

FOCM MIQ Response – Matter 23



Friends of Carrington Moss
Matter Number 23

Matter Allocations in Trafford

Issue 23.1 Is policy JPA33 New Carrington justified and consistent with national policy, and would it be effective in achieving sustainable development?

Green Belt

Q23.1. How would the development proposed in policy JPA33 on the New Carrington allocation affect the Green Belt purposes set out in NPPF 138?

JPA33 will result in green belt purposes (a), (b) and (c) being weakened significantly. The planned developments will also not comply with NPPF paragraph 137 as the construction of warehousing will severely impact openness. Document 07.01.25 (c3, p113) states that the Allocation will “*reduce perceived settlement separation*”, and that “*the overall impact of the Allocation here will still be very high*”. The 4 major new roads exacerbates this issue as the documentation for the Carrington Relief Road suggests that the road will be elevated (stating “*with the current vertical alignment assumptions for the route the peat is not expected to be disturbed*”).

07.01.25 (c3, p111) confirms that JPA33 “*would cause ‘Very High’ harm to Green Belt purposes*”. This is evidenced by the harm ratings, for which almost 90% of the land to be released is considered to result in very high, high or moderately-high harm and just 10% in moderate harm.

We have concerns about the ratings given for purposes 2 and 3 (which suggests all the land scores as either moderate or weak. We believe TF 26, TF 29 and TF35 should be scored as “strong” for both these purposes.

Word Count: 191

Q23.2. (a) Is the inclusion of two areas of Green Belt (total around 395 hectares) within the allocation boundary justified and consistent with national policy? (b) Would it be effective in providing an unambiguous policy for assessing potential future development proposals in those two areas?

- a) In addition to the lack of demonstrable exceptional circumstances to release green belt, (our representation p140), the Allocation does not comply with a number of clauses in the NPPF, including (but not limited to) paragraphs 84, 104 and 174. It is also contrary to national policy in relation to climate change.
- b) JPA33 currently includes brownfield land which has planning permission, construction has commenced. It also includes land that is to be retained within green belt. The P4E documentation is very confusing in terms of the figures that apply to

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various policies or assessments (see p121 of our representation and Para 3.34, document 03.01.04, which states JPA33 includes residential/employment floorspace which is in the existing land supply, “*these totals have therefore been excluded from the allocation viability assessment*”). The area should be split into several Allocations, and each should be measured against the site selection criteria/viability separately.

JPA33 will result in confusion for landowners, developers and residents. This is already being evidenced. Part of the green belt has been identified for habitat mitigation for a planning application where the landowner proposes destruction of an existing SBI within the Allocation area. Yet the very same mitigation area is included in the landowner’s development plan (for warehousing) and part of that mitigation area has been selected by another landowner for 100 additional car parking spaces. As the landowners clearly have ambitions that far exceed those in the current Plan, it is essential that there is clarity about the land that is in scope for development and that which is not. As suggested above, this will be best achieved by splitting the area into several smaller Allocations to ensure the Policies are effective.

Trafford’s response to a recent [FOI request](#) states that “*Further masterplanning will be required for the New Carrington allocation which may lead to changes to the development parcels*”. In addition, given the lack of permanent boundary features (see 23.3), the effect of construction on local hydrology (impacting the condition of the reserves), along with developer ambitions, it is likely the remaining green belt will be constantly under threat.

Word Count: 349

Q23.3. Would policy JPA33 be effective in ensuring that the proposed Green Belt boundaries around the New Carrington allocation are clearly defined using physical features that are readily recognisable and likely to be permanent?

JPA33 does not propose effective new green belt boundaries, required by NPPF paragraph 143(f). Document 07.01.25 (column 3, p113) confirms the strong function of the woodland belt to the east of the area will be lost, proposing (column 4, p112) that new boundaries should be created by “*planting significant new landscaped buffers*”, despite the area including both Carrington and Warburton Mosses. This would be contrary to [national guidance](#), which suggests that such planting should avoid adversely affecting peatmoss or “*other land where it affects the hydrology of peatlands*”.

In addition, contrary to the protection of existing woodland (column 4, p112), implementation will destroy significant swathes of woodland habitat.

It should also be noted that the 4 major new roads planned as part of the development will add to the confusion about boundaries as they will cut through the site in various places, permeating any perceived separation of communities. These roads will also fracture what is currently a wide, open landscape, balanced by copses, corridors and coverts of trees.

The current consultation about the [Hydrogen Pipeline](#), which will cut through the Allocation area, also gives rise to concerns about physical boundary features, as parts of the pipeline will be overground.

