



Friends of Carrington Moss &lt;friendscarringtonmoss@gmail.com&gt;

## EIA SCOPING REQUEST 115256 Wain Estates Sale West

1 message

**Friends Of Carrington Moss** <friendscarringtonmoss@gmail.com>

10 January 2025 at 17:44

To: "Development Management (Planning)" &lt;development.management@trafford.gov.uk&gt;

Cc: "Gore, Richard" &lt;Richard.Gore@trafford.gov.uk&gt;

Bcc: Marj Pownier &lt;marj.pownier@gmail.com&gt;, Friends of Carrington Moss &lt;friendscarringtonmoss@gmail.com&gt;

Dear Development Management

We set out below our comments on this Scoping Request.

This is a comprehensive and useful report, and we welcome the detail included.

We think the developer has recognised that this scheme will have a huge impact on local communities and wildlife but we have the following comments for consideration in relation to the Scoping Opinion:

- Traffic and Movement:
  - With reference to EP2, no motor vehicles should be considered for access to Firsway or to Ashton Road (towards the SR2C allocation) as this will induce more traffic into those areas (and will destroy more woodland habitat, which will require mitigation/compensation). Active travel routes should continue to be the priority, with motor vehicle access to the scheme being via Carrington Lane (or the CRR if it is funded/approved).
  - The Transport Scoping Note (EP3, paragraph 2.2.3) states that the impact from hazardous/large loads "*is not relevant to the proposed development*" but there will be significant number of HGVs travelling along the adjacent A6144 (and/or the CRR) that are transporting hazardous materials, including, for example, the industrial gases carried by Air Products and the 700 HGVs a day carrying hydrogen from the Trafford Green Hydrogen facility. This should, therefore, be scoped in.
  - The current peaceful, pleasant, safe and healthy active travel routes on and around the vicinity of the site (both recorded and unrecorded public rights of way) will, in future, be more polluted and less attractive for active travel users. It should be noted that these routes are well used by horse riders, so any impact to their surfacing must take the needs of all users into consideration.
  - We are unclear about how the impact of the "*significant new travel demands*" on the Manchester Mosses SAC (PfE policy requirement) will be measured?
  - Section 3.7 talks about Pedestrian Delay. This can be avoided by provision of appropriate traffic calming schemes, including sufficient pedestrian, horse and cycle crossings.
  - Section 3.9 discusses Fear and Intimidation. It should be noted that the users of the public footpaths in this area will be from a wide range of local communities, including local schools who frequently visit the moss to understand issues such as sustainability, climate mitigation and ecology. This issue should also be considered in relation to wildlife, as there will be a huge impact on, for example, protected species.
  - Paragraph 3.14.1 states that traffic surveys will be undertaken in a neutral month. It should be noted that traffic numbers are significantly higher during term time than school holidays. We have evidence of this through our own traffic surveys.
- Water Resources:
  - Whilst EP 4 (Water Resources) mentions that the site visit of 12th November confirmed local ponding only in the northeast corner of the site. The vast majority of this whole site is currently under significant levels of water. Photographs can be provided if needed.
  - Mitigation measures will be extremely important, there is a huge risk of flooding for adjacent communities and a perceived lack of understanding about the amount of water captured and stored in this area

