



Case for Refusal Planning Application 109755/OUT/22

18th May 2026

Dear Planning Committee Members

Case for Refusal of Planning Application 109755/OUT/22

We are very concerned that the Planning Officer is recommending that the decision on this application should be “*Minded to Grant*” and then delegated to the Head of Planning and Development, given the numerous identified and outstanding issues and what the Officer confirms is a **significant breach** of the development plan (paragraph 285).

This approach will not result in the scrutiny that such a complex and extremely harmful development requires. It is not in the public interest for Trafford to consider the developer’s threats of non-delivery to be more important than compliance with regulation, their biodiversity duty¹ or their duty of care for their citizens. Furthermore, the Officer’s suggestion (paragraph 286) that this decision is “*unlikely to set a precedent for significant breaches of the development plan elsewhere*” seems to be an underestimation of developer power and influence within the planning system, which could impact future applications beyond the New Carrington boundary.

What is described (paragraph 286) as the Council’s “*pragmatism*” is, in fact, a complete betrayal of their residents, who have every right to expect that, given the amount of public money that has been spent agreeing development plan policy and creating the New Carrington Masterplan, those policies are adhered to and delivered.

The developer’s intransigence on several issues (including their refusal to consider options to avoid the very severe impact on ecology and biodiversity, despite alternative sites being available, leading to the loss of over 10,000 trees in a woodland SBI, along with, for example, their refusal to implement a shuttle bus service given the deficiency in sustainable transport options), suggests a lack of respect for local communities, for nature and for the potential future workforce.

There is indisputable certainty about the harms to be caused by this proposal (to residents, to nature and to the environment), but the supposed benefits are all unproven, uncertain and/or unpredictable (including the economic and social benefits in terms of job numbers, and the success of the very long term outcomes of the compensatory habitats). We explain in more detail in the paragraphs below. There also appears to have been very limited consideration of the cumulative impact of this development alongside all the other schemes being progressed in New Carrington.

In addition, the Officer acknowledges (paragraph 283) that granting this permission will not be “*a silver bullet*” and that there is **no guarantee** that the proceeds from successful delivery will be reinvested in Carrington. Prematurely agreeing this application, in advance of the required New Carrington Masterplan, will therefore create uncertainty. The report also makes it clear that this application will compromise that Masterplan, and that the Masterplan will undermine the deliverability of the applicant’s mitigation/compensation proposals.

The report suggests (paragraph 307) that the value of the SBI is less in monetary terms than the potential development but there is no Natural Capital Assessment (in accordance with the Treasury’s Green Book requirements) that validates that assertion. The Office for National Statistics² confirms the “*asset value of UK woodlands was an estimated £382 billion in 2021*”, carbon sequestration equated to £150 billion and the total annual value of UK woodlands ecosystem services was an estimated £10 billion. More evidence is needed in relation to the value attributed to this woodland SBI in any calculations.

The Greater Manchester Ecology Unit (GMEU) recommends (paragraph 44) that this application **is refused** on nature conservation grounds.

¹ <https://www.gov.uk/guidance/complying-with-the-biodiversity-duty>

² <https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/woodlandnaturalcapitalaccountsuk/2024>



Several new documents have been added to the planning portal, including the Financial Viability Assessment, **AFTER** the very short notice communities have been given of the planning committee meeting date (**only one week**). This is inadequate time for residents to independently verify the information provided. The Additional Information Report has not yet been published. There has been no consultation on the recently issued documentation. This period of notice does not meet the requirements of the Gunning Principles and those who will be specifically impacted by the development have had a very limited opportunity to review the documentation and no genuine opportunity to provide feedback in advance of the planning committee meeting, nor to contact their Councillors for support.

There is no reference in the Officer's Report to compensation for residents impacted by this development (although compensation has been mentioned in the Carrington Relief Road Planning Application documents). There appears to have been no effort to reduce the proposed 24x7 operation of the site to minimise the impact on local households, nor to reduce the 22m height of the buildings.

