

Trafford Local Plan

Friends of Carrington Moss Response



11. Do you agree with the draft vision? If not, please explain why (providing supporting evidence where appropriate).

We do not agree with the Vision as currently articulated. Whilst there are many positive points, please see the following comments and proposed updates:

- there should be a commitment to genuine engagement with residents (more than just asking them to comment on documents), I think this is increasingly happening and is welcome, so perhaps a new paragraph stating something like *“Trafford’s Statement of Community Involvement reflects the Authority’s aim to ensure genuine and robust engagement, from the earliest stages, for all major development plans, providing the opportunity for residents to be truly involved in the design process for planned changes to their local area, ensuring they are at the heart of all decision-making in relation to their communities”*
- the word *“measurably”* should be inserted before each mention of the word *“sustainable”*
- The first statement should include something like *“Residents in crisis do not wait more than xx days for the offer of a home for social rent”*. In addition, there should be a statement which suggests Trafford will keep the pressure on developers to deliver approved schemes, so something like *“Trafford’s planning team take appropriate action when approved development schemes are not delivered within the agreed period”* should also be added.
- We agree that *“equal access to services and facilities for all”* is a great vision, how will this be achieved for school places and green spaces given the disparities that arise today? Please add the following to this paragraph *“Air and noise pollution has not increased in any part of the Borough”*.
- The following statements should be added to the carbon neutral vision *“Trafford’s peat mosses at Carrington and Warburton will be preserved and restored to maximise carbon sequestration and support achievement of our aim to be carbon neutral by 2038”*. The following statement should be added at the beginning of this paragraph *“All policy and planning decisions fully reflect Trafford’s declaration of a climate emergency”*.
- The following sentence should be added to the economic and housing growth paragraph – *“Trafford has adopted and implemented a truly Brownfield First and Sustainable Locations First approach to selecting housing and employment sites”*. This paragraph should also include the following *“The best and most versatile agricultural land will be protected to support food security, along with the businesses associated with horse riding and livery services, as both contribute significantly to the local economy”*.
- Why is Partington Local Centre specifically mentioned in the Vision statement? There are a number of other, equally important, local centres – why just mention one?
- The paragraph starting *“The need to travel has been reduced”* should include the following statements *“Each of Trafford’s large employment areas offer a variety of jobs to local residents, covering different sectors, including digital, technology and green jobs”* and *“Trafford has prioritised car free travel”*.
- The statement that *“The Greater Manchester Spatial Framework allocations at New Carrington and Timperley Wedge are delivering thousands of new homes and employment opportunities to Trafford residents”* is inappropriate because the GMSF

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is subject to consultation and approval – this statement suggests that all objections to the GMSF allocations will be summarily ignored.

- The final statement should include the following additional wording *“No natural resources are irrevocably damaged by Trafford’s plans for development and no species populations are placed at greater risk of decline following planning approval”*.

12. Do you agree with the draft Strategic Objectives and feel that they capture the priorities for Trafford? If not, please explain why (providing supporting evidence where appropriate).

Again, we cannot agree to the wording as currently articulated, please see the following proposed updates:

SO1 Deliver the homes that Trafford needs:

Please add the following statements *“Residents in crisis will not wait more than xx days for the offer of a home for social rent”*. *“Trafford will adopt and implement a truly Brownfield First and Sustainable Locations First approach to selecting housing and employment sites”*. *“Trafford will undertake a detailed post-pandemic review of housing and employment land supply”*. *“Trafford will ensure that new development is designed in accordance with the Manual for Streets”*.

SO2 Make Trafford accessible and equal for all:

Please add the following statements *“Trafford will ensure equal access to school places and green spaces within the Borough as part of the approval process for all major development plans”*. *“Development is not permitted where it will result in existing or new communities being disadvantaged, either in terms of access to services or facilities or in relation to health inequalities”*.

SO3 Ensure Trafford’s resilience and carbon neutrality:

Please add the following statements at the beginning of this paragraph *“All policy and planning decisions will fully reflect Trafford’s declaration of a climate emergency”*. *“Trafford’s peat mosses at Carrington and Warburton will be preserved and restored to maximise carbon sequestration and support achievement of our aim to be carbon neutral by 2038”*.

Add the words *“including from surface water flooding”* after the words *“impacts of flood risk”*.

Please add the following statements at the end of the paragraph *“Trafford will review all development policies and plans, whether for roads, housing and/or employment space, to ensure they meet the requirements of Trafford’s declaration of a climate emergency and their aim to be carbon neutral by 2038”* and *“Trafford will support existing and new local businesses and services to become carbon neutral by investing in green energy sources and encouraging the creation of green energy companies based in Trafford”*.

SO4 Secure successful, sustainable and healthy communities:

Please add *“Trafford will ensure approved development plans will not increase air and noise pollution in any part of the Borough”*.

SO5: Maintain Trafford’s economic potential:

Please add *“Trafford will protect the best and most versatile agricultural land to support food security, local jobs and the local economy, along with the businesses associated with horse riding and livery services”*.

Please amend the final sentence as follows *“Ensure Trafford is digitally connected, embraces new technological developments and is able to take advantage of the green jobs being created to support addressing the climate emergency”*.

