



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

## Complaint re Planning Application 115160

1 message

Friends Of Carrington Moss &lt;friendsofcarringtonmoss@gmail.com&gt;

17 June 2025 at 11:22

To: "Fisher, Adrian" &lt;adrian.fisher@trafford.gov.uk&gt;

Bcc: Marj Powner &lt;marj.powner@gmail.com&gt;, Friends of Carrington Moss &lt;friendsofcarringtonmoss@gmail.com&gt;

Dear Adrian

We have received extensive feedback from our supporters and would like to make a formal complaint about the approval of planning application 115160 and the response we have received to our Freedom of Information Act request (16028).

Our complaint is summarised as follows:

- Lack of compliance with the local authority best value duty
- Lack of compliance with the local authority biodiversity duty
- Lack of compliance with Trafford's declaration of a climate emergency
- Lack of compliance with Trafford's Carbon Neutral Action Plan
- Lack of compliance with the local authority duty of care for residents
- Lack of compliance with Article 6 of the Human Rights Act

This planning application was approved despite not complying with the Places for Everyone Plan policies. This suggests that the many millions of pounds of public money spent developing, agreeing and approving this plan have been totally wasted. Please can you confirm how Trafford's proportion of this expenditure is audited for effectiveness and best value.

We do not believe there was any need to prematurely approve this planning application in advance of the New Carrington Masterplan being fully developed. That the Officer's Report states "*there is no fundamental conflict with the emerging masterplan, that would preclude this development from coming forward ahead of it*" is indicative of the lack of balance given to the biodiversity and environmental implications of this scheme. Whilst "*the proposed development does not fundamentally conflict with the work which has been undertaken to date*", Trafford has provided no evidence that they have undertaken **ANY** work on the Green and Natural Infrastructure Strategy, so this has not been taken into account at all. That strategy will, among other things, determine the land needed to compensate for the release of Green Belt, the harms to the remaining Green Belt, the damage to, or destruction of, the 335 hectare deep peat moss, the significant loss of trees, hedges, woodlands and wetlands and the impact to 15 sites of biological importance and a site of special scientific interest. It should also set out the ecological and biodiversity implications of the delivery of the New Carrington allocation.

The Places for Everyone plan describes the mosslands as supporting "*a unique range of wildlife*" and highlights that "*lowland raised bog is now one of Western Europe's rarest and most threatened habitats*". With this in mind, the conclusion that "*the relatively small scale of the site in the context of the wider New Carrington allocation, the offer of compensation and the fact that it will be returned to its current state in future years, are unique to the application proposals*" is bizarre. A site of 20 hectares is not small scale, even when considered against the whole of the New Carrington allocation. The most important environmental attribute of this site is the very deep peat, an irreplaceable habitat. It will not be returned to its current state in future years. The development will either damage, or completely destroy, the wider 335 hectare peat moss. In fact, the potential for any aspect of such sites to return land to its previous condition is not proven.

Trafford appears to be totally disregarding the biodiversity and environmental implications of this application. The compensation of 1.15 hectares offered by the applicant for the destruction of 19.9 hectares of very deep peat, overlain by productive best and most versatile agricultural land, that provides the nesting habitat for red listed farmland birds, and a foraging corridor for the adjacent SBI, is pitiful. The Officer's report is misleading. No sites are needed '*immediately to contribute to the site-wide green and natural infrastructure strategy*', because that strategy has not yet been produced. The statement that "*the location of the proposed development has not previously been identified as part of the mitigation area for the loss of a woodland SBI (109755/OUT/22)*" is incorrect.

Please explain how the premature approval of this planning application supports your responsibilities in relation to the best value and biodiversity duties.

That the Officer's Report concludes that the importance of the Masterplan can be ignored because "*it is considered that the application proposals are unique*" is inexplicable given that Trafford has already approved several of these schemes, including two others in the Carrington area (one at Carrington Power Station and another at Wildfowl Farm).

Furthermore, despite declaring a climate emergency in 2018, and releasing a Carbon Neutral Action Plan in 2020, Trafford does not have the information needed to determine the impact of this planning application on its net zero aims, nor on the wider impact to the Greater Manchester target 2038.

