



Friends of Carrington Moss <friendsofcarringtonmoss@gmail.com>

Planning Applications 115154 Land West of Warburton Lane and 115155 Land East of Warburton Lane

1 message

Friends Of Carrington Moss <friendsofcarringtonmoss@gmail.com>

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To: "Development Management (Planning)" <development.management@trafford.gov.uk>

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Bcc: Marj Powner <marj.powner@gmail.com>, Friends of Carrington Moss <friendsofcarringtonmoss@gmail.com>

Dear Development Management

The applicant states that the two applications have been considered "*as a comprehensive proposal*", and that the "*reader should consider the strategies laid out for each development together*". We have, therefore, created this single objection document **which covers both planning applications** and the comments below relate to both planning applications.

We confirm that **we object to these two Planning Applications** and set out below our reasons and comments.

Non-compliance with Places for Everyone New Carrington Policy

The very first requirement in the New Carrington Policy is that schemes within the allocation must be "*in accordance with a masterplan that has been developed in consultation with the local community*". That masterplan has not yet been published and there has not even been any discussion so far about the Natural Infrastructure Strategy (how we avoid, mitigate or compensate for harms to the huge number of natural capital assets in the area, including a 335 hectare peat moss, Grade 2 agricultural land, woodland and wetland habitats, along with the 15 sites of biological importance and the site of special scientific interest that will be impacted by the plan). Places for Everyone (PfE) says that "*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*" should be central to that masterplan.

Just one example of the issues that could arise if planning applications are prematurely approved in advance of the masterplan being developed relates to that requirement to strengthen ecological networks. Areas within the sites associated with these two schemes could be identified for nature restoration within the masterplan to ensure food, foraging and water corridors for wildlife are preserved. These may be different areas to those identified within the documentation due to the need to meet the requirements set out at Chapter 15 of the NPPF and the Greener Places policies within PfE.

The applicant recognises that such issues could emerge and anticipates (Planning Statement, para 9.29) that "*If the emerging Masterplan identifies that there is a need to locate other requirements for the allocation within the Site those will be known prior to the determination of the planning application*". This clearly acknowledges the prematurity of the submission of these planning applications.

Whilst the Planning Statement (para 9.27) asserts that the applicant is not "*aware of any evidence that suggests the proposed development would prejudice any other part of the allocation*", any planning application for the site would need to take those Natural Infrastructure requirements, for example, into consideration.

The applicant refers to the New Carrington Policy Criteria suggesting (PS, para 9.27) that "*work should be carried out in partnership with the Applicant, rather than imposed at the end of the process*". Yet, the applicant appears to now anticipate that their schemes will be imposed on the masterplan, and communities, in advance of its agreement!

Furthermore, the applicant wishes to use the Places for Everyone (PfE) Plan to assert that the principle of development in the location has been approved, and they want to use the PfE affordable housing policy because it is so much lower than that required by the previous policy (which Trafford say would apply if a premature planning application is submitted).

In relation to Affordable Housing, the applicant draws attention to Section 38(5) of the Planning and Compulsory Purchase Act 2004 which states that "*if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document*". It is, therefore, incongruous and unacceptable that the applicant wishes to cherry-pick criteria from the allocation policy in PfE.

In addition, the applicant suggests (PS, para 6.12), in relation to the potential for a higher than 15% proportion of affordable housing (which may be needed to satisfy the requirement for an allocation-wide figure of at least 15%), that the sensitivity testing being undertaken by the Council *"should be based on viability evidence that is agreed with interested parties prior to adoption of the Phase 1 Masterplan"*. Given that the outcome of this exercise may impact the densities and other aspects of the scheme, it is surely not possible to approve this application in advance of this work being completed.

The S106 Agreement cannot be finalised until the masterplan has been agreed as the infrastructure requirements may change following consultation with the local community. There is a huge assumption that the outcome of the public consultation on the masterplan will support, for example, the alignment of the Southern Link Road, see our comments below for more on this. The PS (para 7.15) confirms that the exact scope of transport related interventions will be set out in the masterplan, demonstrating that, given these and other, as yet, unavailable information, these planning applications are clearly premature.

We disagree with the applicant's assertion that the *"early delivery of this Site is also expected to improve local market conditions and fund infrastructure that will help unlock the timely delivery of the rest of the allocation"*. Elsewhere in the documentation, the applicant emphasises the minimal impact of these schemes on local communities. Other than construction, no employment opportunities will be provided. The provision of 15% affordable housing is pitiful (especially given the greenfield location). There will be no onsite public services. To suggest that funding from these schemes will unlock the timely delivery of the overall allocation is fanciful and should not be considered as a reason to approve these non-compliant schemes.

