



2nd March 2026

Dear Development Management Team

Planning Application 118033 Carrington Relief Road

We object to this planning application for the reasons summarised below and set out in more detail in the attachment.

In relation to the Planning Balance, we believe the so-called ‘benefits’ of this scheme are significantly outweighed by the harms to be caused to local residents, to the environment and to nature’s recovery. The benefits of the scheme appear to be significantly overstated, whilst the harms are minimised or not mentioned.

In addition, the submitted application demonstrably does **not** comply with national planning policy, the adopted development plan, and other policies and it **will** result in unsustainable development. Whilst we recognise that development plans should be ‘read as a whole’, given the lack of policy compliance, we would like to clarify the status and weight of all policies in the National Planning Policy Framework (NPPF) and Places for Everyone (PfE) in local decision-making, as it seems many are considered optional.

National policy, PfE, and established best practice in strategic masterplanning all emphasise the importance of aligning development and key community uses with high-capacity public transport nodes. In the largest allocation in PfE, a more sustainable, public transport-led framework should be expected. This proposal does not deliver that vision. It dilutes and displaces public transport options in favour of retaining car/HGV dependence and dominance.

We also do not believe there has been sufficient scrutiny of Trafford’s consultation approach throughout the process (there has been no consultation about the availability of more sustainable solutions, or on the preferred route option) nor on their decision to discount more sustainable options in favour of this unsustainable solution. If this road is being advanced as the most appropriate outcome, it is incumbent on the applicant to demonstrate why alternative, more sustainable options have been dismissed.

Whilst we fully support the opening of the A1 road to general local traffic, we specifically request that the eastern part of the road is removed from the plan as it will (confirmed in the documentation) draw huge volumes of traffic from the motorways and other major roads, significantly increasing congestion and pollutions. It will impact the financial, mental and physical health of local residents, including vulnerable communities, and will cause extensive harm to natural capital resources, including populations of threatened species. We request that Trafford makes a genuine effort to create a sustainable community at New Carrington.

Furthermore, this planning application:

- does not have the support of communities (substantiated by the previous consultation, in which 77% of respondents confirmed they do not support the road scheme)
- does not provide certainty or longevity of capacity, with the documentation confirming that parts of the road/junctions will be over capacity within a very short period
- gives insufficient consideration of the impacts of induced traffic¹, leading to the absence of a Travel Plan, which should explicitly show **all** the anticipated traffic volumes, including those for HGVs (as required by planning practice guidance)

¹ <https://tapas.network/35/hopkinsongoodwin.php>

FOCM Objection to 118033 Carrington Relief Road



- will (contrary to policy) result in huge increases in air, noise, light, vibration, dust and water pollution and carbon emissions
- deliberately downgrades the area's Green Belt, through the intentional creation of Grey Belt (leading to more harmful development, more traffic, more pollution and further loss of environmentally and ecologically rich green spaces)
- provides insufficient information about the anticipated costs of the road and which organisation(s) will fund any unforeseen expenditure, at a time when the public sector is severely challenged in relation to available funding
- does not adequately consider the cumulative effects of development in New Carrington
- lacks a number of documents, including, for example, (i) the Full Business Case, which should follow Treasury Green Book² guidance and include a Natural Capital assessment (as set out in the government's Enabling a Natural Capital Approach (ENCA)³), (ii) a comprehensive risk register, (which should include all risks and issues that will affect the financial, physical and mental health of local communities, showing explicitly how such harms will be mitigated), (iii) a comprehensive list of assumptions made within the planning application (iv) a Travel Plan, as mentioned above, which should explicitly show the anticipated traffic volumes, including those for HGVs, (v) a detailed peat assessment, (vi) a compensation strategy to address the loss or deterioration of the irreplaceable habitat, as required by NPPF paragraph 193c, (vii) an assessment of the need for open space (NPPF paragraph 103), (viii) a comprehensive assessment of policy compliance.

We would ask that the benefits and harms of the scheme are fully reviewed and that communities are provided with a list of explicit and measurable benefits and comprehensive details of the harms to be caused and the mitigation to be provided. If Trafford is wedded to constructing a new road, they should at least be honest about what it will and what it will not deliver.

As Trafford considers a response from the Friends of Carrington Moss to come from just one household (confirmed in the response to our complaint about the handing of the BESS planning application, 115160), we have asked our supporters to submit a summarised version of this objection, along with their own comments. Some have used a template, whilst others have submitted representations directly to the planning portal. Each of these should be considered a separate objection.

We would like to take this opportunity to thank Trafford and the consultants involved in the preparation of the documentation for their consideration of our comments made in response to the Scoping Report. This is appreciated.

We would also like to thank the Trafford and Amey teams for their time during the period when the planning application documentation was being prepared. Whilst there was no engagement with communities during the formative years of this scheme, particularly in relation to whether a road was the best solution, there has been a significant improvement in engagement in the recent period, albeit too late for communities to influence the solution now being proposed.

Kind regards

Marj Powner (Chair), Friends of Carrington Moss

² https://assets.publishing.service.gov.uk/media/6645c709bd01f5ed32793cbc/Green_Book_2022_updated_links_.pdf

³ <https://www.gov.uk/guidance/enabling-a-natural-capital-approach-enca>



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Planning Balance

Given that there are national, regional and local policy requirements aimed at reducing car dependency, promoting and enhancing sustainable transport options to facilitate sustainable development, improved air quality, a radical reduction in carbon emissions, and zero road deaths/serious injuries by 2040⁴, along with evidence of a lack of car ownership in Partington and Sale West, and existing health issues in those deprived communities, Trafford should have been focusing on the sustainable passenger and freight transport options set out in the Core Strategy 2012 (and the UDP 2006).

The Planning Statement (document 1535827) confirms (paragraph 10.3) that this road will act as “*the catalyst for planned future regeneration within the locality proposed under the wider New Carrington masterplan area*”, indisputably establishing that the proposed New Carrington Masterplan is centred around an unsustainable road scheme, rather than transit-oriented development and a sustainable transport hub.

The proposal also fails to demonstrate how car/HGV use will be minimised or strategically managed. Movement will not be structured around sustainable nodes, and the scheme does not represent a genuinely transit-oriented response within a Strategic Allocation.

There are less expensive, less environmentally harmful options that could be considered by Trafford and there should be a serious examination of the Council’s enduring failure to consider all the strategic options to alleviate traffic congestion in this area, some of which were highlighted in their own previous development plans (such as the bridge across the Ship Canal, reopening the former railway line and implementing significant improvements in sustainable passenger and freight transport options).

The Planning Balance argument for the scheme is set out in the Planning Statement (document 1535827), which summarises the benefits and harms as follows:

Benefit/Harm	FOCM Commentary
<p>Conformity with Development Plan Policy, including Planning Practice Guidance, to meet economic, social and environmental policy requirements</p> <p>Paragraph 9.19 suggests that, in facilitating the delivery of the housing and employment set out in PfE, the scheme aligns with paragraph 85 of the NPPF, creating the conditions in which businesses can invest, expand and adapt and that, as a consequence, the Proposed Development is considered to align in full with the NPPF’s economic, and spatial planning objectives, which attracts substantial positive weight in the planning balance.</p>	<p>We set out below the many areas of non-compliance with national, regional and local development plan policy requirements. Many of these are not acknowledged within this document nor within the planning application as a whole.</p> <p>Best practice is not followed, avoidance of harm is not prioritised, and sustainable development will not be achieved.</p> <p>In addition, specific PPG guidance related to an explicit traffic count for HGVs is not provided within this application.</p> <p>Furthermore, the alternative option would also facilitate the creation of conditions in which businesses can invest and which fully complies with the concept of sustainable development.</p> <p>The scheme also does not comply with the aims of the GM Transport Strategy 2040.</p> <p>Whilst we recognise that the CRR is explicitly mentioned in PfE, lack of compliance with policy should be considered to attract substantial negative weight in the planning balance.</p>

⁴ <https://www.greatermanchester-ca.gov.uk/media/nxxlv5hv/vision-zero-gm-action-plan.pdf>



Benefit/Harm	FOCM Commentary
<p>Green Belt Harm</p> <p>Paragraph 9.3 acknowledges the eastern part of the CRR “<i>constitutes inappropriate development within the Green Belt</i>”</p>	<p>The planning application does not reference the government’s Grey Belt policy, which would be applied to the Green Belt land if the eastern part of the scheme is approved. This is harm that cannot be mitigated by any of the supposed ‘Very Special Circumstances’ and should attract substantial negative weight in the planning balance.</p>
<p>Harm to Designated and Non-Designated Heritage Assets</p> <p>Paragraphs 9.6 and 9.8 suggest that this harm should be afforded limited negative weight in the planning balance.</p>	<p>The volume of traffic that has been excluded from the Transport Assessments means that the associated risks and issues set out in the various paragraphs of the Environmental Statement have been understated. The harms to these heritage assets should be reassessed on the basis of more accurate traffic and pollution impacts.</p>
<p>Improvements to Active Travel</p> <p>The application suggests this should be afforded substantial positive weight in the planning balance.</p> <p>In addition, Paragraph 9.13 states that the scheme will address issues of road safety for active travel users, see below, and suggests this should be afforded moderate positive weight in the planning balance.</p>	<p>For the eastern part of the scheme, the existing extensive active travel features have been belittled and considerably undervalued.</p> <p>This scheme will fracture existing routes and enhanced connectivity to wider networks could be provided with the alternative option.</p> <p>Walking and cycling adjacent to huge numbers of highly polluting vehicles will NOT be safe, pleasant or healthy.</p> <p>Given the over 1,000 horses stabled on and around Carrington Moss, facilities for horse riders should have been given more prominence.</p> <p>Furthermore, as the existing A6144 between Isherwood Road and Banky Lane will not be closed to traffic, this road does not represent a community benefit for active travel users.</p> <p>Active travel should, therefore, be afforded limited positive weight in the planning balance.</p> <p>Road safety for cyclists on the eastern part of the scheme should be afforded limited positive weight in the planning balance</p>
<p>Congestion on the Existing Road</p> <p>The application suggests this should be awarded moderate positive weight in the planning balance.</p>	<p>The A6144 is congested during rush hour periods, just like almost every other road in the country. It is not congested at other times unless there is a traffic incident.</p> <p>Given that the new road proposes to cause a rat-run between motorways by inducing traffic from the M60, the M6, the M56, the A56 and other parts of the road network, to travel through villages on the east and west-bound A6144, outside of the scheme boundary, congestion will increase because of this road. This would not happen with the alternative option.</p>



Benefit/Harm	FOCM Commentary
	<p>As some junctions will be at or near capacity within 15 years, this should be awarded substantial negative weight in the planning balance.</p>
<p>Alternative to the A6144 Paragraph 9.11 suggests that the CRR will serve as a vital alternative to the heavily congested A6144, which currently acts as the only major route through the area. This should be afforded moderate positive weight in the planning balance.</p>	<p>The only part of the scheme that is “<i>the only major route through the area</i>” is Carrington Village. This issue is addressed by opening up the A1 road to general traffic. In relation to the eastern part of the scheme, traffic can travel via Flixton and Urmston to the motorways and beyond if needed (for completeness, from Partington, traffic can travel through Warburton and across Warburton Bridge).</p> <p>It is, therefore, incorrect to suggest that the eastern part of the scheme will serve as a vital alternative to the A6144 and, given alternatives have not been comprehensively explored, this should be afforded substantial negative weight in the planning balance.</p>
<p>Road Safety The application suggests this should be awarded moderate positive weight in the planning balance.</p>	<p>The road will not improve road safety. No consideration has been given to the current wildlife corridor and the impact of large mammals straying onto the road. Gaps in fences are proposed, which could be dangerous for walkers, cyclists and horses and their riders (especially young people).</p> <p>No consideration has been given to the hazardous materials that will be carried by many of the HGVs.</p> <p>The speed on the eastern part of the road is proposed to be 40mph, which is likely to be exceeded by drivers, particularly at night.</p> <p>Through traffic and HGVs are not diverted away from pedestrian areas (except potentially for Carrington Village), houses near to Isherwood Road and Banky Lane will be significantly impacted by traffic numbers and excessive harmful pollution.</p> <p>This should, therefore, be afforded substantial negative weight in the planning balance</p>
<p>Carrington and Partington Regeneration, via housing and employment development and growth</p>	<p>The 2006 UDP and the 2012 Core Strategy both highlighted the importance of improved public transport to facilitate the regeneration of Carrington and Partington.</p>