- Air Quality:
  - The Sensitive Receptor Locations need review. Air quality for those who live adjacent to this development area is currently very good but will deteriorate significantly as a consequence of both construction and operation. There are gaps in the current proposal where residents, including vulnerable citizens with respiratory illnesses, will experience effects of high magnitude.
  - The public rights of way through and adjacent to the site should be included as Human Receptors as there will be impacts to those using these routes during construction and operation of the site.
  - There is a perceived lack of knowledge about the ecology at, and adjacent to, the development location. The Manchester United Reserve (an undesignated nature conservation area) is adjacent to the site and should be considered an ecological receptor, as should Dainewell Woods, which host (among other things) bats and buzzards.
  - Table 6 should be updated to assume these ecological receptors will be scoped in (they should be classified as high importance and high magnitude of change).
  - We are unclear how PM<sub>2.5</sub> levels will be measured?
- Noise and Vibration:
  - Again, there are gaps in the proposed monitoring (EP6 Figure 1). Those homes closest to the proposed development (on the Epping, Fir Tree Avenue and Woodhouse Lane/Cherry Lane Estates) are not included. The noise and vibration will also impact wildlife and birds.
- Light Pollution:
  - Given the dark skies in this area, the presence of bats (particularly in Dainewell Woods) and other nocturnal (protected) species, and the huge impact this development will bring, we would expect light pollution (in relation to the ecology and nearby housing) to be scoped in. We cannot find any reference to light pollution in the document.
- Landscape and Visual:
  - The assessment should take into consideration the impact on those using the active travel routes in the area, particularly horse riders, whose line of vision will be higher than others.
- Ecology and Nature Conservation:
  - The document states that "*It is clear that development of this allocated site cannot entirely avoid the full extent of peat on the Site*". In fact, land-take could be reduced (and density increased) to minimise tree, peat and wetland loss and the overall impact to the natural environment.
  - We disagree with the reptiles and invertebrates being scoped out. Part of the site is wet woodland, where we regularly see dragonflies, for example.
  - We are very disappointed by the statement (paragraph 4.46) that the Grade 2 agricultural land/modified grassland is considered to be of "*negligible importance*". There is a large presence of ground nesting birds in this area, including the skylark. Even school children recognise the value of habitat to support these threatened species! Other habitat of "*negligible importance*" is also sustaining red listed bird species.
  - There is the presence of protected wildlife species to the southwest of the site.
  - As mentioned above, the Manchester United Reserve (an undesignated nature conservation area) is adjacent to the site, it has a boundary fence (limited access) and should be considered an ecology receptor.
  - This site is expected to be an opportunity area in the Local Nature Recovery Strategy.
- Ground Conditions:
  - Whilst we acknowledge the comment (in EP9 Ground Conditions) that Agricultural soils will be assessed separately outside of the ground conditions and contamination chapter, we cannot find where this will be assessed in the EIA.
  - Given that the project will impact land that is classified as bmv agricultural land (Grade 2) and it will affect the function and quality of the soil as a resource, this should be scoped in.

- Climate Change:
  - Whilst we appreciate that some climate issues will be addressed in other chapters and that others will be dealt with via planning conditions, we are concerned that "*it is considered that both construction and operational climate change matters can be scoped out of the EIA*". We believe that this matter should be scoped in to summarise the implications and determine the cumulative impacts. Covering issues such as the energy and nature solutions related to the built environment (solar panels, swift bricks, etc) in one chapter, peat in another, flooding in another, could lead to gaps that are not assessed.
- Socio Economics:
  - The impact on jobs and businesses in the rural economy should be scoped in, along with the impact on school places and health services (including dentists).
  - Whilst the PfE Reasoned Justification (paragraph 4.73) suggests that development must be "*fully integrated into the existing Partington and Sale West areas*", so that, as mentioned in the letter, "*its regenerative potential is maximised and existing and new communities are not separated*". This is not possible here because this land is within the Carrington Parish Council boundary. It should, therefore, not be considered to be a Sale West development. Carrington Parish Council will, for example, benefit from any CIL monies accrued.
  - There is also a clear separation from the existing Sale West community because of the existing woodland (Dainewell Woods, Firs Wood) and the Transpennine Trail.
- Cumulative Effects:
  - Given the lack of a Preliminary Ecological Appraisal for the whole of the allocation area during the plan-making phase, and the lack of a Natural Infrastructure Strategy to underpin the New Carrington Masterplan, we are concerned that the cumulative impact to ecology and the environment will not be fully understood. Mitigation and compensation (for damage to peat, and the felling of thousands of trees, for example) should be agreed in alignment with the Natural Infrastructure Strategy for the allocation. We are unclear how this issue will be covered by the EIA.
- Draft Development Plan (EP2)
  - The graphic shows a 'Secondary Road', to the north and west of the development. We are not clear which road this is referring to.
  - As mentioned above, there should be no access for motor vehicles via Firsway or to the wider mossland (Ashton Road – noted as access to SR2C allocation on the graphic).
  - Unless the attenuation ponds shown on the graphic are very deep (which could be dangerous for local communities), they will be insufficient to capture all the water currently stored on this site.

--  
Kind regards

Marj Pownar

Chair, Friends of Carrington Moss (<https://friendsofcarringtonmoss.com/>)

Vice Chair, Save Greater Manchester Green Belts Group (<https://www.savegmgreenbelt.org.uk/>)

Vice Chair, Community Planning Alliance (<https://www.communityplanningalliance.org/>)