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New Carrington Justification



Introduction

This document assesses the planning inspectors' statement in relation to the New Carrington allocation, that *"The allocation was found sound at examination on the basis that, in principle, the public benefit arising from the development proposed would be likely to clearly outweigh the loss or deterioration of an irreplaceable habitat and that a suitable compensation strategy was capable of being delivered. The policy seeks to ensure that detailed development proposals are consistent with that conclusion"*.

In finding that the *"public benefit arising from the development proposed would be likely to clearly outweigh the loss or deterioration of an irreplaceable habitat"*, we do not believe the planning inspectors have taken all the relevant evidence into consideration. We are particularly concerned that the planning inspectors gave too much weight to the supposed "benefits" of allocation and did not give sufficient weighting to the irreversible impact to the huge body of deep peat within the allocation boundary and other environmental effects. Nor, given the lack of a preliminary ecological appraisal, did they request sufficient evidence to enable them to do so.

Furthermore, in finding that *"a suitable compensation strategy was capable of being delivered"*, we do not believe the planning inspectors have given sufficient consideration to the size and scale of the damage to be caused to a 335 hectare deep peat mass, nor (given the level of development to be agreed) to the lack of suitable space within the remaining allocation area for such a compensation strategy to be implemented. In addition, the principles of the *"suitable compensation strategy"* have **NOT** been defined within the plan. Leaving such an important element of the policy to be negotiated when planning applications come forward will result in piecemeal, inappropriate solutions that set irresponsible precedents.

In addition, the proposals in allocation JPA33 will **NOT** result in sustainable development, the key reasons are summarised in the table below and discussed in the following paragraphs.

Criteria	Level of Benefit	Comments	Criteria	Level of Harm	Comments
Provision of Housing	Low	Trafford can meet the government's overstated housing need figure (for years 1-15) via its Existing Land Supply (a 20% buffer has been added to the supply for the whole plan period) Trafford also has significant windfall on an annual basis (over 1,000 units per year) c1,200 homes (24% of the proposed development) already have planning approval Alternative sites with lower environmental or amenity value were not considered	Harm to Green Belt Purposes	Very High	GM's Stage 2 GB Assessment report (07.01.10) assesses the overall impact to be Very High (p103) Green Belt will be released on the day the plan is adopted, directly contradicting PTE Objectives 2 and 3 ("Prioritise the use of brownfield land")
Provision of Affordable Housing	Very Low	Trafford has an "acute" housing crisis, yet this allocation is required to deliver only 15% - alternative sites may be able to deliver much more affordable housing 15% equates to less than 600 affordable homes over 17 years (as only the allocation areas that do not already have planning approval must comply with the policies in this plan)	Harm to Peat Moss	Very High	Loss/destruction of a huge peatland area (Natural England state 335ha) No principles defined for a suitable/deliverable compensation strategy - will lead to a piecemeal, inappropriate solutions as planning applications come forward Natural England identified that there is deep peat, capable of restoration and that development would be extremely damaging to whole peat mass Extensive drainage will be required for development of roads, housing and warehousing Peat is a very cost-effective way of sequestering carbon and supports achievement of 2038 carbon neutral target Government is committed to the preservation and restoration of England's peatlands
Provision of Jobs	Very Low	GM uses a flawed methodology for calculating employment land needs and has unnecessarily uplifted requirements with an excessive 65% buffer to necessitate Green Belt release (non-compliant with the guidance of their own expert) 255,000 m2 (74% of the proposed development) already has planning approval The Green Belt location is unable to support the large-scale logistics units required by GM Alternative sites with lower environmental or amenity value were not considered Lack of diversity in job opportunities	Harm to other Natural Capital Assets	Very High	Harm to Manchester Mosses SAC due to levels of additional traffic, including HGVs Lack of ecological evidence - there is no Preliminary Ecological Appraisal Significant weakening of policies and lack of clarity within policy about action required where harm occurs NPPF 153 explicitly requires a "proactive approach to mitigating & adapting to climate change" - the allocation of peatmoss, Grade 2 agricultural land, woodland & wetland is contrary to that requirement The allocation results in extensive loss of water capture and storage areas (will increase risk of local flooding), huge levels of carbon emissions, inadequate mitigation opportunities, loss of Grade 2 agricultural land (reducing local food production capability that has a low carbon footprint) SBI within the allocation area proposed for development Loss of thousands of trees, significant loss of hedges and wet woodland Will cause population decline for red listed birds and endangered/protected species Total lack of consideration of the rural economy in the Plan
Provision of sustainable transport options	Low	Site is currently described as isolated, poorly served by public transport No commitment or funding to deliver active travel or sustainable passenger transport (checked via FOI request) - huge over-reliance on car use (residents and employees) Zero aspirations or commitment to sustainable freight transport options (despite huge volume of HGV traffic to be generated by this development)	Harm to other Natural Capital Assets	High	Impacts to Health and Wellbeing: <ul style="list-style-type: none">• Huge levels of air, noise, light, vibration and water pollution caused by lack of sustainable transport (and significant weakening of previous Local Plan policies)• Potential challenges with evacuation of both residents & employees if there is an issue at one of the many hazardous businesses in Carrington• Much of remaining Green Belt is not publicly accessible Impacts to Heritage Assets, such as: <ul style="list-style-type: none">• Carrington Rides• Warburton Deer Park• Warburton Village
Provision of Community Amenities (schools, GPs, etc)	Low	Masterplan shows no land set aside for new schools to address the 2,000 school places needed - off-site school places will cause increased traffic, catchment & admission issues School places already a red risk for Trafford The availability of health service facilities to support new communities is uncertain	Harm to Landscape Character	Very High	22m high warehouses proposed - no maximum height defined for warehousing Existing open character of the mosslands will be significantly impacted
Adheres to National, Regional and Local Policies	Very Low	This Allocation does not comply with national policy requirements, including (among others) NPPF 9, 16, 32, 95, 119, 140, 141, 152, 153, 154, 174, 175, 179, 180, 186, the England Peat Action Plan, the Government's 25-Year Environment Plan and Climate Change legislation Trafford's (and GMCA's) enhanced biodiversity duty will not be met The Allocation does not support the delivery of Plan Objectives (2 & 3) to Prioritise the use of brownfield land, nor Plan Objectives 5, 6, 7, 8, 9 and 10 There is no evidence that land with the least amenity value has been allocated No information is provided about the impact on (for example) the rural economy, there is no Preliminary Ecological Appraisal setting out the impact of the development, there is no detail about the impact of the development on the achievement of the Carbon Neutral Target 2038 The Plan ignores the advice of Natural England There is a lack of commitment to peatland restoration			
Viability	Low	Viability is Marginal at best The costs related to the full list of Necessary Transport Interventions at Appendix D have not been included in the Viability assessment			

This document concludes that the New Carrington allocation, as currently proposed, is not positively prepared, is ineffective, unjustified and not compliant with national policies. It is, therefore, unsound and the planning inspector's main modifications do not make it sound.

We have set out why we disagree with the planning inspectors' conclusions in relation to the new paragraph (after 11.321) in our response to MMTr4 and, for ease of reference have included that response under the heading **Consideration of NPPF Paragraph 180(c)** in this document.

New Carrington Justification



Given the issues we raise, we are extremely concerned that future planning applications which propose developments in an approved allocation in PfE will be considered to have met the plan-making criteria. This is patently not the case, particularly in relation to the lack of ecological and other evidence that should have been provided in advance of agreeing to this allocation, which we discuss later in this document.

Background

New Carrington is the largest allocation in PfE and, at 5,000 homes, 350,000 m2 employment space and 4 major new roads, effectively constitutes the development of a new town. It will dwarf the existing Partington township (which currently comprises around 3,300 households) and will result in the need for over 2,000 additional school places.

Some of the allocation area is previously developed land and already has planning approval (circa 1,200 housing units and 250,000m2 employment space). This means that the policies in this PfE plan cannot influence the developments in those areas, the level of affordable housing to be provided, for example, the density to be achieved, or the “use type” for employment development. We also note that Mandatory Biodiversity Net Gain (BNG) will only apply to new applications for planning permission made after the implementation date, with major developments in England required to deliver 10% BNG from January 2024 and BNG for small sites will be applicable from April 2024 (per Joanna Averley letter 6th October 2023).

At the heart of the New Carrington allocation is a 335 hectare peat moss, which Natural England considers (OD42) to be an irreplaceable habitat, capable of restoration. One of the key policies in the [Government's Net Zero Strategy](#) is to restore approximately 280,000 hectares of peat in England by 2050. The [England Peat Action Plan](#) recognises the many ecosystem services and functions performed by these valuable natural capital assets, stating that they are “*our largest terrestrial carbon store, a haven for rare wildlife, a record of our past, and natural providers of water regulation*”. Greater Manchester's own modelling (OD36) identifies that 50-75% of GM's peatlands need to be restored to deliver the 2038 Carbon Neutral Target. PfE repeatedly states that it is focused on delivering the ambitions of the Greater Manchester Strategy, which highlights that the most pressing issues for the city-region are “**responding to the interconnected challenges of climate change and inequality**”, that GM needs “**to act quickly on decarbonisation**” and that the “**refreshed Greater Manchester Strategy therefore puts the climate and equalities agendas at its heart**”. Destroying or damaging the extensive peat mass at Carrington Moss would be contrary to all those aims.

With the size and scale of the development in mind, the impact on existing communities will be immense, and detailed evidence should have been fully scrutinised by Trafford and the GMCA, both in advance of the decision to allocate sites and prior to each consultation with the public. Yet, as discussed below, there is, among many other omissions, no preliminary ecological appraisal.

Trafford's [recent report to the Executive](#) requesting approval to move into the Modifications Consultation phase suggested that PfE “*will provide the overall strategic planning context for Development Management and the Trafford Local Plan, which will contribute to all of the Council's Corporate Priorities, in particular addressing our climate crisis*”.

This is astounding and demonstrates a huge lack of understanding by the political leadership given that the New Carrington development will destroy or significantly damage:

- a peat moss (a rare and unique habitat, capable of recovery to sequester carbon)
- Grade 2 agricultural land (growing wheat, potatoes, carrots and other staple foods which would provide food security at a low carbon footprint via local produce for both humans and animals)
- wetlands (capable of soaking up huge volumes of water), the deterioration of which could cause future local flooding
- woodland (extensive areas, thousands of trees, will be felled as a consequence of this plan) again impacting Trafford's (and GM's) ability to meet its carbon neutral ambitions

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- important habitats supporting red listed birds and endangered/protected wildlife (putting their populations at greater risk of extinction).

Given that the allocation will also significantly increase air, noise, light, vibration and water pollution and, of course, carbon emissions, we believe it will comprehensively undermine Trafford's climate crisis goals. In fact, it will extensively and negatively impact the achievement of Trafford's Carbon Neutral Action Plan and GM's 2038 Carbon Neutral target.

The Executive also stated (paragraph 2.1.10 of [Trafford's Budget Report](#), 15th November 2023), "*It is essential that the Council does not lose sight of our **key ambition and objectives for 2024/25 and beyond** and the budget proposals remain closely aligned to these. These include:- → **Implementing the carbon neutral framework action plan and Clean Air Plan to deliver net zero emissions, and with the other GM authorities and the GMCA undertake the activities required to implement the clean air plan, improving air quality across the Borough***". It is clear that this allocation will not support the delivery of any of those objectives.

Furthermore, whilst Trafford Councillors suggest that sites of biological importance (SBIs), sites of special scientific interest (SSSIs) and other protected sites "*have been excluded from the development areas and will be protected*", these sites will be severely impacted by the drainage, the human footfall, domestic pet activities, and the extensive pollution. We also mention elsewhere in our response that a landowner wishes to completely fell a whole woodland SBI, within the allocation area, and replace it with a 22m high warehouse (planning application 109755), demonstrating that these ecologically valuable sites are **NOT** protected within JPA33.

For clarity, in relation to the government's position, they stated ([response to local housing need proposals in "Changes to the current planning system"](#)), April 2021, that "*Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt*".

The government has reinforced their views in the [government response to reforms to national planning policy report](#) (November 2023) with the confirmation that "*This government is committed to protecting and enhancing the Green Belt. National planning policy includes strong protections for Green Belt land, and this policy will remain firmly in place. National planning policy is also clear that local authorities should make as much use as possible of brownfield land, reducing the pressure to consider greenfield sites, and the government is providing significant financial support for the take-up and completion of brownfield redevelopment. In our recent consultation on our proposed approach to updating the National Planning Policy Framework, we proposed to strengthen Green Belt policy by making clear that local authorities are not required to review Green Belt boundaries to meet housing needs. We are analysing responses to the consultation and expect to publish a response later this year*".

The government's position should be taken into account by the planning inspectors when considering whether Green Belt release is necessary and sound.

Consideration of NPPF Paragraph 180(c)

Following the Hearings and a review of all the evidence submitted, the planning inspectors stated, in relation to the New Carrington allocation, that "*The allocation would make a very significant contribution to Trafford's housing and employment needs, as well as contributing to the strategy of sustaining the competitiveness of the southern areas*".

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We disagree and, in making this statement, we do not believe the planning inspectors have taken all the relevant evidence into consideration. We are particularly concerned that the planning inspectors gave an inexplicably high weighting to the amount of market housing and warehousing proposed and did not give sufficient weighting to the government's commitment to protecting and enhancing the Green Belt, to the climate mitigation requirements, nor to the vast peat extent and, therefore, to the huge, irreversible impact to be caused by the proposed development.

We note, for example, that, to be found sound, the NPPF (paragraph 68) only requires sufficient land supply to be identified for the first 15 years of the plan, not for the whole plan period. In addition, national policy (paragraph 74) only requires a buffer to be added to the 5-year figure, not the whole of the land supply. In the first 15 years of the plan, Trafford is able to meet its government housing need figure, without releasing Green Belt. There is a buffer of over 20% applied to its 17-year figure, which includes the allocations.

Furthermore, PfE does not take large/medium windfall into account, despite acknowledging that such sites will continue to come forward. Windfall is estimated to account for over 10,000 units per annum across the plan area and over 1,000 units per annum for Trafford. The Legal Implications section below discusses this issue in more detail.