Benefit/Harm	FOCM Commentary
<p>Paragraph 9.14 suggests the CRR is identified as a key piece of transportation infrastructure across multiple planning frameworks. Therefore, this attracts substantial positive weight in the planning balance.</p> <p>Paragraph 9.15 refers to the New Carrington allocation which accounts for approximately 30% of the new homes planned in Trafford. The paragraph suggests delivery of these houses is dependent on improving connectivity and accessibility to the Site. This should be awarded substantial positive weight in the planning balance.</p>	<p>The alternative option would enable more funding to be provided for public transport services, more quickly, which would improve connectivity and accessibility for new housing and employment sites, as well as existing communities, including those who do not have access to a car.</p> <p>The current lack of a public transport hub at New Carrington means that what is being promoted is car/HGV dependent and dominated development.</p> <p>Regeneration and growth is not predicated on the CRR, this unsustainable transport solution, that will not achieve its stated benefits and only provides limited connectivity and accessibility should attract limited positive weight in the planning balance.</p>
<p>Deprived Communities</p> <p>Paragraph 9.16 suggests that the Proposed Development will result in an increase in employment in the local area and that this attracts moderate positive weight in the planning balance.</p>	<p>The proposed development only provides the potential of temporary employment and then only limited opportunities, if local people have the skills and experiences necessary.</p> <p>In referring to the deprivation in local communities, the Planning Statement has not considered the financial, physical and mental health impacts on residents as a result of the huge increases in air, noise, light, vibration, dust and water pollution, and the increased risk of flooding, particularly for those living in Sale West. Nor has it considered the need for such communities to be able to access green spaces.</p> <p>Furthermore, car ownership in the overall Ward statistics does not reflect that around 40% of those affected in Partington and Sale West do not have access to a car. The road will, therefore, bring them no benefits but all the health risks mentioned above.</p> <p>This should attract limited positive weight in the planning balance.</p>
<p>Economic Benefits</p> <p>Paragraph 9.17 suggests training opportunities during construction could generate £82.7 million and that this attracts substantial positive weight in the planning balance.</p> <p>Paragraph 9.18 suggests the scheme will seek to maximise opportunities for local employment and training and should attract moderate positive weight in the planning balance.</p>	<p>The economic benefits are based on flawed data as there is no consideration of the Natural Capital and Ecosystem Services value of the environmental assets to be harmed nor the impact on the Rural Economy.</p> <p>This should attract substantial negative weight in the planning balance.</p> <p>Many employment opportunities may only be granted to selected individuals with appropriate skills and experiences.</p>



Benefit/Harm	FOCM Commentary
<p>Paragraph 9.23 acknowledges that the scheme will result in the permanent loss of agricultural land which should be afforded moderate negative weight in the planning balance.</p>	<p>This would, therefore, attract limited positive weight in the planning balance.</p> <p>The permanent loss of productive Grade 2 agricultural land should, in the context of sustainable development, be afforded a substantial negative weight in the planning balance.</p>
<p>Environmental and Ecological Harms</p> <p>Whilst paragraph 9.21 acknowledges that the scheme will introduce some adverse effects on the local landscape and visual amenity, which should be afforded limited negative weight in the planning balance, paragraph 9.24 suggests there are environmental benefits which should be afforded substantial positive weight.</p> <p>Furthermore, paragraph 9.25 suggests that the scheme makes an important contribution towards the enhancement of both green and blue infrastructure and that these should be awarded moderate positive weight in the planning balance. This is an astounding assessment given the huge levels of harm to natural capital assets and to species populations.</p> <p>Paragraph 9.26 refers to the level of BNG and suggests this should be awarded substantial positive weight in the planning balance.</p> <p>Paragraph 9.27 sets out the proposed mitigation plans to compensate for the environmental and ecological harms caused by the scheme and suggests that these should be awarded moderate positive weight in the planning balance.</p> <p>Paragraph 9.22 identifies that the development is likely to have an adverse impact on landfill capacity, which should be given limited negative weight in the planning balance.</p>	<p>There will be huge environmental and ecological impacts as a direct consequence of this scheme. These will affect both human and wildlife species and local conservation areas.</p> <p>The lack of genuine consideration of the alternative option, including the complete disregard of Natural England advice, has resulted no avoidance of harms and very minimal mitigation.</p> <p>The harms will be caused immediately but mitigation will not be in place for many years, meaning that habitats and species populations will decline dramatically and may never recover.</p> <p>The environmental impacts, including air, noise, light, vibration, dust and water pollution and increased flood risk have been inadequately assessed due to the explicit exclusions in the flawed transport assessment.</p> <p>In terms of landscape, whilst acknowledging that improvements will only happen 'over time', the document does not consider the impact on Sale West residents at all.</p> <p>Landscape proposals should be afforded substantial negative weight in the planning balance.</p> <p>We disagree that there are environmental benefits in relation to the eastern part of the scheme. The environmental and ecological impact should, therefore, be afforded substantial negative weight in the planning balance.</p> <p>We disagree that there are ecological enhancements that could not be delivered by the alternative option. These should, in the context of the harms to be caused, be awarded moderate negative weight in the planning balance.</p> <p>As we set out below, the BNG scheme should be fully reviewed before awarding it substantial positive weight in the planning balance.</p>



Benefit/Harm	FOCM Commentary
	<p>We are also concerned about the positioning of, for example, the Skylark mitigation areas (between two major roads), and have huge concerns about the resources available to manage and monitor the supposed mitigation plans related to the environmental and ecological issues.</p>
<p>Consultation</p> <p>There is no reference to consultation in the planning balance.</p>	<p>There has been no consultation with communities about whether more sustainable transport options should be considered. There was no consultation with communities about the road route options. Feedback from community groups and Natural England in relation to the preferred options was disregarded.</p> <p>Almost 77% of respondents to the 2025 consultation confirmed that they did not support the Carrington Relief Road.</p> <p>This should, therefore, be afforded substantial negative weight in the planning balance.</p>
<p>Public Transport Benefits</p> <p>There is no mention in the planning balance section</p>	<p>Given local, regional and nation policy requirements promote the importance of sustainable transport options, the focus for transport investment and the transport core of the New Carrington Masterplan, should be a hub and improved passenger services. This is lacking and should be given a substantial negative weight in the planning balance.</p>
<p>Transport Assessment</p>	<p>The Transport Assessment relies on very out of date information (2014), evidence from a previous planning application and uses data attributable to sites elsewhere in the Country that have rail access and are, therefore, not comparable to this scheme. It also explicitly excludes traffic data that is anticipated should the road be approved.</p> <p>The Transport Assessment should, therefore, be given a substantial negative weight in the planning balance.</p>
<p>Public Benefits</p> <p>There is little reference to which communities will actually benefit from the scheme.</p> <p>This should be clearly set out in the documentation.</p>	<p>Whilst it is possible Carrington Village may see a reduction in traffic; this is, as yet, unproven. Those travelling from the Partington direction, including through traffic, will need to turn right at the A1 route. If traffic is queuing, many drivers will continue through the village. There is also no guarantee that HGVs will not use the route through the village.</p>



Benefit/Harm	FOCM Commentary
	<p>Other Carrington residents, particularly those who live near Isherwood Road will be significantly impacted by traffic volumes and pollutions, as will those who live near Banky Lane.</p> <p>Whilst the Transport Assessment has excluded much of the anticipated traffic from the data, the documents still anticipate huge increases in traffic through Partington, Warburton, Sale West and Ashton on Mersey. This will cause increased congestion, pollutions and traffic incidents.</p> <p>As the CRR appears to provide more benefits to those travelling between motorways than to local residents, this should be given a substantial negative weight in the planning balance.</p>
<p>Full Business Case</p> <p>No Full Business Case has been provided within the planning application documentation.</p>	<p>There is tension between the plan to deliver an unsustainable road scheme, with a potentially very poor business case, and the policy requirements to deliver sustainable communities, climate mitigation and to support nature’s recovery. This should be given substantial negative weight in the planning decision.</p>

Very Special Circumstances

In addition, the document summarises (paragraph 9.4) the supposed ‘Very Special Circumstances’ which are believed to outweigh the harms caused by the road. We comment on each of these in the table below and provide our evidence in the sections that follow.

Special Circumstance	FOCM Commentary
<p>Strategic Policy Support</p> <p>The Proposed Development demonstrates consistency with Local Plan Objectives, national transport strategies, or infrastructure delivery plans.</p>	<p>We set out below many areas of non-compliance with national, regional and local development plan policy requirements. Many of these are not acknowledged within this document nor within the planning application as a whole.</p>
<p>Transport necessity</p> <p>The Proposed Development is essential to meet identified local or strategic transport needs, with no reasonable alternative outside the Green Belt. The essential need for this strategic infrastructure whose delivery is necessary to unlock Policy JP Allocation 30: New Carrington</p>	<p>By “strategic transport needs” does that mean reducing traffic on motorways and other major roads and drawing it through villages, as proposed by this scheme?</p> <p>Given 5,000 homes and 350,000 m² employment space, the New Carrington Masterplan should be focused on sustainable transit oriented development, with a sustainable transport hub at its core.</p> <p>This proposal continues the current car/HGV dependent and dominated development in this area.</p>



Special Circumstance	FOCM Commentary
<p>Lack of alternative sites</p> <p>There are no alternative sites that lie outside of the Green Belt</p>	<p>There are reasonable alternatives which lie outside the Green Belt. Over the past 10 years, Trafford should have been looking at sustainable passenger and freight transport options, to align with national and regional policies, the 2006 UDP and the 2012 Core Strategy.</p> <p>These more sustainable alternatives should now be included in the GM Transport Strategy 2050 and Trafford’s Local Plan.</p> <p>There is also an alternative road option, which would see the A1 route opened as in this scheme, but with traffic then directed along the existing A6144 between Isherwood Road and Banky Lane. Natural England considers this option to be less environmentally harmful than the current proposal.</p> <p>The alternative proposal would also see the existing active travel routes across Carrington Moss upgraded to support and encourage modal shift.</p>
<p>Public safety improvements</p> <p>The Proposed Development reduces accidents, congestion, or unsafe conditions, delivering clear community benefits.</p>	<p>As highlighted above, this proposal increases public safety issues and unsafe conditions, particularly for active travel users.</p> <p>It also increases the financial, mental and physical health risks for communities.</p>
<p>Connectivity and accessibility</p> <p>The Proposed Development provides vital links between communities, employment areas, or key services.</p>	<p>The scheme provides limited connectivity and accessibility, servicing those who have access to a car or those who are prepared to walk, cycle or horse ride adjacent to huge volumes of highly polluting traffic.</p> <p>The large proportion (around 40%) of residents in the deprived communities of Partington and Sale West who do not have access to a car in their household will not benefit from this scheme.</p>
<p>Economic growth</p> <p>The Proposed Development supports local businesses, freight movement, or wider regional development objectives.</p>	<p>The alternative option would also support these objectives and would not have a detrimental impact on the Rural Economy, or the economic value of natural capital assets.</p>



Special Circumstance	FOCM Commentary
<p>Environmental mitigation</p> <p>The Proposed Development includes measures such as habitat creation, landscape screening, or air quality improvements that offset harm alongside improvements to surface water drainage and the creation of Biodiversity Net Gain.</p>	<p>The scheme does not avoid harms (as required by policy), the mitigation measures are minimal and do not neutralise the huge levels of harm to be caused to the health and wellbeing of both human and wildlife species. The natural capital losses will be incurred immediately, whereas the mitigation proposals will take decades to mature, by which time species decline will be permanent.</p>

The assertion (Planning Statement, document 1535827, paragraph 10.5) that the scheme is expected to contribute to sustainable development is not credible, given the significant harms to be caused to the environment, ecology, and the financial, mental and physical health and wellbeing of communities, alongside the lack of delivery of sustainable transport and a sustainable transport hub.

