

## Funding Mechanism and Delivery Strategy

### Do you agree with the Phasing and Delivery Programme set out in the NCM Phase 1: Funding Mechanism and Delivery Strategy?

No, we do not agree with the Phasing and Delivery Programme set out in the NCM Phase 1: Funding Mechanism and Delivery Strategy for the reasons set out in the paragraphs below.

### Do you agree with the Proportionate Infrastructure Contributions Schedule for Residential development?

No, we do not agree with the Proportionate Infrastructure Contributions Schedule for residential development for the reasons set out in the paragraphs below.

### Do you agree with the Proportionate Infrastructure Contributions Schedule for Employment development?

No, we do not agree with the Proportionate Infrastructure Contributions Schedule for employment development for the reasons set out in the paragraphs below.

### Do you agree with the Council's Explanation and Implementation Statement?

No, we do not agree with the Council's Explanation and Implementation Statement for the reasons set out in the paragraphs below.

## Community Engagement

Whilst an improvement on previous community involvement, consultation and engagement with community stakeholders in relation to this strategy has been extremely limited. Despite our requests for more discussions, there have been no community events since July 2024.

It seems (strategy document, 1d) that some stakeholders have benefited from more engagement with the project than communities. Given our knowledge of the allocation area, we believe that our inputs should have been sought on the Proportionate Infrastructure Contributions, along with those of developers. The initiative should have used a more 'agile' and iterative approach, which would have resulted in fewer concerns at this late stage.

In addition, our feedback does not appear to have been given the same 'weight' or conscientious consideration as that of other interested parties. The Options Report actually separates communities from 'stakeholders' (in the Options Assessment).

Whilst we accept that consultation will not result in all suggestions from a particular stakeholder being accepted and implemented, responses should not be misrepresented. As just one example, community participants explicitly fed back that we do not agree with motor vehicle access to Firsway from the Sale West Link Road (both in the face to face session and in the joint community written feedback). Yet, the Option Report, paragraph 2.8.6, states that "*No strong views expressed regarding Sale West Link route options during stakeholder events to date, other than general need to minimise ecological impact*". It seems that feedback from the community groups has been dismissed and is not included in the subsequent formal reports.

Expanding on this issue, we do not agree with the statement in the Options Report that the Sale West Link Road access is needed to both north and south "*so that traffic to and from Sale West does not have to make longer journeys on the wider road network*". We understand there is an aspiration to encourage walking, wheeling or cycling for shorter distances.

# Friends of Carrington Moss Response



For traffic that is commuting longer distances, the requirement to exit the estate to the north will result in a negligible increase in journey time.

Conversely, facilitating vehicle access onto Firsway (figure 2.2) will result in the road becoming a rat run, will require the felling of hundreds of trees and will impact the dark skies in this area. It will also increase traffic and safety concerns on Firsway and, consequentially, the costs to the emergency services of dealing with any resulting accidents/incidents and to the NHS for pollution-related health conditions.

Limiting the access to Firsway to active travel users would not only reduce the costs of constructing the Sale West Link Road, it would also reduce the cost of mitigating or compensating for environmental/ecological harms. Given that contributions from developers are constrained by viability considerations, this alternative option should have been explored further to reduce the impact on public funds.

Our feedback that the Eastern Link Road and the Southern Link Road should not be connected has also been discounted. Again, this will create a rat run, which will induce huge levels of traffic from the M60. It will also cause significant environmental and ecological harms, including damage to, or destruction of, very deep peat, it will increase pollution and will impact the dark skies in this area.

Again, the current proposals result in the need for higher contributions from the public purse, whilst our alternative option reduces the cost of constructing the roads, the cost of mitigation/compensation for environmental/ ecological harms and will also reduce the consequential costs to the healthcare sector and the emergency services through fewer impacts from pollution and traffic accidents/incidents.

We do not believe measures to discourage 'rat-running' (mentioned in the Options Report) will be sufficient to dissuade motorists from exploiting alternative routes to the very congested motorways, especially given that traffic on those national highways will significantly increase due to the amount of development proposed in Greater Manchester.

## Cumulative Impact on Natural Infrastructure

Community feedback should also not be omitted. We would like confirmation of which 'key' stakeholders were involved in developing the assessment criteria (strategy document, table 8)? The joint community response to the Infrastructure Presentation proposed three additional criteria, including the impact on the natural environment. Not only are none of those criteria mentioned in the documentation, we have received no feedback about why our suggestions have been summarily rejected.