That Carbon Neutral Action Plan states that "*every individual and organisation present within the borough has a role to play if we are to successfully reduce emissions and achieve carbon neutrality*". Such actions start with Trafford themselves, including the planning team. The Action Plan also confirms that "*Trafford faces a greater challenge than most Greater Manchester authorities due to the carbon emissions associated with Trafford Park Industrial Estate and The Trafford Centre, along with those from major sporting and tourist attractions such as MUFC, Lancashire Cricket Club, Trafford Quays and Dunham Massey, particularly in terms of travel choices and their associated carbon emissions*".

Yet, the FOI request response (16028) states that Trafford does not know how the approval of this planning application will impact Trafford's net zero carbon aims.

The applicant's Peat Survey acknowledges that the "*majority of the survey area comprises deep peat*", with peat depths ranging from 100cm to 300cm. The Officer's Report confirms this stating that "*the whole survey area consists of peat soils, with the majority being classified as deep peat*".

Given that there is a recognition that either piling or removing the peat will result in a huge carbon emissions event, it is reprehensible for Trafford to have approved this planning application without securing the information about the carbon emissions implications.

The applicant has offered two options for extracting the peat, the first resulting in a combined estimated peat excavation of c192,000 m<sup>3</sup>, the second in a combined estimated peat excavation of c90,000 m<sup>3</sup>. Given Trafford's emissions totalled **1,088,301 tonnes in 2022**. Even the lower estimates for this "*relatively small scale*" site will result in additional carbon emissions of over 2.3% (at an extremely conservative estimate) for the peat excavation alone. This is totally contrary to the NPPF, which states (paragraph 161) that places should be shaped "*in ways that contribute to radical reductions in greenhouse gas emissions*". The cumulative emissions from construction and peat extraction will negate any benefits of this scheme.

In response to our FOI request, asking how the carbon emissions event will impact Trafford's net zero carbon aims, Trafford responded that "*the development was considered to comply with the development plan when taken as a whole*". Yet, the Sustainability, Climate Change and Energy Efficiency section of the Officer's Report only covered the supposed positive aspects of the scheme and did not even mention the carbon implications of developing on deep peat. Without understanding these implications, how did the officer conclude that this scheme will "*align with the ambitions of the Council to become a carbon neutral borough and the ambitions of Places for Everyone to decarbonise the region*" and that it would "*provide a valuable contribution to cutting greenhouse gas emissions*"?

Please explain how the carbon emissions implications were taken into consideration in determining that substantial weight should be afforded to "*the proposal's significant benefit with respect to the contribution the BESS would make to mitigate climate change*", especially when considering the wider ecosystem benefits of peat!

Local authorities also have a duty to ensure the safety of people in areas they are responsible for. Please explain how that duty has been discharged when this planning application increases the risks of harm not only for residents but also for those using the moss on a day to day basis.

We are aware that Basell Polyolefins submitted a holding objection highlighting that it is "*essential that the local planning authority considers the risk of the proposed development in the context of the existing Basell petrochemical site and its operations*". They confirmed that there are potential public dangers given the proximity of this site to the Basel operations.

We do not believe Trafford has taken reasonable steps to prevent or minimise the potential harms to the public and we consider it negligent that Trafford has prematurely approved this planning application before the safety of citizens can be assured. As highlighted in our representations, and in recent discussions in Parliament, these schemes are known to present a fire risk. Realisation of such a risk will also lead to toxic fumes and water/soil contamination. In this location, there is also a risk of a much larger incident as a consequence of any explosion causing a ricochet effect with other hazardous businesses in Carrington. In addition, whilst the security on other sites in the vicinity is paramount, it is possible that extremists could consider the BESS to be a beneficial weak point to support a strike at the

heart of a residential and employment area, in which Trafford plans to substantially increase the footfall of both occupants and employees.

Furthermore, despite the repeated concerns we have raised in relation to this scheme, on behalf of our followers, including the health and safety concerns mentioned above, this premature planning application was approved at obscene speed, without going to the planning committee. Please explain why it was not considered appropriate to provide communities with the opportunity to raise our concerns with elected members in such a meeting, thus not complying with our right to be heard in a public forum (Article 6 HRA).

We look forward to your response.

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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/>)