



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

30 Elmwood

Sale

M33 5RN

29th October 2023

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

Dear Sir/Madam

Objection to Planning Application 109755/OUT/22

Thank you for your letter of 24th October 2023. I am writing to confirm that, whilst we welcome the gesture of an improved mitigation proposal, the Friends of Carrington Moss continue to **object** to this application.

We believe the following reasons (set out in detail in our original objection letter, dated 31st December 2022) are still valid:

- 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 addition, we provide commentary in this letter about the documents submitted subsequent to our previous objection, including in relation to:

- The Revised Mitigation Proposal
- Counsel Opinion
- Need for the Scheme
- Alternative Sites
- Consideration of Places for Everyone
- Consideration of Trafford's Core Strategy
- Transport Options
- Trafford's Enhanced Biodiversity Duty

It seems there is ambiguity about whether this scheme should be considered under the existing Local Plan (the Core Strategy 2012), or whether, as it is now part of the emerging Places for Everyone spatial plan, it should be considered using the policies of that plan. Given that the Core Strategy and the remaining policies from the UDP are very dated, consideration should be given to refusing approval until the Places for Everyone Plan has been adopted. The application can then be considered against the policies within that plan, including JPA33, JP-G2, JP-G7 and JP-G9.

In our previous response we highlighted that this proposal does not meet Trafford's Carbon Neutral Action Plan, nor the requirements of its declaration of a Climate Emergency. The [Climate Scorecard for Trafford](#) (recently produced by Climate Emergency UK) do not make good reading! This proposal does not support an improvement in those scores nor will it help Trafford achieve its carbon neutral aims.



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It is clear that the issues we highlighted have not been resolved in the subsequent documents and we hope Trafford will give conscientious consideration to the detailed points we have raised, both in this letter and in our previous letter dated 31st December 2022.

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

Kind regards
Marj Pownert
Chair
Friends of Carrington Moss



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COMMENTARY ON THE REVISED MITIGATION PROPOSAL

Whilst we welcome the updated mitigation proposal, we believe there is room for further improvement. We particularly appreciate the relocation of the tree planting to a non-peatland area, but the trees are being replaced on a 1:1 basis, whereas the policy JP-G7 in Places for Everyone requires replacement on a 2:1 basis.

We also welcome the applicant's commitment to "*front loading*" the ecological mitigation but Volume 2 paragraphs 8.159 and 8.162, for example, both reference benefits related to future habitat maturity, which leaves us unclear about when such benefits will actually be delivered/achieved. In fact, in their response to Natural England's commentary, the developer's ecologists state that "*the mitigation proposed for the loss of woodland habitat in the northern part of the SBI will in time fully mitigate the impacts arising from its loss and lead to a negligible residual impact*". We, therefore, continue to have concerns about the immediate impact of this development on populations of red listed birds, endangered wildlife (including protected species) and other species.

The mitigation for the peatland area is particularly appreciated but we remain concerned that this land could be developed in later phases of the New Carrington proposals, particularly given the Wain Estates 2021 submission to Places for Everyone and Manchester United's desire to develop part of the area for car parking. Surrounding this land with warehouses and roads is unlikely to deliver the expected benefits.

We note that the Junction Summary document needs to be updated to reflect the new mitigation proposals.

We disagree with the suggestion from the applicant's Counsel that an acceptable mitigation and compensation scheme "*could be designed, with input from the CWT, GMEU and NE*", as we do not believe the mitigation hierarchy has been followed. That said, whilst we can find reference to discussions with the GMEU, the mitigation and compensation strategy does not seem to have had input from those organisations, neither have communities been consulted, which would be beneficial to the applicant.

COMMENTARY ON COUNSEL OPINION

In the case law cited by Counsel, the judgement stated "*What paragraph 90 does is to establish, in national planning policy, a proposition that will indicate a refusal of planning permission if it is not overbalanced by other considerations*".

