



Friends of Carrington Moss Objection to Planning Application 109755/OUT/22

30 Elmwood

Sale

M33 5RN

31st December 2022

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

Dear Sir/Madam

Objection to Planning Application 109755/OUT/22

I am writing to confirm that the Friends of Carrington Moss **objects** to this application for the following reasons (which are outlined in more detail in the attachment below):

- Policy Conflicts
- Impact on Woodland Habitat, Site of Biological Importance and Nature's Recovery
- Lack of Sustainable Freight Transport Options
- Impact on Climate Emergency and Carbon Neutral Action Plans
- Landscape and Visual Impact
- Lack of Community Consultation

In summary, this proposal does not meet Trafford's Core Strategy Policies, Trafford's Carbon Neutral Action Plan, or the requirements of its declaration of a Climate Emergency. It is also not aligned with the Policies set out in the Places for Everyone Regional Plan, which is currently being examined.

In addition, the documents include factually incorrect and conflicting information. It does not satisfy the requirements of the NPPF, and, if approved, this development would be detrimental to nature's recovery, negatively impacting the habitats of endangered bird and protected wildlife species and will result in considerable, harmful changes to the surrounding environment.

As there are alternative sites which could be used for this development, it is premature to submit a planning application which would destroy a woodland site of biological importance.

We note that the documentation on the Planning Database is unhelpfully structured. The Technical Appendices, in particular, contain several documents which should have each been separately included on the database, rather than being subsumed within other documents.

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

Kind regards

Marj Pownier

Chair

Friends of Carrington Moss



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OBJECTION BASED ON POLICY CONFLICTS

This Planning Application conflicts with the following Trafford Policies and associated documents:

- Declaration of a Climate Emergency (November 2018)
- Carbon Neutral Action Plan (December 2020)
- Core Strategy 2012
- Unitary Development Plan 2006
- Emerging Places for Everyone Policies

It also conflicts with the Government's National Planning Policy Framework (NPPF) and associated Planning Practice Guidance, along with the England Peat Action Plan, the UK Forestry Standard and the Wildlife and Countryside Act (WCA) 1981 (as amended). Examples are provided in the following paragraphs and sections.

There are numerous examples of non-compliance with the NPPF, we provide an example here and more throughout this objection.

Paragraph 185 of the NPPF states that planning decisions should ensure that new development is appropriate for its location "taking into account the likely effects (**including cumulative effects**) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development".

The sheer volume of traffic, especially HGVs, will significantly increase air, noise and light pollution in what is currently a relatively tranquil area that has an intrinsically dark landscape (populated by endangered/protected wildlife, along with bat species, and a number of red listed birds). The application is, therefore, not consistent with paragraph 185 of the NPPF.

The proposal also conflicts with a number of Policies within the Core Strategy (2012) and the UDP (2006), including Policy L4.1(e), which states that the Council will ensure that "*development proposals within less sustainable locations will deliver, or significantly contribute towards the delivery of, measures to secure infrastructure and services that will improve access to more sustainable transport choices*". As set out later in this document, there are no proposals for sustainable freight transport, despite the purpose for which this application has been submitted.

Core Strategy Policy R2 requires development to ensure the protection and enhancement of the natural environment of the Borough. Developers are required to demonstrate how their proposal will "*Protect and enhance the landscape character, biodiversity, geodiversity and conservation value of its natural urban and countryside assets having regard not only to its immediate location but its surroundings*". This planning application proposes to eradicate a Grade A Site of Biological Importance (SBI), a wet woodland habitat that currently hosts a number of red listed birds and endangered/protected wildlife species. The level of additional traffic caused by the development will also impact the adjoining southern part of the Shell Pool SBI and will have wider implications for Carrington Moss.

Whilst the Planning Statement (paragraph 6.26) highlights that "*There may be some potential for some additional development within the inner COMAH zone*", the Landscape Technical Note suggests (page 114) that owing to a range of wider constraints, the site is "*considered to be the only feasible location within the locality which can accommodate units of this size*" and also states (paragraph 1.5) that this site is critical for the delivery of the wider New Carrington Masterplan. Given the size of the proposed New Carrington development, there clearly **are** alternative locations, making this site, particularly the area of the woodland SBI, inconsequential, rather than critical, to the overall Plan. It is, therefore, premature to submit an application to eradicate an SBI prior to the outcome of the Places for Everyone (P4E) Examination.

Paragraph 37 of the New Carrington Topic Paper (P4E document 10.09.07) states that the Plan for New Carrington will "*Retain important landscape views and features such as the rides, hedgerows and tree belts and use these features to develop a distinct sense of place at Carrington*". Clearly this application is not consistent with that commitment.