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Word Count: 199

Q23.4. Would policy JPA33 be effective in securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of removing the New Carrington allocation from the Green Belt?

The Authorities have no clear understanding of what will be lost. We disagree that a comprehensive evidence base was assembled (07.01.25, paragraph 1.8). There is no evidence that Carrington Moss has “*limited ecological value*” (paragraph 8.30). There has been no assessment of natural capital value or ecosystem services. There is no recognition of climate mitigation capabilities, benefits of bmv agricultural land, impact on irreplaceable habitats/ecology/biodiversity, nor an understanding of the rural economy. The impact of development on existing traffic-free routes (and the people who use them) and the openness/landscape views has also been omitted.

The Plan will bring huge increases in air, noise and light pollution, increased carbon emissions and will result in population decline/decimation for endangered species. Construction will also cause changes to hydrology, significantly affecting the peatmoss. Given the consequences for irreplaceable habitats, the Policy will be totally ineffective in securing compensatory improvements. This is confirmed by Natural England advice, (representation p124) that “*Development on peat will cause permanent damage*” and “*will destroy a much larger area of habitat than the actual footprint of development due to hydrological dependency/linkages.*”

Much of the remaining green belt is inaccessible to the general public, which will be exacerbated by 4 major new roads, not only fracturing the health and wellbeing routes for many communities of users, but also fragmenting the foraging corridors for endangered species.

Word Count: 224

Site Location

Q23.5. Is the New Carrington allocation suitably located, having regard to the Plan’s spatial strategy and the national policy aim of promoting a sustainable pattern of development?

New Carrington is considered to provide (03.04.01, paragraph 6.31) “*the only opportunity in Greater Manchester to deliver a new settlement of significant size*”. Yet, there is nothing in the spatial strategy to suggest this is a requirement, nor is there any evidence that other sites were considered. Given the aim of the Plan to boost northern competitiveness, it is inconsistent to locate such a site in Trafford.

Currently an unsustainable, isolated community (paragraph 4.71), poorly served by public transport (paragraph 4.72), with plans for an unsustainable low density suburban development, the site will mostly be accessed by car. The Policy brings no trams, no trains

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and no commitment to increased bus services. 09.01.02 suggests (paragraph 115) that the aim is to minimise road-freight miles. Yet, despite the proximity of the Manchester Ship Canal and the disused railway lines, there are no plans for sustainable freight. We set out our concerns about the lack of amenities, school places and health facilities in our representation (p132). Other aspects of unsustainability include the plan to build on a peat moss, grade 2 (bmV) agricultural land, woodland and wetland habitats, the predictable increases in carbon emissions, air, noise and light pollution and flood risks.

Suggesting JPA33 meets all site selection criteria, except criterion 4, is incorrect. 07.01.25, for example, does not include criteria 1 (column 1 p111) as green belt land (and POL) is neither well-served by public transport, nor previously developed land. As mentioned in 23.2, the area should be split into several Allocations, and each should be measured separately against the site selection criteria.

Word Count: 262

Development Requirements

Q23.6. What is the purpose of the area identified as ‘Local Plan’ on Picture 11.48? Is the policy clear and unambiguous as to what is expected in this area?

This Local Plan area is being dealt with outside of P4E. It should not be included within the Allocation area. As suggested in our response to Q23.2, the area should be split into several Allocations to increase clarity and transparency.

Word Count: 40

Q23.7. (a) How have the effects of development on heritage assets on land to the west of Warburton Road been considered as part of the site allocation process? Is the allocation justified on this basis? (b) Is criterion 4 consistent with national policy on proposals affecting heritage assets and will it be effective in ensuring development does not have an unacceptable impact?

- a) The importance of conserving and protecting the Deer Park at Warburton, the peatmoss and the Rides at Carrington Moss cannot be over emphasised.
- b) JPA33 does not recognise our heritage assets are an “*irreplaceable resource*” (NPPF 189), nor does it comply with paragraph 190. The current plans will have an unacceptable impact on the heritage assets mentioned at (a) above.

Having been reviewed twice by Planning Inspectors, and found to be unsuitable for development, the land at Warburton Lane is inappropriate for inclusion in the Allocation. It is performing purposes a, b and c (NPPF paragraph 138) and should be designated as green belt, along with other POL within the Allocation area.

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Word Count: 113

Q23.8. What is the purpose of the final sentence of criterion 7 and the New Carrington/Masterplan/SPD and Trafford Local Plan providing additional guidance on appropriate housing contributions for each Character Area? Is it intended that these could depart from the 15% minimum set out in the policy? Is the criterion clear and unambiguous about what level and type of affordable housing will be sought from the development?