Clearly, even taking this judgement into consideration, in the case of this planning application, development should be refused as the benefits are significantly outweighed by the following factors:

- The existing land use is a woodland SBI with a supposed level of protection in the NPPF, PPG, Trafford's Core Strategy, and the emerging Places for Everyone plan. As an example, the Core Strategy 2012 states (SL5.4 page 77) that "*In order for development in this Location to be acceptable the following will be required The protection and enhancement of the sites of nature conservation and biological importance*"
- The planning application is contrary to NPPF paragraph 174(a), which states that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)*



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- The planning application is also contrary to NPPF paragraph 185, which states that planning policies and 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.*" Given the nature of the development, the current use of the location, and the proximity of both the southern part of the Shell Pool Reserve and the recently developed housing, it is unlikely this development can meet what the paragraph goes on to state, ie that, in doing so decisions should:
 - a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason
 - c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation
- Significant weight should be given to the emphasis placed on refusal in NPPF paragraph 180(a) - these words are **NOT** used in every NPPF criteria, so it can be assumed that they have been included to highlight the importance of complying with the mitigation hierarchy
- This mature woodland is capturing carbon and supporting Trafford's carbon neutral aims
- The site is also home to endangered/protected wildlife and other species – which again, are supposed to have a level of protection in the NPPF, PPG, Trafford's Core Strategy, the emerging Places for Everyone plan and other legislation
- The timeline for the mitigation proposal to reach maturity is not clear and the timing of achievement of the benefits of that proposal is not sufficiently well-defined
- Trafford has an enhanced biodiversity duty which means it must consider what it can do to conserve and enhance biodiversity, including via the planning ecosystem
- Opportunities to reduce the impact of the scheme on local residents have not been explored (such as reducing further the height of the buildings and putting in place sustainable transport options)
- The development proposed only provides warehousing jobs – not a diverse range of opportunities that would appeal to local residents
- Whilst the applicant's letter also states that such large-scale sites "*could*" generate large employment opportunities, it has been shown, in previous new warehousing schemes in Carrington, that the new occupants could bring ALL their current staff with them (there are absolutely **NO** guarantees that there will be **ANY** jobs for local people)
- The consideration of alternative sites has been summarily dismissed by the applicant, but the site is part of an Allocation within the Places for Everyone Plan, which repeatedly encourages us to look at the plan as a whole. Given that GM has increased their warehousing land supply by **65%** from the baseline need (including by releasing Green Belt) to provide sufficient land to meet GM's requirements, it is unnecessary and premature to fell a woodland SBI prior to alternative sites being utilised
- Converting the site to a warehouse will **NOT** result in sustainable development, as, among many other points, there are **NO** sustainable freight transport options even being proposed, despite the huge increase in HGV traffic and there is no commitment to funding sustainable passenger transport options, despite the number of employees who will have to travel to and from the site



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- The development will result in a considerable increase of air, noise, light, vibration and water pollution that will impact the mental and physical health and wellbeing of both human and wildlife populations
- The development will result in huge landscape and visual impacts, given the size and scale of the warehouse and no consideration seems to have been given to reducing the height further
- The Levelling up and Regeneration Act received Royal Assent on 26th October 2023. Among other things, the Act strengthens the role of Local Nature Recovery Strategies within the planning system, with the legal duty meaning that LNRSs will directly inform planning policy at all levels. Greater Manchester was one of the pilot authorities for LNRS and, as such, is ahead of the game. Their [strategy](#) recognises the importance of tackling the "*biodiversity emergency in Greater Manchester, whilst securing the wider benefits that enhancing the natural environment will bring*".

In weighing up the different considerations relating to this scheme, the suggested benefits are significantly "*overbalanced by other considerations*" and should lead to a refusal of planning permission.

COMMENTARY ON THE NEED FOR THE SCHEME

The applicant's Counsel states that "*There is nothing in §180(a) NPPF or elsewhere in national policy that requires a developer to show that there is a need for a particular proposal*".

NPPF paragraph 119, however, states that decision-makers for "*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions*".

Council's, therefore, should take need into account as part of the planning balance but as shown, in our commentary on Counsel Opinion, this scheme does not provide sufficient benefits to outweigh its disadvantages.

In relation to the "*need*" for larger units, significant weight should be given to the fact that the site is part of an Allocation within the Places for Everyone Plan and, as such, it should not be considered for approval until the Places for Everyone Plan has been adopted.

Our commentary on consideration of the Places for Everyone Plan is below but that document repeatedly encourages us to look at the plan as a whole and, given that GM has increased their warehousing land supply by **65%** from the baseline need (including releasing Green Belt) to provide the land to meet GM's requirements, the "*need*" to locate this development on a site of biological importance is not established.