It should be noted that the Carrington Objectives within the Core Strategy (page 46) include



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- CAO13: To protect and enhance areas of environmental importance
- CAO14: To protect and enhance the Mosslands as a natural carbon sink to mitigate the effects of climate change
- CAO15: To provide clearly defined green corridors to join the urban fabric with the surrounding greenspace assets
- CAO16: To improve access to the surrounding open countryside.

Policy SL5.4 states that "*In order for development in this Location to be acceptable the following will be requiredThe protection and enhancement of the sites of nature conservation and biological importance*". This Planning Application is clearly in conflict with this requirement.

It also contradicts Policies within the emerging Places for Everyone Regional Plan, which is currently under examination, including the following:

- Policy JP-G 1 Valuing Important Landscapes, which states that "*Development should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location*"
- Policy JP-G 2 Green Infrastructure Network, which confirms that ecosystem services will be protected and enhanced
- Policy JP-G 4 Lowland Wetlands and Mosslands, which suggests that wet woodland will be maintained and enhanced
- Policy JP-G 7 Trees and Woodland, which aims to protect and enhance woodland and significantly increase tree cover, including requiring two for one replacement of any loss of trees due to development
- Policy JP-G 9 A Net Enhancement of Biodiversity and Geodiversity, which states that sites designated for their nature conservation will be protected and that the mitigation hierarchy will be followed (the first stage of which is avoidance of harm).

OBJECTION BASED ON IMPACT TO WOODLAND HABITATS

The Core Strategy highlights (Policy R2.3) that the Borough's assets include "*Designated sites and species of national, regional and local importance*", "*Local Nature Reserves*", "*Sites of Biological Importance*" and "*Woodland, hedgerows and hedgerow trees and trees*".

NPPF paragraph 131 highlights the important contribution of trees to both the character and quality of urban environments and also their ability to help mitigate climate change. The framework suggests that existing trees should be retained wherever possible.

The Arboricultural Impact Assessment states that the significant loss woodland habitat is "*considered unavoidable*". We disagree. Given the Wain Estate's plan for the area (set out on page 20 of the Design and Access Statement), and notwithstanding the constraints of the COMAH zones, there are clearly other opportunities for such development (subject to the availability of sustainable freight transport). The applicant's assessment that the loss of 6.6 hectares of woodland is "*not considered harmful to the character of the area and is therefore consistent with local planning policy R3*" is incomprehensible.

We also disagree that the mitigation measures are either adequate or appropriate for the loss of an SBI. The Planning Statement (paragraph 6.12) confirms that the proposed mitigation will not deliver a 1:1 replacement planting for every tree lost. This is unacceptable. P4E Policy JP-G7 requires that "*Where development would result in the loss of existing trees, requiring replacement on the basis of two new trees for each tree lost, with a preference for on-site provision*".



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Replacement trees would need to be planted in an appropriate location. The Aboricultural Impact Assessment (paragraph 3.4) suggests that "*The mitigation is proposed within an area of arable land, overlying peat, to the south of the retained area of Shell Pool SBI*". This is not aligned with national guidance. Both the England Peat Action Plan and the UK Forestry Standard state that tree planting should not be considered on peatland. The "*arable land*" is Grade 2 best and most versatile (BMV) agricultural land. Considering both the underlying peat and the BMV agricultural land, the proposal is contrary to NPPF paragraph 174.

The Aboricultural Impact Assessment (paragraph 3.5) states that "*the proposed development will result in the complete loss of the northern section of the Shell Pool SBI (non-statutory designated site), however extensive appropriate mitigation measures, states that the off-site proposals, including the creation of wet woodland, ponds, scrapes, scrub and modified grassland, will be provided resulting in a Negligible effect on the SBI during the operational phase*".

This is totally disingenuous. How can a "**complete loss**" result in a "**Negligible effect**"?

It should be noted that hedgerows are also extremely important habitat and should be protected and enhanced - not removed.

OBJECTION BASED ON HARM TO NATURE'S RECOVERY

The Government has made international commitments to supporting Nature's recovery, an ambition which is supported by Natural England. The planning application mentions frequently that it is part of the New Carrington development, which is an Allocation of around 1,154 hectares within the P4E Regional Plan. Given the size of the overall site, and the importance of this SBI, it is unreasonable for 6.6 hectares of woodland to be sacrificed for the intended purposes.

Planning Practice Guidance (PPG) states that the first step in the mitigation hierarchy is to avoid significant harm to wildlife species and habitats by locating development on an alternative site, with less harmful impacts. Given the landowner's plans for the area, there is no justification for the loss of this SBI.

It should be noted that, as a Grade A SBI, the existing woodland is considered to be important at a GM level, not just for Trafford. The complete loss of this woodland must be regarded as having a significant impact on the environment, on the natural resources and, in particular, on biodiversity. In addition, the calcareous ground conditions and type of habitat is not common in this area. The permanent loss of this site of nature conservation should be avoided as set out in the PPG.

