the GMSF Integrated Assessment 2019 (page 20 of the New Carrington Topic Paper) highlighted (see paragraph 8.4) that the previous iteration of this Plan had performed poorly against protecting the BMV agricultural land. In addition, the New Carrington Topic Paper (para 12.2 page 31) states that “*Carrington Moss is a former peat bog and initial investigation indicates a maximum thickness of peat of 3m, which thins towards the perimeter*”. Given this land is typically very wet (including during summer months), these large peat deposits should not be considered “*former*” peat moss. In addition, the North West Wetlands Survey 2, The Wetlands of Greater Manchester, completed in 1995 (published by the Lancaster University Archaeological Unit) even shows a photograph of Carrington Moss on its cover page. It states (page 71) in relation to Carrington Moss that “*325 hectares of peat survive*”, making it the second largest peat moss in Greater Manchester.

Paragraph 8.7 (page 21, New Carrington Topic Paper) confirms that, because the 2019 IA “*focused on each policy in isolation from other policies and that many of the recommended changes for the New Carrington allocation policy are already covered in other GMSF policies*”. This means that many recommendations have not been updated in the New Carrington Policy or supporting documents. We believe there is an over-reliance on the thematic policies (ie Sustainable and Resilient Places) covering these issues, which results in non-compliance at the Allocation level in the Plan.

It should be noted that the GMSF Integrated Assessment 2019 (page 20 of the New Carrington Topic Paper) also highlighted (see paragraph 8.4) that the previous iteration of this Plan had

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performed negatively against the IA objectives of resilience to the effects of climate change, reducing risk of flooding and conserving/enhancing landscape. Carrington Moss is extensively covered by surface water flooding for at least 6 months of every year (for photographs/video evidence showing the extent of this flooding, please take a look at the following webpage <https://friendsofcarringtonmoss.com/carrington-lake-2/> - the Friends of Carrington Moss have a dedicated page for what they call Carrington Lake). As stated above, we believe there is an over-reliance on the thematic policies (ie Sustainable and Resilient Places) covering these issues, which results in non-compliance at the Allocation level in the Plan.

In relation to sustainability, many commentators do only focus on how sustainable the design and development of construction projects are, how sustainably sourced the materials used will be and how attractive the new neighbourhood will become. This is certainly true of Trafford's own considerations within the New Carrington Masterplan (document 10.09.06), which mentions the word 'sustainable' 42 times. The section on Sustainability (4.9) states that it is *"part of a holistic design process that runs throughout all aspects of the scheme, including design and layout of buildings and landscape, the components of the masterplan, transport strategy and phasing"*.

Trafford suggests that delivery of the masterplan will result in sustainable transport, sustainable communities, sustainable society, sustainable economy, sustainable drainage and sustainable movements. Whilst we do not agree with these assertions, as set out elsewhere in this response, it is important to point out that at no point does Trafford mention that much of the irreplaceable peat moss and BMV agricultural land will be lost to future generations. In fact, in common with the New Carrington Topic Paper, the Masterplan describes the area (several times) as *"the former Carrington Moss"*.

In addition, the language used in the masterplan document does not bode well for future sustainability. Even in that specific section on Sustainability (page 55), developers are only *"encouraged"* to use sustainable sources of construction materials and the Government's forthcoming standards. Principle 9 (page 31) is another good example, which suggests sustainability will only be achieved *"where possible"*.

The NPPF has a clear focus on sustainable development. Paragraph 105, for example, states that *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."* Yet, for New Carrington, with a planned 5,000 new homes and 350,000 m2 employment space (clearly a significant development), there are no trams, no trains and no commitment to improved bus services (validated via our FOI request). In fact, bus services in this area have been withdrawn or diverted, reducing even further access to sustainable travel for local residents. The only commitment is to the Carrington Relief Road, with the masterplan suggesting (page 52) that the strategic roads will *"enhance the provision of sustainable transport"*. We believe the new roads set out in the plan will bring significant increases to air, noise and light pollution, affecting the health of both human and wildlife species. This is not consistent with this Policy, Trafford's declaration of a climate emergency (Nov 2018) nor Trafford's Carbon Neutral Action Plan (Dec 2020). We have commented further about sustainable transport provision in our response to Q108, New Carrington Allocation.

For the reasons set out above, development on this site cannot be considered to be sustainable, nor in accordance with this Policy.

Modification:

We propose that this site is removed from the Places for Everyone Plan. This will not impact the areas that already have planning approval as they are already under development. We believe Trafford should consider this site for transformation to a carbon and biodiversity bank as set out in our response to Policy JPA-33 New Carrington Allocation. This can be addressed in the next iteration of Trafford's Local Plan.



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In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them.

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Policy JP-Strat 11 (and Allocation JPA 33) compliance with Policy JP-S 2

We believe the New Carrington Policy (JP-Strat 11), and the associated Allocation (JPA 33, page 357), are not Justified as they are not consistent with the aim of delivering a carbon neutral Greater Manchester no later than 2038, as set out in Policy JP-S 2.

As stated elsewhere in our response, this policy focuses mostly on the carbon emissions from new buildings and sustainable energy systems. Nevertheless, it does recognise (para 5.6, main document, page 84) that to meet the proposed carbon commitments GM will need to *“increase the delivery of nature based solutions and biodiversity net gain”*. We do not believe that sacrificing irreplaceable habitat (peat moss) and BMV agricultural land is consistent with that policy.

In addition, it should be noted that this policy is also contrary to GM’s 5 year Environment Plan (2019) as set out in section 3.3.5 (Our Natural Environment), which states (page 58) that we must prioritise action to *“protect, maintain and enhance our key natural assets”*. Priority 1 is Managing our Land Sustainably, which includes (page 61) restoring *“50-75% of our peatlands”*. In addition, this document sets out responsibilities for Local Authorities, including local policy (page 63), which states:

- *“GMCA and LAs will embed a natural capital approach into strategy and plan development*
- *GMCA and LAs will support peatland restoration approaches and provide a clear framework for approach and delivery as part of a resilience strategy”*.

The North West Wetlands Survey 2, The Wetlands of Greater Manchester, completed in 1995 (published by the Lancaster University Archaeological Unit) states (page 71) stated, in relation to Carrington Moss, that *“325 hectares of peat survive”*, making it the second largest peat moss in Greater Manchester.

Developing on this peat moss will cause a massive carbon emission event and destruction of this irreplaceable habitat cannot be offset by any amount of Biodiversity Net Gain (to say nothing of the effect of that huge release of carbon into our local atmosphere and the impact on the health of both human and wildlife populations).

One of the many advantages of carbon sequestration via peatland is its own negligible carbon footprint. There is no requirement for manufacturing of major technology or equipment and no ongoing use of fossil-fuel based power (although we do recognise that restoration techniques might involve some initial machine-using groundwork and some installation of plastic dams or pipes). Peat mosses require relatively low maintenance, perhaps some weed incursion control, but mostly it is over to the forces of nature and time to deliver the benefits.

In comparison, most new buildings, however sustainably built, do not have the capability to capture carbon, and those that do cannot compete with the carbon sequestration capabilities of our peat mosses. In fact, such construction will result in a huge increase to carbon emissions locally (more heating, more cars on the road, more waste removal). Furthermore, as this article suggests – it takes over 50 tonnes of CO₂ to build the average UK house.

Conversely, in addition to their superior carbon capture capabilities, the restoration of our peatland habitats would bring numerous ecosystem benefits, such as water quality improvements, flood impact reduction, species recovery, biodiversity gains, wellbeing and climate cooling to name just a few. This wetland environment is a very effective tool which reduces the potential for local flooding (as mentioned previously, take a look at the Carrington Lake page of the Friends of Carrington Moss website for more information) and helps to dissipate polluted air, with the large areas of woodland on Carrington Moss also supporting carbon sequestration.



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Modification:

We propose that this site is removed from the Places for Everyone Plan unless and until there is clear evidence that the carbon emissions accruing from the development will have a more beneficial impact than the restoration of the peat moss. This can be addressed in the next iteration of Trafford’s Local Plan.

In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them.

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Policy JP-Strat 11 (and Allocation JPA 33) compliance with Policy JP-S 4

We believe the New Carrington Policy (JP-Strat 11), and the associated Allocation (JPA 33, page 357), are not Justified as they are not consistent with the aim of delivering resilience as set out in Policy JP-S 4, neither does it consider alternative options to enable GM to increase its resilience.

The Plan confirms (paragraph 5.24, main document, page 92) that “Greater Manchester aims to be one of the most resilient places in the world”. It recognises (paragraph 5.25, main document, page 92) that a “key part of achieving sustainable development is ensuring resilience”. It further recognises (same paragraph) that a “significant challenge within this is the ability to respond to future impacts from climate change”.

As mentioned elsewhere in our response, the New Carrington Policy area includes Carrington Moss, the second largest peat moss in Greater Manchester, and, as such, is highly significant to GM’s efforts to combat climate change. The protection and restoration of our peatlands is vital in the transition towards a low-carbon economy and in the prevention of catastrophic repercussions from extreme weather events. Not only are our peatlands now recognised as the largest natural carbon store, they also provide other vital ecosystem services, minimising the risk of flooding and preserving important ecological and archaeological information. Damaging our peatlands will also result in significant biodiversity loss.

Green belt and protected open land in the New Carrington Policy area currently provide protection to local communities from the inevitable flooding that will follow if that land (which is currently soaking up significant volumes of water) is built on. It is inconsistent with the aim of delivering resilience to construct roads, houses and employment space on such land. As mentioned elsewhere in this document, there are photographs and videos showing the extent of the surface water flooding on the Friends of Carrington Moss website at this link <https://friendsofcarringtonmoss.com/carrington-lake-2/>.

We set out in our response to the Allocation itself, the alternative strategies the Friends of Carrington Moss has proposed to Trafford, including alternative sites for housing and employment land supply. What is clear is that there are no other places in Trafford where we can:

- restore peat - to more effectively capture carbon, so our children and grandchildren can breathe cleaner air
- grow crops and alleviate surface water risks, so our descendants have fresh food, with a low carbon footprint, and residents are not fearful of flooding every time it rains
- generate significant increases to the populations of red listed birds and endangered wildlife, so we can help nature’s recovery, increase biodiversity and mitigate the impact of climate change.

As mentioned earlier in this response, much (over 80 ha) of the reduced green belt corridor that remains post the proposed development is not accessible to the general population. That figure (80 ha) does not include the planned land-take for the 4 major new roads that are proposed for construction across Carrington Moss. Wildlife corridors will be drastically fractured by those new



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major roads (especially the dual carriageway that is proposed for the Carrington Relief Road), with both human and wildlife populations being exposed to the dangers of air, noise and light pollution and traffic accidents. The size, spread, quality and interconnectedness of the green infrastructure in the New Carrington Policy area will not be increased, it will be significantly diminished and seriously weakened. This New Carrington Policy is not, therefore, Justified as it is not in alignment with the aims for resilience set out in Policy JP-S 4.

As mentioned elsewhere in this document, Trafford has a much lower than GM average proportion of green belt land (37.6% against a regional average of 46.7%), if the Plan goes ahead, that lower proportion will become even more marked (35% against a regional average of 45%). Furthermore, whilst the average net loss of green belt across the 9 Boroughs is 3.27%, for Trafford it will be 6.7%.

Added to this, the Electoral Wards most impacted by the New Carrington Policy have some of the lowest figures in relation to access to green space in Trafford. Interestingly, document 07.01.20 (Stage 2 GM Green Belt Study - Beneficial Use - Appendix I – Trafford) considers the Green and Open Space Assessment (2009), which is very dated and should have been renewed to support this Plan. It suggests that the Wards in the Allocation area have sufficient green space, yet more recent data from Trafford Data Lab

(https://www.trafforddatalab.io/ward_profiler/?theme=Environment&name=Area%20covered%20by%20green%20space), gives a very different picture (2020), with Bowdon Ward having just **3.6%** green space, Bucklow St Martin's just **4%** and St Marys just **6.1%** compared with Flixton and Longford which both have over 25% of their Wards covered by green space

This means that some of the most vulnerable people in Trafford are being disproportionately impacted by the loss of green belt as Trafford is concentrating delivery of a huge proportion of its housing and employment targets in one location.

Reducing access to green space for these residents, especially those in Bucklow St Martins Ward, which ranks very poorly on the Index of Multiple Deprivation (42.5% - the highest in Trafford - source:

https://www.trafforddatalab.io/ward_profiler/?theme=Deprivation&name=Index%20of%20Multiple%20Deprivation), when there is also inequity of access to green belt land, is unacceptable and contradicts with the aim of supporting healthier lifestyles and minimising the potential negative impacts on health, including air pollution, which we will cover in our response to that policy. Free access to a large area of open green space, which has wonderful landscape views, fresh, clean air, access to nature and an interesting range of habitat types, has a huge, positive impact on the mental and physical health of local residents.

Hazardous Installations

The Allocation area already contains a number of hazardous installations and there are several more in very close proximity. Some of these businesses are assessed by the HSE as in the Upper Tier of hazard (meaning that their business involves processing, transporting or storing highly dangerous substances). Whilst it is clear that these organisations have excellent processes in place to manage and control risks, to increase the population (of both residents and employees) in an area that may have to be evacuated in the event of an incident, a disaster or an emergency arising, is irresponsible. It should be noted that, as some of these businesses are in very close proximity to each other, it is also possible that a ricochet reaction could be caused by an incident in just one of the installations. This issue was raised by the Chair of Trafford's Planning Committee during a discussion about a planning application in Carrington

(<https://www.youtube.com/watch?v=vAJEVF21lb0>, Trafford Council Planning and Development Management Committee - 6:30pm Thursday 5th March 2020).

There is only one road which passes through the area, which could make any urgent evacuation very, very difficult. The proposed Carrington Relief Road will not relieve this situation. Despite resident support for a road bridge across the Manchester Ship Canal (this is discussed further in



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our response to the Allocation itself), the fact that constructing such a bridge was highlighted for consideration in the 2006 UDP and the 2012 Core Strategy and that this solution would resolve a number of current freight transport, air pollution and other issues, Trafford has not included this option in the New Carrington Policy/Allocation area plans.

With this in mind, we believe this New Carrington Policy is not only not Justified, it would be reckless and negligent to increase the risk to existing and new populations of residents (mainly families) and employees by increasing the number of people who may have to be quickly, safely and effectively evacuated from the area.

It should be noted that we believe the graphic (Figure 6: New Carrington COMAH zones Constraints Plan, page 33 New Carrington Topic Paper) is not up to date. It appears to include a site that is currently under development for housing. We are also surprised not to see Carrington Power Station on the list and the other sites that are in close proximity.

The New Carrington Masterplan also mentions the sites located within the New Carrington Policy area (page 34) and states that *“the effect of these on future residential and commercial developments has been considered in the masterplan”*. Yet there is no reference within the masterplan to evacuation of residents or employees who could be affected by an incident, an emergency or a disaster and how this would be achieved quickly, safely and effectively.

Modification

We propose that the New Carrington Policy is removed from the Places for Everyone Plan as it is not Justified when considered against Policy JP-S 4. An evacuation policy for the Carrington area should be developed in collaboration with local Parish Councils and can be included in the next iteration of Trafford’s Local Plan.

In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them.

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Policy JP-Strat 11 (and Allocation JPA 33) compliance with Policy JP-S 5

We believe the New Carrington Policy (JP-Strat 11), and the associated Allocation (JPA 33, page 357), are not Justified as they are not consistent with the aim of reducing flood risk as set out in Policy JP-S 5, nor does it consider alternative options to enable GM to increase its resilience.

The document confirms (paragraph 5.33, page 94, main document) that *“Climate change is expected to significantly increase peak river flows and surface water run-off as a result of more intense rain events”* and that this could place *“more properties at risk in the future unless flood defences, drainage and run-off management are improved”*.

We agree totally with this prognosis and it is clear that flooding not only damages property, it impacts the mental and physical health of both human and wildlife populations. We are, therefore, astounded that, having stated (paragraph 5.34, page 95, main document) that the aim of the Sequential and Exception Tests is to *“steer new development towards areas with the lowest risk of flooding first, before considering higher risk locations”*, that a wetland area with a long history of extensive surface water flooding has been included in the Plan with a view to development rather than protection.

The Policy itself states (page 96, point 3) that the aim is to locate development *“to minimise the impacts of current and future flood risk”*. As mentioned in other responses, the land that is in scope for development at New Carrington is covered by extensive surface water flooding for at least 6 months of every year (including in the summer months when there is heavy rain). The



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Friends of Carrington Moss have both photographic and video evidence of the extent of this flooding on their website at this link <https://friendsofcarringtonmoss.com/carrington-lake-2/>.

Furthermore, when linking this policy (JP-S 5) to the previously discussed Policy JP-S 2 (Carbon and Energy, main document page 88), point 6 includes the aim to increase the range of nature-based solutions, including flood management techniques. We believe that Carrington Moss offers an ideal opportunity to do that, as an alternative to development which would result in a high risk of flooding, not only for new residents but for those in surrounding neighbourhoods.

Modification:

We propose that the New Carrington Policy is removed from the Places for Everyone Plan as it is not Justified when considered against Policy JP-S 5. We believe that Carrington Moss should be protected, restored and enhanced to provide a nature-based solution to minimise flood risk (and provide other benefits as outlined elsewhere in our response) as an alternative to development, this proposal can be included in the next iteration of Trafford’s Local Plan.

In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them.

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Policy JP-Strat 11 (and Allocation JPA 33) compliance with Policy JP-S 6

We believe the New Carrington Policy (JP-Strat 11), and the associated Allocation (JPA 33, page 357), are not Justified as they are not consistent with the aim of improving air quality as set out in Policy JP-S 6, it does not include evidence about the existing or predicted future air pollution in the Policy area, nor does it consider alternative options which would reduce air pollution in the Policy area, without increasing it for other communities.

As mentioned elsewhere in our response, the New Carrington Policy area is based on and around Carrington Moss, the second largest peat moss in Greater Manchester, which is currently dispersing the highly polluted air in the New Carrington Policy area. The extensive development plans set out within the New Carrington Policy will significantly reduce the existing wetlands area and will compromise the potential for the remaining peat moss to be effectively restored, given the plans include 4 major new roads, including a dual carriageway. In addition, the excessive industrial and warehousing developments will bring significant additional numbers of HGVs onto local roads, thus increasing air, noise and light pollution for local residents and wildlife.

The New Carrington Topic Paper confirms (paragraph 10.4, page 24) that the *“allocation is located close to two major motorways (M62 and M60) and a series of lower-tier routes”*. These routes have high levels of traffic, particularly HGVs, and the area is on the flight path for Manchester Airport, which also brings significant levels of air pollution. Furthermore, many of the existing businesses in Carrington have high numbers of HGVs on the local roads (Air Products, Owens Haulage and traffic associated with the Power Station to name just three) and some businesses are also polluters themselves (Basell, for example, has a flare stack and Saica paper does copious amounts of burning). All of which means that there are already challenges for air quality in this area.

These air quality challenges could be alleviated by:

- removing the New Carrington Policy from the Plan (bearing in mind that the developments on the brownfield sites already have planning approval and the remaining developments are on green belt or protected open land, much of which is peat moss, grade 2 BMV agricultural land or woodland habitats)
- serious consideration should be given to all the alternative options for sustainable transport for the area.



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As set out at the beginning of this New Carrington Policy response, some of the developments currently included in the allocation area have already been given planning permission, including over 250,000 m² of additional industrial and warehousing employment space. The Clean Air Policy itself states (point 4, page 101) that GM will restrict and carefully regulate “*developments that would generate significant point source pollution such as some types of industrial activity and energy generation*”. We believe the Carrington area has already contributed more than its share of industrial and warehousing space in GM and it would be contrary to this policy and inequitable for local residents to suffer the health impacts from the proposed (almost 100,000 m²) further industrial and warehousing employment space, particularly because of the additional air pollution residents will be exposed to.

The Clean Air Policy itself states (point 1, page 100) that development should be located “*to reduce reliance on forms of transport that generate air pollution*” and (at point 11, page 101) to “*maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users*”. Given that there are no plans in the New Carrington Policy area for trains or trams and, as we have mentioned elsewhere, there are no commitments to improved bus services, the New Carrington Policy cannot be considered to meet these objectives.

The major contribution to air pollution caused by transport is outlined in paragraphs 5.39 (page 96) to 5.51 (page 100), including the huge impact on human health and wellbeing. The resident population of Bucklow St Martins Ward alone will increase by over 72% as a direct consequence of the Allocation development (and by over 90% when other, already approved, planning applications in the Ward are considered). We set out elsewhere in our response the implications of the New Carrington Policy on the local area, the impact on local health services and the lack of school places within the Allocation area. In addition, the excessive overdevelopment of industrial and warehousing space means that traffic in the area will increase exponentially, not only because there will be significant increases in the number of HGVs on local roads, but also because employees travelling to Carrington will, in the main, have to use their cars (due to the lack of public transport options mentioned above). We are aware that business are bringing their employees with them when they move to Carrington which means many of their employees are travelling from other locations to Carrington to work, including from outside the Borough.

All in all, this results in a significant increase in road traffic and the associated air pollution in the New Carrington Policy area. Yet, there is no evidence provided within the documentation about specific current air pollution levels for the New Carrington Policy area, nor any predictive analysis setting out what the air pollution levels are likely to be once the developments are completed. Whilst NO₂ emissions may be somewhat addressed by the Clean Air Plan (set out at paragraph 5.48, page 100), we expect there to be a substantial increase of PM_{2.5}, impacting the health and wellbeing of local residents and wildlife if the Allocation goes ahead as currently planned.

In addition, the location of the dual carriageway, to be known as the Carrington Relief Road, will bring huge volumes of traffic close to the Sale West residential area, increasing air, noise and light pollution. The Transport Locality Assessment (TLA) anticipates (paragraph 6.3.1, page 67) that the majority of the traffic from the New Carrington Policy area (70+%) will travel to the Carrington Spur (the local road leading to the M60 from the Sale West area). The TLA goes on to confirm a plan to widen the East-bound Carrington Spur route (page 113, Necessary Strategic Interventions), yet it is the West-bound traffic that will most affect the air quality for a local primary school (which abuts the Spur). This traffic, including significant numbers of HGVs, is already queuing at the traffic lights, with their engines running, often belching out fumes, including high levels of PM_{2.5}.

We have repeatedly requested information about traffic numbers in the area for more than 18 months, without success. The numbers set out in the TLA for Trafford (documents 09.01.15 and 09.01.27) are confusing and we have raised elsewhere in our response the lack of consistency between the various documents supporting the Plan, and the numbers (housing and employment) related to the New Carrington Policy area. It is clear, however, that the traffic numbers (Table 6



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page 66 and Table 3 page 17) set out in the TLAs respectively, purporting to show the additional traffic to be generated by the New Carrington Allocation are grossly under-estimated. It is unclear whether these numbers include employment traffic and any representation in relation to HGV volumes.

In relation to document 09.01.15, there is no access to the data included in the Reference modelling scenario mentioned in paragraph 6.2.1 (page 65 of the TLA). This is extremely important as they have assumed that all the HGV and other employment traffic is included in this data (paragraph 6.2.3, page 65).

For document 09.01.27 there is no access to the reference case committed development traffic numbers (mentioned in paragraph 4.1.3, page 15). This data is needed to validate the very low figures estimated in these documents.

It should also be noted that the numbers mentioned above do not appear to take into consideration any traffic from outside the New Carrington Policy area (typically Lymm and Warrington) which, as highlighted in the TLA (09.01.15, paragraph 11.2.3, page 106), will be attracted by the proposed dualling “to the strategic route corridor along the Carrington Relief Road, Carrington Spur and M60 Junction 8”, bringing yet more pollution to the area.

It is GM’s ambition, as set out in the GM Transport Strategy 2040 (page 8) that, by 2040, “50% of all journeys in Greater Manchester are made by public transport or active travel, supporting a reduction in car use to no more than 50% of daily trips”. With this in mind, we do not believe Trafford should be constructing more roads, there should be a clear and serious focus on the options for more sustainable journeys for both passenger and freight traffic, especially given that the location is right next to the Manchester Ship Canal.

Furthermore, the Clean Air Policy states (point 10, page 101) that GM is aiming to promote “actions that help remove pollutants from the air”. We believe the restoration of our peat mosses, including Carrington Moss, will provide a strong nature-based solution to significantly support air quality improvements, particularly the removal of pollutants from the air.

This is even more important given that the [World Health Organisation](#) has announced (22nd September 2021) that it is reducing the maximum safe levels of key pollutants with PM_{2.5}: reduced from 10 µg/m³ to 5 µg/m³ (NB the legal limit is 20 µg/m³) and NO₂: reduced from 40 µg/m³ to 10 µg/m³ (NB the legal limit is 40 µg/m³). These levels will be phased towards the 2030 target date but this is clearly something that should be considered when reviewing this Plan.

The New Carrington Policy, which includes the construction of buildings and roads on local peat mosses, will cause a massive carbon emission event, releasing huge amounts of carbon into our local atmosphere, impacting the health of both human and wildlife populations. Trafford has not considered the alternative of protecting, restoring and enhancing the second largest peat moss in GM.

Modification:

We propose that the New Carrington Policy is removed from the Places for Everyone Plan as it is not Justified when considered against Policy JP-S 6. We believe that Carrington Moss should be protected, restored and enhanced to provide a nature-based solution to support the reduction in carbon emissions and the resulting air pollution (and to provide other benefits as outlined elsewhere in our response) as an alternative to development, this proposal can be included in the next iteration of Trafford’s Local Plan.

In addition, we would also request that data related to the Reference Modelling Scenario (mentioned in paragraph 6.2.1, page 65 of the TLA) is made available in an easily readable format for residents to consider whether it is complete and reasonable, along with the other data we have



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requested for traffic volumes. The data related to current and predicted air pollution levels and carbon emissions for each Allocation area should also be provided as key evidence to this plan.

In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them.

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Policy JP-Strat 11 (and Allocation JPA 33) compliance with Policy JP-G 4

As an area of lowland wetland and mossland, we believe the New Carrington Policy (JP-Strat 11), and the associated Allocation (JPA 33, page 357), are not Justified and Not Consistent with National Policy as they propose development on irreplaceable habitat. They are also not consistent with Policy JP-G 4 Lowland wetlands and mosslands.

The Policy recognises (paragraph 8.26, page 155) that areas of Lowland Wetland and Mossland have significant green infrastructure (GI) and are rich in biodiversity and geodiversity resources. The Policy goes on to confirm that (paragraph 8.27, page 155) considerable ecological benefits can be achieved through habitat restoration. The paragraph also demonstrates the significant value of these habitats, not only in support of Nature Recovery and the health and wellbeing of residents, but also in GM's action plan to mitigate climate change and achieve carbon neutral goals (reducing a significant source of emissions and locking in additional carbon).

The weight that should be afforded to the importance of retaining these habitats is further reinforced in paragraph 8.28 (page 155), which not only confirms the unique range of wildlife that is supported in this environment but also that *"lowland raised bog is now one of Western Europe's rarest and most threatened habitats"*.

Whilst Policy JP-G 4 does propose (paragraph 8.30, page 156) that *"Some sections of undeveloped mossland, however, are considered appropriate for future development."* We have strongly contested this, as we believe all mossland in GM should be targeted for restoration to support GM's climate action plan and its carbon neutral goals.

Despite this we would be keen to understand what evidence has been prepared to demonstrate that Carrington Moss has *"limited ecological value"* (paragraph 8.30, page 156) to give merit to the decision to include it within an Allocation in this Plan. We can find no evidence in the Plan that sets out the ecological value of those Allocations that are in areas of undeveloped mossland. This information should be provided before a decision is made about those Allocations, particularly as we understand that green belt will be released on the day this Plan is approved. If such information is not available, the Allocation should be withdrawn from this Plan and handled through the Local Plan process, once the required information is available.

The Natural Environment Topic Paper further confirms the significance of this habitat (page 40/41) in setting out the advice received from Natural England about the necessity of safeguarding GM's soil resources that have high environmental value. This includes deep peaty soils as they bring huge natural capital benefits. We believe great weight should be given to the Natural England advice (as set out in our response to Q53 relating to Policy JP-G 4). With this in mind, further information is needed to support decision-making about Allocations which feature lowland wetland and mossland habitats, such as a clear assessment of the impact on soils, as highlighted by Natural England.

Natural England goes on to suggest (Natural Environment Topic Paper, paragraph 3.54, page 41) that the Plan should (i) safeguard the long term capability of BMV agricultural land as a resource for the future, (ii) avoid development that would disturb or damage other soils of high environmental value and (iii) ensure GM's soil resources are conserved and managed in a sustainable way.



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Being compliant with the Natural England guidance will also ensure compliance with National Policy (as highlighted in paragraph 3.55, page 41).

For the reasons set out above, we believe the New Carrington Policy is not Justified.

In addition, the New Carrington Policy is not Effective. Accepting development on these unique habitats will not only destroy areas rich in rare biodiversity and wildlife (England Peat Action Plan, page 10), such developments will be complex and expensive (hence the New Carrington Allocation, JPA33, only proposing an Affordable Housing contribution of 15% on green belt land). The peat will have to be removed or piled. Either solution will release significant levels of carbon into the local atmosphere. The area will then need to be infilled (another expense and more carbon contributions as HGVs will bring the infill to the site). So, this Policy is not only expensive in financial terms, it also brings a high cost to the health of local residents and wildlife.

We also believe some aspects of this Policy are not Consistent with National Policy.

In recognising that re-wetting peatland areas and returning them to their natural state could make a significant contribution to achieving targets for reducing carbon emissions, in addition to the other benefits of improved water quality, nature and flood mitigation, the [England Peat Action Plan](#), published in May 2021, page 4, sets out the vision to reverse the decline of England's peatlands, with the aim of preventing further loss of peatland habitats and to restore more peatland landscapes to their natural state.

Whilst we understand NPPF paragraph 210 (page 59) refers to the extraction of peat for commercial purposes, we believe the extraction or piling of peat to support developments in Lowland Wetland and Mossland areas does not meet the spirit of this NPPF requirement.

Furthermore, as mentioned above, NPPF paragraph 174 (page 50) confirms the expected protections for sites such as these.

The NPPF defines irreplaceable habitats (page 68) as those that would be *“technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity”*. Whilst Lowland Wetland and Mossland is not explicitly included as an example, these sites, such as Carrington Moss, should be considered to be irreplaceable habitats as it is known that peatlands take thousands of years to form and [they only generate 1 millimetre of peat each year](#).

We note that document 02.01.02 (Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020)) suggests (paragraph 8.2, page 71, GM-S 2, 2019 IA recommended enhancement and mitigation) that *“The multifunctional and multibeneficial nature of carbon sequestration sites could be explained”*. The 2020 Updated Position (page 71) confirms that no amendments have been made but that the Carbon and Energy Policy should *“include appropriate and suitable references to the multi-functional and benefits of carbon sequestration sites and the climate emergency agenda”*. Whilst point 6 of this Policy (page 88) does reference increasing the range of nature-based solutions, this is an isolated mention, the Policy itself is heavily focused on the carbon impacts of housing and employment development (it does not mention, for example, the carbon impact of new road schemes).

Modification:

For the reasons set out above, we propose that the New Carrington Policy is removed from the Places for Everyone Plan as it is not Positively Prepared or Justified when considered against Policy JP-G 4, nor is it Effective, or Consistent with National Policy. We believe that Carrington Moss should be protected, restored and enhanced to provide a nature-based solution as an alternative to development, to support the reduction in carbon emissions and the resulting air pollution and to provide other ecosystem and health benefits as outlined elsewhere in our response. This proposal, which should set out how high value (peaty) soil resources will be



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conserved and managed in a sustainable way, can be included in the next iteration of Trafford's Local Plan.

In addition, we would also request that the evidence showing the ecological value of those Allocations that are in areas of undeveloped mossland, including New Carrington, is provided. If this information is not available, the Allocation should be withdrawn from the Plan and handled through the Local Plan process, once the required information is available. In addition, the data suggested by Natural England, related to the impact of soil resources, should also be provided (in advance of making decisions) as key evidence to this Plan.

Furthermore, we believe the New Carrington Policy should explicitly incorporate the advice from Natural England (Natural Environment Topic Paper, paragraph 3.54, page 41).

In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them.

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Q32 Policy JP-Strat 12 Main Town Centres

We welcome the recognition in this Policy (paragraph 4.76 page 76) that the retail market is changing. This transformation has been accelerated by the pandemic due to increasing use of online shopping. Innovative ways of utilising space will be needed (sharing space between the daytime and night-time economy) in addition to expanding the resident populations (paragraph 4.77 page 76), to achieve the potential for each town centre.

As mentioned in paragraph 4.76, page 76, communities and businesses collaborating to determine the future of their town centre is essential. It is surprising that the Policy is not advocating the use of Neighbourhood Business Plans, such as the one developed for Altrincham <https://www.trafford.gov.uk/planning/strategic-planning/local-plan/altrincham-neighbourhood-business-plan.aspx> alongside the Mayor's Town Centre Challenge.