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SO6 Revitalise Trafford's Town Centres:

Again, why is Partington Local Centre specifically mentioned in this objective? There are a number of other, equally important, local centres – why just mention one?

SO7 Protect, improve and connect green assets:

Please separate (a) open spaces and sports facilities from (b) ecology and biodiversity. We think the statement about the use of brownfield developments fits better within SO1 (reworded as we have suggested above).

We are concerned that the document shows limited recognition of the extent to which Carrington Moss, for example, is used, on a daily basis, for horse riding, bearing in mind that there are over 26 livery yards/stables/riding centres, plus an Equine College on and around Carrington Moss, hosting around 1,060 horses. With that in mind, please add the following statement to SO7 Objective (a) *“The Transpennine Trail, Public Rights of Way Byways and Bridleways will remain fully accessible to all horse riders from stables on and around Carrington Moss”*.

We suggest the addition of a new S10 Objective for (b) which includes the following:

Secure measurable gains for biodiversity and the natural environment. Development is required to safeguard biodiversity by ensuring that: (i) development is not permitted where it would harm internationally, nationally, regionally, or locally designated nature conservation sites. (ii) development is not permitted where it would harm species which are legally protected or identified as in decline or rare. (iii) the movement of wildlife through wildlife corridors identified in the plan is not impeded by development. All development proposals must be based on ecological assessments, appropriate to the scale of the development, with surveys undertaken at appropriate times of year for the relevant habitats, species, flora and fauna. All development should positively contribute to biodiversity gain, restored ecosystems and people's access to nature by contributing new habitat features commensurate with the scale of development.

Should the statement about waterways recognise their importance as **blue** corridors (rather than green)? This statement should remain in the new S10 Objective.

Please confirm who has responsibility for the pollution in our waterways?

SO8 Reduce the need to travel:

We do not think this objective currently demonstrates the focus on prioritising the needs of pedestrians, cyclists and horse riders above the needs of the private car user.

Please add the following statements “Trafford recognises the potential for significant modal shift to walking and cycling for short journeys and aim, by the end of the plan period, to increase substantially the frequency of journeys using active travel options. Development that encourages car-free locations will be supported by improvements to high quality public and community transport. Development is not permitted where it would result in increases to air and/or noise pollution in any part of the Borough. Road-building will be regarded as the option of last resort as a means to address transport problems. Support will not be given to any road-building proposal unless it can be demonstrated, with the support of the majority of local residents, that all other possible alternatives, including non-road-building options and making more efficient use of existing infrastructure, have been fully considered and the evidence demonstrates that these do not provide an adequate solution”.

We think the statement about sustainable locations fits better with Objective SO1 (reworded as we have suggested above).

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SO9 Enhance cultural, heritage and leisure assets:

Please add the following statement at the end of this paragraph “*Trafford recognises that its peat mosses (at Carrington and Warburton) and Warburton Deer Park should be considered to be heritage assets and will be valued accordingly*”. Also, on Heritage Assets, “*Trafford will actively update its records of heritage assets and listed buildings, contributing to the NW Region Research Framework (<https://researchframeworks.org/nwrf/>) and collating and extracting from the framework information appropriate to the Trafford area.*”

13. Do you agree with the draft Trafford’s Places policies and feel that they capture the priorities for Trafford? If not, please explain why (providing supporting evidence where appropriate).

We do not agree with the following Places policies for the reasons given below.

TP6 Carrington and Partington:

This section of the document must be updated to provide an accurate description of the area.

Why are Carrington and Partington lumped together? They are two distinct communities and should be treated as such in the Local Plan.

There is a substantial expanse of peat moss, for example, (325 hectares according to The Wetlands of Greater Manchester academic study, 1995) at Carrington. The amount of green belt and protected open land dwarves the industrial space. It is, therefore, odd to suggest that the Carrington area has been dominated by a petrochemical works. It is totally disingenuous that the description of Carrington does not mention the highly valued areas of conservation and recreational space, the sites of biological importance and the sites of special scientific interest on and around Carrington Moss. Neither does it mention the red listed birds and endangered wildlife found in this part of Trafford, including the Willow Tit and the Water Vole. The large area of the best and most versatile grade 2 agricultural land is not described either and should be added. Neither are the large number of public rights of way and permitted routes, including the Transpennine Trail, which run right across Carrington Moss and provide extensive walking, cycling and horse riding tracks for large numbers of users. Local residents have benefitted immensely, in health and wellbeing terms, from free access to this wonderful green space, which has been extensively used throughout the pandemic.

It is misleading to suggest that there are planned public transport and active travel infrastructure improvements as part of the wider New Carrington development. We have submitted Freedom of Information Requests which have revealed that there are NO plans to increase or improve these modes of travel. In fact, the New Carrington Masterplan only suggests that public transport improvements “should be encouraged”. Both the New Carrington Masterplan and the Trafford Local Plan should strengthen the requirement for large scale developments **to commit to** public transport and active travel improvements.

This section of the document should reference Objective SO2 as the massive over-development of the area will lead to significant health inequalities caused by considerable increases in air and noise pollution.

This section of the document should reference Objective SO3, given the presence of the peat moss and its potential (if restored) to support significantly higher levels of carbon capture than those that can be achieved through technological solutions or other natural solutions. Carrington Moss also provides protection for existing local residents against substantial surface water flooding and provides an extensive green space to support the health and wellbeing of local communities.