Government Policy, Regional Policies (including the 5-year Environment Plan), P4E, Trafford's Core Strategy and UDP, all contain policies which seek to safeguard the intrinsic features of sites of nature conservation interest or value.

NPPF paragraph 180 states that "*if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused*". We do not believe this Planning Application meets this requirement as the planned mitigation will not compensate for the loss of ecology and biodiversity, including the impact on populations of red listed birds, protected wildlife and other species.

The applicant suggests (paragraph 3.2) that "*Despite the proposed tree losses, it is anticipated that a net-gain in tree canopy will be achieved in the long-term*". How long is "*the long-term*"? It is likely that the planned developments (shown in the Wain Estate's version of the New Carrington Masterplan in various documents within the application) will severely impact any mitigation habitats and the ecology/biodiversity that is to be encouraged there. The Planning Statement (paragraph 6.12) confirms that the proposed mitigation will not deliver a 1:1 replacement planting for every tree lost. The current tree cover can be considered to be mature based on the Woodland Trust definition, which states that "*A tree becomes mature when it starts producing fruits or flowers*". We do not have confidence that the Biodiversity Net Gain (BNG) proposed will be achieved nor that it will deliver the expected improved habitat in terms of distinctiveness demanded by the BNG "rules".



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In fact, we have no confidence that the benefits and mitigation set out at paragraph 1.6 of the Landscape Technical Note will materialise. In particular, the statement that habitats will be subject to a "*robust 30 year management plan*" is rather unconvincing given that the current SBI has (according to the Planning Statement, paragraph 1.4) been "*subject to minimal management*". The document goes on to suggest that a legal obligation will be necessary, via S106.

The Planning Statement (paragraph 1.6) describes the mitigation and compensation proposed as a "*comprehensive package*", with "*extensive new habitats*", resulting in "*measurable net gains in biodiversity*". Yet, as mentioned above, the replacement habitat is BMV agricultural land, which already supports a number of species of red listed, ground nesting, farmland birds. This is not an additional site that is being provided through the mitigation proposal. It is merely a rebadging of the existing site (albeit removing the rural activities that currently take place there).

The Plan is to surround this mitigation area with warehousing and, given the lack of sustainable freight transport options, create a significant increase in the associated air, noise and light pollution. This, together with consideration of the underlying peat moss, does not represent a sustainable mitigation solution. We disagree totally with the statement at paragraph 1.6 which suggests the proposed development complies with UDP Policy ENV9, Core Strategy Policy R2 and paragraph 180 of the NPPF.

The importance of this SBI has been extensively understated. It is staggering that the Assessments in this application find every potential impact either "*negligible*" or "*insignificant*" and that, despite the intention to substantially increase traffic (including HGVs), to destroy an SBI and to comprehensively change the landscape of the area, the application is considered to comply with all "*relevant development plan policy*".

As an example, the Non-Technical Summary suggests (paragraph 5.6) that "*with the successful delivery of the habitat creation in the identified off-site area, residual impacts on the sites/habitats/fauna considered in the assessment would either be Negligible or Minor Beneficial*". We do not consider that replacing 6.6 hectares of mature woodland with the mitigation proposed can be considered to be either "*Negligible*" or "*Minor Beneficial*" for the reasons set out in this objection.

The documents themselves confirm that protected wildlife creatures are present on the site, along with red listed birds, bats and other species. We are concerned by the statement at paragraph 5.4 (page 40) of the Ecology Technical Note, which suggests that "*It has been agreed (with Derek Richardson from GMEU) that achieving a 10% net gain in biodiversity units and providing woodland mitigation on a like for like basis is not a requirement. Rather a bespoke package of habitats that reflect those seen within the southern section of Shell Pool will be more favourable when considering the wider Carrington area*". We disagree and consider the net gain required to compensate for the loss of an SBI should be extensive, bringing wide-ranging, **committed** environmental and ecosystem benefits. What is proposed within this application does not meet those expectations.

Relocation of protected species to artificial setts, disturbing the nesting places of red listed birds and the foraging sites of other creatures does not contribute to nature's recovery. The "*short term*" impact arising from the felling of the woodland, described at paragraph 6.5 will result in more than a "*temporary loss of resources for fauna using that part of the SBI*". This plan is likely to reduce further the already depleted populations, which will continue to be disturbed by other development plans in the area.

It will take many years for the new habitat to mature sufficiently to replace the resources lost. During this period, the landowner proposes significant development in the area, which will bring air, noise and light pollution and huge disturbances to wildlife habitats, such that species populations will become further diminished and the losses will be used as a reason for further development. In addition, the massive increases in traffic, including HGVs, will also significantly increase the amount of roadkill in the area.



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We totally disagree that there “*can be a high degree of confidence that the mitigation package will be sufficient to adequately compensate for the loss of the northern portion of the SBI*” (paragraph 6.5). Nor do we agree that it will “*result in a significant benefit arising from the closer proximity of the new habitat to the southern part of the SBI*”. The current area has little to no human footfall, the new area would be accessible to dog walkers and other users of the moss. We also do not agree that the proposal will create “*habitats that are more favourable than those currently present*”.