In addition, the KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with them

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- consideration of the inclusion of a recommendation that the Main Town Centres produce a Neighbourhood Business Plan
- a commitment to extending the KPIs, set out on page 392, to include all Policies within the Plan.



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Places for Everyone Response

Q33 Policy JP-Strat 13 Strategic Green Infrastructure

This Policy asserts (paragraph 4.78, page 77) that the importance of our green infrastructure “*must not be underestimated*” as it provides a “*range of vital environmental services, contributing to quality of life, supporting economic growth, and promoting good health by enabling recreation and active travel. It is an essential component of attractive and liveable places.*”

It goes on to state that (paragraph 4.79, page 77) protecting and enhancing the green infrastructure network “*(including its accessibility) is central to the overall vision*” of the Plan. Yet, the Key Locations and Assets listed at paragraph 4.2 (page 46) of the Strategy limits the mention to one sentence, rather than identifying some of our most important green spaces (the irreplaceable habitats, such as GM’s ancient woodlands and peat mosses).

It is worth repeating that the document highlights that the specific green infrastructure assets, set out in the Policy (page 77), “*make a major contribution to the character of different parts of Greater Manchester, are key components of the wider network of habitats, and often fulfil other important functions such as managing flood risk, providing recreation opportunities and sequestering carbon*”, particularly given that the Policies do not focus on their green infrastructure assets in equal measure to their economic goals.

The Policy for Port Salford (JP-Strat 4, page 57), for example, does not mention that the development will result in the release of 109 hectares of green belt - grade 1 best and most versatile agricultural land and peat moss, both of which should be protected based on NPPF requirements (paragraph 174) and the statements made in this Policy (carbon sequestration opportunities).

The New Carrington Policy (page 74) is probably the most disingenuous. As mentioned elsewhere in our response, the suggestion (paragraph 4.70, page 73) that the Policy enables redevelopment of the extensive former Shell Carrington industrial estate is incorrect. These brownfield sites already have planning approval and construction has commenced. The development within the Allocation is focused on and around the second largest peat moss in Greater Manchester, grade 2 best and most versatile agricultural land and woodland habitats. As mentioned above, these areas should be protected based on NPPF requirements (paragraph 174) and the statements made in this Policy (carbon sequestration opportunities).

So, despite the Policy (page 77) stating that green infrastructure assets, such as GM’s Lowland wetlands and mosslands, will be “*protected and enhanced as key features*”, this Policy is not sound as it cannot be Effective if these statements are not addressed in other Policies set out within the Strategy section of the Plan and in the Allocations themselves.

The KPIs set out at page 392 of the document should be extended to include all Policies within the Plan, including monitoring that each Allocation complies with this Policy.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- a commitment to this Policy being robustly enforced throughout the Plan and its Allocations to ensure it is adhered to throughout the Plan period.
- a commitment to the monitoring of the protection and enhancement of strategic green infrastructure assets through appropriate KPIs. Those set out on page 392, do not currently support monitoring of adherence to this Policy and must be extended.

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Places for Everyone Response

Q34 Policy JP-Strat 14 A Sustainable and Integrated Transport Network

We wholeheartedly support this Policy and agree that the future success of GM and its strategically important locations *“will depend partly on the quality of public transport connections”* (paragraph 4.80 page 78).

Increasing public transport options both locally, regionally and nationally will bring huge advantages. Given that HS2 is being imposed across our green belt, it should be promoted for both passenger and freight transport. We certainly agree with the sentiments expressed in paragraph 4.83 (page 78) that the costs involved in constructing and operating GM’s rapid transport routes *“make it essential that their benefits are maximised”*. The approach set out in that paragraph will reinforce GM’s refreshed Transport Strategy 2040, which states (Transport Strategy 2040, page 8) that *“by 2040 - 50% of all journeys in Greater Manchester are made by public transport or active travel, supporting a reduction in car use to no more than 50% of daily trips”*.

Yet, for New Carrington, with a planned 5,000 new homes and 350,000 m2 employment space (clearly a significant development), the Plan includes no trams, no trains (despite a former rail line being available right into the heart of the location) and no commitment to improved bus services (validated via our FOI request). In fact, bus services in this area have been withdrawn or diverted, reducing even further access to sustainable travel for local residents (whom the Plan acknowledges, paragraph 4.72, page 74, are poorly served by public transport). The only commitment in the Plan is to the Carrington Relief Road, with the New Carrington Masterplan (10.09.06) suggesting (page 52) that the strategic roads (there are plans to construct 4 in total, across a peat moss) will *“enhance the provision of sustainable transport”*. This is unlikely given the response to the FOI request and Trafford’s history of not investing in this area despite commitments in previous Development Plans (we have commented further about sustainable transport provision in our response to the New Carrington Allocation).

We believe the new roads set out in the Plan will bring significant increases to air, noise and light pollution, affecting the health of both human and wildlife species. This is not consistent with this Policy, Trafford’s declaration of a climate emergency (Nov 2018) and Trafford’s Carbon Neutral Action Plan (Dec 2020).

GM should, therefore, strengthen this Policy to encourage more use of the public transport networks being funded by public money. There should be no investment in new major roads, this will be counter-productive from the perspective of both increasing the use of public transport and the aim to move freight to more sustainable means of haulage.

GM should require Allocations and future Local Plans to adhere to this Policy.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- an update to strengthen this Policy confirming there will be no investment in new major roads
- initiatives should be established to support increasing the use of public transport (such as lower fares, more frequent and reliable services)
- freight traffic should be encouraged to move to more sustainable means of haulage (via both incentives and penalties)
- a commitment to this Policy being robustly enforced throughout the Plan and its Allocations to ensure it is adhered to throughout the Plan period.
- a commitment to the monitoring of achievement of this Policy through appropriate KPIs.



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Q35 Policy JP-S 1 Sustainable Development

We strongly support the concept of truly Sustainable Development and the core objective, which is summarised in paragraph 5.1 (page 83). In matching the NPPF, paragraph 7, summary that “*At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs*” the Policy suggests that Sustainable Development is not just about what products are used in the construction of buildings and roads. Looking at some very basic examples of what might constitute a future generation need, this could include their ability to breathe clean air, access healthy food sources with a low carbon footprint and have clean water to drink. So, at a very high level, it is fair to say that GM should not be proposing to build:

- on irreplaceable habitats, which cannot, by definition, be replaced elsewhere, including, for example, our peat mosses, which have the potential to be restored to sequester carbon more effectively
- on grade 1 or grade 2 best and most versatile (BMV) agricultural land, which future generations may need to grow their food
- on wetland which has the ability to reduce flooding and support clean water strategies for the future.

The Policy confirms (paragraph 5.3, page 83) that sustainability is “*central to this Plan and will contribute to Greater Manchester tackling climate change*”. It goes on to suggest (paragraph 5.4, page 83) that sustainable development is “*reflected in the overall strategy, the proposed scale and location of development, and the individual policies and allocations*”. We disagree and provide an example below and in our more detailed response about the New Carrington Allocation (JPA 33) to demonstrate that the Allocations are not following this Policy.

In relation to sustainability, the Plan seems to focus on how sustainable the design and development of construction projects are, how sustainably sourced the materials used will be and how attractive the new neighbourhood will become. This is evidenced in the New Carrington Masterplan (document 10.09.06), which mentions the word ‘sustainable’ 42 times. The section on Sustainability (4.9) reinforces this focus on design and development. At no point in the Masterplan does Trafford mention that much of the irreplaceable peat moss, BMV agricultural land and woodland habitats will be lost to future generations.

In addition, the language used in the Masterplan document (10.09.06) does not bode well for future sustainability. Even in that specific section on Sustainability (page 55), developers are only “*encouraged*” to use sustainable sources of construction materials and the Government’s forthcoming standards. Principle 9 (page 31) is another good example, demonstrating that sustainability will only be achieved “*where possible*”!

The NPPF has a clear focus on sustainable development. Paragraph 105, for example, states that “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*” Yet, for New Carrington, with a planned 5,000 new homes and 350,000 m2 employment space (clearly a significant development), there are no trams, no trains and no commitment to improved bus services. The only commitment is to the Carrington Relief Road, with the masterplan suggesting (page 52) that the strategic roads will “*enhance the provision of sustainable transport*”. We believe the new roads set out in the plan will bring significant increases to air, noise and light pollution, affecting the health of both human and wildlife species. This is not consistent with this Policy, nor with Trafford’s declaration of a climate emergency (Nov 2018) or Trafford’s Carbon Neutral Action Plan (Dec 2020). We have commented further about sustainable transport provision in our response to the New Carrington Allocation (JPA 33).

We believe this Policy should be robustly enforced throughout the P4E Plan and its Allocations. The Plan does not currently give appropriate weight to land which should be conserved for future generations. Paragraph 5.4 (main document, page 83) suggests that the Plan will protect and enhance key environmental resources and, it is clear that irreplaceable habitats, such as ancient



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woodlands, peat moss lands and BMV agricultural land, should only be developed if there are very exceptional circumstances. We provide our argument about the lack of exceptional circumstances elsewhere in this response. With this in mind, we believe the Policy should be significantly strengthened to ensure it is robustly adhered to, throughout the Plan, both within the Allocations and in future development applications in the Region.

Paragraph 5.4 goes on to suggest that this Policy supports the Plan in “*combating and adapting to climate change, reducing carbon emissions to meet Greater Manchester’s 2038 carbon neutrality target date, supporting high levels of economic growth in a way that can benefit all residents, and delivering sustainable patterns of development that minimise the need to travel and reliance on the car*”. This is not evidenced in the Allocations and further to the points raised elsewhere in our responses about the omission of the rural economy, the Plan does not support high levels of economic growth that benefits those residents who live or work in our rural areas.

This is an essential Policy for the P4E Plan and for the reasons set out above, it is currently not Effective, as it is not being adhered to within the Allocations.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- a commitment to this Policy being robustly enforced throughout the Plan and its Allocations to ensure it is adhered to throughout the Plan period
- withdrawal of any Allocations that do not meet the requirements of this Policy
- a commitment to the monitoring of achievement of sustainable development through appropriate KPIs. Those set out on page 392, do not currently support monitoring of adherence to this Policy and must be extended.



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Q36 Policy JP-S 2 Carbon and Energy

We note that paragraph 5.5 (main document, page 84) confirms that GM's vision is to be *"at the forefront of action on climate change"*. With this in mind, the Policy should be significantly strengthened and, given GM's 5-year Environment Plan and the Government's Peat Action Plan, we believe this Policy should include a proposal for a complete moratorium that prevents any construction on GM's peat mosses. These should be restored in accordance with those two documents.

We do not believe this policy has been Positively Prepared as there is a huge gap (both in the Policy itself and in its associated documents) relating to information about increasing the range of nature-based solutions (point 6, page 88).

In addition, document 04.01.03 (Carbon and Energy Implementation Part 2 - Carbon Offsetting 2020) suggests that (page 27) *"To be found sound plans must include; an understanding of baseline carbon dioxide emissions within the council area, the emissions inherent in future development and how the council's actions and policies will reduce emissions in line with this trajectory to net zero"*

We do not believe this information is available.

Furthermore, document 02.01.02 (Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020)) confirms (within the 2020 Updated Position for New Carrington, page 63) that this Policy (referred to as GM-S 2) does not explicitly refer to climate change. We agree that this is a huge gap and whilst the GMCA has introduced a short section (main document, page 84) which provides a few brief paragraphs under the heading *"Addressing Climate Change"*, this is woefully inadequate given the importance of supporting national, regional and local action plans when executing this Plan.

In addition, whilst there is copious information about the carbon emissions from new buildings and sustainable energy systems, etc, neither the Carbon and Energy Topic Paper (document 04.01.05) nor the associated evidence papers provide any data about the carbon emissions implications of construction on GM's peat mosses or the changes in land use as a consequence of the Allocations. We would expect this to include, as a minimum:

- for peat mosses, an estimate of the level of carbon being emitted today (as many are in poor condition), an estimate of the emissions that would occur if the peat is either extracted or piled and data about the potential level of future carbon capture and sequestration should the peat mosses be restored
- for all Allocation sites, similar data that demonstrates the current and future estimates of carbon emissions.

We would also expect to see data about the cost of **not** restoring our peat mosses, including the economic implications of delaying peatland restoration. Information is available about studies which have found considerable benefits in early restoration action. One online scholarly article (<https://www.sciencedirect.com/science/article/pii/S0959378021001023>) suggests that the *"timing of ecosystem restoration can influence its resilience to climate change"* and that the results of their study *"provide economic arguments for early investments in nature-based solutions"*. These academics particularly highlighted that *"inaction with respect to GHG mitigation in the short term implies a need for even larger removals of GHGs in the longer term"*.

Without making this data available, how is GM able to make assessments about the relative suitability of Allocation sites for construction/development? The assessment of specific Allocations cannot be complete without consideration of this data. We believe an assessment should have been completed that clearly sets out the impact each Allocation will have on GM's carbon emissions, incorporating those that accrue from the change of land use and including the loss of carbon sequestration capacity, together with an assessment of the expected additional carbon emissions that arise from the development itself.



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We also feel that the long-term impact of development cannot be captured unless the life cycle cost and carbon assessment tools are comprehensive and incorporate emissions resulting from (for example) development/construction on a peat moss. Such tools should also feature the benefits of nature-based solutions to enable a full suite of options to be assessed.

Finally, we would have expected to see some prominence of the potential for public buildings providing suitable locations for renewable energy schemes.

Given the lack of evidence made available to support this Policy, we believe it is not Justified.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- a complete moratorium that will prevent any construction on our peat mosses
- a clear action plan to restore our peat mosses in accordance with GM's 5-year Environment Plan and the Government's Peat Action Plan (this should be included as an outcome indicator within the KPIs)
- the provision of additional evidence, in the form of additional data that covers the carbon emissions related to the Allocations (this should be included as an outcome indicator within the KPIs). As set out above, we would expect this to include, as a minimum:
 - for peat mosses, an estimate of the level of carbon being emitted today (as many are in poor condition), an estimate of the emissions that would occur if the peat is either extracted or piled and data about the potential level of future carbon capture and sequestration should the peat mosses be restored
 - for all Allocation sites, similar data that demonstrates the current and future estimates of carbon emissions.
- the provision of additional evidence in the form of data about the cost of **not** restoring our peat mosses, including the economic implications of delaying peatland restoration.
- the provision of additional evidence that clearly sets out the impact each Allocation on GM's carbon emissions, incorporating those that accrue from the change of land use and including the loss of carbon sequestration capacity (this should be included as an outcome indicator within the KPIs)
- assurances within the Plan documentation that the life cycle cost and carbon assessment tools are comprehensive and will incorporate emissions resulting from (for example) development/construction on a peat moss, such tools should also feature the benefits of nature-based solutions to enable a full suite of options to be assessed
- an update to the KPIs set out on page 392. Whilst there is a KPI (page 392) related to reducing the carbon emissions from new development, there is only one outcome indicator "*% new development meeting the net zero carbon standard*". Other indicators should be included, such as x% GM's peat mosses restored within the first 5 years of the Plan period, y% restored in years 6-10, etc, z% reduction in carbon emissions from GM's peat mosses, etc. Without the data mentioned above, it will not be possible to provide credible information to demonstrate achievement of the requirements in this Policy.



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Q37 Policy JP-S 3 Heat and Energy Networks

The KPIs at page 392 of the main document are weak in relation to Heat and Energy Networks.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q38 Policy JP-S 4 Resilience

As pointed out in paragraph 5.28 (page 93) the “way in which Greater Manchester develops will have a significant impact on future levels of risk and vulnerability, and the ability of people and places to recover from acute shocks”. With this in mind, we believe this Policy is not Effective as it is not comprehensively adhered to in the Allocations set out within the Plan (we provide an example below). Given that lack of adherence, we would expect the alternatives that were considered, to enable GM to increase its resilience, to be clearly set out in the document. Without these, the Policy is not Justified as there should be definitive reasons why Allocations that do not adhere to this Policy have been proposed.

The Plan confirms (paragraph 5.24, main document, page 92) that “Greater Manchester aims to be one of the most resilient places in the world”. It recognises (paragraph 5.25, main document, page 92) that a “key part of achieving sustainable development is ensuring resilience”. It further recognises (same paragraph) that a “significant challenge within this is the ability to respond to future impacts from climate change”.

We agree with the statement at paragraph 5.27 (page 93) that GM needs to “plan to reduce chronic stresses as well as minimise the impact of acute shocks means that planning for resilience has to be all-embracing”. Yet, the protection and restoration of GM’s peatlands, which is essential to supporting GM to achieve its resilience goals, is not a requirement. Our peatlands are vital in the transition towards a low-carbon economy, in the prevention of catastrophic repercussions from extreme weather events and they are also highly significant to GM’s efforts to combat climate change.

We believe this Policy should be robustly enforced throughout the Plan and its Allocations. The Plan does not currently give appropriate weight to land which should be retained to support GM’s Resilience goals and, as mentioned above, no alternative options appear to have been considered to enable GM to increase its resilience.

The Policy suggests (page 93) that “Development will be managed so as to increase considerably the capacity of its citizens, communities, businesses and infrastructure to survive, adapt and grow in the face of physical, social, economic and environmental challenges, including climate change”. We do not believe this is evidenced in the Allocations. As an example, land in the New Carrington Allocation (JPA 33) currently provides protection to local communities from significant surface water flooding (there are photographs and videos showing the extent of the surface water flooding on the Friends of Carrington Moss website at this [link](#)).

The New Carrington Allocation does not adhere to the following key measures within this Policy (page 93):

- (1) Ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster;
- (6) Designing indoor and outdoor environments to provide a reduction and respite from more extreme temperatures and winds associated with climate change and greater urbanisation;
- (7) Increasing the size, spread, quality and interconnectedness of the green infrastructure network, enabling the city region, its citizens and wildlife to adapt to changing conditions;
- (8) Taking an integrated catchment-based approach to managing flood risk;
- (9) Maintaining a very high level of economic diversity across Greater Manchester;
- (12) Supporting healthier lifestyles and minimising potential negative impacts on health including air pollution; and
- (13) Carefully controlling the location of hazardous installations and new development that could be adversely affected by them.



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We set out, in our response to the Allocation itself (JPA 33), our detailed reasoning, the alternative strategies the Friends of Carrington Moss has proposed to Trafford, (including alternative sites for housing and employment land supply) and information about the current hazardous installations in the Allocation area, together with our concerns about increasing the population of both residents and employees in this area.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- a commitment to a requirement that the Policy is comprehensively adhered to throughout the Plan, including by the Allocations
- the provision of additional evidence to include details of the alternatives considered to enable GM to increase its resilience
- Achievement of resilience goals must be monitored through appropriate KPIs. Those set out on page 392, do not currently support monitoring of adherence to this Policy and must be extended.



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Q39 Policy JP-S 5 Flood Risk and the Water Environment

The document states (paragraph 5.34, page 95, main document) that the aim of the Sequential and Exception Tests is to “steer new development towards areas with the lowest risk of flooding first, before considering higher risk locations”. The paragraph (5.34) then continues “If it is not possible for development to be located in zones with a lower risk of flooding, new development must provide wider benefits to the community and can be made safe from flooding for its lifetime”.

Given that GM has excess land supply in relation to its needs and that the document acknowledges that climate change is “expected to significantly increase peak river flows and surface water run-off as a result of more intense rain events” (paragraph 5.33, page 94, main document), we do not believe it is Justified or sensible to accept that development may be built in areas that are subject to anything other than the lowest risk of flooding.

The words “wherever possible” should be removed from the Policy (page 96).

The KPIs should cover all aspects of this Policy.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- a commitment to confirmation that development will only take place in areas that are subject to the lowest risk of flooding
- the words “wherever possible” should be removed from the Policy (page 96).
- the KPIs should be updated to cover all aspects of this Policy.



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Q40 Policy JP-S 6 Clean Air

We strongly support this policy but believe it needs to be strengthened further, given that air pollution has such a major impact on the health and wellbeing of both human and wildlife populations (<https://www.theguardian.com/environment/2021/sep/01/air-pollution-is-slashing-years-off-the-lives-of-billions-report-finds>, <https://www.theguardian.com/environment/2021/aug/27/air-pollution-linked-to-more-severe-mental-illness-study>).

We are, therefore, identifying this policy as not being Positively Prepared. It is also not Justified because evidence relating to the current and predicted levels of air pollution are not available (including for the specific Allocations). It is not possible to determine whether schemes are likely to breach national air quality objectives (https://uk-air.defra.gov.uk/assets/documents/Air_Quality_Objectives_Update.pdf), following the completion of planned developments, without access to this information.

The Policy sets out (point 10, page 101) that GM is aiming to promote “*actions that help remove pollutants from the air, such as enhancing the green infrastructure network and using innovative building materials that capture air pollutants*”. We believe this should be significantly strengthened to include nature-based solutions and the proposal we mentioned in our response to Q36 (Policy JP-S 2 Carbon and Energy) for a complete moratorium, preventing any construction on GM’s peat mosses. The region’s peat mosses should be restored in accordance with GM’s 5-year Environment Plan and the Government’s Peat Action Plan and would provide a strong nature-based solution to significantly support this Policy.

The Policy states (page 100) that “*A comprehensive range of measures will be taken to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green infrastructure network and where air quality targets are not being met*” yet there are no actions which indicate that there will be an increased focus on the measurement of air pollution, particularly in those areas highlighted in the Policy itself.

We believe there is currently insufficient air quality monitoring being undertaken and that is apparent from the lack of data provided as evidence to this plan. Residents can only be given some responsibility for tackling air pollution if they know what it genuinely is in their neighbourhood and they understand how they are contributing to the problem, so we also think there needs to be a focus on information sharing with the public.

Availability of clear measures will also be important to achieving the WHO ‘BreatheLife City’ status by 2030 (paragraph 5.44, page 97), which means that the region will need to considerably extend its air quality monitoring regime.

We note document 02.01.01 (Integrated Assessment of the Greater Manchester Spatial Framework - GMSF Scoping Report (2021)) suggests (page 121) that GM’s Transport Strategy predicts that “*there will be an additional 600,000 trips on the GM transport network everyday by 2035*” and the document further comments (page 135) that “*transport is now the largest sector emitting greenhouse gas emissions*”, whilst confirming (page 134) “*road is the major means of freight movement in the UK and HGVs are significant contributors to carbon emissions*”.

Whilst point 7 of the Policy (page 101) mentions the facilitation of more sustainable distribution of goods within the urban area, there is no action to propose modal change for freight traffic, from the road to other, more sustainable, forms of transport (rail or shipping) to reduce the elevated levels of air pollution caused by HGVs.

Finally, the Transport Locality Assessments do not provide detailed traffic level information that makes the impact of the Allocations on air pollution, either individually or in total, clearly understood. Data should be provided that confirms the current traffic (both cars and HGVs), traffic that will accrue from planning applications that have already been approved in the Allocation areas and traffic that will be generated by the Allocations themselves. Without this detailed information, it is impossible to fully assess the impact of the planned Allocations on air pollution in the GM region.



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Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- a complete moratorium that will prevent any construction on our peat mosses
- a clear action plan to restore our peat mosses in accordance with GM's 5-year Environment Plan and the Government's Peat Action Plan (this should be included as an outcome indicator within the KPIs)
- a commitment to regular air quality monitoring (covering, as a minimum, data showing the measures for NO₂ and CO₂) will be undertaken at every school in GM (this should be included as an outcome indicator within the KPIs)
- a commitment to initiatives, and associated funding, to encourage local communities to support air quality monitoring in their local areas (this should be included as an outcome indicator within the KPIs)
- a commitment to collaboration with community groups and Parish Councils to agree information sharing initiatives that communicate the impact of air pollution and how individuals can help to reduce it (this should be included as an outcome indicator within the KPIs)
- a commitment to a requirement for a significant modal shift of HGV traffic from the roads in GM to rail and shipping freight routes (this should be included as an outcome indicator within the KPIs)
- the provision of additional evidence, in the form of more detailed traffic level information, for both cars and HGVs, that clarifies the number of vehicle journeys on local roads within the Allocation areas (including current traffic, traffic that will accrue from planning applications that have already been approved and traffic that will be generated by the Allocations themselves).



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Places for Everyone Response

Q41 Policy JP-S 7 Resource Efficiency

The KPIs at page 392 of the main document are weak in relation to Resource Efficiency.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q42 Policy JP-J 1 Supporting long-term economic growth

Whilst we recognise the importance of economic growth to this strategy, what should be central (paragraph 6.1, page 106) is addressing the climate emergency and ensuring the health and wellbeing of GM's residents. Employment, and, therefore, economic growth, should be part of that aspiration, not the other way round. It is an important difference, especially as prosperity can be measured in ways other than just wealth and, as mentioned at paragraph 6.11 (page 108), "*Growth today must not come at the expense of the ability to deliver sustained prosperity and quality of life*". This alternative approach would also help make the Plan sustainable.

As mentioned in our earlier responses, the Plan does not give appropriate weight to the rural areas of our Region. It is, therefore, not Positively Prepared. The main document confirms (paragraph 1.51 page 17) that almost half of the land in the 9 Boroughs (46.7%) is designated green belt, and can, therefore, be considered to be an indicator of the size of GM's rural land. Yet, the Policy does not make any reference to any aspect of the rural economy and, therefore, does not reflect the region's objectively assessed needs. Disturbingly, the Policy itself does not consider our rural economy to be one of the "*high value clusters in prime sectors*" (page 109)

The Employment Topic Paper (paragraph 3.10, page 8) acknowledges the NPPF paragraphs relating to the rural economy, yet there is no evidence or strategic aims that reflect those requirements, the Policy is, therefore, not Consistent with National Policy.

The Greater Manchester Local Industrial Strategy (paragraph 6.3, page 106) mentions in its opening paragraph that Greater Manchester is known globally for its rural communities, among other attributes. Whilst we acknowledge that an Industrial Strategy probably will not take into consideration the aspirations of the rural areas of GM, to omit entirely from this Plan a strategy to shape the prosperity of the rural areas of GM, further emphasises the (incorrect) urban identity that flows through this Plan. A focus on a rural strategy could also help address some of the "*significant economic disparities*" set out at paragraph 6.8 (page 107) and support the Plan in achieving sustainable development.

The document does not acknowledge the extensive skill base of our rural workforce (paragraph 6.5, page 107) and does not consider the reasonable alternatives to land use for the rural economy. The Policy is, therefore, not Justified and the Plan does not currently promote "*prosperity for all residents and places in a sustainable way*" as suggested in paragraph 6.15 (page 109).

Sustainable growth, that benefits everyone and all of our places (paragraph 6.11, page 108) cannot happen without some focus on the whole of GM, not just the urban core.

It is noted that many points raised in the Integrated Appraisal (Employment Topic Paper, page 30) have been updated in other Policies within the Plan, which is appropriate as long as those Policies have been updated and are followed by all the Allocations, Local Plans and future development applications.

Point C in the Policy itself (page 110) is extremely important. It emphasises that GM must make "*the most of major assets of the sub-region*" such as the existing transport infrastructure (Manchester Airport, Manchester Ship Canal, public transport networks and the motorway network) and the major proposed transport improvements (HS2 and Northern Powerhouse Rail). The Plan must ensure and measure, through its KPIs, that businesses take advantage of these existing assets. This will ensure we protect our green spaces because there will be no need to construct new major roads or office space (such as that proposed in the Manchester Airport Allocation (JP-Strat 10), which is clearly not Justified given that the Employment Topic Paper (paragraph 7.9, page 42) highlights the abundance of Office Supply). We totally agree that we should make the most of our public transport networks, and the investment that has been made in them. With this in mind, new office space does not need to be constructed on the green belt – businesses can take advantage of existing land supply and utilise our transport assets to reach those offices.



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It should be noted that the economic opportunities that result from the transition to carbon neutral (Policy point D, page 110) can arise from natural solutions providing employment for those who are interested in enhancing our natural assets.

The Employment Topic Paper says, paragraph 8.15 (page 51) that there *“is evidence that past industrial and warehousing completions have been constrained by a lack of suitable sites within the plan area, resulting in the city-region being unable to compete for some major occupiers.”* We can find no evidence demonstrating this assertion and it is not borne out by the number of vacant warehousing sites across GM. It is, therefore, not Justified and is premature to determine that green belt should be released to provide sites for industrial and warehousing employment, often in unsustainable locations, such as New Carrington. Consideration should instead be given to pointing developers to existing sites (even where they may be dilapidated or in need of some refurbishment). Furthermore, a detailed review of available land supply should be carried out (in collaboration with local residents and their representatives) prior to the release of any green belt in GM.

The Employment Topic Paper states, paragraph 8.50 (page 58) that *“New Carrington provides the only opportunity in the plan area to deliver a new settlement of significant size”*. We can find no evidence in the Plan to justify this assertion. The paragraph goes on to assert that *“The inclusion of a large amount of employment development and local facilities, as well as a diverse range of housing, will enable New Carrington to function as a sustainable neighbourhood within Greater Manchester”*, yet there are no trams nor trains planned for New Carrington (despite the presence of a former railway line) and the response to our Freedom of Information Act request reveals that there are no commitments to increased bus services. It seems New Carrington is destined to remain an isolated community, which will require both residents and employees to use their cars. For this and many other reasons set out in our response to Q31 and Q108, it cannot be considered to be a sustainable development. The statements in this paragraph are not Justified and should be removed.

Paragraph 6.15 (main document, page 109) sets out the measures to promote sustainable prosperity for all residents and places. Yet these measures do not appear to be adhered to in the Allocations. The planned developments at New Carrington (JPA 33), for example, do not meet the following measures set out at paragraph 6.15 (page 109) – we explain our concerns further in our response to Q31 and Q108 (New Carrington Policy and Allocation respectively):

- *“Delivering sustainable places that can meet the needs of all sections of communities, both now and in the future*
- *Enhancing the supply of employment opportunities at a variety of skill levels throughout our boroughs to achieve more inclusive growth*
- *Enabling all residents to lead healthier lives in safer places with good access to facilities that support health and wellbeing including good quality open space and green infrastructure*
- *Seeking a net enhancement to biodiversity across our boroughs.”*

We discuss our concern about the elevation of employment land requirements in our responses to Q44 and Q45 (Office Development and Industrial and Warehousing Development respectively) but, in summary, despite the uncertainties following Brexit and the pandemic and the recent changes to the permitted development scheme, no assessment appears to have been included to take any of these factors into account. Given the impact on GM communities and the rural economy of the planned green belt release, we believe an estimation should have been made, despite the conclusions of document 05.01.03 (COVID-19 and PfE Growth Options) that there was *“not sufficient certainty/evidence currently available to inform a robust “reasonable alternative” growth option for purposes of the PfE 2021 Plan”*, particularly as there is an intention to review the Plan outside of the statutory review timetable paragraph 6.13 (main document, page 108).

Without the evidence relating to these considerations, it is not Justified to add a significant margin (Employment Topic Paper, paragraph 4.6, page 16) to Employment Land Need and is premature



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to require green belt release. The detailed review of land supply, mentioned earlier in this response, should include an assessment of these factors. This should be easy to agree given that paragraph 6.13 (main document, page 108) confirms that it is appropriate *“to use the process of plan review to monitor the situation and if necessary to undertake a formal review outside of statutory review timetable”*.

Finally, the Policy does not make it explicit that it will comply with Objective 3 (main document, page 40) in terms of prioritising the use of brownfield land and the Policy must be updated to reflect this.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- the Plan should be reshaped to put the climate emergency and the health and wellbeing of GM's residents at the heart of all its Policies to ensure sustainable development can be achieved
- the provision of additional evidence in the form of a Rural Economic Strategy
- the provision of additional evidence in the form of Rural Land Need, existing and projected, together with the associated skill-base, challenges, etc
- removal of the proposed office space at Manchester Airport (JP-Strat 10) – Medipark Allocation
- update the wording in Policy point D (page 110) to reference the economic opportunities arising from natural solutions
- a detailed review of land supply should be carried out (in collaboration with local residents and their representatives) prior to the release of any green belt land for employment sites - in advance of the results of that review being available, developers should be pointed to existing sites
- the detailed review mentioned above should also consider an assessment of land supply impacts arising from Brexit, the pandemic and the recent changes to the permitted development scheme
- remove the incorrect statements at paragraph 8.50 of the Employment Topic Paper
- confirmation that this Policy will require brownfield land use to be prioritised
- all the Allocations should be updated to ensure they meet the measures set out at paragraph 6.15 (page 109)
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q43 Policy JP-J 2 Employment Sites and Premises

Whilst we recognise the importance of ensuring there is an “*excellent supply of employment sites and premises across the Plan area*” (paragraph 6.16, page 112), to achieve sustainable development, GM’s climate emergency goals and the transition to carbon neutral, economic growth must be put on a par with the health and wellbeing of GM’s residents, the importance of improving biodiversity and the essential role of our green belt and green spaces. This means that GM should have a greater focus on existing employment sites, especially those that are dilapidated and under-used, improving land utilisation (multistorey warehousing) and the potential for repurposing some of the unused office land (paragraphs 7.5 and 7.6, Employment Topic Paper, page 40). These alternatives are not set out in the Plan, which is, therefore, not Justified. With this in mind, it is premature to release green belt or protected open land for employment land supply purposes.