With the above in mind, we disagree with the Conclusion to the Planning Balance (paragraph 9.28) and we do not believe the test of ‘Very Special Circumstances’ has been met.

Furthermore, whilst the development plan should be ‘read as a whole’, weight should be attributed on the basis of explicit evidence, along with justified, well-documented (explained) assumptions. We recognise that the Carrington Relief Road is specifically mentioned in PfE policy JPA30 (criterion 13), however, reliance solely on that one criterion is insufficient to demonstrate overall development plan conformity. The decision-maker must be satisfied that the proposal complies with the development plan in its entirety, not only with the policy wording in that criterion.

In the absence of a comprehensive assessment of policy compliance, it cannot presently be concluded that the proposal accords with the development plan when read as a whole. It is, therefore, appropriate to consider whether the current proposal has been derived from a transparent and policy-led appraisal, aligned with national, regional and local objectives and policies. We highlight a number of areas of non-compliance with policy in the sections below.

Scheme Objectives

We have major concerns about the achievability of the scheme objectives, which are set out in a number of documents. In the Planning Statement (document 1535827), for example, (in paragraphs 1.4 and 4.4, which are worded slightly differently).

Objective	Concerns
<p>Provide essential highway capacity and connectivity in the transport network to deliver growth in housing and employment</p>	<p>The alternative option would meet this objective in a policy compliant way and without harming communities or natural capital assets.</p>
<p>Improve journey times and journey time reliability to support improved public transport services</p>	<p>There are no committed and funded improved public transport services</p> <p>The road represents a very short section of any trip, so will be unable to improve journey times and journey time reliability.</p>



Objective	Concerns
Reduce traffic on the A6144, particularly HGVs, by providing through traffic with an alternative route	Businesses have already stated that they wish to continue to use the A6144, only Carrington Village will possibly see a reduction in traffic (the rest of the A6144 will see huge increases in traffic). HGV traffic will increase significantly due to the proposed developments.
Allow speed and road safety measures to be introduced through Carrington Village	Very misleading. Those speed and road safety measures through Carrington Village are not provided by this scheme.
Provide improved infrastructure and environmental improvements to encourage active travel, including walking, cycling, wheeling and horse riding	<p>The existing active travel routes on and across Carrington Moss would be much more healthy, safe and pleasant to use than walking, cycling or horse riding next to huge volumes of traffic, pollution and potential collisions. Active travel users will still face issues on the rest of the (east or west-bound) A6144.</p> <p>The road will fracture existing routes and will discourage new and existing users.</p> <p>Environmental mitigations are minimal, do not provided the enhancements needed and will be established years after the harms are initiated (meaning that species populations will drastically decline and may never recover).</p>
Improve connectivity to Partington where public transport and active travel links are poor	<p>Very misleading. Public transport improvements, for example, are not provided by this scheme.</p> <p>It will not improve connectivity for the around 40% of Partington residents who do not have access to a car!</p>
Create a spine route with better connectivity options for additional road, active travel and bus facilities, when the New Carrington housing and employment sites come forward.	The scheme results in car/HGV dependent and dominated development. The spine for a sustainable community/allocation, especially one of this size, should be a public transport hub.

We believe the decision-maker should request transparent evidence that the aims of the scheme and the anticipated strategic outcomes will actually be met.

With the above in mind, including our concerns about the lack of genuine consideration of the alternative proposals, that the benefits of this scheme are significantly overstated, with its harms substantially understated, we respectfully request that the Council does not support this full planning application.



Non Compliance with Development Plan Policy

The priority for the proposal should be to demonstrably secure the outcomes required by the adopted development plan and other policies. NPPF, paragraph 7, for example, suggests that the purpose of the planning system is to contribute to the achievement of sustainable development and goes on to assert that, at a very high level, *“the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”*.

We do not believe that this scheme meets that objective. It will not result in the creation of sustainable communities. It will also harm natural capital assets and ecosystem services that are relied on by current communities and that harm will prevent future generations from meeting their own needs.

National Planning Policy Framework (NPPF)

The Transport Assessment Report (document 1537381) suggests (paragraph 8.1.2) that the *“proposed scheme aligns closely with national policy objectives, particularly those outline [sic] in the National Planning Policy Framework (NPPF) [sic] and the Planning Practice Guidance (PPG)”*. As explained in the following paragraphs, this is incorrect.

The paragraph continues that the *“NPPF [sic] and PPG emphasises the importance of sustainable development, promoting sustainable transport, and protecting the natural and historic environment”*. This scheme does not deliver those aims.

Given the level of non-compliance with policy, as set out in the paragraphs below, the application should be refused.

Promoting Sustainable Transport

The NPPF is increasingly emphasising the importance of sustainable outcomes for development. Compliance with NPPF Chapter 9 (Promoting Sustainable Transport) is obviously key to this planning application. Paragraph 109 connects the importance of a vision-led approach to sustainable transport solutions. We do not believe the application complies with this policy as, among other issues, there is insufficient consideration of the potential to avoid adverse effects (109f) within both the vision and the proposed solution.

The transport vision for New Carrington and this solution cannot be considered sustainable because:

- it continues to promote the car/HGV-dependent and dominated transport landscape, meaning that New Carrington will not become a sustainable community
- the project will not meet its own stated aims, it will not, for example, improve journey times or journey time reliability due to the acknowledged increases in traffic on the CRR and other local roads, including the east and west-bound A6144 (as shown in figures 6.1 and 6.2 of the Transport Assessment Report), with benefits accruing to the motorways and other major roads from which induced traffic will be drawn
- maximum road/junction capacity is reached within a very short period (certainly within 15 years)
- the application does not acknowledge that the road ‘generates’ additional traffic, despite significant research (including for the government’s Department of Transport⁵) confirming that new road capacity **does** generate additional journeys

⁵ <https://assets.publishing.service.gov.uk/media/5c0e5848e5274a0bf3cbe124/latest-evidence-on-induced-travel-demand-and-evidence-review.pdf>

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- it does not consider more sustainable transport options, such as reopening the former railway line (which residents have been requesting for the past nearly 10 years and which is **STILL** not included in regional or local plan policy), which, unlike the proposed solution, would actually improve connectivity for local residents
- there is no committed funding for public transport improvements, only investment in this additional road capacity
- it will inflate the costs of the public purse due to the increased frequency of health episodes (caused by both pollutions and collisions, the latter typically requiring access to police and fire resources as well as health services) and will create significant risks to the financial, mental and physical health of local residents (due to pollutions, flooding and the risks of harm from vehicles carrying hazardous materials)
- it will permanently harm 28 hectares of productive Grade 2 agricultural land which is needed for future food security (and will impact a further 12 hectares)
- it will also see the loss of land that currently captures and stores huge amounts of surface water, protecting local homes from flood risk (the loss of that land and the cumulative impact of developments proposed in the area adjacent to Sale West will drastically increase the risk of future flooding, as set out below)
- it will impact the breeding and feeding grounds of numerous red listed birds, including significant populations of skylark, for which proposed mitigation is minimal
- it will result in the felling of almost 700 trees, and does not appear to comply with the PfE policy to replace them on a 2:1 basis
- the hydrology changes caused by the road will severely impact a 335 hectare peat moss (considered to be a restorable irreplaceable habitat by Natural England).

The requirements set out in NPPF paragraph 110 are also not met. This policy highlights that significant development should be focused on locations “*which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*”.

Trafford has repeatedly acknowledged that the New Carrington area is not currently a ‘sustainable’ location. Bus services have been radically depleted over the past decade.

Trafford has approved businesses which have substantially increased the amount of HGV traffic in the area. Yet, despite more sustainable rail and water-based transport options being promoted in the 2006 UDP and the 2012 Core Strategy (alongside a bridge to take traffic away from Carrington across the Manchester Ship Canal), in more recent years, Trafford has **only** considered the developer-led option of a new road. Another road does not offer ‘genuine choice of transport modes’, it merely continues to promote car/HGV dependency and dominance, when more sustainable alternatives could be available.

In addition, there are already numerous active travel routes across Carrington Moss, including those that run in parallel to the existing road. These routes could be upgraded for a fraction of the (financial and environmental) costs of building a new road. This would leave funding available to rapidly improve bus services in the area. The existing active travel routes do not suffer from pollutants, they are safe, healthy and pleasant to use and, once upgraded, are far more likely to encourage new walkers and cyclists than a more dangerous, unhealthy, route, that will see active travel users adjacent to thousands of highly polluting vehicles, breathing in significant levels of PM_{2.5}, and also affected by noise, dust and potential collisions.

It is also clear that NPPF paragraph 118 has not been complied with. The documents in the planning application repeatedly state that the road itself will not generate traffic flows and uses this as the reason why a Travel Plan has not been created (Transport Assessment Report 15357381 paragraph 1.3.2).

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This flawed assessment is astounding as the phenomenon of induced traffic has now been recognised as an outcome of additional road capacity for decades and it is clear that the road **WILL** generate additional local and longer journeys.

In the SACTRA (1994)⁶ report, for example, induced traffic was defined as “*the increment in new vehicle traffic that would not have occurred without the improvement of the network capacity*”. In 2018, WSP’s Evidence Review for the Department of Transport, mentioned above, highlights that “*In cases where network improvements stimulates additional traffic and this additional traffic affects travel conditions, partially re-congesting the network, failure to allow for induced traffic may lead to an overestimate of the user benefits of schemes. Therefore, unless induced traffic is correctly taken account of, significant errors in benefit estimation can be made*”.

We believe that this scheme has failed to allow for the anticipated induced traffic and that there are errors in benefit estimation along with a significant underestimate of the associated impacts on both human and wildlife communities, including in relation to the financial, mental and physical health effects of air, noise, light, vibration, dust and water pollution (and carbon emissions).

Induced traffic will take many forms, including, for example:

- the through traffic that will see the route as an attractive alternative to other options, as demonstrated in the Transport Assessment Report 15357381 figures 6.1 and 6.2, which shows traffic being “*drawn from*” the M60, down the Carrington Spur and onto the Carrington Relief Road (CRR), along with traffic also reducing on Cross Street in Sale and other local roads, with traffic increases also coming in the other direction, being “*drawn from the M6, along the CRR and onto Junction 8 of the M60*”, causing a reduction in traffic using the M56 towards the M60 (see paragraphs 6.23 to 6.26)
- traffic generated by new developments which can only be approved once new transport options are available – this is where the lack of consideration of more sustainable transport options within the transport vision is most obvious – all new developments will be car/HGV-dependent and dominated as Trafford is not even planning for more sustainable options in either the draft Local Plan or the TfGM Transport Strategy 2050
- additional journeys specifically generated because of the additional road capacity – these are journeys that would not be made via road transport if that additional capacity was not available – these journeys will be generated by those who live outside the area, who perhaps decide that the CRR is now a more convenient option than using their current mode of transportation (which may be bus or rail, for example) and additional journeys will also be generated by local residents, given the lack of alternative sustainable transport options.

It is, therefore, totally incorrect to assert that this road does not ‘generate’ additional traffic and it is astounding that Trafford Council’s Strategic Planning and Growth team, Transport for Greater Manchester and National Highways have all accepted this assertion given the amount of evidence available that it will.

The SACTRA report, mentioned above, concluded that “*An average road improvement, for which traffic growth due to all other factors is forecast correctly, will see an additional 10% of base traffic in the short term and 20% in the long term*”. A similar estimate of these additional journeys should be included in a Travel Plan and we believe these numbers **are** significant.