Given the planned construction on peat and contaminated land, we are concerned that even the low figure of 15% affordable housing will not be viable. The Plan should clarify how the 15% affordable housing is expected to be funded and delivered.

A recent meeting of [Trafford's Executive](#) highlighted the shortfall of funding for the Carrington Relief Road (over £30m and rising). The document states "*To address the issue of the funding shortfall, the Council anticipates further s106 monies and Community Infrastructure Levy (CIL) from future private developments which would benefit from the scheme*". This may leave limited funding for affordable housing and other requirements.

Word Count: 104

Q23.9. Are the other development requirements set out in policy JPA33 consistent with national policy and justified, and would they be effective in securing sustainable development on the New Carrington allocation? In particular:

The Allocation will not be effective in securing sustainable development, it is non-compliant with a number of national policies, including (but not limited to) NPPF paragraphs 84, 92, 93, 104, 105, 140, 141, 174, 189 and 190. It is also contrary to national climate change policy.

JPA33 also conflicts with Plan Policies JP-Strat13, JP-Strat14, JP-S1, JP-S2, JP-S4, JP-S5, JP-S6, JP-G4, JP-G9, JP-P1, JP-P2, JP-P5, JP-P6, JP-C1, JP-C3, JP-C6 and JP-C7.

The Allocation will bring significant increases in road traffic and associated air, noise and light pollution, along with carbon emissions. No evidence is provided about current air pollution levels, nor is there any predictive analysis of future figures. The carbon emissions data also lacks appropriate level of detail.

10.09.07 notes (paragraph 8.4) that the Allocation performed negatively against IA objectives for resilience to the effects of climate change, reducing risk of flooding and conserving/enhancing landscape. In addition, developing on this peatmoor will cause a massive carbon emission event and destruction of this irreplaceable habitat cannot be offset by any amount of BNG.

Given there are no other places in Trafford where we can:

- restore peat, to more effectively capture and sequester carbon, so future generations can breathe cleaner air

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- 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
- increase significantly the populations of endangered birds/wildlife, to help nature's recovery, increase biodiversity and mitigate the impact of climate change

we are astounded that this rich habitat, with a long history of extensive surface water flooding has been included in the Plan for development rather than for protection. Flooding not only damages property, it impacts the mental and physical health of both human and wildlife populations. In addition to superior carbon capture capabilities, restoring the peatmoss would bring numerous ecosystem [benefits](#).

Word Count: 309

a) Scale and density of development (criteria 2, 6, 9 and 21)

No further employment land should be permitted unless there is a clear obligation to provide sustainable passenger and freight transport options.

The area has a number of hazardous installations and there are several more in close proximity. The Plan should identify how the increased populations of residents and employees will be evacuated quickly, safely and effectively in the event of an incident.

Please also see our response to 23.5.

Word Count: 69

b) Approach to masterplanning and/or SPD (criterion 1)

The community should be fully engaged in the development of any masterplan/SPD to ensure all important local issues are taken into consideration.

Word Count: 22

c) Delivery of different house types (criterion 5)

Given paragraph 11.320 suggests that there will be a single new community that links to existing towns and villages, the concept of Character Areas is interesting. Partington's new community will have its own amenities, separated from the existing community, labelled 'East Partington'. The Sale West development is disconnected from existing communities by landscape features.

We struggle to understand how the development can "*Integrate successfully*" (criterion 4ii), when to do so would merge the surrounding townships. The retained green belt would no longer be consistent with the purposes set out in the NPPF.

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It should also be noted that the development is not aligned with the Strategic Principles set out in Trafford's recently published [Design Code](#).

Word Count: 115

d) Approach to phasing (criterion 12)

Development phasing should be planned to follow the implementation of sustainable passenger and freight transport options. There should be no development on land which would impact the potential for the peatmoss to be restored.

Word Count: 34

e) Financial contributions to infrastructure delivery, including operation of the 'equalisation mechanism' (criterion 13)

Clarity is needed about whether this will include contributions to sustainable passenger and freight transport options, active travel improvements, affordable housing, school places and other public amenities.

Word Count: 27

f) Delivering transport or other infrastructure necessary to mitigate the transport impact of development (criteria 14 - 20)

There are no sustainable passenger or freight transport options aligned with this development, making it non-compliant with NPPF paragraph 104(c). The road transport infrastructure mentioned will not mitigate the transport impact of development and will encourage yet more through traffic.

