



**Friends of Carrington Moss
Objection to Planning Application 100477/FUL/20**

28 Elmwood
Sale
M33 5RN
28th January 2022

Head of Planning & Development
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

Dear Sir/Madam

Objection to Planning Application 100477/FUL/20

Further to our previous objection, dated 11th May 2020, I am writing to confirm that, whilst we welcome the reduction in the number of properties on site, we remain opposed to this development for the reasons we set out previously.

In addition, there are a number of Policy conflicts including those highlighted in the enclosure to this objection.

We note that, once again, the new Bat Survey has been carried out at "*a time of year when bats are less active, and external signs of use are less likely to be present*"! Is this acceptable to Trafford?

In summary, this proposal does not meet Trafford's Core Strategy Policies and it includes factually incorrect and conflicting information. It does not satisfy the requirements of the NPPF, and, if approved, this development would be detrimental to the green belt area, will negatively impact the heritage asset on the site and will result in considerable, harmful changes to the surrounding environment, affecting the wildlife and bird species which have made Carrington Moss their home.

Please don't hesitate to contact me should need any clarification.

Kind regards
Marj Pownar
Chair
Friends of Carrington Moss



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Policy Conflicts:

1. This is a very isolated site, with little access to services or facilities and very limited public transport. As such the proposal for 12 dwellings conflicts with Policy L2.2 of the Core Strategy (CS), which states that:

"All new development will be required to be (amongst other things):

(b) Appropriately located in terms of access to existing community facilities and/or delivers complementary improvements to the social infrastructure (schools, health facilities, leisure and retail facilities) to ensure the sustainability of the development.

For the same reason, it would conflict with Policy L4.1(e), which states that the Council will ensure that, "as appropriate, development proposals within less sustainable locations throughout the Borough, will deliver, or significantly contribute towards the delivery of, measures to secure infrastructure and services that will improve access to more sustainable transport choices

2. This development, if approved, would have a significantly harmful impact on the character and appearance of the area, including its impact on the Grade II Listed Ackers Farmhouse. The area is currently typified by farm and farm-type buildings, along with stables and equestrian buildings, surrounded by largely open land. The proposed design would be totally out of character. In this respect it would conflict with policies on protecting the setting of Listed Buildings and also with Policy L2.2(c) which states that development should not be harmful to the character or amenity of the immediately surrounding area.
3. There is a well-established equestrian community here and in the wider locality, the loss of genuinely green jobs is highly undesirable, and the proposal would conflict with Policy W1.12 of the Core Strategy which states that:

"In determining applications for non-employment uses on unallocated employment sites, developers will be required to provide a statement to the satisfaction of the Local Planning Authority, demonstrating that:

- There is no need for the site to be retained for employment purposes and it is therefore redundant;
- There is a clear need for the proposed land use(s) in this locality;
- There are no suitable alternative sites, within the locality, to meet the identified need for the proposed development;
- The proposed redevelopment would not compromise the primary function of the locality or the operations of neighbouring users; and
- The proposed redevelopment is in accordance with other policies in the Development Plan for Trafford."

The proposal would clearly fail to meet these criteria.

4. The site is in Green Belt and it would represent inappropriate development, with no other considerations that would clearly outweigh the harm to the Green Belt. Whilst the applicant may contend that the site represents previously developed land, the proposal would be harmful to the openness of the Green Belt. The planned development would be highly visible and, as mentioned above, out of character. Moreover, there is no firm commitment to providing much needed affordable housing. In any event, the amount of affordable housing would be very small, and it would not outweigh the harm to the openness of the Green Belt.



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Finally, the claim by the applicant (in the Design and Access Statement) that the proposal would result in "a vast increase in Green Belt land" is somewhat hard to understand. The Green Belt boundary would not change, so the amount of Green Belt land would be exactly the same. The only impact that the proposal would have on the Green Belt would be a harmful effect on its openness.