⁶ The Standing Advisory Committee on Trunk Roads Assessment (1994) [Trunk Roads and the Generation of Traffic. Report for DfT, Chairman Mr D A Wood, QC, December 1994](#)

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Planning Practice Guidance⁷ explicitly requires transport evidence bases to provide a classified count (identifying all vehicle types separately), where there is known to be a significant level of heavy goods vehicles traffic, as part of the assessment of the capacity of the road network. We can find no documentation that highlights the anticipated volume of HGV traffic on this new road. This is important as a large number of HGVs travelling in the area will be carrying hazardous materials and they are likely to take longer to transition to lower-emission vehicles than car traffic.

Despite the number of HGVs that will use this route, and the lack of current amenities, there is nothing in the proposal about the provision of “adequate overnight lorry parking facilities” (NPPF paragraph 114). This is also a requirement of Places for Everyone policy Policy JP-C7, criterion 5.

Traffic and transport related issues are discussed further below.

Safety Issues

Finally, in relation to NPPF Chapter 9, we believe there is justification to refuse this planning application on the grounds of “an unacceptable impact on highway safety” (paragraph 116), which cannot be mitigated.

Amey’s CRR Topic presentation⁸ highlights (at 40:22) that, having analysed the number of personal injury accidents (PIAs) between the M60 junction 8 and Partington, over a 5 year period (2020-24 inclusive), 25 PIAs were recorded, none of them fatal. Amey went on to say that, for the current traffic flow, the calculated annual link and junction combined accident rate is less than expected for typical roads of this type. In fact, the analysis shows that the existing road is significantly safer than other similar single carriageway roads in the UK, where Amey suggests you’d expect 29 personal injury accidents per annum (and only 5 per annum were recorded on the A6144 here).

Whilst Amey previously confirmed that the accident record on the existing local road is much better than would typically be expected, the information included within this planning application does not appear to concur. To facilitate this, the Transport Assessment (document 1537381) seems to consider collisions that are outside of the jurisdiction of the scheme and the Planning Statement (document 1535827) interprets this data selectively!

The Planning Statement suggests (paragraph 7.99) that “increased capacity and improve [sic] infrastructure will reduce accidents, congestion, and remove unsafe conditions which is a clear community benefit”. This is incorrect. As confirmed in that same paragraph, the proposed development covers just 2.7 miles of road and active travel provision. This is a very small part of any journey to and from the area and the documentation confirms that active travel routes beyond the red line boundary will not be improved by the scheme. The additional induced traffic travelling along the east and west-bound A6144 will increase the risks for both active travel users and others. This road will, therefore, result in an increase in unsafe conditions, rather than a decrease.

We note that Planning Statement, paragraph 7.79 uses the word ‘could’. We think this is highly aspirational. Vehicles will be travelling at higher speeds than on the existing road when approaching the limited number of junctions and crossings. There are also planned gaps in fencing to facilitate crossing but without appropriate safety measures. We believe there will be a significant increase in road traffic incidents, including collisions with wildlife (endangered nocturnal creatures, deer, foxes and other animals that currently use the wildlife corridors), horses, dogs and, potentially pedestrians.

⁷ <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>

⁸ <https://www.youtube.com/watch?v=L3uG5SzmzjA>

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We are extremely surprised that ES Chapter 14 (Socio Economic and Human Health, document 1538080) does not make any reference to the presence of hazardous substances both travelling along the proposed route and in the area adjacent to the road. The risk of incidents will increase if the road scheme is approved due to the huge levels of additional traffic using what is now a private road. In addition, many of the HGVs will be carrying hazardous materials and any accidents involving such vehicles could result in harmful road run-off, increasing contamination, including in the proposed attenuation ponds and the mitigation areas.

COMAH zones do not appear to have been considered in the calculations of sensitivity of receptors. There is no mention of how, with such increased traffic volumes, and the resulting congestion, vehicles will be evacuated in an emergency, nor how users will be notified if there is a health incident.

Safety issues will also impact landowners in the area, as highlighted in ES Chapter 13 Agricultural Land (document 1538112), which confirms (paragraphs 13.8.13 and 13.8.15) that the scheme will create the potential for increased vandalism, increased risk of theft or damage to farm machinery and assets, increased instances of trespass, with people taking shortcuts due to restrictions caused by the new road. This not only compromises biosecurity and crop integrity but also raises safety concerns for both the public and farm operations.

Whilst they would benefit from upgrading, the current active travel routes across Carrington Moss are very safe, very healthy and very pleasant to use (unlike walking, cycling or horse riding adjacent to huge volumes of traffic and breathing in the associated pollution).

With all the above in mind, we totally disagree with the conclusion (Planning Statement, document 1535827, paragraph 7.108) that “*public safety constitutes a Very Special Circumstances, as set out in paragraph 153 of the NPPF*”.

Greenhouse Gases

Moving on to the policies in Chapter 14, ‘Meeting the challenge of climate change, flooding and coastal change’, these should also be considered key in decision making in relation to this road scheme.

The expected radical reductions in greenhouse gas emissions (as set out in NPPF paragraph 161 and also highlighted in paragraph 164) will not be delivered. In fact, this road will result in a significant increase in carbon emissions.

Despite Trafford’s declaration of a climate emergency in 2018, their carbon neutral action plan (2020) and the GM 2038 carbon neutral target, the assessment of the impact of carbon emissions is, inappropriately, only measured against national objectives.

As an unsustainable road scheme, which increases carbon emissions, the CRR meets the definition of major adverse effects (Table 16-2, document 1545732, ES Chapter 16 Climate Updated) because it continues to promote car/HGV dependent and dominated development, contrary to local, regional and national policy.

The information set out in the ES Non-Technical Summary (document 1538053) confirms (paragraph 4.14.7) that the operational emissions over a 60 year period are, unsurprisingly, “*dominated by road user activity (99%)*”.

Whilst we believe the figures are drastically underestimated, due to the flawed traffic volumes assessment, a net increase of 46,649 tCO₂e and 29,134 tCO₂e (for 2030 and 2045 respectively) should be judged to be significant in terms of Trafford’s ability to meet its own climate ambitions and to support the regional carbon neutral goal.

The reduction in 2045 reflects the future uptake of electric vehicles. We are concerned that these figures do not represent an accurate estimate and should be challenged, due to:

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- the high proportion of HGVs (which will not move to EVs as quickly as cars) using the route
- the number of trips that have not been included because the scheme is predicated on the road not 'generating' traffic
- the number of trips that have been explicitly excluded from the traffic numbers, as mentioned below, but which are anticipated if the road is approved
- the number of additional trips from new development (including that enabled by the intentional downgrading of Green Belt land to Grey Belt).

With the above in mind, we believe the figures do not represent an accurate estimate of the carbon impact of the scheme.

There should also be clear evidence that the scheme, when considered alongside other development proposed in the area, will result in a radical reduction in carbon emissions, as required by the NPPF.

Despite the huge scale of development proposed within the New Carrington allocation, we have been unable to locate the cumulative total for carbon emissions, and the impact of the cumulative effects has been minimised (paragraph 4.15.6) in the wholly absurd and illogical conclusion that the *"likely cumulative effects are similar to those assessed for the Proposed Development"*.

We believe that the cumulative carbon emissions will be major adverse and cannot be mitigated, and, unlike a more sustainable solution, will impede Trafford's climate mitigation measures and the regional carbon neutral goals.

Flood Risk

The road will also increase vulnerability to flooding and reduce resilience to climate change due to the permanent loss of productive Grade 2 agricultural land, and land which currently captures and stores huge amounts of surface water, protecting local homes from flooding.

We do not believe the planning application has taken the cumulative impact of proposed and intended developments in the area sufficiently into consideration. There is no assessment of the impact of heavy rainfall on nearby properties, nor an assessment of the cumulative impact alongside the proposed 'Sale West development', which will affect the same area as the eastern part of the road (and for which a Scoping Report – 115256- has already been submitted). This development includes housing and another road scheme and would further substantially reduce the agricultural land, the breeding and feeding grounds for red listed birds and the area that protects local homes from flooding.

The Environment Agency confirms⁹ that 6.3 million properties in England are already at risk, with that figure expected to rise to 8m by 2050. What should also be recognised is that less affluent residents are both more likely to be flooded and will be impacted more seriously when they are, leading to a disproportionate impact of flooding on deprived communities. It is recognised that both Sale West and Partington are areas of deprivation.

NPPF paragraph 170 requires that development should be directed *"away from areas at highest risk"* and that *"Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere"*.

Policies within PfE (JP-S4, JPA30) also refer to minimising and mitigating flood risk.

⁹ <https://www.gov.uk/government/publications/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024>

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Development of the eastern part of the Carrington Relief Road will substantially increase the risk of flooding for those who live in Sale West but, given the minimal mitigation measures, those who live on Isherwood Road, facing one of the (now just three) attenuation ponds may also be confronted with flooding if the pond cannot capture and store all the water from future severe weather events. It is also likely that draining water into the River Mersey will put homes and businesses downstream at a higher risk of flooding.

Whilst the ES Non-Technical Summary (document 1538053) recognises (paragraph 4.13.11) that there *“is potential for increased volume of surface runoff and flood risk due to an increase in impermeable area”*, we do not believe the flood risk assessment has adequately taken into account the level of surface water captured and stored on the land that will host the eastern part of the CRR. The aim of the sequential test set out within the NPPF is to steer new development to areas with the lowest risk of flooding from any source. Residents have repeatedly highlighted the risks of increased flooding if this area is developed.

The proposal for the eastern part of the CRR does not meet NPPF paragraph 174. The alternative option (upgrading the existing route between Isherwood Road and Banky Lane) would result in a much lower risk of flooding. Indeed, the Preferred Options report (document 1538831) highlights (page 43) that *“Option F requires 2.5 times more water storage than Option A”* (Option F being the route across the fields, Option A being the existing road route) and our lived experience of this area suggests that is a substantial underestimate of the difference in water storage needed.

The determination of this planning application should also consider NPPF paragraph 181, which requires that *“local planning authorities should ensure that flood risk is not increased elsewhere”*. Clearly, the cumulative flood risk for Sale West properties does not meet this policy requirement.

The Environmental Assessment appears to have **only** considered the vulnerabilities and consequences of climate change on road users, not on local residents. Table 16-27 (document 1545732, ES Chapter 16 Climate Updated) states, in relation to Heavy Rainfall Consequences, for example, that accident rates could increase and there may be delays and suggests that this development will *“deploy new safety infrastructure”* meaning that the consequences would be greater without the new road.

We disagree with this conclusion (and would have similar comments in relation to the category ‘Changes to Extreme Weather’).

As mentioned above, the impact of any accidents will be exacerbated if HGVs are involved and, particularly if, they are carrying hazardous materials (which could lead to an increase in contamination of environmentally and ecologically sensitive areas due to road run-off). The assessment also does not take into consideration the impact of potential collisions with the wildlife occupants of the eastern part of the scheme or that the Amey team has highlighted how safe the existing road is.

ES Chapter 16 Climate Updated (document 1545732) suggests that the impact of heavy rainfall will be ‘not significant’ because drivers will be exposed to the same risks as on the existing road. This is incorrect. Heavy rainfall on the eastern part of the road will expose drivers to more risks and could cause more accidents than on the existing road because of (i) the amount of induced traffic, (ii) the speed limit (40mph), (iii) the presence of wildlife on the road, and (iv) the potential for water to accumulate on the road itself (given the reduction in the permeable surfaces in the area).

We do not believe the mitigation measures are sufficient to capture and store all the surface water that currently accumulates in the eastern part of the road (evidence of the extent and levels of water is available on the Carrington Lake page of our website¹⁰).

