



Friends of Carrington Moss Objection to Planning Application 108188/FUL/22

30 Elmwood

Sale

M33 5RN

11th January 2023

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

Dear Sir/Madam

Objection to Planning Application 108188/FUL/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):

- Lack of Sustainable Freight Transport Options
- Impact on Ecology and Biodiversity
- Impact on Climate Emergency
- Lack of Community Consultation

In summary, this proposal does not align with Trafford's Carbon Neutral Action Plan, or the requirements of its declaration of a Climate Emergency. The information available is very high level – we cannot determine, for example, whether the site is expected to operate on a 24x7 basis - although the noise assessment states (page 12) that "*the site will operate between hours of 0800 and 1800 hours*". It was also difficult to find any clarity about the number of additional HGVs per day that are expected to use local roads or how many people the site will employ. Whilst there is an estimate of the HGV numbers in the air quality assessment, the Transport Assessment should have discussed this in detail, especially given the nature of the employment at the sites.

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*". We do not believe pollution, flooding or sustainability have been considered in sufficient detail.

In addition, we believe it is premature for this application to be submitted for approval, given that the documentation itself recommends further ecological and biodiversity survey requirements.

As with other Planning Applications, there is no assessment of the cumulative impact of the multiple developments in Carrington. The Planning Department should require applicants to provide the total collective impact of already approved proposals, alongside the specific application, rather than each just suggesting that their individual impact is insignificant or negligible.

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

Kind regards

Marj Pownar

Chair

Friends of Carrington Moss



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OBJECTION BASED ON LACK OF SUSTAINABLE TRANSPORT OPTIONS

The Transport Assessment does not provide any information about the period of operation for the site. We cannot determine whether there will be traffic implications on a 24x7 basis. There is no information about the number of HGVs expected, although the site access will accommodate them. The Air Quality Assessment suggests there will be 87 HGVs a day, along with 313 other motor vehicles. That is less than 6 HGVs per day per warehouse and less than 21 other vehicles per day per warehouse. These are very low numbers which we think need some explanation given the Design and Access Statement (page 4) suggests the site will be used for "*light industry/storage/ trade counter development*".

The Transport Assessment suggests that an additional 400 vehicles a day makes a negligible impact on traffic in the area. We disagree. An additional 3% of traffic may be deemed negligible if there were no other developments in Carrington but there is no consideration of 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.

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 warehouse-based employment opportunities immediately adjacent to the Ship Canal!

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.

One of the key objectives in the Transport for the North's Freight and Logistics Strategy is to maximise the utilisation of rail and inland waterways. So, given the proximity to the Ship Canal and the former railway line to this development, why has Trafford not insisted on sustainable freight transport options for the sites?

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.

GM's Transport Strategy 2040 anticipates 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. 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.

OBJECTION BASED ON ECOLOGICAL IMPACT

We believe it is premature for this application to be submitted for approval, given that the documentation itself recommends further ecological and biodiversity survey requirements. Furthermore, whilst the preliminary appraisal mentions (paragraph 5.2.2) that a biodiversity impact assessment is recommended and that a habitat management plan will be required, there appears to be no commitment to Biodiversity Net Gain within the proposal.

We welcome the conclusion in the Executive Summary of the Ecological Assessment (page 4) that further surveys are needed to **inform the planning decision**. These surveys would need to be undertaken before any approval is given as there would be a significant ecological impact as a consequence of development at this site.



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We feel the value of the ecology and biodiversity on the three sites has been significantly understated.

In terms of policy, the Core Strategy highlights (Policy R2.3) that the Borough's assets include "*Woodland, hedgerows and hedgerow trees and trees*" and recognises that trees help tackle air pollution and remove carbon dioxide from the atmosphere. The 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 emerging 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*".

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

It is clear that this proposal will result in the loss of a number of trees and hedges. The preliminary appraisal noted (paragraph 3.3.19) that the "*trees at site 3 were all in good condition*". Yet, there is no indication of how such environmental damage will be compensated, including the loss of carbon sequestration through vegetation.

The Ecological Assessment comprised a preliminary appraisal, focused on suitability of habitat. It was not (paragraph 2.5.1) "*a full and definitive survey of any protected species group*". The document highlights (paragraphs 2.5.3 and 2.5.4) that there are areas which could not be surveyed and that it is possible protected or notable species are present.

Whilst we note that the preliminary appraisal recognised (paragraph 3.3.16) that sites 1 and 2 contain habitats suitable for use by foraging and commuting bats, it concluded that, because the sites are small, their value for bat species is likely to be low. We would disagree. There are few such sites in the vicinity, which means foraging areas such as this will be highly valuable. The document goes on to suggest (paragraph 4.3.8) that "*the sites are of moderate value for local bird populations*". For the same reason, we disagree. Given the surrounding area, we believe the site will be of high value to local bird populations, including red listed birds.

The content relating to a specific protected species has been redacted on the Planning Portal, but we understand this species is present at the site. The document also notes (paragraph 5.8.1) the potential for the presence of polecats and common toads and recommends that suitable habitat for these species should be retained (or created). There is no commitment in the proposal to any actions to support nature's recovery.

OBJECTION BASED ON CLIMATE EMERGENCY

There appears to be no recognition of Trafford's declaration of a climate emergency, nor of the Carbon Neutral Action Plan within these documents. The Carbon Emissions data, for example, only considers building materials and design. There are no figures showing the carbon emissions associated with the traffic increase or the change of land use (given the number of trees to be impacted by this application).

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 mitigation measures included in the Air Quality Assessment document are inadequate. Electric vehicles do not eliminate air pollution, for example, they only address one particular pollutant. The lack of sustainable freight transport options means that appropriate mitigation measures have not been considered.

We are particularly concerned with the cumulative impacts of air, noise and light pollution, given all the planned developments in the area. We note that the Air Quality Assessment for the Construction Phase does not include the cumulative impact of developments in Carrington in the factors considered (paragraph 3.3.2), yet, this will not be the only construction programme being carried out over the same period in the same area. We also disagree that the operational phase impact on air pollution is likely to be insignificant given the cumulative level of development in the area.



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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.

Carrington Parish Council has installed a fixed air quality monitor on Manchester Road, the resulting data is available [on their website at this link](#). This data should be considered key to determining the current and future air pollution implications for the area. The impact of additional vehicles on the current readings should be clearly set out within the documentation.

Given the substantial change from permeable to impermeable land uses (shown in Tables 2.2 and 2.3), there will be a significant increase in flood risk in the area, which will be of concern to both residents and other businesses. This is contrary to both local and national policy.

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". We are not aware of any community consultation for this planning application.

In fact, the Covering Letter included with the application dismisses Carrington Village totally, stating that the site is "*not close to any significant residential areas*". It should be noted that all the developments in Carrington are significant to local people, whether they live in the immediate vicinity or not. As mentioned above, this is because of the scale of development taking place in this area, which, although acknowledged by the applicant, the cumulative and very direct impact on residents is not recognised or addressed!

EVACUATIONS

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.