## **SCRUTINY COMMITTEE 13 MARCH 2024**

## CARRINGTON RELIEF ROAD - COUNCIL RESPONSE TO FRIENDS OF CARRINGTON MOSS COMMENTS

The original FOCM comments are shown in *Calibri Font* – and the corresponding Council response is in Arial font.

We would like to bring your attention to some key issues in relation to the Carrington Relief Road report that is on the agenda for 13th March.

• The report states (paragraph 2.4) that "Access travel routes are limited in the area, and hence focus on improving internal accessibility in and around the New Carrington area linking to Partington in advance of the Carrington Relief Road coming online is being developed with the current CRSTS1 funding allocation". Residents have no idea what this means, what is being proposed or what this funding is being spent on.

The CRSTS fund is the City Region Sustainable Transport Settlements – a programme of Government funding provided to Combined Authority Areas. The Intention is that a portion of Trafford's allocation, received via the GMCA will be spent on improving accessibility in and around the existing settlements of Partington and Carrington. The details of this are currently being worked up – but some of the potential measures are set out in the recently prepared strategy.

• Paragraph 4.1 of the report to the Scrutiny Committee mentions that "a Carrington Transport strategy has been prepared" but fails to mention that it has been developed without any input from the residents who will be severely impacted by its implementation (not only by what is in the "strategy" but also by what is not)! This "strategy" does not represent the priorities of local communities. We say more about this below.

The initial role of the Strategy approved by the executive is to inform the transport modelling that underpins the detailed design of the new road. it was developed in collaboration with TfGM to ensure that wider strategic objectives around modal shift (active travel and public transport primarily) would be deliverable by the scheme. This will ensure that it is fit for its intended purpose – and importantly that it is not 'over engineered'. As such the Strategy as published is a starting point and will be adapted and developed over time. However, it has not been subject of consultation because it has been prepared for a very specific technical purpose linked to the transport modelling that will govern the planned road's overall design. However it should be noted that the Strategy will be further developed through the New Carrington Master Planning Process. This master plan will identify the transport infrastructure required to support the development and will be developed with input from key stakeholders.

• Paragraph 5.5 mentions that Public Engagement will commence in January 2024. We are not aware of any consultation to date and it is now March?

The report should have been updated to reflect the fact that engagement is now scheduled for May so it will not be affected by the pre-election period. We apologise for this omission.

• Paragraph 5.9 of the report sets out a 9 year programme of spend that will not benefit the communities surrounding the area of the road. We urge Trafford to rethink their approach

and consider re-purposing this funding for initiatives that will bring real advantages to our communities.

Partington and Carrington currently is the least accessible part of Trafford. There is limited public transport and no ability to cycle or walk safely to adjacent areas of the Borough. Vehicles of all kinds continue to use an unsuitable road network, leading to congestion at peak times and a significant impact of properties adjacent to the road.

The Council is seeking to improve this position for local residents and businesses. If we want to improve bus frequency we need the highways on which those buses will run, if we want to improve walking and cycling we need to provide safe routes for people to choose active travel – and if we wish to improve the job and career prospects for local people than we need to provide the infrastructure within which business can thrive and local jobs can grow. All of these objectives are met within the Carrington Relief Road project. Doing nothing and maintaining the current status quo is neither a realistic nor desirable option for the Council.

*In relation to the Transport Strategy document itself:* 

• It is not a surprise that the "strategy" continues to promote car/HGV-dependency, leaving a legacy of huge levels of air, noise, light, vibration and water pollution (to say nothing of the carbon emissions), that will result in poorer health (and safety) outcomes for local residents and higher costs to the public purse. This focus on motor vehicle traffic is in direct contradiction to the GM Transport Strategy 2040, which aims to reduce car use to no more than 50% of daily trips by 2040 and reduce demand on road space from freight, moving freight traffic onto rail and water-based transport by the same date. The associated Transport Delivery Plan states that "The Right-Mix aim is for 50% of trips to be made by sustainable modes across GM. This will require zero net growth in motor vehicle traffic between 2017 and 2040, and non-car mode share to increase from 39% of all trips in 2017 to 50% of trips in 2040". The year 2040 is only 16 years away. Spending £76.5m (mostly public money) on such an initiative would