We have also repeatedly raised our extreme concerns that the Natural Infrastructure Strategy has been subordinated to a future phase of the masterplan process, which is confirmed in the strategy document, figure 3. Natural infrastructure is not listed as a key theme (strategy document, 2b, 3a) and associated costs are excluded from the calculations.

We disagree with paragraph 1.129 of the Council's Explanation, which states that it is a clear and reasonable approach to bring forward the so called 'hard' infrastructure "*whilst ensuring that investment in green infrastructure and the natural environment is accounted for*". Not only is there nothing in the documentation that provides any information about how "*green infrastructure and the natural environment is accounted for*", this approach is not compliant with the strategy's assessment criterion to "*Support delivery that is aligned to the NCM policy position as outlined in PfE*", nor is it compliant with PfE policies or reasoned justification.

PfE paragraph 11.375, for example, states that "*All development will be expected to make a proportionate contribution to necessary infrastructure, including transport, social and green infrastructure*".

# Friends of Carrington Moss Response



The PfE JPA30 policy requires, for example, that development is **required to** take into consideration opportunities to restore habitats, strengthen ecological networks, having regard to the presence of peat (criterion 1), that compensatory improvements to the environmental quality and accessibility of remaining Green Belt is provided (criterion 19) and that the masterplan must comply with the green infrastructure, natural environment and landscape policies (criteria 20 – 32).

When taking the PfE plan through the modifications process, the planning inspectors were very deliberate in their choice of wording, adapting policy criteria as they felt necessary. Where policy criteria are to be subject to 'get out clauses' such as 'where possible' or 'where appropriate' or even where 'it is not practicable or financially viable' they included these terms within the criteria. In fact, several of the JPA30 policy criteria are subject to these limitations, such as the 'where appropriate' (criteria 12 and 16), the 'as necessary' (criterion 24) and the 'appropriate' (criteria 35 and 36) terms in various policies.

Criterion 1 has no such restrictions, yet despite the documentation being explicit about other PfE criteria, such as, for example, the requirement for a minimum of 15% affordable housing provision, the natural infrastructure requirements of criterion 1 are not included in the calculations. The calculations are, therefore, incomplete.

It was confirmed to the PfE Planning Inspectors<sup>1</sup> that "*Natural England considers that the combination of the location and the extent of development proposed for this allocation mean the proposed development could not be accommodated without at least causing the deterioration of this deep peat irreplaceable habitat at the site, if not its loss*". The cumulative impact on the irreplaceable habitat (and other natural capital assets) should have been included in the calculations to ensure there is transparency about the total funding needed, particularly from the public purse.

The current road proposals do not comply with the PfE JPA30 criterion 24 requirement to minimise any loss or deterioration of irreplaceable habitat. Given that our concerns about linking up the roads across the moss have been ignored, the harm to be caused will be extensive and will require a significant area of compensation. The government's guidance<sup>2</sup> requires such compensation to be relative to the baseline habitat type. We are aware that the peat depths are significant and, as peat can only be generated on peat and is produced at a rate of 1mm per year, observation of this guidance is essential.

Furthermore, as part of the compensation for the release of 2,400 hectares of Green Belt, the GMCA commissioned LUC (May 2019) to undertake an assessment identifying the potential opportunities to enhance the beneficial use of remaining Green Belt, in accordance with what is now NPPF paragraph 151<sup>3</sup>. The cost of implementing the opportunities set out in document 07.01.20<sup>4</sup> should also have been included in the calculations.

The anticipated extensive damage to natural capital assets is highlighted by the statement at paragraph 1.94 of the Council's Explanation, which confirms that "*The geographic distribution of this infrastructure covers the length and breadth of the allocation*".