It seems that, if the applicant wishes to ignore compliance with PfE policies, and continue with a premature planning application, there could be an option to revert to considering the application against the Core Strategy. That document, however, states (p176), in the section headed Other Protected Open Land (R4.7), that the Council will *"protect the following areas of open land (that are not included within the Green Belt) from development"* and goes on to include the land in Warburton (immediately to the south of Partington) as well as the land south of Shell, Carrington. This would mean that these applications are still non-compliant with plan policy.

The ES (para 4.2.9) confirms the advice from Trafford that *"Evidence indicates development at Warburton Lane should form part of a later phase in the development of New Carrington to ensure it connectivity and to allow provision of necessary infrastructure (for example, the Carrington Relief Road to avoid severe highways impacts)"* and the Statement of Community Involvement suggests that Trafford's planning team has repeatedly raised issues about the potential prematurity of planning applications being submitted that do not comply with PfE policies.

In the Planning Statement the applicant criticises the working group for the Draft Warburton Neighbourhood Development Plan (WNDP), suggesting that the WNDP conflicts with the requirement to *"bring forward a PfE compliant masterplan for the whole of the New Carrington Allocation"*. Yet, the submission of these applications is not PfE compliant! Approving these applications would clearly set precedents that are far reaching for the allocation as a whole.

The NPPF para 125 highlights that planning decisions should *"recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production"*. This is certainly true of the land at Warburton Lane.

We also recognise that Greater Manchester Councils (including Trafford) have spent over 10 years (and many millions of £ of public money) developing and agreeing the PfE plan. There is no justification for applications to come forward that do not comply with its policies. If these schemes are approved in advance of a New Carrington Masterplan being completed, an audit should be carried out to determine whether the PfE exercise was a huge waste of public funds.

Viability

If developers wish to build in isolated, greenfield locations, they need to make the necessary contributions to all types of required infrastructure. If this results in the development being unviable, it should not be approved.

The applicant highlights that the *"viability of the allocation was proved to be critical at the PfE examination and it is vital that the Council does not undermine the delivery of the allocation by pursuing measures which are not feasible"*. We hope this does not signal an intention to renege on commitments to fund the necessary infrastructure, the costs of which appears to have been significantly underestimated.

The overall viability assessment for the New Carrington allocation was assessed as marginal during the PfE examination and those figures included a cost for the Carrington Relief Road of £56m (of which only

£15.5m was included in the viability calculation). It is now over £132m and another developer is already challenging their need to contribute the required amount.

The community has significant concerns that the Council or the Planning Inspectorate will approve these unsustainable developments, and the infrastructure will remain aspirational as it proved to be following the production of the Core Strategy and the UDP.

Concerns about the Veracity of the Statement of Community Involvement

At our online public meeting on 25th March, attendees raised concerns about the accuracy of this report. We provide some examples in this section.

It states (paragraph 3.16) that the applicant has "*chosen to engage proactively and extensively with*" a number of parties including Warburton Parish Council and Carrington Parish Council (there is no mention of Partington Parish Council)! This appears to be incorrect. We understand that there has been little engagement with Warburton Parish Council, which is confirmed by the applicant (PS, para 5.36).

The clerk has confirmed that the only engagement Partington Parish Council has had in relation to these applications is an invite to the local public consultation event. They have not received or been involved in anything further. This can hardly be described as proactive and extensive engagement!

The table at paragraph 5.33 suggests that only 7 of the people who responded were opposed to the development, but the actual feedback questionnaire (Appendix D, page 63 of the pdf), does not explicitly ask if people are supportive or opposed to the development. So that interpretation is rather disingenuous and, conversely, only one respondent thought the development was necessary and 8 responded that development should avoid building on farmland/greenfield sites. Traffic and infrastructure were a major feature of responses and 7 respondents felt the development was too large.

Induced traffic to be caused by the Southern Link Road

The NPPF requires that development proposals use "*a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places*". Paragraph 110 also requires sustainable development to offer "*a genuine choice of transport modes*". We do not believe this is satisfied by these applications. What is currently proposed is car-dependent sprawl that does not sufficiently take "*into account the environmental impacts of traffic and transport infrastructure*" nor does it take advantage of the "*opportunities for avoiding and mitigating any adverse effects, and for net environmental gains*".

Residents are very concerned by the prospect of a Southern Link Road that ultimately connects with the Carrington Relief Road as this will result in significant levels of induced traffic seeking to travel between motorways, a rat run which will not benefit either existing or new communities. This traffic will bring huge increases to air, noise, light, vibration and water pollution (and, of course, carbon emissions). The impact of this induced traffic does not appear to have been considered by the applicant. This is particularly important when considering the impact on Warburton Village, which does not have the potential to create cycle lanes, or even to improve the existing narrow and inadequate footpaths, making that induced traffic a clear threat to residents and cyclists. This issue has been ignored in the Transport Assessment, which suggests there is not an inherent road safety problem in the vicinity of the site (PS 9.101).