Waving through this Outline Planning Application will cause reputational damage to the Council and the developer. The ongoing media storm caused by the approval of lower (18m high) warehouses in Astley, is relevant. There, the developer made material changes to various aspects of the application, including height, **AFTER** Outline Approval. Wigan Council's Independent Assessment concluded that residents were not adequately consulted on those changes. We note that, for the Junction scheme, the developer originally wanted these warehouses to be 30m high. What is to stop them making similar changes after Outline Approval?

Furthermore, what confidence can the Planning Committee, Ward Councillors, Parish Councillors or members of the community have in the planning application documentation? Trafford found the developer's Landscape and Visual Impact Assessment to contain numerous and significant errors, omissions and out of date best practice, resulting in misleading and unreliable conclusions (paragraph 121). We have also previously highlighted factually incorrect and conflicting information within in our objections.

Given that, as confirmed by the Officer (paragraph 310), this scheme offers just **ONE** potential method to unlock the allocation, this should not be given substantial weight and other, less harmful, options should be explored. As the environmental and ecological benefits of the scheme are so long term, unproven and uncertain, neither substantial nor moderate weight should be attached to these aspects. It is totally incorrect to suggest (paragraph 312) that the significant harm to biodiversity would be temporary. Habitats and species populations will be permanently destroyed, and it is possible that the very long term expected biodiversity benefits will **NEVER** be delivered. The total lack of sustainable passenger and freight transport options mean that the severe impact on the local road network will **NOT** be mitigated when the transport infrastructure is implemented because there has long been significant evidence that new roads induce additional traffic³.

The Planning Inspectors' Final Report (paragraph 653) considered that the New Carrington Allocation "*caters well for larger logistics users and thus there is no need to allocate more floorspace in Trafford to meet such needs*". Despite this, the Officer's Report reveals (paragraph 61) that the Masterplan has increased the employment floorspace in the Allocation by **20%**. There is, therefore, no need for Trafford to capitulate to the applicant's unreasonable demands.

For all the reasons set out above, we respectfully request that this Outline Planning Permission be **REFUSED** until all the outstanding information is available and local communities have been fully consulted on its content. At the very least, any Full planning application should come back to Planning Committee for approval. Alternatively, this application could be referred to the Secretary of State for Call In, as the issues raised within it are nationally significant.

Kind regards

Marj Powner, Chair, Friends of Carrington Moss

³ <https://tapas.network/35/hopkinsongoodwin.php>

Prematurity

The importance of the New Carrington Masterplan was emphasised by the Planning Inspectors during the Places for Everyone (PfE) plan examination. Their final report⁴ stated (paragraph 641) *“it is not appropriate for the policy to allow for certain parts of the site to come forward in advance of any masterplan”*. Yet, the New Carrington Masterplan has not been consulted upon, agreed or published. Trafford has not yet even produced the Natural Infrastructure Strategy associated with the Masterplan. Whilst the other infrastructure elements were published over a year ago, this has been subordinated and is still not available. Given this is a key requirement of PfE (JPA30 policy criterion 1), this planning application is, clearly, premature.

This scheme, particularly given the proposed destruction of a woodland site of biological importance (SBI) and the proposed mitigation/compensation on best and most versatile (BMV) agricultural land, would impact the Natural Infrastructure Strategy associated with the Masterplan. This is made clear in paragraphs 90, 123 and 254 of the Officer’s Report, which suggest that, not only will this application compromise the New Carrington Masterplan, and the natural infrastructure features to be retained within it, but the proposals in that Masterplan will undermine the deliverability of the mitigation/compensation proposals of this application.

The Officer’s Report shows in numerous paragraphs that this planning application is premature. Paragraph 192, for example, states that, in the absence of the New Carrington Masterplan, the proposed development cannot be considered in the context of specific parameters set out in policy. The document does not confirm that the development will conform to those parameters when the Masterplan is published. Rather than proposing that this scheme awaits the Masterplan, paragraph 195, timidly suggests that there will need to be a *“degree of compromise in relation to place-making principles”*.

