



6th January 2025

Dear Development Management

Planning Application 109755 Loss of SBI

We would like to submit our updated objection to this planning application, given the additional documents added to the planning portal. Our previous objections (31st December 2022 and 29th October 2023) remain valid, and we would encourage you to review them again. We have added further commentary below and hope you will give it careful and conscientious consideration.

Supplementary Planning Statement and other additional documents

We welcome this document but feel it lacks independent analysis. We appreciate the recognition (paragraph 4.2) of the "*tension with part of Policy JP-G9 and criterion 32 of Policy JPA33*" but cannot agree with the conclusions reached.

We ignore the comments on the weight to be afforded to PfE as it has now been adopted.

The document repeatedly states that "*the development plan must be read as a whole*" and we recognise that the LPA "*has to make a judgment bearing in mind such factors as the importance of the policies which are complied with or infringed, and the extent of compliance or breach*"¹, but ...

the most important criterion in the New Carrington Policy is Criterion 1.

Trafford Council has committed to delivering a masterplan in consultation with the local community. A masterplan that includes "*consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on parts of the site*".

It would be a huge breach of trust for the LPA to approve planning applications prior to the completion of the masterplan process.

Paragraph 1.8 of the Updated Planning Statement suggests that the Council has "*has resolved that development can come forward ahead of the masterplan provided that it would not prejudice the masterplan*". We have submitted a Freedom of Information Act request for confirmation about where and when this resolution took place. Further information in the Updated Planning Statement discusses options agreed at Committee but they are related to development coming forward in advance of the CRR being approved.

We note that the NPPF (paragraph 48) requires "*planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise*". The material considerations set out by the applicant do not balance the unproven economic benefits of the scheme with the known environmental harms to be caused and the inequity that would be experienced by local communities if JPA30, policy criterion 1 is disregarded.

The applicant's assessment (Updated Planning Statement, paragraph 6.114) that "*the proposed development would not prejudice the masterplan*" only considers the built environment aspects of the scheme, not the wider issues related to ecology and biodiversity.

Approving this development **would** prejudice the masterplan as there have, as yet, been no discussions in the masterplanning workshops about the Natural Infrastructure Strategy, no discussions about the mitigation and compensation approaches, the locations to be set aside for those purposes and when the benefits are expected to materialise.

¹ Regina v Rochdale Metropolitan Borough Council [2000] EWHC 650 (Admin) quoted in the document



Disregarding criterion 1 would also set an enormous precedent which would enable all developers to bring forward other schemes in advance of the completion of the masterplanning process, would completely disadvantage local communities and would render PfE impotent (and a total waste of the millions of pounds of public money spent on it over the 10-year preparation period).

The applicant asserts (paragraph 3.37) that the site is identified for employment use on the indicative allocation plan (now picture 11.46). This graphic does not show **any** of the 15 SBIs or the SSSI that will be impacted by the allocation. This is, therefore, not justification for supporting a conclusion that the scheme is in accordance with the development plan. We consider that this development **does** constitute a 'departure' from the development plan and national policy for the reasons set out in the following paragraphs.

Ecology

It is of note that the Greater Manchester Local Nature Recovery Strategy (LNRS, page 44) shows the SBI site within this scheme as a Core Local Nature Recovery Site (and large areas within the New Carrington allocation as Opportunity Areas for Nature Recovery). This demonstrates how important it is to complete the masterplanning process prior to approving any planning applications in the allocation area. In fact, criterion 25 of the JPA30 policy highlights the importance of the area and the role of the allocation in the context of the LNRS for Greater Manchester.

The applicant's assessment of compliance with criterion 1 (paragraph 3.39) ignores the cumulative impact of the overall development in the allocation area. Criterion 1 does not suggest that schemes should be taken forward on a piecemeal basis. It clearly states that the masterplan should "*ensure the whole allocation is planned and delivered in a coordinated and comprehensive manner*". Furthermore, on a like-for-like basis, the mitigation/compensation should deliver an SBI, not just a BNG exercise and a wildlife corridor.