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The plans for Carrington and Partington are not consistent with Objective SO4 as the employment proposed is all industrial and warehousing, it is highly unlikely that there will be the range of jobs available to suit skilled local residents, especially those with proficiencies in digital, technology and green capabilities (this also conflicts with Objective SO5). Furthermore, there has been no indication of the school places available for existing and new residents in Carrington and Partington, particularly primary school places. Unless sufficient school places are available for the planned developments, more commuter journeys will be required and inequality will be driven by the lack of capacity.

The plans for Carrington and Partington will also see a reduction in grade 2 agricultural land, this will lead to a reduction in the existing economic capacity of the area, conflicting with Objective SO5. The same will apply to the horse riding and livery economy, as there will be less opportunities for stable owners to exercise their horses and they may need to downsize or terminate provision of these local services. As mentioned in response to a previous question, there are over 26 livery yards/stables/riding centres, plus an Equine College on and around Carrington Moss, hosting around 1,060 horses. Objective SO5 should also include reference to the enhancement Carrington Moss and its areas of woodland, agriculture and conservation, which will bring “green” skills and jobs to the local economy.

Furthermore, it is our understanding that the employment site at Carrington does not offer small businesses the opportunity to purchase buildings, they are only available for rent, which is incompatible with the variety of requirements for businesses in Trafford.

The plans for additional housing and employment in Carrington and Partington are not consistent with Objective SO7, as currently articulated, as they require the release of 169 hectares of green belt and impact protected open land. As mentioned earlier in our response, we believe a Brownfield First policy and a Sustainable Location policy should be specifically articulated and prioritised in this Local Plan. The New Carrington allocation does not meet either of these requirements. We believe a post-covid review of available land supply for housing and employment will reveal alternative sites that could be proposed rather than releasing green belt land and developing on a peat moss (which is contrary to Trafford’s declaration of a climate emergency). In addition, smaller developments, spread across Trafford, will have less impact on communities than the large developments proposed in the GMSF (now P4E).

The New Carrington Masterplan is inconsistent with Objective SO8 as there is NO commitment to provision of increased public transport (developers are only encouraged to support this), there are no plans to implement trams or trains in this, the largest housing allocation in the GMSF (P4E) and one of the largest employment allocations.

As mentioned above, the lack of local provision of additional school places will lead to additional commuter journeys rather than reducing the need to travel, which is inconsistent with Objective SO8.

Please include horse riders at point (q).

Please include the peat moss as a heritage asset at point (r).

TP8 Sale:

This section of the document must be updated to provide an accurate description of the area. Transportation links are only “good” from Sale Town Centre. The whole of the Sale West area suffers from very limited public transport and isolation. In fact, in a local consultation by the Friends of Coppice Library, elderly residents in the Sale West area described Sundays as “Suicide Sundays” because of the lack of public transport.

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Why is the Sale West Estate specifically mentioned in the description of this part of Trafford, rather than the whole Sale West area? There are also very vulnerable residents living on the Bodmin Estate and the Epping Estate. Separating out the estate, formerly known as the Racecourse, from the rest of Sale West is wholly inappropriate.

There are no plans in the New Carrington proposals to improve public transport for this area.

This section of the document should reference Objective SO2 as the massive over-development close to the area will lead to significant health inequalities caused by considerable increases in air and noise pollution.

Objective SO3 should mention the surface water flooding which is currently averted by Carrington Moss. This could become a major risk for existing and new homes following the planned Sale West development on grade 2 agricultural land, that currently soaks up huge volumes of water. In the, now regular, high rainfall incidents the land is subject to deep surface water flooding which spreads into Dainewell Woods and the Transpennine Trail. Evidence of this can be found on the Carrington Lake page of our website at this link <https://friendsofcarringtonmoss.com/carrington-lake-2/>.

The plans for Sale are not consistent with Objective SO4 as there is no indication of the school places available for existing and new residents. Unless sufficient school places are available for the planned developments across Trafford, more commuter journeys will be required and inequality will be driven by the lack of capacity.

Where is the planned additional local retail provision in Sale West, as suggested at point (h), Objective SO6?

The plans for additional housing in Sale West are not consistent with Objective SO7, as currently articulated, as they require the release of green belt. This huge loss of green space will have a major impact on the Sale West communities, which is recognised in the New Carrington Masterplan and is, therefore, inconsistent with both the Vision and the Objectives in this Local Plan. As mentioned earlier in our response, we believe a Brownfield First policy and a Sustainable Location policy should be specifically articulated and prioritised in this Local Plan. The New Carrington allocation does not meet either of these requirements. We believe a post-Covid review of available land supply for housing and employment will reveal alternative sites that could be proposed rather than releasing green belt land and developing on a peat moss (which is contrary to Trafford's declaration of a climate emergency). In addition, smaller developments, spread across Trafford, will have less impact on communities than the large developments proposed in the GMSF (now P4E).

