

Date: 22 March 2021
Our ref: 345785
Your ref: Carrington Relief Road



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BY EMAIL ONLY

Dear Sir/Madam,

Carrington Relief Road – Preliminary Options Appraisal Report (Amey Consulting, October 2020)

Thank you for your email on the above dated and received by Natural England on 04 March 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have reviewed the Preliminary Options Appraisal Report and have the following comments to make:

Natural England acknowledge that a full Environmental Scoping Report will be produced and we advise that this is done to help inform the decision of the preferred route for the relief road. Environmental constraints should be given appropriate weight when determining the preferred option.

3. Route Options

We note that the full Environmental Scoping Report is not yet available but the Options Appraisal Report states that a desktop assessment has been carried out. We are disappointed that the findings of the environmental desktop study are not fully reflected in the appraisal of the route options. Appendix D contains slightly more information on the environmental constraints but is not an accurate representation.

5.3 Option F Risks

The environmental risks have not been included in this section although they were included in Chapter 5.2 (Option A Risks). We think this presents an inaccurate and unbalanced view of the environmental constraints and it is Natural England's view that Option F would be considerably more damaging than Option A.

The potential risks associated with Option F Route that will require careful consideration in the Environmental Scoping Report are:

- **Priority Habitat as identified on Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006.** The proposed Option F Route would involve development on areas of deep peat and is in close proximity to Lowland Raised Bog, listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. Blanket Bog/Peat represents the largest terrestrial carbon store in the UK. Peatlands also perform an important role in water catchment management-both water quality and water storage. As such there is widespread concern that development in these areas may have adverse impacts on the

biodiversity, carbon value and water management functions of these areas.

- Development on peat will cause permanent damage of the habitat and lead to a huge loss of carbon to the atmosphere, this would appear to conflict with Trafford Council's commitment to tackle climate change and work towards carbon neutrality for Trafford. The current Trafford Core Strategy includes the objective to '*protect and enhance the Mosslands as a natural carbon sink to mitigate the effects of climate change.*' (RCO12).
- Damage to Carrington Moss Site of Biological Importance (SBI) and relic bog habitat – NPPF (para 175c) that specifies: "*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran tress) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*". Blanket bog is an irreplaceable habitat that should be protected. Development on peat will destroy a much larger area of habitat than the actual footprint of development due to hydrological dependency/linkages.

Please see Annex A for additional advice, we have also attached a copy of Natural England's research paper 'Greater Manchester Peat Pilot' for your information to the e-mail (Annex B), it largely covers the damaging aspects of turf production but it is a useful document that reinforces the value of peat and the carbon losses resulting from degraded/damaged peat.

For any queries relating to the specific advice in this letter only please contact me on janet.baguley@naturalengland.org.uk . For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Janet Baguley
Lead Adviser – Urban and Wetlands Team

Annex A

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#) Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wildflower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website

www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).