Despite Trafford’s assessment (paragraph 111) that Natural England is likely to grant a licence in relation to the three derogation tests (mentioned at paragraph 110), this is also premature, given the extent of data missing from this application, the uncertainty of the benefits (economic, social and environmental), and the avoidable harms that will inevitably be caused to people, habitats and wildlife. Trafford’s suggestion that the unproven *“benefits are considered to be of overriding public interest relative to the impact of the proposed development on bat habitats”* is an inexplicable assessment given the acknowledged lack of data related to so many aspects of this development. There is, for example, as explained below, ZERO evidence that this development will result in the creation of a *“significant number of jobs”*. Whilst the developer considers that there is no *“satisfactory”* alternative site, the document sets out satisfactory alternatives, but Trafford is clearly intimidated by the developer’s threats that limiting their profits will result in no development coming forward. As for the third test, a **40 year** timetable to mitigation maturity will see a significant and immediate reduction in wildlife populations, whilst the delivery of future biodiversity benefits is uncertain and will undeniably be impacted by the wider New Carrington proposals.

Furthermore, Trafford has confirmed that there is expected to be an increase of at least 20% on the PfE indicative employment development figure (paragraph 61). This gives scope for Trafford to await the outstanding detailed information and the Full Planning Application for this development.

Non-Compliance with Development Plan and other Policies

The Officer’s Report highlights serious non-compliance with development plan policy, in addition to the non-compliance with JPA30, Policy Criterion 1 mentioned above, including, for example:

- a major adverse and significant effect on landscape and visual impact (paragraph 141), inappropriately subordinating this to the reserved matters stage (paragraph 199)
- no *“genuine choice of transport modes”* (paragraph 142), there continues to be very poor public transport options, and no sustainable freight transport is proposed or planned for this allocation area

⁴ <https://www.greatermanchester-ca.gov.uk/media/9282/pfe-inspectors-report-01-final.pdf>



- post development, the site remains unsustainable (paragraph 171), no public transport improvements are proposed by the developer (paragraph 169 states that “*it is considered that improvements to public transport infrastructure are necessary so that public transport is a genuine alternative to the car and an attractive option for employees*”) and Trafford is investing all of the Good Growth Fund (£89m) in an unsustainable road scheme, the applicant has also declined to provide a shuttle bus service for future employees
- the Transport Assessment does not comply with the recent decision of the High Court (paragraph 159)
- the landscape-led approach required by the Trafford Design Code has not been adopted (paragraph 198)
- PfE policy JP-G7 requiring the over 10,000 trees lost to be replaced on 2:1 basis is not followed, the developer does not even propose to replace trees on a 1:1 basis (paragraph 201), and there is no certainty that the purported 6,500 replacement trees will actually be successfully delivered
- the high standard of residential amenity required by the NPPF will be impacted by this development (paragraph 209)
- the application does not provide a commitment that the scheme will be designed to achieve the operational carbon neutrality target of PfE policy JP-S2 (paragraph 233), the loss of over 10,000 mature trees will have a significant impact on Trafford’s aims to be carbon neutral, especially when the scheme will result in so many transport related emissions
- a heat and energy network assessment has not been submitted (paragraph 238).

Paragraph 144 confirms that “*Carrington is not considered a sustainable location in transport terms due to its physical isolation and poor transport infrastructure*”. The assertion in paragraph 302 that the adverse impacts of poor transport connectivity will be addressed by the infrastructure proposals is totally unfounded. The lack of commitment to sustainable passenger and freight transport means that the sustainability of the location will not be improved. We note that when unsustainable development is approved, it is residents and the public purse⁵ that pay the price.