NPPF paragraph 31 states that the *"preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals"* and the [Guide for Local Plan Examinations](#) suggests (paragraph 1.12) that evidence base documents *"should be updated as necessary to incorporate the most recent available information"*.

Whilst accepting that the GMCA has followed the government's standard methodology, the planning inspectors should have taken the Census 2021 data into consideration when assessing housing need. Their evaluation should have reflected the verification (demonstrated in several iterations of ONS data) that population growth expectations have fallen considerably since the government's 2014-based dataset was produced.

As an example, at a Greater Manchester level, GM's household growth figure for 2021 was projected to be 100,626 in 2014 - the Census actual was **50,034** (only 50% of the figure projected in 2014). For Trafford, the over-statement of housing need is even more stark. The household growth figure for 2021 was projected to be 10,040 in 2014 – the Census actual was **1,816** (only 18% of the figure projected in 2014).

In addition, SHLAAs have been submitted by each district in the plan area, the total of these lists of previously developed land exceeds the government's housing need figure. Planning Practice Guidance states that such data should identify *"a future supply of land which is suitable, available and achievable for housing and economic development"* (PPG: paragraph: 001 Reference ID: 3-001-20190722).

The plan is, therefore, able to meet its *"significant flexibility allowance"* (paragraph 7.16) and to deliver *"balanced and inclusive growth, thereby achieving the overall spatial strategy"* (paragraph 7.12) from within existing land supply, without releasing any Green Belt.

Furthermore, Greater Manchester has received significant public monies, including under [GM's deeper devolution deal](#), to regenerate brownfield land.

This should enable that *"suitable, available and achievable"* existing land supply, which exceeds the government's over-stated housing need figure, to deliver Plan Objectives 2 and 3 (*"Prioritise the use of brownfield land"*), rather than unnecessarily releasing environmentally-rich Green Belt for development on the day the plan is adopted.

The following should also have been taken into consideration:

- the brownfield land within the allocation area that **already has planning approval** (see below) delivers a significant proportion of the proposed development contradicting the assertion that the *"allocation would make a very significant contribution to Trafford's housing and employment needs"*



- the minimum Affordable Housing requirement for the allocation is extremely low at just 15% (much lower than Timperley Wedge, for example, at 45%) and can only be enforced in the allocation areas where planning approval has not yet been given
- warehousing land supply estimates use a flawed methodology which does not take into consideration the negative net demand for B1 & B2 floorspace (a figure that exceeded the positive net demand for B8 storage), this figure should have been incorporated within the land requirement calculations
- in addition, Greater Manchester has added a 65% buffer to the warehousing land supply (a calculation that *"falls well outside the bounds of what has been generally used elsewhere"* according to the GMCA's own expert evidence – see paragraph 5.9; document 15, GMSF 2020)
- a recent planning application (109755) confirmed that the Green Belt land at New Carrington cannot support the size of warehousing development required in Greater Manchester.

We have repeatedly been told, throughout the spatial planning process, including in relation to the evidence we have submitted, that the plan should be considered *"as a whole"*. So, it is also incongruous that Trafford's specific housing and employment needs are given so much weight in this decision. Nevertheless, we believe the paragraphs above demonstrate that the Green Belt land in New Carrington does **NOT** materially impact either Trafford's housing and employment needs, nor the strategy of sustaining the competitiveness of the southern areas.

In addition, the data demonstrates that the initial criteria set out in the Site Selection paper (03.04.01, page 14) *"Where a single district has sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt"* has been met, that Green Belt should not have been released in Trafford and that the case for exceptional circumstances that result in the release of Green Belt has not been made.

Given that GM's ability to exceed the government's housing need figure already provides a huge *"flexibility allowance"* within existing housing land supply (without the release of Green Belt) and that the warehousing land supply has been inflated beyond accepted good practice, the planning inspectors should have given much more weight to the loss or deterioration of 335 hectares (a huge area) of peatmoss, Grade 2 agricultural land, woodland and wetland habitats.

The planning inspectors go on to say that the allocation would *"also involve substantial regeneration of previously developed land, bringing with it associated social and environmental benefits. This is all consistent with the strategic objectives set out in policies JP-Strat9 and JP-Strat11"*.

It is true that the allocation includes a significant area of brownfield land that is expected to support the regeneration of Carrington and Partington. That brownfield land delivers a significant proportion of the allocation's housing and employment requirements (approximately 1,200 of the 5,000 dwellings and 250,000 m2 of the 350,000 m2 employment space). That brownfield land, however, already has planning permission and those developments are **NOT** required to comply with the strategic objectives or the policies in this plan. PfE cannot, therefore, determine the level of affordable housing or density to be delivered, nor, for example, the "use type" for employment purposes.

It is clear that, whether or not the Green Belt components of this allocation are progressed, the *"substantial regeneration"* should be delivered by those approved brownfield developments, many of which have either already commenced construction or are completed. This issue should not, therefore, have been considered material when making the decision about JPA33.

The planning inspectors went on to assert that *"The wholly exceptional reasons required by paragraph 180c are therefore also met in this case"*. We disagree. There is nothing *"wholly exceptional"* about delivering the public benefits of development that already has planning approval, is already in place and for which the public benefits were tested elsewhere, some time ago.

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In addition, the NPPF makes it quite clear that those “*wholly exceptional reasons*” would be for developments such as “*infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills)*”. This is not what is being considered at New Carrington, there are no plans to, for example, introduce sustainable freight transport, which might be considered to fall within the bounds of those criteria.

Furthermore, Natural England (NE) wrote to the planning inspectors in June 2023 (OD42), providing insights in advance of the specific peat Hearing on 5th July. NE mentioned, in relation to compliance with paragraph 180(c), that there is extensive and restorable deep peat within allocation JPA33, that the deep peat should be considered to be an irreplaceable habitat, and that, “*at JPA33 the combination of the location and the extent of development proposed by the allocation policy means the proposed development is incompatible with avoiding the deterioration of this irreplaceable habitat*”.

NE highlighted that there were differences in the views of those involved in the Statement of Common Ground about the extent of the restorable deep peat within the New Carrington allocation boundary. NE believe there is c335 hectares of restorable deep peat on the site, of which 105 hectares are proposed for development. This is a huge area of irreplaceable habitat that is at risk of deterioration or complete loss and should have been given significant weight in considering whether the “*wholly exceptional reasons*” had been met.

NE’s view, set out in OD23, is that the development will not only prevent future restoration but “*will cause irreversible damage to the body of peat directly under the developed land and the wider peat mass, which depends on the continuity of the flow of water*”. They go on to recognise that the degradation of the peat mass will also result in significant greenhouse gas emissions.

NE confirmed (in OD42) that their position is in line with the England Peat Action Plan, that there should be no development on (restorable) deep peat, and that peat should be kept wet and in the ground. NE drew attention to their “*extensive experience of peatland restoration projects*” which provides considerable credibility to their professional judgement in this matter.

We, therefore, disagree that the “*wholly exceptions reasons*” required by paragraph 180(c) have been met.

The planning inspectors went on to state that “*There is also a reasonable prospect of a suitable compensation strategy being able to be delivered within the allocation as a whole and that the policy can be modified to be effective in ensuring this is delivered*”.

The PPG (paragraph: 033 Reference ID: 8-033-20190721) states that when assessing whether ‘*wholly exceptional reasons*’ exist that may justify a loss or deterioration of, in their example, ancient woodland, ancient trees or veteran trees, “*it will not be appropriate to take any compensation measures into account. These should be considered only once the existence of ‘wholly exceptional circumstances’ has been ascertained*”.

So, the issue of whether or not there is a “*reasonable prospect of a suitable compensation strategy being able to be delivered*” should be immaterial to the consideration of the public benefit to be delivered by the scheme.

Furthermore, [DEFRA has stated](#), in relation to irreplaceable habitats, that the “*planning authority must be satisfied that as a minimum, the compensation plan meets requirements in relevant policy and guidance and delivers appropriate compensation which **should aim to reflect the same type of habitat that was lost***” and that the “*legislation will also set out that off-site biodiversity units and statutory biodiversity credits cannot be used to compensate for the loss of irreplaceable habitat*”. For New Carrington, the loss of, or damage to, circa 335 hectares of peatland, a huge area to compensate for, especially given that, as highlighted by Natural England at the peat Hearing, peat can only be generated on a peatland base.

In addition, if the level of Green Belt release is approved as currently proposed, much of the remaining area of peatland is not accessible for compensation options (the land is privately owned and used or rented by, for example, sports clubs (Manchester United, Sale Sharks, Sale Rugby FC), United Utilities, the Solar Farm, National Grid, riding centres and other farms).

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Furthermore, Appendix D sets out a number of “*Necessary Transport Interventions*”, including 4 major new roads that will be constructed on, across and around the peat moss, not only appropriating considerable land areas, but also requiring significant drainage (which will extensively impact the remaining mossland) and substantial tree-felling (to be replaced on a 2:1 basis in compliance with JP-G7) to make way for their routes.

The SBIs and SSSIs on and around Carrington Moss will be significantly impacted by the proposed development of housing, warehousing and roads, including as a consequence of:

- drainage and other changes to hydrology to enable the development
- increased human and domestic pet footfall
- increased air, noise, light, vibration and water pollution
- loss of trees, vegetation and wetland habitats.

All-in-all, this suggests that, given the size and scale of the development, the lack of land available for delivery of a suitable compensation strategy within the allocation area and the damage to be caused, not only to the peat mass, but also to trees and woodlands and the SBIs/SSSIs, the required level of mitigation and compensation will be extremely high, so the “*reasonable prospect*”, suggested by the planning inspectors is unlikely to be deliverable.

In addition, the planning inspectors do not determine what the principles of a “*suitable compensation strategy*” for the loss or deterioration of such a huge expanse of peat moss would comprise and there is no indication of how or whether the loss of restoration potential and carbon sequestration opportunities should be taken into consideration. Such a critical issue should not be left to negotiation when planning applications come forward, as this will result in piecemeal, inappropriate solutions that set irresponsible precedents.

For the reasons set out above, we, therefore, believe that the planning inspectors were incorrect to suggest that the allocation meets the requirements of paragraph 180(c), that the allocation is not consistent with national policy, that it is unjustified and ineffective and, therefore, unsound.

Lack of Ecological Evidence

PfE has not taken a consistent approach to assessing ecological/biodiversity assets across the allocation sites, with the supporting documents for some sites, including New Carrington, devoid of any ecological evidence. There is, therefore, no data to determine that Carrington Moss has “*limited ecological value*” (PfE paragraph 8.30).

Whilst the NPPF and the PPG do not refer to specific guidelines, it would be impossible to determine whether wildlife legislation would be breached without a robust ecological appraisal. Without substantiation, consistency with national policy cannot be confirmed, making the allocation unsound.

In January 2023, the planning inspectors requested (IN24) that the GMCA advise what they consider to be relevant, up-to-date, adequate and proportionate evidence on ecology to inform the choice of allocations and the contents of site allocations policies in local plans. The inspectors asked that the GMCA response had regard to NPPF, PPG and any other relevant national policy/guidance as well as advice from relevant professional bodies. The planning inspectors then invited representations (IN28) to be made in relation to the GMCA’s response ([GMCA43](#)).

We do not believe the planning inspectors gave sufficient weight to the feedback provided on this issue by the Friends of Carrington Moss (including on behalf of the Save Greater Manchester’s Green Belt Group), nor that given by professional organisations, such as the Wildlife Trusts.

Our review of the GMCA’s response highlighted omissions, inconsistencies and factually incorrect data, including, for example:

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- Points 1, 2 and 3 of GMCA43 referenced Circular 06/2005, but the GMCA did not mention paragraph 84¹, which should have been given significant weight when determining whether the evidence provided is relevant, up-to-date, adequate and proportionate.
- Point 15, which lists the sources that informed the selection of the allocations, includes the Pilot LNRS. This pilot ran from autumn 2020 to summer 2021, yet many of the PfE allocations, including New Carrington, were included in the 2016 and 2019 consultations, so this initiative cannot have influenced their selection. The list, therefore, lacks credibility.
- Point 16 suggests that “*Ecologists from the GMEU have also carried out site visits to all the proposed PfE allocations and undertaken walkover surveys to assess habitat types, distribution and condition as far as is practicable*”. Yet, there is no record of these visits in the New Carrington allocation evidence base and none can be provided in response to FOI requests.
- The [PPG Natural Environment Guidance](#) paragraph 11 (Reference ID: 8-011-20190721), which sets out the relevant evidence in identifying and mapping local ecological networks, does not appear to have been followed. GMCA43 refers to paragraph 10 (Reference ID: 8-010-20190721), in point 6, but the latest Government policies, including the commitments in the 25 Year Environment Plan and, for example, the England Peat Action Plan, do not appear to have been considered.
- Despite the lack of evidence provided, this PfE plan represents a significant weakening of the policies in Trafford’s existing local plan, which previously gave very strong protection **from** development for the peatmoor, the Grade 2 agricultural land, the woodland and the wetland habitats.

Point 11 of GMCA43 specifically highlights that proportionate evidence for “*a plan such as PfE*” would be a Preliminary Ecological Appraisal (PEA). Points 12, 13 and 14 discuss [CIEEM guidelines](#), the latest version of which is dated 2017 (published in 2018).

Given the submission version of the plan was issued in 2021, updated PEAs should have been produced for all the allocations (in accordance with NPPF paragraph 31) and the 2017 CIEEM guidance should have been followed. We do not accept, as suggested by the GMCA (point 14), that the “*broad principles*” of the 2013 and 2017 guidelines are similar. The 2017 guidelines now mandate field surveys, for example, which have not been done for all allocated sites (including New Carrington). To be clear, a PEA cannot be totally absent or lack the field surveys set out in the CIEEM guidelines and still be broadly in line with those guidelines.

Point 8 of GMCA43 states that the evidence used to comply with NPPF paragraph 175 (allocating land with the least environmental or amenity value) is predominantly information held or prepared by the GMEU. As set out in the Site Selection section below, this assessment did not include any consideration of the Natural England guidance, including that set out in the Natural Environment Topic Paper (07.01.26), paragraphs 3.52 to 3.59, which should have been considered material in determining the allocation of land with the least environmental or amenity value.