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<sup>1</sup> <https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Places-for-everyone-NE-letter-to-Inspector-30.6.23.pdf>

<sup>2</sup> <https://www.gov.uk/guidance/irreplaceable-habitats>

<sup>3</sup> [https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF_December_2024.pdf)

<sup>4</sup> <https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/07%20Greener%20Places/07.01.20%20Stage%202%20GM%20Green%20Belt%20Study%20-%20Beneficial%20Use%20-%20Appendix%201%20-%20Trafford.pdf>

# Friends of Carrington Moss Response



Whilst paragraph 1.75 (of the Council's Explanation) mentions a 'contribution pot' for "*Green and Blue - parks, open space, woodlands, playing fields, watercourses, ponds and drainage etc*", paragraph 1.78 appears to limit this to "*Large and/or connecting green and blue infrastructure e.g. large-scale SuDS*". This constraint, along with the explicit exclusion of Environmental Enhancements/Mitigation (table 1.2, Cost Report Appendix), suggests that the New Carrington allocation will be 'unlocked' without taking key aspects of a Natural Infrastructure Strategy into account.

There is also no indication of the location of the required mitigation and compensation. We believe this should be onsite, within the allocation area, otherwise local communities will suffer the harms to be caused by development but will not benefit from any consequential environmental or ecological enhancements.

Another example, among many omissions, is that, whilst bridges for transport are covered within the Options Report, bridges for wildlife are not. The intrinsically dark skies of this landscape also appears to have been ignored. The cumulative impact of the proposals will cause significant light pollution in the retained Green Belt and in the few remaining natural habitats. The proposals in this documentation should reflect aspirations to minimise harm. This is not currently the case, and the current proposals do not result in a sustainable solution.

Street lighting within equestrian 'rides' and existing footpath / restricted byway improvements are shown as excluded in the Transport Infrastructure Cost Report. All routes should be lit with low, wildlife friendly lighting to minimise light pollution, in accordance with NPPF paragraph 198 (c). This criteria states that planning policies and decisions should ensure that new development is appropriate for its location and should "*limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation*".

In addition to the unnecessarily inflated costs of the road proposals, mentioned above, figure 3.3 shows a typical cross section for an active travel route, with provision of street lighting. This will cause environmental harm to the dark skies on and around Carrington Moss that will have to be compensated for. Our proposal for low, wildlife friendly lighting will be more affordable and less environmentally damaging.

Tree removal should also be kept to a minimum, to curtail the costs of mitigation. PfE policy JP-G7 requires that, where development would result in the loss of existing trees, replacement on the basis of two new trees for each tree lost must be provided. Given that the current proposals will result in hundreds of trees being felled, including to support the road schemes, this policy requirement should be explicitly included in the costs and the land to support tree replacement should be identified (tree planting is inappropriate on peat).

The documentation should be updated to incorporate the costs of mitigation and/or compensation proposals relating to the Green Belt loss and for the cumulative harms to be caused to the area's natural capital assets, including damage to, or destruction of, the peatmoor. These costs should be fully reflected in the calculations to ensure that there is transparency about the comprehensive costs of implementing this allocation, and, in particular, how much public investment will be needed.

Given the number of exclusions in the calculations, figure 19 of the strategy document is very misleading. It currently shows that the contributions are more or less balanced between developers and other investors. This is not the case. Developer contributions are constrained by viability 'rules' so will not change if/when all the omitted costs are included in the calculations.

# Friends of Carrington Moss Response



## Excluded and unfunded costs

Trafford has decided that development will take place on an environmentally and ecologically rich site. Given the constraints of developer viability requirements, it is essential that the source(s) of funding for all items that are explicitly (or covertly) excluded from the calculations are unambiguously set out in an updated version of this documentation, including, as mentioned above, those relating to natural capital mitigation/compensation costs.

As an example of missing costs, there appears to be no record in the CRR Cost Estimate related to public consultation, which will need to be sufficient to meet the requirements of the Gunning Principles<sup>5</sup> and the government's Civil Society Covenant<sup>6</sup>. We are also unable to find any reference to costs for the provision of Pegasus crossings (despite the CRR team confirming that these are planned), wildlife bridges or addressing any contamination.

Among other items, we note that noise reduction and air quality mitigation measures are explicitly excluded from the calculations. Given that the area is currently very peaceful, with excellent air quality, such requirements are essential and should be included.

The Energy and Utilities calculations should include the costs of the mitigation of, or compensation for, harm to natural capital assets, including peatland disturbance or destruction.

Paragraph 1.92 of the Council's Explanation suggests that employment development is unlikely to place additional burdens on social infrastructure, including health facilities and services. This is incorrect and we disagree that no costs are assigned to employment provision for this category. We also believe social infrastructure for healthcare should extend beyond primary care to secondary healthcare, mental health provision and all emergency services, as the costs for all these services will increase as a consequence of the proposed developments.