The New Carrington Masterplan is inconsistent with Objective SO8 as there is NO commitment to provision of increased public transport (developers are only encouraged to support this), there are no plans to implement trams or trains in this, the largest housing allocation in the GMSF (P4E) and one of the largest employment allocations. The Sale West area will, therefore, remain disconnected and will not have access to the employment, retail and community facilities mentioned at point (l), nor will car dependency be reduced as suggested in point (m). Whilst congestion and air pollution on the A56 is expected to be reduced (point o), congestion and air/noise pollution will be increased in Sale West due to the plan to bring huge volumes of HGVs per day closer to the Sale West area on the Carrington Link Road.

As mentioned above, the lack of local provision of additional school places will lead to additional commuter journeys rather than reducing the need to travel, which is inconsistent with Objective SO8.

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TP10 Urmston

The importance of the Urmston Active Neighbourhood should be emphasised. Another bullet point should be added after point (m) on page 30 which states “A *fully integrated cycle network is up and running in Urmston and is an exemplar site for additional schemes across Trafford*”.

TP12 Rural Communities:

This section of the document should reference Objective SO3, given the presence of Warburton moss and its potential (if restored) to support significantly higher levels of carbon capture than those that can be achieved through technological solutions. Warburton Moss also provides protection for existing local residents against substantial surface water flooding and provides an extensive green space to support the health and wellbeing of local communities.

Objective SO4 should mention that the impact of the massive over-development of the adjacent area will lead to significant health inequalities caused by considerable increases in air and noise pollution.

It is misleading to suggest that the villages will be protected from inappropriate development. The New Carrington Masterplan, as currently articulated, suggests a large scale development on the heritage asset that is Warburton Deer Park. In addition, the massive traffic flows which will follow that New Carrington development will destroy the character and quality of life in Warburton and Dunham. These villages are already under severe pressure, so even a small change will have a substantial impact.

Objective SO5 should include reference to the enhancement of the green spaces and the areas of conservation, which will bring “green” skills and jobs to the local economy.

In relation to Objective SO7, it is disingenuous to suggest that the “natural environment, landscape character, biodiversity and amenity of the area will be safeguarded” when the current New Carrington Masterplan will all but fracture the wildlife corridor to the River Mersey, and there is a plan to develop on a huge scale on the green belt and protected open land. Why will the network of green infrastructure only be enhanced with linkages to sites in the adjoining areas of Cheshire East and Warrington, what about the links to Carrington Moss and Stamford Brook? In addition, the current plan is for HS2 to dominate this landscape in the future, how will that “safeguard the landscape character”?

Please provide evidence that there are commitments to improve public transport as suggested at point (g).

Please add Warburton Moss and Warburton Deer Park to point (i)

14. If you feel the Local Plan should identify a different Trafford Place, please provide further information, including a map indicating its location.

An alternative to updating the description of Carrington would be to add Carrington Moss as a separate “place”. Given its impact on the surrounding communities of Broadheath, Carrington, Partington, Sale West and Warburton (to say nothing of its benefits to residents in the adjacent communities of Ashton on Mersey, Dunham, Flixton and Urmston. It is an important asset to Trafford and should be recognised as such, particularly given its potential to be restored to support Trafford’s efforts to become carbon neutral by 2038.

We have included a map within our Call for Sites submission and have a detailed document setting out our proposal to transform Carrington Moss into a carbon and biodiversity bank which we have already presented to Trafford and Regional officers, Carrington businesses

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and some local landowners. It has been developed with the help of the RSPB, Cheshire Wildlife Trust, Lancashire Wildlife Trust, Trafford Wildlife, the Greater Manchester Ecology Unit, a specialist from the North West Rare Plants initiative, local ecologists and other experts in the community, including bird watchers.

15. Do you agree with the draft Areas of Focus policies? If not, please explain why (providing supporting evidence where appropriate).

We disagree because the statements in this plan do not appear to recognise the significant changes to working practices and citizen behaviours following the pandemic. Areas which are currently designated for employment or retail may become vacant and could be used for housing or other purposes. The need for office space is likely to be significantly reduced in the future.

The Local Plan should commit to a comprehensive post-Covid review of land supply to ensure the Brownfield First and Sustainable Locations First policies can be applied.

The statement referencing “Safeguarded Land / Other Protected Open Land” should be updated to say that these areas will “*continue to be protected until a post-Covid review of land supply is complete and has been shared with residents to justify any proposed release of green belt or safeguarded/protected open land*”.

In relation to AF7 – New Carrington:

The description of this Area of Focus is, once again, disingenuous. The current plan is to **release 169 hectares of green belt**. Why is this not clearly stated as part of the description of AF7. The developments on brownfield land in this area have **already been approved**. The developments which are subject to the approval of the GMSF (now P4E) will all require the release of green belt.

The existing New Carrington Masterplan is not consistent with the Vision and Objectives set out in this Local Plan. We will obviously provide our detailed comments in response to the next iteration of the GMSF (P4E), for example, it should be recognised that peatlands are not a stable platform for development of any type (whether buildings or roads). This will mean that the peat needs to be removed and infilled with inert fill. This is not only costly (economically), it is also environmentally extremely damaging. In addition, the site viability calculations are likely to conclude that no affordable homes can be built.

It is proposed to remove substantial areas of the green belt in a way that fails to demonstrate “wholly exceptional circumstances”.

16. If you feel the Local Plan should identify a different Area of Focus please provide further information including a map indicating its location.