Whilst there are, for example, specific reports for [Oldham](#), [Rochdale](#) and [Tameside](#) there is no Preliminary Ecological Appraisal for New Carrington, the largest allocation in the Plan. Furthermore, the [masterplan for New Carrington](#), presented as part of the submission of the PfE plan (10.09.06), confirms (section 1.3, page 6) the Evidence Base documents consulted in preparation of the masterplan. No Preliminary Ecological Appraisal for the allocation area is listed.

In addition, the ecology considerations for the allocation need to be further assessed for the following reasons:

¹ Paragraph 84 of Circular 06/2005 “*The potential effects of a development, on habitats or species listed as priorities in the UK Biodiversity Action Plan (BAP)*”, and by Local Biodiversity Partnerships, together with policies in the England Biodiversity Strategy, are capable of **being a material consideration in the preparation of regional spatial strategies and local development documents and the making of planning decisions**” – our emphasis



- Points 8 and 10 of GMCA43 also highlight that, where considered appropriate, evidence prepared by site promoters has been used to inform the choice of allocations and the contents of site allocation policies. It is inappropriate to make assumptions about an entire allocation site based solely on the outcomes of piecemeal promoter evidence, which typically only cover certain areas of their land. The outcomes of such ecological appraisals are only relevant in the context of the specific area that has been assessed. They cannot be relied upon to inform the likely impacts (including the cumulative effects) of development across an allocation site as a whole.
- In addition, it is essential that such evidence is impartial and independent. Other qualified experts should have been given the opportunity to provide evidence to inform the choice of allocations and the contents of site allocation policies. This could have included, for example, ecologists from the Wildlife Trust.
- Point 18 suggests the “*high-level assessments*”, referred to in point 17, informed the allocation boundaries, the allocation policies and the thematic policies within PfE. The listed aims in point 17 do not include the requirements of NPPF 175, in particular the determination of the land with the least environmental or amenity value. There are no such “*high-level assessments*” for New Carrington.
- Point 19 states that the GMCA has been able to keep the allocation of land with environmental or amenity value to a minimum but there is no evidence that the sites allocated **ARE** those with the “*least environmental or amenity value*”. In fact, there is no evidence that shows why sites were included or excluded on the basis of their environmental, ecological or amenity assets. The evidence underpinning the choice of allocations should be clearly and transparently available within the Examination library, showing which sites were assessed and why they were/were not selected.
- GMCA43 made a general assumption that harm to biodiversity can always be mitigated, without evidence to support this position for some of the allocations, including New Carrington. This is not the case, and it is inappropriate, especially when considering critically endangered species or irreplaceable habitats. This is particularly the case when the presence of, or ecological significance of, protected/priority habitats/species across allocation sites has not been established. The assessments should identify the relative ease of alleviating the potential harm to each impacted species/habitat.

In the absence of ecological assessments informed by surveys it is not possible to:

- Identify ecological constraints that are significant or where mitigation/compensation might not be possible
- Identify important ecological features that could be affected by future development
- Identify cumulative impacts across the plan area, particularly in the context of important populations of mobile species (e.g. S41 NERC 2006 species).

In addition, point 5 of GMCA43 highlighted, in referring to the requirements of Chapter 15 of the NPPF that PfE does not seek to meet the requirements of paragraph 179(a) but that “*Such designations would continue to be made on the district local plan policies’ maps*”. It will be recognised that the sites being allocated for development by PfE, including New Carrington, are ecology-rich Green Belt locations. These sites will **NOT**, therefore, be available for designation in future district local plans, even if they are **currently** the sites within the district boundaries that have the **HIGHEST** environmental or amenity value.

GMCA43 did not reference NPPF paragraph 180c, which the planning inspectors consider should be applied to the allocations because “*national policy expects the planning system to be genuinely plan-led, and for local plans to contain policies that are unambiguous*”. NPPF paragraph 180c is particularly important in the case of New Carrington, as set out in the section above.

The planning inspectors held a specific Hearing on 29th March 2023 to consider GMCA43 and the consequential representations, along with the available evidence. They have concluded, astonishingly, that the lack of relevant, up-to-date, adequate and proportionate ecology evidence in relation to New Carrington was not a reason to find the allocation of this site unsound.

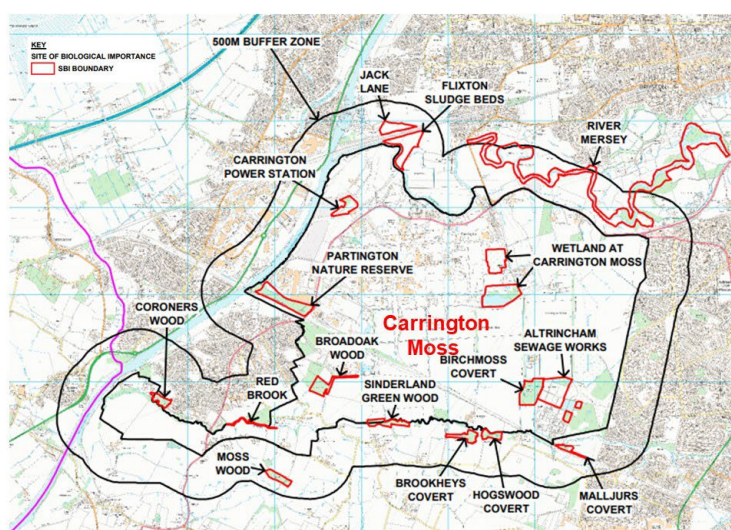
New Carrington Justification

The paragraphs above demonstrate that environmental, ecology and biodiversity issues have not been adequately taken into consideration and that the expectations set out in the NPPF/PPG have not been followed. Given that there is no ecological evidence included in the Submission or the Examination database, nor a sufficient appraisal of the environmental, ecological or biodiversity impact within the Integrated Assessment, to enable a determination that the public benefit of the proposed developments outweighs the cumulative impacts on these assets, we believe the allocation is unsound and should be removed from PfE.

Furthermore, the large number of SBIs and SSSIs on and around Carrington Moss (the centre of the allocation area) will be significantly impacted by the proposed developments of housing, warehousing and roads.

SBIs & SSSIs on and around Carrington Moss

Important, nature-rich habitats that should be preserved



GREATER MANCHESTER ECOLOGY UNIT
ECOLOGICAL SEARCH - SJ 7391
NEW CARRINGTON TR1 - SBI MAP

SCALE 1:30 000

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TAMESIDE MBC LICENCE NO. LA100032687, 2019

The ecology-rich Green Belt land within JPA33 (including the rare and irreplaceable peatland habitat, which sustains a unique range of wildlife and is capable of sequestering huge levels of carbon) should have been allocated for protection and enhancement within Places for Everyone (PfE), especially as the LUC Stage 2 Greater Manchester Green Belt Study (07.01.10, page 103) states that *“Both the settlement gap and boundary strength will be reduced, so the overall impact of the Allocation here will still be very high”*.

Integrated Assessment

We provide our review of the updated Integrated Assessment (IA) elsewhere in our response but, in relation to the updated IA for New Carrington, it is disappointing that the latest version did not address the flaws in the previous IA documentation, rather the process seems to repeat and reaffirm those errors.

In summary, the updated IA did not take into consideration the importance of peat as a natural capital resource, providing many ecosystem services, supporting climate mitigation and, in particular, supporting the achievement of the 2038 Carbon Neutral Target.

Scoring against many of the IA criteria for New Carrington are inexplicably very high, despite the loss of peat moss, Grade 2 agricultural land, woodland and wetland habitats, despite the lack of compliance with national, regional and local policies, and despite Greater Manchester's recognition (OD36) that between 50 and 75 percent of GM's peatland will need to be restored to ensure achievement of the 2038 Carbon Neutral target.



The IA also ignored the issues created by the inclusion of brownfield land that already has planning permission within the allocation (both in terms of the allocation boundary and the volume of residential/employment development). This has resulted in ambiguity and confusion throughout the New Carrington IA, with some assessments being made in relation to sites which are not required to adhere to the policies within this plan.

There are statements in the IA about the allocation which are totally incorrect, assessments based on paragraphs that have been removed from policy, a lack of acknowledgement of the weakening of many of the policies, and no reflection on the limitations of the allocation (very low % of affordable housing, no diversity in employment options, only warehousing/logistics).

These factors mean the IA lacks credibility and integrity, it is ineffective and unjustified and, therefore, unsound.

Site Selection

We raised a number of issues about the site selection process in our original response and at the Hearings but these have not been adequately addressed by the planning inspectors.

The plan evidence base highlights that around *“1,000 individual Call for Sites were submitted for consideration in the GMSF”* (document 03.04.01, paragraph 3.6) and that the *“Draft GMSF 2016 proposed 55 housing and employment allocations which were either in the Green Belt or on protected open land / safeguarded land. The approach to selecting sites in the Draft GMSF 2016 was to focus on a relatively small number of large-scale sites, rather than a greater number of diffuse, smaller sites. These sites were identified following a high level constraints assessment of all the Call for Sites and consideration of the priorities identified in the Greater Manchester Strategy”* (document 03.04.01, paragraph 3.7).

NPPF paragraph 73 confirms that *“The supply of large numbers of new homes can often be best achieved through planning for larger scale development”* but it goes on to state that such sites must be well located *“supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)”*. This is not the case for the PfE allocations, including New Carrington, as explained elsewhere in this response.

The paragraph (NPPF 73) goes on to say that Authorities should work with the support of their communities *“to identify suitable locations for such development where this can help to meet identified needs in a sustainable way”*. Communities were not involved in the identification of these sites and there is resounding evidence that they are not supported by residents.

PfE repeatedly asserts that it is *“focused on delivering the ambitions in the Greater Manchester Strategy”*, which itself states that the most pressing issues for the city-region are **“responding to the interconnected challenges of climate change and inequality”**, that GM needs **“to act quickly on decarbonisation”** and that the **“refreshed Greater Manchester Strategy therefore puts the climate and equalities agendas at its heart”**.

The site selection process, however, did not include any criteria that addressed those *“interconnected challenges”*. In addition, in focusing on a *“relatively small number of large-scale sites”*, the site selection process automatically excluded smaller, more achievable developments, with less environmental impact, in more sustainable locations and that may have supported the actual aims of the Greater Manchester Strategy.

The site selection process also did not ensure land with the least environmental or amenity value was allocated (NPPF paragraph 175), nor did it take into account that GMCA’s own modelling (OD36) confirmed the need to restore 50-75% of peatland to meet the 2038 Carbon Neutral target. In fact, the site selection criteria omitted any reference to ensuring the process supports the plan’s Strategic Objectives 8 and 9. Whilst the Call for Site Assessment (2019 Site Selection Topic Paper) included a planning constraint labelled “High grade agricultural land”, there is no assessment of whether the site incorporated any irreplaceable habitats (including the number of hectares of peat moss).

New Carrington Justification



These omissions have prejudiced the site selection process and undermines critical plan Objectives, including the achievement of the 2038 Carbon Neutral target. In fact, that Call for Site Assessment (2019 Site Selection Topic Paper) related to carbon emissions appears to be limited to the % of the site (based on m2) that is within an Air Quality Management Area. This is not an effective approach to determining the impact on carbon emissions resulting from the allocation of the site.

P4E's Flawed Site Selection Criteria

No criteria to support achievement of objectives 8 or 9?



This table shows how the P4E Site Selection Criteria relate to the P4E Strategic Objectives

Sites should have been selected to support achievement of Strategic Objectives 8 & 9 as well as the others!

Site Selection Criteria ¹	SO1 ²	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10
Criterion 1	X	X	X		X	X	X			
Criterion 2	X		X	X						
Criterion 3	X		X		X					
Criterion 4	X	X					X			
Criterion 5					X					
Criterion 6	X	X				X				
Criterion 7	X	X	X	X	X	X				X

Strategic Objectives

- 1: Meet our housing need
- 2: Create neighbourhoods of choice
- 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester
- 4: Maximise the potential arising from our national and international assets
- 5: Reduce inequalities and improve prosperity
- 6: Promote the sustainable movement of people, goods and information
- 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region
- 8: Improve the quality of our natural environment and access to green spaces
- 9: Ensure access to physical and social infrastructure
- 10: Promote the health and wellbeing of communities

Site Selection Criteria

- Criterion 1 - Land which has been previously developed and/or land which is well served by public transport
- Criterion 2 - Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors (in New Carrington's case, this relates to Port Salford)
- Criterion 3 - Land that can maximise existing economic opportunities which have significant capacity to deliver transformational change and / or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth
- Criterion 4 - Land within 800 metres of a main town centre boundary or 800m from the other town centres' centroids (this is the only criteria Trafford suggest New Carrington does not meet)
- Criterion 5 - Land which would have a direct significant impact on delivering urban regeneration
- Criterion 6 - Land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long-term viable sustainable travel options and delivers significant wider community benefits
- Criterion 7 - Delivers significant local benefits by addressing a major local problem/issue - yet the major local problem/issue for New Carrington is the number of HGVs on our roads, so this should have been address by sustainable freight transport options.

Furthermore, if the IA for JPS2, for example, had included peatland restoration as one of its assessment criteria, this would have played a crucial role in the site selection process. In fact, the IA does not support the judgement related to site selection, or sites being retained within the plan following Examination, because it does not expose the harm to the 2038 Carbon Neutral Target by proposing to develop on deep peat, despite the introduction of OD36, the supposed consideration of the England Peat Action Plan (02.01.01) and other analysis available to the GMCA.

Within the evidence base, the P4E Green Belt Topic Paper and Exceptional Circumstances document (07.01.25) states (paragraph 38) that *"The releases bring forward a set of strategic allocations in the Green Belt in sustainable locations that accord with a rigorous site selection process"*.

Trafford confirms that New Carrington is not currently a sustainable location and it appears that locations were removed from the allocations list for Political reasons, rather than as a consequence of a *"rigorous site selection process"*. The response to an [FOI request](#) about Flixton Green Belt (previously allocation WG4), for example, reveals that this site was removed because the Labour Party in Trafford made the following pledge, in advance of being elected, *"16. We will scrap plans for house building on Flixton's Green Belt"*.