The Policy does not consider the Employment Sites and Premises needed to support the Rural Economy, meaning it is not Positively Prepared, Justified or Consistent with National Policy.

Finally, the Policy does not make it explicit that it will comply with Objective 3 (main document, page 40), in terms of prioritising the use of brownfield land and the Policy must be updated to reflect this.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- a comprehensive review of land supply should be carried out (in collaboration with local residents and their representatives) prior to the release of any green belt or protected open land for employment sites - in advance of the results of that review being available, developers should be pointed to existing sites
- the detailed review mentioned above should also consider an assessment of land supply impacts arising from Brexit, the pandemic and the recent changes to the permitted development scheme
- the Policy should be updated to include reference to the Employment Sites and Premises needed to support the Rural Economy, a new section should also be added to this Plan to support this requirement (after Industrial and Warehousing Development)
- confirmation that this Policy will require brownfield land use to be prioritised
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q44 Policy JP-J 3 Office Development

We recognise the importance of retaining employment areas to support economic growth, but it is clear that there is already an over-abundance of Land Supply for Office space, as demonstrated in the Employment Topic Paper (paragraphs 7.5 and 7.6, page 40) and, whilst we accept that the conclusions of document 05.01.03 (COVID-19 and PfE Growth Options) stated that there was “*not sufficient certainty/evidence currently available to inform a robust “reasonable alternative” growth option for purposes of the PfE 2021 Plan*”, given the expected changes to working practices, following the acceleration of homeworking caused by the pandemic, in particular, we are astounded that Office Employment Land Need has been uplifted by a margin of 25% (05.01.02 Employment Land Needs in Greater Manchester, paragraph 1.12, page 5).

This refusal to accept that what is currently planned to be Office Employment Land may need to be more flexibly allocated in future is a clear indication plan continuation bias. Table 6.1 (main document, page 117) confirms, as mentioned above, that Office Land Supply 2020-2037 far outweighs need across GM. Existing Office Land Supply should, therefore, be considered for alternative purposes (whether conversion to housing or, in some cases, possibly industrial and warehousing options) to reduce the pressure on GM’s green belt, which will support a sustainable Plan and GM’s ability to address the climate emergency.

Point C in Policy JP-J 1 (Supporting Long Term Economic Growth, page 110) is extremely important. It emphasises that GM must make “*the most of major assets of the sub-region*” such as the existing transport infrastructure and the major proposed transport improvements. The Plan must ensure and measure, through its KPIs, that businesses take advantage of these existing transport assets to reach the existing Office Land Supply. To propose the release of green belt, when there is a clear over-supply and existing transport assets is not Justified, nor Positively Prepared, nor Consistent with National Policy. The proposal to release green belt within the Manchester Airport Enterprise Zone key location (paragraph 6.24, page 114) should be removed from the Plan.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- a comprehensive review of Employment Land Supply should be undertaken (in collaboration with local residents and their representatives) and should consider whether any of the over-supply of office space can be utilised for other purposes
- any proposals to release green belt for office space within the Plan should be removed
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q45 Policy JP-J 4 Industrial and Warehousing Development

To demonstrate sustainability, the Plan needs to balance the needs of the economy, the culture and the environment. We believe this Plan is too focused on the economy and insufficiently directed towards the balancing factors.

The document states (paragraph 6.33, page 120) that the *“existing supply of potential industrial and warehousing sites identified in the districts’ strategic employment land availability assessments are insufficient to meet the overall identified need”*. This is incorrect because:

- the calculation of need has been based on past completions (which may not represent future growth requirements)
- a significant margin has been added to the numbers (see below)
- there is no evidence anywhere in this Plan about the needs of the rural economy (which should have been considered alongside the requirement to build industrial and warehousing on green belt) – only 47% of the industrial and warehousing sites are proposed for build in urban areas (paragraph 1.42, page 16).

We do not, therefore, agree with the premise (same paragraph) that the only realistic option is to remove some land from the green belt.

The approach set out at paragraph 6.31 (page 119) means green belt will be released on day one, following plan approval. Providing *“choice and flexibility”* will see that green belt built on for industrial and warehousing. Existing businesses are expected to relocate and expand on the green belt and those *“poorer quality current employment sites”* will be added to the brownfield register – this does not seem consistent with Objective 3 (main document, page 40), in terms of prioritising the use of brownfield land and the Policy must be updated to reflect this.

We believe this Policy is not Positively Prepared, Justified or Consistent with National Policies because, as mentioned above, the requirements of the rural economy have been omitted from the Plan. Products and services from that sector will be significantly reduced as the needs of the rural economy have not been taken into consideration in the decision to propose the release of green belt land to accommodate over 2,000,000 m² industrial and warehousing space. The Policy suggests that, despite this, it will *“support environmental objectives by reducing the number of HGV journeys from the ports and distribution parks across England”* (main document, paragraph 6.28, page 117). Given the number of Allocations that are not in sustainable locations, we disagree. The release green belt for this purpose will also impact GM’s ability to address the climate emergency, many of these sites currently protect surrounding areas from flood risk and are rich in biodiversity.

Whilst we recognise that employment land supply does not typically include an allowance for Windfall (paragraph 3.15, page 74, Employment Topic Paper), GMCA and the nine Authorities are proposing the release of green belt at a time of great uncertainty, in terms of employment land need. Whilst we accept that the calculation of need has been based on past completions, it is clear that land may become available due to business uncertainties caused by Brexit and the pandemic. There is also a possibility that the recent changes to the permitted development scheme may result in land becoming available. The Plan should have included evidence relating to these factors and, without such evidence, it is not Justified and it is premature to propose the release of green belt.

In terms of the numbers, document 05.01.02 (Employment Land Needs in Greater Manchester) states (paragraph 1.12, page 5) that a margin of 31.5% has been added to Employment Land Need, representing the upper end of margins to *“cover rigidities in supply, flexibility for choice and the inherent uncertainties in forecasting future needs”*. We do not believe it is Justified or appropriate to add such a margin given the uncertainties caused by Brexit and the pandemic and the need to address the climate emergency in Greater Manchester.



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Furthermore, despite this high margin being added, the Industry and warehousing land supply table (Table 6.2, page 122) proposes a land supply of 3,960,389 (an additional 19% over and above a number which is already inflated by 31.5%), taking the overall margin added to the calculated need to over 50%. According to document 05.01.02 (Employment Land Needs in Greater Manchester), a typical figure for such a margin is 10% to 20% (paragraph 1.19, page 9). We believe this inflated margin causes the Policy to be not Positively Prepared and not Justified.

A review of **ALL** available Employment Land Supply should be carried out (in collaboration with local residents and their representatives). This review should also consider an appropriate margin, given the uncertainties mentioned above and the potential for “windfall” sites to become available.

The review should consider whether any of the over-supply of office space mentioned in our response to Q44 (Office Development) can be utilised for other purposes, including industrial and warehousing, particularly where the land is already in a sustainable location. There is also no evidence in the current documentation that opportunities to reduce land-take have been considered, including, for example, techniques such as multistorey warehousing.

Without including any such considerations, using a typical margin (of between 10% and 20%), the amount of green belt land that would need to be sacrificed for Industrial and Warehousing would be significantly reduced (by over 50%). It is, therefore, clearly premature to propose the release of green belt until all the options mentioned above have been fully appraised.

It is unreasonable for this Policy to prioritise “*a high level of choice and flexibility*” (Employment Topic Paper, paragraph 8.16, page 51) at the cost of the health and wellbeing of GM residents and wildlife populations. Brownfield sites, particularly those in sustainable locations, should take precedence. All industrial and warehousing sites should be focused near GM’s transport assets, as set out in Point C in Policy JP-J 1 (Supporting Long Term Economic Growth, page 110). This Policy emphasises that GM must make “*the most of major assets of the sub-region*” such as the existing transport infrastructure and the major proposed transport improvements.

The Employment Topic Paper says, paragraph 8.15 (page 51) that there “*is evidence that past industrial and warehousing completions have been constrained by a lack of suitable sites within the plan area, resulting in the city-region being unable to compete for some major occupiers.*” This is reinforced in the main paper (paragraph 6.30, page 118). Yet, we can find no evidence demonstrating this assertion and it is not borne out by the number of vacant warehousing sites across GM. It is, therefore, not Justified and is premature to determine that green belt should be released to provide sites for industrial and warehousing employment, often in unsustainable locations. Consideration should instead be given to pointing developers to existing sites. Furthermore, as mentioned above, a detailed review of available land supply should be carried out (in collaboration with local residents and their representatives) prior to the release of any green belt in GM.

Some of the other assertions in the Plan, such as, for example, the statement that industrial and warehousing provision “*will help to reduce inequalities*” (main document, paragraph 6.26, page 117) and that this sector delivers high levels of “*productivity and income*” (paragraph 6.27, page 117), and (same paragraph) “*Enabling the success of this sector will be important for the wider prosperity of the North of England*” do not appear to have any supporting background evidence.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- the provision of evidence to demonstrate that the release of green belt land for industrial and warehousing sites will not damage the rural economy
- the provision of evidence to demonstrate that the release of green belt land will not impact GM’s need to address the climate emergency



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- confirmation that this Policy will explicitly require brownfield land use to be prioritised
- an assessment should be made to identify the number/size of potential sites arising from business uncertainties caused by Brexit, the pandemic and, also, as a consequence of the recent changes to the permitted development scheme
- a comprehensive review of Employment Land Supply should be undertaken (in collaboration with local residents and their representatives), including reference to the assessment mentioned above and consideration should be given to the margin that should be applied
- the review should consider whether any of the over-supply of office space can be utilised for other purposes, including industrial and warehousing, particularly where the land is already in a sustainable location (opportunities should also be taken to consider techniques such as multistorey warehousing to reduce land-take)
- any proposals to release green belt for industrial and warehousing space within the Plan should be removed
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q46 Policy JP-H 1 Scale, Distribution and Phasing of New Housing Development

We believe this Policy is not Positively Prepared, neither is it Justified nor Consistent with National Policy. The document states (page 133) that “A minimum of 164,880 net additional dwellings will be delivered over the period 2021-37, or an annual average of around 10,305”. This Policy wording is misleading as the strategic intent, which is set out in the preceding paragraphs, is to plan for sufficient land supply totalling 190,752 homes (including the release of green belt to provide 20,367 homes).

We contend that this policy for has not been Positively Prepared for the following reasons:

- The housing need calculated using the Government’s formula results in a requirement for 164,880 homes (LHN). Given that the population of the plan area is projected to increase by c158,200 between 2021 and 2037 (paragraph 7.14 p132), meeting the LHN alone would provide a newly built house for every member of that new population (with some left over)
- The average household size for GM is 2.38 persons (based on the 2011 Census). This suggests that a population increase of 158,200 would require circa 66,500 homes. Even if there is a growing necessity for one bedroomed homes, a backlog of housing need, or challenges with the delivery of some sites, the contingency between the LHN and actual housing need provides a sufficient buffer to meet those requirements. We believe this contingency means there will be sufficient choice and flexibility of sites to meet the needs of developers and Councils (as set out in paragraph 7.12, page 130)
- Table 7.1 (main document page 131) confirms that there is an existing land supply of over 170,000, sufficient to meet that LHN figure and also sufficient to meet the housing needs of over 400,000 people, against a projected population increase of 158,200 people.

In addition, we note that the Government confirmed, in their blog of 25th May 2021 (<https://mhclgmedia.blog.gov.uk/2021/05/25/response-to-the-times-front-page-on-housing-building-target-analysis-by-the-campaign-to-protect-rural-england/>) that protecting the green belt is a priority and that, where available land supply is constrained by factors such as the green belt, “*an area therefore has to plan for fewer new homes*”. The blog set out that the numbers calculated by the national formula are a starting point, not a legally binding requirement. It also verified that Local Authorities must consider their local circumstances in finalising their housing need, taking into account factors such as land availability and environmental constraints. Successive Government Ministers have confirmed this both in writing and during Parliamentary debates throughout the GMSF process.

We recognise the uncertainties caused by Brexit and the pandemic and we appreciate that timing has made it difficult to understand clearly (through evidence) the impact of these factors. The document confirms (paragraph 7.6, page 128) that “*it is considered that a cautious approach to predicting delivery rates should be followed in the early years of the plan*”. Despite this, GMCA did not consider a cautious approach to releasing green belt. We believe this will lead to the premature release green belt, at a time of huge uncertainty, and this lack of caution will see green belt sites being developed, brownfield sites being left untouched, and the amount of previously developed land increasing significantly due to those Brexit and pandemic factors. This will lead to GM not being able to meet its climate emergency and carbon neutral obligations, set out elsewhere in the document.

The Housing Topic Paper, paragraph 6.18, page 59, states that following “*the review of the evidence it is considered that we should identify sufficient housing land above the LHN to ensure an appropriate level of flexibility and choice has been taken into consideration*”, and GMCA has confirmed (paragraph 7.16, page 132), that it has added “*a significant buffer on the housing land supply*”. It is also clear (Housing Topic Paper, paragraph 6.20, page 59) that an update will be required to the SHLAA. We believe that further evidence should have been prepared and considered as set out below.



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Should there be a view that a large buffer is needed, there are alternatives to proposing the release of green belt land. One of these is to include large and medium sized Windfall Sites. The Housing Topic Paper confirms that these sites have not been taken into consideration in the figures (despite being acceptable if based on *“historic windfall delivery rates and expected future trends”* (NPPF paragraph 70). GMCA asserts that this is due to a lack of consistent and comparable data on past trends but concedes at paragraph 8.2.4 (p110) that *“there is clear evidence to demonstrate that such sites have come forward in the past and no reason to believe that this will not continue to be the case”*. We assert that evidence showing historical Windfall rates should have been provided as part of this Plan and should have been considered within the Housing Land Supply calculations given the changes to cultural and business practices (such as more home working and the acceleration of online shopping) and the financial challenges that businesses are facing post Brexit and pandemic.

Furthermore, there is no reference (in either the main document or the Housing Topic Paper) to the potential for the expanded permitted development rules to create housing supply (despite the recognition at paragraph 6.75 of the Housing Topic Paper that there are national funding streams available to support the revitalisation of town centres, for example and the over-abundance of Land Supply for Office space, as demonstrated in the Employment Topic Paper -paragraphs 7.5 and 7.6, page 40). Whilst we appreciate PDR estimates could be difficult to calculate, given the lack of trend information, an updated call for sites could have requested information about future plans for empty offices to support the creation of estimated figures. In addition, the House of Commons Library Research Briefing: Planning in England: permitted development and change of use, dated 4th June 2021, (<https://commonslibrary.parliament.uk/research-briefings/sn00485/>) states *“A total of 72,980 new dwellings were added to the housing stock through PDRs over the five years between 2015-16 and 2019-20. Of these, 64,798 (89%) were created through office to residential conversions – the largest category by a substantial margin”*. This suggests that evidence in the form of estimated data should be available.

We also have major concerns about the Call for Sites assessment that has been carried out in relation to this Plan, as set out in the Site Selection Background Paper (03.04.01). GMCA and Districts should have been doing all they possibly could to ensure that Objective 2, to prioritise the use of brownfield land, is met. The approach taken does not achieve that goal.

The Site Selection Background Paper confirms that (paragraph 3.7, page 8) the process focused on a relatively small number of larger sites, rather than a greater number of smaller sites. This immediately calls into question the approach, as many of those larger sites are on green belt, are not sustainable and, if retained, would help GM to address the climate emergency. As mentioned elsewhere in our responses, many of these sites also currently support the rural economy, which will be significantly damaged by the current Plan.

In addition, there is a clear over-reliance on locations that were proposed during the original Call for Sites exercise, which the document confirms (paragraph 3.4, page 7) commenced in November 2015 and was closed for further submissions in March 2017. This has resulted in the observation of plan continuation bias. In addition, given the original Call for Sites was 6 years ago, we would have expected a new Call for Sites to have been made to ensure the Plan is based on the most up to date information.

The assessment process commences with a review of Protected Open Land and Safeguarded Land (paragraph 6.2, page 12). We would have expected Stage 1 to be a review of urban sites that have been proposed. These would be sites that are not on the brownfield register or the current SHLAA. Had residents been more involved in this process (the consultation and engagement has been extremely poor), a much more comprehensive list of sites could have been assessed. The Friends of Carrington Moss, for example, created an alternative land supply list that included a number of sites that had not been considered by Trafford (see our response to the New Carrington Allocation – JPA33). Across the Region, Brownfield Registers and SHLAAs have



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not been updated in collaboration with residents and it is also clear (Housing Topic Paper, paragraph 6.20, page 59) that an update will be required to the SHLAA.

Finally, we are also concerned that the broad areas of search set out at paragraph 6.4 (page 13) severely limited the locations considered and eliminated appropriate sites at an early stage in the process.

There has clearly been an element of subjectivity within the assessment, and this has been confirmed in paragraph 6.40 (page 28). It is also evident in the graphics provided in Appendix 1 Site Selection Criteria Maps (03.04.02), which demonstrates (on page 8), for example, that the New Carrington Allocation (JPA 33) does not meet Criterion 2 (whilst Port Salford and Manchester Airport are shown on the map, there is no indication of the definition of 'proximity' in terms of distance. In addition, New Carrington is separated from Port Salford by the Manchester Ship Canal and from Manchester Airport by distance). We provide our reasons why we do not believe the New Carrington Allocation meets this and other criteria in our response to Q108.

The document confirms (paragraph 6.1, page 12) that a *"key outcome from the Site Selection process is to demonstrate a clear, consistent and transparent approach to the selection of sites, in the DraftPfE 2021"*. Yet it is not clear why there was no further Call for Sites (the original request having been held some 6 years earlier). It is not clear why brownfield sites have not been prioritised and it is also not clear why larger, unsustainable sites were preferred above smaller, more sustainable sites that would have less impact on local communities.

We believe, therefore, that this policy is not Justified for the following reasons:

- whilst the Plan has demonstrated caution in relation to the prediction of delivery rates, it has not demonstrated caution in relation to the release of green belt land, which will significantly impact GM's ability to meet its climate emergency and carbon neutral obligations
- evidence has not been provided to demonstrate the potential large and medium Windfall sites that may become available
- evidence has not been provided to demonstrate the potential housing supply that could result from the use of PDRs
- the Site Selection process was not comprehensive, was not revisited for updating purposes and has not considered all the potential options.

Paragraph 7.12 (main document, page 130) states that a number of spatial options have been considered and it has been concluded that some land must be released from green belt to be allocated within the Plan for residential development. It should be noted that, whilst the net loss of green belt will be 1,754 hectares, the gross loss is 2,430 ha of green belt, the equivalent of 3,400 football pitches (675 ha of new green belt is being proposed as part of this Plan).

GM's Growth and Spatial Options Paper (02.01.10) sets out the approach taken to consider a variety of options since 2015. The document suggests (paragraph 6.1 page 11) that GMCA reviewed the options for GMSF 2020. We believe they should have gone further and consulted residents again about the reasonable alternative growth strategies for GM because many young people, who will be most impacted by this Plan, were not involved in 2015. People who have moved into the area since the commencement of the Plan have also not had an opportunity to be involved. All those people who were not informed, due to the very poor consultation and engagement, should have had another opportunity to comment on these extremely important growth and spatial options. Finally, we understand that **only 180 responses** were received to the 2015 consultation, of which only 33 appear to have been from residents, out of a [GM population](#) of over 2.79m people. This is a pitiful and unrepresentative response considering it relates to the whole of GM and demonstrates the lack of appropriate communications channels used to inform residents.

It is also of great significance that each District, the GMCA and all the GM Health Authorities have declared a climate emergency since the original options were consulted upon. We are extremely



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concerned that the implications of climate change have not been considered in the decision to continue with an option that requires the unnecessary release of green belt. In concluding that there were no material changes in relation to the Growth and Spatial Options (Site Selection Background Paper 03.04.01, paragraph 4.2, page 9) since GMSF 2020, we do not believe the statutory duties relating to climate change have been comprehensively considered within the principles underpinning this Plan. It is also clear, from the responses to previous consultations, that residents do not support the release of green belt and more weight should have been given to those views rather than succumbing to plan continuation bias.

In addition, the impacts of Brexit and the Pandemic have been given little consideration within the current document and we can see no reference to lessons that can be learned from our counterparts in Europe that are facing similar challenges, which they have resolved through compact (higher density), well connected, developments.

We, therefore, also believe this Policy is not consistent with National Policy for the following reasons:

- the Growth and Spatial Options have not comprehensively considered the statutory duties relating to climate change (Section 19(1A) of the Planning and Compulsory Purchase Act 2004 and the Climate Change Act 2008) as there have been no changes incorporated since each District, the GMCA and each Health Authority in GM declared a climate emergency
- the level of housing supply being proposed does not result from objectively assessed housing need (NPPF paragraph 11 (b), page 6)
- paragraph 140 of the NPPF states *“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”*, for the reasons set out above, we do not believe GM has demonstrated that exceptional circumstances exist to justify the release of green belt land.
- furthermore, paragraph 141 of the NPPF states *“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development”*, as highlighted in the paragraphs above, we do not believe the GMCA has examined fully all other reasonable options for meeting its identified need for development.
- finally, many of the green belt sites that have been selected are not currently sustainable, nor will they be sustainable following development, please see our response relating to the New Carrington Allocation (JPA 33) as evidence of this point.

We believe all Allocations that require the release of green belt should be removed from the Plan until a comprehensive review of Greater Manchester Land Supply has been undertaken, in collaboration with community groups, Parish Councils and other interested bodies. These Allocations can then be considered within the Local Plans for each District. This would be consistent with the process set out at paragraph 7.7 (page 128) *“it is considered appropriate to proceed on the basis that we should seek to meet our LHN up to 2037 but to use the process of local plan review to monitor the situation and if necessary to undertake a formal review outside of the statutory timetable”*.

Integrated Assessment page 52 Housing Topic Paper

The Housing Topic Paper (paragraph 5.6, page 52) mentions that it was not considered necessary to amend this Policy in relation to the Integrated Assessment recommendation for climate change as the issues will be addressed through the thematic policies, particularly those in the Sustainable and Resilient Greater Manchester chapter. We agree, as long as those thematic policies have been updated and all the Allocations and future development requirement comply with those policies.



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Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- the provision of evidence showing historical Windfall rates for each District
- an updated call for sites, including a specific request for information about plans for the excess office space in GM
- the provision of evidence showing estimated PDR rates for each District
- all Allocations within this Plan that propose the release of green belt should be removed – all such sites can be reconsidered within the Local Plan for each District
- an updated Growth and Spatial Options Paper should be produced and a further consultation (including high levels of engagement in each District) should take place on those Growth and Spatial Options, to ensure the option selected is supported by the majority of the current GM population, including the young people who will have to live with the consequences of the decision
- a comprehensive review of Greater Manchester Land Supply should be undertaken, in collaboration with community groups, Parish Councils and other interested bodies
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q47 Policy JP-H 2 Affordability of new housing

We agree with the assertion set out in paragraph 7.3 (page 127) of Policy JP-H 1 which states that the GMCA considers a decent home to be a fundamental human right, however, we believe this Policy is not Positively Prepared nor is it Effective.

The Policy aims to deliver the Plan's share of at least 50,000 additional affordable homes across Greater Manchester up to 2037, with at least 60% (30,000) being for social rent or affordable rent (page 136).

We do not think the Policy is Positively Prepared because the document states (paragraph 7.23, page 135) that there are "around 72,000 households on the local authority registers, with over 26,000 of these identified as being in reasonable preference for housing". In addition, the requirement set out in the Strategic Market Housing Assessment suggests (page 209) that GM needs to complete around 5,850 affordable homes annually, this would equate to a total of over 90,000 affordable homes across the Plan period.

Whilst the Policy is admirable, it should at least aim to achieve a significant % of those challenging waiting list numbers, not just those in 'reasonable preference'. The document suggests (paragraph 7.23, page 135) that "It is estimated that around 38% of newly forming households are unable to afford to buy or rent a home at lower quartile prices". We are concerned that, post the pandemic, there will be even higher numbers on housing waiting lists and this is reflected in the Local Government Association warning, in June 2020, that there would be a need for the UK to build 100,000 social homes per year as part of Covid 19 recovery (<https://www.local.gov.uk/about/news/100000-social-homes-year-needed-part-covid-19-recovery-councils-warn>).

We cannot find evidence that the Policy will be Effective. Neither the Plan, or in its associated supporting documents, provide confirmation about how this challenge will be addressed, for example:

- a number of Allocations make no reference to any affordable housing, stating that the homes will be high quality
- other Allocations provide no value or suggest the % affordable will be in accordance with local policy
- of those Allocations that do indicate a %, the New Carrington Allocation (for example) will only provide 15% affordable homes which equates to less than 650 homes across the Plan period and this is the largest housing Allocation in the Plan.

Historical trends suggest that clear strategic and tactical actions are required to deliver this policy. ONS data for the period between 2015 and 2020 confirms that there have been less than 8,000 completed affordable homes of all types for the whole of GM during that period. That is significantly less than 2,000 affordable homes being completed each year. The Housing Topic Paper notes (paragraph 6.64, page 72) that Greater Manchester Housing Providers have made a collective commitment to "double their delivery of new homes, to 16,000 over five years from 2018, to support the housing delivery targets in the city region" and whilst this is laudable and welcome, when decisions continue to be made to deliver significant schemes with no affordable housing (such as the recent Manchester City Centre scheme reported by the Manchester Evening News - Over 1,200 new flats in Manchester city centre approved – but none will be affordable, 4th August 2021, <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/over-1200-new-flats-manchester-21217838>), we have little confidence that these numbers will be achieved.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:



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- the inclusion of an increased target for the number of Affordable homes to be provided during the Plan period, particularly the number of homes for social or affordable rent
- the provision of evidence showing how Affordable housing of each type, including housing for social and affordable rent, will be provided
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q48 Policy JP-H 3 Type, size and design of new housing

We disagree with the statement set out at paragraph 7.28 (page 136) which suggests that green belt will need to be released to support and enable the delivery of this Policy and believe this is unsound as it is not Consistent with National Policy (the type, size and design of new housing is not an exceptional circumstance).

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- removing any reference to the release of green belt from the paragraphs relating to this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q49 Policy JP-H 4 Density of new housing

This is an important Policy in relation to the balanced suite of goals to achieve sustainable development across the Plan. The failure of this Policy could have a ricochet effect, with other policies, such as the delivery of public transport, being seriously compromised. With that in mind, we are concerned by the lack of evidence relating to the commitment to housing densities and believe this Policy is not currently Effective.

More information is needed about specific definitions of density and how this will be delivered on each site and in each Allocation. Without this evidence it is impossible to determine whether this Policy can be delivered. There is also no detail about what happens if a proposal is presented that does not meet the density requirements (including the acceptable lower density tests set out in the Policy, page 141). Will all such proposals be rejected?

In addition, there is no evidence in any of the documents that the GMSF team has sought any insights from other areas in the UK or Europe with similar issues. Freiburg, in Germany, is an excellent example of a university town that had faced growth pressures. Unlike GM, Freiburg actively engaged its residents in the development of a solution, which led to compact (high density), child-friendly, well-connected urban development. There is a good summary of their approach at this link [Freiburg: City of Vision | International Making Cities Liveable \(livablecities.org\)](https://livablecities.org/).

Finally, it is clear that it would be premature to release any green belt in advance of the Plan demonstrating that its density specifications are deliverable.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- the provision of clear definitions for all aspects of the density policy, including minimum densities, average densities and any thresholds that apply
- the provision of clear implications for proposals that do not meet density requirements
- the provision of evidence showing how density requirements will be delivered on each site and in each Allocation in the Plan
- the provision of evidence demonstrating that GM has sought information from other locations to ensure the valuable lessons learned are optimised in this Plan
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q50 Policy JP-G 1 Valuing important landscapes

We agree, wholeheartedly, that, as set out in the Policy on page 145, “*Development should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location*”, and we recognise the importance of the GMLCSA (paragraph 8.3, page 144), especially given the commitment to acknowledging its guidance (page 145) when implementing this Policy.

We are, therefore, disappointed that the sensitivity assessment returned a value of ‘M’ (Moderate), for many of GM’s highly valued landscapes. Carrington Moss, for example, not only has unspoiled views stretching for around 20 miles to the hills north of Manchester, it also has 10 Sites of Biological Importance (SBIs) on and around the moss (along with the SSSI that is specifically mentioned in the GMLCSA).

The GMLCSA document confirms (paragraph 3.11, page 18) that the following definition of sensitivity has been used “*Landscape sensitivity is the relative extent to which the character and quality of an area (including its visual attributes) is likely to change.*”

Whilst the Policy appears to support NPPF paragraph 174 (a), underestimating the sensitivity to change will not ensure our valued landscapes are protected and enhanced. As an illustration of our concern (using New Carrington, JPA33 as an example), an Allocation which will see 4 major roads, 5,000 homes and 350,000 m² of industrial and warehousing space constructed on, around and across a peat moss, impacting the Carrington ‘rides’ (a heritage feature) and changing the landscape exponentially, is considered to be Moderate in terms of sensitivity.

The sheer volume of traffic, especially HGVs, will significantly increase air, noise and light pollution in what is currently a tranquil area that has an intrinsically dark landscape (with only natural light currently benefiting the endangered wildlife, including bat species, and a large number of red listed birds). So, the Policy, therefore, is not consistent with paragraph 185 (page 53) of the NPPF. We also feel there is insufficient focus on the requirements of NPPF paragraph 130, page 39, particularly paragraph (c).

With the previous paragraphs in mind, we do not think this Policy is Positively Prepared, nor Consistent with National Policy. We also believe that the Policy is not Effective, given the Allocations do not meet the guidance mentioned in the final paragraph of the Policy (page 145). Again, using New Carrington (JPA33) as an example, where an Allocation does not follow the required guidance (GMLCSA, page 70).

Photographs showing current views and features can be found on the Friends of Carrington Moss website at this link <https://friendsofcarringtonmoss.com/photos-videos/>.

We note the Integrated Assessment (Natural Environment Topic Paper, page 59), confirms that this Policy has not been updated but that there have been updates to other policies within the Plan. This is appropriate assuming that the Allocations and other future development adheres to those policies.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- a review of the GMLCSA to ensure sufficient weight has been given to the sensitivity of our valued landscapes (preferably not a desktop exercise)
- clearer links are made between this Policy and the NPPF
- the provision of evidence showing how each Allocation performs when measured against the guidance in the GMLCSA
- withdrawal of any Allocation that is not aligned with this Policy



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- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q51 Policy JP-G 2 Green Infrastructure network

We agree totally with the sentiment behind paragraph 8.8 (page 146), which suggests that a high-quality network of green infrastructure (GI) is vital to GM's long term success, sustainability and resilience. It is also vital that this Policy is followed when implementing development.

We believe the description of the GI network needs to further reinforce the importance of these assets, so we would suggest the wording reflects this (for example, Development should be compatible with extensive GI, in a way that maximises the size and spread of such GI, with a particular need to increase the quantity and quality of GI in the denser urban areas).

Accessibility of GI is also extremely important (paragraph 8.8, page 147) and if GI is not accessible by residents (often for very good reasons), it should be classified differently to GI that is accessible. Using the New Carrington Allocation (JPA33) as an illustration, much of the green corridor that remains between Carrington and Sale West is not accessible by the public (that area contains, for example, United Utilities works, a solar farm, Manchester United's training ground, Sale Sharks' training grounds, Sale Rugby FC's training grounds, some farmhouses, a large National Grid site and two riding centres – to say nothing of the dual carriageway that the Plan intends to build across it, along with 3 other major new roads). Yet it is classed as GI. With much of the area to be developed, it will not perform what is expected of GI in this Policy. The Policy is, therefore, not Effective.

The Natural Environment Topic Paper confirms (paragraph 2.3, page 7) the key aims of the Government's 25 Year Environment Plan, including cleaner air and water, the protection of threatened species and the provision of richer wildlife habitats. The link to these aims should be made more explicit in this Policy.

As the Policy itself highlights (page 148), GI is a key component in GM's climate change action toolkit. Understanding the impact of new development in relation to the climate emergency action plans, for both individual Districts and GM as a whole, should be a key piece of evidence within the Plan. This is not currently visible, so we would suggest that the Policy is not Justified (or Consistent with National Policy – NPPF paragraph 154, page 45).

In addition, the Policy itself confirms (page 148) that a strategic approach will be taken to the protection, management and enhancement of GM's GI. This approach is being taken to protect and enhance the ecosystem services provided by GM's GI (page 148). The release of green belt, which invariably is highly valued GI and rich in biodiversity, often providing flood management, climate change mitigation and other ecosystem services is not consistent with this Policy.