We believe a specific Area of Focus should be included for the Carrington and Warburton Mosses with the aim of transforming these areas into a carbon and biodiversity bank to support Trafford’s carbon neutral action plan and their declaration of a climate emergency.

We have included a map within our Call for Sites submission and have a detailed document setting out our proposal for transforming Carrington Moss into a carbon and biodiversity bank which we have already presented to Trafford and Regional officers, Carrington businesses and some local landowners. It has been developed with the help of the RSPB, Cheshire Wildlife Trust, Lancashire Wildlife Trust, Trafford Wildlife, the Greater Manchester Ecology Unit, a specialist from the North West Rare Plants initiative, local ecologists and other experts in the community, including bird watchers.

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17. Do you agree with the draft Inclusive Places policies IP1 – IP7? If not, please explain why (providing supporting evidence where appropriate).

No, we believe a new policy is needed to articulate how Trafford will work with communities from the earliest stages of plan-making, particularly where large scale developments are concerned. This does not mean just sending out documents for residents to read and review. It means comprehensive engagement, sitting round a table, involving Parish Councils and Community groups, such as ours, in workshops to determine the plans for their area. Communities should be seen as **THE** key stakeholder. Whilst this new policy should be linked to the Statement of Community Involvement, it should be included as a specific policy within the Local Plan because the Council's plan to work proactively with applicants is set out in Policy IP2.2.

Whilst we agree in principle with the other policies set out in this draft, some additions are needed as outlined below.

IP1.2 should include, under Residential led proposals, the following additional points:

- Equality of access to Trafford school places
- Ensure air and/or noise pollution levels do not increase for any communities
- Ensure air and/or noise pollution levels are reduced to below the internationally recognised maximums for any communities

Under Employment led proposals, please add the following:

- Offer a mix of purchase/tenanted properties of various sizes to ensure smaller businesses and start-ups are able to access appropriate premises
- Limit the over concentration of uses that would have adverse impacts on the health of Trafford's residents
- Ensure air and/or noise pollution levels do not increase for any communities
- Ensure air and/or noise pollution levels are reduced to below the internationally recognised maximums for any communities

There should be a new policy IP2.4 which articulates the process and actions Trafford will take where developments have been approved but a substantive element of the work has not been started within an agreed timescale, for example:

- where developers do not build within the agreed timescale, which is typically 3 years, the proportion of affordable housing should be increased by 5% for each year the development is later than the expiry date of the initial approval
- consideration of compulsory purchase orders
- consideration of requesting an alternative developer takes forward the build
- in former green belt areas, the Council will revert the land back to green belt once the period of approval has expired.

Add a new policy IP3.7 which proposes a comprehensive review of existing infrastructure to be completed with a view to improving walking and cycling facilities across the Borough, including, for example, continuous pavements, more pedestrian crossings that prioritise the pedestrian, traffic calming measures, fully integrating cycle infrastructure, a requirement for businesses, public transport hubs and retail areas to have secure cycle storage.

IP 5.2 should reference how density will be achieved without compromising comfort and wellbeing for residents, including, for example, town houses with garages built at ground floor level to reduce parking on local roads.

IP 5.3 should include Trafford's expectation that developers will consider and introduce schemes such as Low Traffic Neighbourhoods to support Objective SO8.

IP 6.2 should include the New Carrington and Timperley Wedge developments.

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18. Do you agree with draft policy HO1 in relation to the distribution of development, concentrating higher densities in the most accessible locations? If not, please explain why (providing supporting evidence where appropriate).

No, we believe Trafford should add a comprehensive post-Covid review of housing and employment land supply into the Local Plan, which should be the first item in this section of the document.

The expectation that a minimum of 18,546 net additional dwellings equates to an extremely high number of additional school places and health service requirements, both of which are inadequately covered in the Local Plan.

We believe the Windfall allowance is significantly underestimated, given the expected changes to working practices and citizen behaviours following the recent pandemic.

The current articulation of policies HO1.9 and HO1.10 is inadequate. Policy HO1.9 should be updated to make it clear that Trafford has a Brownfield First policy. Policy HO1.10 should be updated to make it clear that Trafford has a Sustainable First policy.

Policy HO1.13 should be amended as follows: The best and most versatile agricultural land will be protected. ~~where appropriate~~ Any risk of soil contamination will be avoided in all circumstances during the construction and operational phases of development.

The final paragraph of the Justification section needs to be reviewed. It is inconsistent to suggest that employment areas cannot be redesignated for housing when green belt is being released as part of the GMSF (P4E). As an example, office space requirements are expected to reduce considerably as a consequence of workplace changes following the recent pandemic. Office space which is no longer required or dilapidated industrial areas should be able to be redesignated for housing, where that is appropriate.

It is clear that smaller developments spread across Trafford will have a lower impact on local communities, rather than large scale developments.

19. Do you agree with our proposed approach of only allocating for major residential development, as defined in the National Planning Policy Framework?

This is an odd question as we understand there is no option other than to adhere to the National Planning Policy Framework. The first policy in this section should be updated to confirm that development will only be approved if it complies with all aspects of the NPPF.