The proposed disturbance of protected species is not compliant with The Wildlife and Countryside Act (WCA) 1981 (as amended). Protected wildlife species are known to be present in the at-risk woodland area and the Bat Survey confirms (paragraph A8.2.7, page 23) that it is used by foraging bats. Bat activity was recorded at all 6 static recording stations and on each survey visit.

The Wintering Bird Survey confirms that the site is used by numerous priority species and the area is considered to be of county importance. The survey recorded (paragraph A8.4.12, page 32) 32 species on site, of which 16 are species of conservation concern. The Breeding Bird Survey recorded five priority bird species (A5.3.12, page 37) either confirmed or probably breeding within the site.

The Water Vole Survey highlighted (A8.6.13, page 45) that some sections of the watercourses were unable to be surveyed as they were inaccessible or unsafe to enter. Whilst the survey found no conclusive evidence of water voles, it did indicate that they may be present within the area (A8.6.20, page 46). Burrows and mammal runs were recorded.

We totally dispute the conclusion in the ES Non-Technical Summary (page 11) that the ‘*Habitats to be lost largely comprise those of no inherent significance*’. The ES Non-Technical Summary itself acknowledges that there are protected and priority species on the development site and we are aware of previous sightings of GCN/water voles in the area.

For the reasons set out in this section, we have no confidence that Nature’s Recovery has been appropriately considered.

OBJECTION BASED ON LACK OF SUSTAINABLE TRANSPORT OPTIONS

The Non-Technical Summary Environmental Statement suggests (paragraph 5.11) that “*After the implementation of all of the mitigation measures, the impacts of the proposals upon the traffic and transport-related environmental factors are considered to be Not Significant*”. We disagree. We do not consider adequate mitigation measures to have been proposed. The lack of sustainable freight transport options is a clear example of this. The resulting traffic will have an extensive impact on both the local and the strategic road networks.

Despite the recognition that Planning Policy Guidance promotes sustainable transport, the Vectos Transport report (included in 109755_OUT_22-VOLUME_3_TECHNICAL_APPENDIX_PART_2-1145787) does not mention any sustainable freight transport options.

Table 6.8 (page 88) does not appear to include the B2 traffic. This would result in a total of 2,905 vehicle movements a day, of which at least 735 would be heavy goods vehicle traffic. The PM Peak HGV figure in Table 6.10 appears to be incorrect.

This report contains some other confusing data. Paragraph 5.3 states that 6.9 hectares of open storage will remain, whereas paragraph 6.41 suggest the figure will be 3.5 hectares. Paragraph 6.16 of the report does not include reference to the Trafford Green Hydrogen Planning Application (105316), which will result in over 700 HGV movements a day when fully operational.

Given these errors and omissions, we have no confidence in the figures at Table 6.10, which does not show a 12 hour traffic impact, only the impact at peak times. There is no confirmation that the site will not be used by traffic on a 24x7 basis. In fact, the Noise Assessment is based on 100% occupancy of docking bays during the daytime and 50% occupancy in the night-time.

It should be noted that the report does not highlight that the pedestrian and cycle infrastructure will be fractured by the CRR (nor that walking and cycling next to a major road will be unhealthy, unpleasant and unsafe).



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The document suggests that the Carrington Relief Road "*future proves the proposal.*" (page 28) and that the contribution towards the CRR should be considered (Planning Statement, paragraph 6.39) "*a significant material consideration in favour of the granting of planning permission*". Yet, this is not a sustainable transport option. The Core Strategy highlights, for both Carrington (p22) and Partington (p21), the need "*to utilise the opportunities offered by the Manchester Ship Canal for increased sustainable transportation*". This planning application does not propose this, despite the application to create logistics-based employment opportunities.

The Core Strategy, Policy 4.11, Freight Transport Network, states that the Council will promote the improvement and development of sustainable and efficient movement of goods. The Policy goes on to say that, in particular, "*it will safeguard and promote the improvement of* "The Manchester Ship Canal as a sustainable transport route" and "*Provide an opportunity for a significant reduction in commercial vehicle movements on the road network*". Paragraphs 13.16 to 13.18 set out further the vital role sustainable Freight Transport has to play to fulfil economic, social and environmental potential.

Given the number of pre-application discussions about the traffic implications, why has Trafford not insisted on sustainable freight transport options for New Carrington given the proximity of the Manchester Ship Canal and the former railway line?

We note that there are no proposals for free access to local community transport to ensure available jobs are attractive for local people and that sustainable passenger transport options are utilised rather than cars.