The documentation sets out various comments regarding the proposed route of the Southern Link Road and its integration with the development. We propose that the Southern Link Road is replaced by extensive upgrades to Sinderland Lane, Moss Lane, Paddock Lane and the A6144, including pothole maintenance and more pedestrian crossings, which would bring significant benefits to existing and new residents, would be much more affordable and would substantially reduce the potential for induced traffic through Warburton, decreasing the risk of accidents and the consequential costs to health and wellbeing and public services.

Furthermore, given its size, and the former railway lines, the New Carrington allocation should benefit from direct access to tram services to connect residents to other parts of Trafford and Greater Manchester. Additional bus services are also required to ensure the sites of these schemes are sustainable. Such a solution would align more fully with the requirements of Chapter 9 of the NPPF, including the requirement to make "*transport considerations an important part of early engagement with local communities*" and "*realising opportunities from existing or proposed transport infrastructure*".

The ES (para 9.6.24) suggests that it is not anticipated that any HGV traffic will be added to the road network. This ignores the impact of the connection of the Southern Link Road to the wider Carrington and motorway network. Should the Southern Link Road continue to be part of these proposals, it must have a surface suitable for horse riders, traffic calming schemes must prevent use by HGVs (especially

given that many of those from Carrington transport hazardous materials), and must discourage use by through traffic.

The impact of these schemes and the Southern Link Road on the Manchester Mosses SAC (PfE Policy JP-C8, criterion 17) is not mentioned in the documentation. This policy requirement must be met as the ES recognises that Holcroft Moss is located just 2.7km from the site. 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.

Lack of prioritisation of sustainable transport

To reduce car-dependency and promote sustainable transport and active travel options, there should be limited motor vehicle connections to and from the sites of these schemes. As mentioned above, the Southern Link Road should be replaced by upgrades to the existing road network, rather than becoming a key route between motorways.

The NPPF (para 117) states that applications for development should facilitate *“access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use”* and the New Carrington policy criterion 12 states that development will *“Contribute to new / enhanced bus services and deliver bus priority infrastructure within the site and, where appropriate, on bus routes linking to the site”*. The Planning Statement (para 7.13) confirms the importance of improving public transport and the need for major investment in active travel, public transport and highways infrastructure in the allocation area.

Yet, public transport is not being promoted as the preferred mode of travel, alongside active travel options, which is contrary to local, regional and national policy. We note that the *“need for a bus route through the western parcel”* was questioned by Places Matter and they also state that the *“Eastern road should be narrowed as onsite bus use is unlikely”*. It is the ‘vision’ that should change, not the aspiration for public transport preference.

The Transport Assessment (para 4.22) suggests that the development *“provides the opportunity for door-to-door sustainable journeys, as well as providing access to regional hubs”*. This is hugely optimistic given the infrequency, unreliability and lack of capacity of existing bus and rail services, many of which are not available from the sites themselves.

So, whilst the applicant suggests (PS 9.100) that, in the long term, the transport infrastructure improvements *“will have significant benefits for both existing and future residents”* and that *“This should be attributed weight as a benefit in the determination of this application”*. Provision of all such infrastructure is dependent on the funding being available, including from developers, and, given the current proposals offer insufficient public transport and will induce huge levels of motor vehicle traffic into the area, there will be no benefits (only increased traffic, pollution and accidents) for existing or new residents.

The New Carrington policy criterion 9 states that development should deliver *“a network of safe cycling and walking routes through the allocation and linking to surrounding areas, including utilising the Carrington rides, improving the Trans Pennine Trail and creating new/enhancing existing Public Rights of Way and bridleways”*.

We note that the applicant does not mention the needs of horse riders, despite acknowledging (ES 9.4.21) the bridleway linking Warburton and Partington. Given the huge impact to current horse-riding routes, due to the proposed New Carrington developments, it is likely that horse riders will have no option but to ride around/through housing estates. Provision for this should, therefore, be made now to reduce the potential for future incidents or accidents.

All roads within the sites (including the Southern Link Road) should, therefore, be surfaced to accommodate horse riders as well as walkers and cyclists. Pegasus crossings should also be installed at frequent points.

Provision of appropriate traffic calming schemes must be included in the scheme design, including sufficient pedestrian, horse and cycle crossings, to avoid pedestrian/cyclist delay or obstruction and any fear or intimidation of active travellers by aggressive motor vehicle users. Wildlife crossings should also be provided to ensure species are able to access their food and water sources.