5. The Statement of Community Involvement is inadequate for such a sensitive development in the Green Belt. It is, in fact, virtually non-existent, and does not appear to have any evidence of meaningful involvement with residents who will be impacted, and certainly not with the substantial element of the community involved in equestrian pursuits.
6. The proposal would result in a very small residual parcel of land being given over to "meadow". This residual parcel would be surrounded by a major road to the north, a football training ground to the south and west, and a rugby training ground to the east. It would clearly be of no practical use for any agricultural purposes, and this element of the plan for the site and its surroundings should be ignored in terms of having any practical value whatsoever. It will result in an area of waste land, with little or no biodiversity value, and which will almost certainly be followed with pressures to extend the housing development, causing further harm to the openness of the Green Belt.

For ease of reference, we repeat our previous objection below:

OBJECTION BASED ON IMPACT TO GREEN BELT

This development is proposed on green belt land, adjacent to Carrington Moss, which has demonstrated its huge benefits to local communities during the Covid 19 pandemic. Using this site as a riding stable is highly advantageous to the area, given the number of local horse riders and the benefits of their ability to exercise on the green space adjoining to the site. Building a number of residential properties is not!

The Design & Access Statement document states that the proposal is an opportunity to '*provide a vast increase in the amount of green belt areas*'. **This is factually incorrect.** There will be **NO** increase to green belt as a consequence of this development. In fact, these plans will change the nature of the green belt on this site and will significantly, and negatively, impact the surrounding green belt land. The importance of the green belt in this area can be determined by Trafford Council's own words, as set out in the current Development Plan. The proposal documentation acknowledges that for '*the purposes of this application the Development Plan in Trafford comprises the Trafford Core Strategy (2012) and the saved policies of the Revised Trafford Unitary Development Plan (UDP - 2006)*'. Trafford's Strategic Planning team will be aware that the 2006 UDP mentions the importance of green belt in this area. The '*Carrington Rides*' are designated as a '*Local Nature Conservation Site*' and a '*Special Landscape Feature*'. In addition, the '*protection and enhancement of the mossland as a carbon sink to mitigate the effects of climate change*' and '*the protection and enhancement of the sites of nature conservation and biological importance, including the Carrington Rides*' are objectives set out in Trafford Core Strategy 2012. Furthermore, Trafford's Landscape Strategy of 2004 mentions the unique characteristics of the Carrington mosslands and that the Carrington Rides will be '*conserved, enhanced and strengthened*', confirming that the site is an important area of ecological value, with the '*open aspect and views, which extend into the adjacent areas*' being '*important characteristics of the area*'.



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In addition, the National Planning Policy Framework (NPPF) promotes the continued protection of the Green Belt to check the unrestricted sprawl of large built up areas, to prevent neighbouring towns merging into one another and to assist in safeguarding the countryside from encroachment. The documentation states that the '*proposed development will also alter the general character and land use of the application site, from an equestrian centre to a residential use*'. This is inconsistent with the NPPF purpose of the green belt.

In terms of the character of the local area, the document states that '*the immediate area is largely defined by the built form of the Sale Sharks training ground [most of which is pitches], the equestrian centre and the residential development at Ackers Farm*'. Disingenuously, there is no mention of the much larger area surrounding and adjacent to the proposed development, ie Carrington Moss! We have already set out above how this area has been described by Trafford Council.

Whilst the NPPF permits redevelopment of existing buildings within the green belt, in special circumstances, we totally disagree that this development will satisfy the obligations set out in paragraph 145(g) of the NPPF, which requires that the development **MUST** 'contribute to meeting an identified affordable housing need within the area of the local planning authority'. The Application Form clearly states that **ALL** the housing will be **Market Housing**. There is **NO** commitment within the application to meet Trafford's requirement for 40% affordable housing – see below Objection Based on Lack of Commitment to Affordable Housing.

Whilst we recognise that this small development will not, in itself, merge the townships of Sale and Carrington, we do, however, dispute the claim that '*the proposal would not cause or contribute to the merging of any towns*'. In creating an isolated residential community, right in the middle of green belt land, future new developments will be encouraged to reduce the isolation of the families living here, to address the lack of access to public services and, therefore, to eradicate even more of our precious green belt land, degrading the biodiversity of the whole area.