The final two paragraphs within the Policy itself (page 149) need to be reworded. GM should not be planning development within, around or in close proximity to key GI assets (otherwise the value of those assets will diminish due to the air, noise and light pollution, to name just three types of harm that would arise, especially given that the Site Selection process for this Plan has targeted large development sites on green belt land). Again, this is a sign that the Plan is not Effective. It is inappropriate to use the evolution of the GI network as a reason for accepting development in such areas. Once key assets have been developed on, damaged or destroyed they may not be able to perform as expected at any point in the future.

We were surprised to note that a site such as Carrington Moss (discussed further in our response to Q108, JPA33) was not listed at Table 3 (page 30) of the Natural Environment Topic Paper, which shows a list of strategic opportunity areas and sites for green infrastructure enhancement (this is especially odd as Carrington is mentioned as a GI Opportunity Area in the Policy itself, page 149, and the New Carrington Topic Paper mentions green infrastructure 60 times, so it is clearly an important element of the development). We request that this is updated in the Natural Environment Topic Paper document.

We note that the paragraphs commenting on the Integrated Assessment (Natural Environment Topic Paper, page 60), confirm that this Policy has not been updated but there have been updates



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to other policies within the Plan to address the points raised. This is appropriate assuming that the Allocations and all other future development adhere to those policies.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- update the GI description to ensure GI is paramount, rather than development (eg Development should be compatible with extensive GI, in a way that maximises the size and spread of such GI, with a particular need to increase the quantity and quality of GI in the denser urban areas)
- classify accessible GI differently to non-accessible GI
- a more explicit link to the key aims of the Government's 25 Year Environment Plan
- rewording of the final two paragraphs within the Policy itself (page 149) to ensure that development is not planned within, around or in close proximity to key GI assets
- the provision of clear evidence showing how each Allocation performs when measured against the Policy, including how local and regional plans to tackle the climate emergency will be impacted by the Allocations, particularly the release of land designated as green belt
- withdrawal of any Allocation that is not aligned with this Policy
- update Table 3 (page 30) of the Natural Environment Topic Paper, to include Carrington Moss as a strategic opportunity area for green infrastructure enhancement
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q52 Policy JP-G 3 River valleys and waterways

The KPIs at page 394 of the main document are particularly weak in relation to our green credentials.

Please remove the words “wherever possible” from paragraph 8.23 (page 152).

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- removal of the words “wherever possible” from paragraph 8.23 (page 152)
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q53 Policy JP-G 4 Lowland wetlands and mosslands

The Policy recognises (paragraph 8.26, page 155) that areas of Lowland Wetland and Mossland have significant green infrastructure (GI) and are rich in biodiversity and geodiversity resources. The Policy goes on to confirm that (paragraph 8.27, page 155) *“Habitat enhancement and reinstatement could deliver considerable ecological benefits, as well as providing a large-scale recreation resource that could make a significant contribution to the health and quality of life of residents. Landscape enhancements would also support other objectives such as improving water quality, mitigating flood risk and reducing soil erosion,”* demonstrating the significant value of these habitats, not only in support of Nature Recovery and the health and wellbeing of residents, but also in GM’s action plan to mitigate climate change and achieve carbon neutral goals (reducing a significant source of emissions and locking in additional carbon).

The weight that should be afforded to the importance of retaining these habitats is further reinforced in paragraph 8.28 (page 155), which not only confirms the unique range of wildlife that is supported in this environment but also that *“lowland raised bog is now one of Western Europe’s rarest and most threatened habitats”*.

The Policy is confusing because, on the one hand, it emphasises the scale and magnitude of the importance of these sites (paragraph 8.30, page 156) and in the Policy itself (same page). It then goes on to say (again, in paragraph 8.30, page 156) that *“Some sections of undeveloped mossland, however, are considered appropriate for future development.”*

We believe this statement, which is also included in the Natural Environment Topic Paper (page 57) in response to consultation comments (given the inclusion of Lowland Wetland and Mossland habitats in some Allocations), should be removed as it renders the Policy unsound (not Positively Prepared). It should be noted that undeveloped mossland is still mossland, still important GI, still rich in biodiversity, still capable of being restored to capture carbon.

The paragraph (8.30) goes on to suggest that these sites are *“well-located to make a notable contribution to delivering more balanced and inclusive growth.”* We would argue that these are not well-located developments. New Carrington (JPA33), for example, is located in an isolated community (paragraph 10.1, page 23, New Carrington Topic Paper), has no plans to introduce trains or trams, and no commitment to the provision of additional bus services (validated via our FOI request). As set out in the Plan documents, the area is currently very poorly served by public transport (paragraph 10.14, page 29, New Carrington Topic Paper) and our response to Q108 highlights why we believe it has little prospect of becoming sustainable.

Whilst the paragraph (8.30) continues by confirming that *“Such areas will only be developed where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.”* We can find no evidence in the Plan that sets out the ecological value of those Allocations that are in areas of undeveloped mossland. This information should be provided before a decision is made about those Allocations, particularly as we understand that green belt will be released on the day this Plan is approved. If such information is not available, the Allocation should be withdrawn from P4E and handled through the Local Plan process, once the required information is available.

The Natural Environment Topic Paper further confirms the significance of this habitat (page 40/41) in setting out the advice received from Natural England about the necessity of safeguarding GM’s soil resources that have high environmental value. This includes deep peaty soils as they bring huge natural capital benefits.

Natural England suggests (paragraph 3.53, page 41) that *“Decisions about development should take full account of the impact on soils, including their intrinsic character and the sustainability of the many ecosystem services they deliver”*. This means that appropriate information should be available prior to making a decision about an Allocation or any other development that will abide by the policies within this Plan.



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Natural England goes on to suggest (paragraph 3.54, page 41) that the Plan should (i) safeguard the long term capability of BMV agricultural land as a resource for the future, (ii) avoid development that would disturb or damage other soils of high environmental value and (iii) ensure GM's soil resources are conserved and managed in a sustainable way.

We believe this Policy should explicitly incorporate the advice from Natural England and evidence should be provided which sets out the impact of each Allocation on local soil resources. If such evidence is not available, the Allocation should be withdrawn from P4E and handled through the Local Plan process, once the required information is available. Being compliant with the Natural England guidance will also ensure compliance with National Policy (as highlighted in paragraph 3.55, page 41).

For the reasons set out above, we believe the Policy is not Justified.

In addition, the Policy is not Effective. Accepting development on these unique habitats will not only destroy areas rich in rare biodiversity and wildlife (England Peat Action Plan, page 10), such developments will be complex and expensive (hence the New Carrington Allocation, JPA33, only proposing an Affordable Housing contribution of 15% on green belt land). The peat will have to be removed or piled. Either solution will release significant levels of carbon into the local atmosphere. The area will then need to be infilled (another expense and more carbon contributions as HGVs will bring the infill to the site). So, this Policy is not only expensive in financial terms, it also brings a high cost to the climate and to the health of local residents.

We also believe some aspects of this Policy are not Consistent with National Policy.

In recognising that re-wetting peatland areas and returning them to their natural state could make a significant contribution to achieving targets for reducing carbon emissions, in addition to the other benefits of improved water quality, nature and flood mitigation, the England Peat Action Plan, published in May 2021, page 4, (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1010786/england-peat-action-plan.pdf) sets out the vision to reverse the decline of England's peatlands, with the aim of preventing further loss of peatland habitats and to restore more peatland landscapes to their natural state.

Whilst we understand NPPF paragraph 210 (page 59) refers to the extraction of peat for commercial purposes, we believe the extraction or piling of peat to support developments in Lowland Wetland and Mossland areas does not meet the spirit of this NPPF requirement.

Furthermore, as mentioned above, NPPF paragraph 174 (page 50) confirms the expected protections for sites such as these.

The NPPF defines irreplaceable habitats (page 68) as those that would be *“technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity”*. Whilst Lowland Wetland and Mossland is not explicitly included as an example, these sites should be considered to be irreplaceable habitats as it is known that peatlands take thousands of years to form and [they only generate 1 millimetre of peat each year](#).

Finally, we note that the paragraphs commenting on the Integrated Assessment (Natural Environment Topic Paper, page 63), confirm that this Policy has not been updated but there have been updates to other policies within the Plan to address the points raised. This is appropriate assuming that the Allocations and all other future development adhere to those policies.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:



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- removal of the sentence in paragraph 8.30, page 156 that proposes to consider some sections of undeveloped mossland appropriate for future development
- the provision of evidence showing the ecological value of those Allocations that are in areas of undeveloped mossland. If this information is not available, the Allocation should be withdrawn from P4E and handled through the Local Plan process, once the required information is available
- explicitly incorporation of the advice from Natural England in this Policy
- evidence which sets out how each Allocation performs when measured against this Policy, including the impact on soil resources, BMV land and whether any high value (peaty) soils will be disturbed or damaged by the planned developments – if it is not possible to provide this information as part of this Plan, the Allocations should be withdrawn and reconsidered within Local Plans once the information is available
- set out how high value (peaty) soil resources will be conserved and managed in a sustainable way
- clearer links are made between this Policy and national initiatives, such as the England Peat Action Plan, and the NPPF
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q54 Policy JP-G 5 Uplands

Please refer to our response to Q53 Lowland Wetlands and Mosslands. Many of the same points apply.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- explicitly incorporation of the advice from Natural England in this Policy
- set out how high value (peaty) soil resources will be conserved and managed in a sustainable way
- clearer links are made between this Policy and the NPPF
- withdraw any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q55 Policy JP-G 6 Urban Green Space

The KPIs at page 394 of the main document are particularly weak in relation to our green credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q56 Policy JP-G 7 Trees and woodland

We wholeheartedly support this Policy but believe it should also specifically incorporate hedgerows, which are highly valued and also provide essential ecosystem services. With this gap, we believe the Policy is not Positively Prepared.

Our hedgerows provide an essential habitat resource, including food and shelter for many species, such as the harvest mouse, foraging bats, roosting birds and, of course, the hedgehog. They form essential corridors along which wildlife can travel, they provide respite from the wind and also a barrier which prevents loss of valuable soils. They provide the traditional boundary services for both agricultural and livestock management and are an important part of our cultural heritage and historical records. They are a key asset in GM's climate change action portfolio, with potential to support the reduction of pollution and flooding, the regulation of our water supply and in carbon storage. They are also a screen from unsightly development and provide privacy to homes, with the added benefit of being a source of berries for jams and material for various crafts.

In addition, the Policy should be strengthened to make explicit reference to reducing the loss of existing trees and hedgerows, particularly mature trees and historic hedgerows, across the Region. Many are lost each year to development. This could be reduced with more involvement of local residents and more effort to avoid such losses. With this in mind, we believe paragraph 8:45 (page 161) should be strengthened and reference should be made in the Policy to the [Hedgerow Regulations 1997](#).

Given the importance of this Policy, we would have expected to see evidence that sets out the current and expected tree coverage (and historic hedgerows) in each of the Allocations. Without this evidence, the Policy is not Justified because the availability of such information may result in different decisions about those Allocations.

We agree that GM should be aspiring to raise the level of tree cover to at least the national average (paragraph 8.44, page 161) and believe this should be just one of the KPIs set out on page 394.

We note that the paragraphs commenting on the Integrated Assessment (Natural Environment Topic Paper, page 66), confirm that this Policy has not been updated but there have been updates to other policies within the Plan to address the points raised. This is appropriate assuming that the Allocations and all other future development adhere to those policies.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- update this Policy to include hedgerows and reference should be made to the Hedgerow Regulations 1997
- the provision of evidence showing the current and expected tree (and hedgerow) coverage in each of the Allocations
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q57 Policy JP-G 8 Standards for greener places

We agree that the use of defined standards can help to ensure that there is sufficient quantity and quality of green infrastructure to meet GM's needs but feel that this Policy should be strengthened by including reference to comprehensive compliance with Environmental and Climate Change regulations. We also believe that collaboration with residents is essential, not just in the defining of these standards, but also in monitoring compliance.

We believe these gaps mean the Policy has not been Positively Prepared and request that the wording is updated.

We note that the paragraphs commenting on the Integrated Assessment (Natural Environment Topic Paper, page 67), confirm that this Policy has not been updated but there have been updates to other policies within the Plan to address the points raised. This is appropriate assuming that the Allocations and all other future development adhere to those policies.

The words "wherever possible" need to be removed from the Policy (page 163).

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- reference to comprehensive compliance with Environmental and Climate Change regulations
- to collaboration with residents, not just in the defining of these standards, but also in monitoring compliance
- removal of the words "wherever possible" from page 163
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q58 Policy JP-G 9 A Net Enhancement of Biodiversity and Geodiversity

The Policy recognises (paragraph 8.48, page 163) that achieving “*a major net enhancement of biodiversity value and improving access to nature are key priorities for this Plan and central components of the wider approach to green infrastructure and the natural environment*”, and we believe they are crucial to GM creating a sustainable Plan. The Greener GM Policies should be given equal weight to those policies seeking accelerated growth through this Plan.

The Policy confirms (paragraph 8.50, page 164) that a Nature Recovery strategy, which incorporates habitat restoration and creation, is needed, along with a diverse Nature Recovery Network. An important aspect of this being the Greater Manchester Wetlands Nature Improvement Area (paragraph 8.51, page 164), which is rich in biodiversity and geodiversity resources that can not only support nature recovery and the health and wellbeing of residents but, also, GM’s action plan to mitigate climate change and achieve carbon neutral goals (reducing a significant source of emissions and locking in additional carbon).

The Policy also confirms (paragraph 8.53, page 165) the significance of GM’s best and most versatile agricultural land and the importance of safeguarding valuable soil resources.

Yet the Policy proposes to denigrate these essential environments, despite their prioritisation in the Government’s 25 year environment plan and the recently published England Peat Action Plan, by suggesting that (paragraph 8.53, page 165) because of “*the overall scale of development that needs to be accommodated, a limited amount of development on high grade agricultural land is necessary as it is critical to the delivery of wider development proposals*”. We totally disagree. As set out in our response to Q44, Q45 and Q46, neither the scale nor the location of development is a requirement of this Plan and greater weight should be given to the importance of retaining these critical habitats. With this in mind, we believe the Policy has not been Positively Prepared and that the proposal for development on high grade agricultural land should be removed.

In addition, the Natural Environment Topic Paper further confirms the significance of these habitats (page 40/41) in setting out the advice received from Natural England about the necessity of safeguarding GM’s soil resources that have high environmental value.

Natural England suggests (paragraph 3.53, page 41) that “*Decisions about development should take full account of the impact on soils, including their intrinsic character and the sustainability of the many ecosystem services they deliver*”. This means that appropriate information should be available prior to making a decision about an Allocation or any other development that will abide by the policies within this Plan.

Natural England goes on to suggest (paragraph 3.54, page 41) that the Plan should (i) safeguard the long term capability of BMV agricultural land as a resource for the future, (ii) avoid development that would disturb or damage other soils of high environmental value and (iii) ensure GM’s soil resources are conserved and managed in a sustainable way.

We believe this Policy should explicitly incorporate the advice from Natural England and evidence should be provided which sets out the impact of each Allocation on local soil resources. If such evidence is not available, the Allocation should be withdrawn from P4E and handled through the Local Plan process, once the required information is available. Being compliant with the Natural England guidance will also ensure compliance with National Policy (as highlighted in paragraph 3.55, page 41).

For the reasons set out above, we believe the Policy is not Justified. We also do not believe the Policy is Justified as clear details of GM’s irreplaceable habitats have not been produced as evidence, particularly in relation to each of the Allocations set out within the Plan. This evidence is important as document 07/01/03, Biodiversity Net Gain Proposed Guidance for GM (page 31) confirms that “*Irreplaceable habitats and nationally protected sites within the scheme boundary must be identified. Impacts to these areas should be avoided, mitigated and, as a last resort,*



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compensated for on a case-by-case basis, having regard for their unique biodiversity value and by following national legislation, policy and guidelines”.

In addition, the Policy is not Effective. The importance of these sites is made clear in document 07/01/03, Biodiversity Net Gain Proposed Guidance for GM (page 12), which suggests that developments should *“Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve no net loss or net gain.This is because these features are not tradable and need to be dealt with separately, and in accordance with the relevant legislation and planning policy”.*

Accepting development on these unique habitats will not only destroy areas rich in rare biodiversity and wildlife (England Peat Action Plan, page 10), such developments will be complex and expensive (hence the New Carrington Allocation, JPA33, only proposing an Affordable Housing contribution of 15% on green belt land). The peat will have to be removed or piled. Either solution will release significant levels of carbon into the local atmosphere. The area will then need to be infilled (another expense and more carbon contributions as HGVs will bring the infill to the site). So, this Policy is not only expensive in financial terms, it also brings a high cost to the climate and to the health of local residents.

We also believe some aspects of this Policy are not Consistent with National Policy.

In recognising that re-wetting peatland areas and returning them to their natural state could make a significant contribution to achieving targets for reducing carbon emissions, in addition to the other benefits of improved water quality, nature and flood mitigation, the England Peat Action Plan, published in May 2021, page 4,

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1010786/england-peat-action-plan.pdf) sets out the vision to reverse the decline of England’s peatlands, with the aim of preventing further loss of peatland habitats and to restore more peatland landscapes to their natural state.

Whilst we understand NPPF paragraph 210 (page 59) refers to the extraction of peat for commercial purposes, we believe the extraction or piling of peat to support developments in Lowland Wetland and Mossland areas does not meet the spirit of this NPPF requirement.

Furthermore, as mentioned above, NPPF paragraph 174 (page 50) confirms the expected protections for sites such as these.

The NPPF defines irreplaceable habitats (page 68) as those that would be *“technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity”.* Whilst Lowland Wetland and Mossland is not explicitly included as an example, these sites should be considered to be irreplaceable habitats as it is known that peatlands take thousands of years to form and they only generate 1 millimetre of peat each year (<https://friendsoftheearth.uk/climate/why-peat-good-climate-and-nature-guide>).

We note that the paragraphs commenting on the Integrated Assessment (Natural Environment Topic Paper, page 69), confirm that this Policy has not been updated but there have been updates to other policies within the Plan to address the points raised. This is appropriate assuming that the Allocations and all other future development adhere to those policies.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- the removal of the sentence in paragraph 8.53, page 165, that proposes development on high grade agricultural land



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- the provision of evidence showing clear details of GM's irreplaceable habitats, particularly in relation to each of the Allocations
- explicitly incorporation of the advice from Natural England in this Policy
- evidence which sets out how each Allocation performs when measured against this Policy, including the impact on soil resources, BMV land and whether any high value (peaty) soils will be disturbed or damaged by the planned developments – if it is not possible to provide this information as part of this Plan, the Allocations should be withdrawn and reconsidered within Local Plans once the information is available
- set out how high value (peaty) soil resources will be conserved and managed in a sustainable way
- clearer links are made between this Policy and national initiatives, such as the England Peat Action Plan, and the NPPF
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q59 Policy JP-G 10 The Green Belt

This Policy needs to explicitly state the amount of green belt that will be lost, not the net figure of 1,754 hectares (Green Belt Topic Paper, paragraph 6.26, page 32). The gross loss of green belt is 2,430 ha of green belt, the equivalent of 3,400 football pitches (675 ha of new green belt is being proposed as part of this Plan). This loss of green belt has not been equitably spread across the region. Whilst the current average green belt land for the nine boroughs is 46.7%, Trafford, for example, currently has 37.6% of its land designated as green belt. Post the approval of this Plan, whilst the GM average green belt will be 45%, for Trafford, this figure will be 35%. The average net loss of green belt across the Plan area is 3.27% (Green Belt Topic Paper, paragraph 6.26, page 32), for Trafford, the net loss of green belt will be 6.7%, and for Bury 8.8%. To put this another way, the Green Belt Topic Paper sets out (paragraph 1.34, page 63) that, across the region, this Plan proposes 59.9% less green belt release than the 2016 GMSF but for the New Carrington Allocation (JPA 33), this reduction is only 43.7%.

This means that this Policy does not meet Objective 5 (main document, page 41) as residents who currently have less access to green belt land, will see that access reduced further as a consequence of this Plan.

In addition, we believe this Policy needs to be amended to fully focus on the protection and enhancement of the green belt, not on the reasons why green belt should be released (which are already set out elsewhere in the Plan). In its current form, the Policy is not Positively Prepared. Both the Policy and the Green Belt Topic Paper (GBTP) highlight the importance of economic growth more than the importance of the ecosystem services and other beneficial uses of our green belt (for example, GBTP, Appendix 1, paragraph 1.5, page 54, paragraph 1.13, page 56, paragraph 1.19, page 57). The statement at paragraph 1.32 (GBTP, Appendix 1, page 62) is particularly negative from the perspective of the protection of GM's green belt. The paragraph may be technically correct, but it appears to suggest that there is actually no protection of green belt land built into the NPPF, which we understand is not the Government's intention.

The GBTP (Appendix 1, paragraph 1.12, page 55) suggests that ensuring a thriving and productive economy in **all** parts of GM is a key priority within the Greater Manchester Strategy. The Policy confirms (main document, paragraph 8.54, page 166) that land designated as green belt currently totals approximately 46.7% of the Plan area and indicator of the land associated with the rural economy. This is almost 50% of the Region, yet there is surprisingly little focus throughout the Plan, including in this Policy, on the growth of the rural economy and the other ecosystem services provided by our existing green belt land. This growth should be given as much weight as the economic growth (set out elsewhere in the Plan) for other industries and services. We do not believe sufficient emphasis has been given to, nor evidence provided about, the benefits offered by our current green belt land.

We note that the Policy (main document, paragraph 8.56, page 167) suggests that the green belt role supports the retention of the identity of GM's cities, towns and smaller settlements. It does not mention that these rural areas have an identity of their own. The document should be updated to remove all references to the "city-region" (same paragraph), as describing GM in such a way, and suggesting it has a "complex urban form" (same paragraph), is erroneous. GM is a highly diverse region in which (as mentioned above) almost half the land area is rural/green belt.

Given the declarations of the climate emergency made by each district in GM, the GMCA and all the GM Health Authorities, we believe the Growth and Spatial Options should have been revisited to ensure that GM's assessed need (GBTP, paragraph 6.42, page 45) prioritises the climate emergency action plans. This may have resulted in less aggressive growth, more emphasis on the rural economy and green belt ecosystem services and a more balanced and sustainable Plan. Such a review should also have been circulated to residents for their insights and commentary as many people did not have the opportunity to comment at the time (2015) of the original consultation on the growth and spatial options (because the consultation was poor and awareness



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was low, young people – who will now be in their twenties and most affected by this Plan – were not involved and people who have moved into GM in the last 6 years also have not had the opportunity to comment).

We also feel that the priorities in the Plan, as set out in the Policy, are incorrect. The GBTP, paragraph 6.9 (page 25) suggests that the Plan will make “*a small net reduction in the total size of the Green Belt, so that the overall scale of growth can be accommodated*”. Given the climate emergency, the Plan should be focused the other way round. We suggest the wording should propose ‘**a small net reduction in growth to accommodate the retention of green belt as it is important to mitigating climate change, provides a number of ecosystem services and offers a variety of other beneficial uses.**’

In fact, the GBTP only mentions the climate emergency once in the whole document (paragraph 1.8, page 54), and does not mention climate change at all. This paragraph points out that the nine LAs in the Plan area consider the climate emergency makes the need for a sound and integrated approach to planning imperative. We agree and it is our understanding that spatial planning involves bringing about the most efficient use of land, by balancing competing demands, to ensure sustainable development. In the context of those declarations of a climate emergency, we believe much greater weight should be given to the use of land that addresses and mitigates climate change, particularly land that can support the reduction of flood risk, that alleviates air, noise and light pollution and that retains GM’s best and most versatile agricultural land.

On the basis of the above, the case for exceptional circumstances is not valid and not Justified. We disagree with the premise (main document, paragraph 8.60, page 167) that the “*need to deliver the positive long-term outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt*”. The Greater Manchester Strategy aims to ensure a thriving and productive economy in **all** parts of the region (as mentioned in the paragraph above), which includes those areas that are currently rural/green belt land. Given that the rural economy has been totally omitted from this Plan, we do not believe the case for exceptional circumstances has been made.

That Case for Exceptional Circumstances is set out in the GBTP Appendices. Appendix 1 (paragraph 1.3, page 53) suggests the other reasonable alternatives to the existing growth and spatial options paper have been considered. For the reasons set out above and those in our responses to Q44, Q45 and Q46, we disagree. We do not think the Government’s methodology for determining housing need (including the buffer) should be considered exceptional circumstances.

It is, however, clear from paragraph 1.21 (GBTP, Appendix 1, page 58) that green belt is being released to create a buffer for GM’s housing supply. As mentioned above, we cannot see any evidence that GM has processes in place to ensure the use of brownfield land is prioritised in advance of the use of any green belt. Furthermore, we set out in our response to Q46 the alternatives for provision of a buffer (if it is decided one is needed), rather than releasing green belt land.

Whilst the GBTP states (paragraph 6.9, page 25) that green belt sites will be released in a phased approach, our understanding is that all green belt will be released on the day this Plan is approved. We can find no evidence in the documentation that confirms how the GMCA and LAs will ensure brownfield developments are prioritised (including any new previously developed land that may arise following Brexit and the pandemic) in advance of any developments being made on GM’s green belt.

The level of harm resulting from the release of green belt is recognised (GBTP paragraph 6.8, page 25), including the consequent harm that may occur to the performance of the remaining green belt land in each Allocation area (GBTP, paragraph 6.35, page 38). It is important, therefore, that the loss of beneficial use (GBTP, paragraph 6.34, page 37) of current green belt, that is planned for release, is clearly evidenced to support the decision-making process.



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We also believe the Policy is not Effective. The GBTP suggests (Appendix 1, paragraph 1.23, page 59) that sites selected are in strategic locations that are, or are capable of being, well-served by public transport. This is not the case. The New Carrington Allocation, for example, has no plans for trains or trams and no commitment to increasing bus services (validated via our FOI request). In the same document, paragraph 1.27 (page 60) suggests that the selected sites are either in sustainable locations or are capable of being made sustainable – please see our response to Q108 (New Carrington Allocation JPA33) to see why we do not believe this is the case.

The GBTP, paragraph 1.25 (page 59) states that the case has been made for the release of green belt in sites chosen via the site selection process. We totally disagree for the following reasons:

- the Growth and Spatial Options Paper is not Positively Prepared as it has not considered the reasonable alternatives required to meet the needs of the climate emergency, furthermore, we do not believe it incorporates the recently introduced Natural Capital Investment Plan for Greater Manchester, which will help to ensure that the economic benefits of green infrastructure can be understood alongside other key indicators of economic performance (paragraph 12.13, page 389)
- the requirement to release green belt to meet the needs of housing and employment land supply has not been demonstrated
- the site selection process was not impartial and focused on larger sites in green belt, rather than smaller, more sustainable sites in urban areas
- appropriate weight has not been given to the importance of GM's green belt and the associated rural economy and ecosystem services it provides and the harm that will result from the release of 2,430 hectares of green belt
- the proposed opportunities that have been identified to help increase the beneficial uses of the remaining green belt will not compensate for the losses of green infrastructure and biodiversity.

Given that exceptional circumstances have not been demonstrated, this Policy and the intended release of 2,430 hectares of green belt land does not comply with NPPF paragraph 147 (page 43), making it unsound due to not being Consistent with National Policy.

Finally, the aim of enhancing the lives of all residents within the Plan area (main document, paragraph 9.1, page 174) cannot be met when this Plan is seeking to unnecessarily remove access to green belt from a large proportion of its residents, significantly impacting their health and wellbeing in a number of ways, including causing increased air, noise and light pollution, greater stress from the higher risk of surface water flooding and reduced opportunities for outdoor activities.

Modification:

We believe this policy can be strengthened and made sound by including the following commitments:

- the wording of the Policy needs to be amended to fully focus on the protection and enhancement of the green belt, not on the reasons why green belt should be released
- the Policy should state explicitly the amount of green belt to be lost and how those losses are spread across the region
- the Growth and Spatial Options should be revisited to provide a climate emergency focused option, prioritising climate emergency action plans, including the growth of the rural economy and the expansion of other green belt ecosystem services (incorporating insights from the Natural Capital Investment Plan for Greater Manchester)
- the Policy wording should be updated to propose 'a small net reduction in growth to accommodate the retention of green belt as it is important to mitigating climate change, provides a number of ecosystem services and offers a variety of other beneficial uses'



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- removal of all references in the documentation to a “city-region”, which is erroneous, given that almost 50% of the land area is rural/green belt
- the provision of evidence to show how GMCA and LAs will ensure development on brownfield land is prioritised in advance of any development on land currently designated as green belt (including any new previously developed land that arises following the impact of Brexit and the pandemic)
- the provision of evidence to demonstrate that the release of green belt land will not impact GM’s need to address the climate emergency, this should be provided for each Allocation that requires green belt release
- the provision of evidence to demonstrate the loss of beneficial use of existing green belt that is planned for release, including for each Allocation, evidence about the impact on rural businesses and/or ecosystem services currently performed within the Allocation area, together with an assessment of the natural capital value of the site and the openness/landscape
- clearer links are made between this Policy and the NPPF
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q60 Policy JP-G 11 Safeguarded land

The KPIs at page 394 of the main document are particularly weak in relation to our green credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q61 Policy JP-P 1 Sustainable Places

We agree that the unique character of all current neighbourhoods across GM is a key strength that must be retained (paragraph 9.9, page 176). This aspiration is not supported by the Plan's proposal to unnecessarily release green belt for development and much greater weight should be given to the positive contribution that such characteristics make to the daily lives of GM residents.

The Plan to impair local areas (which is undoubtedly what will happen for those who will lose local green belt) is unacceptable because there has been no meaningful engagement with residents throughout the six plus years of preparation. No workshops (even with those who will be directly impacted), very little communication or information sharing and no inclusion in the design process. Let's be clear, providing residents with 150+ documents to read, assimilate and comment on may be the minimum requirements of the planning process but cannot, in any way, be considered to be engagement. Many of GM's most vulnerable residents have been totally excluded from this process because it is not accessible to them or because it presents an overwhelming challenge to respond.

It is heartening to read that the Policy considers that *"Residents should be able to actively contribute to decisions about places that will effect them"* (paragraph 9.2, page 174), and that (point B, page 177) there is a desire to enable everyone to participate equally and independently.

We believe that high levels of genuine societal participation (paragraph 9.9, page 175) should have been a requirement of this Plan process, particularly in relation to the Allocations that require the release of green belt, and especially so given the feedback from previous consultations. As an example, in relation to the New Carrington Allocation (JPA 33), the Friends of Carrington Moss has repeatedly requested greater involvement, workshops and other means of engagement in the design process, without success. In fact, as set out in our response to Q108, we highlight the workshops **we** arranged, in which LA and landowner/developer representatives participated. Sadly, we have not been invited to attend any workshops arranged by others as part of the masterplan process.

Citizens are a largely untapped, free, talent pool and, with this in mind, we do not believe this Policy is Positively Prepared or Justified. We request that all the Allocations are withdrawn from this Plan and handled through the Local Plan process to enable genuine consultation with residents, who can bring huge benefits in terms of local knowledge, specific expertise and a wealth of ideas (and, typically, all free of charge to the Local Authority and developers).

We also believe that this Policy should require all Local Authorities to adopt (and adhere to) the Gunning Principles within all Statements of Community Involvement (SCI) for GM (<https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>). These principles should be applied to all future consultations, whether about Spatial Plans, Local Plans or specific applications. In addition, this Policy should require that all current SCIs are reviewed with local residents and are updated accordingly. Resident involvement in future updates to SCIs should be a requirement.

The KPIs at page 394 of the main document are weak in relation to our people credentials. There is no KPI, for example, that will measure whether societal participation (paragraph 9.9, page 175) has increased.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- withdrawal of all Allocations within this Plan (for handling through the Local Plan process) to enable genuine consultation with local residents
- the inclusion of the adoption of the Gunning Principles in all GM Statements of Community Involvement



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- the review and update of all GM Statements of Community Involvement with residents (with the Policy confirming that all future updates to SCIs will be undertaken in conjunction with local residents)
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q62 Policy JP-P 2 Heritage

We fully support this Policy and would like to ensure the current limited focus on our environmental heritage is extended, particularly in view of the commitment to update the existing records (paragraph 9.12, page 179), as recommended in the Historic Environment Background Paper 2020. The importance of conserving and protecting the Deer Park at Warburton and the Rides at Carrington Moss, for example, cannot be over emphasised. These environmental heritage assets, and other similar environmental heritage assets, also contribute significantly to GM's sense of place and distinctive identity (page 179) and should be protected from harm, both within this document and in Local Plans.

It would also be helpful, to support decision-making about the Allocations, to have a visible summary of the Heritage Assessments which covers each site. From a brief review of the documents available within this Plan, it seems that only one site (Seedfield in Bury) has been assessed as Green (08.01.01 Historic Environment Assessment Screening Report 2019). Twelve sites were assessed at Red (these are highlighted for concerns over the impact on designated and non-designated heritage assets) in 2019.