Whilst the ES (para 9.6.27) assesses the impact of the development on non-motorised users as negligible, it should be noted that 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.

We welcome the confirmation (ES 9.5.5) that the 30mph speed limit zone will be extended by an additional 300m and agree that this will contribute towards road safety.

We are, however, concerned by the applicant's unreasonable assertion that the impact of their schemes on traffic flows will be low. This is isolated, car-dependent sprawl, with no services or jobs within the redline boundary and the Southern Link Road will induce significant levels of additional traffic, especially if connected to the Carrington Relief Road. The applicant is clearly uninformed about the route of the Carrington Relief Road, which will NOT, as suggested (PS 9.99), *"allow traffic to bypass central Partington"*, it will (as confirmed by Trafford) induce additional traffic onto the A6144 through Partington!

The Transport Assessments (TA) show that the A6144 is anticipated to operate over capacity (without further development). The Planning Statement (para 9.98) confirms that the modelling in the TA is compromised by that over-capacity. To address this, the applicant suggests (PS 9.99), rather irrationally, that *"several users would alter their behaviour (such as using alternative routes), thus the operation of the junction would effectively be self-regulating"*. Again, the applicant is clearly unaware of local issues as there are no alternatives. As mentioned above, this location is very poorly served by public transport and there are no other routes for those *"several"* users to take.

Rather strangely, the document also suggests (PS 9.99) that *"the development could come forward in lieu of the highway improvement required by PFE Policy JP Allocation 30"*. Perhaps they meant 'in advance of'?

The SCI confirms that the applicant has had feedback about the dominance of the road routes. We do not consider the dominance of roads has been sufficiently addressed in the applications.

We note that the ES (para 9.4.13) confirms that traffic surveys were undertaken in July 2024. The applicant does not confirm whether this was during the school holiday period or earlier in the 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.

The TA (para 10.32) suggests that the *"site access junction is predicted to operate well within capacity"* and (para 10.33) that the Warburton Lane / Moss Lane junction is also anticipated to stay within capacity *"under all tested traffic scenarios"*. This is unlikely if the Southern Link Road is connected to the Carrington Relief Road.

The TA (para 10.34) incorrectly suggests that the junctions that will continue to be over capacity *"will be relieved in the future when the highways improvements proposed as part of the New Carrington allocation"* are delivered. The induced traffic plus the consequences of building 5,000 homes and 350,000m² employment space in an unsustainable location, with no sustainable freight transport, no trams or trains and no committed funding for any public transport improvements make this aspiration impossible to achieve.

The lack of sustainable transport options will increase the impact of the construction of these schemes on local communities, for an 8-year period (ES para 9.6.3). This will particularly impact vulnerable residents, younger and older people (including pupils at nearby schools) who will suffer the effects of dust and increased pollution as the site will be served only via the road network, with construction traffic using the A6144 through Partington and, possibly, Sinderland Lane.

Whilst the ES considered that the effects would be temporary, it is incorrect to assume they *"would not be greater than those effects associated with the operational phase"* because the majority of the traffic is likely to be HGVs bringing materials to and from the site. These effects on the health and wellbeing of local communities should be measured and addressed in the CTMP, via a planning condition.

Whilst we applaud the aspiration to (ES 9.7.3) *"reduce the number of car journeys and encourage a shift to sustainable transport"*, we would welcome a detailed discussion with the applicant and other community stakeholders about the operational phase and the cumulative traffic numbers as they do not accord with our own calculations. The results shown are hugely optimistic given the lack of public services and amenities within the red line boundaries of the schemes. Furthermore, the ES (para 9.9.12) incorrectly suggests that the Carrington Relief Road *"is expected to reduce future baseline traffic levels along the A6144, which will improve capacity and reduce delays"*. Trafford has confirmed that the CRR will increase induced traffic, which will all be travelling along the A6144 through Partington.

Air, Noise, Light, Vibration and Water Pollution

The ES (para 9.6.23) states that *"it is not anticipated that the relative pleasantness of non-motorised user journeys will be affected"* due to the overall *"small increase in traffic on the local road network"*. Yet, a total of 558 additional homes (from the two schemes), with no trams or train services and insufficient bus services, and no onsite public services or amenities, will result in an additional circa 1,000 cars on local roads each day. This will have a major impact on the current safe, healthy and pleasant designated and undesignated public rights of way, which will suffer from huge increases in air, noise, light, vibration and water pollution.

The NPPF requires development to minimise pollution. There are specific policies including para 187, which suggests that decisions should, for example, be (e) *“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality”*. NPPF para 198 requires that decisions ensure new development takes into account *“the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development”*. The policy goes on to require development to *“mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”* and to *“identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”* along with limiting *“the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”*.