The applicant suggests that "*there would be no tangible land use planning harm of allowing this particular development to come forward ahead of the masterplan*". Given the size and scale of the overall developments planned in the allocation, it is possible that this land could be identified as critical to the LNRS and the mitigation/compensation requirements for the overall allocation area. It is premature to come to the applicant's conclusion when no Natural Infrastructure Strategy for the whole allocation is available (especially given that no allocation-wide Preliminary Ecological Appraisal (PEA) was undertaken at the planning stage).

It is, therefore, wholly inappropriate for this, or any other, scheme to be approved in advance of the masterplanning process being complete.

It is also of note that the GMEU remain of the opinion that the application should be "*refused on nature conservation grounds, to avoid the loss of a substantive part of the SBI and consequent losses to protected and priority species and habitats*". This affirmation has been made on the grounds that the mitigation hierarchy should be applied, with avoidance being the first option, that SBIs should be protected and enhanced, that there are "*inherent uncertainties involved in habitat creation, particularly over the long-term timescales involved in this case*" and the cumulative issues to be caused by the wider plans for development at New Carrington



The GMEU response dated 29th November 2023 recognises that the “applicant has acknowledged the high nature conservation value of the site in the ES, and has proposed outline compensation for losses to the SBI, and mitigation measures for potential impacts on the area of the SBI which will remain”. The letter continues, stating that “The additional survey information has confirmed that the development proposals will cause significant harm to biodiversity by requiring the loss of a substantive part of a Local Wildlife Site (Wetland at Carrington Moss Site of Biological Importance), which has been shown to support priority habitats and protected and priority species”.

Natural England’s “No Objection” response is subject to Securing Mitigation Areas. This is a reasonable suggestion given the lack of a PEA covering the whole allocation area and the continued lack of a Natural Infrastructure Strategy to support the masterplanning process. Natural England advise that appropriate planning obligations or conditions should be secured in relation to mitigation, that a restoration management plan is produced, and that further investigation may be required. We support all these recommendations but would expect them to be completed in accordance with an agreed Natural Infrastructure Strategy for the New Carrington Allocation.

The applicant’s response to the GMEU comments is predicated on their continued insistence that there is a lack of alternative sites for this scheme (which we discuss below), that the GMEU is incorrect to state that there are “*inherent uncertainties*” in the creation of new habitat and that the site itself is isolated, limiting its ecological/biodiversity value (despite acknowledging “*the high nature conservation value of the site*” in the ES).

Paragraph 3.21 of the Supplementary Planning Statement suggests that the proposed mitigation approach is considered to have “*far greater ecological value than the existing woodland*”. Yet, there is no guarantee that the new habitats will be welcomed by protected or endangered species, they are settled in their existing woodland homes. Their limited populations will be decimated further by the huge level of development proposed for the mitigation areas (the site to the south of the Shell Pool, for example, will be subject to significant disturbance over the coming years, both during the construction and operation of other developments, and due to the noise pollution from the proposed BESS). This will bring significant challenges to reestablishing bird and wildlife populations in the area.

It is widely understood that creating new habitats is a challenging process which must be taken into consideration. This article² highlights issues such as pollution, climate change events and wider habitat loss as specific concerns, all of which will be issues for New Carrington. This example³ highlights that “*Creating habitats from scratch has greater risks of failure than we will often admit*”.

The applicant’s assertion that this is already accounted for is unconvincing. Without the allocation-wide understanding of the cumulative impacts of all the development proposed, and a strategy to address those, we are being presented with piecemeal solutions that may not provide the most appropriate environmental benefits or the mitigation/compensation necessary to address the aggregated effects.