Employment development will generate higher levels of air, noise, light, vibration, dust and water pollution that will impact the health and wellbeing of residents. Those schemes that result in high numbers of HGVs on local roads, due to the lack of sustainable freight transport being proposed in this allocation, will particularly cause significantly increased pollution. This does not appear to have been considered in the calculations. A collision with an HGV is likely to result in much more serious injuries, which could require long-term NHS treatment, increasing the burden on local hospitals and other emergency services. Trafford is also aware of the community concerns about the Battery Energy Storage Systems (BESS), of which there are now 3 in the Carrington area. Should one of more of these BESS have a fire related incident, it will cause toxic fumes as well as other risks. This would, again, place additional burdens on the emergency services and ongoing NHS care.

The speed limit being proposed for the eastern part of the Carrington Relief Road is likely to lead to an increase in accidents and incidents, particularly given the high numbers of HGVs (including those carrying hazardous materials) and the presence of wildlife. The recent information provided by Amey<sup>7</sup> shows that the current road is much safer than the average road of the same type. Furthermore, a study by a local school confirmed that only 5% of employees in Carrington lived in the local area (and, as such, may possibly be persuaded to commute via active travel options).

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<sup>5</sup> <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

<sup>6</sup> <https://www.gov.uk/government/publications/civil-society-covenant/civil-society-covenant>

<sup>7</sup> <https://www.youtube.com/watch?v=L3uG5SzmzjA>



# Friends of Carrington Moss Response



There is no requirement for employers to provide access to the site by sustainable transport options, which will lead to increased pollution, as mentioned above, again contributing to increased health and safety implications. Due to the isolated nature of the location, the lack of actual commitment to new bus services, and the lack of any tram/train services to the location, it is likely that the vast majority of employees will travel by car.

The removal of the eastern part of the Carrington Relief Road scheme would result in the road being more affordable for both developers and the public purse, even with the cost of improvements to the existing active travel routes and existing roads. It would also result in less environmental and ecological harm (reducing the need for mitigation/compensation) and would significantly reduce the pollution to be experienced by local communities.

Given the size and scale of the allocation, the number of years of construction activities, and the associated impact on existing residents (of both construction and operation), these proposals are likely to result in increased costs to mental healthcare services for Trafford.

Farm/ private property access crossings are also excluded. How will these be funded?

Off-site highway improvement estimates should not be limited to motor vehicle benefits. As an example, whilst there is a cost for improvements to the WH5 - Heatley/ Paddock Lane/ Bent Lane junction, no costs have been included to improve the active travel options through Warburton. This is a key requirement, without which active travel users will be faced with an extremely hazardous route. We recognise that this is not within the allocation boundary, but it should be included in Table 2.4.

Do the requirements set out at paragraph 1.124 of the Council's Explanation apply to the Council and other public sector funding partners as well as developers? Point d) for example, states that "*Fees, surcharges and/or interest to be charged for avoidable late payment and/or unnecessarily delayed provision of infrastructure*". How would this criteria be applied to Trafford if there is late delivery of, for example, the Carrington Relief Road? Will the reports mentioned at point g be made available to the public? What sort of "*exceptional circumstances*" (point i) might lead to affordable housing not being delivered onsite?

If there is subsequently a shortfall in the availability of funds for infrastructure, how will priorities for spend be agreed? No environmental or ecological harms should be allowed to be caused until it is confirmed that funding for the mitigation and compensation for the loss of Green Belt and those extensive cumulative harms will become available.

## Viability

We note that proposals associated with land that already has planning permission are not expected to contribute to the cumulative infrastructure impact of developments. Whilst the appraisals appear to suggest potential future applications are viable, does this approach mean that a higher contribution is required from those whose planning applications are still to come forward, when compared with any contributions that have been, or will be, made by developers with planning applications that have already been approved?

What is the mediation process if a developer does not agree with their contributions?

How will the outcome of the planning inspectors' decisions in relation to developer contributions be incorporated into the strategy? Whilst we acknowledge Trafford is challenging the first decision (Peel), it could be many months before a judicial determination is reached, and we understand a second appeal (Blackrock) will be heard in late October.

The strategy document, section 3a states that "*Warburton is expected to achieve higher sales values for residential compared to Carrington which is adjacent to industrial uses. This is reflected with a premium of c.20% applied to Warburton*". Appendix D (Market Evidence and Worked Scenario Assumptions), page 101, suggests that Lymm, Timperley and Broadheath have been used as comparator sites. Why was Dunham not included?

