

# FOCM MIQ Response – Matter 5



Friends of Carrington Moss  
Matter Number 5

## Matter 5: Key Diagram and policies JP-Strat1 to JP-Strat11

**Issue 5.1 Does the Key Diagram (Figure 3.1) effectively illustrate the spatial strategy and indicate the broad locations for development proposed in the Plan?**

**Q5.1 (a) Does the Key Diagram (Figure 3.1) effectively illustrate the spatial strategy and indicate the broad locations for development proposed in the Plan? (b) Does the notation panel need to be modified to use terminology consistent with policies in the Plan and/or to refer to relevant policies?**

- a) Given the Policies Map is tucked away in an Appendix, it would be helpful for the graphic to indicate where green belt will be released (perhaps showing number of hectares to be released in a box), along with the **committed** transport interventions (only) from the Transport Delivery Plan.
- b) It would be helpful for the Key Diagram to use consistent terminology and also to identify all the Strategic Locations (see figure 6.1 p113) – sometimes called Key Locations. Port Salford is, for example, missing from the Key Diagram (Salford Town Centre is missing from figure 6.1).

**Word Count: 96**

**Issue 5.2 Are the diagrammatic maps (Figures 4.2 to 4.8 and Picture 4.8) justified, and do they help to ensure that policies JP-Strat1 to JP-Strat11 can be effectively applied?**

**Q5.2. (a) Is the content of Figures 4.2 to 4.8 and Picture 4.8 justified? (b) Do those diagrammatic maps help to ensure that policies JP-Strat1 to JP-Strat11 can be effectively applied? (c) Should the Plan be modified to clarify the purpose of the diagrammatic maps and the status of the transport infrastructure improvements that are shown?**

- a) It is useful to have graphical representations of the Policies as this does help those who struggle with the huge number of words in this document. The graphics can only be considered to be justified if they are accurate.
- b) The Policies can only be supported in being effectively applied if the graphics are accurate – figure 4.8 (New Carrington), for example, does not show Port Salford, yet the proximity of that location is specifically referenced in the site selection criteria.
- c) It is important to clarify the status of the transport infrastructure improvements and clearly explain the difference between “committed” and “uncommitted” transport initiatives and how the lack of certainty of their delivery impacts the sustainability of the Policies.

**Word Count: 120**

## FOCM MIQ Response – Matter 5



**Issue 5.3 Is the purpose and nature of policies JP-Strat1 to JP-Strat11 clear such that they will be effective?**

**Q5.3. Are policies JP-Strat1 to JP-Strat11 clearly written and unambiguous such that they will be effective in terms of (a) providing a strategic framework for local plans and/or (b) informing the preparation and determination of planning applications?**

- a) Genuinely sustainable development needs to be highlighted more actively. These Policies appear to prioritise the economic elements of the Plan to the exclusion of both the social and the environmental. This needs to be addressed if they are expected to provide a strategic framework for local plans. Green spaces, for example, are important even in the Core Growth Area. It is also not clear how these Policies draw on the Thematic Policies (and vice versa).
- b) Again, some tailoring needed. JP-Strat 6 (p62) says, for example, “Development in this location will be of good quality and design”. Surely that will be the case everywhere? Similarly, the final sentence (p63) will apply to all locations. It might be useful to link to consistent, standard wording to confirm expectations such as this one.

**Word Count: 132**

**Issue 5.4 Are policies JP-Strat1 to JP-Strat4 relating to the Core Growth Area justified and effective?**

**Policy JP-Strat1 Core Growth Area**

**Q5.4. Are policies policy JP-Strat1 and JP-J1 part G(iii) sound? In particular:**

- a) Are policies JP-Strat1 and JP-J1 part G(iii) justified and effective in protecting and enhancing the economic role of the “Core Growth Area” while also promoting significant increase in the number and range of homes?
- b) Are policies JP-Strat1 and JP-J1 part G(iii) clearly written, such that they would provide an effective strategic framework for local plans and an unambiguous policies to inform the preparation and determination of planning applications?
- c) Is it necessary for soundness to delete reference in policy JP-Strat1 to 98,000 dwellings and to insert reference in the reasoned justification to 69,000 homes?

Please refer to our representation p15.