Furthermore, the implied negativity in describing the woodland SBI as an “*isolated island of woodland*” (and “*of significantly lower ecological value*”, Updated Planning Statement p106) is an unreasonable assessment given the level of ecology and biodiversity present (including red listed birds and protected/endangered wildlife that have made this site their home). This site also currently provides a key link between Carrington Moss and the River Mersey.

² <https://www.joesblooms.com/the-challenges-of-biodiversity-conservation>

³ <https://cieem.net/wp-content/uploads/2019/03/Webinar-Creating-Habitats-for-the-Future-v2.pdf>



In addition, whilst paragraph 3.23 recognises that the scheme does not completely comply with PfE policy, it is disproportionately positive about the ecological/biodiversity benefits, especially given that some of these would not be apparent until many years after the destruction of the woodland SBI. The timing of the gains should be taken into consideration as protected and priority species will be severely impacted by the scheme. This suggests that paragraph 193(a) of the NPPF is also not complied with, along with many other policy requirements set out in section 15 of the NPPF (including, for example, 187(a) and 192(a & b)). It should be noted that the NPPF does not suggest the mitigation hierarchy only applies to irreplaceable habitats but to where significant harm to biodiversity results from a development.

Clearly, the Planning Inspectors examining the PfE Plan did not anticipate this development would be approved (we made them aware of the application in our representations) and they assumed the size and scale of the allocation area would enable avoidance of such a requirement. They commented in their report (paragraph 665) that *"There is no suggestion that development is intended to encroach into the SBIs. Moreover, the scale of the site is such that there would be ample scope to assess the effects of development through the masterplanning and planning applications processes and appropriately avoid, minimise or mitigate any potential impacts on biodiversity features within the site in line with relevant policies".*

The Planning Inspectors also expected (paragraph 673) that the harms to be caused at New Carrington would be minimised or mitigated in line with JPA30 and other relevant policies. This cannot happen if development is approved in advance of a masterplan being completed and the need for a Natural Infrastructure Strategy, covering the cumulative ecological impacts to the whole allocation area, is disregarded.

Employment

The harm to be caused by this development **can** be avoided as there **are** alternative sites and this development is **not** location dependent. Another option would be to reduce the size of the scheme to exclude the 6-hectare SBI element.

We refer to comments in our previous objection about the 'need' for employment space and Greater Manchester's 65% increase to the baseline need for warehousing land supply. In a great example of the need to continuously update the understanding of brownfield land availability, the Kellogg's site in Trafford Park (27 acres of previously developed land) is now amongst those available as an alternative to destroying a site of biological importance. Furthermore, the applicant itself highlights (Updated Planning Statement, paragraph 6.47) that there is a unit *"of 285,000 sq ft (26,515 sqm) at Voltage Park"*.

The repeated assertions from the applicant that there are no alternative sites are clearly developer propaganda, a biased interpretation exacerbated by their somewhat intimidating suggestions that Trafford should not look at sites elsewhere (*"with less harmful impacts on biodiversity"*) for developments such as this. It is unclear how *"such an approach could lead to a net loss of existing businesses from Trafford and a failure to attract new occupiers to the borough and Greater Manchester"*, nor is it clear how such an approach *"would also leave the borough with an inability to offer large scale sites that could generate large employment opportunities"*, if there are no other similar sites available.

Whilst we are encouraged by the Wain Estates commitment to the 'Trafford Pledge', we are conscious that employers elsewhere in New Carrington have not created jobs for the benefit of local residents (they have brought all their staff with them from their previous location). This means that local communities have suffered the adverse effects of the developments in Carrington (including huge increases to traffic, particularly HGVs, and the consequent pollution levels) without experiencing any benefits!



Lack of Sustainable Transport

One of the key reasons that this site remains inappropriate for this type of development (in addition to the harms to ecology and biodiversity) is the lack of sustainable freight transport options, which the applicant has not addressed in any of the updated documents despite criterion 8 (previously criterion 14) of JPA 30 requiring that development should “*Make provision for new and improved sustainable transport*”.