The PfE New Carrington policy criterion 36 requires that development incorporates *“appropriate noise and air quality mitigation particularly along major transport corridors”*. PfE Policy JP-S5 highlights that a *“comprehensive range of measures will be taken to support improvements in air quality”*, including, for example, *“Locating and designing development, and focusing transport investment, so as to reduce reliance on forms of transport that generate air pollution”*

The JP-S5 policy also requires that development is only permitted where pollution levels are acceptable and/or suitable mitigation can be provided and that development is *“located in areas that maximise the use of sustainable travel modes”* and *“designed to minimise exposure to high levels of air pollution, particularly for vulnerable users”*. For the reasons set out above, we do not believe the Warburton Lane sites meet these policy requirements, nor do they maximise the use of sustainable travel modes, these are car-dependent sprawl which will increase the impact of pollution on local communities.

There are also statutory targets for fine particulate matter (PM_{2.5}), which require a maximum annual mean concentration of 10 µg/m³ by 2040 and a 35% reduction in population exposure by 2040 compared to 2018. The lack of passenger and freight sustainable transport across the allocation area will make these targets challenging to achieve for Trafford.

Whilst the ES (8.6.5) recognises that the impact of Noise, Vibration, Odours, Dust and Construction Vehicle Movements is considered to be moderate, the construction phase for these schemes continues for 8 years and for other New Carrington developments, much longer! The overall effect of ongoing construction over a long period on all local communities will be extremely high, not just for their physical health but also for their mental health and wellbeing.

Whilst the ES (8.7.23) concludes that the impacts on Annual Mean NO₂, PM₁₀ and PM_{2.5} are predicted to be negligible, this is likely to be the outcome of the assessments for all schemes in New Carrington. Yet, cumulatively, there will be a significant increase in all pollutants due to both construction and operational effects.

Currently the location of these two schemes is tranquil and has intrinsically dark landscapes. The imposition of light pollution will, therefore, have a deep and lasting effect on species that have made the area their homes. The ES states (para 8.7.10) that routes will be *“well-lit in hours of darkness with required specifications to avoid unnecessary light spill”*. Sensitivity to the surrounding areas must be considered.

What must also be recognised is that the construction phase does not take account of all the construction traffic that will travel through Partington. Other schemes are likely to be approved for development within the same timeframe, including the Carrington Relief Road and possibly the Hynet Hydrogen Pipeline, both of which will result in significant construction traffic.

The Operational impact does not take account of cumulative effect of pollution caused by induced traffic using the CRR or the Southern Link Road.

Whilst there are targets, it must be recognised that there is no safe level of PMs. Given the road is already operating above capacity we believe a more detailed assessment of the significant effects of PM_{2.5} and PM₁₀ is needed.

Lack of evidence of sustainable development

We disagree that the site *“has been identified as a sustainable location for development through the plan making process”* (DAS p28). It has been identified as a site that can be made sustainable subject to the provision of appropriate infrastructure, which is yet to be funded, including by developers.

The applicant states (PS para 3.1) that the vision is to create a “*semi-rural village community*”, which, in addition to the lack of promotion of sustainable transport modes, is a surprising model as the [Cambridge Local Plan assessment](#) stated (page 21/18) that villages are “*likely to be the least sustainable option*” as they consistently score poorly against a number of Sustainability Appraisal objectives compared with the alternatives.

Whilst the Council makes the assertion that the developer needs to “*avoid visual dominance of cars within the scheme*”, avoiding visual dominance does not change the fact that the scheme is in an isolated, car-dependent, unsustainable location with no public or health services, amenities or employment opportunities within the red line boundary!

Given the very low percentage of affordable housing, and the even lower number of genuinely affordable homes to be provided, we do not believe the proposed development reflects the housing need in the borough. This is evidenced through the responses to the public consultation, which highlighted that “*When asked what types of homes would be of benefit to the area, 21%, of answers stated the need for ‘Housing for young people and first-time buyers’, followed by 20% of responses which emphasised the need for ‘Affordable housing for rent’. 17% of respondents stated the need for ‘Family housing’ and ‘Affordable housing for ownership’, with 11% responding ‘Smaller homes’.*”

There is also conflicting messaging within the design of the schemes, which are directly adjacent to Partington.

The Council is pushing for integration with Partington, despite the vast majority of the scheme falling within the Warburton Parish Council boundary. Whilst we recognise that many of the local services will be based in Partington (and beyond), the residents are most likely to integrate with those in their Parish Council rather than with the urban community beyond the scheme boundary, especially if the housing is designed to reflect the rural area.