**Word Count: 6**

**Policy JP-Strat2 - City Centre**

**Q5.5. Are policies JP-Strat2, JP-J1 part G(i) and JP-J3 part 1 sound? In particular:**

- a) Are policies JP-Strat2, JP-J1 part G(i) and JP-J3 part 1 justified and effective in seeking to strengthen the economic role, including as a focus for office and innovation-based development, of the “City Centre” while also expanding the area’s residential role?
- b) Are policies JP-Strat2, JP-J1 part G(i) and JP-J3 part 1 clearly written, so that they would provide an effective strategic framework for local plans and unambiguous policies to inform the preparation and determination of planning applications?

## FOCM MIQ Response – Matter 5



**c) Is it necessary for soundness to delete reference in policy JP-Strat2 to 2,200,000 sqm of office floorspace, 56,000 new dwellings and minimal industry and warehousing (35,000 sqm) and insert these figures into the reasoned justification?**

Please refer to our representation p16.

**Word Count: 6**

### **Policy JP-Strat3 - The Quays**

**Q5.6. Are policies JP-Strat3, JP-J1 part G(ii) and JP-J3 part 2 sound? In particular:**

**a) Is “The Quays” a suitable location for nationally significant economic activity, including being a focus for office space, and expansion of its residential, leisure and tourism roles?**

**b) Are policies JP-Strat3, JP-J1 part G(ii) and JP-J3 part 2 clearly written, such that they would provide an effective strategic framework for local plans and unambiguous policies to inform the preparation and determination of planning applications?**

**c) Is it necessary for soundness to delete reference in policy Strat3 to 12,500 new dwellings, 192,000 sqm of office floorspace and around 6,000 sqm of industry and warehousing and insert these figures into the reasoned justification?**

Please refer to our representation p18.

**Word Count: 6**

### **Policy JP-Strat4 Port Salford**

**Q5.7. Are policies JP-Strat4 and JP-J1 part G(vi) sound? In particular:**

**a) Are policies JP-Strat4 and JP-J1 part G(vi) justified in identifying Port Stratford as a suitable location for a tri-modal facility that will deliver 500,000 sqm of employment floorspace?**

**b) Given the scale of existing commitments and the requirements of policy JPA29, how is it anticipated the 500,000 sqm of employment floorspace will be delivered?**

**c) Are policy JP-Strat4 and JP-J1 part G(vi) otherwise clearly written, such that they would provide an effective strategic framework for local plans and unambiguous policies to inform the preparation and determination of planning applications?**

Please refer to our representation p19.

- a) The Policy requires some changes in emphasis to ensure it meets National Policy requirements for sustainable development. It currently focuses on the opportunity for significant economic growth, but given the area requires the release of green belt, much of which is Grade 1 bmv agricultural land and irreplaceable habitat, significant effort should have been made to consider alternative options that reduce the land footprint for this site.

In addition, whilst we welcome the development of an inland port, we have concerns that insufficient focus has been given to how it meets the Thematic Policies within the Plan (such as, for example, Strategic Green Infrastructure, Carbon and Energy, Resilience and Clean Air).

Furthermore, connectivity to other large developments should be explained. New Carrington, for example, where the brownfield sites already have planning approval and are being constructed, has no current or planned direct link to Port Salford to

## FOCM MIQ Response – Matter 5



reduce HGV traffic on local roads. The Policy should be strengthened to require that freight movements use sustainable routes to get to the Port.

- b) Innovative options, such as multistorey warehousing, should be proposed for this site to reduce the require land-take and the impact on Grade 1 agricultural land and irreplaceable habitats.
- c) The wording in the Policy does not provide an effective framework for local plans or planning applications as it does not make any mention of green infrastructure or the restoration of peat mosses to deliver broader sustainability objectives. Nor does the Policy consider how residents and local wildlife will be protected from the impact of huge increases in air, noise and light pollution.

There is no information in the Plan that sets out the current shipping using the Manchester Ship Canal and the expected future traffic, how it will grow and what the implications of that growth will be (for example, road bridges across the ship canal will have to be lifted for ships to pass through). This will be an important consideration, particularly for planning applications that may be impacted by such growth.

