



22nd June 2026

Dear Development Management

119198/FUL/26 Firs Way (Keepmoat) FOCM Response

Thank you for the opportunity to comment on this planning application. We continue to be disappointed that developers expect to benefit from the allocation of their sites within Places for Everyone (PfE) but do not expect to have to abide by the policies set out in that plan.

As we have highlighted with previous premature applications, the first criterion within the New Carrington allocation is that development **is required** to be “*in accordance with a masterplan that has been developed in consultation with the local community and approved by the local planning authority*”. Despite paragraph 641 of the Planning Inspectors’ Report¹ stating “*it is not appropriate for the policy to allow for certain parts of the site to come forward in advance of any masterplan*”, non-compliance with this and other PfE policies has been repeatedly ignored by Trafford, which appears to have made decisions on the basis of whether or not the developer is willing to pay the necessary infrastructure contributions.

That said, there is much to be applauded within this planning application (including the 100% ‘affordable’ housing, the proposed enhancement of retained habitats, the measures to protect ecology during construction, the restriction of construction traffic routes and delivery times and the proposed landscape character and visual amenity that will be provided on completion). In addition, the applicant took the time to consult with residents prior to submission (including holding an online meeting with Friends of Carrington Moss).

Had the overall size and scale of the New Carrington Allocation been more reasonable, this scheme would be welcomed. Sadly, these very positive aspects of the development are completely overshadowed and counteracted by numerous issues, including those set out in our feedback below.

Ecology and Biodiversity:

The Biodiversity Net Gain (BNG) calculations have categorised most of the land as ‘medium distinctiveness’, yet parts of this site should be considered wetland of high distinctiveness. As we discuss below (in the Surface Water Flooding section), much of this land is subject to extreme surface water flooding for long periods. This is evidenced in photograph 4 on page 7 of the Design and Access Statement. We believe the BNG assessment should be fully reviewed.

It should also be noted that this site is the home of breeding willow tits (the UK’s fastest-declining resident bird, with population numbers plummeting by 96% since 1970). Destruction and disturbance because of development will cause a further huge decline in species population, especially given the scale of development in the surrounding area. We are unclear about the location of off-site BNG but remain concerned that this will not support local species populations.

The Sustainability Statement (and the Ecological Assessment Report) acknowledges that Great Crested Newts (GCN) are likely to be present on and around the site. A financial contribution may support a strategic mitigation programme elsewhere, but it will not help local populations of GCN. Effectively, this would be a payment of cash to trash the habitat of these strictly protected creatures, which cannot, in all honesty, be described as a sustainable solution.

¹ <https://www.greatermanchester-ca.gov.uk/media/9282/pfe-inspectors-report-01-final.pdf>



The mitigation hierarchy has not been followed. Natural England considers the 335 hectare peat moss at Carrington to be a restorable irreplaceable habitat. Development should be avoided on irreplaceable habitats. The England Peat Map suggests that this site is underpinned by very deep peat, and policy requires development that impacts this irreplaceable habitat to have an agreed compensation plan **in advance** of planning approval. No such compensation plan has been submitted with the planning application. Peat was found in 5 of the Ground Investigation bore holes but has been dismissed as insignificant.

Furthermore, the applicant suggests that they are not aware of any evidence that this scheme would prejudice any other part of the allocation, but, given the size and scale of developments in New Carrington, further loss of land that is rich in natural capital and ecosystem services should not be considered until all the cumulative impacts on both human and wildlife populations (and on irreplaceable and priority habitats) are fully determined.

We welcome the measures to protect ecology during construction and recognise that there is an acknowledgement of protected species activity in the area. This is extensive and we remain concerned that their foraging area will become severely limited, particularly given the scale of development in the surrounding area.

We note that the Ground Investigation Report highlights the potential for contamination to impact the site, given its low-lying nature. Whilst the applicant assesses this risk as low, should the risk materialise, the impact on both species and habitats would be extremely high.

Transport and Travel:

We acknowledge the proposals for pedestrians and cyclists in the planning application, but it should be noted that there are over 1,000 horses stabled on and around Carrington Moss and provision must be made for their continued access to short, medium and long hacking routes in the area.

The Sustainability Assessment highlights that “62% of residents in the local area travel to work by vehicle”. Given the very limited bus services and the distance to the nearest tram stop, we think it is unlikely that the number of car trips will be reduced by 10% over a 3-year period. We also do not consider the current single public bus service constitutes progressive sustainable transport nor does it provide the accessibility, frequency or reliability to ensure that the site does not become yet another car-dependent development.

Surface Water Flooding:

As we mention above, this proposal is coming forward in advance of the required New Carrington Masterplan policy. This is important because, for example, the drainage strategy does not appear to acknowledge that there is expected to be a huge volume of development surrounding the site, which could impact the drainage requirements. Those developments include, for example, the proposed Sale West Link Road, which will destroy local wet woodland and will shift water storage requirements to surrounding areas.

We agree with the Sustainability Assessment that the main flood risk to the site is represented by surface water, and we acknowledge that an attenuation basin is proposed to the north of the site to capture and store water run off prior to either soaking away or being discharged into the local network.



Our concerns about the potential for local flooding remain and, to some extent, have been exacerbated by what appears to be a lack of consideration of the cumulative flood risk. We are concerned that the ROFSW (Risk of Flooding from Surface Water) maps do not show the cumulative impact of development at both New Carrington and Timperley Wedge, which will undoubtedly increase the risks of surface water flooding in this area. The legend on the surface water flooding extent graphics (pages 15 & 16 of the Flood Risk Assessment) do not resemble reality, which is that large parts of this site are regularly flooded for extended periods of time throughout the year (not once every 30, 100 or 1,000 years).

Given that the main aim of the Flood Risk Assessment is to determine whether the proposed development is likely to be affected by current or future flooding from any source, to determine whether it will increase flood risk elsewhere and to determine whether the measures proposed to deal with these effects and risks are appropriate, it is inappropriate not to consider the cumulative risk from surrounding sites, including Timperley Wedge, which will impact flood risk at New Carrington.

As mentioned in the document, national policy aims to steer new development to areas with the lowest probability of flooding. Given the amount of water currently captured and stored at Carrington Moss, alternative sites could and should have been considered. We disagree with the conclusion that “*the development does not increase flood risk on the site or elsewhere*”. When considered alongside other developments in Trafford, the cumulative impact will be high.

The Outline Habitat Management Plan fails to recognise surface water or ground water flooding as a risk, yet this is probably the risk that will become an issue prior to the materialisation of any of the other identified risks.

Viability:

The applicant is not proposing to make the full contribution expected in relation to funding the infrastructure needed to support schemes in New Carrington, citing viability concerns. It is inappropriate to seek a relaxation of contributions when the applicant has chosen to develop a site of high environmental and ecological value, that will incur costs (off-site BNG, GCN licensing) and require compensation (damage to, or destruction of, an irreplaceable habitat).

We recommend the Viability Assessment, and its conclusions, are assiduously reviewed.

Kind regards

Marj Powner (Chair)

Friends of Carrington Moss