Documents 09.01.15 and 09.01.27 report different numbers for both housing and employment space to the Plan and do not provide the required information to determine the actual level of traffic. We cannot find any reference to HGV numbers in those TLAs. This appears to be a specific requirement of PPG 007(ID:54-007-20141010) - *"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 documents also lack the transparency needed to determine whether traffic from outside the borough is adequately considered. This is important as changes to, for example, the Warburton Bridge Toll (currently under consideration) could result in fluctuations to traffic volumes.

Despite what is written in the Plan, the Transport Strategy 2040 confirms the disused railway proposal is for active travel, not for sustainable passenger or freight transport options. This former railway line, that runs into the centre of the Allocation area, could have been proposed for restoration to secure sustainable freight and passenger traffic when the Plan

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was conceived some 7 years ago. Resident requests for workshops to discuss their ideas for resolving local transport issues have not been responded to.

The only commitment in document 09.01.02 is the Carrington Relief Road, which will bring huge increases in air, noise and light pollution, along with increased carbon emissions. It will impact rural businesses and will detrimentally affect a number of sites of biological importance in the area. The construction of this road will also affect the hydrology of the area, hampering opportunities to restore the peatmoss.

The recommendation made in IA document 02.01.02 suggested that more detail should be provided about the transport network for the Allocation (paragraph 7.11). The 2020 Updated Position (page 63) confirmed that the wording was not amended to include references to public transport.

Word Count: 344

g) Provision of local and neighbourhood centre, including scale and mix of uses (criteria 21 and 22)

The lack of community involvement is obvious. Only Carrington Village needs a Neighbourhood Centre. A new local centre in Partington will be divisive and will impact the regeneration of the existing centre. Sale West already has plans to develop a new community centre.

Word Count: 43

h) Provision and contribution to provision of additional primary and secondary school places and health facilities (criteria 23 and 24)

NPPF, paragraph 95 outlines the importance of sufficient choice of school places for both existing and new communities. The Plan needs to demonstrate that this Allocation is compliant (not only with the NPPF, but also with Objective 9).

Given that the resident population of Bucklow St Martins Ward alone will increase by over 72% as a direct consequence of the Allocation (and by over 90% when other, already approved, planning applications in the Ward are considered). We believe Trafford has underestimated the required school places.

A Red risk on [Trafford's Strategic Register](#), the unprecedented demand for school places was highlighted to [Trafford's Executive \(September 2021\)](#).

The Plan should clarify where school places will be provided. This should be included within the evidence base.

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, which again will see families having to drive elsewhere to access health services.

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Word Count: 189

- i) **Protection and enhancement of green infrastructure, including the areas at Sale West that are identified as being protected (criteria 28-31). What is the justification for protecting these areas?**

Document 07.01.20 (page 13) confirms 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*” the Allocation. Much of the retained green corridor is not accessible to the general population as it hosts a number of commercial/sports organisations.

There are over 1,000 horses stabled on and around Carrington Moss. Horse riding is a daily activity, benefiting large numbers of residents and children with Special Educational Needs. The developments will prevent access to traffic-free circular routes, severely curtailing those activities and impacting both the businesses (stabling, livery services, supply chains) and the users themselves.

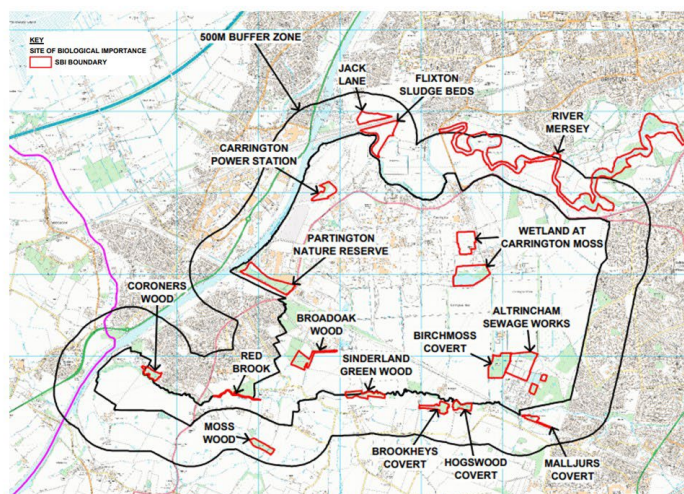
As set out in our response to Matter 10 (Q10.8), JPA 33 does not comply with NPPF paragraph 99, as the required assessment is not available. The area is used extensively for active travel, with the Transpennine Trail/Sustrans Route 62 running through the site. JPA 33 does not comply with NPPF paragraph 100, as the Allocation will fracture existing PROWs, impacting numerous users and walking/cycling/horse riding next to busy roads will be unhealthy, unpleasant and unsafe.