**Word Count: 342**

### **Issue 5.5 Is policy JP-Strat5 relating to Inner Area Regeneration justified and effective?**

#### **Policy JP-Strat5 Inner Areas**

**Q5.8. Is policy JP-Strat5 sound? In particular:**

- a) Are the “inner areas” a suitable location for “high levels of well-designed new development”, comprising a mix of housing and necessary supporting infrastructure?
- b) Would it be clear to decision makers which area of Greater Manchester the policy applies to and would the Plan be effective in this regard?
- c) Is it necessary for soundness to delete reference in the policy to 270,000 sqm of office, 132,000 sqm of industry and warehousing and 30,000 new dwellings and insert these references into the reasoned justification?
- d) Is policy JP-Strat5 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?

Please refer to our representation p21.

**Word Count: 6**

### **Issue 5.6 Are policies JP-Strat6 to JP-Strat8 relating to the Boosting Northern Competitiveness justified and effective?**

#### **Policy JP-Strat6 Northern Areas**

**Q5.9. Is policy JP-Strat6 sound: In particular:**

- a) Is policy JP-Strat6 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?

## FOCM MIQ Response – Matter 5



**b) Is the proposed modification relating to selective release of Green Belt and safeguarded land necessary to ensure soundness and would it be effective in that regard?**

Please refer to our representation p22.

**Word Count: 6**

### **Policy JP-Strat7 North East Growth Corridor**

**Q5.10. Is policy JP-Strat7 sound? In particular:**

**a) Is the “North East Growth Corridor” (as indicated on Picture 4.2) a suitable location for nationally-significant economic activity and a significant increase in residential development?**

**b) Is it necessary for soundness to delete reference in the policy to one million sqm of floorspace and 19,000 dwellings and to insert reference in the reasoned justification to one million sqm of floorspace and 16,000 dwellings?**

**c) Is the policy relating to the High Crompton Broad Location justified and consistent with national policy? Would the proposed modification to paragraph 4.49 provide adequate reasoned justification for the High Crompton Broad Location?**

**d) Is policy JP-Strat7 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?**

Please refer to our representation p23.

**Word Count: 6**

### **Policy JP-Strat8 Wigan Bolton Growth Corridor**

**Q5.11. Is policy JP-Strat8 sound? In particular:**

**a) Is the “Wigan-Bolton Growth Corridor” (as indicated on Figure 4.6) a suitable location for regionally significant economic and residential development?**

**b) Is Policy JP-J1 part G(viii) justified in identifying the M6 logistics hub in Wigan (extending into Warrington, St Helens and West Lancashire) as providing a major cluster of warehousing and distribution activity along the M6 corridor?**

**c) Is it necessary for soundness to delete reference in the policy to just over million sqm of floorspace and 13,000 dwellings and to insert reference in the reasoned justification to just over one million sqm of floorspace and 13,000 dwellings?**

**d) Is the policy relating to Hulton Park and land at Royal Bolton Hospital justified and consistent with national policy?**

**e) Is policy JP-Strat8 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?**

Please refer to our representation p24.

**Word Count: 6**

## FOCM MIQ Response – Matter 5



**Issue 5.7 Are policies JP-Strat9 to JP-Strat11 relating to Sustaining Southern Competitiveness justified and effective?**

### **Policy JP-Strat9 Southern Areas**

**Q5.12. Is policy JP-Strat9 sound? In particular:**

**a) Is policy JP-Strat9 justified in identifying the “Southern Areas” as an area where economic competitiveness and distinctive local neighbourhood character and environmental attractiveness will be protected and enhanced? Is the policy also justified in prioritising brownfield land, promoting the roles of town centres and other key assets and expecting an increase in the area’s residential offer and strengthening of its economic role?**

**b) Is it necessary for soundness to modify the first paragraph of the policy in terms of Green Belt release?**

**c) Is policy JP-Strat9 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?**

Please refer to our representation p25.

- a) The wording in this Policy is very misleading. The emphasis and prioritisation for the Allocations is not on the re-use of brownfield land and, as such, is non-compliant with NPPF paragraph 119. In addition, the Policy should accurately describe the proposals within JP-Strat 9. Green belt loss is extensive, labelling it as “*selective release of Green Belt in key locations*” is disingenuous. In addition, despite its size, New Carrington is not considered to be a “*key location*”. Whilst the Policy states (page 69) that development “*will seek to identify opportunities to protect and enhance the natural and historic environments*”, its focus is on economic growth. It fails to mention any of the area’s strategic green infrastructure assets, or the natural capital/ecosystem service benefits they bring. The balance required to achieve sustainable development has not been satisfied and evidence of exceptional circumstances to release green belt has not been substantiated.