The FOI response continued to highlight that there are numerous articles setting out the intentions of the Party if they were to take control of the Council, which they did in May 2018. The FOI then confirms that the *"decision to approve the 2019 version of GMSF for public consultation – which did not include the Flixton allocation WG4; was taken on 11 January 2019 by the Greater Manchester Combined Authority (GMCA)/Association of Greater Manchester Authorities (AGMA) Executive Board"*.

In addition, by combining two criteria which are not mutually exclusive into criterion 1 (*"Land which has been previously developed and/or land which is well served by public transport"*) weakens the site selection process, making it inadequate and unsound.

New Carrington Justification



In New Carrington's case, for example, it is acknowledged that the area is poorly served by public transport. Almost all of the previously developed land within the allocation boundary already has planning permission, so is not required to adhere to the policies in this plan and should not have been considered as part of the site selection assessment. The Green Belt components of this allocation do not meet any aspect of the criterion and, as we set out in our original response (page 134), the other criteria that New Carrington is supposed to meet are, at best, misleading.

All in all, there is inadequate reasoning to demonstrate why other locations were rejected in favour of sites with deep peat, such as New Carrington, particularly given their importance to meeting the 2038 Carbon Neutral Target.

The site suitability assessment criteria also demonstrate that it is anomalous, given the number of sites originally included within the site selection process, that a location such as New Carrington was considered to be a site with the *"least environmental or amenity value"*.

Site Suitability Criteria

New Carrington Proposal



It is hard to understand why a site with so much red on the table would be chosen!

Site Suitability Criteria:

- 1 – Connectivity and Accessibility
- 2 – Transport Infrastructure Capacity
- 3 – Deprivation
- 4 – Health and Wellbeing
- 5 – Social Infrastructure Access
- 6 – Efficient Patterns of movement
- 7 – Air Quality
- 8 – Biodiversity and Green Infrastructure
- 9 – Flood Risk
- 10 – Water Resources
- 11 – Landscape and Heritage
- 12 – Land Resources

Call For Site	SS 1	SS 2	SS 3	SS 4	SS 5	SS 6	SS 7	SS 8	SS 9	SS 10	SS 11	SS 12	Site overall
1452518264847													
1452521428434													
1453727760505													
1454336214573													
1454339003967													
1455110884427													
1455037445042													
1455039878234													
1455104068835													
1455108188731													
1484507076909													
1493216906561													
1493288447628													

Reference numbers of the individual parcels of land to be considered

7 Air quality – not a surprise as there is currently very limited vehicle traffic in the Green Belt area
11 Landscape & Heritage – we would expect more green status here, given the current open landscape views

4 Health & Wellbeing – not a surprise as the Green Belt area is currently used for many recreational activities
5 Social Infrastructure access – should all be at red status as the criteria recorded proximity of schools and health services but did not say whether there were places available!

Furthermore, ecology was not considered until Stage 3 of Site Selection, by which time many alternative sites had been filtered out of the process. This means that land with a lower environmental or amenity value may have already been de-selected, leaving biodiversity-rich sites (such as Carrington Moss) still under consideration (contrary to NPPF 175).

We believe ecological assets should have been measured much earlier in the process and should have, at the very least, delivered a consistent Baseline Assessment for each site being considered for development, especially given the concerns expressed in each public consultation about the harms to natural capital, wildlife and ecology.

Habitats and species have not been given significant weight in the selection of PfE allocations. This is particularly important on allocation sites where no (or limited) ecological evidence has been presented in the submission documents.

The site selection document (03.04.01) states that (paragraph 6.44) sites within the Areas of Search have been subject to an assessment against a number of planning constraints which included ecology. The assessment, however, appears to have been limited to the % of the site that is within nationally and locally designated sites (such as sites of special scientific interest, special protection areas, special areas of conservation, sites of biological importance, local nature reserves and wildlife corridors) and the % of the site that is within the Green Infrastructure Network (all measured in m2). We do not believe this is an effective way of determining the impact on ecology to inform the choice of allocations. The process should, as mentioned above, have been determined using the outputs from consistent preliminary ecological appraisals, in accordance with CIEEM guidelines.



Impact of the Removal of the Allocation on the PfE Plan

The updated IA reports reviewed the removal of the Global Logistics (JPA10) and North of Irlam Station (JPA28) allocations from PfE and determined that their removal did not impact the spatial strategy of the plan because other allocations provide sufficient employment space and residential dwellings respectively to meet the identified needs. That conclusion suggests that there was no justification for including those allocations in the plan and is an acknowledgement that the plan is proposing to allocate more Green Belt land than is required to meet need.

Our analysis above suggests this is also the case for the other Green Belt allocations, including New Carrington, meaning that they could be removed from the plan **without** impacting its spatial strategy.

Legal Implications

We believe the allocation of the Green Belt at New Carrington to be unlawful. In addition to specific planning laws and other relevant legislation, precedents have been set in previous judicial reviews. Whilst it is not our preferred approach, and without waiving privilege, we confirm that we are seeking advice on a legal challenge to the allocation, in light of the various and significant flaws identified to date.

Examples of Relevant National Policies and Legislation

In terms of the National Planning Policy Framework, this allocation does not comply with, among others, the following paragraphs: 9, 16, 31, 32, 84, 95, 119, 140, 141, 152, 153, 154, 174, 175, 179, 180, 186.

The evidence base does not include all the information required by the Planning Practice Guidance. As an example, we cannot find any reference to HGV traffic numbers in the Trafford Transport Locality Assessment documents required by PPG paragraph 007 Reference ID: 54-007-20141010, which states that *“where there is known to be a significant level of heavy goods vehicles traffic, a classified count (identifying all vehicles separately) should be provided”*.

In addition to the lack of ecological evidence mentioned in the sections above, there is no *“robust and up-to-date assessments of the need for open space, sport and recreation facilities”* as required by NPPF 98 nor has an assessment *“been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements”* as required by NPPF 99. Yet, this plan will significantly constrain and reduce the outdoor sporting activities (and their associated health and wellbeing benefits) currently enjoyed by residents, including walking, cycling and horse riding on a range of routes of differing lengths and destinations within the allocation boundary.

The **Planning and Compulsory Purchase Act (2004)** requires that *“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change”*. Greater Manchester's 2038 Carbon Neutral Target makes a key contribution to this obligation. The unnecessary allocation of isolated, unsustainable, environmentally-rich Green Belt sites, that currently support to the mitigation of climate change, is contrary to meeting the Authorities' responsibilities as these proposals will increase carbon emissions, increase local flood risk and increase air, noise, light, vibration and water pollution.

Section 19 of that Act requires that planning authorities carry out a sustainability appraisal of each of the proposals in a plan during its preparation, referencing (section 39 of the Act) that the authority preparing a plan must do so *“with the objective of contributing to the achievement of sustainable development”*.



Those sustainability appraisals incorporate the requirements of the [Environmental Assessment of Plans and Programmes Regulations 2004](#). The sustainability appraisal should ensure that any potential environmental effects are given full consideration alongside social and economic issues. The requirement for spatial development strategies to be accompanied by a sustainability appraisal is set out in [regulation 7 of both the Town and Country Planning \(London Spatial Development Strategy\) Regulations 2000](#) and the [Combined Authorities \(Spatial Development Strategy\) Regulations 2018](#).

It is also the Planning and Compulsory Purchase Act (2004) that enables communities (and others) to challenge the plan on the basis that “a *procedural requirement has not been complied with*”.

The Climate Change Act 2008 commits the United Kingdom to bringing carbon emissions to net zero by 2050. In 2023, the government-appointed advisory Climate Change Committee reported that the projections relating to meeting the fourth carbon budget had improved but that the prospects of meeting the fifth and sixth budgets had declined. The Committee concluded that the sixth carbon budget (2033–2037) “*can only be achieved if Government, regional agencies and local authorities work seamlessly together*”.²

This highlights the criticality of attaining the regional carbon neutral target, albeit that it is currently more challenging than the one the government aims to achieve.

Furthermore, legislation such as the recently passed **Environment Act** must also be complied with. It sets out legally binding targets to protect our environment, clean up our air and rivers and to boost nature’s recovery. These were **published** in December 2022, along with aims to (among other things):

- Halt the decline in species populations by 2030, and then increase populations by at least 10% to exceed current levels by 2042
- Restore precious water bodies to their natural state by cracking down on harmful pollution from sewers and abandoned mines and improving water usage in households
- Deliver our net zero ambitions and boost nature recovery by increasing tree and woodland cover to 16.5% of total land area in England by 2050
- Cut exposure to the most harmful air pollutant to human health – PM2.5.

As an example, the Environment Act has established [two further targets](#) for fine particulate matter (PM_{2.5}) in England. PfE should be proposing developments and supporting infrastructure (such as sustainable freight and passenger transport) that support the achievement of these targets.

Furthermore, the GMCA has cherry-picked when the plan will be treated as a whole and when issues should be addressed at a local level (see the paragraph in Appendix A, Role of the Local Plan). This has resulted in the plan failing to ensure “*that discrimination does not occur in the drawing up of plans and policies, and that such plans or policies meet the requirements of equality legislation in the UK, most notably the Equality Act 2010*”. These issues are not addressed in the Equalities Impact Assessment.

Examples of Wildlife Legislation

An ecological appraisal is carried out to ensure that wildlife legislation is not breached because of the proposed development. The potential effects on habitats or species listed as priorities in the UK Biodiversity Action Plan was clearly not a material consideration in selecting the PfE allocations.

² Climate Change Committee (CCC), 2020. *Local Authorities and the Sixth Carbon Budget*. Westminster: Climate Change Committee. <<https://www.theccc.org.uk/wp-content/uploads/2020/12/Local-Authorities-and-the-Sixth-Carbon-Budget.pdf>>

New Carrington Justification



Without a robust ecological appraisal, which has not been carried out for New Carrington, it is not possible to determine whether legislation will (or will not) be breached because of the allocation/development.

Key relevant legislation includes:

- Wildlife & Countryside Act 1981 (as amended)
- Natural Environment & Rural Communities (NERC) Act 2006 (including habitats and species of Principal importance)
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2011
- The Conservation of Habitats and Species Regulations 2017 (as amended)
- The Environment Act 2021
- Hedgerow Regulations 1997
- Protection of Badgers Act 1992
- Wild Mammals (Protection) Act 1996
- Countryside & Rights of Way Act 2000

More information is available on the Wildlife Trusts site [here](#). The Government has also produced this guidance for developers in relation to [Construction near Protected Areas and Wildlife](#).

Examples of previous Judicial Reviews

Given that, among many other issues, there is no evidence that New Carrington is a site which has the least environmental or amenity value (NPPF 175), that the IA did not consider the presence of peat at New Carrington or the implications that the destruction of such a huge peat mass has for the 2038 carbon target, along with uncoded, inappropriate infrastructure (which makes it unlikely that the site will be viable or sustainable), the unsound approach to calculating both market housing and warehousing needs and the lack of ecological (and other) evidence, we consider that decision-making to date has been flawed as a matter of public and environmental law, such that a final determination would be vulnerable to challenge by judicial review.

We note the following cases:

[Aireborough Neighbourhood Development Forum v Leeds City Council & Ors](#) [2020] EWHC 1461 (Admin) (08 June 2020):

- Mrs Justice Lieven ruled (2020) that the large number of Green Belt allocations in the adopted Leeds Site Allocations Plan (SAP) were legally flawed due to inadequate reasons causing prejudice to the Claimant and an error of fact amounting to an error of law.
- This included, for example, the conclusion of the judge that *"It is not clear to me why large windfalls should be ignored in any event, given that they do provide a significant level of housing"*, and that their exclusion from consideration contributed to a material error of fact which amounted to an error of law (paragraph 146).
- The Council was also found to have breached the Strategic Environment Assessment Regulations by failing to consider and consult upon a 'reasonable alternative' to materially changed circumstances. In relation to that latter point, however, relief was not granted due to the Court finding that it was an error that would not have made any difference to the outcome. We do not believe this would be the case in relation to PfE.
- We have identified a number of issues with the Integrated Assessment and believe that, for example, the requirement for 50%-75% of peat mosses to be restored to achieve GM's net zero target that was revealed in the Peat Pilot Report (OD36), should have been determined to be a material change. This should have been fully considered in the Integrated Assessment and should have driven a review of the reasonable alternatives, leading to a further consultation.



- The judgment also highlighted (paragraph 85) that, in the case of *R (Spurrier) v. Secretary of State for Transport* [2019] J.P.L. 1163, the Court set out the approach it should take in considering a claim founded on the basis of alleged deficiencies in the environmental report. The established principle is that the decision-maker's judgement can only be challenged on the grounds of irrationality (*Wednesbury* unreasonableness). It is well established as a matter of public law that failure to take into account relevant considerations and ignorance of a material consideration may amount to an unlawful fetter on discretion such that the decision in question is *Wednesbury* unreasonable.
- Furthermore, paragraph 103 of the judgment states that "*The job for the Inspectors in deciding whether there should be GB release was to apply the NPPF*" and continues that they had to "*determine whether there were exceptional circumstances to justify GB release*" and that the "*Inspectors had to take the up to date position in respect of all material considerations*".
- Given the significance of the deep peat deposits at New Carrington (335 hectares), the lack of consideration within the IA of the importance of peat as a natural capital resource (providing many ecosystem services), supporting climate mitigation and, in particular, supporting the achievement of the 2038 Carbon Neutral Target (as mentioned above in relation to OD36), can be considered irrational. The GMCA did not take reasonable steps to ensure that the impact of construction on deep peat was evaluated within the IA, and that document did not fully consider or take account of the environmental impacts of the decision to allocate land which hosts large quantities of deep peat.
- Other examples of material changes that have been highlighted within our Modifications Consultation response, which should have resulted in an update to the Integrated Assessment, a further review of the reasonable alternatives and the associated consultation, include:
 - The proposed modification to remove the references to prioritising brownfield land (which is explicitly set out in Plan Objectives 2 and 3)
 - The proposed modification to remove from policy the 'target' for Affordable Housing (which significantly weakens the policy and impacts Plan Objectives 1 and 5)
 - The proposed modification to remove 31 Green Belt Additions from policy, which has resulted in an increase in the net loss of Green Belt of over 500 hectares and there has been no consideration of the potential to identify alternatives to reduce this increase in Green Belt loss
 - The proposed modification to criterion 8 of JP-S2 (Carbon and Energy), which introduces a practicable / financially viable test, a significant weakening of the policy that will put the 2038 carbon neutral target (and Plan Objective 7) at greater risk of failure.
- In addition, since the Main Modifications Consultation commenced, the government has cancelled HS2, amounting to another material change that ought reasonably to be reflected in the Growth and Spatial Options, with a further review of the reasonable alternatives, the associated consultation and update to the IA.