Approving a residential development in this location is not sustainable and, to secure the services expected by residents (including improved public transport links and mains drainage, rather than the use of septic tanks), it is likely to result in further proposals to build more properties, which could result in the merging of Sale and Carrington. With other proposed developments in the area, it appears there would be no separation between Partington and Carrington either, meaning that the three communities would merge into one huge housing estate, separated only by the planned major road networks! Totally inconsistent with the objectives set out in the NPPF.

This would, ultimately, significantly impact the green belt land, including the openness of the overall area.

Given the nature of the existing use of the property, and the Government's (and Trafford's) stated aims to increase the health and wellbeing of the population through exercise and other activities, it would be far more appropriate to redevelop the equestrian centre, or simply remove the unsightly buildings without any additional residential development.

OBJECTION BASED LACK OF VISIBILITY OF THE CARRINGTON MASTERPLAN

Trafford are currently developing a Masterplan for the Carrington area. We strongly believe that the Masterplan should be published (following the completion of a wide range of public consultation opportunities) before a development which alters the use of green belt land is approved.

This planning application, whilst small in terms of number of properties, would set a major precedent in terms of building on green belt land in Trafford. The application refers to land



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which is sited in an area which has one of the lowest levels of green space in Trafford and, given that Trafford has the lowest proportion of green belt in the whole of Greater Manchester (with the exception of the city areas of Manchester and Salford), this development should not be approved until the broader strategy for the area, which will be set out in the Carrington Masterplan, has been reviewed in detail and fully considered by local residents.

OBJECTION BASED ON LACK OF EVIDENCE OF SUSTAINABILITY

The document states that the proposal '*is a sustainable development*'. What is the evidence that this is the case? How is this validated. It is not enough to just make the assertion. It should be proven within the documentation too.

The National Planning Policy Framework indicates that there are three dimensions to sustainable development - economic, social and environmental. We do not believe this proposal meets any of the NPPF objectives for the reasons set out in the table below.

NPPF Objective	Why this proposal does not comply
Economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure	Despite a statement that the ' <i>proposed development also results in economic benefit</i> ' this is not the case. In fact the opposite is true, this development will reduce the local economy. The jobs being created are only temporary construction work for a small number of people and the permanent and temporary jobs associated with running an Equestrian Centre and Riding School will be lost. In addition, the livery and riding centre revenue, together with the associated income for other local businesses will also be lost. Furthermore, those horse owners who currently stable their horses at this site will need to find another location, which could be outside the local area and could lead to economic hardship and very difficult choices.
Social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being	This proposal will result in an isolated community with no local access to amenities (such as shops, GPs surgeries and schools), little public transport and no mains drainage (the plan is to use septic tanks for waste).



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Environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy	The proposal will clearly be harmful to the local environment, biodiversity and wildlife (including endangered birds and other creatures). It is also not beneficial to the heritage asset on the site. Please see our more detailed objections set out below.
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OBJECTION BASED ON IMPACT TO HERITAGE ASSETS

The NPPF promotes the protection of heritage assets and the historic farmhouse is linked with an equestrian heritage that predates the existing farm buildings, beginning in medieval times. A full archaeological investigation should be carried out as this is one of the few parts of the Northern edge of Carrington which is untouched by industry.

We disagree that the proposed development will have a beneficial impact on Ackers Farmhouse itself, which is a listed Grade II building. The construction phase could be highly detrimental and documentation acknowledges that the proposed development will result in permanent changes to the site and, therefore, to the setting of this heritage asset, with these additional residential units dominating the site in future.

We would, therefore, argue that, based on the definitions in the Assessment Methodology (Appendix 2 of the Heritage Statement Addendum), the magnitude of change is at least **Moderate**, rather than **Minor**. For this the definition (Historic Landscape Attributes) reads '*Change to many key historic landscape elements, parcels or components; visual change to many key aspects of the historic landscape; noticeable differences in noise or sound quality; considerable changes to use or access; resulting in moderate changes to historic landscape character*'. Furthermore, the definition for '*Built Heritage or Historic Urban Landscape Attributes*' includes '*Changes to the setting of an historic building, such that it is significantly modified*'. In fact, the changes to the setting are so significant (building an apartment block is a huge change), they could be considered to be **Major**, ie '*Comprehensive changes to the setting*' of the historic building.