The document mentions GM's Transport Strategy 2040 and its "*Right Mix*" proposals. It fails to mention the expectation set out in the Strategy that there will be "*zero net growth in motor vehicle traffic in Greater Manchester between 2017 and 2040*". Achieving this aim will not be possible without sustainable freight transport options, the lack of which will result in huge increases in air, noise and light pollution for both local residents and wildlife species. This does not comply with the expectations in the NPPF, which suggests that (paragraph 104d) appropriate opportunities for avoiding and mitigating the adverse effects of traffic should be considered at the earliest stages of development proposals.

The Transport Assessment mentions (paragraph 6.60) that the adverse impacts on the local highways network will not be severe and would be alleviated once the CRR is delivered. This does not take into consideration the cumulative impact of all the developments approved to date in the area and the lack of sustainable freight transport to be provided. Given the significant increases in traffic, the impact on the local road network, and the strategic road network, is likely to be acute.

OBJECTION BASED ON THE ECONOMIC ARGUMENT

At the meeting Wain Estates had with the community (30th August 2022) they confirmed that they currently have no tenants engaged in discussions. This would mean that the SBI will be destroyed on the basis that there is **expected** to be interest. This brings into question the assessment that 1,610 permanent jobs would be provided by the development. This figure may not be achieved for a number of years. This suggests that there are actually no **committed** benefits arising from this development.

In addition, the Planning Statement suggests (paragraph 1.5) that there is a significant need for B8 logistics units at a local and a regional level. There is no evidence of this "*significant need*". Logistics with sustainable transport solutions can be based in more appropriate locations and distribute product accordingly. The proposal set out in this planning application does not deliver a sustainable solution for the reasons set out elsewhere in this objection.

The Planning Statement suggests that there are no alternatives at Carrington, or elsewhere in Trafford, capable of satisfying the need for large B8 logistics units. This is patently incorrect. The Wain Estates Masterplan shows large areas of development planned that do not require the destruction of an SBI. In addition, there are large sites within the region, including at Manchester Airport and at Port Salford which are in much more sustainable locations.



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The document goes on to say that "*The proposed development in this location is required to deliver the quantum of employment development anticipated in the emerging Greater Manchester Places for Everyone (PfE), within the context of other constraints at Carrington, namely COMAH restrictions and underground/overground services*". Again, this is incorrect, the delivery of the employment requirements in P4E does not require the destruction of an SBI.

Given the huge amount of industrial/warehousing already approved in Carrington, some focus should be applied to other types of employment, particularly options which will deliver greater diversity of job opportunities and benefits to the local community (such as retail, innovation, technology) and to green jobs that will support the mitigation of the climate emergency.

As mentioned above, any future approvals of logistics employment in Carrington should be subject to the delivery of sustainable freight transport.

The economic benefits set out in the report (paragraph 6.42) suggest that "*approximately two-thirds of the potential jobs at Carrington Junction are likely to be in the logistics and warehousing sector*". This will not deliver the employment diversity needed by local people. We do not have confidence that there will be "*a broad range of job types and skill bases, including skilled positions and management roles*".

It is interesting that Wain Estates are expressing an interest in supporting local populations through the regeneration of Carrington when they have recently removed a number of local small businesses from Carrington Business Park. This approach does not reflect "*a clear imperative and opportunity*" to help local workers through the challenges, nor to "*deliver economic and social value to local communities*".

Whilst the document talks about discussions with the Council about the "Trafford Pledge", there is no information about the number of current employees who live in the local communities surrounding the Wain Estates current operations. In addition, as these units will be taken up by tenants, they may bring their existing workforce with them (as has happened previously in Carrington).

Intriguingly, the document states (paragraph 6.46) that the approval of this site could "*attract further investment and occupiers (and consequently jobs and GVA) into the area*". Yet, this could surely not be the case if there are no alternative sites for this proposal?

The document makes no mention of the economic benefits of trees and woodlands. The Government suggests that trees have a monetary asset value and also bring other financial benefits through carbon sequestration, recreation, landscape and biodiversity. Elements of the value of trees can be measured both qualitatively and quantitatively, to include "*physical health and mental wellbeing, cultural symbolic and educational benefits, woodland conservation, noise, flood and heat reduction, and water quality and availability*". This recent report highlights that non-woodland trees also bring huge benefits, stating that a "*large individual tree, with a canopy diameter of 30 metres, provides hundreds of pounds of benefits a year*".

Finally, there is no recognition that the rural economy will be impacted by this development, particularly given that mitigation is proposed on Grade 2 Agricultural land.

For these reasons we do not believe that local benefits will be delivered (never mind maximised) and we disagree that the economic benefits of this proposal are significant. Given our comments above, we do not believe that the "*economic benefits comprise an important material consideration in the determination of this application*", nor should they "*attract substantial positive weight in the planning balance*".