In line with the judgment (paragraph 102), the planning inspectors should explain, in their final report, why they have concluded that, following the presentation of all the evidence, they believe there are exceptional circumstances justifying the release of Green Belt in Greater Manchester. That evidence includes:

- The prerequisites of the Greater Manchester Strategy, which this plan repeatedly asserts it aims to deliver, both in terms of what it states are the most pressing issues for the region (climate change and inequality), and the annual level of additional housing required (set out at paragraph 8.3 of the GMS)
- The latest information about household and population estimates available from the government's Office of National Statistics (the UK's largest independent producer of official statistics and its recognised national statistical institute) in the form of analysis of the Census 2021 data
- The amount of "[suitable, available and achievable](#)" land supply set out in the SHLAAs and SELAAs (which should be updated to the 2023 version) submitted by the participating districts (the updated documents should confirm that the density levels for each site are in accordance with the requirements of JP-H4)
- The anticipated amount of annual large/medium windfall expected to be delivered across the plan area, with trend information available to determine the scale of such developments

New Carrington Justification



- The fact that the criteria set out in the Site Selection paper (03.04.01, page 14) that states “Where a single district has sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt”, was not followed and districts that exceeded their ‘targets’ over the 15 year period required by the NPPF, still proposed Green Belt release (it should be noted that, when considering the plan “as a whole” as required by the legislation, and repeatedly asserted by the GMCA, the government’s housing need figures for the 15 year period are met for the region).
- Compliance with the NPPF, including paragraph 68, which does not require land supply to be identified for the full term of the plan, it only requires sufficient land for the first 15 years of the plan period. A lack of land supply for the final two years of the plan period does not render the plan unsound and cannot be considered to be “exceptional circumstances” that require the release of Green Belt.
- PFE makes the strategic level case for exceptional circumstances in document 07.01.25 (paragraph 1.21), which includes confirming that land supply has been augmented with a buffer of at least 10% in accordance with what was then NPPF paragraph 73, now NPPF paragraph 74. The NPPF is very clear that the buffer should be imposed on the “supply of specific deliverable sites” not on the entire land supply.

For the reasons set out above, and elsewhere in this document, we do not believe the planning inspectors can conclude that the case for exceptional circumstances (in accordance with NPPF paragraphs 140 and 141) has been met.

[Watton and Cameron v The Cornwall Council](#) [2023] EWHC 2436 (Admin) (4th October 2023), particularly points 24-31, which deal with why and how reports should respond to those who have taken the trouble to comment on policy and planning applications – the linked case is [South Bucks District Council and another \(Respondents\) v. Porter \(FC\) Appellant](#) (1st July 2004).

- This judgment requires that the planning inspectors justify the reasoning behind their decisions, including, for example, their contention that:
 - exceptional circumstances exist for the release of Green Belt
 - the allocation of sites that host deep peat, against the advice of Natural England, is sound, when those sites are needed for restoration to support the achievement of the 2038 carbon neutral target
 - the plan, when considered as a whole, will support the delivery of the 2038 net zero target, given the evidence to the contrary
 - the allocation of isolated, unsustainable, environmentally-rich sites, such as New Carrington, is sound, contrary to the many compelling arguments that suggest otherwise
 - the IA is sound despite its failure to test the policies in the plan against, among other things, the carbon target.

The Watton ruling obliges such reasoning to uphold the standards of the earlier Porter case, mentioned above. This requires that “*The reasons for a decision must be intelligible and they must be adequate. They must enable the reader to understand why the matter was decided as it was and what conclusions were reached on the ‘principal important controversial issues’, disclosing how any issue of law or fact was resolved. Reasons can be briefly stated, the degree of particularity required depending entirely on the nature of the issues falling for decision. The reasoning must not give rise to a substantial doubt as to whether the decision-maker erred in law, for example by misunderstanding some relevant policy or some other important matter or by failing to reach a rational decision on relevant grounds*”.

New Carrington Justification



We noted a number of failings in the Integrated Assessment, for example, in our original submission and in the Hearings. As set out in our response to the Modifications Consultation, our concerns have not been addressed by the latest update. We are particularly concerned that the IA's failure to recognise the requirement for GM to restore 50-75% of its peatland in order to achieve the 2038 Carbon Neutral Target. This is one of several issues which we believe should have been considered to be a material change, necessitating a review of the reasonable alternatives, and leading to a further consultation.

Furthermore, we do not believe there is sufficient evidence to determine that the plan allocates land "*with the least environmental or amenity value*", in accordance with NPPF paragraph 175. We set out our reasoning above but, in particular, do not believe the presence of irreplaceable habitat was either acknowledged as a planning constraint nor, in any event, given sufficient weight in the decision-making process (in terms of both site selection and in determining the soundness of the New Carrington allocation). It remains unclear to what extent, if at all, this consideration has been taken into account.

We summarise our concerns about the Site Selection process above, including highlighting that the site selection criteria omitted any reference to ensuring the process supports the plan's Strategic Objectives 8 and 9. Given that the site selection process must be procedurally fair (according to the Planning and Compulsory Purchase Act), the planning inspectors should set out in their final report why sites were not unduly prejudiced by the flaws in the process. The reasoning provided by the examiners "*must not give rise to a substantial doubt as to whether the decision-maker erred in law*" per *Watton*.

Furthermore, as we set out above, a suitable compensation strategy for the deterioration or loss of the huge expanse of peat at New Carrington will be challenging to compensate for in accordance with [DEFRA guidelines](#). The planning inspectors must, therefore, be able to provide intelligible and adequate reasons (per *Watton*) for their conclusions that allocating development on peatland:

- can be appropriately compensated for, in accordance with DEFRA guidelines
- does not compromise Greater Manchester's pathway to carbon neutrality, which is contingent on 50–75 percent of peat being restored
- does not compromise delivery of the government's [Net Zero Carbon Strategy](#), which has a key policy commitment to restore 280,000 hectares of peat.

[Friends of the Earth, Client Earth, the Good Law Project and Joanna Wheatley v Secretary of State for Business, Energy and Industrial Strategy](#) [2022] EWHC 1841 (Admin) (18th July 2022, provides some insight into the level and nature of detail that should be present in formulating and consulting on a net zero strategy.

The Court found that the government's Net Zero Strategy (NZS) had been unlawfully adopted as:

- The Minister had legally insufficient information before him to adopt the NZS. He had, for example, been informed that the quantified policies in the NZS added up to c.95% of the emissions reductions needed to meet the sixth carbon budget, but he had not been provided with the breakdown of the contributions of the individual policies, and it had not been explained to him how the 5% shortfall would be made up. This meant that he was not able to properly understand the risk to the delivery of the policies in the NZS. Risk to delivery was considered to be an obviously material consideration.
- The NZS itself lacked vital information which meant that Parliament and the public were unable to properly scrutinize it. Parliament, for example, was not aware of the 5% shortfall for meeting CB6. The NZS should have included quantified policies (i.e. setting out what their individual emissions reductions were estimated to be), in order for Parliament to be able to scrutinize risk to delivery. The judgment placed "*considerable weight*" on the views of the Committee on Climate Change, the independent expert body under the CCA, which had advised the Government that the NZS should include quantified policies.



The Court determined (paragraph 185) that, because the Net Zero Strategy and the associated carbon budget set numerical targets, *“there must be some quantitative assessment of the effects of the proposed policies”*.

Given the lack of quantitative evidence relating to the carbon emissions impact of PfE, it is not possible to understand the consequences of the plan on the achievement of the 2038 Carbon Neutral Target. The planning inspectors have, therefore, fettered their discretion as to which spatial option and/or policies provide the most beneficial outcome in relation to achievement of that Target, and have disregarded relevant considerations in the process of doing so.

Furthermore, that lack of quantitative data means that it is impossible for the GMCA or the planning inspectors to, for example, determine the effect of the modification proposed to JP-S2, criterion 8, which is now subject to a test of practicability/financial viability, on the Target. This too amounts to a fetter on the planning inspectors' discretion and/or a failure to take account of relevant considerations.

The flaws within the IA are also relevant to this judgment, which found that the *“Secretary of State cannot properly and rationally be satisfied that his proposals and policies will enable the carbon budgets to be met without quantitative analysis to predict the effects of those proposals and policies in reducing GHG emissions”* (paragraph 202). The IA fails to test whether the plan supports or undermines the 2038 Carbon Neutral Target.

One of the Assessment Criteria set out in document 02.01.09 (page 224), for example, is related to promoting a proactive reduction in emissions across GM. The IA suggested that this objective is not considered to be relevant for site selection. Given the plan period and that legislation (the Planning and Compulsory Purchase Act 2004) requires that plans (taken as a whole) must include policies that *“contribute to the mitigation of, and adaptation to, climate change”*, it is hard to conclude that a proactive approach to mitigating and adapting to climate change and achieving radical carbon emissions reductions in line with national requirements (among others NPPF 152, 153, 154), and to support the achievement of GM's Carbon Neutral Target, can be realised when this criteria was not considered when assessing the sites to be allocated.

Furthermore, PfE does not provide or measure the carbon consequences of the list of *“Necessary Transport Interventions”* set out at Appendix D, despite the recognition (paragraph 10.8) that achieving GM's carbon targets *“will require substantial reductions in carbon emissions from transport”*, that *“action must be taken now”* if we are to make those targets a reality, and that *“significant reductions in carbon emissions from transport are vital in achieving these ambitions”*.

The Friends of the Earth, etc judgment concluded that it is necessary to have an understanding of the relative contributions made by individual measures to achieving the targets, to enable the risk to deliverability to be determined (paragraph 204). The GMCA has failed to enable such an assessment.

In addition, even though Greater Manchester does not have a statutory net-zero carbon target, the level of detail that the government's Net Zero Carbon Strategy must provide in order to enable scrutiny offers a comparable benchmark for the level of detail and scrutiny that Greater Manchester should legally provide as part of a public consultation.

That issue leads us to the Gunning Principles ([R v London Borough of Brent, ex parte Gunning](#), 1985, Sedley QC) which have repeatedly been ignored throughout the development of this plan. We raised a number of issues within our original representation and at the Examination Hearings.

Per *Gunning*, a consultation is only lawfully adequate when the following four principles are met:

- Proposals are still at a formative stage (the final decision has not yet been made, or predetermined, by the decision-makers)
- There is sufficient information to give ‘intelligent consideration’ (the information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response)



- There is adequate time for consideration and response (there must be sufficient opportunity for consultees to participate in the consultation, there is no set timeframe for consultation, despite the widely accepted twelve-week consultation period, as the length of time given for a consultee to response can vary depending on the subject and extent of impact of the consultation)
- ‘Conscientious consideration’ must be given to the consultation responses before a decision is made (decision-makers should be able to provide evidence that they took consultation responses into account).

These principles were reinforced in 2001 ([R v North and East Devon Health Authority, ex parte Coughlan](#)) and then in a 2014 Supreme Court case ([R ex parte Moseley v LB Haringey](#)), which endorsed their legal standing. Since then, the Gunning Principles have formed a strong legal foundation from which the legitimacy of public consultations is assessed, and they are frequently referred to as a legal basis for judicial review decisions. The NPPF paragraph 16(c) reflects this, stating that plans should be “*shaped by early, proportionate and effective engagement between plan-makers and communities*”.

Moseley has been applied in a number of cases pertinent to the GMCA's decision-making and the New Carrington proposals. In [R \(Stephenson\) v Secretary of State for Housing Communities and Local Government \[2019\] EWHC 519](#) (Admin), for example, Mr Justice Dove applied *Moseley* to find that provisions in the National Planning Policy framework were unlawful, on the basis that the Secretary of State had failed to consider or take into account scientific and other information, included in a consultation response, and of relevance to the Secretary of State's decision.

This information was clearly material on the basis that it was capable of having a direct bearing on a key element of the evidence base for the proposed policy and its relationship to climate change effects. The same error has been evident in the Places for Everyone decisions to date.

Dove J in *Stephenson* also found that the Secretary of State had erred in law that the consultation exercise was legally flawed because, by contrast with what the reasonable reader would have discerned from the publicly available material, the Secretary of State was not undertaking the consultation at a formative stage and had no intention of changing his mind about the substance of the revised policy. We consider that the same blinkered approach has been taken in relation to the New Carrington proposal to date.

The GMCA has failed to give “*Conscientious Consideration*” to consultation responses, as is evident in their failure to take into account material and relevant considerations, as set out above, including, for example:

- Failure to adequately take into account, and/or give reasons for decisions with respect to the presence of deep peat in Carrington Moss, including its extent, and the ecological and climatic value of peat
- Failure to consider the advice of Natural England, including that set out in PfE's Natural Environment Topic Paper
- Failure to consider alternative sites, with a lower environmental or amenity value (in accordance with NPPF 175)
- Failure to consider the impact of the plan, (particularly the allocations), on the rural economy, despite NPPF paragraphs 84 and 85, and failure to include data on the plan's projected impact more generally, including on natural capital resources
- Failure to consider the impact of the allocations on the achievement of Plan Objectives, including, for example, the prioritisation of the use of brownfield land, the prioritisation of sustainable transport modes and the achievement of the 2038 Carbon Neutral Target
- Failure to consider the impact of the lack of sustainable freight transport options, despite the proposal to allocate warehousing and logistics in isolated locations (with the associated huge increases in air, noise, light, vibration and water pollution and carbon emissions)



- Failure to substantiate statements set out in PfE documentation, such as the New Carrington Masterplan (Section 3.1, page 10) suggesting that **thousands** of new jobs, across **a wide range of sectors and skill-levels**, will be accessible to **local people**
- Failure to provide adequate information on, for example, the carbon emissions impact of the plan, the availability of school places and health service provision within the New Carrington allocation area, the lack of traffic information (including that required by Planning Practice Guidance) among many other data gaps
- Failure to address the perceived flaws in the Site Selection process and the Integrated Assessment.