It is also not a sustainable location in many other aspects, including, for example:

- The number of major accident and hazard zones in the area make it a dangerous place to increase the number of residents, employees, and travellers, especially given the presence of Upper Tier (Level 1) businesses (such as LyondellBasell/Velogy). These are businesses that store, process and/or transport large quantities of very dangerous substances and for which an incident could have a significant impact on the local communities.
- The New Carrington area has Trafford’s highest volume of natural capital assets, including a 335 hectare very deep peat moss that Natural England considers to be a restorable irreplaceable habitat, Grade 2 BMV agricultural land, woodland and wetland habitats, 15 SBIs and a site of special scientific interest, all hosting numerous red listed birds and endangered wildlife species. All these assets will be severely harmed, if not completely destroyed, by development in the proposed Allocation.
- Trafford’s plans for the New Carrington Allocation centre the site around 4 major new road schemes, rather than public transport and sustainable freight hubs. Paragraph 282 appears to suggest that the regional Good Growth Fund (£89.1m) will all be spent on the delivery of the Carrington Relief Road (CRR), not on investment in increased public transport for the area. This also seems to be the case for the reduced developer contribution of £12m.

Trafford must also comply with the government's strengthened biodiversity duty, which means it must do what it can do to conserve and enhance biodiversity, as set out in the Environment Act 2021. The proposed approach to this development does not comply with that duty. Councils are also legally required to take actionable steps to improve the health of their local population, this includes reducing environmental risks.

⁵ https://communityplanningalliance.org/wp-content/uploads/2026/03/260319_CPA-Report-WHO-PAYS-FOR-UNSUSTAINABLE-DEVELOPMENT_Mar26.pdf



Trafford's repeated suggestions that this development could become compliant with policy at reserved matters stage is at best optimistic and at worst utter fantasy.

Cumulative Impact

The Officer's Report lacks analysis of the cumulative impact of this development along with others in the Allocation area.

In relation to the area's natural capital assets, the Officer's Report offers no assessment of the overall loss, including the total loss of woodland across the allocation area and the overall loss of BMV agricultural land. The proposed compensatory package for this application will cause the loss of approximately 20 hectares of BMV. The CRR planning application states that it will incur a loss of 28 hectares of productive BMV (with a further 12 hectares severely impacted by the road alignment). Two other road proposals referenced in the Officer's report will also each result in at least the same level of loss of currently productive BMV (and will invalidate the mitigation proposals in this scheme, on the same agricultural land). The Battery Energy Storage System (that Trafford has approved on very deep peat) has also removed 20 hectares of productive Grade 2 BMV agricultural land and the deliberate creation of Grey Belt will see yet more BMV land lost to development.

Yet, the Officer's Report does not highlight this impact, nor the loss of existing actual jobs in the rural economy (to be replaced by the potentially phantom jobs that may never arise even if this development is given approval).

Furthermore, some of the assessments are incorrect. Paragraph 161, for example, suggests that the transport issues are "*temporary*" until the CRR is implemented. This is not the case. The CRR planning application does not provide evidence that its construction delivers long term transport viability for the allocation area. The lack of focus on, and investment in, sustainable passenger and freight transport means that, as shown in the CRR application, there will be ongoing and increasing traffic congestion due to the CRR drawing traffic (Trafford's words) from the M60, the M6, the M56 and the A56, onto the CRR and onto the east and west-bound A6144.

Developer Viability

Wain Estates has the largest land holdings in the New Carrington Allocation area. This clearly gives them power which they are shamelessly exploiting but Trafford should also recognise that it gives them flexibility and the means of spreading their costs related to the regeneration they are proposing.

The applicant is an expert in its field and will have carried out extensive and comprehensive due diligence on the composition of the land when they purchased it. They should not now expect a benefit in the form of a reduction of **almost £8m** to their proportionate contribution. This sets a precedent for their future proposals. They will have been fully aware of, for example, the contamination and that this would have to be remediated (there was no mystery about the previous uses of the land), they knew about the COMAH zones, the lack of infrastructure, the natural capital assets, and it has been **their choice** to propose and implement residential properties in close proximity to this scheme. For these reasons, the applicant's assertion (paragraph 272) that the loss of the woodland SBI is necessary to generate funds to bring forward the development at Carrington Village is irrational.