In addition, the applicant's considerations do not appear to take into account that, in relation to:

- "*Staff retention/availability of labour – There is a strong labour market in the vicinity of Carrington so it is crucial that we give existing Trafford occupiers, and further afield of course, the opportunity to grow their business in the borough*". Only warehousing jobs are proposed. It is also our experience that occupiers of other sites in Carrington have brought **ALL** their existing staff with them, which not only means that local residents do not have the opportunity to secure local jobs, but that many employees are travelling into the site using unsustainable transport options
- "*Environmental, social, and corporate governance (ESG) - Companies that are based or wish to be based in Trafford will have made a conscious decision to locate or remain in the area. Relocating could increase their carbon footprint and impact the cost base for the business due to increased transport costs*". Wain Estates are not proposing **ANY** sustainable freight transport options, despite the site generating a significant number of additional HGV journeys per day, which (alongside the loss of a carbon capturing woodland) will significantly increase the carbon emissions impact of the site.



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- *"Utilities - Carrington is attractive as a location given its history of heavy industry which benefits the area with an established infrastructure network and increased power capacity. This has proven attractive to both the distribution and manufacturing sectors, as the resilience of the utility network for an occupier is often fundamental to their choice of location. This has resulted in enquiries from a range of high-capacity users. The attractiveness of the site is enhanced by its access to the National Pipeline Network and the Manchester Ship Canal. The above factors provide a strong and unique selling point for the site in relation to a number of the competing sites in the North West".* As stated above, there are **NO** (zero) sustainable freight transport options being proposed, access to the Manchester Ship Canal is, therefore, immaterial to this planning application. If access to the National Pipeline Network is a material consideration, it does not come across as such in the planning application and would not result in the need for either the height of warehousing proposed or the number of additional HGVs per day on local roads.
- *"Scale - By being able to offer a range of unit sizes, Carrington can be a sustainable environment encouraging occupiers to expand within the location, as there are a range of buildings/sites available to expand into. If this cannot be offered, it will deter occupiers from considering the location as once their business achieves a certain size they may have to relocate or adopt a multi-site approach which creates another layer of cost for the occupier".* This is a very strange and narrow definition of what makes a "sustainable environment" and, whilst Wain Estates are expressing an interest in giving existing Trafford occupiers the opportunity to grow their business, locate or remain in the borough, they have recently removed a number of local small businesses from Carrington Business Park). Those businesses did not have the opportunities Wain Estates mentions here and many were rooted in the local community, putting jobs and livelihoods at risk despite trading on Wain Estates' land for decades.
- *"Trafford cannot afford to place a reliance on other boroughs absorbing the need for large scale logistics development under a duty to cooperate. This could lead to a net loss of existing businesses from Trafford (and indeed Greater Manchester) and a failure to attract new occupiers to the borough".* Trafford is participating in the Places for Everyone Plan, which encourages readers to consider the plan as a whole. As one of 9 participants in this plan, it is wholly acceptable for Trafford to determine that it is appropriate to share the disadvantages of huge levels of warehousing development with other boroughs, especially when so much development has been forced into one village without the appropriate supporting infrastructure.
- *"Carrington is a strategic site for the borough. The development of the site and its scale enables it to accommodate large distribution/industrial units and offer the ability for expansion for occupiers whilst working within the current development restrictions on the site".* If this were true, given the proximity of the former railway lines and the Manchester Ship Canal, Carrington would have sustainable freight transport in place already, with improvements being proposed for each major development – yet there are **ZERO** proposals for sustainable freight transport options from either developers or Trafford.

COMMENTARY ON ALTERNATIVE SITES

The applicant makes many points about the issue of alternative sites, but, as mentioned above, given that GM has increased their warehousing land supply by **65%** from the baseline need (including releasing Green Belt), to provide the land to meet GM's requirements, it is astounding that the Market Update Report by JLL identified "a very limited supply of sites that can accommodate units in excess of 23,234 sq m".

It is clear from the Strategic Employment Land Availability Assessments for the 9 boroughs involved in Places for Everyone that there are both brownfield and Green Belt sites suitable for developments of this size and scale, none of which would require the destruction of a site of biological importance.