The PS (para 9.10) states that the Site “*represents one of the few greenfield allocations in the Borough and it is essential that this land, which is a finite resource, is used efficiently and effectively, particularly in the context of a national housing crisis*”. Yet, this is not what is being delivered. The design of the scheme does not align with the street scene in Partington and does not take advantage of what is clearly an urban extension to increase density (and reduce land-take) to decrease the overall size of the schemes and minimise the impact on ecological and environmental assets, and the site of the medieval deer park.

The PS (para 9.19) states that this part of Trafford is characterised “*with a relatively high proportion of social housing*”. The land is in Warburton Parish Council, which has no social housing. The photographs shown in the Design and Access Statement do not include any that are typical of the urban area with which these schemes are expected to integrate. In fact, all aspects of the designs, from the boundary features to the roof types, appear to be aligned with those in the rural areas, not those in Partington.

The ES (para 8.7.60) suggests that “*the Proposed Development will physically adjoin the settlement of Partington which has a good provision of local social infrastructure, local employment opportunities and good accessibility. As described in the baseline, the Site is approximately 1km to the south of Partington Shopping Centre, which includes a range of local shops and services. The Site is well-served by existing public transport provision with bus stops located along Warburton Lane. An existing cycle lane is also provided along Warburton Lane, enabling easy access to Partington Shopping Centre via bicycle. The Proposed Development will have a beneficial effect on the existing shops and facilities in Partington and supports local bus routes*”. If this is the case, the housing will need to be priced at a level that can be afforded by those who work and shop in Partington. Contrary to this statement, Trafford has confirmed that New Carrington is poorly served by public transport.

The PS (para 6.20) states that the HNS identifies a need for 1 and 2 bed flats for affordable home ownership or social rent but to “*counterbalance the number of apartments being delivered in centres elsewhere in the Borough, the priority for this Site should be the delivery of family homes*”. Where is the evidence that sufficient 1 and 2 bed flats are being delivered elsewhere in the borough? It suggests that “*a flatted development would also not be keeping with the semi-rural character of the surrounding area*” but the scheme is meant to be integrating with Partington, not the rural area.

So, perhaps there should be some reconsideration of these inconsistencies (and, of course, 1 and 2 bedroomed homes do not have to be high rise flats), along with other improvements, to ensure that this development can be made sustainable.

Historic Environment

The NPPF requires (para 210) that LPAs recognise “*the positive contribution that conservation of heritage assets can make to sustainable communities*”. This is reinforced by the PfE Policy JP-P2,

which states that “*Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm*”.

Warburton Deer Park, which will be significantly impacted by these schemes, is specifically mentioned in New Carrington Policy criterion 33.

We do not believe this proposal recognises the underlying historical significance of the area, or its importance through the ages. The deep medieval connections in the location of Warburton should be acknowledged and preserved.

As mentioned above, we believe the design of the development can be updated to secure the future of this heritage asset that most certainly contributes to the distinctive identity of Warburton Village.

Landscape and Visual Impact

The distinction between Landscape and Visual elements of the assessment need to be clearer. The landscape effects deal with the effects of change and development on landscape as a resource, whereas visual effects deal with the effects of change and development on the views available to people and their visual amenity.

We do not believe this development protects and enhances the locally valued landscape as required by the NPPF (para 187) and the PfE policy JP-G1. The development should reflect the key characteristics of the Mossland and Lowland Farmland character type. We are particularly concerned that the height of the buildings will be increased by many buyers, using permitted development, because the roof spaces appear to be unused (and unusable). This will have a significant effect on both the landscape and the visual amenity in the area.

The PS (para 9.65) suggests that, **at year 15**, the proposed development would have a minimal adverse impact on the Lowland Wetlands and Mosslands Landscape Character Type and Settled Sandlands character area, a moderate adverse impact on the Site and its immediate setting and a moderate-minor adverse impact on the local setting. We disagree. The impact on the openness of the landscape will be major, especially given the surrounding flat Lowland Wetlands and Mosslands Landscape.

Whilst we welcome the buffers and other mitigations, we also disagree that (9.66), from a visual impact perspective, **at year 15**, there would be major-moderate to moderate adverse effects at the immediate boundaries. The impact will be extremely significant and the adverse effects major.

For the reasons set out above, the conflict with PfE Policy JP-G4 cannot be described as minor.

Ecological and Environmental Impacts

As highlighted above, there has not yet been any discussion about the Natural Infrastructure Strategy for the New Carrington Allocation area or confirmation of the approach to mitigation and compensation for the harms to be incurred. The issues related to ecological and environmental impacts are exacerbated by the lack of a PEA during the planning phase.