Furthermore, the Policy does not mention other aspects of future development, such as the restoration of peat mosses to deliver “*broader sustainability objectives*” (paragraph 4.61, p68).

- b) Yes, it would be helpful to make this clarification.
- c) The wording in the Policy should be updated to reflect accuracy as it currently does not provide an effective framework for local plans or planning applications.

Paragraph 4.63 (p69), suggests that the New Carrington development is “*focused around the former chemicals complex*”, when it is actually focused on and around the second largest peat moss in Greater Manchester, Carrington Moss. The land comprises peat moss, grade 2 best and most versatile agricultural land, wetland and woodland habitats.

**Word Count: 270**

### **Policy JP-Strat10 Manchester Airport**

**Q5.13. Are policies JP-Strat10, JP-J1 part G(iv) and JP-J3 part 3 sound? In particular:**

**a) Are policies JP-Strat10, JP-J1 part G(iv) and JP-J3 part 3 justified and effective in identifying Manchester Airport as a key location for economic growth and where benefits of the continued operation and sustainable growth of the airport should be maximised?**

## FOCM MIQ Response – Matter 5



**b) Is the geographical scope of the policy JP-Strat10 clear and unambiguous such that it would be effective in providing a strategic framework for local plans and/or considering planning applications?**

**c) Are policies JP-Strat1, JP-J1 part G(iv) and JP-J3 part 3 clear and unambiguous about the form and scale of development would be considered acceptable in principle at or around the airport?**

**d) Is the reference in policy JP-Strat10 to development being ‘in line’ with the CSRS justified, consistent with national policy and effective? In particular, (i) the relevance of this document for development outside Manchester Airport itself (ii) whether it unnecessarily duplicates other legislation that is outside the scope of the planning process and (iii) whether it would defer important policy matters to a separate document and whether such matters should be included in the Plan.**

**e) Are criteria 1-5 of policy JP-Strat10 clear and unambiguous in terms of development that is proposed through the Plan, development that is already committed, or development that is expected to be delivered through other Plans or strategies?**

**f) Is what constitutes the “Airport City” in criterion 1 of policy JP-Strat10 sufficiently clear and how is the 500,000 sqm of employment floorspace identified intended to be delivered? What of this are existing commitments and what is allocated in the Plan?**

**g) Is criterion 5 of policy JP-Strat10 clear and unambiguous in terms of what is meant by “providing sufficient development to take full advantage of the introduction of HS2 and NPR into this location”?**

**h) How are criteria A-F of policy JP-Strat10 intended to be used either in providing a strategic framework for local plans or informing the preparation and determination of planning applications?**

**i) Is policy JP-Strat10 otherwise clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?**

Please refer to our representation p26.

a) This Policy proposes the growth and expansion of Manchester Airport at the expense of our rural economy and our greenbelt. Given each district, all Health Authorities and the GMCA have declared a climate emergency, maximising growth should be done in the context of achieving GM’s target to become carbon neutral by 2038. Expansion should not be agreed until climate-friendly fuel becomes a reality and there are reductions in the impact of particulate matter on the health of humans and wildlife.

Growth is described in the Policy as being “sustainable”, yet paragraph 4.68 suggests the region’s key gateways and economic centres are seeking connectivity via improvements to the road network. To be sustainable, the Policy should be fully focused, for planning and investment, on sustainable passenger and freight transport options.

b) Innovative approaches should be considered to limit the land footprint required and the Policy should make clear which of the Transport Delivery initiatives are committed and which are not. More detail is needed to confirm the actual geographical scope of this Policy.

c) More detail is needed to ensure the Policy is clear and unambiguous about the form and scale of development that would be considered acceptable in principle within the geographical scope of this Policy.

d) The scope and applicability of this CSRS needs to be clearly confirmed, as does the primacy of national planning policy, including that relating to the climate emergency.