# Friends of Carrington Moss Response



Section 3a acknowledges that “*limited new build evidence exists for certain parts of the allocation, however evidence has been considered from comparable locations with adjustments made for condition, location, etc. to determine an appropriate and robust sale and/or rental value*”. Do these adjustments include reference to, for example, the lack of sustainable passenger and freight transport options and the 335 hectares of very deep peat at New Carrington (which may not be the case for alternatives – Timperley, for example, has access to the tram)?

## Horse Riding

Despite our previous feedback, we do not believe the needs of the over 1,000 horses stabled on and around Carrington Moss have been adequately addressed. There appears to be no recognition of the widespread use of the active travel routes by horse riders. Options Report, paragraph 2.2.4, for example, states that “*Each Strategic Active Travel Link would be a minimum of 3m wide, lit, and would have asphalt surfacing*”, only AT5 will be surfaced to bridleway standard. All active travel routes (including strategic routes) **must** be suitable for all users, including horse riders. It should also be noted that many of the existing active travel routes are used for commuting as well as leisure, so **all** should be funded for low, wildlife friendly lighting, with appropriate surfacing. The advice about route surfacing, provided by the British Horse Society<sup>8</sup>, should be taken into consideration in the costings for all the active travel routes.

The documentation suggests there are no Pegasus crossings proposed within the allocation area. Figures 1.1, 3.1 and 3.2 of the Cost Report Appendix, for example, do not show any Pegasus crossings. These are essential given that well-used routes will be fractured by development. Riding communities must not be excluded from future routes.

In addition, it has been determined that funding is not required for Equestrian Ride E. We would welcome your confirmation of which horse riding/community representatives this has been discussed with as there is no lighting on this route and the Birch Road to Sinderland Lane part of the route has a surface that is unsafe for shod horses (it is very slippery). Traffic calming is also needed to deal with vehicles that do not comply with the speed limits along the route. It should be noted that the Transport Infrastructure Cost Report (paragraph 3.1) suggests that Equestrian Ride E is not part of the allocation, which is incorrect.

We also note that horse riders are omitted from the cross section diagrams and would like to understand how they are expected to integrate with other users.

Despite the document suggesting that recreational routes need no lighting at all, Option Report, paragraph 2.2.5 (proposed development plot active travel principles) posits that “*a safe environment for all users*” includes such routes being well-lit. As mentioned above, the lighting requirements should be appropriate to the surroundings. Furthermore, given that the development plots will fracture existing horse riding routes, the principles for “*Safe and suitable access to and within the site can be achieved for all users*” should be amended to explicitly state that surfacing must be suitable for horse riders.

## Risk Register

In relation to the risk register:

- Contamination expectations seem to be limited to PFAS / PFOS, yet the Heath Farm development found that parts of the site were highly contaminated, with many hazardous materials being listed. The application reports confirmed that there was ‘asbestos at shallow depths’ and noxious substances, including cyanide, on the site.

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<sup>8</sup> <https://www.bhs.org.uk/media/jnfl5knw/surfaces-0625.pdf>

# Friends of Carrington Moss Response



- The discovery of peat appears to be expected only at the southern part of the site. The council is aware that extensive very deep peat (between 100cm and 300cm in depth) was found at the site of the proposed BESS (planning application 115160) and Natural England believe that restorable deep peat (irreplaceable habitat) at Carrington Moss extends to around 335 hectares<sup>9</sup>.
- We note that there is no reference to political changes which may result in changes to the priorities for public funding.
- We disagree with the description of FOCM as “Environmental protestors”. We are a community group, seeking the best outcome for all local communities as well as the natural capital assets that are located at New Carrington. Our campaign is the consequence of the lack of early engagement with communities, who should have been explicitly consulted **BEFORE** the submission of this site for development.

## Further explanation needed

The strategy document highlights that “*the CIL boundaries do not align with the Zones identified in this report*”. We believe the report should provide more clarity about the implications of this lack of alignment. The expectation that different zones will provide differing levels of on-site affordable housing also needs more explanation and we are unsure about how density is reflected in the calculations.