¹⁰ <https://friendsofcarringtonmoss.com/carrington-lake-2/>

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Given the repeatedly raised concerns of local residents, this should have been a key part of the Environmental Assessment and should have included the cumulative impact of all proposed developments that will affect the River Mersey, Sinderland Brook, Red Brook, the River Bollin and other local water courses.

Protecting Green Belt Land

In relation to NPPF Chapter 13 (Protecting Green Belt land), determination of this planning application should give substantial weight to the significant harm to the Green Belt (paragraph 153). Given the alternative options that are available to Trafford for the eastern part of this road (including investing in more sustainable travel modes, upgrading the existing A6144 and the existing active travel routes across the moss), “*very special circumstances*” cannot be demonstrated. For the same reasons, the requirement for a Green Belt location set out at NPPF paragraph 154 h iii is not met.

The Planning Statement (document 1535827) recognises (paragraph 9.3) that this scheme “*constitutes inappropriate development within the Green Belt*” and suggests (paragraph 7.9) that “*No part of the eastern sector of the allocation has been taken out of the Green Belt to cater for the CRR*”, recognising the adverse effects (paragraph 7.20).

The planning application does not, however, mention that it will intentionally downgrade the existing Green Belt, and will deliberately create Grey Belt, which will facilitate yet more development in this area, leading to more traffic, more congestion, more pollution and more collisions. The original proposals for development at New Carrington were 11,000 homes and 7m m² employment space. Whilst those figures were reduced (to 5,000 homes and 350,000 m² employment space) during the spatial plan development period, it would be irrational and naïve to suggest that developers would not take advantage of Grey Belt designation, especially given the impact of the COMAH zones on the brownfield land (which, among other issues, for example, minimises the number of employees ‘permitted’ in parts of these areas).

We note that a recent legal judgement¹¹ confirms that the purpose of the Grey Belt policy (NPPF paragraph 155) is to enable the release of Green Belt land to meet development needs.

The PfE vision (Planning Statement, paragraph 7.25) for Green Belt is, therefore, meaningless. The road **will** create Grey Belt land, and this **will** result in additional planning applications for more development.

Conserving and Enhancing the Natural Environment

Chapter 15 of the NPPF (Conserving and enhancing the natural environment) is also very relevant to this planning application, given the extensive environmental and ecological harms that will be caused by the eastern part of the road. This scheme does not meet the policy set out at paragraph 187 of the NPPF, which requires planning decisions to “*contribute to and enhance the natural and local environment*”.

It does not, for example, protect or enhance valued landscapes, sites of biodiversity or soils (including peat soils, which will be impacted by the hydrology changes caused by the road). It does not recognise “*the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland*”. There is no estimate of the financial value of natural capital or ecosystem services set out in the planning application.

¹¹ <https://d2nsgnsf036lw8.cloudfront.net/PDFs-documents-and-other-resources/Judgments-and-decisions/Wrotham-PC.pdf>

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The Planning Statement (document 1535827) highlights (paragraph 8.34) that there are “a number of Important Ecological Features (IEFs) that were identified across the Site” and (8.35) that field surveys revealed endangered species, bat activity and red listed birds.

We disagree with the statement (8.36) that the “majority of potential impacts will arise during the construction phase”. The document itself (8.37) confirms that ecological corridors will be impacted through loss, fragmentation, disturbance, pollution, direct mortality or injuries and the potential spread of invasive species. They could also be impacted by contamination from road run-off. The paragraph continues by recognising that the ecological pressures will continue and may increase during the operational phase of the scheme. This will include the significant air, noise, light, vibration and dust pollution that we mention elsewhere in this response. As mentioned above, some collisions may involve HGVs carrying hazardous materials, which could result in contamination of sensitive habitats.

These concerns are reinforced in the ES Non-Technical Summary (document 1538053), which acknowledges (paragraph 4.6.8) the potential for reducing ecological connectivity and the increased risk of collisions. The document goes on to confirm that (4.6.9) “Operational lighting will introduce ongoing disturbance to bats, which are highly sensitive to increased illumination along commuting routes and foraging habitats. Increased levels of noise from traffic and the recreational use of the area due to new footpaths and cycle ways may potentially disturb breeding birds and other species using adjacent retained habitats. There is also an ongoing risk of pollution to adjacent habitats including watercourses”.

We disagree with the assessment (Planning Statement, 8.41) that the impact on IEFs will be ‘slight adverse’. The Transport Assessment Report (document 1537381) suggests (paragraph 8.1.4) that the scheme “incorporates measures to protect and enhance local green spaces, such as Carrington Moss, which supports the NPPFs [sic] environmental sustainability objectives”. The mitigations are minimal and weak and do not counteract, neutralise or reduce the harms caused by the road scheme. We believe the residual impacts will be substantial.

The Skylark Management Plan (document 1538904), for example, acknowledges the extremely significant impact of the losses to be incurred by the eastern part of the road scheme, with the recognition that “the habitats within the CRR corridor form one of the last contiguous open-field areas in this part of Trafford. Their loss will therefore contribute to a Countyscale decline in breeding opportunity for farmland birds, extending beyond the immediate footprint of the road”.

This would lead to what is described as a ‘moderate adverse’ impact during the construction phase of the project, with the document continuing to identify the “permanent loss and fragmentation of functional breeding habitat and consequent displacement of the local skylark population”.

The disruption and destruction of habitats and species will begin immediately on approval of the planning application. The creation of mitigation areas will take time. Even targeted mitigation to support the populations of these already red-listed bird species will not achieve the aims and will undermine local, regional and national environmental objectives. Populations will decline and may not recover because, for example, the skylark mitigation areas are proposed to be located between two extremely busy roads, with excessive 24x7 traffic, high levels of pollutants and potential contamination.

We do not believe it is possible to mitigate the adverse effects of the eastern part of the road. The solution should, therefore, (to comply with policy) avoid the construction of the eastern part of the scheme and reconsider the alternative option to upgrade the existing route between Isherwood Road and Banky Lane (and upgrade the public rights of way and ecological networks adjacent to that road).

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We welcome the maps provided in the UK Habitat Classification Survey Report (document 1538864), which go some way to addressing the lack of mapping required by NPPF paragraph 192, which was not provided at the planning stage of PfE. The eastern part of the route, however, fractures existing essential wildlife corridors and does not “*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species*”, especially given the identification of this area within Greater Manchester’s Local Nature Recovery Strategy, with both Core Local Nature Sites and Nature Recovery Opportunity Areas being affected by this scheme.

The documentation clearly shows that there is a recognition that the scheme does not “*safeguard components of local wildlife-rich habitats and wider ecological networks*”. As mentioned above, the proposed mitigation is minimal and, for example, proposes underpasses (tunnels) for mammals, which will flood, silt up and become unusable, rather than the wildlife bridges requested by communities, which would provide essential connectivity, and many other benefits, including positive landscape effects given the huge level of development proposed in the area.

The Planning Statement (document 1535827) suggests (paragraph 7.136) that the proposed development will “*deliver a number of environmental benefits; notably the improvement of biodiversity, improved drainage, and improvements to air quality*”. We disagree. All the purported benefits to flora and fauna will be significantly affected by the immense levels of pollution that will arise from the huge volumes of traffic using the route. These have not been calculated accurately in the Environmental Assessment due to the lack of consideration of induced traffic and the use of outdated, flawed datasets and inappropriate comparators as discussed in the Traffic and Transport section below.

As mentioned above, the extensive destruction in the eastern part of the scheme will take place many years before any benefits are delivered, leading to hugely disproportionate effects on ecology and biodiversity. We, therefore, disagree with the statement (at paragraph 7.154), which suggests that the “*measurable gains*” constitute the ‘Very Special Circumstances’ set out in paragraph 153 of the NPPF (mentioned above).

The mitigation hierarchy set out at NPPF paragraph 193 has not been followed. The significant harms to biodiversity could be avoided by the promotion of the alternative option, which would see the eastern part of the road scheme removed from the plan. In addition, the benefits proposed in the documentation (summarised in Planning Statement, paragraphs 7.142 to 7.148) could be provided as ecological enhancement alongside upgrades to the existing public rights of way across the site (ie the alternative option).

Planning permission should, therefore, be refused.

Impact on Peat Moss

The ES Non-Technical Summary (document 1538053) confirms (paragraph 4.8.4) that peat is present on the eastern part of the scheme, and the documentation acknowledges that there will be an adverse impact on Geology and Soils (during both construction and operation).

We believe that the 335 hectare peat moss located on and adjacent to the eastern part of the proposed road will be severely impacted by the hydrological changes caused by this scheme, along with other harmful cumulative impacts caused by other development made possible by the approval of this scheme (including the potential for additional Grey Belt developments should they be proposed).

Natural England considers this peat moss to be a restorable irreplaceable habitat¹².

¹² <https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Places-for-everyone-NE-letter-to-Inspector-30.6.23.pdf>

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Planning application documents (such as 1545732, ES Chapter 16 Climate Updated) state that it *“has not been possible to undertake the proposed detailed intrusive peat survey in the eastern extent of the Site at the time of preparation of the ES”*. This means the harms to the peat moss and the associated compensation have not been fully assessed. This should include both direct harm (caused by removal or piling of the peat that is on the site of the proposed eastern part of the road) and indirect harm (caused by hydrology changes, due to the drainage strategy being proposed).

It also means that the Natural England scoping request to identify *“how the development impacts the natural environment’s ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment’s contribution to achieving net zero by 2050”* has not been completed.

Whilst the ES Non-Technical Summary (document 1538053) dismisses the impact on peat (paragraph 4.7.1) and suggests that the *“peat encountered does not represent “Deep Peat” as per the definition adopted in England”*, we disagree. Natural England’s advice on this matter should be paramount. We are aware that even very low depths of peat can support restoration but given the lack of a peat survey and the presence of very deep peat in the area (an adjacent planning application, 115160, found peat depths of between 100cm and 300cm), along with the proposed hydrological changes that will impact the wider peat moss, this issue should have been given a higher priority in the preparation process.

The Transport Assessment Report (document 1537381) suggests (paragraph 8.1.11) that the CRR is integral to the proposal for the Southern Link Road, which forms part of the cohesive transport strategy for the locality. The Southern Link Road will be constructed across the deepest part of the peat, causing the complete destruction of this restorable, irreplaceable habitat. This once again confirms that the whole allocation will be car/HGV dependent and dominated rather than sustainable development, supported by sustainable transport at its core!

It should also be recognised that the drainage proposal will impact wider wet woodland habitats, which is priority habitat.

Given the alternative options, we do not believe there are *“wholly exceptional reasons”* for the loss or deterioration of this irreplaceable habitat, nor does a suitable compensation strategy exist, as required by NPPF para 193c. Planning permission should, therefore, be refused.

Best and Most Versatile Agricultural Land

We note that the importance of best and most versatile agricultural land is acknowledged in the documentation (for example, ES Chapter 13 Agricultural Land. document 1538112, paragraph 13.3.3, document 1535827, paragraph 8.20 and document 1538053, paragraph 4.7.4) but, despite the available alternatives, the planning application proposes the sacrifice of 28 hectares of productive Grade 2 agricultural land, plus will impact a further 12 hectares.

The ES Non-Technical Summary (document 1538053), paragraphs 4.7.14 and 4.7.15 confirms that there will be significant temporary and permanent adverse effects on the loss of best and most versatile agricultural land and soil resources.

NPPF footnote 65 states that *“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”*. This policy once again supports the frequently requested community proposal to consider alternatives to the highly damaging eastern part of the scheme.

In addition, economic growth is supposed to be considered for both the rural and the urban economies, but this development will not support a ‘prosperous rural economy’ (paragraph 88). It will cause huge harms to rural businesses and their supply chains.

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Document 1538112, paragraph 13.4.11 confirms that the “*economic assessment, applied to operational only, considers land loss, farm viability and access/severance*”. A comprehensive assessment of the natural capital and ecosystem services value does not appear to have been undertaken. In fact, natural capital appears to have been dismissed at every opportunity. Paragraph 13.7.9, for example, states “*No deep peat deposits were mentioned by the tenant farmer*”. This does not mean deep peat is not present.