The Strategy has been prepared in full agreement with TFGM and is entirely aligned with Transport 2040 Strategy. The right mix objective is to be achieved across the City Region as a whole – and it is recognised that different approaches need to apply to more peripheral locations within Greater Manchester than to City Centres or main Metrolink corridors. It should be noted that the design of the road dedicates more road space to Active Travel than to motor vehicles – and so is fully reflective of the aim of delivering modal shift through improved active travel.

- HGV traffic on the A6144 is, by far, the biggest concern for residents, yet there are no figures in the "strategy" which identify the size of the issue (either now or in the future), nor does it explain how Trafford proposes to address this problem, other than suggesting that the new road will be the panacea for freight transport! Yet, we know that businesses are not in favour of restricting HGV use on the existing A6144, as was confirmed in a response to a planning application. There is no indication about how the proposed route changes will be agreed with businesses and implemented so that travel through Carrington Village can be limited to local resident movements.
- Freight Transport requires a national policy to direct the shift to more sustainable modes. For the past 80 years freight policy has largely been focussed on moving goods by road, with the corresponding decline in rail and water way freight. It will take consistent effort over many decades to change this approach – and that is beyond the ability of either Trafford Council or Greater Manchester. All that can be

done at the present time is to ensure business movements do not adversely impact other modes of transport — and by creating new fully segregated routes the planned highway should achieve this. The background facts are rather selective, there is no reference, for example, noting that Partington has a much lower rate of car ownership (27.2% of households with no cars or vans according to Census 2021) compared to the rest of Trafford (19.3%). Neither is there any mention of the likely changes arising from the increased charges on the Warburton Toll Bridge. There are no figures highlighting the difference in traffic volumes during school term times and school holidays (there is a marked variation in numbers which we have observed in our traffic counts that could be addressed through increased school bus services, cycling buses and other initiatives). Our latest traffic counts are available on our website here. They demonstrate that school traffic is a huge issue (along with HGVs) and that the introduction of school buses would be a much more cost effective solution to the current problem than spending £76.5m on constructing a new road.

It is acknowledged that schools have a big impact on traffic and movement. Consequently the opportunity via the CRSTS funding to improve accessibility within existing settlement can promote safer journeys to school via active means. The GM bus franchising process is also looking at the better coordination of buses for schools. However buses, like all vehicles, rely on roads to operate.

Because the proposed new road will be constructed adjacent to and beyond Carrington, it is more likely to induce additional traffic into Partington than to relieve traffic for residents there. Other initiatives are needed to improve transport options for Partington residents, such as free community transport and the reopening of the former railway line between Timperley and Irlam. This latter scheme would be highly beneficial to the people of Partington and would enable sustainable passenger and freight transport to be fully examined. Given the lack of consideration for this option from Trafford, Partington Parish Council has begun to explore opportunities to raise the funding needed for a feasibility study for the initiative. It should be noted that traffic from Sale West to the Carrington Spur will be significantly and negatively impacted as a consequence of the construction of the new road.

All of these initiatives are fully supported – but with the growth planned under the 2012 Core strategy and the 2024 Places for Everyone Plan some improvement of the Highway network is necessary. The new route may seem very expensive, but it is being designed to be as 'lean' as possible – it is not part of a 'big Road' mentality. The Council supports all measures to make better use of the old railway line and has already carried out feasibility work on the route. This will help inform the Carrington Greenway proposals for an active travel route along the old railway in short-medium term. However, we must recognise that re-opening lines for Heavy Rail is a very lengthy and expensive process. There is no prospect of a reopening in the medium term.

• The Transport Strategy does not include any information about the carbon implications of the proposed initiatives. There are no calculations that estimate what impact the different scenarios could have on Trafford's carbon neutral ambitions.