This summary would provide a synopsis, bringing together in a very brief document the information contained in the Historic Environment Assessment Reports, plus other relevant local information to provide clarity about the impact of the Allocations and to support decision-making.

Without this additional summary, we believe the Policy is not Justified as this additional evidence may provide more weight in the decision-making process when considering whether to seek alternatives to releasing green belt.

The KPIs at page 394 of the main document are weak in relation to our heritage credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- increase the focus on the environmental heritage in GM, including in the Policy wording itself
- provision of a brief summary of Heritage Assessment outcomes covering all the Allocations
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q63 Policy JP-P 3 Cultural Facilities

The KPIs at page 394 of the main document are weak in relation to our cultural credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q64 Policy JP-P 4 New retail and leisure uses in town centres

The KPIs at page 394 of the main document are weak in relation to our retail and leisure uses credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q65 Policy JP-P 5 Education, skills and knowledge

We recognise that GM has acknowledged the challenges with the supply of sufficient school and nursery places (paragraph 9.26, page 184), along with the priority of addressing these. We are, however, concerned that the current evidence does not confirm that there will be sufficient school places for the families moving into new developments nor that land has been set aside to provide new schools, where these are required, especially given that the proposed housing numbers will support around 450,000 additional residents in GM, many of whom will be families.

The New Carrington Allocation (JPA 33), for example, states (New Carrington Topic Paper, page 79) that the *“site will primarily deliver family housing at a medium density”*, yet we understand (following an FOI request) that Trafford has estimated the number of school places based on the assumption that 33% of the New Carrington homes will be 1 bedroomed dwellings. This assumption is not borne out by the information available about the developments that have already been given planning approval.

Our calculations suggest a number of pupils significantly higher than the 680 additional primary and 486 additional secondary school places that are set out in the New Carrington Topic Paper (paragraph 24.5, page 57). There is no mention of the number of additional nursery places that will be required. The New Carrington Topic Paper confirms (paragraph 24.6, page 58) that there are few primary school vacancies in the area. The paragraph goes on to suggest that the provision of a new school will be considered during the master planning process. We contend that this is too late. A decision will have been made to release the green belt and move ahead with the development without confirmation that there is sufficient land supply to meet the school places needed.

We believe such requirements should be considered prior to the decision to release the green belt and that clear evidence of the school and nursery places needed, and how they will be fulfilled, should be provided to support decisions about all the Allocations within this Plan. This gap in the evidence suggests that this Policy is not Positively Prepared.

The Policy is also not Consistent with National Policies because there is no evidence that it will meet the requirement of the NPPF, paragraph 95 (page 28) which outlines the importance of sufficient choice of school places for both existing and new communities. It is not enough to acknowledge (paragraph 9.26, page 184) that the Policy needs to ensure *“that there are sufficient school places in the right locations and at the right times to meet the needs of existing and new residents.”* The Policy needs to demonstrate that this Plan, as currently proposed, is compliant (not only with the NPPF, but also with Objective 9 of this Plan (page 43).

Furthermore, the school and nursery places provided need to be in locations that meet the needs of the sustainability objectives of the NPPF. This means parents should not have to drive their children to school.

In addition, the Plan suggests (main document paragraph 9.2, page 174), in relation to inclusion, that *“Residents should be able to actively contribute to decisions about places that will affect them, increasing empowerment and a feeling of ownership about the way in which Greater Manchester evolves.”* The decisions about these Allocations will have a significant impact of existing GM residents, yet there has been no active involvement or genuine consultation about these plans and the required collaboration involving residents suggested in paragraph 9.3 (page 174) has not yet begun.

With this in mind, we propose the Allocations are withdrawn from this Plan to enable the active involvement of local residents and the commencement of that required collaboration, with a view to the consequential decisions being address in the Local Plans.

We request that point 2 (page 185) of the Policy is updated to include nursery places (as well as school places)



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The KPIs set out at page 394 of the main document are weak in relation to our education, skills and knowledge credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- provision of information that confirms, in detail, the required school and nursery places that would result from this Plan and the land supply needed for the construction of any consequent new schools
- withdrawal of all Allocations to enable the active involvement of local residents and the commencement of required collaboration to increase inclusion, with a view to the consequential decisions being address in the Local Plans
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q66 Policy JP-P 6 Health

Whilst we fully support this Policy, we are concerned that there is insufficient evidence that the planned housing and employment construction, which could increase the population of GM by 450,000 people, is supported by the provision of appropriate levels of health and social care services. There appear to be no proposals, for example, for a new hospital within the Plan and we are aware of the current concerns about over-stretched health services.

We believe this renders the Policy unsound as it is not Positively Prepared. It is also not Justified as there is no evidence that the Allocations set out within the Plan will not result in the deterioration of the health and wellbeing of existing residents, and, particularly, will not lead to greater health inequalities (which would be contrary to the aims set out at paragraph 9.31, page 186).

We recognise that the Policy calls for a Health Impact Assessment for new development (point C, page 187), but believe such an assessment should have been provided to underpin decisions about each Allocation within the Plan, as these developments are likely to have significant impacts on existing residents (increases in air, noise and light pollution, for example, could result in increased health incidents for those who suffer from respiratory or cardiovascular issues).

New roads are proposed within the Allocations and we believe an early Health Impact Assessment may have resulted in alternative options being considered. In the New Carrington Allocation (JPA 33), for example, there are no plans for improved public transport (no trams, no trains and no commitments to improvements in bus services). So, despite GM's Transport Strategy aim to reduce car journeys by 50% (paragraph 10.25, page 200), the emphasis in that Allocation is on road network improvements, rather than seeking ways to reduce the reliance on the car. We believe this will lead to further health inequalities for some of Trafford's most vulnerable residents. Bucklow St Martins Ward, which includes the residents that will be most impacted by this Allocation, has the highest level of deprivation in Trafford by a significant margin (https://www.trafforddatalab.io/ward_profiler/?theme=Deprivation&name=Index%20of%20Multiple%20Deprivation).

The Government's Public Health briefing to promote active travel (May 2016 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf) suggests that *"it has been estimated that half of the UK's £10bn cost per annum of air pollution comes from road transport"* and that *"Disadvantaged areas also tend to have a higher density of main roads, leading to poorer air quality, higher noise levels and higher collision rates"*. *Health inequalities are further exacerbated because "residents of deprived communities tend to travel less than the better off, but feel the impact of other people's travel. In short, increasing car dependency has led to increasing unfairness"*. The strategy to build these new roads on and across Carrington Moss is a clear example of this.

There is no reference in the document to the potential for other options, such as community transport, to play a transitional role in creating the demand for bus services, nor have alternative (more sustainable) options, including those put forward by the community, been considered. The Plan appears to make public transport improvements a long-term intent, rather than a short term opportunity.

More should have been done to seek other ways of addressing the expected traffic congestion resulting from this significant development (5,000 homes, 350,000 m² employment space). An early Health Impact Assessment could have raised this requirement, especially as there are pre-existing former rail connections in the area.

In addition, we request that the words "as far as practicable" are removed from the first sentence of the Policy itself (page 187) and the words "where appropriate" are removed from point 1 on the same page.

Finally, the KPIs at page 394 of the main document are weak in relation to our health credentials.



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Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- provision of evidence to confirm the Plan is supported by sufficient health and social care services for new and existing residents
- provision of evidence, for each Allocation, to confirm that there will not be a negative health impact for existing residents as a consequence of these developments
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q67 Policy JP-P 7 Sport and recreation

For this Policy to deliver a more inclusive Greater Manchester (paragraph 9.1, page 174) more consideration needs to be given to the loss of sport and recreation facilities that will ensue from the planned release of 2,430 hectares of green belt, as set out elsewhere in this Plan.

It will not, for example, enhance the lives of residents in the (JPA33) New Carrington area (paragraph 9.1, page 174) when those residents are no longer able to traverse the mosslands with ease. Whilst the Plan suggests that a significant corridor of green belt will remain (point 25, page 361) within the Allocation area, much of that corridor is not accessible to the general public (it hosts, for example, United Utilities works, a solar farm, Manchester United's training ground, Sale Sharks' training grounds, Sale Rugby FC's training grounds, some farmhouses, a large National Grid site and two riding centres – to say nothing of the dual carriageway that the Plan intends to build across it, along with 3 other major new roads).

It will not enhance the lives of those people who currently walk, cycle or horse ride the many routes across Carrington Moss, including the Transpennine Trail, because they will be participating in those activities next to those highly polluting major new roads. There are over 1,000 horses stabled in the area and, not only will their activities be severely constrained as a consequence of these plans, but the stabling and livery services, along with the local supply chains of these rural businesses, will be significantly impacted.

As can be seen from the above paragraphs, the New Carrington area currently has a high focus on sport and recreation and many of those activities are focused on children and young people. The severe impact of increases to air and noise pollution that will be a consequence of unnecessary development in this area will affect many of those participants, some of whom may suffer very serious outcomes.

Given the benefits of physical activity (paragraph 9.36, page 188) and the goal to positively change the lives of GM residents through physical activity and sports (9.34, page 187), more weight needs to be given to the impact of development on existing sport and recreation facilities. In particular, evidence should be included for each Allocation to demonstrate that there will be no impact on existing sportsmen and women from the increased air and noise pollution that will arise during and following development.

In addition, in ensuring the continued availability of sport and recreation facilities (paragraph 9.38, page 188), reference should be made to the importance of air quality standards in and around those amenities. There has long been evidence that air pollution has unfavourable effects on the respiratory and cardiovascular system. The proximity to emissions from high volumes of traffic are of particular concern. [Studies](#) have also shown that exposure to air pollution can be seriously detrimental to an athlete's health and performance and [athlete's themselves have started to make the connection](#).

The KPIs at page 394 of the main document are weak in relation to our sports and recreation credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- provision of evidence for each Allocation to demonstrate that there will be no impact on existing sportsmen and women from the increased air and noise pollution that will arise during and following development
- include a requirement in the Policy that air quality monitoring should be undertaken at all GM sports and recreational facilities (indoor and outdoor) and actions should be taken to mitigate any poor air quality standards that arise



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- the Policy should direct that new sports and recreation facilities should be located in areas with low air pollution
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



Places for Everyone Response

Q68 Policy JP-C 1 An integrated network

This Policy, overall, is welcome and we wholeheartedly agree with the statement set out at paragraph 10.1 (page 193) that a key priority for GM is *“to deliver an integrated network with world-class connectivity that keeps Greater Manchester moving and that drives prosperity whilst protecting the environment, improving air quality and transitioning to a zero carbon future”*. We do not, however, think this Policy **includes sufficient emphasis on the actions needed to move to sustainable transport**, particularly in the areas covered by the Allocations, as expected by PPG, paragraph: 001 (Reference ID: 54-001-20141010).

Recognising the challenge (paragraph 10.22, page 198) is not sufficient, the Policy must drive actions which are complemented by those set out in each District's climate emergency action plan. This lack of focus is clear from the statement in paragraph 10.5 (page 193), which suggests that traffic congestion is a key challenge. We agree, there are problems during rush hour (as there are in all areas of the UK) but this statement could be qualified by a commitment to, for example, provide more reliable, frequent and affordable public transport in all areas of GM, reduce opportunities for car parking and to increase the number of park and ride options.

The significance of the climate emergency is finally acknowledged in paragraph 10.7 (page 193), which highlights the importance of moving away from travel by car. We believe paragraphs 10.7, 10.8 (page 194), 10.9, 10.10 and 10.11 should be given far greater prominence in the document and should be moved to the start of this section.

The importance of the move to sustainable transport is reflected in the confirmation at paragraph 10.12 (page 195) that traffic is a major contributor to poor air quality and the subsequent impacts on the health and wellbeing of communities (and wildlife). It is also emphasised in paragraph 10.17 (page 196), which confirms that the population growth set out in this Plan could lead to over 800,000 additional residential trips each day (and that there could also be increases in traffic in the GM area as a result of growth in neighbouring areas). The 'so what' factor is how these challenges are addressed with clear actions to increase sustainable transport.

Whilst the Vision for 2040 (paragraph 10.25, page 200) is for half of all daily trips to be made by public transport or active travel, the Transport Delivery Plan (document 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026) is not focused on supporting this aim, and the requirement for modal change is certainly not reflected in the Allocations. For the New Carrington Allocation area, for example, the only commitment within the Transport Delivery Plan (page 84) is the construction of a new road (the Carrington Relief Road). There are no plans for trains or trams, despite the area having a former railway line. There are also no commitments to increase bus services (validated via our FOI request). There are proposals for improvements to bus infrastructure, but these are not a commitment in the Transport Delivery Plan. This approach is not aligned with the Policy, which suggests that (page 201) transport investment will follow the Global Street Design Guide hierarchy (which places active travel and public transport first, and people in personal motorised vehicles last).

To ensure the Policy is acted upon, with specific emphasis on the prioritisation of sustainable transport, all the commitments set out in the document 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026 should be reviewed and investment should be targeted at sustainable options. All new roads should be removed from the Plan for further consideration and consultation with residents.

There is also a distinct lack of, clear and easily digestible, robust evidence supporting the desire for modal change as set out in PPG paragraph: 002 (Reference ID: 54-002-20141010), which suggests that such evidence will, among other benefits, support the ability to create choice of different modes of transport.

In addition, PPG paragraph: 005 (Reference ID: 54-005-20141010) highlights the need for producing a transport assessment in collaboration with all key stakeholders. Yet, residents, as key



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stakeholders, have not been involved. Consultation and engagement has been very poor, workshop requests have not been addressed, information has not been supplied. In fact, in a letter to the Secretary of State (Robert Jenrick) on 23rd August 2019 (attached as evidence), the GMCA set out their engagement plan for the next iteration of the document. It is notable that the workshops with green belt groups (mentioned on pages 3, 5 and 6), particularly around transport and infrastructure issues, did not take place.

We note with interest that document 03.01.04 (PfE Strategic Viability Assessment Stage 2 Allocated Sites Amendments) mentions (section 1.5, page 9) a series of consultations relating to viability with various individuals and organisations, yet it has not been possible to engage with residents at all.

Furthermore, we do not believe the Gunning Principles have been adopted given the lack of involvement of residents who are directly impacted by the Allocations. Trafford's Statement of Community Involvement (2015), also attached as evidence, for example, states (paragraph 2.47, page 16) that *"The Council has made extensive use of Stakeholder Workshops in the past to enable interested bodies to discuss planning issues in a detailed and supportive forum. This will continue in the future and will be particularly used at the early stages of plan preparation. A record will be kept of Stakeholder Workshop proceedings."* We are not aware of any workshops that were held in the early stages of developing the plan for the New Carrington Allocation or the Carrington Relief Road. In fact, as mentioned above, our requests for workshops have not been addressed and our requests for information have remained unfulfilled.

Despite the significant volume of documentation relating to transport provision for specific Allocations, it is impossible to determine the following as a minimum requirement to support decision-making:

- current traffic figures relating to the Allocation area (separating HGVs from cars, and residents from employees)
- increases in traffic from proposed developments already approved within the Allocation area (separating HGVs from cars, and residents from employees)
- increases in traffic from the proposed developments within the Allocation (separating HGVs from cars, and residents from employees)

We believe this information should be provided in advance of any decision to release green belt because this information is crucial to determining:

- whether the plan is deliverable and sustainable
- what level of traffic (including from outside the Allocation area), and, therefore, what level of air, noise and light pollution, will impact existing residents and wildlife.

Whilst we appreciate that the capacity of the road network has been assessed (we assume in accordance with PPG paragraph: 007 Reference ID: 54-007-20141010), the figures that have been produced for the Allocations are not clear or easily digestible. As an example, we certainly cannot find any reference to HGV traffic numbers in the Trafford Transport Locality Assessment documents, which appears to be a specific requirement of PPG 007 *"where there is known to be a significant level of heavy goods vehicles traffic, a classified count (identifying all vehicles separately) should be provided"*.

The information needs to be made available in a way that residents can understand and that sets out clearly the impact of the Allocation on the local area.

In addition, paragraph 10.2 (main document, page 193) states that good connections *"permeate all aspects of life in the Plan area"* and paragraph 10.4 (page 193) suggests GM's boroughs are already highly connected places. We do not believe either statement is true of rural areas and there is no focus on how this aspect of the integrated network will be improved. There is no information, for example, on the areas of GM where there is poor digital and mobile connectivity, which should be included within the Plan to support strategy development and decision-making.



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Furthermore, where the transport implications of the Allocations require new major roads to be constructed, these will impact the health and wellbeing of local residents and wildlife. Such major affects should mean that the highest standards of consultation are implemented in advance of decisions being taken. Neither the Gunning Principles nor the local SCI have been followed in Trafford, for example, in relation to the Carrington Relief Road, which is part of the New Carrington Allocation (JPA 33). Further information about this is set out in our response to question 108, however, we believe that this Policy should emphasise the importance of genuine consultation and engagement in relation to these initiatives.

The KPIs at page 394 of the main document are weak in relation to our integrated network credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- move paragraphs 10.7 (page 193), 10.8 (page 194), 10.9, 10.10 and 10.11 to the start of this section to give them greater prominence
- the commitments set out in document 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026 should be reviewed and all planned road construction should be withdrawn, investment should, as stated in the Policy, focus on active travel and public transport options as a priority
- the construction of new major roads should be withdrawn from the Plan for further consideration and consultation with local residents, given the climate emergency
- provision of clear and easily digestible information for residents about the impact of the proposed Allocations on traffic in their area, this information (with the detail set out in the paragraphs above) should be provided in advance of any decision to release green belt
- provision of specific information about HGV numbers, where there is expected to be high levels of HGV traffic
- clear evidence that each District's Statement of Community Involvement and the Gunning Principles have been adhered to in considering transport issues
- this Policy should be updated to emphasise the importance of **genuine** consultation and engagement in relation to transport initiatives
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q69 Policy JP-C 2 Digital connectivity

We fully support this Policy, but once again, it does not address the inequalities faced by GM's rural areas. Whilst it is recognised (paragraph 10.32, page 202) that digital and mobile access can be challenging in rural areas, there is no requirement in the Policy itself to improve this situation. So, the way the Policy is currently articulated, new development will have access to high-speed, full-fibre connectivity (page 203) and our existing rural communities will remain challenged by the lack of consistent services. This renders the Policy not Positively Prepared.

The KPIs at page 394 of the main document are weak in relation to our digital connectivity credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- update the Policy (page 203) to confirm that focus will be given to improving connectivity in GM's rural areas
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q70 Policy JP-C 3 Our public transport

We welcome this Policy and believe public transport improvements should be prioritised above any building of major new roads in GM. This approach appears to be supported by the GM Transport Strategy 2040 but is not what is being proposed in the Transport Delivery Plan, where the New Carrington Allocation (JPA 33), for example, has a commitment to a new major road but no commitments to actual public transport improvements.

We agree totally that public transport plays a vital role in tackling congestion (paragraph 10.37, page 203) and, in driving GM's objective of zero-net growth in motor vehicle traffic, it will also support the reduction of air pollution. With this in mind, we'd like to see this Plan give much more prominence to the importance of public transport improvements, particularly bus services which have the potential to reach all communities. Many solutions are already included within the transport documents (as summarised at paragraph 10.38, page 203) but we are concerned that some residents (particularly those in GM's rural areas) will be left behind. The additional work that has already been identified (paragraph 10.44, page 204) should be prioritised and more should be done to engage the public in service definition (ie where services are needed). There currently appears to be a reliance on desktop studies, such as the one completed for bus services in New Carrington (without any resident involvement at all).

We recognise that delivering the Transport Strategy will be costly (paragraph 10.43, page 204) and complex (paragraph 10.44, page 204) but GM needs to verify that, in an attempt to ensure maximum benefit is achieved (paragraph 10.43), the locations that remain "*not particularly well-served by public transport*" (paragraph 10.43) are not all in GM's rural areas.

Whilst the Policy suggests (paragraph 10.35, page 203) that a key factor in supporting a growth of public transport services is population density, this does not appear to be borne out by reality. The planned New Carrington development, for example, will see 5,000 homes and 350,000 m² employment space bringing both residents and workers needing a choice of travel options in the area. Yet, there are no plans for trams or trains (despite an existent, albeit former, railway line) and no commitments to additional bus services. We accept that there are plans to create enhanced infrastructure for buses to use, but the experience of local residents is that promises to significantly improve public transport (that began with the 2006 Unitary Development Plan, continued in the 2012 Core Strategy and now are being proposed once again in this Plan), will undoubtedly remain unfulfilled. This suggests the Policy is not Positively Prepared.

One opportunity to address this is to introduce a strong suite of KPIs to monitor actual improvements to existing public transport services (those currently set out at page 394 of the main document are weak in relation to our public transport credentials).

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- strengthen and prioritise this Policy within the Plan
- increase the emphasis on public transport to support GM's rural areas
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Places for Everyone Response

Q71 Policy JP-C 4 Streets for all

We totally support GM's ambition for 50% of all journeys to be made via active travel or public transport by 2040 (paragraph 10.57, page 207). Given the climate emergency and recognition that 2040 is now less than 20 years away, if this Policy is to succeed, there is no business case for the construction of any new major roads (because within 20 years they should not be needed). This renders the Policy not Positively Prepared.

GM should not plan to fail and should focus 100% on improving public transport and active travel routes. If this strategic aim (50% of all journeys) is adhered to, the congestion on GM's existing routes will be significantly reduced, so even "*targeted improvements to the highway network*" (paragraph 10.61, page 208) should not be considered a priority.

Persuading residents to change their mode of transport will be a challenge, so some emphasis should be given in this Plan about how to achieve this.

The KPIs at page 394 of the main document are weak in relation to our streets for all credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- this Policy should be fully focused on active travel options and supporting public transport facilities, no priority should be given to the construction of new major roads
- some emphasis should be included within the Policy about how residents will be persuaded to change their modes of transport
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Places for Everyone Response

Q72 Policy JP-C 5 Walking and cycling network

We welcome and fully support this Policy. The KPIs at page 394 of the main document are weak in relation to our walking and cycling credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



Places for Everyone Response

Q73 Policy JP-C 6 Freight and logistics

We support the intentions of this Policy and agree with the assertion at paragraph 10.70 (page 211) that *“more freight should be moved by rail and water”* but this ambition is not followed by the Allocations accompanying this Plan. The New Carrington Allocation (JPA 33), for example, is located right next to the Manchester Ship Canal, yet there are no plans to make use of it as an alternative to the excessive HGV traffic which is currently using local roads (see our response to Q108), despite resident requests and the alternative options proposed.

Given that each District in GM, the GMCA and all Health Authorities have declared a climate emergency, this Policy should be amended to make addressing climate change a priority. We do not believe it is either Positively Prepared or Justified to suggest (paragraph 10.71, page 212) that *“Many logistics sites in the Plan area will be reliant on road-based freight, taking advantage of the strategic location within the national motorway network”*. This approach will lead to significant numbers of HGVs on GM’s roads, resulting in increases to air, noise and light pollution and is contrary to those declarations of a climate emergency. Suggesting that (same paragraph) this Policy reinforces the importance of delivering strategic highway improvements is counter-productive to the desire to drive traffic onto water and rail. We believe the Policy needs to be amended to propose that if logistics sites in the Plan area will be reliant on road-based freight, they should not be approved.

We accept that the pandemic has accelerated the move to online retail and the expansion of other businesses that have increased smaller scale deliveries (paragraph 10.72, page 212) but there are no proposals in this Policy to encourage residents to seek other ways of receiving those deliveries (such as pick up from local libraries, for example, or post offices, or some local businesses).

We believe point 1 in the Policy itself (page 212) should be amended to the following wording ‘Protecting and enhancing existing rail- and water-served sites and associated infrastructure’

We do not support the expansion of air freight activities at Manchester Airport. Given the climate emergency, the Policy should be amended to state that air freight activities will not be expanded at Manchester Airport until climate-friendly air fuel is available and in use.

The KPIs at page 394 of the main document are weak in relation to our freight and logistics credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- prioritise climate emergency action plans within this Policy
- amend the Policy (paragraph 10.71) to state that, if logistics sites in the Plan area will be reliant on road-based freight, they should not be approved
- incorporate an action in the Policy to encourage residents to seek other ways of receiving goods (rather than delivery to their doorstep)
- amend the Policy to state that air freight activities will not be expanded at Manchester Airport until climate-friendly air fuel is available and in use
- amend point 1 in the Policy itself (page 212) the following wording ‘Protecting and enhancing existing rail- and water-served sites and associated infrastructure’
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q74 Policy JP-C 7 Transport requirements of new developments

This Policy needs to be significantly strengthened. We wholeheartedly agree with the statement at paragraph 10.75 (page 213) that *“Increased traffic is often one of the biggest concerns for existing residents when faced with new development”*. This is made even more challenging for residents when, as set out in our response to Q68 (JP-C 1 An integrated network) and Q108 (New Carrington Allocation JPA 33), the only commitment is a new road, across a peat moss, with no committed improvements to *“public transport, cycling and walking that can benefit both new and existing communities”* (paragraph 10.75, page 213) and no meaningful engagement with communities, allowing their local knowledge to be used.

As currently articulated, this Policy is not Positively Prepared.

Given the climate emergency and the impact of traffic on the health and wellbeing of both citizens and wildlife, we also agree that it is critical to get decisions right, not only about the design of new development (paragraph 10.74, page 213), but also the location (paragraph 10.73, page 212).

It is also essential that the Policy makes it clearer that the requirement to ensure new developments are *“planned and constructed with walking and cycling as the primary means of local access”* (page 214) is not negotiable.

We welcome the wording in point 6 (page 214 of the Policy itself), which confirms that, in order to meet the requirements of the Policy itself, new or amended public transport services will be subsidised where the development would otherwise have inadequate public transport access. It should be stressed in the Policy that, if an area cannot be provided with good public transport (paragraph 10.76, page 213), that area will not be considered suitable for development.

The Policy should explicitly state that, where an Allocation (or a future planning application) does not meet the requirements of this Policy, it should be withdrawn.

The KPIs at page 394 of the main document are weak in relation to the transport requirements of new developments credentials.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- amend the wording in the Policy to make it clearer that the requirement to ensure new developments are *“planned and constructed with walking and cycling as the primary means of local access”* (page 214) is not negotiable
- amend the wording in the Policy to stress that, if an area cannot be provided with good public transport (paragraph 10.76, page 213), that area will not be considered suitable for development
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



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Q108 Trafford - JPA 33: New Carrington

We have commented on the lack of alignment with the Policies in this Plan in our response to [Q31 Policy JP-Strat 11 New Carrington](#). We have also set out some commentary about the supporting documents in relation to the New Carrington Allocation in our response to Q31. Please refer to that response as we have not repeated those comments here.

Misleading Statements and Information

There are many misleading and disingenuous statements throughout the documentation that relates to this Allocation. One example is paragraph 11.320 (page 364) which suggests that the Allocation will provide improved transport, social and green infrastructure. We demonstrate in our responses below that this statement is wholly incorrect. The paragraph also suggests that there will be a single new community that links to existing towns and villages. This is also incorrect. In Partington, for example, the new community will have its own amenities and is separated from the existing community, it even has its own label, 'East Partington'. Similarly, the new development in Sale West is separated from the existing communities by landscape features (existing woodland) and the Warburton Lane community will be separate from Warburton. The Carrington developments have already been approved and are being constructed, so are not referenced here. In addition, a single new community is not desirable for the reasons set out in our response to paragraph 4ii (page 359) below.

In addition, the New Carrington Masterplan (Section 2, page 8) describes the vision to transform Carrington, Sale West and South Partington (another new label). Yet it does not mention the impact to Partington itself, nor to the other villages/areas that will be severely impacted by this Allocation, Warburton (which will be heavily affected), Dunham and Broadheath.

Another example of the misleading statements in the document is highlighted at paragraph 11.328 (page 365), which suggests that the site will be accessible by bus and tram to other parts of Trafford. As we have set out below and in other parts of our response, there are no plans for trams or trains and no commitments to improved bus services to the Allocation area (validated via our FOI request). This is misrepresentative at best and is perceived by the community as highly deceptive.

Furthermore, there are inconsistencies throughout the documentation too. Paragraph 11.322 (page 364) for example, suggests that there will be four distinct residential character areas across the allocation, not a single new community as suggested above.

There are also inconsistencies that relate to the numbers set out in the different documents within the Plan. The main document, for example, states that this Allocation will deliver:

- around 5,000 units, of which 4,300 will be delivered in the Plan period - this suggests around 700 homes will be delivered beyond the Plan period (point 2, page 358)
- around 350,000 sqm (gross) of employment opportunities for industry and warehousing (point 9, page 360), there is no reference to how much will be delivered beyond the Plan period

The New Carrington Masterplan suggests:

- 5,000 dwellings and up to 380,000 sqm employment (page 56)
- approximately 4,300 dwellings and 350,000 sqm of employment space in the GMSF Plan period (page 64)

So, one could assume that around 30,000 m² employment space will be delivered beyond the Plan period. Yet, document 03.03.04 (Allocations list) suggests this number is 11,205 m², a figure hidden on page 73 of the New Carrington Masterplan (document 10.09.06). Previous iterations of the document suggested the employment space would total 900,000 m² (New Carrington Topic Paper, page 101).



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The New Carrington Topic Paper (paragraph 10.7, page 25) suggests there will be approx. 370,000 m² employment floorspace in the plan period. The same document mentions 350,000 m² employment spaces in many paragraphs, so we can only assume this is an error. There is no mention in either the main document or the New Carrington Topic Paper of the 11,205 m² employment space to be delivered beyond the Plan period.

Document 09.01.15 (Transport Locality Assessment, New Carrington) suggests paragraph 6.21 (page 65) that the residential units have been reduced to match the 4,300 mentioned above but the employment space appears to have remained at the previous number of 410,000 m². With 1,418 resident units and 370,000 m² employment space considered to be committed within the Reference Modelling Scenario. Yet, paragraph 6.2.3 (page 65) suggests that all employment space is assumed to be in the committed quantum of development - is this 350,000 m², 370,000 m² or 410,000 m²?

Document 09.01.27 (New Carrington Transport Locality Assessment Addendum) is equally obscure. Paragraph 4.1.1 (page 15) suggests that a total of 3,330 dwelling units (comprising 199 plus 3,131 homes) have been considered (with 1,558 units included in the Reference Case (paragraph 4.1.3, page 15)). The figures for employment have changed to 92,160 and 280,000 m² respectively. These changes to the Reference Case are not mentioned in paragraph 3.2 (page 11). It should be noted that these numbers do not total the 4,300 dwelling units and 350,000 m² employment figures expected.

Furthermore, we are unclear about whether the employment traffic numbers include HGVs and if so, how have those numbers been calculated as it appears the calculations relate to passenger car units per hour (document 09.01.15, Table 6, page 66). We are also unclear about whether the 2040 numbers incorporate the 2025 numbers (or whether those numbers should be added together to calculate a total), for example, in document 09.01.27, Table 3, page 17.

It should be noted that the references to the regeneration of brownfield sites in this Allocation, or the former Shell Carrington industrial estate (for example, paragraph 11.350, page 369), are incorrect as these brownfield sites already have planning approval and the land is being brought back into use outside of this Plan. We would assume that risks such as the contamination raised in paragraph 11.350 have been dealt with in the Planning Application process. These inaccurate references permeate the whole suite of documents but to be clear, what is in scope for this Allocation is the area on and around the second largest peat moss in GM, grade 2 agricultural land and woodland habitats that make up 169 hectares of green belt plus protected open land.

This Allocation and the supporting documents should, therefore, be totally focused on that specific area. We set out in our response to Q31 the difficulties of assessing the impact of the Allocation given the different values provided in relation to homes and employment space used in the various supporting documents to this Allocation.

In addition, throughout the New Carrington related documents, the graphics relating to this Allocation are distorted and unrepresentative. They do not point out, for example, that much of the remaining green corridor between Carrington and Sale West (over 80 hectares) is used by businesses and is not accessible to the general public. They do not show the land that will be taken by the dual carriageway that is proposed to become the Carrington Relief Road, nor the other 3 major roads planned for the area. In fact, quite the opposite. Paragraph 16.1 (page 44) of the New Carrington Topic Paper (NCTP) "*sets out the indicative location and extent of the proposed strategic green spaces and illustrates the contextual relationship between open space, development and existing communities*" and is accompanied by Figure 10: Green Infrastructure Plan (page 45), which gives a totally misleading view of the available green space following development of this Allocation.

This results in a perception that this Plan and its associated supporting documents have been written more like a developer's brochure than a factual report of the implications of significant development planned for the Region, rendering the Allocation not Positively Prepared. We believe



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the documentation should be reviewed and updated to ensure the statements made throughout are factually correct and deliverable.