The Updated Planning Statement (paragraph 2.1) asserts that “*Wain Estates is the key landowner at New Carrington*”, yet the only infrastructure they mention is the Carrington Relief Road. Given the amount of HGV traffic the Wain Estates’ schemes will generate, it is astounding that they are not even highlighting the potential use of the former railway lines or the Manchester Ship Canal, within and adjacent to the allocation area.

There are many examples of very successful sustainable freight transport initiatives in other locations⁴. The lack of sustainable transport will cause huge increases in air, noise, light, vibration and water pollution, impacting the health and wellbeing of both humans and wildlife.

In relation to the traffic modelling, set out in various documents, including the Development Phasing Clarification Note, we are confused by the numerous figures and would welcome the opportunity to discuss these further. We have been doing our own traffic counting and modelling for the area and we fervently believe the lack of sustainable transport options, particularly for freight, means this scheme, and other HGV-dependent developments in the allocation area, cannot be considered to be sustainable!

We note the Local Highways Authority has raised concerns that “*the grant of planning permission for planning application 109755/OUT/22 may have an adverse impact to the delivery of the CRR*” and National Highways initially recommended that planning permission not be granted for a specified period to allow further time for discussions to take place with the LPA and the applicant “*to ensure the SRN remains protected from severe impacts of the development*”.

Whilst National Highways are still of the view that there will be a severe impact on the SRN as a consequence of this proposal, they have now updated their recommendation to suggest that “*conditions should be attached to any planning permission that may be granted*” to “*ensure the necessary highway mitigation is in place to cater for the entirety of the applicant’s developments in the area*”, once again supporting our view that the masterplanning process should be completed prior to approval of this planning application, to “*mitigate any severe or unacceptable impact from the development on the M60*” and to promote the use of sustainable modes of transport.

National Highways reference paragraph 115 of the NPPF, which requires that “*sustainable transport modes are prioritised*” and that “*any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach*”. Yet, as mentioned above, there are no sustainable freight transport options associated with the New Carrington allocation and the vision appears to be to create unsustainable car/HGV-dependent developments!

Carbon Emissions

The Supplementary Planning Statement suggests that it complies with policy JP-S2 (which aims to deliver a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions). The huge increase in HGV traffic means that the scheme will contribute to huge increases in carbon emissions (also impacted by the felling of hundreds of mature trees in the SBI).

⁴ <https://www.bbc.co.uk/news/articles/c1knr8ejzx0.amp>



Hazardous Businesses

Paragraph 3.69 suggests that the scheme fully complies with PfE policy JP-P1. Criterion 8 requires that development *“make appropriate provision for response and evacuation in the case of an emergency or disaster”*. Given the proximity of several hazardous businesses, and the increased risk to residents and employees as new developments come forward (the nearby BESS scheme, for example, could constitute a significantly increased fire risk), what are the proposals to meet this requirement?

Landscaping

Whilst we welcome the improvements to the landscaping it is clear from the visuals that the site will be highly visible (particularly in the winter months when the vegetation and leaf cover will be significantly reduced). The scheme remains non-compliant with JPA30, criteria 28, 29 and 32 (it may be possible to further reduce the height of the built environment, which would address this latter requirement).

Contamination

Paragraph 2.4 of the Updated Planning Statement confirms that *“Although the impact of the contamination in the application site is extensive it is less so than other areas of the wider Carrington Village and New Carrington”*.

We recognise that significant funding will be needed to clean up the site as this contamination could affect the health and wellbeing of those using the site (employees and wildlife) and could have a much wider impact, given higher concentrations in other parts of the allocation area.

The Environment Agency highlights⁵ that *“some PFAS have been reported to be associated with a range of human health effects, such as increased cholesterol levels, reduced immune response and reproductive effects”*. There are also huge concerns about PFAS finding their way into food and water sources.

Once again, this supports our assertion that the masterplan process must be completed so the cumulative effects of all potential risks are able to be fully assessed and mitigated.