In general, and as set out in our original response, we believe consultation and engagement with residents has been very poor and there has been a failure to engage with “hard to reach” groups and young people who will be significantly impacted by the plan. We provided examples in relation to the New Carrington allocation, which was designed with landowners and developers, without any input from residents, and we set out in our response (page 151) why we believe the allocation does not comply with the requirements of the Gunning Principles, nor was the Council’s Statement of Community Involvement followed.

Places for Everyone falls well below the standards required under the *Gunning* principles and does not meet the tests well accepted in public law for the sound determination of major decisions of this type.

Conclusion

As mentioned above, we disagree with the planning inspectors’ conclusions in relation to the New Carrington allocation and do not believe the “*public benefit arising from the development proposed would be likely to clearly outweigh the loss or deterioration of an irreplaceable habitat*” nor do we agree that “*a suitable compensation strategy was capable of being delivered*” as set out in the paragraphs above and in Appendix A below.

Given the input from Natural England and the lack of evidence provided in relation to, for example, ecology, natural capital benefits, the rural economy and the carbon emissions impact of the allocation, we do not understand how the planning inspectors have determined that the planning balance is in favour of development.

Despite Plan Objectives (2 and 3) to “*Prioritise the use of brownfield land*”, PfE has focused on bringing forward unsustainable sites in the Green Belt, rather than on tackling the huge levels of available previously developed land (CPRE’s *State of Brownfield* report singles out the North West and Manchester as places with high brownfield capacity). The plan has significantly over-inflated the requirement for market housing and warehousing, there is insufficient provision of desperately needed genuinely affordable homes, rural communities and the rural economy have been totally disregarded, as have vulnerable groups such as the Traveller community, and insufficient weight has been given to the impact on climate change mitigation opportunities, the environment and nature’s recovery.

Furthermore, New Carrington will not deliver the key attributes required by policy JP-P1 (Sustainable Places), including, for example, conservation and enhancement of the natural environment, landscape features, historic environment and local history and culture (criterion 1A), the allocation will significantly reduce local capabilities to deal with major environmental events (criterion 4), and the size and scale of the developments increase the risks associated with response and evacuation in the case of an emergency or disaster (criterion 8), especially given the number of hazardous businesses located within, and adjacent to, the allocation area.

New Carrington Justification



New Carrington is not well-connected to other places and, whilst there are aspirations, there is no evidence that the limited public transport proposed (no trams or trains for the largest allocation in the plan) will be provided (criterion 14). Air, noise, light, vibration and water pollution will increase significantly due to the lack of sustainable freight transport options (criterion 15A) and there is no evidence that the allocation will be well-served by local shops, services and amenities, including education and health facilities (criterion 17).

In summary, New Carrington is not a sustainable location today (confirmed by Trafford in the evidence documents). The PFE plan and the modifications set out within the plan, and at MM4.29, MM4.30, MMTr2, MMTr3, MMTr4 and MMApxD1 specifically, do not address that lack of sustainability within the allocation proposals, making the New Carrington allocation unsound for the many reasons set out in our responses to this modifications consultation, within this document and summarised below:

- the Green Belt area of this allocation is essential to supporting the mitigation of climate change and the achievement of GM's aim to be carbon neutral by 2038 - the proposed development is inconsistent with the objectives and provisions of the Climate Change Act 2008 and will increase, rather than contribute to radical reductions in, greenhouse gas emissions (NPPF 152), in allocating this site, the plan does not comply with the requirements of NPPF paragraphs 153 and 154
- the planned development will also affect Trafford's ability to mitigate local flood risk, which will increase substantially as development is delivered
- the allocation is not compliant with (among others) NPPF paragraphs 174, 175, 179 and, as discussed elsewhere in this response, 180(c) - the current land use of the Green Belt area comprises irreplaceable habitat (peatmoss), Grade 2 agricultural land, woodland and wetland habitats, all essential to nature's recovery
- surrounding the peatmoss and SBIs/SSSIs with housing, warehousing and roads will be damaging and destructive, rather than strengthening and restorative, especially given the drainage required to make development possible and much of the remaining Green Belt is not accessible to the general public nor is it available to provide areas to support mitigation opportunities and/or compensation
- the habitats on and around Carrington Moss sustain populations of red listed birds and endangered/protected wildlife species, yet there has been no assessment of the consequences of the proposed development on their already depleted numbers
- there is no reference to any committed funding to support the long list of "*Necessary Transport Interventions*" set out at Appendix D - the values included in the viability assessments do not take the full list into account, which could result in those "*Necessary*" interventions not being delivered
- the proposed developments will fracture existing public rights of way that are well-used by residents, for walking, cycling and horse riding, this will discourage active travel use, contrary to national, regional and local aspirations
- there is no evidence in the plan which sets out the impact to the rural economy as a consequence of the development - farms, riding stables and their supply chains will all be affected due to the huge extent of the development in the area
- the deletion of criterion 12 means there is no longer any reference to sustainable growth and the considerable weakening of other policies (both thematic and within the allocation), including the introduction of the practicable / financially viable test to criterion 8 of JP-S2 and the dilution of JPA33 criterion 14, reduces the probability of the plan resulting in sustainable development
- the minimum Affordable Housing requirement for the allocation is extremely low at just 15%, alternative locations may be able to deliver a much higher percentage, and the number of affordable homes provided within the allocation area may be reduced further due to viability issues
- the scale of warehousing/logistics development (not a diverse range of employment opportunities) set out for New Carrington should have required a sustainable freight solution to be implemented (especially given the proximity of the Manchester Ship Canal and the presence of the former railway lines with the allocation boundary). The lack of such a solution will result in thousands of additional HGVs using local roads on a daily basis, causing huge levels of air, noise, light, vibration and water pollution, and of course, significantly increasing carbon emissions. This is clearly unsustainable, does not support the achievement of GM's aim to be carbon neutral by 2038 and will have health and wellbeing consequences for new and existing residents

New Carrington Justification



- the Health and Safety Executive has already raised concerns about the number of staff located in the brownfield area due to the existence of COMAH (accident and hazard) zones – evacuation of the allocation site in the event of an incident will be significantly impacted by the huge increase in traffic caused by the proposed developments (residents, employees and HGVs carrying hazardous materials) – a recently approved planning application will, for example, generate over 700 HGVs a day (when fully operational) all carrying hazardous materials
- the current masterplan does not identify any schools within the allocation boundary, given the lack of public transport available, and the distances involved, parents will, therefore, be required to drive their children to and from school and there could be huge issues with access to school places, which are already a strategic red risk for Trafford, due to catchment and admissions policies
- the removal of criterion 24 leaves the situation regarding local healthcare facilities unclear, in all likelihood resulting in residents having to drive to receive services (and we note that PfE sets no land aside for a new hospital to provide services to the proposed additional population of over 400,000 citizens).

In addition, community concerns about the significant weakening of the policies that were agreed in the current local plan have not been given sufficient weight. As an example, the Core Strategy:

- explicitly protects and enhances mosslands as a natural carbon sink (CAO14 p46)
- protects agricultural land (R4.5 p176)
- specifically protects the open land at Warburton and South of the Shell complex **from** development (R4.7 p176).

National planning policy states that *“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”*.

There are no other places in Trafford where we can:

- restore peat, to more effectively capture and sequester carbon, to support the achievement of the carbon neutral target and so future generations can breathe cleaner air
- grow crops and alleviate surface water risks, so our descendants have fresh food, with a low carbon footprint, and residents are not fearful of flooding every time it rains
- increase significantly the populations of endangered/protected birds and wildlife, to help nature's recovery, increase biodiversity and mitigate the impact of climate change

With that in mind, the environmentally-rich Green Belt area known as Carrington Moss, which is teeming with natural capital and ecosystem services, should have been allocated for protection and restoration, not for construction. In addition to superior carbon capture capabilities, restoring the peatmoss would bring numerous ecosystem [benefits](#). The area has a long history of extensive surface water flooding, which not only damages property, it impacts the mental and physical health of both human and wildlife populations.

We do not consider the New Carrington allocation to be positively prepared, justified or effective. We believe it to be unlawful as it fails to meet the requirements of the National Planning Policy Framework, the Planning Practice Guidance and other government policies, including the climate mitigation requirements, the England Peat Action Plan and the government's 25-year Environment Plan. There are flaws, a lack of good practice and a lack of consideration of the most up-to-date information in the processes, including Site Selection, the Integrated Assessment and the calculation of both market housing and warehousing requirements. It is, therefore, unsound and the planning inspector's main modifications do not make it sound. For all the reasons set out in this document, JPA33 should be removed from the PfE plan.

Appendix A: A Summary of Other factors to be Considered

Role of the Local Plan

The Local Plans are expected (among many other things) to:

- set the 'targets' for the provision for affordable housing
- identify the need for expansion of any existing town centres, or the provision of new centres
- deal with the rural economy (despite some rural land being allocated in this plan, meaning it will no longer be available to support a prosperous rural economy)
- plan for sites for Travellers, Students and other vulnerable groups
- identify what is important for heritage conservation and enhancement purposes
- designate land in accordance with NPPF 179(a) – this will clearly exclude the land already allocated by PfE, even if that land is currently the site with the district's highest environmental or amenity value.

It is, therefore, inconsistent, unjustified and discriminatory for Green Belt release to be proposed in this plan, rather than being considered, alongside other land needs, in local plans.

Plan Period

There was no soundness reason behind the decision to add an extra year to the Plan period (increasing it from a 16-year plan to a 17-year plan), now 2022-2039. Given the plan will not be approved until 2024, at the earliest, it would be more reasonable for the period to revert to a 16-year plan, for the years 2023-2039 (for this period to be effective the 2023 SHLAAs and SELAAs should be used within the evidence base).

Housing

The unnecessary change to extend the plan period has resulted in the requirements of the government's housing need figure increasing from 165,000 to 175,000 homes. Despite this, there is sufficient "[suitable, available and achievable](#)" existing housing land supply to exceed the government's figure – without releasing any Green Belt land.

To be compliant with NPPF 31 and the [Guide for Local Plan Examinations](#), the final decision on housing and employment numbers and the Plan Period should be based on the 2023 SHLAAs, which should confirm the proposed densities comply with policy JP-H4.

Paragraph 8.60 of the plan states that "*The need to deliver the positive long-term outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt*". Yet, paragraph 8.3 of the Greater Manchester Strategy states that GM needs "*to build over 10,000 houses a year for the next 20 years*", a figure that can be met by delivering the existing land supply (without any release of Green Belt land). This means that the exceptional circumstances to justify altering the boundaries of the Green Belt have **NOT** been demonstrated.

There is sufficient existing housing land supply to create the equivalent of two new boroughs in Greater Manchester. This excessive level of growth can only be sustainable within urban areas that have the necessary infrastructure. Isolated, rural Green Belt locations cannot be sustainable without significant investment. No evidence has been provided that such significant investment can be funded and delivered.



Affordable Homes

Despite being labelled 'Places for **Everyone**', we do not believe that this plan will deliver housing for those GM citizens who need genuinely affordable homes (social housing). GM has over 70,000 households on local authority registers, and PfE estimates that *"around 38% of newly forming households are unable to afford to buy or rent a home at lower quartile prices"*. Yet, during the Examination, the Affordable Housing Policy has been weakened considerably, removing the specific 'targets' from policy, taking out reference to genuinely affordable homes altogether, relegating it to a mere aspiration.

PfE paragraph 7.27 states that *"Many of the higher value suburban neighbourhoods are located in the south of the conurbation, forming part of a much larger high-value area extending into north Cheshire"*, clearly demonstrating that housing in Trafford should be focused on areas that can deliver a much higher number of genuinely affordable homes.

One of the UK's top planning Barristers, Chris Young KC, mentioned in [his article](#) (May 2021) that *"Affordable housing is by far the greatest benefit of any planning proposal for housing. And as a matter of fact, it is the single greatest advantage that a greenfield site has over brownfield sites."* (paragraph 7). He goes on to say (paragraph 11) that *"The simple fact is that greenfield sites not only deliver more homes to address the crisis in housing supply. But they also deliver 30%, 40% or even 50% of that housing is affordable housing for those who suffer the "grief and hardship" of our national housing emergency"*.

At New Carrington the number of Affordable Homes was originally set at 30% (compared to the 45% at Timperley Wedge), but the scheme was found to be unviable. The number of Affordable Homes was then reduced to 15%, but the scheme was still unviable. Trafford then decided to increase the house prices at New Carrington by 10%. At this time of increased interest rates, escalating materials costs and, actually, lower house prices, it is anticipated that developers will negotiate further reductions in affordable housing (due to viability issues) as planning applications come forward.

It is also inappropriate to put 25% of Trafford's housing development for the next 17 years in just one of 21 Wards, when other locations may be able to deliver a higher level of affordable housing.

This PfE plan now focuses only on the delivery of market housing and warehousing, despite repeatedly asserting that the plan aims to deliver the ambitions of the Greater Manchester Strategy. The lack of prioritisation of Affordable Housing does not address the equalities agenda, highlighted as a key priority in the GMS, and neither the IA nor the EQIA highlights the equality issues that are consequential to the subordination of the affordable housing 'targets' to reasoned justification and District Local Plans.

Document MDC8 (Appendix A EQIA) states (page 5) that the *"EqIA is designed to ensure that discrimination does not occur in the drawing up of plans and policies, and that such plans or policies meet the requirements of equality legislation in the UK, most notably the Equality Act 2010"*.

The EQIA goes on to say (page 5) that *"It should be noted that the EqIA seeks to not only avoid / mitigate negative impacts on equality, but is also focused on enhancing, in this case the PfE Plan objectives and policies, in relation to equality matters. As such, the IA goes beyond the minimum requirements of assessing impacts in line with the Equality Act 2010, but also provides a holistic assessment of equality, diversity and health and wellbeing (an important factor in determining equality) and embeds this within the IA framework and throughout the assessment of the iterations of the draft PfE Plan"*.