Table 10 of the strategy document sets out the parameters for the employment contributions. The height limit for large storage/logistics (B8) is recorded as 15m, but Trafford is aware that a planning application has already been submitted (109755) for a warehouse that is 22m high (and was originally 30m high). In addition, the employment use classes highlighted in paragraph 1.71 of the Council’s Explanation appear to only include B2, B8 and open storage. If a planning application is submitted for a different use class or with other exceptional circumstances, how will the appropriate contributions be calculated?

The charges relating to primary healthcare services also need further explanation. The graphic in the strategy document suggests the location of such services will be Partington. How/where will the primary healthcare service needs of the 1,500 new homes at Sale West be accommodated and are these costs included in the calculations? Does the accommodation for primary care providers include dentistry, pharmacy and opticians within the build costs (Cost of Infrastructure Technical Note, paragraph 3.12)?

The strategy document, table 16 suggests that “*The Carrington Relief Road will not by itself unlock development plots, however it is essential to supporting improved, new and more frequent bus service provision to, from and within the whole allocation*”. Yet, in response to an FOI request<sup>10</sup>, TfGM confirm that they do not know why there are delays to services, so how can it be determined that the CRR will support improved bus provision?

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<sup>9</sup> <https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Places-for-everyone-NE-letter-to-Inspector-30.6.23.pdf>

<sup>10</sup> [https://www.whatdotheyknow.com/request/255\\_bus\\_punctuality\\_data/response/3140026/attach/2/Response%20not%20held.pdf?cookie\\_passthrough=1](https://www.whatdotheyknow.com/request/255_bus_punctuality_data/response/3140026/attach/2/Response%20not%20held.pdf?cookie_passthrough=1)



## Any other comments?

### Sustainable Development

The NPPF defines sustainable development “*as meeting the needs of the present without compromising the ability of future generations to meet their own needs*”. It seems ‘sustainable development’ has a much narrower definition in this suite of documents.

As an example, we are extremely concerned by the inference in the strategy document (1b) and the Council’s Explanation (paragraph 1.88) that the provision of ‘hard’ infrastructure alone will make this allocation sustainable. The statement that “*without the infrastructure investment the location will remain unsustainable*” is highly misleading.

The site will not be sustainable even with the infrastructure investment set out in these documents because development here is predicated on significant harm to, or the complete loss of, a 335 hectare irreplaceable habitat, productive Grade 2 agricultural land, woodland and wetland habitats, with impacts to 15 sites of biological importance and a site of special scientific interest. Natural capital assets that are of particular importance to future generations.

The allocation will not “*create a new sustainable community*”. As an example, the recent approval of the BESS planning application (115160) provides zero permanent local jobs. Other roles in the employment area are limited to B2 and B8 businesses, which may not be attractive to many of those who purchase a home in the area.

In relation to bus services, paragraph 2.3.1 of the Options Report states that the “*midpoint Scenario 2 is considered to be both realistic and achievable*”. It then goes on to confirm that this scenario falls short of achieving full sustainability. We disagree with the statement at paragraph 1.54 of the Council’s Explanation that the Carrington Relief Road (CRR) is “*essential to supporting improved, new and more frequent bus service provision to, from and within the whole allocation*”. Such services could (and should) be provided whether, or not, the CRR is delivered.

We remain very concerned that the public and active travel proposals will not materialise as these are not commitments in the TfGM Transport Strategy (unlike the Carrington Relief Road), and there are no sustainable freight transport options on the table, despite the huge number of HGVs that will be travelling on local roads.

Natural capital assets must not be sacrificed to unnecessarily (given the amount of brownfield land) create car/HGV-dependent sprawl. Should there be challenges with the overall amount of funding available, how will the funding be prioritised?

### Other Questions

Can Trafford confirm that the monitoring mentioned at paragraph 1.125 of the Council’s Explanation will be available to the public?

Given the huge differences between the contributions to be applied in the different Charging Zones, please can you provide more worked examples.

We acknowledge that paragraph 1.109 of the Council’s Explanation states that “*In kind payments in the form of land may also be required to deliver a specific piece of strategic infrastructure such as a new primary school or area of green and blue infrastructure not ordinarily delivered by developers and/or not required until a later phase*”. The document does not confirm that this includes land to support the mitigation or compensation of the cumulative harms to be caused to natural capital assets. We are extremely concerned that land to meet these requirements has not been identified.