With this in mind, we believe that the proposed development will have a significant impact on this heritage asset, which should be considered to be harmful and paragraphs 193 to 196 of the NPPF, along with other related paragraphs, should be considered when reviewing this application.

It is recognised that the '*significance of Ackers Farmhouse largely relates to the architectural and historic interest, relating to the age and degree of intactness of the farmhouse and the relationship with the converted barn*'. We totally disagree with the statement that an apartment block '*will create built surroundings and spaces more contextual to the historic structures*'. Equestrian buildings are consistent with the historic setting, residential developments, particularly apartment blocks, are not!

Additionally, the document states that '*the land use will alter in some areas, with the large area of hardstanding alongside the access drive altered to become a soft landscaped area, the hardstanding and stable yard to the south of the farmhouse becoming a grassed area, and the existing external riding arena becoming meadow land*'. Whilst these may be considered beneficial in the short term, we believe that these areas will be the subject of future planning applications, if this residential development is approved.



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OBJECTION BASED ON IMPACT ON LOCAL WILDLIFE & BIRD SPECIES

We dispute the conclusion in the Design and Access Statement that the '*proposed development would not result in any harm to protected species*'. The Application Form itself acknowledges that there are protected and priority species on the development site!

It should also be acknowledged that this development adjoins Carrington Moss, a natural habitat that hosts considerable wildlife, including red listed birds and other endangered or declining species. The proposal does not recognise the ecological value of Carrington Moss, as neighbouring land, its biodiversity and important habitats for those species. Nor has it acknowledged the trees and hedges on Carrington Moss, adjacent to the proposed site, which are certainly important in relation to the local landscape character. As mentioned above, Trafford's own Development Plan recognises Carrington Moss as a '*Local Nature Conservation Site*'.

Despite the assertions in the application, turning these equestrian buildings into apartments and houses will have a severe impact on the local populations of wildlife, birds and bats, increasing the noise and other disturbances to their natural habitats. The security considerations for the site would impact the surrounding area in terms of light pollution, changes to the boundary hedging and trees.

We are surprised to note that there is no new Bat Survey. The previous application included a survey which had been carried out at a time when '*bats are moving towards hibernation sites*' which means that evidence from summer roosts '*are likely to have decomposed or have been washed away*'. This survey cannot, therefore, be used as evidence that there is no bat activity on the site itself. At the very least a new survey should be required. It is noted that the initial Bat Survey did recognise the level of bat activity on Carrington Moss itself. Furthermore, the presence of nesting birds in the existing buildings was noted.

This application will not '*assist in safeguarding the countryside from encroachment*', siting residential buildings in the middle of green belt land will result in a severe impact on the biodiversity of the surrounding area.

OBJECTION BASED ON TRAFFIC CONGESTION

Carrington Lane is extremely busy during rush hour but not at other times of the day. This change of use will severely impact rush hour traffic, whilst the existing equestrian traffic is spread throughout the day (the document itself states that equestrian use generates traffic movements '*during both day and evening times*'). Due to the lack of other means of reaching this community (see objection on lack of public transport and traffic free links below), the main transport option for those living or visiting here would be by car.

The transport statement (Technical Note Document) states that there are 35 horse owners who keep horses at the existing Equestrian Centre, '*all of whom have an obligation to visit the site at least twice a day to attend to the horses*'. It should be noted that some of those horse-owners do not visit the site by car.

We'd like to see a validation of the stated '*trip generation*' figures confirming:

- current and estimated future trips during rush hour traffic,
- current equestrian traffic in more detail (the figures in the documentation appear to be overstated)
- current and estimated future heavy/large vehicle traffic (the existing properties on the site have septic tanks, the potential future properties will also have septic tanks – these do generate large vehicle traffic but this is not mentioned in the report)



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The anticipated additional traffic generated by the new development during rush hour would increase the potential for road traffic accidents, whether minor or major, and will also increase air pollution (see objection based on air pollution below).

OBJECTION BASED ON AIR & NOISE POLLUTION

In conjunction with the rise in traffic congestion, exhaust fume pollution in this area will increase, affecting the health of local residents and active travel users.