The applicant's suggestion that the "*combination of abnormal costs and constraints*" (paragraph 77) make alternative options 'commercially unacceptable' should not, therefore, have been acceded to by Trafford (paragraph 268) as this calls into question the viability of the whole New Carrington Allocation (which was raised in representations at examination). In addition, paragraph 278 suggests that the outcome of the recent High Court challenge has strengthened the ability of the Council to secure proportionate contributions. If this is the case, the additional £8m should be secured from the developer if this scheme is agreed.



The Officer's Report has revealed (paragraph 61) that the "*latest delivery figures for development in New Carrington already indicate more than 350,000 sqm employment floorspace (419,000 sqm)*". That is a 20% increase on the PfE expectation which will benefit developers. In addition, Trafford's plan to sacrifice Green Belt land to develop more new roads (paragraph 90), will result in that land being redesignated as Grey Belt. This will enable even more development on the green spaces currently used by very vulnerable communities, again, to the benefit of developers. The Officer's concern about further Green Belt release (paragraphs 280 and 306) is, therefore, questionable. As mentioned above, this applicant was fully aware of the constraints related to this site and should not be permitted to devalue or destroy Trafford's extremely important natural capital assets in pursuit of their profits.

We note that the developer admits that the existing income from the use of the site as open storage is also a factor in their viability considerations. Further examination of the alternative options to completely felling a woodland SBI, against the advice of the GMEU and the wishes of residents should, therefore, be sought.

Alternative Options

The Officer's Report concludes (paragraph 297) that the significant harm to biodiversity could be avoided by locating part of the proposed development on an alternative site. It confirms (paragraph 52) that there is no overriding reason for the whole of the proposed development to be located on the same site to accommodate the needs of prospective occupiers.

Trafford's analysis demonstrates that alternative sites are available (paragraph 57), and PfE does not anticipate the loss of SBIs to facilitate the approval of any development. Officers are satisfied that the development needed to deliver the commitments in PfE can be provided without it being necessary to build on the SBI (paragraph 65). Yet, the applicant has unreasonably refused Trafford's request to make the scheme more sustainable by reducing it in size (paragraph 77) or by considering alternative sites.

The applicant's suggestion (paragraph 70) that the development would attract further investment and occupiers rather conflicts with their assertion that overall supply is limited (paragraph 55). Furthermore, the applicant's demand (paragraph 77) that "*only the development as proposed would enable development to come forward on this site and generate the funds that would be re-invested in other phases*" is not credible and should be further scrutinised and challenged.

Lack of Certainty about Job Numbers

We note that the Officer has afforded (paragraph 304) substantial weight to the economic and social benefits to be provided by the supposed job creation, yet there is no guarantee that over 1,000 **new** jobs will be generated by this development.

The developer's claims in this regard are unrealistic and unproven. We are aware that previous occupiers in Carrington have brought all their staff with them from their previous site (Hilti, for example) and that the same has happened in other areas. In Astley, for example (where we understand the Council and the developer suggested the mega-shed development would generate 500 new jobs), the current occupier is transferring its whole workforce from Bolton to Astley and has only identified 8 new jobs, 3 of which would be HGV drivers).

Trafford suggests that open storage will create fewer jobs than B2 or B8 units but would put less pressure on infrastructure. It is clear (paragraph 77) that open storage generates substantial income, which is good for the economy. Trafford's assertion that, in economic terms, "*maximising the amount of B2 and B8 use in the allocation is a positive*" is incorrect. It will take many, many years to recoup the costs incurred due to approving this development (not just the costs related to infrastructure, but also the impact of the consequential increases in air, noise, light, vibration, dust and water pollution, the health and wellbeing of local communities and the costs to the environment and nature's recovery).

Phantom benefits should be noted. There are 3 Battery Energy Storage facilities in the employment zones of Carrington, and they provide ZERO local jobs. There is no guarantee that residents of local deprived areas will have the skills or experience to fulfil any of the jobs created.



Harms to be caused to Residents

The applicant is proposing 22m high warehouses, operating 24x7, in an area that they themselves have sought to gentrify.