OBJECTION BASED ON CLIMATE EMERGENCY

Neither the removal of the woodland (destroying an SBI), nor the proposed mitigation (on Grade 2 BMV agricultural land) are consistent with Trafford's declaration of a climate emergency, nor with its Carbon Neutral Action Plan. Despite including a Carbon Budget Statement (section 8), there is no mention of the loss of carbon sequestration from the trees to be felled nor from the impact to the peat on the mitigation site.



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The Core Strategy requires (policy L5) that new development should “*mitigate and reduce its impact on climate change factors, such as pollution and flooding and maximise its sustainability*”

The Air Quality Assessment suggests (page 32) that “*The long-term (annual) assessment of the effects associated with the proposed development with respect to Nitrogen Dioxide (NO₂) is determined to be ‘negligible’. With respect to PM10 and PM2.5 exposure, the effect is determined to be ‘negligible’ at all identified existing sensitive receptor locations*”.

We disagree with the assessment that the impact will be negligible. It should be noted that emissions are likely to be extremely high during the periods of high traffic use. Considering emissions over a 24 hour period or on an annual basis does not accurately portray the impact on both humans and wildlife.

The Core Strategy states (L5.13) that development that has potential to “*cause adverse pollution (of air, light, water, ground), noise or vibration will not be permitted unless it can be demonstrated that adequate mitigation measures can be put in place*”. The lack of sustainable freight transport options means that such mitigation measures have not been considered.

To suggest that an increase of over 700 HGVs in a 12 hour period, together with over 2,000 other vehicles will have a “*negligible*” impact on pollution is reckless. Carrington Village now has its own air quality monitor, which should be used to determine more accurate existing figures and future estimates.

We are particularly concerned with the cumulative impacts of air, noise and light pollution, given all the planned developments in the area. The Air Quality Assessment states (page 46) that, because the construction period is anticipated to last for less than 18 months, “*consideration of the potential air quality effects associated with construction vehicle emissions was scoped out*”. Yet, this will not be the only construction programme being carried out over the same period.

The Assessment is flawed for a number of reasons, not least of which is that the Ecological Receptors do not include the closest sites (ie the Shell Pool and the Birch Moss Covert SBIs). The document states (page 53) that “*It should be noted that the IAQM Guidance only requires the assessment of ecological receptors which are located within 200 m of the affected road network. Therefore, all ecological receptors have been scoped out of this assessment*”.

In addition, the Non-Automatic Monitoring refers to sites in Stalybridge and Ashton under Lyne!

The Noise Assessment is also flawed as it makes no reference to the impact of noise on the Sites of Biological Importance. The significant noise and light pollution caused by the operations on this site will significantly impact bird and wildlife species. The cumulative impact of noise and vibration pollution should also be considered.

There is no light pollution assessment included within the application. The security considerations for the site would impact the surrounding area in terms of light pollution, as will changes to the boundary hedging and trees.

Mitigation on Grade 2 Agricultural land conflicts with Core Strategy R4, particularly policy R4.5, which states that “*The Council will protect existing agricultural land as an important resource for Trafford’s local economy*”. Whilst the policy continues with the mention of particular protection for the richest soils, it is clear that the Core Strategy intends to protect this Grade 2 agricultural land and the statement suggesting otherwise (at paragraph 6.75) is incorrect.

The application also disregards Policy R4.6. This policy states that “*the Council will consider appropriate farm diversification proposals where it can be demonstrated that the proposal would not:*

- (a) Replace the existing agricultural use;*
- (b) Have a detrimental impact on the existing ecology and landscape of the area; and*
- (c) Be contrary to Government Guidance or other policies within this Plan”.*



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This proposal violates each of these criteria and is also in conflict with paragraph 170 of the NPPF. Whilst the mitigation area is less than 20 hectares, the loss is significant in terms of the loss of local food production opportunities with a low carbon footprint, the impact to the rural economy and the disturbance of red listed farmland bird populations.

The proposal seems to suggest (paragraph 6.77) that these conflicts can just be ignored and that, because BMV land is allocated for development in the emerging P4E Plan, the loss of such land is "*likely to be essential*". We disagree and believe that the potential cumulative impact of planned development on BMV land will increase the significance of the losses and will substantially outweigh the unconfirmed "benefits" of the proposed development and, as set out in our objection based on the economic argument, there are currently no **committed** benefits arising from this development.

We also have concerns about surface water and drainage. The wet woodland is currently soaking up standing water. When this land is concreted over, it will add to the difficulties in an already challenged area. In addition, the Ground Conditions report identifies a number of contaminates that could potentially affect water courses (even if adequate drainage is provided). Further data collection should be undertaken (as recommended in the report) prior to any decision being taken about the site.

It should be noted that the [Government's legally binding targets](#), which aim to drive action to tackle climate change, restore our natural capital and protect our much-loved landscapes and green spaces, protecting the environment, cleaning up air and rivers and boosting nature (published 16 December 2022) will need to be considered.