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

COMMENTARY ON CONSIDERATION OF PLACES FOR EVERYONE

The applicant uses the Secretary of State's decision in relation to the West of Wingates site in Bolton as the reason for making the Places for Everyone evidence base a material consideration. Once again, the applicant has been extremely selective in their commentary as

- the West of Wingates site was not a site of biological importance
- it is clear that Places for Everyone significantly overstates employment land needs. Nicol Economics advised in their Note on Employment Land needs in Greater Manchester (para. 5.9; document 15 in the GMSF 2020 evidence base) that "*A combined need and supply margin of 50% falls well outside the bounds of what has been generally used elsewhere (up to around 25% or at most 5 years of supply)*".
- in the version of the plan being referenced, the Gross Need figure (set out in document 05.01.02) was 2,534,000, to which a 31% flexibility margin was applied to create the Policy JP-J4 target of 3,330,000. The Baseline Supply was 1,805,509, to which the Allocations were then added bringing the total supply (including post 2037 allocations) to 4,438,182 – meaning that a buffer of 75% had been added to the Gross Need figure! The latest version of the plan adds a further year to the plan period which reduces that buffer to **65%**. This figure is still much greater than the 21% referred to by the applicant!

The applicant's letter incorrectly states that "*New Carrington is the only allocation in the plan with its own specific strategic policy: JP-Strat 11*". As an example, Port Salford (which proposes significant warehousing space) also has its own policy in the plan (JP-Strat 4). The applicant makes no reference to the importance of Stockport and Manchester to the strategy to sustain southern competitiveness. If New Carrington is "*fundamental*" to that strategy, it should have sufficient sustainable freight transport infrastructure in place to support it and the applicant should be supporting such a transport solution. There are no sustainable freight transport solutions today and none are listed in Appendix D of the Places for Everyone Plan (Necessary Transport Interventions).

Given the existing land use, it is interesting that the applicant has not drawn attention to the Greener Places policies in the Places for Everyone Plan, such as JP-G2, JP-G7 and JP-G9.

As an example, JP-G7 (Trees and Woodland) requires (criterion 12) that "*Where development would result in the loss of existing trees, requiring replacement on the basis of two new trees for each tree lost, or other measures that would also result in a net enhancement in the character and quality of the treescape and biodiversity value in the local area, with a preference for on-site provision*"

Furthermore, there are protective policies within JPA 33, the New Carrington allocation. Whilst the modifications for criterion 32 have significantly weakened the policy, it still requires developers to take account of the local sites of biological importance in accordance with JP-G9, which requires that (criterion 4) enhancement of biodiversity resources will be sought by "*Protecting sites designated for their nature conservation and/or geological importance*".



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COMMENTARY ON CONSIDERATION OF TRAFFORD'S CORE STRATEGY

If this development is considered under the policies in the current Local Plan, given the proximity of the Manchester Ship Canal and the former railway lines and the level of HGV traffic that the scheme will generate, more focus should be given to the paragraphs in the Core Strategy that highlight the importance of sustainable freight transport options. As an example, the plan confirms that (I3.2) *"National guidance seeks to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices both for carrying people and for moving freight"* and paragraph I3.16 highlights that *"Better utilisation of railways, ports and shipping services has a vital role to play in building a sustainable distribution system. When intensively used, railways can offer a substantially more energy-efficient means of distribution"*, with paragraph I3.18 stating *"The promotion of the Manchester Ship Canal as a sustainable transport route is consistent with national guidance regarding the protection, improvement and development of the water transport network. The enhanced role of inland waterways for freight distribution will have positive environmental benefits, in particular in terms of climate change"*.

Yet, the applicant has been very selective when quoting from the Core Strategy, which also states:

- *Policy SL5 "Significant improvements to public transport infrastructure by improving access to Partington, the Regional Centre and Altrincham with links to the Metrolink system"* – these have not been delivered by previous developments nor will they be provided by this scheme
- *Policy SL5.4 "The protection and enhancement of the sites of nature conservation and biological importance"*
- *Policy L4.1 "To facilitate the Delivery Strategy, the Council will promote the development and maintenance of a sustainable integrated transport network that is accessible and offers a choice of modes of travel to all sectors of the local community and visitors to the Borough by:*
..... (e) *Ensuring that, as appropriate, development proposals within less sustainable locations throughout the Borough, including sites within the Strategic Locations of Carrington*
..... *will deliver, or significantly contribute towards the delivery of, measures to secure infrastructure and services that will improve access to more sustainable transport choices;* (f) *Any necessary public transport, highways or freight schemes required for each phase of the development should be in place before first occupation of that phase"*

Trafford has failed to ensure that appropriate sustainable freight transport options have been provided, despite the huge level of warehousing development that has already been approved in Carrington – no further development should be given approval until sustainable freight options are available

- *Policy L4.11 also suggests that Trafford will safeguard and promote the improvement of: "The Manchester Ship Canal as a sustainable transport route where this does not conflict with any other policy of the Development Plan for Trafford"* – given Carrington's position, adjacent to the Manchester Ship Canal, it is wholly irrational and unreasonable that Trafford has not insisted on the use of sustainable freight transport options for this and previous developments.