Whilst the additional pollution caused during the construction can be dealt with via a construction management plan, on-going pollution, particularly during rush hour, including that which will be caused by traffic being held up whilst residents enter and exit the site will not be covered in such a plan. As mentioned above, if this application is approved, much of the future two-way daily vehicle movements will take place during rush hour, adding to the existing congestion.

It is also recognised that septic tanks need to be emptied out regularly to prevent the significant health and environmental risks that can ensue when the tanks overflow or malfunction. There is no mention of this traffic in the report (large vehicles with multi-thousand gallon tanks and heavy equipment, approximately once a year per property, at a minimum).

In addition, as mentioned above, endangered wildlife and birds will be impacted by the increased noise and air pollution caused by this development.

OBJECTION BASED ON LACK OF PUBLIC TRANSPORT & TRAFFIC FREE LINKS

There is little public transport (one bus per hour will not address the needs of residents to reach work, school and other locations) and poor traffic free links to this site. The current traffic congestion already makes this route challenging, even for experienced cyclists.

A narrow track exists along the A6144 (Carrington Lane), however, it is in very poor condition and is very dangerous in rush hour. This will mean residents of this development are unlikely to want their children to walk or cycle to school, nor are they likely to walk or cycle to work, the route is very noisy and polluted during rush hour.

There are no local shops or other amenities, except for the green space on Carrington Moss, so whenever these residents want to leave their homes, they will probably do so by car!

We can find no evidence in the documentation to substantiate the claim that this development will enhance '*the residential amenities of the nearby residents*'. In fact, in contradiction of this statement, elsewhere in the document it asserts that the '*proposed development would have an acceptable impact on the amenities of neighbouring dwellings*'. This is clearly not the case!

We are also concerned about the Public Right of Way (Carrington 19) across the site and would like more clarity about the how the plans may impact walkers who wish to use this PROW. We believe that security concerns, planned fencing and landscaping may affect the ability of the community to use this path, which should be accessible, including to those with disability needs.

There is also a concern that vehicles will begin to access that the PROW route (Carrington 1) at the back of the site, to try and avoid the traffic issues set out above, thus impacting the many walkers, cyclists, horse-riders, birdwatchers and other nature enthusiasts who currently use Carrington Moss.

OBJECTION BASED ON LACK OF COMMITMENT TO AFFORDABLE HOUSING

In order to meet the NPPF requirement for redevelopment of existing buildings within the green belt, the development **MUST** '*contribute to meeting an identified affordable housing*



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need within the area of the local planning authority'. Despite the recognition that the Trafford's affordable housing contribution is 40%, the Application Form states that all the housing will be **Market Housing**.

The document also talks about a '**potential requirement**' for 7 affordable units. Stating that the '*applicant recognises that there will be a need to provide for affordable housing*' then qualifying it with a suggestion that '*the amount and mechanism*' will be **negotiated** with Trafford once the principal of the development has been established is **NOT** a commitment!

OBJECTION BASED ON IMPACT TO THE LOCAL COMMUNITY & USERS OF CARRINGTON MOSS

It is interesting that the document refers to '*extensive pre-application discussions with Trafford*', as there has, once again, been a total lack of community communication and consultation about this development. It seems that even those people who have horses in the stables have not all been told about these plans.

In addition to neighbouring properties, the impacted community includes users of Carrington Moss, including those who use the Public Right of Way through this site.

There should be more evidence about the plans to communicate and consult within the documentation. Stating that the '*residents at Ackers Yard have been consulted on the proposals and the majority were very supportive*' is **NOT** genuine consultation! In fact, the previous application had a number of objections from neighbours, as well as other local residents.

OBJECTION BASED ON FLOOD RISK

Whilst this site is considered to be outside of the flood plain, it should be noted that the whole of Carrington Moss is subject to flooding on a regular basis, with standing water in fields and on the footpaths (recently there was extensive surface water flooding near this site for over 6 months). Building on this site is likely to exacerbate the existing problems in surrounding fields as more water will need to be accommodated. This will also impact local wildlife. It is noted that the application does not confirm that the flood risk elsewhere will not be increased.

OBJECTION BASED ON PUBLIC SERVICES

There is already a strain on public services in the area, whether it be GPs surgeries or schools. There is no provision in the plans to address this.