We would also like to take this opportunity to highlight the impact of the misleading statements within the GMSF documentation in relation to the consultation responses. In the 2019 consultation, for example, the New Carrington Policy set out that the Plan enabled the redevelopment of the extensive former Shell Carrington industrial estate but did not state that, at that time, it would result in the release of 240 hectares of green belt (the equivalent of 340 football pitches). In analysing the consultation responses, we found that many of those who 'agreed' or 'mostly agreed' with the proposals included comments such as the following:

- *"basically a brownfield area"*
- *"appears minimum impact on green belt"*
- *"can't see a flaw, doesn't seem to use green belt land"*
- *"agree because this is a redevelopment of an old industrial estate so not greenbelt land"*.

Like the previous consultation, many stated that they agreed with the development on brownfield land but not the release of the green belt.

It is, therefore, evident that it is important to clearly set out the facts, without any omissions so residents (and Councillors) can review a complete set of data and make a sound judgement about the impact on the local area.

We struggle to understand, for example, how building roads, housing and industrial/warehousing can *"Integrate into and reflect the character of the historic landscape;"* paragraph 4i (page 359) when the current landscape is peat moss, grade 2 best and most versatile agricultural land and woodland.

We also struggle to understand how the development can *"Integrate successfully into Partington and the wider New Carrington allocation, both in terms of physical linkages and the ability to understand the wider area as a distinct place"* (paragraph 4ii, page 359), when to do so would merge the township of Partington with the villages of Warburton and Carrington and the village of Carrington with the township of Sale. This would mean the outcome for the retained green belt land would be totally inconsistent with the purposes of the green belt as set out in the NPPF.

Protecting Environmental Assets

Paragraph 25, page 361 suggests that the Allocation will provide a significant green corridor that is:

- accessible – yet over 80 hectares of the remaining green belt corridor is not accessible as mentioned above
- protected – yet the habitats in that remaining corridor will be significantly impacted by the air, noise and light pollution that follows this development – there is no indication of the measures that will be taken to protect them
- high quality – there is no indication of how the quality of the green infrastructure will be measured.

Paragraph 27, page 362 suggests that the impact of development will be mitigated and the environmental quality and accessibility of the remaining green belt land will be improved but there is no indication of how or when this will be delivered.

We are delighted that:

- wildlife corridors and stepping-stone habitats will be retained, created or enhanced within the development areas (paragraph 29, page 362)
- natural environment assets will be protected and enhanced (paragraph 32, page 362)
- enhanced ecosystem services will be delivered (paragraph 33, page 362)
- clear and measurable net gain in biodiversity will be secured (paragraph 34, page 362)



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- habitats will be protected and enhanced (paragraph 35, page 362)
- important landscape views and features will be retained (paragraph 37, page 362)
- local landscape character will be conserved and enhanced (paragraph 38, page 362), especially areas such as Warburton Deer Park and Carrington Moss, which have particularly high landscape sensitivity (paragraph 11.343, page 368)
- landscape buffers will be provided across the site (paragraph 39, page 362) – it should be noted that substantial buffers should be provided across the whole site, not just at Warburton Lane
- New Carrington has been identified as a Green Infrastructure Opportunity Area (paragraph 11.330, page 367)
- existing ecological features will be enhanced as part of the development (paragraph 11.340, page 367)

Yet, there will be 4 major new roads fracturing those corridors and the resulting air, noise and light pollution will cause significant harm to the biodiversity and ecology on the site. The level of human and vehicle traffic in the area will result in population decline or decimation for the endangered wildlife species that currently breed and feed on Carrington Moss. It is hard to understand how landscape views and features will be retained when residents and users of Carrington Moss will be looking at (and hearing) huge volumes of traffic rather than seeing the hills 20 miles away and hearing birdsong. This is contrary to the advice given in document 07.01.06 (GMSF Landscape Character Assessment (2018)) which suggests amongst other guidance (page 70) that open and long ranging views across the mossland should be maintained.

This current destination for social prescribing will be changed beyond compare and will no longer be the peaceful place of quiet reflection that so many residents have found very welcome during the pandemic and so helpful to their mental and physical health and wellbeing.

Given those plans to construct four major new roads across the mosslands, the document should provide clear evidence about how the ecosystem services benefits, set out above, will be delivered.

Protecting Red Listed Birds and Endangered Wildlife

It should also be noted that the green belt and protected open land in the scope of the Allocation area has been considered to be the mitigation for the impact on the red listed birds and endangered wildlife species that have been disturbed by the planning applications that have already been given approval. The officer report to Planning Committee for the Heath Farm Lane planning application (94949 /HYB/18), for example, mentioned (paragraph 232, page 100) that similar habitats in the adjacent open arable fields would provide suitable habitat to support the nesting lapwing and skylarks displaced from the area to be constructed. If those fields are now to be used to construct housing, employment and roads, that mitigation can no longer be provided. In addition, which land area would these declining populations of red listed birds and endangered wildlife be expected to move to next? The reality is that this Allocation would cause further decline for those species.

The Carrington Relief Road (CRR) and the other highways mentioned at paragraph 19 (page 360) will create islands of homes and wildlife habitats in a sea of air, noise and light pollution. In combination, these roads, the housing and the industrial/ warehousing developments will severely impact important environmental assets (such as the local sites of biological importance), the populations of red listed birds and endangered wildlife and the health and wellbeing of residents and users of the sports facilities in the area.

With all these points in mind, and those set out below, we believe the Allocation is not sustainable, will bring increased health risk to local children and will irreparably damage important wildlife habitats. This renders the Allocation not Positively Prepared. It should be withdrawn and reviewed, with residents, as part of Trafford's Local Plan, with consideration and significant weight being given to provision of sustainable modes of transport for both people and freight.



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Impact of the Carrington Relief Road on Irreplaceable Habitats

Through an FOI request, we received the response from Natural England to an information sharing event held by Trafford related to the Carrington Relief Road (which is included within this Allocation and is mentioned further below), option F is the route across the peat moss (option A is the existing road). Their comments include the following:

“5.3 Option F Risks The environmental risks have not been included in this section although they were included in Chapter 5.2 (Option A Risks). We think this presents an inaccurate and unbalanced view of the environmental constraints and it is Natural England’s view that Option F would be considerably more damaging than Option A.”

Yet this advice appears to have been ignored in the latest document to be presented to Trafford Council and the proposal to select Option F (taking the road across the peat moss) has been agreed on 27th September 2021 (we continue to oppose this decision). This is despite the risks set out by Natural England in their advice, which suggested:

“The proposed Option F Route would involve development on areas of deep peat and is in close proximity to Lowland Raised Bog, listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. Blanket Bog/Peat represents the largest terrestrial carbon store in the UK. Peatlands also perform an important role in water catchment management-both water quality and water storage. As such there is widespread concern that development in these areas may have adverse impacts on the biodiversity, carbon value and water management functions of these areas.”

“Development on peat will cause permanent damage of the habitat and lead to a huge loss of carbon to the atmosphere, this would appear to conflict with Trafford Council’s commitment to tackle climate change and work towards carbon neutrality for Trafford. The current Trafford Core Strategy includes the objective to ‘protect and enhance the Mosslands as a natural carbon sink to mitigate the effects of climate change.’ (RCO12).”

“Damage to Carrington Moss Site of Biological Importance (SBI) and relic bog habitat – NPPF (para 175c) that specifies: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran tress) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”. Blanket bog is an irreplaceable habitat that should be protected. Development on peat will destroy a much larger area of habitat than the actual footprint of development due to hydrological dependency/linkages.”

Natural England go on to provide further advice in an Annex.

This decision has been made without any consideration of the alternative options that could have been proposed by residents (we have not been given the opportunity to share our ideas, despite our repeated requests). No options for reducing traffic have been considered, such as actually delivering increased public transport, establishing community transport or car share initiatives or identifying opportunities to reduce road freight traffic.

We believe this renders the Allocation not Positively Prepared, not Justified, not Effective and not Consistent with National Policy.

Importance of Restoring the Peat Moss

Document 07.01.20 (Stage 2 GM Green Belt Study - Beneficial Use - Appendix I – Trafford) confirms (page 14) that the majority of the Allocation area is within the Greater Manchester Wetlands NIA boundary, incorporating numerous SBIS and indicating areas of high biodiversity.

We believe it is important to restore the whole of Carrington Moss, not just those parts that are in the retained green belt (paragraph 11.341, page 368) as these peaty soils bring huge natural capital benefits (Natural England advice, Natural Environment Topic Paper, pages 40/41). Our discussions with Cheshire and Lancashire Wildlife Trusts do indeed suggest that the whole area (of existing green belt land) is an important component of the GM Wetland Ecological Network

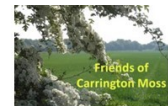
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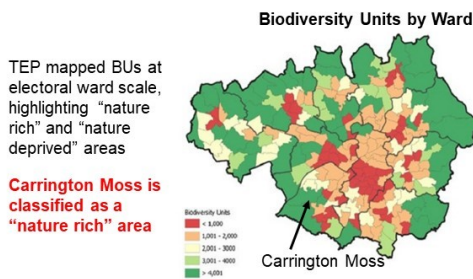
(paragraph 11.341, page 368) and is capable of restoration. There are also direct and indirect costs that would arise following a decision not to restore the moss, some of these costs are financial, some relate to health and wellbeing (of both humans and wildlife) and others relate to the condition of the planet.

In addition, The Environment Partnership (TEP) has assessed the current state of the natural environment across GM, and their review (<https://online.fliphtml5.com/xzflx/thqr/#p=1>) estimated how many Biodiversity Units (BUs) there are in each of GM's 10 boroughs. Trafford (at 41k BUs) is the **second lowest** in the Region, just above Manchester City itself, significantly behind the leading Authority, Oldham (with 139k BUs), and not even comparable to Tameside (95k BUs), which is a similar size in terms of area and population to Trafford.



When Trafford is starting almost at the bottom of the table ...

shouldn't we have a Transformation Strategy that significantly increases our biodiversity units?



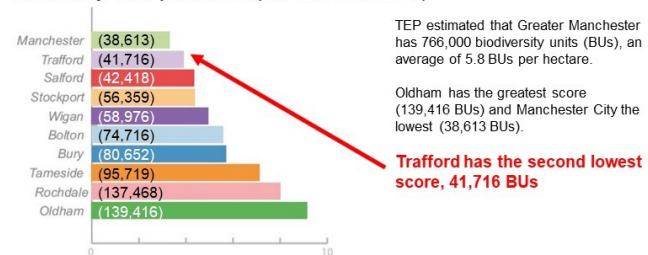
TEP assessed the current state of the natural environment. Their analysis estimates biodiversity units (BUs) present at a landscape scale. They state that "A BU is measured using Defra's Biodiversity Metric 2.0. The number of BUs on any piece of land depends on the habitats present, their quality, condition and connectivity. For example, a species-poor road verge or playing field would have only 2 BUs per hectare, whereas heathlands, reedbeds, mature native woodland can score over 20 BUs per hectare".

Greater Manchester aims to be "a place at the forefront of action on climate change, with clean air and a flourishing natural environment".*

*Source: GMSF paragraph 3.1

If the New Carrington development had already been in place, Trafford would be at the bottom of this table!

Biodiversity Units per Hectare (and in total for the LA)



The Integrated Assessment GMSF Scoping Report 2021 (Document 02.01.01) recognises, page 148, the importance of Manchester's Mosses and Wetland habitats. The document also points (page 149) to the GM Biodiversity Action Plan (GM BAP), "which identifies a list of habitats and species considers as priorities for nature conservation". One of the habitats is Lowland Raised Bog, the species list includes the Water Vole and the Willow Tit. All of these are found on Carrington Moss.

We have significant concerns about the plan to construct housing, employment and roads on the second largest peat moss in GM, which currently provides a huge number of valuable ecosystem services, including managing surface water flood risk (see our webpage for the feature we call Carrington Lake for more information <https://friendsofcarringtonmoss.com/carrington-lake-2/>). Residents will request confirmation from Trafford that their homes will not suffer from surface water flooding as a consequence of this development. This should be possible to demonstrate (paragraph 51, page 364) and guarantee if Trafford has confidence that this is the right plan for the area.

It should also be noted that the GMSF Integrated Assessment 2019 (page 20 of the New Carrington Topic Paper) highlighted (see paragraph 8.4) that the previous iteration of this plan had performed negatively against the IA objectives of resilience to the effects of climate change, reducing risk of flooding and conserving/enhancing landscape.

We believe the disturbance of the peat, which Trafford suggest (paragraph 12.2, page 31, New Carrington Topic Paper) is 3m thick will also cause a massive carbon release event impacting



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Trafford's (and GM's) carbon neutral aims. The restoration of this peatland would, conversely, result carbon being captured more effectively and will have a positive outcome in relation to carbon goals.

Destruction of Woodland Habitats

Furthermore, hundreds of trees will need to be felled to deliver the planned developments, including the 4 major new roads. This will also impact the carbon capture capabilities of the area and will lead to significant levels of increased carbon emissions and increased air, noise and light pollution. This is contrary to Policy JP-G 7 Trees and Woodland (page 161), which aims to protect and enhance GM's woodland and suggests (point 12, page 162) that where development would result in the loss of existing trees, replacements will be made on the basis of two new trees for each one lost. Whilst paragraph 37 (page 76, New Carrington Topic Paper) highlights that important landscape features such as the tree belts will be retained and paragraph 16.2 (page 45, New Carrington Topic Paper) suggests that new north/south tree planting will create a meaningful green corridor, there is no mention of the volume of trees to be planted nor that this corridor will be fractured by the new major roads, leaving wildlife in small, highly polluted, islands, which is not an effective solution for local biodiversity and ecology. We believe more detail is needed to enable communities to understand how the existing tree belts will be impacted and the intended solutions to mitigate the losses, including how air, noise and light pollution will be mitigated, especially along the major transport corridors (as set out in paragraph 53, page 364). This is particularly important because it is now recognised that planting woodland on peat moss is inappropriate, so new woodland habitats may not be possible in much of the area.

Eliminating these essential ecosystem services will impact the ability of the land to support the mitigation of the climate emergency (paragraph 45, page 363), resulting, therefore, in the Allocation not meeting its own Policy requirement.

Redesignating the Protected Open Land

We are also pleased that the sensitivity and heritage value of the sites within the Allocation has been recognised (paragraph 11.324, page 364 and paragraph 11.346, page 368), with Warburton medieval Deer Park and the areas of deep peaty soils being particularly highlighted as having potentially significant heritage value. It should be noted that parts of the Allocation area have been reviewed twice by Planning Inspectors and the protected open land at Warburton has been found to be unsuitable for development for a variety of reasons (in the Examination for the 2006 UDP document and, most recently, in PINS reference: APP/Q4245/W/19/3243720). These decisions render the land at Warburton Lane inappropriate for inclusion in the Allocation. We believe that this land should be redesignated as green belt, along with the other protected open land within the Allocation area.

An Unsustainable Site

As mentioned above, the document suggests that the site will primarily deliver family housing at a medium density (paragraph 11.325 (page 365) but this suburban option is the least sustainable of those available, especially given the relative isolation of the area (paragraph 10.1, page 23, New Carrington Topic Paper). New Carrington will be, for the most part, accessed by car as this, the largest housing Allocation in the Plan, brings no trams, no trains and no commitment to increased bus services (validated via our FOI request).

This is confirmed in document 09.01.04, which suggests (paragraph 4.42, page 53) that the low level of sustainable trips generated (around 15%) reflects the nature and location of the Allocations where public transport provision is lower than in established higher density urban areas. This confirms our view that the site selection process was flawed. This is reinforced by the comments in document 09.01.04, paragraph 5.17 (page 66) which reflects that the impact of the Allocations shows a trend over time of increased reliance on car travel and reduced public transport patronage. This also leads (Summary, page 71) to the associated increases in air pollution and carbon emissions and (paragraph 8.7, page 82) transport challenges, presented by the Allocations,



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that need to be planned for. We believe alternative options in more sustainable locations should be considered as a priority.

We note with interest that paragraph 14 (page 360) suggests that cycling, walking and public transport will be prioritised over the private car, yet the only commitment for this Allocation area in the Transport Delivery Plan (document 09.01.02) is for the Carrington Relief Road (CRR), which is currently planned for construction across the second largest peat moss in GM. As mentioned above, given the impact on the residents of GM of the significant level of development proposed in this Plan, the document, its policies and all its supporting reports should be required to be factually correct.

That Transport Delivery Plan (document 09.01.02) also suggests, paragraph 115, (page 39), that the aim is to minimise road miles for freight. Yet, despite this Allocation area abutting the Manchester Ship Canal, there are no plans for sustainable freight set out in the document.

Alternatives to the Carrington Relief Road (CRR), paragraph 19 (page 360) have not been explored. We have worked with the local Parish Councils to seek options and produced a proposal to construct a bridge across the Manchester Ship Canal (see the pack on our website at this link <https://friendsofcarringtonmoss.files.wordpress.com/2020/11/201122-transport-strategy-carrington.pdf>). This bridge option was highlighted in Trafford's 2006 Unitary Development Plan (UDP, page 71) and their 2012 Core Strategy (page 80), so we do not understand why it has not been seriously considered over the past several years, since the GMSF began its journey, along with other options that could be developed in this Allocation that are much more sustainable than a dual carriageway across a peat moss. This option would connect HGVs to Irlam Wharf, directly opposite Carrington, on the other side of the Manchester Ship Canal, to enable modal change for HGV traffic.

As part of this initiative, we connected with Peel (owner of the Manchester Ship Canal) for advice on the most appropriate bridge to be included in the proposal and with a variety of other experts in the development of our alternative option to the CRR. Despite this alternative being presented by residents to Salford and Trafford Officers in November of 2020, it was not included in the options appraisal documentation that was presented to Trafford Executives in December 2020 but Trafford does suggest it is desirable in their recent paper about the [Carrington Relief Road to the Executive Committee](#). It should be noted that this is a different crossing to the one set out in paragraph 4.72 (page 75).

Another alternative option would be consideration of the development of a Wharf on the Carrington side of the Manchester Ship Canal. This would also support a modal shift to sustainable transport for the products shipped by around 200+ HGVs per hour in rush hour and 135 per hour outside of those times. Yet neither option has been considered.

In addition, there is a former railway line that runs right into the centre of the Allocation area. Over the 6+ years that it has taken for this Plan to reach Regulation 19 stage, Trafford could have explored the potential for reopening this line for both freight and passengers. We are aware that an organisation called Rail Futures has presented some options to Trafford. Yet this is another potential sustainable option that is not incorporated within the Policy.

The HS2 Golborne Link is also due to be constructed through Warburton, yet there is no mention in the Plan of the potential for that route to be used for freight traffic. All or some of these options could have been included within the Allocation to reduce the excessive road-based freight traffic caused by Trafford's overdevelopment of industry in the area.

Given it is clear that all the alternatives to secure sustainable transport have not been fully considered, their omission suggests that the Plan is not Justified. The only option that appears to have had any effort assigned is the construction of a major new road, which is not compliant with the policies in this Plan, or Trafford's declaration of a climate emergency.



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In addition, the Transport Delivery Plan (document 09.01.02) prioritises the CRR above the provision of any public transport services for the area (which, as we mention elsewhere, is described as being poorly served and isolated). This is contrary to Trafford's carbon neutral and climate emergency goals. Paragraph 11.331 (page 366) highlights that a significantly improved active travel and public transport network is central to the success of the Allocation, going on to suggest that development will be designed to encourage sustainable short journeys and promote healthier lifestyles. Yet the current design of the CRR shows the active travel routes right next to this major road which will have huge volumes of HGVs travelling at speed, which is both unhealthy and dangerous, so these aims are unlikely to be met.

We are at a loss to understand how the transport infrastructure improvements will “*promote modal shift from car travel to sustainable travel modes*” (paragraph 11.335, page 367), when no sustainable travel modes are committed within the Plan. It should also be noted that the NPPF suggests paragraph 110 (page 31) that it should be ensured that appropriate opportunities to promote sustainable transport modes can be, or have been, taken up. We do not believe this Allocation complies with this clause. It is, therefore, not Consistent with National Policy.

Furthermore, we do not believe the National Planning Practice Guidance has been followed, especially in relation to paragraph: 001 (Reference ID: 54-001-20141010), which suggests that the transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, and paragraph: 002 (Reference ID: 54-002-20141010), which suggests that a robust evidence base can inform sustainable approaches to transport at a plan-making level. Given our concerns about the lack of sustainable freight solutions, we also believe the requirements of paragraph: 005 (Reference ID: 54-005-20141010) and paragraph: 007 (Reference ID: 54-007-20141010) have not been fully considered.

Paragraph 11.331 (page 366) states that the development should have regard to the Greater Manchester Transport Strategy 2040 refresh, yet that document prioritises public transport and active travel, not road construction. It is not sufficient to suggest that bus infrastructure is critical (paragraph 11.332, page 366). Commitment to provision of the services is what residents need, especially given that public transport improvements have been promised in the 2006 UDP and the 2012 Core Strategy. These disingenuous statements do not help the credibility of this document. Furthermore, the TfGM Next Steps in Bus Franchising suggests (<https://tfgm.com/our-buses>) that this area will be the last to introduce the changes (currently timed for 2025 but this seems aspirational rather than firm). In the interim, the website suggests that TfGM and GMCA will plan bus services with a focus on those that support GM's economic recovery, rather than for those areas in greatest need.

As part of our response, we have completed the Transport for New Homes checklist for new housing developments. The checklist sets out the things that make new housing areas good to live in without dependence on cars. It has been compiled with the aim of promoting new housing that is well located, well designed, and with good sustainable transport links. The New Carrington development has, unsurprisingly, scored poorly. This checklist (attached as an additional response document) should be used to assess each Allocation.

What is clear is that the Transport Strategy aims to drive prosperity whilst protecting the environment, improving air quality and transitioning to a zero carbon future (main document, paragraph 10.1, page 193). The document goes on to say that a fundamental aspect of this will be minimising the need to travel (paragraph 10.23, page 199) and that a massive change is needed to people's travel behaviour so that the car is no longer the preferred first choice for travel (page 10.24, page 199).

This cannot happen if Councils and the GMCA keep prioritising roads over public transport and active travel. We believe the plan for 4 major new roads, set out in the New Carrington Allocation, is not consistent with the Transport Strategy vision for half of all daily trips to be made by public transport cycling and walking (paragraph 10.25, page 200). Nor is it consistent with the Policy itself, which suggests that (point 5, page 201) transport investment should adhere to the Global



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Street Design guide, which puts pedestrians at the top of the hierarchy and people in personal motor vehicles at the bottom!

In addition, the absence of alternatives to new roads will lead to further health inequalities for some of Trafford's most vulnerable residents. Bucklow St Martins Ward, which includes the residents that will be most impacted by this Allocation, [has the highest level of deprivation in Trafford by a significant margin](#). More should have been done to seek other ways of addressing the expected traffic congestion resulting from this significant development and residents should have been engaged in the design of the Allocation area to ensure their needs are fully met.

Traffic Numbers

Document 09.01.27 Transport Locality Assessments Addendum – Trafford (Table 4, page 18 GMA41 New Carrington traffic distribution) highlights that around 70% of the new traffic is expected to use the Carrington Spur. For the HGVs, the figure will be 100%, as there is no other route for these vehicles to use. This will take the traffic past a primary school which has a playing field that abuts the Carrington Spur. The children at this school will suffer from significant levels of air and noise pollution as a direct consequence of this Plan.

Furthermore, due to the heavy use of jargon and opaque numbers in the Transport Locality Assessments, we have repeatedly requested a workshop to walk through both the numbers and the process for the calculations, without success. We have also requested specific information about traffic numbers for the Allocation area for over 18 months, again, without success. We believe the following information is critical in decision-making in relation to this Allocation:

- current traffic figures relating to the Allocation area (separating HGVs from cars, and residents from employees)
- increases in traffic from proposed developments already approved within the Allocation area (separating HGVs from cars, and residents from employees)
- increases in traffic from the proposed developments within the Allocation (separating HGVs from cars, and residents from employees)
- we would also need to understand what level of traffic has been considered from outside the Borough, in particular, the traffic using the Warburton Bridge, which is proposed for renovation and upgrade as mentioned below.

We would also like the traffic numbers that will accrue from the approved planning applications that are outside of the Allocation area but within the Ward boundaries of Bucklow St Martins, St Marys Ward and Bowdon Ward.

Furthermore, we believe that baseline data, similar to that set out in document 09.01.04 (Transport Strategic Modelling Technical Note - Places for Everyone 2021), at Table 4.1, page 47 should be made available for each Allocation.

Given the excessive overdevelopment of industrial and warehousing in the Allocation area already, it is unreasonable that the figures for the huge numbers of HGVs which are disrupting residents' lives are not available, as an example, we incorporate some quotes from residents taken from the Carrington Parish Council facebook page:

"Was anyone else woken at 1.50am wagons thundering through the village, not good for mental health" JTB 10/9/21

"Yes I agree with you my bed shakes, in my living room if am stood on the floor you can feel the floor vibrating" JM 10/9/21

"I live at the far end of Ackers so not Manchester road end and still hear them like they coming through my bedroom" AB 10/9/21

"Speed of lorries driving through traffic lights at Carrington is ridiculous" RB 14/7/21



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“we keep saying the same, it's so unsafe, When the lights stay green during the night they go so fast and of course make the house shake” HB 14/7/21

As we mention above, the numbers set out in the Transport Locality Assessments (TLA) for Trafford (documents 09.01.15 and 09.01.27) are confusing and we have raised elsewhere in our response the lack of consistency between the various P4E documents and the numbers (housing and employment) related to the New Carrington Allocation area.

As mentioned above, the *“site will primarily deliver family housing”* (New Carrington Topic Paper, page 79). Those families will need to get their children to school and nurseries (we mention our concerns about the number of school places in the area elsewhere in this response) and employees will need to travel to work, given the limited local employment options lack diversity. So, as there are no trams, no trains and no committed improvements to bus services, it is clear that the traffic numbers (TLAs, Table 6, page 66 and Table 3, page 17 respectively), purporting to show the additional traffic to be generated by the New Carrington Allocation, are grossly underestimated.

We would particularly like to see clarity about how these estimated traffic numbers relate to the % of new households in the area by the dates shown. This is difficult as there is no access to the actual data used, nor is there clarity about the data included in the Reference modelling scenario

It should also be noted that the numbers mentioned in the documents do not appear to take into consideration any traffic from outside the area (typically Lymm and Warrington) which, as highlighted in the TLA (paragraph 11.2.3, page 106), will be attracted by the proposed dualling *“to the strategic route corridor along the Carrington Relief Road, Carrington Spur and M60 Junction 8,”* bringing yet more pollution to the area.

Employment Space

With reference to the employment space in the Allocation, over 250,000 m² of the 350,000 m² planned already has planning approval, so should not be considered within this Allocation. The remaining 92,160 m² is planned for development on green belt/protected open land and is, once again, all designated for industrial and warehousing, not alternative employment options.

The Clean Air Policy states (point 4, page 101) that GM will restrict and carefully regulate *“developments that would generate significant point source pollution such as some types of industrial activity and energy generation”*. We believe the Carrington area has already contributed more than its share of industrial and warehousing space in GM and it would be contrary to that policy and inequitable for local residents to suffer the health impacts from the proposed (almost 100,000 m²) further industrial and warehousing employment space, particularly because of the additional air, noise and light pollution residents will be exposed to. It would also not be compliant with NPPF clause 174 (e).

It should be noted that the [World Health Organisation](#) has announced (22nd September 2021) that it is reducing the maximum safe levels of key pollutants with PM_{2.5}: reduced from 10 µg/m³ to 5 µg/m³ (NB the legal limit is 20 µg/m³) and NO₂: reduced from 40 µg/m³ to 10 µg/m³ (NB the legal limit is 40 µg/m³). These levels will be phased towards the 2030 target date but this is clearly something that should be considered when determining the location of employment, particularly when it would lead to yet more HGVs on local roads.

As mentioned in paragraph 11.327 (page 365), the Allocation area already contains a number of hazardous installations and there are several more in very close proximity. We discuss this in our response to Q31 (New Carrington Policy) but would emphasise that we believe it would be both reckless and negligent to increase the risk to existing and new populations of residents (mainly families) and employees by increasing the number of people who may have to be quickly, safely and effectively evacuated from the area. We believe this renders the Allocation not Positively Prepared, particularly as there is no reference within the masterplan to evacuation of residents or



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employees who could be affected by an incident, an emergency or a disaster and how this would be achieved quickly, safely and effectively.

We would like the document to set out how Trafford will require employment and training opportunities to be made available to local people (paragraph 11, page 360), as the largest new employer in Carrington brought all their staff with them from their previous location. We are not aware that other businesses have prioritised the local workforce. The New Carrington Masterplan suggests (Section 3.1, page 10) that thousands of new jobs, across a wide range of sectors and skill-levels, will be accessible to local people. This is not the experience of local people. Where is the evidence that this statement is correct?

As we have already noted, there is no diversity in employment in the area, which is not in alignment with Resilience Policy (JP-S 4), point 9 (main document, page 93). It is all industrial and warehousing, no digital, no technical, no green jobs, etc. Many such jobs are low paid and there is increasing automation. With this in mind, we do not consider it appropriate to displace and reduce the number of rural job opportunities in the area, which is what this development would do. There is no evidence in the documentation about the impact of this development on local rural businesses (the agricultural farmers, the stables/livery economy and their supply chains), this renders the Allocation not Justified. We believe this evidence should be provided to determine whether it is desirable to eliminate or diminish such employment opportunities when a huge area of industrial and warehousing sites already exists in this location.

In addition, the size of the development set out in the Allocation alone (including the brownfield sites that already have planning permission) will increase the population of the Bucklow St Martins Ward by 72%, but that figure increases to 90% when the other already approved developments (outside of the Allocation area, but within the Ward) are included. For St Marys Ward the figures are 29% and 32% respectively.

We believe that locating such a huge proportion of Trafford's housing and employment requirement in one small (and unsustainable) area is not Justified. As set out in the paragraphs below, there are alternative, more sustainable locations available in Trafford that would better meet the needs of Trafford residents. We believe the Allocation should be withdrawn and should be reviewed as part of Trafford's Local Plan, with consideration being given to significantly reducing the size and scale of the Allocation area and relocating planned development to smaller sites in more sustainable locations in Trafford. We have identified many such sites in our Alternative Land Supply list. This land included, for example, a number of car parks (not park and ride areas) which should not be needed if the aim is to stimulate modal change to sustainable transport options. We believe there are similar land supply options, which have not been given due consideration, all around GM.

FOCM Alternative Land Supply

We were interested to read (paragraph 11.327, page 365) that *"Careful consideration should be given to the design of the employment development to ensure that it is well connected and integrated with the surrounding residential development"* as, when we presented our Alternative Land Supply list to Trafford, we were given the following reasons as to why sustainable sites in the urban area could not be included:

- *"Housing adjacent to industrial uses has potential to cause amenity issues"* (this is certainly inconsistent with the approach being taken at Carrington where approval of significant levels of industrial and warehousing has resulted in the overdevelopment of the area and huge numbers of HGVs travelling on local roads, through a medieval village, rather than via sustainable options, and causing huge mental and physical health problems to residents)
- *"The site is occupied by a pub that is still operating"* (this is incorrect, this large public house, on a major transport route to Manchester, which has been closed for almost 2 years – demonstrating the importance of local knowledge), we understand a planning application has just been received for this site (105786/FUL/21) to create a care home and a fully accessible, adaptable apartment scheme



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- *“This site is within the Broadheath Industrial Area. Core Strategy, Policy W1 Economy states that employment uses will be focused in Broadheath and Broadheath will be retained and supported as a principal employment location, this employment allocation is being retained in the new Local Plan”* (so why isn't the remaining industrial and warehousing planned for New Carrington being proposed for this location, there are a number of empty and dilapidated units, an eyesore opposite new residential apartments, we do believe there is scope on this side of the canal for more dwellings rather than retaining this whole area as an employment site).

Whilst Trafford did agree to include some of the sites we identified on the SHLAA, others were rejected for reasons that we find very inconsistent with the plan to release 169 hectares of green belt on the second largest peat moss in GM, some examples are set out below:

- We identified a number of offices that are not currently let – these could be potential windfall/permitted development opportunities for conversion to housing – we disagreed with the reason given (*“the site is in a current employment use and is therefore not suitable for inclusion in the SHLAA”*), but in any event, we do not understand why, when there is so much land that may potentially come forward as windfall/PDR in the next few years, an estimate has not been made for such sites in the housing and employment land supply figures
- A school highlighted that they wished to sell a plot of their land to raise funds and had developers interested, but planning permission has been denied on the basis that the land is in the green belt – this land is in the school grounds, in a very sustainable area, so we are at a loss why green belt in an unsustainable location like New Carrington can be released, yet in a desirable location, such as at this school, the land cannot be redesignated and approved
- Another similar site has a demolished care home in its grounds, yet, cannot be added to the land supply list because the site is within green belt, this is, once again, a small site in a sustainable location, unlike New Carrington, so it is inconsistent to refuse to redesignate the land.