In relation to land release for new development, the Friends of Carrington Moss have been working with local residents to identify brownfield sites that can be added to the Land Supply list to reduce the need to release green belt in Trafford. This list should be considered, alongside the post-Covid housing and employment land supply review, and the appendices to this draft Local Plan should be updated.

It is clear that smaller developments spread across Trafford will have a lower impact on local communities, rather than large scale developments.

20. Do you agree with the draft Land for New Homes policies HO2 and HO3? If not, please explain why (providing supporting evidence where appropriate).

See our response to the previous question.

The Justification sections need to be updated to refer to the post-Covid housing and employment land supply review and the Brownfield First/Sustainable First policies.

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21. Do you agree with the draft Meeting Housing Need policies HN1 – HN6? If not, please explain why (providing supporting evidence where appropriate).

Yes, totally agree but would add a policy which sets out the processes Trafford will adopt if developers do not deliver developments that have been approved within an agreed time period. Something along the lines of “*Trafford’s planning team will take the following action when approved development schemes are not delivered within the agreed period: xxx*”. This is alluded to in policy HN5.1 but not elsewhere.

Regarding policy HN4, can you confirm that Carrington Parish Council has been consulted in the plan to increase the number of pitches on the existing site? Can you also confirm that the pitches on the site provide a mix of accommodation for both the settled and the transitory communities?

Can you also confirm what action will be taken to protect sites of biological importance, sites of special scientific interest and agricultural land on or around Carrington Moss from illegal occupation once the area is opened up to traffic?

22. Do you agree with the draft Climate Change and Low Carbon policies CC1 and CC2? If not, please explain why (providing supporting evidence where appropriate).

We believe this policy is incomplete and should be updated with the following additional policies:

CC1.4 The Council will ensure that our natural resources are not irrevocably exhausted or the environment irreversibly damaged as a consequence of approved or planned development. This includes reducing harmful emissions, protecting and enhancing biodiversity and promoting the sustainable use of natural resources. The Council will ensure that planning decisions assist in the prudent and sustainable use of finite natural resources.

CC1.5 The Council will work proactively with the community and developers to identify solutions which support nature’s restoration and recovery.

CC1.6 All development shall minimise the impact of surface water runoff from the scheme in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.

It is fully recognised that restored peat mosses capture significant amounts of carbon, much more in fact than any other type of vegetation, including our trees.

A new policy, CC3, should be added which states that “*Trafford Council seeks to avert mass carbon release by preserving and restoring its peat mosses at Carrington and Warburton to maximise carbon sequestration opportunities in support of the carbon neutral action plan*”.

23 Do you agree with the draft Sustainable Transport and Accessibility policies ST1 – ST7? If not, please explain why (providing supporting evidence where appropriate).

Whilst we support these policies, much of the commitment to active travel appears to be on a reactive and piecemeal basis, dependent on ad hoc opportunities to work with partners and developers, with no references to any proposal to systematically identify that ‘integrated active travel network’. We would want to see a commitment to identifying active travel routes throughout Trafford in a much more proactive and comprehensive way to allow for the proactive creation/development of such routes.

We would like to see the following added to this section of the Local Plan:

- ST1.1 please add confirmation that key stakeholders includes the community.

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- (b) please strengthen to confirm that Trafford is committed to an Active Travel First policy.
- ST1.1 Please add *“New developments will not result in increases to air or noise pollution for any Trafford residents”*.
- ST1.1 Please add *“The Council will push TfGM to put in place the facilities to enable public transport users to take all bicycles on trams and buses”*.
- ST2.1 Please add *“The Council recognises the potential for significant modal shift to walking for short journeys and will aim, by the end of the plan period, to increase substantially the frequency of journeys under one mile long made on foot. This will be achieved by providing direct, well-maintained, and well-lit walking routes, including to and from schools, slowing down traffic with 20mph zones. The Council also recognises the potential for a significant modal shift to cycling for short and medium journeys and aims, as a minimum, to increase the frequency of journeys made by bike by the end of the plan period. This will be achieved by providing a comprehensive network of cycle-friendly streets, multi-use paths and cycle routes in both urban and rural areas. Where possible, the Council will ensure that commuter cycling routes are segregated from pedestrian routes. The Council is committed to working proactively to achieve that modal shift and will to establish an initiative to work with partners, including community representatives, to identify a comprehensive and integrated active travel network that will best serve the needs and interests of all potential users. The Council will ensure appropriate segregation of different categories of users, including horse riders, on that active travel network.*
- ST3 Please add *“All development will be compliant with the vision set out in the Greater Manchester Transport Strategy 2040, which aims to reduce car journeys by 50%”*.
- ST3.7 Needs to be strengthened to specifically commit to improving the bus network in all parts of Trafford.
- ST3.13 Why is Carrington/Partington not included, especially when the Broadheath to Irlam line is designated as safeguarded?
- ST4 Please add *“It is recognised that rising traffic levels are causing major environmental, economic and social problems and that road building provides neither a medium nor a long-term solution to traffic problems. Road building will be regarded as the option of last resort as a means to address transport problems. Support will not be given to any road-building proposal unless it can be demonstrated that all other possible alternatives, including non-road-building options and making more efficient use of existing infrastructure, have been fully considered and that clear evidence demonstrates that these alternative options do not provide an adequate solution”*.
- ST4.6 Please add *“The Carrington Link Road proposal will be reviewed in the light of the climate change policies in this Local Plan and Trafford’s aim to be carbon neutral by 2038”*.
- Please add ST4.8 *“Carrington Parish Council and the Friends of Carrington Moss have proposed a bridge across the Manchester Ship Canal to connect businesses in Carrington to the A57 in Irlam to reduce the impact of traffic, air and noise pollution and to provide faster access for HGV traffic initially to the M6 and the M60, but longer term, to Port Salford, to transport goods via rail and ship. This proposal will be fully explored to determine its viability”*.
- Please add ST5.5 *“Consideration will be given to the need for a small Freight link in Carrington to reduce HGV traffic and enable goods to be transported by rail”*.
- ST6.3 should confirm that parking requirements do not compromise density requirements (can be addressed by using a town house design, as mentioned above).