The experience of the residents living adjacent to the mega-warehousing site in Astley (which are 18m high) can be used to demonstrate with certainty what will happen to those affected by this development. Their property values will plummet. Their mental and physical health will suffer, because of, among other things, increased levels of flooding, 24x7 air, noise, light, vibration, dust and other pollutants and due to having to fight to secure adequate compensation for the harms caused by the development.

It should be noted that, although Wain Estates will be able to appeal if this application is refused, residents do not have that right if it is approved. Their only option is to request permission to take a judicial review, which is extremely costly for all parties.

With this in mind, residents should, justifiably, expect their Council, their Planning Committee, their Ward Councillors, their Parish Councillors and Officers to ensure that the harms to be caused by this development do not impact their rights, including those set out in Article 8 of the Human Rights Act, which states that everyone has the right to respect for their private and family life, and their home.

Trafford appears to be capitulating to the developer's demands, rather than supporting their residents to secure the best solution that will deliver lower levels of harm to resident amenity. Proposing additional noise mitigation in the form of a 4m high acoustic barrier rather than requiring a change to design and operation is not in the public interest. Again, the cumulative impact of all development should have been considered in relation to noise and residents who currently do not have to sleep with their windows closed, should not be forced into that situation.

The impact of vibration from HGV traffic has long been experienced and reported by Carrington Village residents, so, the assessment (paragraph 225) that vibration is not expected to have a significant impact is irrational.

Paragraph 129 highlights that the proposed screening will be inadequate for 22m high warehousing. The size, scale and dominance of the development is set out in paragraphs 194 and 195. It is clear from the experience of the Astley residents that partially screening and softening the views is inappropriate (paragraph 211). The Council appears to be suggesting, in paragraph 211, that residents will have to wait many years for the significant visual impact to be mitigated by tree canopies (that may be bare in the winter, even when mature).

The Officer's Report verifies (paragraph 301) the significant harm to the landscape character and visual amenity and considers the development would compromise the quality of place-making. Yet, Trafford does not appear to have requested lower heights on the warehousing, for example, to bring the height of the proposed buildings into keeping with the surrounding landscape. This is of grave concern because it will set a precedent for other development that may come forward in the future. The deliberate creation of Grey Belt will make that land ripe for additional unsustainable development. The outcome of successive Trafford decisions could see yet more excessively dominant buildings intruding into the landscape and causing yet more harms to more residents in new and existing communities.

There also appears to have been no effort to reduce the proposed 24x7 operation of the site to minimise the impact on local households.

Trafford's suggestion that the impact on residential amenity is insufficient to warrant a refusal of planning permission (paragraph 227) is a clear indication that the harms to residents impacted by the development have been minimised and disregarded, whilst the purported benefits of the scheme have been accepted without any evidence that delivery will be possible and a lack of detailed information in a number of essential areas.

In addition to the very short notice given to communities about this application, we understand that impacted residents feel restricted by property purchase clauses which aim to impede their explicit Human Right (Article 6) to be heard at planning hearings. The Planning Committee should discourage and oppose any such behaviour in the strongest terms.

Harms to be caused to the Environment and Ecology

The Officer's Report confirms (paragraph 297) that the development would result in the loss of over 10,000 trees, the loss of habitat and disturbance to protected and notable species, resulting in significant harm to biodiversity and that the application does not take appropriate account of the Wetland at Carrington Moss (known locally as the Shell Pool Reserve). This is contrary to local, regional and national planning policy. It also conflicts with the unambiguous expectations of the Planning Inspectorate, who asserted (paragraph 35) that "*there is no suggestion that development is intended to encroach into the SBIs*". We explicitly raised this issue in our PfE representation and, having seen the Planning Inspectors' response, did not expect SBIs in New Carrington to be impacted by the proposed developments. It is also contrary to Trafford's strengthened biodiversity duty, as required by the Environment Act 2021.

The GMEU confirms (paragraph 42) that the site has not declined in its overall nature conservation value, still merits its SBI designation and concludes that the loss of this woodland habitat would be significant. As a Grade A SBI, the site is of regional/county importance (paragraph 44) and provides habitat for protected and priority species. It is one of the most important ecological features in the local area.