Whilst we recognise that the permanent land take (28 hectares permanently lost to farming) has been considered within the operational impacts (for both the agricultural land holding assessment and the economic assessment), the natural capital and ecosystem services value of the land has not been included within either the construction or the operational economic assessments.

Despite paragraph 13.10.4 suggesting that “*a reduction of 20-25% in profitability for the farm's arable enterprises*” and a minimum of “*10% for the livery business*”, the ES has assessed the economic impacts to be ‘*Slight*’. This is an extremely unreasonable evaluation especially as the ES Non-Technical Summary confirms (paragraph 4.11.4) that the “*proposed development will have a significant adverse effect on Dainewell Farm*”, with permanent land loss and reduced farm viability which cannot be avoided and is assessed as ‘*significant*’.

The ES Non-Technical Summary highlights (paragraph 4.11.2) that the construction phase of the scheme will result in “*fragmentation of fields and access constraints*” and “*possible damage to drainage systems, potentially increasing flood risk in arable fields*”. Paragraph 4.11.3 confirms the operational impacts, including permanent loss of agricultural land, reducing the productive area and altering field configurations, making some areas unsuitable for arable cropping, along with access constraints and fragmentation that will affect operational efficiency and logistics.

We consider the adverse impact to Dainewell Farm to be much higher than Moderate and the impact on the livery business will be much more widespread, with financial, health and wellbeing impacts for clients as well as the farmer.

The overall financial impact on the rural economy and all its stakeholders does not appear to have been taken into account, with no mention of the impact on horse-owners and riders, and their supply chains, such as increased costs of livery services, the prospect of finding a new livery service within a reasonably local area, and safety issues with the new road.

Effects of Air, Noise, Light, Vibration, Dust and Water Pollution

NPPF Chapter 15 also makes reference to the importance of taking into account the likely effects, including the cumulative effects, of new developments in relation to pollutions (paragraph 198). The air, noise, light, vibration, dust and water pollution (including from road run-off) impacts of this road on both human and wildlife health will be extensive. Whilst this has been partially recognised in the documentation, we do not believe the assessments acknowledge the serious impacts that will be incurred by local residents and conservation areas. This is particularly the case given the flawed approach to calculating the anticipated traffic volumes.

In addition, NPPF paragraph 96 suggests that planning policies and decisions should aim to achieve healthy, inclusive and safe places which (c) “*enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities*”.

Yet, as demonstrated in the Transport Assessment Report 15357381, figures 6.1 and 6.2, huge increases in traffic (which does **not** include **all** anticipated traffic) will lead to similarly huge increases in pollutants. This means the risks and the impact have been substantially understated.

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The government's Public Health briefing (May 2016¹³) suggests that less affluent areas "have a higher density of main roads, leading to poorer air quality, higher noise levels and higher collision rates". Health inequalities are further exacerbated because "residents of deprived communities tend to travel less than the better off but feel the impact of other people's travel. In short, increasing car dependency has led to increasing unfairness".

The vision for New Carrington is a clear example of this, with ONS data¹⁴ showing around 40% of those living in many of the ONS small output areas in Partington and Sale West, for example, do not have access to a car. They will, therefore, be impacted by the health and other inequities of this road, impacted by the through traffic, travelling from more affluent areas, increasing pollution for local residents. That same Public Health report suggests that "it has been estimated that half of the UK's £10bn cost per annum of air pollution comes from road transport", meaning that this new road will add costs to the public purse, not just in relation to the health services needed to address increased respiratory and other long term chronic illnesses, but, as mentioned above, other mental and physical health conditions, along with the health, fire and police services costs of dealing with increased road accidents and incidents.

Removing the eastern part of the road scheme would significantly reduce the adverse effects of the road because it would no longer be attractive to through traffic, limiting the number of vehicles drawn from the M60 and the M6 through residential areas. This change to the scheme would also protect current tranquil areas and intrinsically dark landscapes, appreciably limiting the impact of exponential increases in pollution that would be caused by the road.

ES Chapter 14 Socio Economic and Human Health (document 1538080), paragraphs 14.8.55 and 14.8.56, sets out a number of intangible, indirect benefits that are merely aspirational. These could equally be delivered by the alternative option.

We discuss pollution further in the Traffic and Transportation section below.

The ES Non-Technical Summary (document 1538053) highlights (paragraph 4.15.8) that there is likely to be a significantly adverse effect on some properties as a result of Operational Noise levels. We do not believe that these extensive effects are neutralised by the mitigation measures, or by the supposed benefits set out at paragraph 4.15.9, as noise pollution will affect far more receptors than those identified within the documentation.

Other NPPF Policies

In relation to other parts of the NPPF, document 1538080 (paragraph 14.7.47) highlights the number of sports and recreation activities available to residents in the eastern part of the route. Yet the "robust and up-to-date assessments of the need for open space, sport and recreation facilities" (required by NPPF paragraph 103) has not been carried out for the area known as Carrington Moss. This was also omitted from the wider assessment undertaken in advance of the recent Local Plan consultation.

The eastern part of the CRR will cut across land that is extremely well used open space. It is used for walking, cycling and horse riding, for various recreational activities and is adjacent to Manchester United, Sale Sharks and Sale Rugby training grounds.

¹³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf

¹⁴ <https://www.ons.gov.uk/census/maps/choropleth/housing/number-of-cars-or-vans/number-of-cars-5a/no-cars-or-vans-in-household?oa=E00030928>

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An NPPF compliant assessment should have already been carried out but given it has not been, it should have been included within the planning application documentation for the road. The absence of this assessment means that the planning application also does not comply with NPPF paragraph 104, which, in addition to a current assessment, requires that the development clearly shows that the open space or land is surplus to requirements or that the facilities would be replaced by equivalent or better provision. This proposal does neither.

Whilst walking and cycling routes are being provided alongside the road, they will be unhealthy, unsafe and unpleasant to use due to the huge traffic numbers, the excessive pollution, and potential collisions. The needs of the over 1,000 horses stabled on and around the moss have not been adequately considered and access to safe hacking routes of varying distances (as exists today) are being severely constrained and fractured, including for those who have special educational needs.

The proposal is also not compliant with the expectation (NPPF paragraph 105) that public rights of way and access should be protected and enhanced.

Places for Everyone (PfE)

The inadequacy of the policy considerations when developing the Places for Everyone plan, means that a number of other NPPF policies were not covered at planning stage, including, for example, NPPF paragraph 115, which suggests that sustainable transport modes should be prioritised when assessing sites to be allocated for development, and the requirement for applications to facilitate “*access to high quality public transport*” (NPPF paragraph 117), should also be acknowledged.

This application fails to demonstrate compliance with numerous PfE policies. Whilst we highlight a number of these below and remain shocked by Trafford’s continued dismissal of policies within PfE, given the plan took 10 years and multiple millions of pounds of public money to agree, we have not repeated the detail about the areas of non-compliance that is mentioned in the NPPF paragraphs above.

The proposal conflicts with the strategic intent of PfE and should not be approved in advance of a robust Masterplan, which enables genuinely sustainable transport to be secured, along with supporting the achievement of the Greater Manchester 2038 Carbon Neutral Target.

The Transport Assessment Report (document 1537381) suggests (paragraph 8.1.5) that the CRR is “*an important strategic component*” of PfE, going on to confirm that PfE “*seeks to deliver sustainable development across the region, with New Carrington identified as one of the largest strategic growth areas*”. A road scheme does not support the delivery of sustainable development. It reinforces and remains car/HGV dependent and dominated.

In their final report related to the PfE examination¹⁵, the planning inspectors noted that (paragraph 659) “*The CRR has not just been identified as a means of delivering the New Carrington development, it is also seen as providing accessibility improvements for existing residents, including those in Partington*”. Whilst the current proposal does not deliver those accessibility improvements, the community supported alternative would meet both of these requirements.

As an example of non-compliance, PfE policy JPA30 **requires** (criterion 1) schemes in the New Carrington allocation area to be in accordance with a Masterplan that has been developed in consultation with the local community. That Masterplan has still not been published, so this planning application is premature. The examining planning inspectors asserted (paragraph 641) that “*it is not appropriate for the policy to allow for certain parts of the site to come forward in advance of any masterplan*”. This assertion has been ignored by Trafford, and the word “*requires*” is clearly meaningless in a planning context.

¹⁵ <https://www.greatermanchester-ca.gov.uk/media/9282/pfe-inspectors-report-01-final.pdf>

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Having already approved an application on very deep peat which does not meet that and other important policy criteria, and conditionally approved a further scheme, Trafford's decisions have made the PfE spatial plan and its policies totally irrelevant. In fact, planning decisions for the allocation area seem to be made solely on the basis of whether a developer agrees to pay the required proportionate contributions.

Determining this application in advance of that Masterplan risks embedding unsustainable patterns of travel that are not demonstrably aligned with the adopted development plan. This scheme will not, for example, support achievement of PfE policy JP-Strat14 (A Sustainable and Integrated Transport Network), which aligns with the GM Transport Strategy to confirm that *"half of all daily trips can be made by public transport, cycling and walking"*.

The scheme also does not comply with JP-C1 (An Integrated Network), particularly criterion 3, which aims *"to deliver a significant increase in the proportion of trips that can be made by walking, cycling and public transport"*. The plan also emphasises that (JP-C3, Public Transport, paragraph 10.34), if GM's overall vision is to be achieved *"there will have to be an increase in the use of public transport"*. As this scheme will encourage car-dependency it will not support the achievement of GM's aims.

The aim of policy JP-C6 is to deliver a higher proportion of journeys made by walking and cycling. Despite the provision of active travel routes, the sheer number of motor vehicles, the huge levels of air pollution (particularly PM_{2.5}) and the associated risks to users, will not encourage modal change.

Paragraph 10.72 highlights the criticality of encouraging more people to walk, cycle and use public transport, and minimising the negative effects of car dependency, *"such as traffic congestion, greenhouse gas emissions, air and noise pollution and poorer quality places"*. Going on to confirm *"the importance of these issues, and the related objectives in improving health and quality of life"*, stating that *"it is critical that we get this right"*. This road scheme will not support those goals.

It seems though, that paragraph 10.74 has been written for Carrington, Partington, Sale West and Warburton, with the suggestion that improvements to the public transport network are planned, but that *"it will be impossible to provide every area with good public transport access at all times"*. Given local deprivation, the lack of car ownership and the aims to reduce inequity in Greater Manchester, public transport for these areas should have been prioritised, as it would be beneficial to have good public transport here at least some of the time!

Paragraph 10.75 confirms that policies within JP-C8 (Transport Requirements of New Development) *"seek to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancements on the highway network"*. Clearly that is not what is happening at New Carrington.

This planning application confirms that capacity enhancements for the highway network are being considered ahead of sustainable transport options. The Carrington Relief Road maintains the prominence of car/HGV-dependent and dominant development.

In relation to the JP-C8 policy requirements, this development does not:

- reduce the negative effects of car dependency
- help deliver sustainable environments
- promote alternatives to car ownership
- encourage walking, cycling and public transport use
- provide for overnight parking and rest areas, with appropriate facilities, for HGV drivers
- reduce transport emissions and other environmental impacts

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- reduce traffic congestion or the number of vehicle movements
- appropriately consider the air quality impacts on Holcroft Moss.

In addition to the above, the importance of sustainable transport options is set out in other policies, such as JP-H4, which explicitly links increased density in accessible locations with reduced car dependency and increased walking, cycling and public transport use.

Furthermore, this proposed scheme is yet another example of land being taken for development prior to a clear understanding of the need for locations to address the cumulative mitigation and compensation requirements of the whole allocation, despite the high concentration of natural capital assets in the eastern part of the scheme.

The Natural Infrastructure Strategy components of that Masterplan have not yet been publicised. This work only commenced in December 2025 and has been subordinated by Trafford when considering other aspects of the infrastructure needed (over a year ago).