It was not within the remit of the strategy to look directly at Carbon – but the objective was to maximise sustainable transport objectives within the limits of current national policy and funding. Carbon emissions are central to that question of sustainability. It should be noted that whilst public transport provides much better carbon outcomes, future road transport should be almost completely de-carbonised within a few years of the road's opening.

- The document concludes (paragraph 7.7) that "peat is not considered to be a significant constraint on future infrastructure provision". This demonstrates a huge lack of understanding of the impact of hydrology on the main body of peat on Carrington Moss (335 hectares). We would remind Trafford that it is Natural England who are the experts in this matter, and their advice should be fully followed. At the P4E Examination in Public, Natural England's contributions included the following:
  - Natural England (NE) wrote to the planning inspectors in June 2023 (OD42), stating that there is extensive and restorable deep peat within allocation JPA33 (New Carrington), that the deep peat should be considered to be an irreplaceable habitat, and that "the combination of the location and the extent of development proposed by the allocation policy means the proposed development is incompatible with avoiding the deterioration of this irreplaceable habitat"
  - NE's view, set out in OD23, is that the development will not only prevent future restoration but "will cause irreversible damage to the body of peat directly under the developed land and the wider peat mass, which depends on the continuity of the flow of water". They go on to recognise that the degradation of the peat mass will also result in significant greenhouse gas emissions
  - NE confirmed (in OD42) that their position is in line with the England Peat Action Plan, that there should be no development on (restorable) deep peat, and that peat should be kept wet and in the ground. NE drew attention to their "extensive experience of peatland restoration projects" which provides considerable credibility to their professional judgement in this matter.

The Report relates to the Carrington Relief Road – ground investigation reveals there is no peat of any quantum on the line of the route. Historical mapping shows that mossland was located well to the south of the road alignment. It is completely misleading to continue to associate the Carrington Relief Road with Peat.

Peat is located elsewhere in Carrington – and Natural England's references are to those locations – and not to the planned road. PfE Policy JPA30 New Carrington, includes specific policy requirements in relation to peat which will be considered in the Masterplan and as part of future planning applications. However the location of the identified Peat lies some distance south of where the road will be built.

It seems that Trafford are wedded to the construction of a new road to the exclusion of any other transport option, including those proposed in previous local plans, such as the bridge across the Manchester Ship Canal between Carrington and Irlam (for which land was safeguarded in the 2006 UDP and it was listed as an implementation project in the 2012 Core Strategy). This initiative would reduce the number of HGVs (and other vehicles) on local roads considerably.

It would be far more cost effective for Trafford to:

- upgrade the existing road
- implement traffic calming measures to deter through traffic
- upgrade the public rights of way across Carrington Moss to encourage modal shift to walking and cycling
- increase the availability of school buses to and from the area
- introduce free community transport (particularly to Partington)
- fully explore the opportunities for more sustainable passenger and freight transport options for the area.

Most of these objectives already form part of the Carrington Relief Road project – or are a requirement of Places for Everyone Policy and will be further developed via the master plan. The Council is not wedded to just building a road – it is being conceived alongside numerous other transport interventions – and importantly is being designed to allow full safe and segregated walking and cycling. However, given both the scale of growth and the problems on the existing highway network, improving local roads must be part of the future transport mix. This was recognised back in 2012 and it still holds good today.

Upgrading the existing road was considered in the options paper – but would not have achieve the same transport benefits as the preferred alignment. Every encouragement will be given to calming the A6144 and to persuade existing businesses to take access from the new road. Following feedback from the local community £2M within the project budget is allocated for the purpose and it is hoped to attract further funding to expand the scope of this work. Bus franchising will allow for better options in future. Better freight solutions would be welcomed but the Council has to work within the framework of current national policy. There is no prospect of delivering a Bridge over the ship canal and this project was intended to compliment not replace the new Road.

If we want to improve accessibility for existing businesses and residents – and allow for future growth that the Borough needs then we need to plan sensibly for the infrastructure that will support those aims. Improving the local highway network is an essential component of that – which is why the CRR is being progressed – but the Council remains committed to bringing forward other improvements alongside this.