New Carrington Natural Infrastructure Strategy

Given the enormous extent of the harm to be caused to ecology and biodiversity by this proposal, along with the extensive cumulative harms that result from other developments across the allocation area, it is essential that the application is not approved until the allocation-wide Natural Infrastructure Strategy is developed. This suggestion is supported by the GMEU comments (29th November 2023) that the uncertainty of outcome in relation to habitat creation proposed as part of the mitigation of this scheme is compounded *“by the wider plans for very significant new development across the proposed New Carrington allocation, which at the least will fragment the landscape, cause habitat isolation and potential increases in noise, visual and recreational disturbance”*.

⁵ <https://assets.publishing.service.gov.uk/media/611e31fbd3bf7f63b19cea2d/Poly- and perfluoroalkyl substances - sources pathways and environmental data - report.pdf>



It is, therefore, inappropriate to consider this planning application prior to an understanding of, and agreement on, the allocation-wide mitigation and compensation requirements. The lack of an allocation-wide PEA during the planning phase of PfE and the continued lack of a Natural Infrastructure Strategy to underpin the New Carrington masterplan is impeding consideration of the likely significant effects of development in the allocation area. As a priority, there is a need for locations to be identified to facilitate mitigation of, and compensation for, the harms to be caused by the loss of Green Belt, the damage to, or destruction of, irreplaceable habitat and the loss of, or damage to, ecologically/environmentally-rich land in the New Carrington allocation (including the thousands of trees that will be felled as a consequence of the proposed developments, the impact on 15 SBIs and an SSSI, the impact on the foraging and movement corridors and the breeding and feeding grounds of red listed birds and endangered wildlife). There will also be an impact on the mental and physical health of users of Carrington Moss, due to its transformation from a peaceful, healthy and safe environment to car/HGV dependent estates, resulting in huge increases to air, noise, light, vibration and water pollution.

In Summary

We are concerned by the rush to prematurely secure planning permission for a sensitive development that should be required to comply with the New Carrington Policies in the development plan. The PfE Plan Period is 17 years in total and, whilst we recognise that there are perceived benefits if this particular scheme is accelerated, there are also a number of risks, the main one being the lack of consideration of the cumulative effect of development on the natural environment across the allocation area. This planning application would require the complete felling of a woodland SBI, replacing it with a 22m high warehouse. This is not something that Trafford should approve without understanding the allocation-wide impact of such a decision.

The applicant's main intention appears to be to generate the funding needed to enable investment in other parts of the site, but this does not satisfy questions about why this scheme needs to include the SBI, nor does it render the applicant's assertion, that there are no alternative sites that could be considered, accurate.

We are not convinced that the mitigation for the loss of the SBI is appropriate given the potential timescales for the new habitats to be established and the lack of confidence in their ability to sustain the populations of protected/endangered species that will be displaced from their current 'homes'. The applicant's assertion (Updated Planning Statement, paragraph 6.56) that the overall residual significance of effects on ecology "*is Not Significant*" is rather irrational given the harms to be caused by this scheme. Furthermore, there is no suggestion that the mitigation/compensation arrangements will create a new SBI to compensate for what is being lost, which should be considered a requirement.

We believe that sacrificing even part of an SBI for development sets a very dangerous precedent, for the reasons set out in this and our previous objections (we provided commentary on the Counsel Opinion in our letter dated 29th October 2023).

The applicant suggests that "*it is not possible for the proposed development to be in accordance with a masterplan as required by criterion 1 of Policy JPA30, as the masterplan has not yet been adopted*". That is simple to remedy. The application should be paused until the masterplan is available. The applicant could also reduce the size of the scheme, by removing the woodland SBI parcel, which would make this application much more acceptable to communities, not only due to the ecological benefits but also because the built environment would be less visible on the landscape.

Kind regards

Marj Pownier (Chair), Friends of Carrington Moss