Whilst we acknowledge that the road scheme is mentioned at JPA30, criterion 13, Trafford has recognised that this allocation area is unsustainable and that sustainable transport options are needed. This planning application will not make it sustainable, unlike the alternative strategy that has been repeatedly proposed by communities, and there is a lack of commitment to, and funding for, sustainable transport options.

The Green Belt part of the eastern area of the scheme is considered by communities to be essential for allocation-wide mitigation and compensation. If approved in advance of a comprehensive Masterplan, this application will leave local residents vulnerable to solutions that leave them suffering the effects of development, whilst citizens elsewhere reap the benefits of offsite mitigation and compensation for the harms caused. This contradicts JPA30, criterion 17 and the deliberate creation of Grey Belt conflicts with JPA30, criterion 19, PfE policy JP-G2 and PfE policy JP-G9.

The Planning Statement (document 1535827) is rather selective in its identification of the PfE policies which should be adhered to by this scheme and we disagree with the assertion (paragraph 8.49) that the various Management Plans and other documents submitted with the planning application “*demonstrate that the Proposed Development makes a significant contribution towards biodiversity on the application site in accordance with PfE Policy JP-G8*”. This is extreme greenwashing and, as highlighted above, the damage caused by the eastern part of the route will cause substantial and permanent harms.

In fact, the Arboricultural Report (153976) confirms that almost 700 trees will be felled to support delivery of the scheme, yet there is no reference to PfE policy JP-G7 (Trees and Woodland), criterion 12, which states that trees lost to development should be replaced on a 2:1 basis. The land needed to meet that policy requirement does not appear to have been identified within the planning application documentation.

The road scheme also undermines JPA30 Green Infrastructure policies 20 and 21, Natural Environment policies 23, 24 and 25 and Landscape policy 28. Important features such as the Rides, the hedgerows and tree belts will be significantly impacted.

The scheme also does not support achievement of JP-S2 (Carbon and Energy), which aims to deliver a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions. This road scheme will significantly increase carbon emissions due to the amount of induced traffic and additional journeys explicitly generated by the road. Criterion 5 of this policy requires new development to be net zero carbon.

The scheme does not comply with policy JP-S4 (Flood Risk), nor JP-S5 (Clean Air), which requires (criterion 1) that transport investment should be focused to “*reduce reliance on forms of transport that generate air pollution*”. The road will also conflict with other criteria within that policy, such as criterion 3, and criterion 7.

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The scheme will particularly be non-compliant with criterion 11 (which requires development to be located in areas that “*maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users*”).

We also do not believe the scheme complies with Greener Places policies JP-G1 (Landscape Character), JP-G2 (Green Infrastructure Network), JP-G4 (Lowland Wetlands and Mosslands) and Places for People policies JP-P1 (Sustainable Places), including criterion 14, which suggests locations will be well-connected to other places, “*particularly by public transport*”, JP-P6 (Health), which aims to tackle health inequalities.

Trafford’s Current and Previous Local Plans

It is notable that Trafford repeatedly suggests that this road has “*been many, many years in the planning*” (just one example from Councillor Liz Patel¹⁶). This is a huge overstatement!

Document 1535813 (called ‘Part1’ on the Council’s Planning Portal, but actually the Statement of Community Involvement), confirms that the route of the scheme was limited to just the A1 (western part) in the 2012 Core Strategy, hence the Planning Inspector amended the proposed wording and reduced the anticipated costs of the scheme to £3m¹⁷ (for what was then called the Carrington Link Road). It was anticipated that those costs would fall to the developers. Document 1535813 also confirms that the eastern part of the route was proposed by the major landowner to support their development ambitions in the area.

Despite other, more sustainable transport options being proposed in the UDP 2006 and the Core Strategy 2012, Trafford did not take any of those sustainable passenger and freight transport options forward, including:

- a bridge across the Manchester Ship Canal to direct traffic onto the A57 (again anticipated to be funded by the private sector – see page 80 of the Core Strategy)
- multiple policies suggested that the Council would seek to secure improvements to the availability, frequency and reliability of the public transport network, including trams, trains and bus services
- policies were also included about making better use of rail and water for freight to ensure delivery of a more sustainable distribution system.

In fact, the 2006 UDP and the 2012 Core Strategy identified Carrington, Partington and Sale West as “*priority regeneration areas*”, with public transport improvements being **critical** to achieving the objectives of these local plans.

UDP 2006	TRAFFORD COUNCIL	Core Strategy 2012
<ul style="list-style-type: none">• Priority Regeneration Areas include Carrington (E15), Partington (H11) and Sale West• Carrington (E15) the Council will make provision of enhanced transport facilities for buses, cycles and pedestrians to improve the areas links to other parts of the Borough• Partington (H11) the Council will take action to: viii) Improve local community transport provision and public transport links to other parts of the Borough• Sale West - measures include the development of better public transport links in an area where lack of adequate links has compounded the problem of poor economic activity		<ul style="list-style-type: none">• Policy SL5.2 Carrington and Partington - Significant improvements to public transport infrastructure by improving access to Partington, the Regional Centre and Altrincham with links to the Metrolink system• SL5.4 In order for development in this Location to be acceptable the following will be required:<ul style="list-style-type: none">• Contributions towards schemes to mitigate the impact of traffic generated by the development on the Strategic, Primary and Local Road Networks; these include public transport and highway infrastructure schemes;• Policy L4.5 The Council will seek to secure improvements to the frequency and reliability of the public transport network and support further development of a high quality integrated public transport network

¹⁶ <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/is-settlement-trafford-wasnt-built-33357128>

¹⁷ 110304 CD12.54.7 Request for Clarification of Policy SL5.4 in Relation to the Carrington Link Road

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Despite these aspirations, bus services have been severely depleted in Carrington, Partington, Sale West and Warburton in the years since these documents were produced. Trafford has failed to deliver the public transport improvements set out in the 2006 UDP and the 2012 Core Strategy and there is still no committed funding to improve public transport in the area.

In relation to the land in the eastern part of the route, Trafford has previously sought to protect the best and most versatile agricultural land **from** development. As outlined above, there was no indication in the Core Strategy that the route of the road would impact this land.

UDP 2006	TRAFFORD COUNCIL	Core Strategy 2012
<ul style="list-style-type: none">Trafford would continue to protect the Green Belt in this area and would “safeguard the best and most versatile agricultural land from forms of development that would irreversibly destroy its longer-term potential”Trafford would refuse planning permission for new development on various areas of land including land in Warburton (immediately to the south of Partington) and the land south of Shell, Carrington. This is the area known as the Carrington Rides. Trafford designated it as a local nature conservation site which, as such, would be retained, protected and, wherever possible, enhanced.		<p>R4.5 The Council will protect existing agricultural land as an important resource for Trafford’s local economy. In particular, the Council will seek to protect the Borough’s:</p> <p>(a) Richest soils located south of Carrington Moss (Settled Sandlands) for agricultural purposes</p> <p>R4.6 In order to support Trafford’s agricultural community, the Council will consider appropriate farm diversification proposals where it can be demonstrated that the proposal would not:</p> <p>a) Replace the existing agricultural use;</p> <p>b) Have a detrimental impact on the existing ecology and landscape of the area; and</p> <p>c) Be contrary to Government Guidance or other policies within this Plan.</p>

The 2012 Core Strategy also required development to protect and enhance the mossland “as a carbon sink to mitigate the effects of climate change” and to protect and enhance “the sites of nature conservation and biological importance, including the Carrington Rides, Broadoak Wood and Brookheys Covert”. This proposed development will be extremely harmful for those natural capital assets.

The planning application documents (including for example, the Planning Statement, document 1535827), are, once again, very selective in identifying the local plan policies that should be considered by this scheme.

This scheme also will not support the aims set out in the Draft Trafford Local Plan. Connectivity and accessibility are only enhanced for the few, but not those in deprived communities who do not have access to a car in their household, nor those who are unable to utilise the active travel routes for their journeys. In relation to car ownership, for example, ES Chapter 14 Socio Economic and Human Health (document 1538080) refers (paragraph 14.7) to Ward level data but at more local levels, in Partington and Sale West specifically, around 40% of households do not have access to a car.

Communities have long been calling for more sustainable transport options in the area, such as reopening the former railway line and increasing bus services, but these are **STILL** not included in the Draft Local Plan or the latest iteration of the GM Transport Strategy 2050.

Furthermore, in December 2024, Trafford’s Executive¹⁸ welcomed and endorsed the proposals from the Task and Finish Group to Reduce Car Dependency. This proposal does not support that strategic aim.

Other Relevant Government Policies

Climate Change Act 2008

The NPPF makes it clear (paragraph 162) that plans “should take a proactive approach to mitigating and adapting to climate change” in line with “the objectives and provisions of the Climate Change Act 2008” (footnote 61), which introduced a legally binding framework to reduce greenhouse gas emissions.

¹⁸ <https://democratic.trafford.gov.uk/ieDecisionDetails.aspx?AllId=42077>

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Whilst the Act is mentioned in, for example, document 1545732 (ES Chapter 16 Climate Updated), this planning application does not support the attainment of that goal. In fact, this scheme will be detrimental to its achievement as this unsustainable solution will increase carbon emissions. Despite acknowledging (document 1545732, paragraph 16.5.8) that “any emissions will have a long-term, irreversible negative effect on the global atmosphere”, there is no reference to alternative, less harmful, solutions.

Environment Act 2021

The Environment Act 2021 established a number of legally binding targets, including the following:

- Halt the decline in species populations by 2030, and then increase populations by at least 10% to exceed current levels by 2042
- Deliver our net zero ambitions and boost nature recovery by increasing tree and woodland cover to 16.5% of total land area in England by 2050
- Cut exposure to the most harmful air pollutant to human health – PM_{2.5}.

The government’s Office for Environmental Protection issued an update in January 2026¹⁹, which confirmed that progress on meeting these remains “*off track*”.

This planning application does not support the attainment of any of these targets. In fact, it will be detrimental to their achievement as it will, for example, destroy the habitats of threatened species (further reducing their populations), it does not support the delivery of net zero ambitions, and it will significantly increase exposure to PM_{2.5}.

It should be noted that the government has recently issued a report²⁰ citing global biodiversity loss as a national security issue confirming the importance of UK food security and that greater investment in the agri-food sector is needed. The permanent loss of 28 hectares of productive Grade 2 agricultural land, plus the impact to other natural capital and ecosystem services suggests that this scheme is not aligned with the country’s current and future needs.

Enabling Citizens to Influence the Plans for their Areas

In addition, the government has repeatedly suggested that citizens should be able to influence the plans for their areas. This is covered in multiple policies, including those mentioned below. It is clear that the decision to progress this scheme is developer-led, despite local feedback (set out in the Consultation section below) explicitly confirming that the vast majority of residents do not support this scheme and that resident supported alternatives (also set out below) are available.

Local Outcomes Framework:

The government has recently published its Local Outcomes Framework²¹, which expects districts to improve priority outcomes, to support oversight and accountability, and to assess compliance with the Best Value Duty.

The first of the Framework’s principles is that “*Local government as leaders of place will work in partnership with other local bodies, local residents and service users to deliver the best outcomes for local people and communities across England*”.