The Non-Technical Summary Environmental Statement suggests (paragraph 1.5) that this development should be considered to be part of what is set out in Core Strategy Policy SL5, which was subject to a Sustainability Appraisal through the Local Plan process. Yet, that Core Strategy did not envisage this SBI being destroyed.

OBJECTION BASED ON LANDSCAPE AND VISUAL IMPACT

This planning application conflicts with a number of policies relating to landscape and visual impact. The Core Strategy Policy R2, for example, states that developers will be required to demonstrate how their proposal will "*Protect and enhance the landscape character, biodiversity, geodiversity and conservation value of its natural urban and countryside assets having regard not only to its immediate location but its surroundings*".

It also contradicts UDP Policy ENV17, for which the Council should consider the impact on the landscape quality of the immediate area, the wider setting and on features of importance to wildlife.

It is astounding that the ES chapter on landscape and visual impact identifies that the overall effects of the proposed development **would not be significant**. The proposal destroys a woodland and puts a 22m high warehouse in its place. That cannot be considered as anything other than extremely significant!

The document suggests (paragraph 5.42) that "*no key features of the landscape will be lost or adversely affected by the Proposed Development*". This is an unbelievable statement given that a woodland SBI will be totally destroyed. The document goes on to suggest (paragraph 5.43) that the area is "*being predominantly industrial in nature and heavily influenced by the surrounding urban context within which it sits*". Again, this is incorrect, the area to the East and South of the site are Green Belt, rather than urban, and have a very rural landscape.

The Arboricultural Impact Assessment states that "*The collective visual amenity the trees provide to the area will be preserved and enhanced and therefore the proposal is not considered harmful to the character of the area and is therefore consistent with local planning policy R3*". This statement is ridiculous. The majority of the trees will be removed. The character of the area will be extensively harmed and the visual impact comprehensively changed.



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This application is contrary to the advice given in P4E document 07.01.06 (GMSF Landscape Character Assessment (2018)) which suggests amongst other guidance (page 70) that open and long ranging views should be maintained.

The Landscape Technical Note recognises (paragraph 3.12) some of the special landscape qualities and key landscape sensitivities of the site, including that the elevated parts of the landscape are widely visible to neighbouring areas. The application does not mention that the GMSF Landscape Character Assessment (P4E document 07.01.06) states (page 69) that the summary of the special landscape qualities and key features/attributes that would be sensitive to change (as a result of development) includes "*Remnant mosslands and moss woodlands, many of which are designated locally as SBIs*".

This P4E document 07.01.06 (page 66) also specifically mentions the local area, confirming that "*Views tend to be internal due to the flat or gently undulating, low-lying nature of the land, with surrounding development often forming the backdrop*". This is certainly the case on and around Carrington Moss, where this development will be extensively visible from the surrounding area, including local public rights of way, two of which are opposite the site and, of course, Isherwood Road itself is a popular walking route.

The document advises (page 70) that Local Authorities should, among other things, "*Protect areas of semi-natural habitat, including mosses and moss woodlands, which are locally designated as SBIs or nationally protected as SSSIs. Seek to enhance these where possible and provide linkages to form robust habitat networks*" and they should "*Retain the quiet and tranquil character of the mosses by discouraging inappropriate land uses and development*".

There are no planned changes to the Green Belt designation for this area in the emerging P4E Plan and the scale of the proposed buildings will harm the setting and rural character of the adjacent countryside. The buildings will be prominently visible from surrounding areas. The retention of the woodland would screen surrounding areas from the previously developed land beyond.

Core Strategy policy L7.3 states that development must be compatible with the surrounding area and not prejudice the amenity of the future occupiers of the development and/or occupants of adjacent properties by reason of overbearing, overshadowing, overlooking, visual intrusion, noise and/or disturbance, odour or in any other way. This planning application does not meet that requirement.

It should be noted that, in response to a number of our suggested alternative sites for development (put forward as an alternative to Green Belt development), Trafford's Strategic Planning Team stated "*housing adjacent to industrial uses has potential to cause amenity issues*". In this case, the oppressive height of the proposed buildings will dominate the area, changing the landscape and significantly impacting the outlook for the local community.

The Design and Access Statement Key Design Principles (page 22, 4.1) includes several mentions of the character of the buildings, including the scale, height and massing, making reference to how they should relate to the surrounding context, the mid-distance views and sensitive landscape treatment.

Yet, the buildings proposed will be incongruous and inharmonious with the surrounding area.

The document continues with a graphic on page 23 that sets out the importance of (among other things):

- Creating a sense of place and identity
- Minimising wider visual impact
- Minimise visibility from surrounding area

The proposal does not achieve any of these.