The Core Strategy also highlights the importance of protecting and enhancing existing and potential sites of nature conservation value, with policy R3.1 stating that the Council will *"Protect and connect existing and potential sites of nature conservation value and historic landscape features, and seek to create new wildlife habitats as recommended in the GM Ecological Framework"* and that it will *"Protect and provide appropriate natural space to connect landscapes and allow wildlife to move through them to adapt to climate change"*.

Policy R2 (Natural Environment), which recognises the borough's assets includes its sites of biological importance, should also be addressed. The landscape impacts of this development are significant and, given the lowland mossland characteristics, a warehouse of this size and scale will be visible for miles. The impact on the area surrounding the development site will be considerable.

Paragraph 8.67 (page 80) of the Core Strategy states that the Carrington location will *"provide a range of employment opportunities"*, not just the warehousing that is currently being proposed.



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COMMENTARY ON TRANSPORT OPTIONS

If Trafford wishes to transform Carrington into a strategic site, for large scale industrial and warehousing units, then it must require sustainable freight transport options as a condition of development. Approving such schemes without appropriate sustainable freight transport options leaves residents at risk of a surge in incidents related to chronic health conditions, road traffic accidents and mental health episodes due to the huge increase in air, noise, light, vibration and water pollution.

In their letter, the applicant focuses on the benefits of the scheme to the Carrington Relief Road but the contribution proposed is a drop in the ocean, especially when considering the daily increase in the number of HGVs to be travelling on local roads and the lack of sustainable transport options being proposed.

The commentary from TfGM in relation to the CRR should be given a high level of weighting:

"The TA reports that the proposed development is likely to be part operational prior to the completion of the proposed Carrington Relief Road (CRR). It should be highlighted that there are no definite timescales for the implementation of the CRR, given it will need to be progressed through the planning process to gain planning approval. As such the use of the CRR should not be relied upon as its implementation at present cannot be guaranteed."

The proposed development will significantly increase vehicle movements along Isherwood Road and onto the surrounding highway network and at present there is no guaranteed mitigation in place or proposed to support this development".

The commentary from TfGM relating to Public Transport should also be given a high level of weighting:

"As per previous comments for Application 88439/HYB/16, the same issues remain for this site in that there is no provision within the application for "substantial improvements to public transport" despite this being a requirement in the Core Strategy."

The site is currently not particularly well served by public transport with the nearest bus stop located on Manchester Road, around an 8-minute walk from the site. These bus stops offer access to half hourly Monday – Saturday services between Altrincham and the Trafford Centre and between Manchester and Partington. A half hourly service to either Altrincham; the Trafford Centre; or Manchester is not considered to represent an attractive alternative to commuting by car or to accessing the site by car for employees. Whilst future employees of the proposed development will therefore have some access to a choice of travel mode, without further incentives or service improvements, the choice of public transport services on offer are unlikely to significantly reduce the amount of car travel generated by this development".

COMMENTARY ON TRAFFORD'S ENHANCED BIODIVERSITY DUTY

Councils now have an [enhanced biodiversity duty](#), which requires them to consider how they can conserve and enhance biodiversity. This strengthened "biodiversity duty", introduced by the Environment Act 2021, means that Trafford must place greater weight than they may previously have done on the impact of development on ecology and biodiversity.

The Government has set out clear national goals and targets on this topic and to support the achievement of the targets, Local Authorities must ensure the actions they take, including in approving planning applications that are likely to have a significant impact on ecology and biodiversity, are consistent with the Government's goals.

Areas of high biodiversity value, such as this site, should be given priority and weight in the decision-making process relating to land uses and whether the proposals made cause serious harms. Nature-based solutions, including for carbon capture and sequestration, the restoration of natural processes and landscape recovery should be promoted and encouraged.



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The [guidance](#) explicitly mentions enhancing protected sites, including local nature reserves and local sites.

In addition, the [Government's guidance on protected species](#), for example, suggests that, to avoid harming or disturbing protected species, proposals could [reduce the size of the development](#) or alter its layout to retain the site's important habitat features! This does not appear to have been considered.