Many of the requirements of Chapter 15 of the NPPF have not been met within the planning process, including those related to paragraph 192. NPPF para 193 requires that LPAs apply a series of principles when determining planning applications, including the mitigation hierarchy. We firmly believe that harms to local ecology can be minimised or avoided by reducing the land-take for development and, therefore, reducing the impact to species and habitats.

The New Carrington policy criterion 25 requires that the allocation achieves “*enhanced delivery of ecosystem services through the restoration and creation of wildlife corridors, steppingstone habitats and areas of wetland within the site*”. As the Natural Infrastructure Strategy has not yet been developed, it is not clear whether any part of the sites of these schemes will be required to satisfy that policy criterion or whether the proposed improvements are sufficient to address the masterplan requirements. The ecological and environmental impacts for these schemes must be considered alongside the cumulative impact of all development within the allocation boundary. It is, therefore, premature to approve these planning applications.

We do welcome the confirmation (ES 11.7.2) that key habitats have been included but some of the impacts described as unavoidable, could be minimised by alternative designs to the schemes as mentioned above, including the loss of category A trees. The removal of the Southern Link Road, for example, would reduce the impact on *two groups of category A and B trees, a single category B trees and most of the scrub woodland*.

Extensive tree loss is expected by the applicant, and such habitat loss will be immediate. Replacement tree planting (which must be on a 2 for 1 basis in accordance with PfE policy) should require mature

trees (not saplings or whips) to provide mitigation for the losses endured by local species in the shortest possible timeframe.

Alarming, the AIA states (para 7.6) that the applicant's research indicates that there are no veteran trees or areas of ancient woodland recorded on or adjacent to the site. Yet the ES (para 11.11.3) recognises the adjacent SBI and Ancient Woodland Habitat, Coroner's Wood, which the GMEU describes as "*An area of lowland broadleaved woodland shown on the Ancient Woodland Inventory (Natural England 2007). Such lowland broadleaved woodland is a UK Priority Biodiversity Habitat*".

It is rather optimistic to assume that the Construction Phase will result in negligible adverse effects, given that there may be other construction activities occurring alongside those of these developments, although the applicant suggests (para 11.11.2) that "*No cumulative effects are anticipated during the construction phase*".

We are also concerned about the impact to the Sites of Biological Importance, including the ancient woodland, as a consequence of increased footfall and domestic pet disturbance.

The document suggests (PS 9.109) that the habitats within the site are common and widespread to the area. No consideration appears to have been given to the red listed, ground nesting bird species that are frequently sighted in the area.

The ES (para 10.4.5) suggests (incorrectly) that the agricultural land loss expected has been considered at a strategic level by the Council. There was no assessment of the impact on the rural economy or on the loss of agricultural land at the planning stage. In this part of the allocation area, the huge loss of BMV agricultural land equates to 38.2 ha (para 10.10.3), which the applicant recognises would be largely adverse, with a considerable loss of land to support our future food security having a significant effect.

Whilst we agree that the risk of encountering peat on these sites is minimal, the impact of any such outcome would be significant, not slight adverse (para 10.10.7), as hydrology changes could impact a much larger part of the peat moss than that found on the site itself.

We note the Biodiversity Net Gain commitments and request confirmation about how these will be monitored by the Council.

We believe there is insufficient consideration of the cumulative impact on red listed birds and endangered/protected wildlife as a consequence of the huge level of disruption to be caused to their breeding and feeding grounds during the development of the overall allocation (including, for example, loss of habitat for ground nesting birds and extensive disruption to wildlife homes, food and water sources and foraging corridors).

Climate Mitigation, Carbon and Flooding

With climate breakdown accelerating, more habitats and species will, in future, no longer be viable. We, therefore, need to make more effort to protect those that can be saved and provide ways for nature to adapt, not to mention enhancing the protection for the ecosystems on which human survival is crucial.

It is not a secret that the surface water flooding across the New Carrington allocation area is getting progressively worse, yet the Flood Risk Assessment (para 4.1.8) is very optimistic.

The FRA (para 5.8.1) states that there "*are indications that the climate in the UK is changing significantly, and it is widely believed that the nature of climate change will vary greatly by region. Current opinion indicates the likelihood that future climate change would produce more frequent short duration and high intensity rainfall events with the addition of more frequent periods of long duration rainfall*". We do not believe this statement is reflected in the assessment.

Mitigation measures will be extremely important. The introduction of the bridge into the model (4.1.11) is shown to locally increase the water level upstream of the bridge and whilst, 600m upstream from the bridge, the change is shown to be negligible. We are concerned that there is little understanding or recognition of the huge levels of water captured and stored in the allocation area. The assertion that no historical flooding has been identified (4.7.1) during their review of online sources is not a surprise given the lack of population in the area. Perhaps local people could be consulted.