Yet, inequality pervades the plan, with homes for travellers and students also relegated to Local Plans, along with the employment requirements of the rural areas of Greater Manchester.



Provision of Jobs at New Carrington

The unnecessary change to extend the plan period by an additional year (as explained above) has resulted in the employment Gross Need requirement being increased by almost 160,000 m², with the total supply including a buffer/contingency of 65% and incorporating over 100,000 m² of land that will not come forward within the extended plan period.

In addition, the warehousing land supply estimates use a flawed methodology which does not take into consideration the negative net demand for B1 & B2 floorspace (a figure that exceeded the positive net demand for B8 storage), that figure should have been incorporated within the land requirement calculations.

This has resulted in around 50% of warehousing to be built in unsustainable locations on Green Belt. We do not believe this represents a “sound” plan for Greater Manchester, given that there is no evidence that the infrastructure funding required to support such a plan will be available.

GM **does** have alternatives to locating warehousing on isolated Green Belt sites, but these appear to have been disregarded. The potential to convert the 1.3million m² of excess office floorspace, for example, much of which is in sustainable locations, appears to have been ignored.

The New Carrington allocation will have a very limited role in addressing the local socio-economic challenges (paragraph 4.2) for the existing communities in Carrington, Partington and Sale West. There are NO proposals for technology businesses, NO green jobs, NO innovation opportunities. Furthermore, it has been shown, in previous 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 new jobs for local people).

As set out in our response to MMT², a recent planning application states, in relation to the Places for Everyone Plan, that (Emery letter re 109755/OUT/22) *“the draft plan proposes to allocate a quantum of employment land significantly higher than past take-up rates based on the need to address qualitative issues in the market, in particular the need for large-scale logistics”*.

Then, having made the claim that B2/B8 warehousing space is essential to sustaining southern competitiveness, paragraph 6.21 of the 109755 Planning Statement highlights (in relation to the Green Belt land to be released within this allocation for employment purposes) that *“CE3A (land south of Lyondellbasell) largely falls within the Lyondellbasell inner COMAH zone and a large-scale unit (i.e., in excess of 250,000 sq. ft / 23,225 sqm) **would not be possible**”*.

This evidence suggests that it is unsound for the Green Belt land at CE3A to be released as it will not support the size of development required. This is also true of any other Green Belt land within the region which cannot deliver large-scale logistics.

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

In addition, more brownfield land comes forward for development every year, to support both housing and employment needs. An appropriate estimate of these windfall sites should have been incorporated within the land supply figures.

Furthermore, unlike warehousing and logistics, the rural economy will be addressed AFTER significant Green Belt release, meaning the Grade 2 agricultural land at New Carrington is no longer available to those wishing to continue to operate or expand their rural businesses, affecting not just the companies themselves, but also their supply chains. Given that Green Belt covers almost 50% of GM's land mass, the premature release of best and most versatile agricultural land is extremely prejudicial to the national policy requirement to support a prosperous rural economy.



Provision of Sustainable Transport Options

The aim of **GM's Transport Strategy** is to ensure there will be “**zero net growth in motor vehicle traffic in Greater Manchester between 2017 and 2040**”, an admirable aspiration. On freight, the ambition is to achieve modal shift to water and rail. For people, the intention is that, by 2040, 50% of all journeys in Greater Manchester will be made by public transport or active travel, supporting a reduction in car use to no more than 50% of daily trips.

Yet GM's plans **do not** prioritise sustainable freight and passenger transport, despite the disproportionate focus on warehousing development and the current poor public transport provision in areas highlighted for development.

Currently an unsustainable, isolated community (paragraph 4.71), poorly served by public transport (paragraph 4.72), with plans for an unsustainable low density suburban development, both the residential and the employment areas of the New Carrington site will mostly be accessed by car (and HGV). The policy brings no trams, no trains and no funded commitment to increased bus services.

Document 09.01.02 suggests (paragraph 115) that the aim is to minimise road-freight miles. PfE paragraph 10.10 highlights the five specific transport decarbonisation priorities that are set out in GM's 5-year Environment Plan. The list includes “*Decarbonising road freight and shifting more freight movement to rail and water*”. This requirement is reinforced in paragraph 10.70. Yet, despite the proximity of the Manchester Ship Canal and the disused railway lines within the allocation area, there are no plans for sustainable freight at New Carrington.

The plan now incorporates Appendix D, which sets out a long list of “*Necessary Transport Interventions*” for this allocation. Yet, there is no confirmation that the necessary funding is available to deliver this list of transport schemes and, in fact, a response to an FOI request confirmed that there are no plans for additional public transport in and around the allocation area (Carrington, Partington, Sale West and Warburton have all seen a huge decline in bus services over the past 10 years whilst this plan has been under consideration).

Partington has a much lower proportion of households with access to a car than the rest of Trafford, so this plan will leave them in a continued position of isolation, with no demonstrable benefits from a plan which proposes the construction of 4 major new roads across the much-used green space of this deprived community.

Plan documents 09.01.15 and 09.01.27 report different numbers for both housing and employment space to those set out in the allocation and do not provide the required information to determine the actual level of traffic. We cannot find any reference to HGV numbers in those TLAs. This appears to be a specific requirement of PPG 007(ID:54-007-20141010) - “*where there is known to be a significant level of heavy goods vehicles traffic, a classified count (identifying all vehicles separately) should be provided*”. The documents also lack the transparency needed to determine whether traffic from outside the borough is adequately considered. This is important as changes to, for example, the Warburton Bridge Toll will result in changes to traffic volumes.

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



Growth and Spatial Options and the Cancellation of HS2

PfE states that this plan “*has a vital role in delivering*” the vision set out in the Greater Manchester Strategy (GMS), paragraph 12.1. Given that the GMS highlights that the most pressing issues for the city-region are “*climate change and inequality*”, that GM needs “*to act quickly on decarbonisation*” and that the “*refreshed Greater Manchester Strategy therefore puts the climate and equalities agendas at its heart*”, this plan should have a Growth and Spatial Options approach that reflects the ambitions of the GMS.

The choice of Growth and Spatial Options was agreed prior to the declarations of a climate emergency and the introduction of the Net Zero target, and it was aligned with the delivery of HS2 and the associated infrastructure.

The cancellation of HS2 and the time that could elapse prior to a replacement being agreed and funded, along with the recognition that the 2038 Net Zero Carbon Target is at risk, requires the current options to be reviewed. The Public Transport Max Spatial Option could now take advantage of funding previously allocated to HS2. As a minimum, the IA should be updated to address all the responses received to this consultation and assess the impact of the cancellation of HS2.

We have already mentioned that the plan has not evidenced that its policies can deliver the 2038 Carbon Neutral Target. It is also clear that insufficient consideration was given to alternative spatial options that are arguably better placed to achieve this Target (public transport max, for example). Furthermore, traffic accounts for two-thirds of NO₂ emissions, and the government was ordered by the High Court to reduce NO₂ emissions in the “*shortest time possible*”. Seven districts in Greater Manchester were subsequently directed by government to establish a clean air plan to implement this directive. The relative performance of the spatial options should have been measured against this goal. If public transport max, for example, can reduce NO₂ emissions in a shorter time than the other spatial options, the GMCA should have published clear rationale setting out why this option was not selected.

Provision of Community Amenities at New Carrington

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

Plan Objective 9 states that GM will “*Ensure new development is properly served by physical and social infrastructure, including schools, health, social care, sports and recreation facilities*”. NPPF paragraph 95 outlines the importance of sufficient choice of school places for both existing and new communities. A Red risk on [Trafford's Strategic Register](#), the unprecedented demand for school places was highlighted to [Trafford's Executive \(September 2021\)](#). Yet, the New Carrington [masterplan](#) (10.09.06) does not identify any schools within the allocation area (despite the size of the site).

As currently documented, we do not believe the allocation will meet this Plan Objective.

Adherence to National, Regional and Local Policies

As set out above, the allocation will not be effective in securing sustainable development, it is non-compliant with a number of national policies, including (but not limited to) the NPPF paragraphs highlighted in [Relevant National Policies and Legislation](#). It is also contrary to national climate change policy, the England Peat Action Plan, and the Government's 25-Year Environment Plan.



The government has also signalled (in its response to the [CCC Annual Progress Report 2023](#)) that it intends “to review national planning policy to make sure it further contributes to climate change mitigation and adaptation. The NPPF is already clear that the planning system should support the transition to a low carbon future in a changing climate. At the heart of the framework is the presumption in favour of sustainable development, for plan making, this means that **all plans should promote sustainable patterns of development that seeks to improve the environment and mitigate climate change**” (Priority R2023- 155). Legislation such as the recently passed **Environment Act** must also be complied with.

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

By way of example, the allocation will bring significant increases in road traffic and associated air, noise, light, vibration and water pollution, along with carbon emissions. No evidence is provided about current air pollution levels, nor is there any predictive analysis of future figures. As mentioned above, the carbon emissions data within the plan also lacks appropriate level of detail, with no recognition or understanding of the impact of the plan on the achievement of the 2038 Carbon Neutral Target.

Furthermore, the evidence base lacks important assessments, set out in the NPPF and the Planning Practice Guidance, that should be available to support the decision to allocate New Carrington.

Viability

Viability for New Carrington is, at best, marginal, and currently does not include the full list of costs required by Appendix D (our very conservative estimate for these costs is £400m).

Document 03.01.04 recognises the viability for this allocation is finely balanced, making it particularly vulnerable in the current financial climate. Transparency is essential, the associated assumptions and contingency should be more visible.

Given the planned construction on peat and contaminated land, we are concerned that even the low figure of 15% affordable housing will be considered unviable by developers. It is unclear whether the carbon emissions offset costs are included in the viability assessment, including those for changes in land use. Development on peat moss will be complex and expensive (drainage and hydrology will need to be harmonised, to avert flooding but ensure the health of the remaining peatland and reserves are not impacted). Sustainability will be extremely challenging to achieve.

Harm to Green Belt Purposes at New Carrington

We do not believe the exceptional circumstances to justify altering the Green Belt boundaries have been demonstrated in accordance with NPPF paragraphs 140 and 141.

The Plan Objectives 2 and 3 (“*Prioritise the use of brownfield land*”) will not be achieved if Green Belt is released on the day the plan is adopted as the appetite for brownfield development will be affected if greenfield land is available. This means that Green Belt Harm will be incurred, whilst brownfield is not regenerated and the amount of available previously developed land increases as a result of windfall coming forward.

NPPF paragraph 141 requires that the plan “*optimises the density of development*”. This has not been demonstrated in the plan as the SHLAAs do not contain any information about the density to be delivered by the existing land supply and there is no other data within the evidence base.

New Carrington Justification



As set out elsewhere in this document, the statement in PfE paragraph 8.60 (that *“The need to deliver the positive long-term outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt”*) is not substantiated within the Greater Manchester Strategy. There has been inadequate consideration of all reasonable alternative options, which is inconsistent with NPPF paragraph 141, and the available evidence confirms that there is sufficient existing land supply to meet GM's needs, without releasing Green Belt, including the addition of a substantial buffer on both housing and warehousing requirements.

In relation to New Carrington, PfE document 07.01.25 (c3, p111) confirms that JPA33 *“would cause ‘Very High’ harm to Green Belt purposes”*. This is evidenced by the harm ratings, for which almost 90% of the land to be released is considered to result in very high, high or moderately-high harm and just 10% in moderate harm. It should be noted that we have concerns about the ratings given for purposes 2 and 3 (for which all the land scores are assessed as either moderate or weak). We believe TF 26, TF 29 and TF35 should be scored as “strong” for both these purposes.

JPA33 will result in green belt purposes (a), (b) and (c) being weakened significantly. The planned developments will also not comply with NPPF paragraph 137 as the construction of warehousing will severely impact openness. Document 07.01.25 (c3, p113) states that the allocation will *“reduce perceived settlement separation”*, and that *“the overall impact of the Allocation here will still be very high”*.

The proposed 4 major new roads on, across and around Carrington Moss, will exacerbate this issue as the documentation for the Carrington Relief Road suggests that the road will be elevated and those roads will also add to the confusion about boundaries as they will cut through the site in various places, permeating any perceived separation of communities. Furthermore, they will fracture what is currently a wide, open landscape, balanced by copses, corridors and coverts of trees and a number of public rights of way.

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

There is no justification for Green Belt to be released where sites will not come forward within the plan period (PfE paragraph 6.34).

Inconsistently, Trafford Council has objected to the construction of the M56 Services (22/0872M) on the grounds that *“it would be inappropriate development in the Green Belt, harming openness and visual amenity, and would harm the setting of the Watch Hill Scheduled Ancient Monument and there would be no very special circumstances that would outweigh the harm to the Green Belt and other harm. Trafford Council also raises concern about the potential impact on Altrincham, Hale and Bowdon centres, and the impact of additional traffic on roads within Trafford”*.

Interestingly, Trafford does not appear to be concerned about similar impacts to be caused by the developments at New Carrington.

Harm to Peat Moss at New Carrington

One of the tests of soundness is that there should be a reasonable prospect that the various PfE policies (including the allocations) are deliverable. Given the marginal viability of the site, the government's aspirations to protect peatland soils and the lack of progress being made by GM in the achievement of its 2038 Carbon Neutral Target, we believe the development proposed at New Carrington is unlikely to deliver the supposed benefits but that peatland restoration, in line with Natural England's advice, would be extremely advantageous for all stakeholders.

New Carrington Justification



The planning inspectors' conclusions, however, currently seem to suggest that they believe it would be more beneficial to damage or destroy the peat than to restore it. We disagree, especially given that you can only generate new peat on a peatland base, making this habitat not only irreplaceable but also unique.

As an alternative, one of the many advantages of carbon sequestration via peatland is its own negligible carbon footprint. There is no requirement for manufacturing of major technology or equipment and no ongoing use of fossil-fuel based power (although we do recognise that restoration techniques might involve some initial machine-using groundwork and some installation of plastic dams or pipes). Peat mosses require relatively low maintenance, perhaps some weed incursion control, but mostly it is over to the forces of nature and time to deliver the benefits.