Given the many other demands on developer contributions and Council funding, evidence should be provided to confirm the commitment to enhancement of PROWs and provision of play equipment/outdoor sports facilities.

There are a number of local SBIs and the proposed development will have a huge impact on populations of endangered birds/wildlife, decimating their breeding and feeding habitats.

SBIs & SSSIs on and around CM

Important, nature-rich habitats that should be preserved



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The expected substantial increases in air, noise and light pollution will not only affect birds/wildlife, Carrington Moss is a social prescribing destination, appreciably benefiting the mental and physical health of residents. The stress related to potential widespread and frequent surface-water flooding will also affect local residents.

Word Count: 292

j) Protection of biodiversity assets, including the Brookheys Covert Site of Special Scientific Interest and local Sites of Biological Importance and project specific habitat regulations assessment (criteria 32-36).

Planning to develop on peatmoss is neither sustainable nor consistent with national policy. The Allocation lacks compliance with a number of NPPF clauses, including paragraphs 174, 179 and 210/211. The proposals do not demonstrate “*exceptional reasons*” nor offer “*a suitable compensation strategy*”, as required by NPPF paragraph 180 (c).

The Allocation will not protect and enhance natural environment assets (criterion 32) as the planned level of development will cause irreversible harm to natural capital resources.

The documentation should be updated to cite Carrington Moss as one of the GM Wetlands Nature Improvement areas (see our response to Matter 9).

It is irrational to decimate historic wetland habitats, then propose restoration and creation of new areas of wetland (criterion 33). Measurable gains in biodiversity (criterion 34) are fanciful too, when impacted land includes irreplaceable habitats!

The overall flood risk and drainage strategy (criterion 34) is not available but will need to be compelling given the water levels consistently present on the mossland. The Government's [planning guidance](#) has recently been updated and Councils will need to demonstrate developments will be safe from flooding for their lifetime, will not increase flood risk elsewhere, and, where possible, will reduce flood risk overall.

The Allocation does not comply with Plan Objective 8 as building on an irreplaceable habitat will compromise the quality of our natural environment, causing biodiversity loss, and will severely limit access to green spaces. Globally threatened birds/wildlife species will be displaced, their foraging sources diminished, their populations put at further risk. The scenery will be dominated by new roads and warehouses, rather than landscape views stretching for miles, with high levels of traffic noise, rather than birdsong. Carrington Moss will no longer be able to support climate resilience and reduce flood risk, which it does so well today!

Not only is there a lack of evidence about the site's natural capital value (despite a district level Natural Capital Account), there is no evidence to demonstrate Carrington Moss has “*limited ecological value*” (paragraph 8:30).

Our original response also highlighted:

- IA (02.01.01) recognition of the importance of moss/wetland habitats
- The vital role of peatlands in the transition towards a low-carbon economy and in mitigating climate change
- The advice received from Natural England, both in document 07.01.26 but also in the response to Trafford about the planned route of the Carrington Relief Road
- The area is the mitigation site for approved planning applications

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- The destruction of woodland habitats.

Word Count: 403

- k) Landscape character and design, including the conserving and enhancing the setting of the Dunham Massey estate and Warburton Deer Park and the provision of substantial landscape buffers and (criteria 37-39)**

Given the green belt/POL is peatmoss habitat, the landscape is open, the views far-reaching, the planned developments are not justified and will be non-compliant with NPPF paragraphs 20 (c), 130 (c), 145, 153, 174 (a) and 185 (c).

Please also see our responses to 23.3 and 23.7.

Word Count: 47

- l) Conserving and enhancing the historic environment and positively conserving archaeological features (criteria 43 and 44)**

See our response to 23.7.

Word Count: 5

Viability

Q23.10. Is there a reasonable prospect that the New Carrington allocation could be viably developed at the point envisaged?

03.01.04 suggests the viability for this Allocation is finely balanced, making it particularly vulnerable in the current financial climate. Transparency is essential, the associated assumptions and contingency should be more visible. It is unclear whether the carbon emissions offset costs are included in the viability assessment, including those for changes in land use. Development on peat moss will be complex and expensive (drainage and hydrology will need to be harmonised, to avert flooding but ensure the health of the remaining reserves is not impacted). Sustainability will be challenging to achieve.

Word Count: 90

Total Word Count: 3,471

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Kind regards

Marj Powner (Chair)

Friends of Carrington Moss