# Friends of Carrington Moss Response



We are confused by the statement in the Council's Explanation (paragraph 1.100) which suggests that *"This long-term approach to the collection of funds avoids the otherwise inevitable situation whereby early phases of the allocation contribute in a de minimis or limited way, leaving later phases of development to face higher financial burdens – which may be unviable, causing development to stall"*.

Sites that already have planning permission and will benefit from the proposed 'hard' infrastructure investment are not expected to contribute. There may be other advantages for those sites that already have planning approval, such as those that may not have met the affordable housing requirement, for example. How does this *"long-term"* approach avoid the *"inevitable situation"* mentioned by the Council?

As mentioned above, we are particularly concerned that compensation for the damage to, or destruction of the 335 hectare irreplaceable habitat has not been considered in the funding requirements, despite the proposals to construct roads and other developments on and across some of the deepest peat in the allocation area.

Can we assume that any environmental claims, including in relation to ecology or carbon emissions, for example, made in any documentation relating to the site will fully comply with the principles in the Green Claims Code<sup>11</sup>? These principles are:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service (a new road, for example)
- claims must be substantiated.

## Conclusion

In summary, we believe the documentation needs to be updated to include all the costs, including those related to the compensation for the release of Green Belt and for the mitigation/compensation of the cumulative harms to the natural capital assets on the site, to transparently disclose the comprehensive contributions that will be required from all investors in the allocation, including the public sector.

Kind regards

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Chair

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<sup>11</sup> <https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services>



## About the Friends of Carrington Moss

Carrington Moss is a 335 hectare peat moss, irreplaceable and restorable (according to Natural England<sup>12</sup>). Despite this, the council propose development of 5,000 homes, 350,000 m<sup>2</sup> employment space and 4 major new roads on and around the mossland. The area includes productive Grade 2 agricultural land, woodland and wetlands and hosts 15 sites of biological importance and a site of special scientific significance<sup>13</sup>. There are over 1,000 horses stabled on and around Carrington Moss.

The Friends of Carrington Moss was constituted in 2018 (following the introduction of 'Trespassers will...' signage on a number of designated and undesignated public rights of way<sup>14</sup>), suggesting that the landowners considered the developments to be a fait accompli for residents.

The aims<sup>15</sup> agreed by the committee included the following:

- To consult with, and act as a voice for, local residents and users of Carrington Moss, on matters relating to, or impacting, Carrington Moss
- To increase the level of community involvement in decisions related to the future of Carrington Moss, including appropriate levels of timely and genuine community engagement on all planned developments
- To encourage, enable and promote physical activity (walking, cycling and horse-riding) across all routes in the area, and progress claims for Public Rights of Way, where appropriate.

Carrington Moss was allocated for development in the regional spatial plan (known as Places for Everyone). The plan requires development to be in accordance with a Masterplan, but Trafford has already approved development that does not comply with development plan policy.

The Friends group responds to planning applications<sup>16</sup>, inquiries and consultations<sup>17</sup> relating to the area and more broadly in relation to planning issues. We also record the conditions<sup>18</sup> (such as the extensive surface water flooding) and the red listed birds and endangered wildlife inhabitants<sup>19</sup> on the moss. The current populations of the already threatened species, such as the Willow Tit and the Skylark will be severely depleted as a consequence of the proposed developments.

The Friends group has around 3,000 followers on facebook, over 800 followers on twitter and circulates a monthly newsletter to around 600 local residents. The group holds a public meeting every month to ensure communities have the opportunity to contribute to our activities and responses. Members of the committee also represent the group at other local community events and meetings. An annual report is produced each year, available on the website<sup>20</sup>.

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<sup>12</sup> <https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Places-for-everyone-NE-letter-to-Inspector-30.6.23.pdf>

<sup>13</sup> <https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2025/09/231106-sbis-sssis.jpg>

<sup>14</sup> <https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2025/09/190601-cm-prows.jpg>

<sup>15</sup> <https://friendsofcarringtonmoss.com/about-us/>

<sup>16</sup> <https://friendsofcarringtonmoss.com/planning-applications/>

<sup>17</sup> <https://friendsofcarringtonmoss.com/consultation-responses/>

<sup>18</sup> <https://friendsofcarringtonmoss.com/carrington-lake-2/>

<sup>19</sup> <https://friendsofcarringtonmoss.com/endangered-species/>

<sup>20</sup> <https://friendsofcarringtonmoss.com/committee-reports/>