The Officer's Report also confirms (paragraph 298) that the mitigation and compensation package will not adequately address the harms to be caused by the development, particularly due to the significant length of time it will take to establish mitigation measures. There will be a significant and permanent loss to biodiversity, carbon sequestration capacity and BMV agricultural land.

It cannot be considered that planting whips (paragraph 83), which will take up to 40 years (paragraph 87) to mature, is an appropriate mitigation/compensation package for the complete felling of a woodland site of biological importance and the subsequent loss of over 10,000 trees.

GMEU experts assert (paragraph 88) that biodiversity losses could and should be avoided, that there are "*inherent uncertainties*" in the mitigation and compensation proposals, particularly over the long term timescales involved in this proposal, the cumulative environmental and ecological issues to be caused by the overall New Carrington Allocation and its long awaited Masterplan. All of which lead to concerns about the success and intended outcomes of the proposal, which the GMEU confirms **cannot** be guaranteed.

There is further evidence of this uncertainty in paragraph 90, which highlights the Council's expectation that part of the land proposed for mitigation and compensation **MUST** be used for yet another unsustainable road scheme, which means that the proposed mitigation/compensation scheme is totally compromised.

Furthermore, it is not clear from paragraph 262 whether the whole of the compensation area south of the Shell Pool will be accessible to the public (there is ambiguity and potential conflict with paragraph 69). Further information is needed to clarify the intentions related to this.

Given the comments on contamination and the levels of traffic to be incurred by this and other developments, we are also very concerned about the proposal to discharge surface water runoff into a watercourse (paragraph 256).

Significant Information Not Yet Provided

As an Outline Planning Application, information that is key to determining a response is not yet available. Given the harms to be caused by this proposal, it would be inappropriate for the Planning Committee to approve the application in advance of more (and more detailed) information being made available, including, for example:

- the New Carrington Masterplan, including its Natural Infrastructure Strategy and its flood risk, foul and surface water management strategy
- as advised by Natural England (paragraph 108), "*it is not possible to provide a detailed opinion on the proposed mitigation approach for this area as the data is not available*"
- the "*conclusions of the TA [Transport Assessment] are not accepted*" (paragraph 152)
- details of the external lighting (paragraph 226) – given the current dark skies in the area and the impacts on several nocturnal species, it is essential that this is provided prior to approval



- detailed carbon emissions data that confirms the scheme will comply with PfE policy JP-S2 over the full lifecycle of the development (the high level Land Use Carbon Assessment (paragraph 236) is insufficient to determine the detailed implications of the scheme)
- a heat and energy network assessment has not been submitted (paragraph 238)
- the United Utilities representation states that the application has not included the level of detail required for a development of this nature, size and scale (paragraph 258)
- a clear understanding of how the development will impact those with protected characteristics (paragraph 264), further information must be provided prior to any decision – it is insufficient for an applicant to 'encourage' future occupiers or to leave such important issues to the whim of future legal negotiations
- the number of jobs to be generated by the scheme.

Progression of the New Carrington Site

The document confirms the site has been identified for regeneration since 1996, albeit that paragraph 277 is rather selective about what has been considered in previous plans, which did include a bridge across the Manchester Ship Canal, rail connectivity and extensive public transport improvements, none of which have been delivered by Trafford or those who are profiting from the development of this Allocation area.

Given that 30 year timespan, the size, scale and composition of the proposed developments here, and the expected volume of HGV traffic, it is outrageous that Trafford has not committed to any sustainable passenger and freight transport solutions during that period.

Public transport was identified as a priority in previous plans but has not been delivered (residents of this area have no confidence that there will be improvements during the PfE plan timescales).

Sustainable freight transport for this site is not mentioned in PfE, the Greater Manchester Transport Strategy, nor the Trafford Local Plan. The Officer's Report highlights the importance of the CRR (paragraph 190) but does not mention the importance of sustainable freight, despite this issue being repeatedly raised by residents to the Council and it being mentioned in several consultation responses.