## FOCM MIQ Response – Matter 5



It may be helpful to include a list showing when the CSRS will be taken into consideration. In addition, whilst this short document has many admirable features, it does not actually demonstrate how MAG will achieve carbon neutrality. In fact, both the Plan and the CSRS both lack robust data about emissions that confirm what the airport emissions are today, what they are expected to be in 2038 and post further growth. This data is essential for understanding the impact of this Policy on achieving GM's target to become carbon neutral by 2038.

- e) The Policy is not clear about which elements of the developments mentioned in criteria 1-5 of JP-Strat 10 are proposed through this Policy in the Plan, which are already committed/delivered and which are expected to be delivered through other Plans or Strategies.
- f) Criterion 1 of this Policy is not clear about what constitutes the Airport City or how the employment floorspace will be delivered.
- g) Criterion 5 of this Policy is not clear about what constitutes “*sufficient development to take full advantage of the introduction of HS2 and NPR*”
- h) It is not clear whether criteria A-F of the Policy are intended to be used either in providing a strategic framework for local plans or informing the preparation and determination of planning applications. Clarity also needs to be provided about whether these items are committed or not committed in the Transport Delivery Plan.
- i) The wording in the Policy does not provide an effective framework for local plans or planning applications as it does not make any mention of green infrastructure. Nor does the Policy consider how residents and local wildlife will be protected from the impact of huge increases in air, noise and light pollution as a consequence of airport expansion. This impact would need to be considered in local plans and planning applications.

There is no information in the Plan that sets out the current volume of airport traffic and the expected volume of future growth. There is no indication of how high that growth is expected to be in terms of flight numbers, carbon emissions and pollution levels. This means that local plans and planning applications do not have the necessary strategic structure to work within.

**Word Count: 615**

**Q5.14. a) Is part 3 of policy JP-C6 justified and consistent with national policy in supporting the expansion of air freight at Manchester Airport? Would the policy be effective in supporting efficient and sustainable movement of freight?**

**b) Is this part of the policy intended to refer only to allocation JPA10 – Global Logistics Park?**

Please refer to our representation p118.

- a) Policy JP-C6 is light on detail. The Policy should be updated to clarify that such expansion will only be considered in the context of GM's target to achieve carbon neutrality by 2038. The Policy should confirm that freight is expected to be moved from the airport by rail, especially given the investment of public funds in HS2. National Policy suggests (paragraph 11) that plans should promote sustainable patterns of development, including ways of mitigating climate change and that (paragraph 154) new development should be planned for in ways that “*avoid increased vulnerability to the range of impacts arising from climate change*”. The expansion of air freight must be able to demonstrate compliance with the Government's [planning guidance about climate change](#).

## FOCM MIQ Response – Matter 5



- b) The document needs to clarify that this part 3 of Policy JP-C6 refers only to Allocation JPA10 and that the Policy will only be applied when it can be confirmed that climate-friendly fuel is available and in use, that carbon emissions will not impact GM's target to achieve carbon neutrality by 2038 and that pollution levels are minimised.

**Word Count: 186**

### **Policy JP-Strat11 New Carrington**

#### **Q5.15. Is policy JP-Strat11 sound? In particular:**

- a) Is policy JP-Strat11 justified in identifying the New Carrington as a suitable location to deliver significant mixed-use development?**
- b) To ensure effectiveness, should the policy establish the full amount of development expected to be delivered in the New Carrington area?**
- c) Is policy JP-Strat11 otherwise clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?**

We do not believe JP-Strat11 is sound for the reasons set out in our representation (p27). As stated in our representation, the modification should withdraw this Policy (and Allocation) from this Plan to enable it to be reconsidered within Trafford's Local Plan, following genuine consultation with local residents.

In addition:

- a) We do not believe New Carrington is a suitable location for the following reasons:
- The case for exceptional circumstances to release green belt has not been made. The documentation does not demonstrate that New Carrington will be a sustainable location, nor is the viability and deliverability without question.
  - The key pillar of the case for exceptional circumstances is the growth and spatial options, which have not considered a climate emergency/environment-focused alternative.
  - There is sufficient flexibility and choice of sites across GM without needing to release green belt, given the predicted population increase for the region, and the likelihood of further brownfield land becoming available. No estimate has been made for large and medium windfall sites. We believe the Policy is not consistent with NPPF paragraph 141 (p42) which suggests that all reasonable alternative options should have been examined before concluding exceptional circumstances exist.
  - The Policy promises sustainable growth, yet a suburban option of the densities proposed for New Carrington is the least sustainable of those available. New Carrington will be, for the most part, accessed by car, as the Policy brings no trams, no trains and no commitment to increased bus services (we have validated this via an FOI request). It should be noted that JP-Strat 11 states there will be "*Major investment in active travel, public transport and highway infrastructure*", yet the Transport Delivery Plan has only one commitment, the Carrington Relief Road.
  - The Plan is not based on the most up to date SHLAA and FOCM identified alternative land supply not on Trafford's list.
  - A comprehensive evidence base has not been assembled, there are many gaps in relation to measuring what will be lost as a consequence of the release of green belt land. The green belt/protected open land area of the Allocation provides a huge number of ecosystem services. The Natural Capital Value is essential evidence and should be fully understood prior to the release of green belt. It is

## FOCM MIQ Response – Matter 5



impossible to mitigate the environmental impacts of destroying an irreplaceable habitat.

- JP-Strat 9 does not mention investment in New Carrington and, despite its size, it is not identified as a Strategic/Key Location.
- The Integrated Assessment (IA) highlighted a number of areas where the Policy performed poorly against the objectives (eg resilience to the effects of climate change, reducing risk of flooding and conserving/enhancing landscape), yet the Policy was not updated as the Plan relies on the Thematic Policies to meet the requirements of the objectives. JP-Strat 11 does not comply with many of the Thematic Policies in the Plan, is not consistent with Trafford's Policies (as assessed by the IA) and does not observe National Policy requirements.
- It is possible to restore the huge peat deposits on Carrington Moss, in accordance with the England Peat Action Plan and Natural England guidance.
- Given the lack of sustainable passenger and freight transport planned for the Allocation, there is no evidence that JP-Strat 11 will support the delivery of a carbon neutral Greater Manchester no later than 2038 (JP-S 2). The current Policy will result in significant increases to air (JP-S6), noise and light pollution and will increase the risk of local flooding (JP-S5).
- The Allocation area already contains a number of hazardous installations and there are several more in very close proximity. GM/Trafford should not be planning to increase the population (of both residents and employees) in an area that may have to be evacuated in the event of an incident, a disaster or an emergency arising.

We believe the release of green belt at New Carrington is premature and that there should be a comprehensive review of available land, involving residents. The results of that review should be published prior to any consideration of green belt release. Should the review result in any requirement to release green belt in the future, the implications should be fully understood by local residents and the resulting changes can be addressed within Local Plans.

- b) To ensure effectiveness, the Policy should not only confirm the full amount of development but also substantiate how that development will be sustainable, given the lack of any **committed** sustainable passenger or freight transport options.

The Policy should also clarify exactly which land is in scope for development (of roads, housing or employment) and which land will be retained in green belt, showing which areas will be accessible to the public and which will not.

- c) The New Carrington Policy and Allocation are altogether very confusing. The Allocation area includes brownfield land that already has planning approval (and buildings have been constructed) and green belt land that is not being released for development. In addition, Trafford has said in recent correspondence ([220722 Powner Stage 2 final.docx](#)) that "*Places For Everyone largely assumes that the CRR is in Place – and will require fresh transport infrastructure over and above what is being planned now*" yet there is no reference to this in either the Policy (paragraph 4.72 p75) or the Allocation (paragraph 11.333 p367). We believe both the Policy and Trafford's approach to progressing elements of the Allocation outside of this Plan, is extremely unclear in relation to its efficacy for both the local plan and for determining planning applications.

The lack of consistency between the numbers in this document and those in the supporting papers make it difficult to assess what is actually being considered and whether it is appropriate. It seems the Education department has estimated school places on the basis of 33% of the homes being 1 bedroomed, yet the New Carrington Topic Paper suggests the site will primarily deliver family housing (p79). The Transport Locality Assessment and its Addendum (09.01.15 and 09.01.27 respectively) report different numbers for both housing and employment space to the

## FOCM MIQ Response – Matter 5



main document and do not provide the required information to determine the actual level of traffic that will be using local roads.

**Word Count: 1,023**

**Total Word Count: 2,826**

Kind regards

Marj Powner (Chair)

Friends of Carrington Moss