We believe our approach demonstrates the value of local resident input to the brownfield register and land supply list and would like to see this Allocation withdrawn from the Plan to enable a comprehensive review to be undertaken, in collaboration with residents, to determine whether green belt release is Justified. It is clear that all the alternative land available has not been fully explored and, with that in mind, we believe the release of the green belt is premature.

Affordable Housing

Given Trafford's acute affordable housing need (paragraph 11.326, page 365), the document should clarify how the 15% affordable housing is expected to be delivered (paragraph 7, page 359) across the Allocation portfolio (in the green belt and protected open land sites). This should exclude the housing that has already been given planning permission because the affordability numbers for those sites will have been agreed, although it should be noted that the marketing brochures for these sites do not indicate affordable housing is available.

Amenities and School Places

We do not understand how providing a new local shopping centre within the East Partington area to *“serve the needs of the proposed communities”* (paragraph 21, page 360) will improve the sustainability of the wider Partington and Carrington areas. We believe it will be damaging for the existing shopping facilities and will create a 'them and us' experience, especially as paragraph 11.336 (page 367) suggests that this new local centre will *“service the needs of the new community”*.

The Policy is also not Consistent with National Policies because there is no evidence that it will meet the requirement of the NPPF, paragraph 95 (page 28) which outlines the importance of sufficient choice of school places for both existing and new communities. It is not enough to acknowledge (paragraph 9.26, page 184) that the Policy needs to ensure *“that there are sufficient school places in the right locations and at the right times to meet the needs of existing and new residents.”* The Policy needs to demonstrate that this Plan, as currently proposed, is compliant (not only with the NPPF, but also with Objective 9 of this Plan (page 43).



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Paragraph 11.337 (page 367) recognises that the site will generate an additional demand for school places and paragraph 11.325 (page 365) confirms that the site will primarily deliver family housing. Yet, our FOI request suggests that Trafford's Education Department has estimated that 33% of the housing will have just one bedroom. We believe this has led to an underestimate of the required school places, which renders the Allocation not Positively Prepared.

We are also aware that Trafford's Executive highlighted the unprecedented demand for school places in the District at the [Executive Committee meeting on 27th September 2021](#). This raises numerous concerns and, with this in mind, we believe the number of school and nursery places should be clarified in relation to the existing residents, those that will move into the homes that already have planning approval (which includes some homes that have approval in Partington and Sale West but are outside of this Allocation area) and those that will be needed for the homes within this Allocation. This should be included within the evidence base provided to support decision-making in relation to this Allocation. As school places are a critical element of need, this Allocation should be withdrawn until clarity about the number of school places, and how they will be delivered, is available.

In addition, we believe the lack of primary, secondary and nursery school places in the Allocation area, and the lack of appropriate public transport services, will lead to parents having to drive their children to schools elsewhere, not a feature of a sustainable community.

There are similar problems with the lack of health facilities in the area (paragraph 24, page 360), which again will see families having to drive elsewhere to access health services.

Recreation and Health

We do not understand why document 07.01.20 (Stage 2 GM Green Belt Study - Beneficial Use - Appendix I – Trafford) only mentions Sale Sharks Rugby Club in relation to sport and recreation (page 12). The Allocation area also includes Sale Rugby Football Club and Manchester United's training grounds. The area is also used extensively for horse riding, walking and cycling, with the Transpennine Trail/Sustrans Route 62 running right through the Allocation area. The document (07.01.20, page 13) confirms our assessment (set out in our response to Q31) that there are *"relatively few areas identified as OS Open Green Spaces and therefore likely to be accessible to the public within both the retained Green Belt and 2km from GM allocation 45"* (the previous Allocation reference).

The release of green belt will result in the loss of significant sport and recreation opportunities. It will not enhance the lives of residents in the Allocation area (main document, paragraph 9.1, page 174) or users, when they are no longer able to walk, cycle or horse ride across the mosslands with ease. Existing routes will be fractured by the planned construction of houses, employment space and roads. Participating in such activities next to highly polluting major new roads will not only be unhealthy, it will be dangerous.

It should be noted that there are over 1,000 horses stabled in the area and, not only will their owners and riders activities be severely constrained as a consequence of these plans, but the stabling and livery services, along with the local supply chains of these rural businesses, will be significantly impacted.

Many sporting and recreational activities in the Allocation area are focused on children and young people. The severe impact of increases to air and noise pollution that will be a consequence of unnecessary development in this area will affect many of those participants, some of whom may suffer very serious health outcomes. It should be noted that there will be a considerable impact on health and wellbeing during the construction phase as well as once the development is complete.

Given the benefits of physical activity (paragraph 9.36, page 188) and the goal to positively change the lives of GM residents through physical activity and sports (9.34, page 187), more weight needs to be given to the impact of development on existing sport and recreation facilities. In particular, evidence should be included for each Allocation to demonstrate that there will be no impact on



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existing sportsmen and women from the increased air and noise pollution that will arise during and following development.

Site Selection

As we state in elsewhere in our response, we believe the site selection process was flawed because it only seems to have considered sites in the green belt, not sites in more sustainable locations in urban areas. Given the elapsed time since the original selection, the declarations of a climate emergency and the potential impacts of Brexit and the pandemic, the site selection process should have been revisited prior to this final iteration of the Plan.

When considering the New Carrington Allocation, it seems much of the documentation is misleading to the extreme. The table at page 111 of document 07.01.25, setting out the justification for the release of green belt at New Carrington is just one example.

Justification	Response
The site meets Criterion 2 of the Site Selection criteria, as the area is close to Port Salford which has been identified as a key asset in Greater Manchester	There is no definition in the Plan about the proximity that is considered to be close to Port Salford (New Carrington is only close as the crow flies and without a bridge across the Manchester Ship Canal cannot be considered to be “close”). Furthermore, there are no proposals set out in the Allocation to utilise the Manchester Ship Canal to reduce road freight. In addition, figure 1.1 in the New Carrington Masterplan does not show Port Salford on the map and that document does not mention Port Salford at all.
The site meets Criterion 3 of the Site Selection criteria, as the Carrington site is identified as a strategically important location in the GMSF which has the capacity to deliver transformational change.	It is odd that a location in the South of the region is considered to be “strategically important” given the aim to increase the competitiveness of the North. The brownfield developments within this Allocation have already been given planning approval so their transformation is being managed outside the auspices of this Plan. In addition, this development will not bring about the transformational change desired by local residents (which is for Carrington Moss to become a carbon and biodiversity bank). In addition, as mentioned below, New Carrington is not considered to be a Key Location (Policy JP-J 1, point G, page 110), nor is it on the Strategic Locations map (figure 6.1, page 112).
The site meets Criterion 5 of the Site Selection criteria, as residential and employment development will have a significant regenerative impact on existing communities in Partington, Carrington and Sale West.	We disagree, Trafford has been aspiring to regenerate Carrington, Partington and Sale West since the 2006 UDP (it is also mentioned in the 2012 Core Strategy), yet this Allocation does not propose diversity of employment types (it is all industry and warehousing), it removes local rural employment and introduces division by developing ‘us and them’ communities.

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Justification	Response
<p>The site meets Criterion 6 of the Site Selection criteria, as the scale of the development potential in this area will bring new public transport links and improve the viability of community services and facilities in the area.</p>	<p>This is particularly disingenuous as there are no plans to introduce trams or trains to the area (despite the presence of a former railway line that goes right to the heart of Carrington). There are no commitments to increased bus services (we have confirmed this via an FOI request).</p>
<p>The site meets Criterion 7 of the Site Selection, as the large number of new homes that can be supplied allows the creation of a new sustainable community that has the space to meet the range of family housing needs identified locally.</p>	<p>New Carrington will not become a sustainable community given the only transport commitment in the Plan is to a new road (across a peat moss), and, as mentioned above, there is no diversity of employment types in the area. There will also be challenges with access to school places and health services locally. In addition, the New Carrington Topic Paper (page 79) confirms that Trafford has an acute affordable housing need, yet this Allocation will only provide 15% affordable homes (and there is no evidence demonstrating how, when and where that affordable housing is expected to be delivered).</p>
<p>The allocation seeks to build upon the existing Carrington strategic location identified in the Trafford Core Strategy. A significant proportion of the area is brownfield land, outside of the Green Belt, which was previously in an industrial use.</p>	<p>New Carrington is not identified as a Key Location (Policy JP-J 1, point G, page 110), nor is it on the Strategic Locations map (figure 6.1, page 112). In addition, no action has been taken to improve Carrington as a strategic location since the production of the Core Strategy (2012), except to continue to approve a significant number of HGV-focused businesses next to a medieval village causing both physical and mental health issues for residents. In addition, the brownfield land has already been approved and construction is underway. The only part of the Allocation area that is relevant to the Plan is the green belt and protected open land.</p>
<p>An opportunity to create employment opportunities close to significant residential uses in an area otherwise constrained by a number of COMAH zones relating to existing industrial uses.</p>	<p>Please see our response to Policy JP-S 4 Resilience, the Allocation area contains a number of hazardous installations and there are several more in very close proximity. Some of these businesses are assessed by the HSE as in the Upper Tier of hazard, so to increase the population (of both residents and employees) in an area that may have to be evacuated in the event of an incident, a disaster or an emergency arising, is irresponsible, reckless and negligent. As mentioned above, the only employment opportunities being considered for this area are industrial and warehousing, which will bring yet more HGVs, further affecting the mental and physical health of residents.</p>

As the Allocation does not comply with Criterion 1 or Criterion 4, it is our view that this Allocation does not meet any of the criteria for site selection,



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Case for Exceptional Circumstances

The Case for Exceptional Circumstances goes on to consider (2, page 111) the Harm impact from the Allocation on the NPPF green belt purposes. This confirms that the land *“makes either a relatively significant or a significant contribution to checking urban sprawl (Purpose 1) and safeguarding the countryside from encroachment (Purpose 3). Land in the east also makes either a relatively significant or significant contribution in terms of maintaining a gap between Carrington and Sale, with land in the west making a lesser contribution (Purpose 2)”*. We believe the green belt in this Allocation area also provides the essential function of maintaining the identities of the different communities. The proposed development will result in perceived merging of the towns and villages because, together, the roads, housing and employment construction will eliminate much of the existing green space.

Whilst this is highlighted to some degree at point 3 (page 111), we do not believe the construction of 4 major new roads (including a dual carriageway) has been considered when creating the addendum report. We believe the construction of these roads will result in the total loss of perceived separation between the settlements, especially given that much of the retained green belt land is taken up by businesses. The function of the green belt in this area will be totally lost.

In addition, we do not think the changes made between 2019 and 2020 can be considered to be a *“large number”*. This statement is rather misleading. The changes reflect a reduction in green belt take of 71 hectares. Whilst we welcome the reduction, it should be recognised that this figure is not even as much as the land that is taken up by the businesses in the retained green belt gap (and much more of that *“wider gap between Carrington and Sale”* will be eaten up by those roads mentioned above)!

It is interesting that paragraph 11.338 (main document, page 367) discusses the removal of *“some”* land from green belt but does not indicate how much. Why is this figure not included in the Allocation summary sections? Whilst we recognise there is a balance to be struck, it seems rather deceitful to articulate the overstated benefits of growth but minimise the impact of the green belt take. This cannot be described as Positively Prepared.

It is clear from previous consultations that this disingenuous approach has affected the responses received (see our comments elsewhere in our response). The summary within the main document emphasises the benefits of the brownfield developments but not the impact on:

- the green belt, how much land is to be removed and what the outcome will be for the green belt purposes
- natural capital value
- important ecological and biodiversity assets
- the ecosystem services (including what level of ecosystem services will be impacted and how that will affect the mitigation of climate change, the capture of surface water to prevent local flooding or the populations of endangered species, for example)
- rural businesses and the jobs or services that will be impacted.

We believe the documents should provide a clear indication of the value of what is being lost (including Natural Capital Value) as well as the value of what is being proposed. This should be completed in an objective, factual manner.

This biased approach is also the case for the summary of ‘Exceptional Circumstances’, which does not include any reference to the losses mentioned above. With these losses in mind, we believe the Harm impact to the green belt (including the green belt adjacent to that proposed for release) will be substantial.

In addition, we believe the roads will cause any boundaries (07.01.25, point 4, page 111) to be ineffective, as they will fracture and permeate any perceived separation. It should also be noted



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that the Allocation area will also be impacted by the planned HS2 Golborne Link, which is not mentioned here.

The mitigation points (5, page 111) do not highlight that the retained green belt will be fractured by 4 major roads, nor that they contain a number of businesses, which, together, will make much the area totally inaccessible to the general public. In addition, it is now recognised that planting woodland on peat moss is inappropriate, so new woodland habitats may not be possible in much of the area. Any walking, cycling or horse riding routes next to major roads will be unhealthy and potentially dangerous.

We have set out, in our responses to Q44, Q45 and Q46, why we believe the release of green belt and protected open land is unnecessary and premature. With this in mind, we believe this Allocation should be withdrawn and, if it is determined, through the Local Plan process, that additional sites are needed, the site selection process should be revisited.

In addition, we would like to see the current limited focus on our environmental heritage extended, particularly in view of the commitment to update the existing records (paragraph 9.12, page 179), as recommended in the Historic Environment Background Paper 2020. The importance of conserving and protecting the Deer Park at Warburton and the Rides at Carrington Moss, for example, cannot be over emphasised. These, and other similar, environmental heritage assets also contribute significantly to GM's sense of place and distinctive identity (page 179) and should specifically be protected from harm, both within this document and in Local Plans.

Each Allocation should have a very visible summary of their Heritage Assets. Within this Plan, that summary is rather hidden within document 08.01.01 (Historic Environment Assessment Screening Report 2019). Table 3.1 (page 6) of that report reveals that the New Carrington site was assessed at Red, meaning it was highlighted for concerns over the impact on designated and non-designated heritage assets, which have the potential to be of high significance. The sites in this category are of the highest priority for further work.

We would like to see a summary of all the Allocation information, which clearly sets out what will be lost, as well as what will be delivered (including, for example, these heritage assets, the impact on rural businesses, the effect of the development on the current traffic free routes, the openness and landscape views, the impact on the natural capital benefits and ecosystem services). The current documents focus on the housing and employment units to be provided rather than giving a balanced review to support the decision-making process, when considering whether to seek alternatives to releasing green belt.

Community Engagement

We raise in our response to Q123 our concerns about the lack of compliance with the Gunning Principles and the District Statements of Community Involvement. The documentation gives us no confidence that the approach taken to date is going to change. There is no indication about how the community is going to be involved in the development of the masterplan for the area, for example. Paragraph 11.321 (page 364) suggests that the Council will work with stakeholders but the masterplan makes it clear (page 4 and page 14) that the list of key stakeholders does not include the community, either Parish Councils nor other resident representatives.

Furthermore, given that, where the transport implications of the Allocations require new major roads to be constructed, these will severely impact the health and wellbeing of local residents and wildlife. Such major affects should mean that the highest standards of consultation are implemented in advance of decisions being taken. This has not been the case to date in relation to this Allocation. There has been no meaningful engagement with residents throughout the six plus years of preparation. No workshops (even with those who will be directly impacted), very little communication or information sharing and no inclusion in the design process.

Let's be clear, providing residents with 150+ documents to read, assimilate and comment on may be the minimum requirements of the planning process but cannot, in any way, be considered to be



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genuine consultation or engagement. Many of GM's most vulnerable residents have been totally excluded from this process because it is not accessible to them or because it presents an overwhelming challenge to respond.

It is heartening to read that the main document considers that "*Residents should be able to actively contribute to decisions about places that will effect them*" (paragraph 9.2, page 174), and that (point B, page 177) there is a desire to enable everyone to participate equally and independently.

We believe that high levels of genuine societal participation (paragraph 9.9, page 175) should have been a requirement of this Plan process, particularly in relation to the Allocations that require the release of green belt, and especially so given the feedback from previous consultations. As an example, in relation to this Allocation, the Friends of Carrington Moss has repeatedly requested greater involvement, workshops and other means of engagement in the design process, without success. In fact, we highlight below the workshops **we** arranged, in which LA and landowner/developer representatives participated. Sadly, we have not been invited to attend any workshops arranged by others as part of the masterplan process.

Citizens are a largely untapped, free, talent pool and, with this in mind, we do not believe this Allocation is Positively Prepared or Justified. We request that it is withdrawn from this Plan and handled through the Local Plan process to enable genuine consultation with residents, who can bring huge benefits in terms of local knowledge, specific expertise and a wealth of ideas to the table.

As a resident group, focused on retaining, preserving and restoring Carrington Moss, we have delivered a very positive campaign, with the aim of collaborating with Parish Councils, the Local Authority, landowners, developers and other interested parties. We have to report that, other than the initiatives led by residents and Parish Councils, we have been totally excluded from the process. Neither ourselves, nor Parish Councils have been invited to the table to discuss the plans for this area. We were not even able to see the New Carrington Masterplan until it was released in October 2020.

We have worked extensively with local experts, including Cheshire Wildlife Trust, Lancashire Wildlife Trust and others with specialist skills to develop an Alternative Transformation Strategy for Carrington Moss. This would see the area become a carbon and biodiversity bank, providing income for landowners, an area of nature recovery, with genuine enhancements to biodiversity and ecology and benefits for all stakeholders. You can see our short video explaining our proposal at this link <https://www.youtube.com/watch?v=cLOmqKvNB0U>. We would like to see this Allocation withdrawn from the Plan and our Alternative Proposal discussed as part of the Local Plan consultations. One of the local groups of experts is Trafford Wildlife and they have been helping to see this strategy become a reality by starting the process of creating additional habitats for endangered species in approved locations on Carrington Moss (<https://www.trafford-wildlife.co.uk/habitat-sites/willow-tit-habitat-project>). We would, of course, like to see this initiative extended to other parts of the moss as soon as possible.

In addition, in the absence of being invited to the table, the Friends of Carrington Moss have designed and delivered 3 workshops to consider the future of our area, these covered:

- Ecology and biodiversity (face to face – hosted by developer, Himor)
- Interconnected Traffic Free Routes across Carrington Moss (face to face – hosted by landowner, Manchester United)
- Air Quality (online due to Covid restrictions)

Each of these workshops were attended by around 40 people, including landowners and developers, Trafford Council, specialist groups and individuals with specific expertise. You will find further information about these workshops, who participated and what was discussed on our website at the following links:



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<https://friendsofcarringtonmoss.com/2020/02/21/inputting-to-the-development-of-the-master-plan-for-our-area/>

<https://friendsofcarringtonmoss.com/2020/04/23/residents-and-local-experts-deliver-added-value-in-master-plan-workshops/>

<https://friendsofcarringtonmoss.com/air-quality/>

We believe these provide importance evidence that there is a wide range of talent in the community that can add real value in the process. With this in mind, we believe the Allocation should be withdrawn and further work should be undertaken to involve the community in the design of the future for their area.

It is noted that New Carrington, with planned development of 5,000 homes, 350,000 m² of employment space and the construction of 4 major roads, is not considered to be a Key Location or a Strategic Location (main document, page 110 and 112 respectively). It should, therefore, be easy to withdraw this Allocation from the Plan, for the reasons mentioned above.

Compliance with Plan Objectives

As set out above, and in our response to Q31, we believe this Allocation is not compliant with a number of the Objectives in this P4E Plan, nor is it compliant with the following P4E Policies:

- JP-Strat 13 (Strategic Green Infrastructure)
- JP-Strat 14 (A Sustainable and Integrated Transport Network)
- JP-S1 (Sustainable Development)
- JP-S2 (Carbon and Energy)
- JP-S4 (Resilience)
- JP-S5 (Flood Risk and the Water Environment)
- JP-S6 (Clean Air)
- JP-G1 (Valuing Important Landscapes)
- JP-G2 (Green Infrastructure Network)
- JP-G4 (Lowland Wetlands and Mosslands)
- JP-G7 (Trees and Woodlands)
- JP-G9 (A Net Enhancement of Biodiversity and Geodiversity)
- JP-P1 (Sustainable Places)
- JP-P2 (Heritage)
- JP-P5 (Education, Skills and Knowledge)
- JP-P6 (Health)
- JP-P7 (Sport and Recreation)
- JP-C1 (An Integrated Network)
- JP-C3 (Our Public Transport)
- JP-C4 (Streets for All)
- JP-C5 (Walking and Cycling Network)
- JP-C6 (Freight and Logistics)

In addition, it is not compliant with a number of Local, Regional and National Strategies and Policies, for example:

- Trafford's Declaration of a Climate Emergency



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- Trafford's Carbon Neutral Action Plan
- GM 5 Year Environment Plan
- GM Transport Strategy 2040
- GM Tree and Woodland Strategy
- Defra's Safeguarding our Soils: A Strategy for England
- England Peat Action Plan
- Government's 25 year Environment Plan

In addition, for the reasons set out in the paragraphs above, this Allocation does not comply with a number of clauses within the NPPF, including (for example):

- paragraph 16, page 8
- paragraph 22, page 9
- paragraph 84, page 23
- paragraph 92, page 27
- paragraph 93, page 27
- paragraph 104, page 30
- paragraph 105, page 30
- paragraph 140, page 41
- paragraph 141, page 42
- paragraph 153, page 45
- paragraph 174, page 50
- paragraph 179, page 51
- paragraph 189, page 55

Furthermore, given the requirement to extract or pile the peat on the site of these developments, this Allocation does not comply with the spirit of the following paragraphs in the NPPF:

- paragraph 210 (a), page 59
- paragraph 211 (d), page 60.

Finally, the KPIs set out at page 392 of the document should be extended to include all Allocations within the Plan and should measure their compliance with the Policies set out within the Plan. We note that document 09.01.02 (GM Transport Strategy Our Five Year Delivery Plan 2021-2026) suggests (paragraph 5.1, page 319) that the Council and TfGM will work together to develop a monitoring framework. The community should be involved in those discussions to ensure the outcomes meet their needs. The key indicators should be included within this Plan. Appendix C, 2040 Transport Strategy KPIs (same document, page 342) does not include any Allocation KPIs.

Modification:

We propose that the New Carrington Policy is withdrawn from the Places for Everyone Plan as it is not Positively Prepared, nor is it Justified or Effective and it is not Consistent with National Policy. We believe the release of green belt in GM is unnecessary and premature. Alternative options for housing, employment and roads have not been considered. The advice of Natural England appears to have been ignored. The local community has not been engaged or consulted effectively.



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We strongly believe that Carrington Moss should be protected, restored and enhanced to provide a nature-based solution to support the reduction in carbon emissions and the resulting air pollution and to provide the other ecosystem and natural capital benefits outlined elsewhere in our response. This alternative proposal should be included in the next iteration of Trafford's Local Plan.

We believe this Allocation can be strengthened and made sound by including the following commitments:

- a detailed review and update of the documentation to ensure it accurately reflects the developments within the Allocation (and should not include those that already have planning approval)
- a clear indication within the document of how all aspects of the development will be delivered, including, for example, the accessibility of the remaining green corridor, the protection of remaining green spaces from the air, noise and light pollution that will follow the construction, and how the quality of the green infrastructure will be measured
- confirmation of the intended timing and approach by which such improvements to the green infrastructure will be delivered
- given the plans to construct four major new roads across the mosslands, the document should set out how the ecosystem services benefits, mentioned throughout the Allocation, will be delivered
- provision of more detail to enable communities to understand how the existing woodlands will be impacted and the intended solutions to mitigate those losses and the expected air, noise and light pollution, particularly as the planned north/south tree belt will be fractured by roads, limiting its value and leaving wildlife in small, highly polluted, islands, which is not an effective solution for local biodiversity and ecology (it also may not be possible as it is now recognised that planting woodland on peat moss is inappropriate)
- redesignation of the protected open land as green belt to provide greater protection and a stronger, permanent boundary
- revisit the site selection process to ensure brownfield sites are prioritised and that the sites chosen actually comply with the selection criteria, and to ensure that those sites are in sustainable locations that do not add to the current transport challenges
- serious consideration should be given to alternatives to the Carrington Relief Road, particularly for freight traffic
- serious consideration should also be given to the provision of additional public transport services (not just infrastructure)
- the Transport Locality Assessments should be reproduced to demonstrate transparently (and without jargon) what the traffic implications of Allocation actually are, the information requested by the Friends of Carrington Moss and Carrington Parish Council should be provided as a priority:
 - current traffic figures relating to the Allocation area (separating HGVs from cars, and residents from employees)
 - increases in traffic from proposed developments already approved within the Allocation area (separating HGVs from cars, and residents from employees)
 - increases in traffic from the proposed developments within the Allocation (separating HGVs from cars, and residents from employees)
 - we would also need to understand what level of traffic has been considered from outside the Borough, in particular, the traffic using the Warburton Bridge, which is proposed for renovation and upgrade as mentioned below.
 - the traffic numbers that will accrue from the approved planning applications that are outside of the Allocation area, but within the Ward boundaries of Bucklow St Martins, St Marys Ward and Bowdon Ward, should also be provided as they will have a significant impact on Allocation traffic



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- the provision of an information showing how the estimated traffic numbers for the New Carrington Allocation relate to the % of new households in the area and the % of expected new workforce
- the provision of detailed carbon emissions data, including the carbon emissions expected as a consequence of land use changes
- the provision of baseline data, similar to that set out in document 09.01.04 (Transport Strategic Modelling Technical Note - Places for Everyone 2021), at Table 4.1, page 47 should be made available for each Allocation
- evidence should be provided that sets out the impact of this development on rural businesses in the Allocation area (the agricultural farmers, the stables/livery economy and their supply chains)
- provide data to support statements like that set out in the New Carrington Masterplan (Section 3.1, page 10) suggesting that thousands of new jobs, across a wide range of sectors and skill-levels, will be accessible to local people, demonstrating that such statements are based on substantiated evidence
- consideration should be given to significantly reducing the size and scale of the Allocation area and relocating planned development to smaller sites in more sustainable locations in Trafford
- local resident input to the design of the Allocation area should be sought through the Friends of Carrington Moss and the four local Parish Councils, together with other community groups in the area
- the brownfield register and land supply list should be updated in collaboration with residents and a comprehensive review of available land supply should be undertaken to determine whether green belt release is Justified
- provision of information to demonstrate how the 15% affordable housing will be delivered
- provision of clear information about the number of school and nursery places, in relation to the existing residents, those that will move into the homes that already have planning approval (which includes some homes that have approval in Partington and Sale West but are outside of this Allocation area) and those that will be needed for the homes within this Allocation – the Allocation should be withdrawn until clarity about the number of school places, and how they will be delivered, is available
- the green belt harm assessment should be revisited to incorporate the harm caused to green belt purposes by the proposed 4 major new roads and a further assessment should be made to consider the losses to heritage assets, the rural economy, natural capital value, important ecological and biodiversity assets and ecosystem services
- evidence should be included for each Allocation to demonstrate that there will be no impact on existing sportsmen and women from the increased air and noise pollution that will arise during and following development
- provide clear information about how the community will be involved in the ongoing development of the masterplan for the area
- incorporation of the FOCM Alternative Transformation Proposal (to create a carbon and biodiversity bank) within discussions about the future of the area
- the provision of clear information showing how the impact of the climate emergency has been assessed against this Allocation, including how the mitigation opportunities that currently existing (for example, the capture of surface water flooding) will be provided in the future, without impacting local residents and their homes
- a commitment to extending the KPIs, set out on page 392, to include all Allocations, to ensure those Allocations meet the requirements of the Policies within the Plan.



Friends of Carrington Moss

Places for Everyone Response

Q113 Policy JP-D 1 Infrastructure Implementation

Once again, this Policy does not highlight the importance of the climate emergency, the action plans are not mentioned as key documents at paragraph 12.2 (page 385). The aims to tackle climate change should be the prime influence on this Plan.

Residents are not mentioned as a key stakeholder at paragraph 12.3 (page 385). It is unreasonable that the people most affected by the delivery of the Plan are excluded from involvement in its implementation.

Point 7 of the Policy (page 386) should be amended to ensure that development does not lead to increased local flooding or air, noise or light pollution.

The KPIs at page 394 of the main document are weak in relation to the infrastructure implementation requirements and should particularly include monitoring to ensure there is no increased flood risk and no increased air pollution as a consequence of new developments.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- amend the wording in the Policy to stress that the aims to tackle climate change are the prime influence on this Plan
- amend the wording in the Policy to include residents as a key stakeholder within the implementation process
- amend the wording in the Policy (point 7, page 386) to ensure that development does not lead to increased local flooding or air, noise or light pollution
- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



Friends of Carrington Moss

Places for Everyone Response

Q114 Policy JP-D 2 Developer Contributions

The KPIs at page 394 of the main document are weak in relation to developer contribution requirements.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- withdrawal of any Allocation that is not aligned with this Policy
- the KPIs need to be updated to ensure they measure all aspects of this Policy.



Friends of Carrington Moss

Places for Everyone Response

Q121 Trafford Green Belt Additions

Given that parts of the New Carrington Area (Allocation JPA33) have been reviewed twice by Planning Inspectors and the protected open land at Warburton has been found to be unsuitable for development for a variety of reasons (in the Examination for the 2006 UDP document and, most recently, in PINS reference: APP/Q4245/W/19/3243720), we believe that Trafford should have taken the opportunity to redesignate this land as green belt, along with the other protected open land within the Allocation area.

Modification

We believe this policy can be strengthened and made sound by including the following commitments:

- include an additional Policy that redesignates the protected open land within the New Carrington Allocation (JPA33) area to green belt.



Friends of Carrington Moss

Places for Everyone Response

Q123 Supporting Evidence

123. Considering all the evidence presented in the supporting documents please respond to the questions below

Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

Duty to Cooperate (Document 01.01.02)

We believe that the plan is not compliant with the Duty to Cooperate for the reasons set out below:

With reference to the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 'Regulations) in relation to the Duty to Cooperate, we would specifically like to draw attention to paragraphs 7.23, 7.25, 7.26 and 7.27 of the Statement of Common Ground (dated August 2021). These paragraphs confirm that:

- (7.23) Stockport Council has requested confirmation about whether the nine districts are still willing to accommodate similar levels of Stockport Council's housing and employment need as indicated in previous iterations of the GMSF (it should be noted that paragraph 7.23 states that *"To the best of our knowledge, Stockport have not yet carried out an assessment of capacity to meet its own needs and have not indicated whether they have unmet need"* - we believe this statement to be incorrect as Stockport carried out this assessment and reported it to their Committee in mid July 2021).
- (7.25) It is pointed out that, at the time of the report, the nine districts do not have an evidenced understanding of what the Stockport land supply position is, and the assumptions underpinning Stockport's assessment of it.
- (7.26 and 7.27) The GMCA highlights the different timetable for Stockport's local plan and suggests that there will be future engagement between Stockport and the nine other districts regarding the *"proposed scale and distribution of development across Greater Manchester"*

We believe that the Statement of Common Ground raises serious concerns that the Plan is going ahead at this stage without sufficient clarity on the Duty to Cooperate with Stockport Council and the resulting impact on the robustness of the Plan. This is also contrary to NPPF guidance on securing cooperation and clarity about cross boundary issues. The Statement of Common Ground appears to suggest that the remaining 9 authorities may be willing to accommodate some of Stockport's housing and employment land needs within the Plan, but that the level of that need is as yet unspecified. It would also appear to indicate that, in reality, Stockport Council remains within the Plan area in all but name. We would assert that this means the Plan is not yet ready for consultation as Stockport's needs and their associated impacts have not been suitably considered.

Modification

On the basis of the evidence set out above, the plan should be withdrawn until Stockport's housing and employment need has been clarified.

Integrated Assessment GMSF Scoping Report 2021 (Document 02.01.01)

The Integrated Assessment GMSF Scoping Report 2021 (IA) document states, paragraph 1.2, page 9, that the purpose of the scoping report is to *"promote sustainable development, health and equality issues through better integration of social, environmental and economic considerations into the preparation of the GMSF"*. The IA report states (page 225) that *"This Scoping Report has been updated to ensure up-to-date information is being used to inform the IA framework of objectives and criteria; with this report providing the 2020 update"*, yet this report was issued on 9th July 2021.



Friends of Carrington Moss

Places for Everyone Response

The report further notes (page 225) *“that the declaration of climate emergencies by GMCA and the 10 local authorities, is the most significant shift since the previous update to the scoping report. The IA objectives and criteria, particularly related to climate emergency have been carefully considered and it is concluded that no additions or changes are required”*.

We totally disagree. The Climate Emergency Action Plans agreed by each district, following their declarations of a climate emergency, together with those of the Health Authorities and the GMCA, should have been an essential aspect of the IA, and should have been included as an input document, especially as it is acknowledged in the report (page 209) that *“Urgent actions are needed in the next 5 years”*. Furthermore, this document should have identified that an alternative to the existing Growth and Spatial Options was needed to address the declarations of a climate emergency and issues arising from Brexit and the pandemic. With this in mind, we do not believe all the reasonable alternatives for the Growth and Spatial Options have been documented or considered.