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- Please add ST6.4 “Developers will be encouraged to design Low Traffic Neighbourhoods. With this in mind, all car parks in Trafford will be reviewed to determine their suitability for alternative development”.
- ST7.1 should include reference to the provision of secure cycle storage to encourage active travel.
- ST7.3 include reference to a “phasing out date” for off-airport car parking to encourage use of public transport.

ST4.6 Please confirm that the expected significant increase in traffic on the Carrington Spur caused by the construction of the Carrington Link Road and the planned New Carrington developments will not jeopardise the health and wellbeing of the pupils at All Saints Catholic Primary School. The harmful impact of HGVs is recognised at ST7.4.

Why are Lorry Management schemes not considered for Carrington as well as Trafford Park?

24. Do you agree with the draft Trafford’s Economy policies EC1 – EC3? If not, please explain why (providing supporting evidence where appropriate).

Whilst we support these policies, we would like to see the following added:

- EC1.3 please add a reference to a regular review of this information (at least 6 monthly).
- EC1.4 (unused number) Please add “Whilst there are vacant employment parcels in other locations, no green belt release for employment purposes will be approved in Trafford. In addition, a comprehensive post-Covid review of housing and employment land supply will be undertaken prior to any release of green belt. No additional office space will be approved until that comprehensive review has been completed.”.
- EC1.9 Please add “Digital, technology and creative services will also be provided from the New Carrington employment area to ensure it meets the expectations of sustainability”.
- EC2.1 Please reconfirm “Whilst there are vacant employment parcels in these key employment areas, no green belt release for employment purposes will be approved in Trafford”.
- EC2.7 Please reconfirm “Whilst there are vacant employment parcels in these local employment areas, no green belt release for employment purposes will be approved in Trafford”.

Within the Justification section, green jobs should be added to the list of key economic growth sectors in Trafford.

The evidence base is now 2 years out of date, when will this be updated?

Broadheath (EC3) has a significant number of vacant employment parcels. Developers wishing to build on the green belt should be encouraged to revitalise this area prior to any green belt being released. That said, this area does have school places and the land is adjacent to other housing, making it an option for redesignation to housing land supply, rather than releasing green belt for this purpose.

25. Do you agree with the draft Town Centres and Retail policies TC1 – TC3? If not, please explain why (providing supporting evidence where appropriate).

Agree in principle with these policies. Flexibility is important and should be tested in the post-Covid review of housing and employment land supply.

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26. Do you agree with the draft Historic Environment policies HE1 – HE4? If not, please explain why (providing supporting evidence where appropriate).

Agree in principle with these policies. The list at HE4.7 should be updated to include the Carrington and Warburton mosses, Warburton Deer Park and the Carrington Rides.

27. Do you agree with draft Culture and Tourism policy CT1? If not, please explain why (providing supporting evidence where appropriate)

The list at CT1.1 should also include the Carrington and Warburton mosses and Dainewell woodlands, as these sites support mindfulness, health and wellbeing opportunities and social prescribing. They are also sites for education and awareness, particularly as they are rich in ecology and biodiversity.

28. Do you agree with the draft Green Trafford policies GT1 – GT3? If not, please explain why (providing supporting evidence where appropriate).

Disagree as there is a huge gap in relation to our peat mosses.

Please add the following new policies

Peat Mosses.

GT1.10 Trafford's peat mosses at Carrington and Warburton will be protected and restored to enable carbon sequestration and support for the carbon neutral action plan.

GT1.11 Trafford will work with partners, including the local community, to determine the future strategy to transform these peat mosses into carbon and biodiversity banks.

GT1.12 Trafford will seek to reintroduce and/or revive plant, bird and wildlife species that have previously or currently inhabited its mosslands.

The bullet points in the Justification section at the top of page 119 describe Carrington Moss. We would argue that it is just as important an asset as Sale Water Park as it has stronger features in relation to many of the Local Plan policies, including Water, Culture and Tourism, Natural Environment, Climate Change and Open Space. Exploiting the potential carbon sequestration opportunities at Carrington Moss is essential to Trafford meeting its carbon neutral aims. Please add and describe Carrington Moss in the Justification description for GT1.

In the Justification relating to Green Belt (page 121) the following should be added "*Trafford has the lowest proportion of green belt in the whole of Greater Manchester except for the city areas of Manchester and Salford*".

Please include reference to incorporating hedgehog and wildlife highways in all new development.