The PfE New Carrington policy criterion 34 refers to the masterplan, which should be in place prior to the approval of the application to ensure flood risk and surface water issues are mitigated both within and beyond the site.

We are extremely surprised and concerned that the Flood Risk Assessment (page 93) states that the model data is "*taken from Altrincham 2009*" (and it refers to data from 2007) which is over 15 years ago. This does not provide up to date evidence that the requirements of NPPF para 170 have been met, including ensuring that the development is safe for its lifetime "*without increasing flood risk elsewhere*".

This data should be remodelled, with calculations based on more up to date information, prior to planning application approval.

Paragraph 163 of the NPPF states that planning applications should take into account *“the full range of potential climate change impacts”*. Yet, the Carbon Budget Statement appears to only consider the carbon effects of the buildings but not the consequences of the transport options. Again, this information should be updated and remodelled to provide a more reasonable assessment of the carbon implications of the development and its associated infrastructure, including the Southern Link Road.

The NPPF (para 161) articulates the requirement for the planning system *“to support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”*. Building on unsustainable, isolated greenfield sites does not support this ambition.

The lack of committed funding for sustainable transport and the low density planned for these developments does not accord with NPPF para 164, which states that new development should *“avoid increased vulnerability to the range of impacts arising from climate change”* and should *“help to reduce greenhouse gas emissions, such as through its location, orientation and design”*.

We also note that the text in the ES Design Considerations is taken from the previous ES, which should have been updated given the adoption of PfE.

Design Considerations

- 8.7.52 The risk of overheating has been taken into consideration and addressed through careful design of the buildings' construction type, layout, building services, ventilation and appliances. The dwellings have been designed to prevent overheating from the outset, as opposed to occurring at a later date.
- 8.7.53 Keenan, Jenny
This text is lifted from the previous ES, client to confirm if still applicable as there is no text included on this in any technical reports or ES chapters
The pipework for heating and hot water systems are well insulated to prevent any unwanted heat being emitted into the dwelling. The water cylinders used by Redrow are highly insulated; this prevents any build-up of heat from cylinder cupboards.
- 8.7.54 Building materials, such as brick, stone or concrete, do not soak up and store heat or cold. This can help stabilise the internal temperature of the house. In homes which have walls built of brick or stone, it takes several hours for heat from outside to pass through the walls.
- 8.7.55 Landscaping can have a significant effect on overheating in built-up areas. Concrete or tarmac can accumulate heat. Areas of soft landscaping should be incorporated into the site as a whole to help prevent excessive heat being built up. Trees will be used to shade buildings and outdoor spaces and surfaces so that they receive less solar radiation.

Hynet Hydrogen Pipeline

It is a huge assumption to believe that the schemes will be unaffected by the Hydrogen Pipeline (PS para 9.30). We believe more information is needed before such a conclusion can be reached.

Cumulative Impact of developments across the New Carrington Allocation

The ES suggests (8.10.11) that the cumulative impact of the development is *“considered to be long-term minor adverse and not significant”*. Whilst we understand the reasons for this, the ES for each development is likely to come to the same conclusion. This reemphasises the importance of the masterplan and a consolidated Environmental Impact Assessment for the allocation area.

When considering the cumulative impact of developments across the New Carrington Allocation, the Carrington Relief Road should be included. This seems to have been omitted by the applicant in their assessment. The cumulative impact of air, noise, light, vibration and/or water pollution on communities or wildlife, for example, should include the implications of the CRR.

That cumulative assessment of all development should identify the impact on nature's recovery, climate mitigation and future food security, linking to the LNRS, and complying with the NPPF and PfE policies.

The applicant mentions (PS para 9.26, PS para 9:30) that the schemes are largely able to mitigate their own impacts, but this ignores the cumulative impact caused by the schemes when combined with the allocation as a whole, including for example, insufficient consideration of the cumulative impact of surface water flooding on all sites across the New Carrington development.

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 is not fully understood, especially given the implications for the numerous natural capital assets in the area.

Precedent for additional development between Partington and Warburton

We are very conscious that the original plans for New Carrington were for 16,000 homes and 7m m² employment space. We are, therefore, very concerned that the approval of development on these sites will result in demand for further development between Partington and Warburton, which was not anticipated within the Places for Everyone Plan. This is now of particular concern given the Planning Inspectorate has approved a development on retained Green Belt, which participation in PfE was meant to prevent.

We believe the points we have raised above should result in a determination that the planning application is premature and should not be approved.

Kind regards

Marj Powner

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/>)