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Incidentally, the graphic also mentions Strategic Infrastructure – yet, there is no planned sustainable freight transport – and Designing in sustainability – yet the development plans to destroy an SBI, mitigate with trees on peat, impacting Grade 2 BMV agricultural land, construct inappropriate buildings at a huge height, generating substantial volumes of air, noise and light pollution in a relatively tranquil area. We disagree with the conclusions in the Planning Statement (paragraph 1.10) which suggest that the uncommitted benefits *“outweigh any development plan conflict”* and that the mitigation package would (at some point in the distant future) *“enhance ecological and biodiversity value”*. There will be both direct and indirect impacts on local communities (and bird/wildlife populations) in relation to landscape, visual amenity, access to sunlight, traffic volumes, etc. With this in mind, the development cannot be considered to comprise sustainable development!

This development, if approved, would have a significantly harmful impact on the character and appearance of the area. To the West of the site there is significant brownfield land and this woodland SBI provides a barrier to that land for the neighbouring area (including the Green Belt), which is currently typified by farm and farm-type buildings, along with stables and equestrian buildings, surrounded by largely open land. Whilst the buildings have been reduced from the original 30m height to 22m, the proposed design would be totally out of character and would not *“contribute positively to the character and appearance of the area”*, as suggested in the Planning Statement (paragraph 1.8). In this respect the application would conflict with Core Strategy Policy L2.2(c) which states that development should not be harmful to the character or amenity of the immediately surrounding area.

In addition, the Planning Statement (paragraph 6.8) suggests that *“harm to the southern part of the SBI would be avoided”*. We disagree. The destruction of the northern part of the SBI, the construction of huge logistics buildings and the associated traffic implications will increase air, noise, light and vibration pollution, which will impact the ecology and biodiversity of the southern part of the SBI.

The document appears to suggest (paragraph 5.47) that, due to the level of construction in the area, these works would not be inconsistent with the changing landscape. It should be noted, however, that none of the other planning applications suggest destroying an SBI. The document continues (paragraph 5.50) to suggest that, whilst there will be a noticeable change to views, this is not inconsistent with the current visual context. We wholeheartedly disagree. Replacing a woodland with a 22m high warehouse will be totally inconsistent with the current visual context.

The document recognises (paragraph 5.52) that the proposed development will be visually intrusive for the localised area, particularly for adjoining residents and users of nearby public footpath routes and that these populations will experience *“a noticeable change to views”*. The document repeats (paragraph 5.53) that this is not inconsistent with the current visual context, but we would argue that this is incorrect and no amount of *“soft landscaping”* (paragraph 5.54) will result in *“relatively unchanged”* views, given the height of the proposed buildings.

We, therefore, find the conclusion (at paragraph 5.55) that *“there would be No Significant Adverse effects on landscape character, and that where Significant Adverse effects are experienced by a small number of visual receptors, these will be highly localised and will affect a limited number of users and as such considered to be Not Significant”* absurd!

OBJECTION BASED ON GREEN BELT IMPACT

The planned mitigation area is within the Green Belt and the proposal is harmful. The land to the East of the at-risk woodland site is also Green Belt and the landscape will be substantially impaired.



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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*'. In addition, the NPPF promotes the continued protection of the Green Belt.

This Planning Application is contrary to the aims of Green Belt protections.

OBJECTION BASED ON LACK OF COMMUNITY CONSULTATION

NPPF paragraph 132 states that "Applicants should work closely with those affected by their proposals **to evolve designs** that take account of the views of the community". The landowner suggests (paragraph 5.2) that the proposal has gone through a number of iterations but, whilst the document confirms (paragraph 4.5) that Wain Estates did **notify** some community groups in advance of submitting the planning application, it should be noted that being "*provided with details of the proposed development in advance of the planning application being submitted*" is not consultation! In addition, Wain Estates made it clear at the meeting that we had not been invited to give our ideas about how to improve the proposal.

It should also be noted that the mitigation area presented at the meeting appeared to be larger than that now included within the application. We did point out to Wain Estates that the mitigation area they were, at that time, proposing, showed warehouse developments in the Wain Estates Masterplan for the area and that we understand that Manchester United wish to develop a 100 space car park, opposite the entrance to their site.

Given that this is such a sensitive application, it is surprising that the landowner has not made more effort to engage with the community to seek their ideas about how the loss of a site of biological importance can be avoided (as set out in Planning Practice Guidance).

INACCURACIES AND EVACUATIONS

It should be noted that there are a number of inaccuracies within the documents. We highlight one example here and there are further examples in the specific sections above.

The Design and Access Statement suggests (03.3) that "*Existing infrastructure surrounding the site area provides numerous amenities including several hospitals around the area in Sale, Urmston and Partington*". This is incorrect, there is only one hospital in the area, which is in Davyhulme.

We are also concerned that the increasing volume of development in the area could lead to health and safety issues if there is a need to evacuate due to an accident or hazard becoming a reality. Access to sustainable passenger and freight transport would significantly reduce traffic on local roads, making it easier for residents and employees to evacuate safely and quickly if such an incident occurred.