We strongly agree in principle with the other draft policies in this section.

29. Do you agree with the draft The Natural Environment policy NE1? If not, please explain why (providing supporting evidence where appropriate).

Trafford should set out an overarching commitment to support nature's restoration and recovery, at the beginning of this section. We, therefore, believe NE 1.1 should be updated to include the following paragraph at the beginning:

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“The Council commit to protecting, enhancing and improving our natural environment, whether its key purpose is for recreation, flood mitigation, wildlife habitat, carbon sequestration or amenity. The Council will protect existing sites of biodiversity, sites of special scientific interest and other conservation areas, their nature features and the landscape character to support nature’s restoration and recovery.”

We believe the natural environment assets set out in Appendix 2 and on the policies map need to be updated. What is the plan/process for this? We would particularly like to see the area covered by our call for sites for Carrington and Warburton Mosses comprehensively assessed for ecological and biodiversity value, with associated protections and designations being implemented.

Whilst we strongly agree in principle with the other policies set out in this section, once again Carrington and Warburton Mosses, the Carrington Rides and Warburton Deer Park have not been included in the list of Biodiversity Opportunity Areas. As these sites have as much to offer as the sites listed, please add them to policy NE1.6.

30. Do you agree with the draft Open Space, Sport and Recreation policies OS1 – OS3? If not, please explain why (providing supporting evidence where appropriate)

Whilst we strongly agree in principle with these policies, there is no reference to walking and cycling as a sport/hobby or horse riding. Organisations such as the Social Prescribing team, Walking for Health, Ramblers Trafford, Peak and Northern Footpath Society, Trafford’s Cycling Forum and the British Horse Riding Society should be mentioned as key partners in Trafford’s aim to improve the health and wellbeing of its population.

It should be noted that, as mentioned in a previous response, Carrington Moss is used, on a daily basis, for horse riding. There are over 26 livery yards/stables/riding centres, plus an Equine College on and around Carrington Moss, hosting around 1,060 horses.

31. Do you agree with the draft Natural Resources policies NR1 and NR2? If not, please explain why (providing supporting evidence where appropriate).

Whilst we agree with these policies, we believe an additional Natural Resources policy should be added to cover peat as a natural resource.

Policy NR3 should include the following:

“NR3.1 Trafford’s peat mosses at Carrington and Warburton will be preserved and restored to maximise carbon sequestration and support achievement of our aim to be carbon neutral by 2038”.

32. Do you agree with the draft Water and Flood Management policies WF1 and WF2? If not, please explain why (providing supporting evidence where appropriate)

Whilst we agree with these policies, please a new policy as follows:

“WF1.5 Where there has been extensive surface water flooding in previous years, developers will be expected to ensure that adequate drainage is planned for the site to mitigate the risk of flooding for existing and new home owners”.

33. Do you agree with the draft Environmental Protection policies EP1 – EP4? If not, please explain why (providing supporting evidence where appropriate).

Whilst we agree in principle with the draft policies, please add the following:

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“EP1.4 In order to support Trafford’s Brownfield First policy, the Council will work with developers to secure available public funding to support remedial work on brownfield sites”.

“EP2.3 Development which would result in increased noise pollution for existing Trafford residents will not be approved”.

“EP3.1 (h) Developers will be encouraged to design Low Traffic Neighbourhoods into their schemes”.

“EP3.2 Development which would result in increased air pollution for existing Trafford residents will not be approved”.

EP3.3 Businesses which release pollutants into the local atmosphere will be encouraged to fund additional air quality monitors and work with local community groups to agree remedial action, such as tree planting and the creation of green infrastructure.

EP3.4 Trafford will preserve and restore its peat mosses at Carrington and Warburton to support high carbon capture capabilities.

EP4.2 Businesses will be required to alert residents about the potential impact of local hazardous installations and residents will be informed about the outcome of regular simulation exercises and disaster recovery tests.

Please add to the Justification section “Peatlands are the largest natural terrestrial carbon store, holding more carbon than any other vegetation type, more than double the amount of our trees, for example. Trafford has two peat mosses, one in Carrington and one in Warburton. Both mosses will be preserved and restored to enable carbon sequestration and to mitigate the impact of air pollution in the area.

34. Do you agree with the draft Planning Obligations policy PO1? If not, please explain why (providing supporting evidence where appropriate).

Whilst we agree in principle with these policies, please add the following:

PO1.4 Please add Traffic Calming measures and air/noise quality monitoring equipment to the list.

Please add the following policy

Timescale for completion of approved development

PO1.11 Developers will be required to commence and complete developments within a timescale agreed with Trafford Council. Development not completed to the agreed deadline will be subject to further action from the Council which could include the following:

- *where developers do not build within the agreed timescale, which is typically 3 years, the proportion of affordable housing should be increased by 5% for each year the development is later than the expiry date of the initial approval*
- *consideration of compulsory purchase orders*
- *consideration of requesting an alternative developer takes forward the build*
- *in former green belt areas, the Council will revert the land back to green belt once the period of approval has expired”.*

Please add to the Justification section

It is important that Trafford meets its obligations, set by the Government, to deliver its annual housing quota. If developers are unable, or unwilling, to deliver approved housing or employment schemes, Trafford may take one or more of the following actions: xxx