District Carbon Neutral Action Plans should also have been taken into consideration in this IA Report. Without inputs from these reports, we believe there are gaps in the key sustainability issues identified (A3, page 28), for example, [Trafford’s Carbon Neutral Action Plan, December 2020](#) includes actions in the following areas:

- Governance, Engagement and Collaboration
- Production and Consumption of Resources
- Transport and Travel
- Heat and Energy
- Natural Environment
- Skills and Green Growth
- Homes, Workplaces and Buildings.

Furthermore, Table 4 (page 36), which lists the documents that have been considered as part of this IA, includes a number of GM documents that are quite dated. We would have expected the IA to have had access to much more recent evidence and commentary (some documents are over 10 years old) and, whilst we recognise that the documents the IA considered may still be valid, we believe that GM should have taken the opportunity (since the inception of the GMSF in 2014) to commission a review and update the most important evidence being used to ensure the IA fully considers the potential impact on all its objectives of those declarations of a climate emergency.

We note that the date of Trafford’s declaration of a climate emergency is incorrect in the IA document (page 166), it should say November 2018. In addition, we understand Wigan Council declared a climate emergency in July 2019, so Table 45 in the IA is both incomplete and incorrect. There are also a number of graphics which did not appear to be there (eg Figure 1a page 19) and bookmarks that are not defined (eg page 214) in the document.

The document states, page 106, that across the UK *“up to 4,000 deaths are attributable to air pollution”*, yet a Government report issued in March 2019 (<https://www.gov.uk/government/news/public-health-england-publishes-air-pollution-evidence-review>) confirms that *“Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma”*.

Understating the issue of air pollution in this way will undoubtedly minimise the priority given to the impact of air pollution in some of the policies set out in this plan, particularly those which are inconsistent with the ambitions to move to a low carbon economy, to reduce car journeys by 50% and to prioritise development over nature recovery. The document should be updated for the most recent evidence available.



Friends of Carrington Moss

Places for Everyone Response

We also believe there are gaps in both the issues identified and the IA Objectives/Assessment Criteria.

In terms of the key issues identified in the IA:

- Section 5.3 Economy (page 202) does not mention the Rural Economy
- Section 5.4 Employment (page 202) does not mention the specific challenges for rural employers or employees
- Section 5.5 Health (page 203) does mention the impact of the Environment on health, but does not provide any linkage with development, particularly overdevelopment, construction of roads, the importance of public transport to health improvement
- Section 5.7 Deprivation (page 205) includes no link between deprivation and air pollution (the Government's Public Health briefing to promote active travel - May 2016, for example, points out that "Disadvantaged areas also tend to have a higher density of main roads, leading to poorer air quality, higher noise levels and higher collision rates". Health inequalities are further exacerbated because *"residents of deprived communities tend to travel less than the better off, but feel the impact of other people's travel. In short, increasing car dependency has led to increasing unfairness"* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf)
- Section 5.10 Air quality (page 207) mentions that a *"growing population and economy are likely to mean more people making more journeys, increasing air pollution without improvements in technology"* – public transport should also have been added to this statement
- Section 5.11 Biodiversity and geodiversity (page 207) does not mention that some biodiversity rich sites can be found on brownfield land
- Section 5.15 Flood risk (page 210) does not mention the surface water flooding that impacts many areas of GM
- Section 5.16 Land resources (page 210) does not mention that irreplaceable habitats, such as peat mosses and ancient woodlands, should be protected (alongside the best and most versatile agricultural land).

In terms of the Objectives identified in the document:

- Objective 2 (page 216) should have included Rural Employment within its Assessment Criteria, given that GM has 46.7 % green belt land, it should also have included reference to the protection of the best and most versatile agricultural land
- Objective 3 (page 216) should have included Equity of Access to public transport across GM within its Assessment Criteria, given that the GM Transport Strategy 2040 aims to decrease car journeys across GM by 50% by that date
- Objective 5 (page 217) should have included Equity of Access to green space across GM within its Assessment Criteria, given the Natural England 'Nature Nearby Accessible Natural Greenspace Guidance set out on page 163 of the report
- Objective 10 (page 218) mentions ten Air Quality Management Areas, yet Section 4.2.1 (page 143) states that a "new single Air Quality Management Area (AQMA) was designated on the 1st of May 2016, for the whole of Greater Manchester"
- Objective 11 (page 218) should have specifically mentioned the protection of irreplaceable habitats, such as peat mosses and ancient woodlands within its Assessment Criteria
- Objective 12 (page 219) should also have included 'Ensure no proposals set out within the GMSF/P4E exacerbate the ability of communities to mitigate the effects of climate change' within its Assessment Criteria, given that each district, each Health Authority and the GMCA have all declared a climate emergency
- Objective 15 (page 220) should have included 'Promote the use of natural solutions, such as restoration of peat mosses' within its Assessment Criteria.



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Places for Everyone Response

Most importantly, there is no Objective or Assessment Criteria that seeks to protect GM's Green Belt Land. Given that this is a key element within the NPPF, we believe this should have been included and suggest an Objective to 'Protect and maintain the openness and purposes of GM's Green Belt'. Such an Objective should be supported by Assessment Criteria that includes 'Will the GMSF: Protect and enhance GM's green belt land for the benefit of future generations of GM residents'.

Paragraph 2.1.2 of the IA (page 22) discusses the Equality Impact Assessment (EqIA), which is designed to ensure that discrimination does not occur in the drawing up of plans and policies. We believe the Places for Everyone document does discriminate against those communities whose health and wellbeing will be impacted by the decision to unnecessarily build on local green belt areas (see our evidence set out in our response to question 108). In addition, the outcome of the Plan will not result in equity of access to green belt and green spaces across GM, so some residents will be more unfairly treated than others. Furthermore, because the Employment Strategy does not ensure there is a diverse range of employment in all areas (see our evidence set out in our response to question 108), some residents (particularly our most vulnerable, and those who do not have a car) will be impacted more excessively than others.

It is noted that the document does include a very high-level overview of each district's current Development Plan and their 5 year housing supply.

We note that the Integrated Assessment GMSF Scoping Report 2021 (Document 02.01.01) paragraph on Affordable Housing (page 65) uses numbers from the 2019 GMCA Housing Topic Paper. These differ from the numbers in the main Plan document. Given this document is dated 9th July 2021, it would be expected to be updated and consistent. As stated elsewhere in this response, it makes the documents harder to review when there are inconsistencies in the numbers in the various supporting papers. The Empty Homes table (Table 20, page 68) uses a different dataset for the total number of dwellings to the number of households set out in Table 8 and Table 9 (page 49). Whilst it is recognised there are differences in the definitions, which explains the differences in these figures, the report is already a long and challenging read without such variety in the source data.

Paragraph 2.1.3, page 23, discusses the Health Impact Assessment (HIA), which aims to "*ensure that plans and policies minimise negative and maximise positive health impacts*".

It is strange, therefore, that more emphasis has not been included about the impact on the health of human and wildlife populations that arises from the increasing air, noise and light pollution that is created by this Plan.

Table 1, page 28, sets out the Scoping Stage Tasks, the first of which is to review "*relevant plans, programmes and strategies*", these are listed at Appendix A, page 226. The list of Regional Plans includes:

- Greater Manchester's Climate Change Implementation Plan (2012), page 289, which focuses on the transition to a low carbon economy
- Greater Manchester 5 year Environment Plan (2019), page 289, which outlines the aim to be carbon neutral by 2038 and articulates the 5 challenges incorporated within the plan (mitigation of climate change, air quality, production and consumption of resources, natural environment, and resilience and adaptation to the impacts of climate change)
- Greater Manchester's Low Emission Strategy (2016), page 290, which focuses on improvements to air quality and the reduction of carbon emissions
- Greater Manchester's Air Quality Action Plan (2016), page 290, which includes a clear, robust set of actions to tackle air quality issues
- Greater Manchester Climate Change and Low Emissions Implementation Plan (2016), which includes actions to address climate change and improve GM's air quality



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Places for Everyone Response

We would expect the focus of this Plan to be directed towards supporting the achievement of those regional plans, along with the others listed. Yet, as mentioned elsewhere in our response, this Plan continues to promote a Growth and Spatial Options approach that was developed before the climate emergency declarations were made.

We welcome the statement in document 02.01.01 highlighting (page 71) that *“The spatial distribution and density of housing developments is also an important factor in how residents will choose to travel. Locating housing in areas at low risk of flooding will help to ensure communities are resilient to future impacts of climate change. Certain locations should also consider other impacts associated with climate change, including increased incidence of extreme weather events such as increased temperatures and the urban heat island effect, which is likely to worsen some of the effects of air pollution”*. This statement should, however, have been extended to include mention of the importance of our peat moss lands, which can be restored to capture carbon and support climate mitigation actions.

The information about the number of primary and secondary school places (Document 02.01.01, Table 39, page 111 and Table 41 page 113) does not reflect the plan period. Given the large number of developments across GM, we would have expected to see the estimated impact of the Allocations and the other components in each Authority’s land supply, analysed by delivery schedule, to show demand for school places for each Authority in each year of the plan period. Without this data, it is impossible to understand whether the plan is sound from this perspective.

Similarly, there is no information about the impact of the plans on health and social care services. Whilst the IA report recognises the need for access to health services and the associated human capital, there is no evidence which demonstrates that there is a plan to achieve sufficient capacity, either in terms of buildings or resources. Hospitals, for example, take up significant land areas. The plan does not indicate how hospital capacity will be increased. We are already aware of people in acute pain waiting more than 5 hours for ambulance services and, of course, waiting lists have increased due to the impact of Covid. In addition, fire and police services are stretched, with GMP, in particular, acknowledging that they had not recorded over 80,000 crimes in one year (<https://www.bbc.co.uk/news/uk-england-manchester-55251366>).

Document 02.01.01 also mentions (page 143), that, for various reasons, the GM Air Quality Action Plan *“has not successfully reduced NO₂ pollution to meet the legal limits”*. The Air Quality Action Plan is now integrated within the GM Transport Strategy 2040. It goes on to say that the Action Plan identifies Key Priority Areas where air quality is poor. We mention elsewhere that the KPIs associated with the plan (page 392, main document) are weak, but the KPIs associated with Air Quality need particular attention. Suggested additional KPIs, specifically for Air Quality, include:

- The number of Key Priority Areas is not increased as a consequence of the Plan
- The number of Key Priority Areas is reduced as a consequence of actions set out in the Plan
- At least one Air Quality monitor is installed outside every school in GM by the end of the Plan period
- Car journeys of 2 km or less are reduced to less than 50% of all car journeys by 2040

Without these additional KPIs, there is a high risk that the plan will not be delivered in accordance with the Clean Air Policy and would, therefore, be undeliverable and unsound.

Document 02.01.01 recognises (page 151) that *“biodiversity has a role within the wider ecosystem, and a right to exist independently of the benefit it may offer to people and society”*. It goes on to set out some examples of the benefits that important habitats contribute to society and the economy, including food production, climate regulation and resilience, waste breakdown, cultural, social and health benefits. The document also highlights the importance of protection of biodiversity in relation to development and recognises the role such plans have to play in *“ensuring ecological networks do not become more fragmented”*.

The report should have set out, in an analysis of each Allocation, how each of these aspects perform in relation to that Allocation.



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Places for Everyone Response

Para 1.4, page 13, states that the IA will aid stakeholder engagement by providing consultees with a detailed understanding of the alternative policy options that have been considered during the development of the GMSF, and the reasons for selecting the preferred options. This has not been achieved!

Document 02.01.02 (Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020)) includes a lot of tables, but the actual assessment appears very lite-touch. The tables are very difficult to read because of the way they have been presented (with no headers at the top of the columns on each page, for example). There are a lot of cells with the same content within these tables.

On page 284 (Lowland Wetlands and Mosslands) References 12, 13 and 15 make no mention of the impact of the change of land use although at Reference 15 it does suggest that *“There is an increase in energy use and greenhouse gas emissions as development comes forward”*. This is despite Column 11 suggesting that specific sensitive receptors should be drawn out

Modification

On the basis of the evidence set out above, we believe the Integrated Assessment Report is not Positively Prepared and requires updating to include the Climate Emergency Action Plans and Carbon Neutral Action Plans for each of the 9 districts, together with those of the Health Authorities and the GMCA. The Assessment Criteria should be updated to reflect those Action Plans and the Plan should be assessed against these revised criteria. Without inputs from these reports, we believe there are gaps in the key sustainability issues identified.

We believe the gaps and inaccuracies in the identified issues and the Objectives/Assessment Criteria should be reviewed and updated, along with the evidence-base and the Plan should be assessed against these revised criteria, including the addition of an Objective to protect GM's Green Belt Land.

For the reasons set out above, we believe many aspects of these reports are incomplete and should be updated to specifically assess the issues we have highlighted in the paragraphs above.

Consultation Approach – Adherence to SCIs and Gunning Principles

We note that the Government is a signatory to the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters ("the Aarhus Convention"), which suggests that public bodies must recognise that adequate protection of the environment is essential to human well-being and basic human rights and that every person has the right to live in an environment adequate to his or her health and well-being. There is also a duty to protect and improve the environment for the benefit of present and future generations. To effectively deliver this, citizens must have access to information, be entitled to participate in decision-making and have access to justice in environmental matters, which will enhance the quality and the implementation of decisions, contribute to public awareness of environmental issues, give the public the opportunity to express its concerns and enable public authorities to take due account of such concerns, furthering the accountability of, and transparency in, decision-making.

With this in mind, and given the information contained elsewhere in our response, we do not believe the consultation approach for this Plan, particularly in relation to the Allocations, meets the requirements of the Aarhus Convention, nor has it followed either the District SCIs or the Gunning Principles. We will use Trafford's SCI as an example of our assertion.

The main document confirms (paragraphs 1.60 and 1.61, page 19) that four consultations have taken place. It is clear that the Growth and Spatial Options consultation, in particular, should have been repeated prior to this Regulation 19 consultation to allow a climate emergency focused option



Places for Everyone Response

to be included and to ensure that all current residents have the opportunity to participate. If a resident was a young person at the time of the initial consultations, or had not yet moved into GM, or indeed had no knowledge of the GMSF (the number of responses to the 2015 consultation suggests that the initiative did not reach many residents), then they have not had the opportunity to provide their views.

Document 03.05.01 (Statement of Consultation) sets out (page 721) the approach Trafford (for example) took to the 2019 consultation which did not include Stakeholder Workshops (SCI, 2015, page 16) and the drop-in events were not an opportunity to discuss or provide input to a variety of options for the Allocation area, they merely shared the proposed plans and gave information about how to respond to the consultation.

We attach a graphic showing the History of the GMSF from the New Carrington Allocation (JPA33) perspective. The graphic demonstrates the consistent lack of support for the plans to build on the green belt at this location, despite the disingenuous and misleading statements made as part of this process. The graphic also shows the very poor number of respondents in the 2014 and 2015 consultations and the pitiful number of respondents in relation to the New Carrington Allocation in 2016. These figures confirm the serious lack of genuine consultation channels used.

History of the GMSF/P4E



Current Consultation (2021) Regulation 19 – Soundness only

August 2014
All Local Planning Authorities in GM agreed to prepare GMSF

Scoping Survey receives a total of 94 responses

2015
Growth and Spatial Options Paper

Only 180 respondents in total (of 2.79m citizens)
- around 33 appeared to be from residents

First Iteration
2016 GMSF Responses

- 19,800 comments in total – concerns about green belt take was the single biggest issue raised
- Very limited consultation in Trafford – no local publicity about the impact, no involvement of Parish Councils
- New Carrington Allocation: Only 33 responses in total (22 individuals), over 66% disagreed with proposals. Of the 33% agreeing, many only agreed with development on brownfield areas

FOCM Founded
January 2017 following landowner signage on CM footpaths

Second Iteration
2019 GMSF Responses

- Consultation and publicity still inadequate
- 17,500 responses received in total
- New Carrington Allocation:
 - 867 responses
 - Over **83% disagreed/mostly disagreed**
 - Only 7.5% agreed or mostly agreed with the proposals

Many disingenuous statements, eg, the New Carrington location "enables the redevelopment of the extensive former Shell Carrington industrial estate" (note that the brownfield land has already had planning approval without the GMSF being complete). There was no focus on the planned release of **240 hectares** of green belt land for development on irreplaceable habitats!

3rd Iteration
2020 (No Consultation)

Stockport politicians voted to withdraw, the plan revised as

Places for Everyone (P4E)

- New Carrington Allocation

There was still no involvement of Parish Councils or other community representatives prior to the documentation being released in October 2020

Again, many disingenuous statements

The 2020 document stated that "Due to the existing condition and nature of habitats, hydrology and land available, large scale restoration of raised bog will not be possible" - **this is not the case!**

The document also suggested that public transport will be significantly improved – responses to our FOI requests suggest **this will not be the case!**

2021 FOCM Survey
Of 816 responses:
90.6% do not support the New Carrington Masterplan
94.4% support FOCM alternatives



We believe the consultation has been minimalist, rather than following the Gunning Principles. Given the size of the New Carrington Allocation (JPA33) and the expected impact on local communities (air, noise and light pollution, the impact on red listed birds and endangered wildlife and the potential for future flooding to name just a few concerns), the Gunning Principles should have been closely adhered to. We set out below, some of the reasons why we believe they have not been followed.

[Gunning confirms that consultation is only legitimate when the following four principles are met:](#)

- proposals are still at a formative stage (a final decision has not yet been made, or predetermined, by the decision-makers)
- the design of the New Carrington Allocation (JPA 33) has been agreed, in conjunction with developers, who are considered to be "major stakeholders" (New Carrington Masterplan, page 4), the inclusion of the release of significant areas of green belt and protected open land was proposed without any reference to, or input from, residents or community groups



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- local residents, whose lives and homes will be directly impacted by this Allocation, only discovered its existence because a landowner put up 'Trespassers will' signage on public rights of way, this demonstrates that the formative stage had passed prior to residents being informed and, in fact, Trafford only put up posters in the area surrounding the Allocation for the Regulation 19 consultation, the point in the process when residents, who have not previously been engaged, cannot hope to amend the proposals
- the brownfield land in Carrington has already received planning approval for significant increases in industrial and warehousing capacity and some housing, so much of development within the Allocation area is already under construction suggesting that this Allocation is way past the formative stage
- there is sufficient information to give 'intelligent consideration' (the information provided must relate to the consultation and must be available, accessible and easily interpretable for consultees to provide an informed response)
 - as set out in our responses to various questions in this consultation, there are huge gaps in the information that should be available, particularly to support decisions about the Allocations (projected carbon emission figures, clear traffic numbers, the natural capital values of the sites, for example)
 - as mentioned elsewhere in our response, on analysing the 2019 consultation responses (when the New Carrington proposal included the release of 240 hectares of green belt) we found that many respondents who suggested that they 'agreed' or 'mostly agreed' with the proposals included comments such as *"basically a brownfield area"*, *"appears minimum impact on green belt"*, *"can't see a flaw, doesn't seem to use green belt land"* *"agree because this is a redevelopment of an old industrial estate so not greenbelt land"*, demonstrating that the information in the documentation was not at all clear
 - there are a huge number of documents to read and assimilate, many of which are not easily interpretable and the process is not seen as accessible by many residents, there are far too many documents to consider simultaneously, without any other involvement in the process, many residents felt unwilling or unable to respond as a consequence (and responding to such a marathon task is out of reach for many of our most vulnerable citizens, young people or older residents)
- there is adequate time for consideration and response (there must be sufficient opportunity for consultees to participate in the consultation)
 - whilst the overall elapsed time given for this response was around 12 weeks (including the Committee report publication period), the sheer number of documents makes this an unreasonable timeframe, it should be remembered that residents (unlike Local Authority staff and developers) are not reviewing these documents full time, they are volunteering, using their own time and many have to pick up and put down documents repeatedly, fracturing concentration and flow of responses
 - in addition, many residents are suffering from the after-effects of Covid, including Long-Covid, which can make their ability to concentrate and participate challenging
 - furthermore, this consultation was published as school holidays began and some people have not been available for some of the period due to family commitments
 - for these reasons, we believe the period should have been extended
- 'conscientious consideration' must be given to the consultation responses before a decision is made (decision-makers should be able to provide evidence that they took consultation responses into account)
 - as we note in our blog of 23rd September 2021, (<https://friendsofcarringtonmoss.com/2021/09/23/what-does-traffords-latest-report-about-the-carrington-relief-road-crr-mean-for-affected-residents/>) residents raised a question with Trafford in March 2021 (*"Residents believe improvements can be made to the design of Option A, how can these be fed into the process? Our ideas for improvement would reduce the impact of land ownership issues and will significantly reduce traffic disruption during construction"*). Trafford has not addressed our repeated requests for the opportunity to input our ideas and has now



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produced a preferred route (taking the road across the peat moss), despite the inputs from Natural England mentioned in our response to Q108, which specifically stated that this route would be more environmentally damaging than Option A

- furthermore, in the same document sent to Trafford in March 2021, residents requested that the number one objective for the Carrington Relief Road should be protecting the health and wellbeing of existing residents. Not only did this request not make it to the top of the list, it is not included as an objective at all and residents have had no feedback from Trafford about their list of questions since the document was submitted
- [Trafford's Core Strategy](#) (2012) sets out the implementation plans for the then strategic location (Carrington), one of which (top of page 80) is the provision of a new crossing across the Manchester Ship Canal. There is no mention of this initiative in the New Carrington Policy, yet it is one solution local residents would like to see explored, given the huge issue of high volumes of HGVs that have resulted from Trafford's approval of overdevelopment in the area. At our request, we presented this alternative option to Salford and Trafford Officers in November 2020, yet it was not included in the options appraisal documentation that was presented to Trafford Executives in December 2020 and has been excluded from the New Carrington Policy. Other resident ideas to address the lack of sustainable transport options in the area have not been heard because, as mentioned above, Trafford has not responded to our repeated requests for a workshop to discuss them.
- we believe the plan continuation bias being displayed about the New Carrington Allocation and its component parts, including the Carrington Relief Road, demonstrates that conscientious consideration of consultation responses has not been given.

Based on the information above, we believe the New Carrington Allocation is a clear example of non-compliance with the Gunning Principles.

Turning to Trafford's Statement of Community Involvement (SCI), the first table below considers Trafford's 2015 SCI document:

SCI Content	Experience in the consultation
<p>Paragraph 1.5 (page 5) states that <i>“it is the Council's intention to promote effective public participation in the planning system. This will make sure that all sections of the community have the opportunity to be actively and continuously involved from the very start of the planning process both in the preparation and subsequent revision of development plans and in significant decisions on planning applications.”</i></p>	<p>The number of respondents to the Growth and Spatial Options Paper was pitiful and reinforces our request for this paper to be revisited (as set out in our response to question 59).</p> <p>The very low number of 2016 New Carrington Allocation responses demonstrate the lack of local action to raise awareness of the GMSF.</p> <p>The community were not widely notified until the Friends of Carrington Moss (FOCM) were formed in 2017.</p> <p>It should be noted that there has been no active or continuous involvement of local residents from Trafford. We were not even able to review the New Carrington Masterplan until the 2020 GMSF documents were released. We are aware that there have been discussions with developers and landowners (as set out in that document 10.09.06).</p>



Friends of Carrington Moss

Places for Everyone Response

SCI Content	Experience in the consultation
<p>1.6. (page 5) The aim is that by achieving greater community engagement throughout the planning process our stakeholders and other organisations will have an active involvement in identifying and addressing the main planning issues, and in the development of planning policies and proposals.</p>	<p>Residents have not been engaged in the process. This is evidenced in the attached letter to Trafford's Chief Executive dated 28th February 2020 (200228 Letter to TMBC CEO re CRR). The letter refers to the lack of consultation about the Carrington Relief Road, which is part of the New Carrington Allocation (JPA33). The options appraisal document which FOCM reviewed was full of errors, misleading statements and huge gaps in the information needed to assess the plan being proposed.</p>
<p>2.10 (page 9) The following groups will be consulted where appropriate:</p> <p>.....</p> <p>Local organisations - community and voluntary bodies with an interest in Greater Manchester.</p> <ul style="list-style-type: none"> • Landowners, developers and agents – those who have a direct interest in future development and have a major role to play in providing the facilities and services the district needs. • The general public - those who live in, work in or visit Greater Manchester as well as those who have expressed an interest in the subject matter. 	<p>Whilst landowners, developers and agents appear to have been engaged with extensively (New Carrington Masterplan page 4), with Trafford describing them as major stakeholders, community organisations, residents and the general public have not been involved in the development of this masterplan in any meaningful way. There have been no workshops and no interaction. It should be clear that circulating 150+ documents to be read, digested and commented on is not consultation or engagement, it merely ticks a box.</p> <p>Given the impact of this huge development on local communities, including their health and wellbeing, the Gunning Principles should have been closely adhered to.</p>
<p>Meetings: 2.46 (page 16) Where a specific issue is raised, consideration will be given to requests for meetings with groups, organisations, individuals, and communities.</p>	<p>Whilst we have welcomed the opportunity to have a number of meetings with Trafford since the publication of the New Carrington Master Plan in October 2020, we are still awaiting a significant amount of information (first requested many months ago), such as the data relating to traffic numbers.</p>
<p>Stakeholder Workshops: 2.47. (page 16) The Council has made extensive use of Stakeholder Workshops in the past to enable interested bodies to discuss planning issues in a detailed and supportive forum. This will continue in the future and will be particularly used at the early stages of plan preparation. A record will be kept of Stakeholder Workshop proceedings.</p>	<p>Despite the New Carrington development being the largest housing allocation in the GMSF/P4E, Trafford did not arrange any workshops to engage residents and community groups whilst the proposals were at a formative stage (Gunning, point 1). In addition, we have requested a number of workshops, most notably in relation to the Carrington Relief Road (see attached document 210308 Initial-Engagement-FOCM questions). Trafford has not responded to our repeated requests for information, responses and workshops.</p>



Friends of Carrington Moss

Places for Everyone Response

SCI Content	Experience in the consultation
<p>Meetings with Partnerships and Communities: 2.48. (page 16) The Council will inform and consult Town & Parish Councils, Neighbourhood Forums, Neighbourhood Partnerships, Town Centre Partnerships, Locality Partnerships, Ward Members and other groups on a regular basis during the production of Local Plan Documents.</p>	<p>Despite the size of the New Carrington Allocation (JPA 33), a minimalist approach has been taken, what is described by residents as a “tick-box” exercise, rather than genuine consultation. The only consultation about the Allocations has taken place as part of the GMSF/P4E, which has seen residents being having to download a huge number of documents. Unlike developers, residents have not been sitting round the table, working in collaboration on the design of the area that most affects them!</p>
<p>Hard to Reach Groups: 2.49 (page 17) The Council will make every effort to engage with these groups directly and/or through representative organisations, whether local or national, and encourage them to get involved in the preparation of Planning Documents. In Trafford, hard to reach groups are considered to be:</p> <ul style="list-style-type: none"> • Young People • Frail Elderly • People with disabilities - mobility impaired, visually impaired and hearing impaired • Black Minority and Ethnic Groups • Gypsies and Travellers and Travelling Showpeople 	<p>We do not believe sufficient effort has been made to engage with “hard to reach” residents. Young people will arguably be most affected by this Plan. Local Authorities and the GMCA should have made provision to visit schools to share the information and gather feedback about their views, especially given the length of time it has taken to progress the GMSF/P4E Plan.</p> <p>The huge amount of documentation has made it difficult for other “hard to reach” groups to access the information. One elderly lady, visiting her local library to review the documents, found the type too small and the documents inaccessible.</p>
<p>Monitoring: 4.1 (page 23) The success and effectiveness of the Statement of Community Involvement will be reviewed through the Authority Monitoring Report (AMR). This will ensure that the stakeholders whom the Council wishes to involve, and the techniques for community involvement engagement, remain appropriate and are achieving an effective and representative level of public involvement across all sectors.</p>	<p>Trafford cannot have reviewed the number of responses to the 2015 and 2016 consultation without recognising the issue of lack of appropriate consultation channels. A review of the 2019 responses, where those who suggested they agreed with the Allocation included comments such as “Basically a brown field area”, “Agree because this is a redevelopment of an old industrial estate so not greenbelt land” and “Can’t see a flaw. Doesn’t seem to use greenbelt land” must have signalled that their wording was either confusing or misleading (or both).</p>

Trafford Statement of Community Involvement – September 2020

<https://www.trafford.gov.uk/planning/strategic-planning/docs/Statement-of-Community-Involvement-Sep-2020.pdf>

Where our comments on specific clauses would be similar to those in the 2015 SCI, we have not repeated them.



Places for Everyone Response

SCI Content	Experience in the Consultation
<p>1.1 (page 3) The planning system in Trafford should be as transparent, accountable and socially inclusive as possible. There should be as many opportunities for successful and meaningful public participation as there can be. Trafford Council wants to have even more effective community involvement, providing opportunities for active participation and discussions with the community as early in the plan-making and planning application processes as possible.</p>	<p>We do not believe consultation about the planned New Carrington Allocation has been anything more than the absolute minimum that is required by the planning system. There have been no community workshops, no involvement of community representatives in the design of the Allocation and officers are unresponsive to resident emails! We do not believe it is either transparent, accountable or socially inclusive to exclude residents from access to the documentation until it is issued as part of a suite of 150 documents.</p> <p>It should be noted that residents do not feel actively and continuously involved (paragraph 1.4, page 3).</p>
<p>3.1 (page 10) The Council will carry out appropriate consultation during the preparation of plans and supporting documents</p>	<p>It is clear that there are different ideas about what is “appropriate consultation”. The Gunning Principles set out the minimum requirements and we do not believe these have been met for this Plan.</p>
<p>3.11 (page 11) Consideration will be given to requests for Virtual Stakeholder events with groups, organisations, individuals and communities, depending on the type of document and the stage reached in its production. The following types of events will be considered:</p> <ul style="list-style-type: none"> • Virtual Workshops • Working with Partnerships and Communities 	<p>Whilst meetings have been held with Trafford, FOCM has repeatedly requested (virtual) workshops to examine in detail information relating to various aspects of the New Carrington Allocation. These have not been forthcoming.</p>
<p>4.2 (page 13) Consultation on the GMSF is carried out on a joint basis and is in line with the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and the ten districts' Statements of Community Involvement. If</p>	<p>There has been no active engagement with residents in the design of the Allocation area, consultation has been kept to the bare minimum (such as allowing residents to comment on 150+ documents), we do not believe either the requirements of this SCI or the Gunning Principles have been met.</p>
<p>Appendix A (page 22) Consultation stages of Plan-making</p>	<p>There is no indication of any interactive working with the public, no suggestion of workshops and no reference to achieving the Gunning Principles.</p>

We believe the tables above demonstrate that the Statement of Community Involvement has not been followed in progressing this Plan.



Friends of Carrington Moss

Places for Everyone Response

Finally, the Friends of Carrington Moss has published a survey for members of the local community to complete. At the time of submission, 816 residents have responded. The survey asked the following questions:

- Have you seen Trafford's Masterplan for the area, which aims to develop 5,000 houses, 380,000 square metres of industrial and warehousing, along with the construction of 4 new major roads?
 - 79% of residents have seen Trafford's plans
- Do you support Trafford's plans as documented?
 - Only **4.8%** of residents support Trafford's plans
- Are you aware that the Friends of Carrington Moss are working with the Parish Councils and other Community groups with the aim of retaining our green belt?
 - 88.7% of residents are aware of FOCM's aims
- Do you support the aims of Friends of Carrington Moss to save our green belt for future generations of users, to support the climate emergency action plan and to improve irreplaceable habitats, encouraging the growth of bird and wildlife populations?
 - 94% of residents support our aims.

In addition, the Friends of Carrington Moss has secured over 1,500 signatures on a written petition objecting to roads (including the Carrington Relief Road) being built across the peat moss.

We feel this is a resounding call for an urgent review of the plans.

Furthermore, at a regional level, residents, as key stakeholders, have had limited involvement. In fact, in a letter to the Secretary of State (Robert Jenrick) on 23rd August 2019 (attached as evidence), the GMCA set out their engagement plan for the next iteration of the document. It is notable that the workshops with green belt groups (mentioned on pages 3, 5 and 6), did not take place. Whilst we recognise Covid may have disrupted some plans, the use of online meeting tools very quickly became the norm and could have been used to facilitate these workshops.

Overall, we believe consultation and engagement with residents has been very poor, particularly prior to the 2020 documentation release.



Friends of Carrington Moss

Places for Everyone Response

Attachments

Trafford's 2015 Statement of Community Involvement
190823 Letter from GMCA to Rt Hon Robert Jenrick (SoS)
200228 Letter to Trafford CEO re CRR
201130 FOI Response – Public Transport (TfGM)
210308 Initial Engagement – FOCM Questions
210322 FOI Response CRR, Natural England
210701 History of the GMSF
210811 CRR Petition Cover Page
210922 TfNH checklist-FOCM