With that in mind, Carrington is a gap in the corridors/stepping stones being created by the Great Manchester Wetlands Nature Improvement Area. It is essential to achieving the 50-75% restoration needed to meet the 2038 Carbon Neutral target (OD36), which is also mentioned in GM's 5-year Environment Plan. Even PfE recognises that "*lowland raised bog is now one of Western Europe's rarest and most threatened habitats*", and that our peatlands sustain a unique range of wildlife.

The government is not only committed to protecting and enhancing the Green Belt, they are ["investing over £50 million in peat restoration, building on its pledge to restore approximately 35,000 hectares of peatland in England by the end of this Parliament, and leave the environment in a better state for future generations"](#).

In addition, in their response to the [CCC Annual Progress report](#) (2023, Priority R2023-171), which requested a "*comprehensive delivery mechanism to address degraded peatland and extend current restoration ambition*", the government stated that "*Defra set out an ambitious target for peat restoration in England in the Net Zero Strategy to restore approximately 280,000 hectares by 2050 (including all upland peat). Natural England will publish a Peat Restoration Roadmap in 2025 to set out a clear and comprehensive trajectory for peat restoration in England and how this will be achieved*".

Furthermore, the [England Peat Action Plan](#) states that the government wants "*to ensure that the value of peatlands is taken into account when development is considered*" and that it is "*vital that planning policies reflect the importance of managing peatlands and avoid detrimental climate, water and biodiversity impacts from development*". The document continues that the government wants to "*ensure that further steps are taken through policy and guidance to protect peatlands, including those which are damaged but recoverable, from potentially damaging development that would hinder restoration and recovery of the habitats and species*".

We do not believe the government's intentions have been taken into consideration when allocating the New Carrington site. The area hosts a considerable extent of restorable deep peat, which Natural England suggests (OD42) is 335 hectares (with 105 hectares proposed for development).

Approved planning applications have highlighted the depth of the existing peat deposits. Heath Farm Lane (planning application 94949), within the allocation area called East Partington, found that "*peat is present in thickness of up to c 2.5m in the eastern end of Area B, either at shallow depths, or underlying bunds. Peat is also present locally in the western half of Area B, generally in thicknesses of <1m*" (Ground Conditions p8).

Natural England's advice to the GMCA states "*The GM Peat Pilot showed the carbon storage within lowland peat within Greater Manchester to be between 1,500 – 2,000 tonnes per hectare Carbon equivalent for 50cm depth of peat. Carrington Moss is significantly deeper than this*".

They also advise that "*As a large, continuous peat mass currently under suboptimal management, Carrington Moss provides an ideal opportunity to explore alternative land use scenarios that will assist the City Region in achieving net carbon neutrality by 2038, while providing other ecosystem services through improved ecological function of the peat*".



Natural England recommends restoration and expansion of the existing relic bog remnants, which would need appropriate buffers and areas of supported associated habitat, to support significant carbon storage. They also suggest that there is *“the opportunity to consider and set up a contiguous large area of Carrington Moss as a habitat bank for BNG, and for carbon trading.”*

It is clear that Natural England are **THE** peatland experts, their advice should have been given much higher weighting by the planning inspectors and should have been followed throughout the spatial planning process, including within site selection. The Natural Environment Topic Paper, for example, states (paragraph 3.52) that *“the GMCA engaged Natural England for advice on how the joint plan should plan positively for soil resources”* and (at paragraph 3.54) Natural England advised that the plan should:

- Safeguard the long term capability of Best and Most Versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) (i) as a resource for the future.
- Avoid development that would disturb or damage other soils of high environmental value (Specifically areas of Deep Peaty Soils that contribute towards a functioning ecological network for Greater Manchester's Uplands and Lowlands, which provides natural capital benefits such as carbon sequestration and storage).

Furthermore, the concluding Observations from Richard Lindsay, Head of Environmental & Conservation Research, Sustainability Research Institute, University of East London (OD42c) highlights the following:

“5.1 Some of the most seemingly fundamental issues raised in the Statements of Common Ground against the Natural England proposals appear to be based on mis-apprehensions of what Natural England is proposing, based on a mis-understanding of how peatland systems function or based on a poor understanding of what is currently being undertaken within the new and expanding field of paludiculture.”

5.2 In terms of peatland ecosystem processes and current paludiculture practice, there are no evident constraints to what Natural England is proposing – indeed the proposals are very much in line with UK Government commitments within the UK 25-Year Environment Plan as well as the UK Government's commitments under the UNFCCC Paris Agreement and the UK's Nationally Determined Contributions to reducing carbon emissions.

*5.3 In contrast, the development proposals give no clear mechanisms of, **nor evidence for, the argument that such development will reduce or halt carbon emissions from the affected soils.** Carbon emissions from soil mixing are not presented (perhaps because they have not been measured) while full life cycle analysis (LCA) of the development compared with re-wetting the remaining peat soils is not covered within the various Statements of Common Ground”.*

In the Statement of Common Ground for New Carrington (GMCA89), Trafford contradict themselves by suggesting that they cannot restore/create wetland in areas of deep peat that are allocated (paragraph 5.5) but they can restore peat in areas that are not allocated (paragraph 5.6). Trafford also suggest (paragraph 5.6) that there *“are also eight SBIs within the allocation, which have policy protection from development”*. Yet one of the SBIs within the allocation area has been proposed for development, so clearly, this is also incorrect.

Trafford states (paragraph 5.8) that *“there will remain sufficient opportunity within the retained Green Belt to create wetland habitats and/or restore pockets of peat habitat preventing stored carbon being emitted as CO₂, whilst balancing other needs, constraints and planning considerations”*. This will be challenging given the amount of retained Green Belt that is not available for compensatory restoration and the level of mitigation needed for the loss of thousands of trees and wetland habitats, the mitigation required to address any damage to the SBIs/SSSIs and, of course, the size and scale of the peatmoor.

Natural England's advice is that *“Development on peat will cause permanent damage”* and *“will destroy a much larger area of habitat than the actual footprint of development due to hydrological dependency/linkages.”*



Harm to Natural Capital Assets

GM has undertaken no assessment of the loss of Natural Capital Assets or the impact on Ecosystem Services as a consequence of the PfE Plan, despite **GM's 5 year Environment Plan** setting out the responsibilities for Local Authorities, including:

- “GMCA and LAs will **embed a natural capital approach into strategy and plan development**
- GMCA and LAs will support peatland restoration approaches and provide a clear framework for approach and delivery as part of a resilience strategy”.

The 5YEP also aims to prioritise action to “*protect, maintain and enhance our key natural assets*”, including restoring “*50-75% of our peatlands*”.

Trafford's Natural Capital Account states that “*a natural capital approach is about everyone understanding the benefits – ensuring the protection and enhancement of natural assets are fully considered in decision making*”. So, in addition to the issues raised in the section above, the plan should have taken full account of the natural capital value of peat, incorporating all the other ecosystem services it provides and should have evaluated the other natural capital benefits and ecosystem services of the Green Belt land to be released.

The extensive natural capital assets at New Carrington include its:

- soil resources (the peat mass and the Grade 2 best and most versatile agricultural land)
- vegetation, including extensive woodlands, hedgerows and other plants
- natural flood management and carbon capture capabilities
- ecological corridors, which sustain the habitats of over 25 red listed birds and a number of endangered/protected wildlife species, insects and reptiles
- ability to reduce the impact of air, noise, light, vibration and water pollution in the surrounding areas
- active travel routes, which are used extensively for walking, cycling and horse riding (there are over 1,000 horses stabled on and around Carrington Moss)
- access to nature-based recreational activities which provide physical and mental health benefits to local communities, including social prescribing
- access to nature-based volunteering activities and outdoor learning for schools
- preservation of heritage assets
- extensive landscape views, which are typical of lowland mossland habitats.

Our own, very conservative, estimates suggest that Carrington Moss accrues over £15m in natural capital benefits each year. We understand this benefit is not included in the £71m figure calculated by Trafford. They have decided not to capture all assets but have identified those they believe represent “*the most critical in an urban context*”. This is consistent with the approach taken by PfE, which completely ignores our rural communities, the rural economy and rural assets, including the associated natural capital benefits.

We note that no sites have been specifically allocated in the plan to enhance Green Infrastructure or to support nature's recovery. The allocation policy (criterion 33) does not currently set out the importance of Carrington Moss to the Great Manchester Wetlands Nature Improvement area (GMWNIA). The publicly available mapping for GM's Local Nature Recovery Strategy shows existing habitats and opportunities for enhancement. Carrington Moss is essential to supporting the delivery of the objectives of the GMWNIA because of its location and its ability to support wetland creation and, ultimately peatland, restoration. Yet, the current plan is to destroy historic wetland habitats, then create new areas of wetland. This is totally irrational and will require funding from the public purse.

Neither Trafford, nor the GMCA, have a clear understanding of what will be lost to development in New Carrington. We disagree that a comprehensive evidence base was assembled (07.01.25, paragraph 1.8). The majority of the natural capital assets of the site have not been measured and there are many data omissions in addition to those already mentioned in the sections above.



Every GM Local Authority, Health Authority and the GMCA has declared a climate emergency (the GMCA has also declared a biodiversity emergency). The GM Strategy states that “**Climate change is the single biggest threat that we face**”, yet GM’s leaders are supporting a plan that will significantly increase carbon emissions, cause a huge surge in air, noise, light, vibration and water pollution, and will expand the number of areas with the potential for localised flooding. PfE will also destroy irreplaceable habitats, will remove best and most versatile agricultural land and will see thousands of trees felled. None of these actions is compatible with those declarations nor with their carbon neutral goals.

During the PfE Examination, at a time when decarbonisation should be top of the agenda, the GMCA backtracked on published policies (net zero policies will now be subject to financial viability, the ‘get out of jail card’ used by developers to avoid planning policy obligations). In addition, the weakening of the brownfield first policy could result in more Green Belt release, with the associated increase in carbon emissions.

In the absence of any evidence of a quantitative assessment by the GMCA, communities highlighted the approach taken in the [Greater Cambridge Plan](#), an Authority which **did** conduct quantitative modelling of the carbon impact of their different spatial options. This Authority was dismissed as an outlier, rather than heralded as setting a standard that other plans should be following.

Steady State Manchester has analysed the relevant data and has produced a report which sets out the [Carbon Implications of Places for Everyone](#), showing that the 2038 carbon neutrality objective is unlikely to be met. The report concludes that GM is likely to over-run its carbon budget and that Places for Everyone will exacerbate the problem. This has been corroborated by two recent reports published by the GMCA:

- The [Greater Manchester Strategy Progress Report July 2022](#) – which states that the carbon emissions data confirm that GM is currently behind where it needs to be in order to achieve the 2038 Carbon Neutral Target
- GMCA’s [Overview and Scrutiny Committee March 2023](#) highlighted that “*Whilst there is greater understanding, the collective efforts required to achieve carbon neutrality by 2038 are not evident across the breadth of thematic areas and activities at present, with the need for greater whole system responses and actions necessarily ‘pivoted’ to meet this agenda*”.

Places for Everyone does not deliver this and the Integrated Assessment does not assess compliance with identified pathways to carbon neutrality, nor does it undertake any quantitative assessment against the 2038 carbon target itself, neither does it identify the need to restore 50–75 percent of the peatland across the conurbation in order to achieve the 2038 Carbon Neutral Target. It is, therefore, ineffective in meeting its objectives.

Document 10.09.07 notes (paragraph 8.4) that the New Carrington allocation performed negatively against IA objectives for resilience to the effects of climate change, reducing risk of flooding and conserving/enhancing landscape. This will certainly be the case post-development. The area currently performs very positively in terms of supporting the resilience of the Authority.

The proposed developments will, however:

- compromise the quality of our natural environment, causing biodiversity loss
- displace globally threatened birds/wildlife species, diminishing their foraging sources and putting their populations at further risk due to increased traffic, pollution, footfall and disturbances
- severely limit access to green spaces and social prescribing destinations for GM residents, including vulnerable and deprived local communities
- significantly impact the health and wellbeing of GM residents as a consequence of increased stress, increased pollution and the potential widespread and frequent surface-water local flooding.

New Carrington Justification



There will also be a huge impact on sports and recreational activities. Much of the retained green corridor at New Carrington is not accessible to the general population as it hosts a number of commercial/sports organisations. Document 07.01.20 (page 13) confirms that there are “*relatively few areas identified as OS Open Green Spaces and therefore likely to be accessible to the public within both the retained Green Belt and 2km from*” the allocation.

The allocation does not comply with NPPF paragraphs 98 and 99 (nor NPPF 31), as the required up to date assessments are not available. The area is used extensively for active travel, with the Transpennine Trail/Sustrans Route 62 running through the site. JPA 33 also does not comply with NPPF paragraph 100, as the proposed development will fracture existing PROWs, impacting numerous users and walking/cycling/horse riding next to busy roads will be unhealthy, unpleasant and unsafe.

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

Trafford has not made the overall flood risk and drainage strategy for the site available but we recognise it will need to be compelling given the water levels consistently present on the mossland. The government’s [planning guidance](#) has recently been updated and Councils will need to demonstrate developments will be safe from flooding for their lifetime, will not increase flood risk elsewhere, and, where possible, will reduce flood risk overall.

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

Furthermore, having been previously reviewed twice by planning inspectors, and found to be unsuitable for development, the land at Warburton Lane is inappropriate for inclusion in the allocation. It is performing purposes a, b and c (NPPF paragraph 138) and should be designated as green belt, along with other protected open land within the allocation area.

Harm to Landscape Character at New Carrington

The allocation policy criteria and associated reasoned justification must be effective in protecting the landscape character from harm. We do not believe this is currently the case. The modifications to paragraph 11.343, for example, are ineffective and, therefore, unsound. The words “*have regard to*” are not strong enough given that this plan includes warehousing for which there is currently no maximum height defined within the plan.

Policy JP-G1 states that “*Development within a Landscape Character Type, as shown on Figure 8.1, should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location*”. This is not what is being proposed for New Carrington, despite the typical mossland and lowland farmland landscape characteristics. It is also anomalous to suggest that specific parts of the allocation area and the views “*south to Warrington and Cheshire*” are more important than other parts of the allocation. The whole of the Green Belt area is typical of the mossland and lowland farmland landscape character type and the resulting “*sensitivities*” should be considered across the whole allocation area.