¹⁹ <https://www.theoep.org.uk/news/actions-now-will-determine-whether-key-2030-environmental-targets-are-met-says-oep-report-eip>

²⁰ https://assets.publishing.service.gov.uk/media/696e0eae719d837d69afc7de/National_security_assessment_-_global_biodiversity_loss_ecosystem_collapse_and_national_security.pdf

²¹ <https://www.gov.uk/government/publications/local-outcomes-framework/local-outcomes-framework>

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The Carrington Relief Road does not result in outcomes for local communities that can be measured positively in the Local Outcomes Framework, including for metrics such as (among others):

- **Percentage of people who feel they can influence local decisions:** given that almost 77% of responses to the previous consultation confirmed that they are NOT in favour of the proposed relief road (which is consistent with, for example, responses to the previous Places for Everyone consultations), developers clearly have much more influence in Trafford than residents
- **Access to green and blue spaces:** this scheme will reduce access to green and blue spaces, and will deplete the populations of red listed birds and endangered wildlife
- **Deaths attributable to particulate air pollution:** this scheme will increase the number of deaths that are explicitly attributable to PM_{2.5}
- **Flood resilience:** this scheme will increase flood risk for communities
- **Connectivity score for public transport to key services (DfT Connectivity Tool):** this scheme will not improve the local Connectivity Score
- **Passenger journeys on local bus services per head by local authority:** this scheme will not generate an increase in passenger journeys (but it will generate an increase in car journeys).

Civil Society Covenant²²

The government's Civil Society Covenant states that the public sector will (among other things):

- *Promote participation and inclusion by involving people in decisions that affect their lives, ensuring their voices are heard and removing barriers to democratic participation.*
- *Strengthen trust with open communication and sharing of information, data, and best practice.*

Given that this scheme continues to propose the eastern part of the route, has dismissed resident feedback, and that key data is missing from the planning application documentation, Trafford is clearly not meeting these obligations.

Pride in Place Strategy²³

The government's Pride in Place Strategy states that the programme has three core objectives, one of which is "*To empower people to take back control – Everybody should be empowered and in control of their lives and have a say over the future of their community*". We do not believe local people have control. Here in Trafford, planning is being driven by what will benefit the developers, not what will benefit communities.

In the original announcement, Steve Reed Secretary of State MHCLG highlights that "*Communities are losing the things in their neighbourhoods that matter most to them*", that "*Through our Pride in Place Programme, we are helping communities take back control*" and that the government is "*putting working families in control of their lives and their neighbourhood*". Trafford should be acknowledging these aspirations and ensuring that their citizens feel their voices are being heard.

²² <https://www.gov.uk/government/publications/civil-society-covenant/civil-society-covenant>

²³ <https://www.gov.uk/government/publications/pride-in-place-strategy/pride-in-place-strategy>



Green Claims Code

The government's Green Claims Code²⁴ requires that any environmental claims made by an organisation must follow some specific principles which are:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated

Much of the Carrington Relief Road consultation documentation does not comply with these principles, we provide some examples below and others elsewhere in this response:

- The lack of acknowledgement of induced traffic has resulted in significant underestimates in relation to, for example, pollutions, carbon emissions, traffic accidents and incidents, which means the Environmental Statement is not an accurate representation of the significant impacts of the planning application and the cumulative developments in the area.
- The Transport Assessment is based on very old data (2014), flawed comparisons and, as it excludes much of the anticipated traffic that would use the road, it is also incomplete. There also appears to be no recognition that, in addition to residents travelling out of the area to access the job market, employees travelling to New Carrington will be coming in their cars, because of the chronic lack of public transport options.
- It is neither clear nor unambiguous to lack compliance with numerous local, regional and national planning policies. Reasons for non-compliance is not explained in the planning application.
- There are a number of inconsistencies within the documentation, as an example, document 1545732 (ES Chapter 16 Climate Updated) states (paragraph 16.3.1) that "*Land use change has been assessed within the full Proposed Development*". Yet, in the same document (paragraph 16.5.7), it states that "*Land use change has been excluded from the assessment. It is understood there may be some peat disturbance; however, the assessment of land use change was not within this scope of works*". This is not only extremely confusing, it leads to questions about the reliability of the Environmental Assessment. Land use change should be included within the scope of works. It is an essential element of the scheme.
- There are a number of documents and information that are missing from this planning application, including, among many other documents, the detailed peat survey, these missing documents are discussed below. These gaps in data have resulted in, for example, the Socio-Economic effects being assessed as beneficial (during both the construction and operational phases), yet, as set out elsewhere in this response, much has been missed from the appraisal. There is no Natural Capital and Ecosystem Services assessment, for example, and the benefits are based on unsubstantiated assumptions.

²⁴ <https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services>

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- The comparisons provided in the Transport Assessment (using locations that are not comparable) are not fair or meaningful. The journey-time data includes locations outside of the red line boundary, which this scheme cannot influence, this is also not meaningful.
- The provision of a road is a service to its users. Its 'full life cycle' is the period up to which the road needs to be enhanced, extended or otherwise changed. The GM Transport Strategy 2050 (Explore and Develop, page 76) highlights that there is expected to be a Carrington Spur Upgrade which will be delivered prior to 2037 if possible. In addition, the planning application mentions that some junctions will operate near to capacity within 15 years.
- The planning application should also make it clear which environmental benefits will be achieved at what points in the life cycle of the road. It should be explicit about when harms will take place, when the mitigations will be delivered and when the benefits will be achieved as it is likely that threatened species will be eradicated in the intervening period and their populations will not recover.
- Document 1545733 paragraph 5.4.9 (and 5.4.56) suggests that Amey's transport team found that in both 2030 and 2045 there would be a net reduction in vehicles and HGVs/day as a result of the Proposed Development and suggest that "*the Proposed Development is predicted to contribute to an improvement in air quality in and around Holcroft Moss*". We believe this claim should be fully substantiated because the Trafford Green Hydrogen Plant alone is expected to result in over 700 additional HGVs per day on the road networks. Clearly the other approved developments in Carrington will also increase HGV traffic. These vehicles will not be making local journeys. Many will impact the Holcroft Moss conservation area.

Other Policy Requirements

This proposal does not support the aims of either the GM 5 Year Environment Plan, or the Right Mix targets in the GM Transport Strategy.

Greater Manchester 5 Year Environment Plan

The 5 Year Environment Plan²⁵ (page 12) sets out the importance of environmental assets (not just in terms of our health and wellbeing, but also for the prosperity of the city-region), the scale of threats and harm to be caused by climate change and the decline of ecology and biodiversity, "*with nature under increasing pressure and less able to provide us with the benefits that are fundamental to our citizens and businesses*".

The document highlights the need to adopt a sustainable transport system to meet GM's ambition of reaching carbon neutrality by 2038 and states that "*we need a fundamental shift in attitudes towards car journeys, alongside a major shift to sustainable transport modes*". This scheme does not support this aspiration.

The document goes on to contend that "*We need to plan for growth in a way that minimises reliance on the car*". This is not what is being proposed by Trafford for New Carrington. Major car and HGV dependent developments are planned and will be facilitated by this planning application. The Environment Plan raises concerns about increasing vehicle mileage, increased market share of larger heavier vehicles and only marginal shifts to low emission modes. It also highlights that "*more challenging reductions in car travel are likely to be necessary*" to achieve the 'Right Mix' targets set out in the transport strategy mentioned below.

²⁵ https://www.greatermanchester-ca.gov.uk/media/aln10fsy/gmca_5-year-plan_final_digital_v3-ua.pdf

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The Environment Plan highlights (page 60) that *“there is still work to do at local and national level to meet our 2038 carbon neutrality target”* and that achieving the 2038 target *“will require us to scale up the level and pace of delivery”*. Yet, whilst the Environment Plan is mentioned in document 1545732 (ES Chapter 16 Climate Updated), there is no reference to how its key aims will be achieved by this scheme.

Greater Manchester Transport Strategy

Whilst the Carrington Relief Road is mentioned in the current GM Transport Strategy 2040²⁶, that document states that the *“Right Mix vision is for 50% of trips to be made by sustainable modes, with no net increase in motor vehicle traffic, by 2040”*. This vision cannot be achieved when the largest schemes in the region are choosing unsustainable transport options that will result in a minimum of 74% of journeys being taken by car (scenario 2, Transport Assessment Report 15357381, paragraph 2.4.13).

The Transport Assessment Report (document 1537381) suggests (paragraph 8.1.6) that the scheme *“aligns with the Greater Manchester Transport Strategy 2040, which prioritises reducing car usage by improving public transport and active travel and creating a more integrated and accessible transport network”*, with the document continuing (paragraph 8.1.7) to assert that the CRR *“contributes to these regional goals by providing infrastructure improvements which support a shift towards sustainable transport”*. This is not credible. This scheme continues to promote car/HGV dependent and dominated development.

The current GM strategy mentions that the *“former railway line that runs through the site has considerable potential; offering the opportunity to deliver a sustainable transport corridor through the site to Timperley/Altrincham in the east and also extending through to Irlam/Cadishead in Salford to enable better movement across the Manchester Ship Canal”* but, as mentioned above, despite resident preferences, Trafford has no plans to progress this for the foreseeable future.

In response to queries from the press²⁷, Trafford’s Executive member for economy and regeneration said *“We are looking to turn those railway lines into walking and cycling routes for the people of Partington. The concept of us re-opening rail lines [would be] a very long-term proposal with no guarantees that it’ll happen, but the building of the new road and the bus routes that will follow is a tangible investment in public transport.”*

Partington residents need more public transport options, it is not practical to suggest that the around 40% of residents who do not have access to a car (or to local amenities) should get on their bikes or walk!

In addition, Councillor Patel had already suggested that the road has been planned for *“many, many years”*, so Trafford has clearly been very selective about considering potential solutions for the area. Trafford should have been implementing the Core Strategy policies and objectives over the past more than 10 years. There has been more than long enough for a *“very long term proposal”*. The issue is that Trafford is wedded to delivering for developers, not for local residents.

It is also rather disingenuous to suggest that building a new road is *“a tangible investment in public transport”* when one is a commitment and the other is not.

²⁶

https://assets.ctfassets.net/nv7y93idf4jq/01xbKQQNW0ZYLzYvcj1z7c/4b6804acd572f00d8d728194ef62bb89/Greater_Manchester_Transport_Strategy_2040_final.pdf

²⁷ <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/is-settlement-trafford-wasnt-built-33357128>

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There is a current consultation on the GM Transport Strategy 2050²⁸, which retains the Right Mix policy, stating “*Improve our transport system so that, by 2040, 50% of all journeys in GM will be made by public transport or active travel*”. The expectation is that car journeys will be significantly reduced. Given that scenario 2, mentioned above, has been chosen, this scheme does not support that aim.

Consultation and Community Engagement

Community feedback requesting more sustainable solutions has consistently been ignored. Trafford has not consulted its citizens about the alternative, more sustainable transport options. It has simply taken a developer-led approach to destroy priority habitats and species, to significantly harm the financial, physical and mental health of local residents and to retain car/HGV-dependent and dominant, unsustainable communities.

Approval of the CRR appears to be predetermined, which is contrary to the Gunning Principles mentioned below. The Transport Assessment Report (document 1537381) confirms (paragraph 8.1.10) that “*The New Carrington Locality Assessment (2020) reinforces the strategic importance of the CRR by identifying it as a committed and essential scheme*”.

Despite the Council’s recent concession about “*the importance of consultation*”²⁹, this suggests that this planning application consultation and approval is merely a formality, just like the 2025 CRR consultation, following which respondent comments (see below) have been ignored.

Furthermore, the Preliminary Options Appraisal (document 1538688) states (paragraph 1.4) that the objectives were “*defined collaboratively with key stakeholders, including HIMOR and in discussion with TfGM*”. Residents are clearly not considered to be key stakeholders as they were not involved in that collaboration exercise, unlike the main local landowner/developer.

Adherence with the Gunning Principles

The Gunning Principles provide the legal standard for fair public consultation, established in 1985 by Stephen Sedley QC. They aim to ensure that consultations are not just a ‘box-ticking’ exercise.

Documentation relating to this scheme, including this planning application, has not complied with the Gunning Principles³⁰ because, over many years, Trafford has failed to abide by basic consultation best practice:

- communities should have been consulted when the proposals were still at a formative stage – this did not happen
 - Residents should have been consulted about which of the potential transport solutions (road, rail, bus services, bridge over the ship canal – as set out in the 2012 Core Strategy) would provide the most benefits to local communities, taking into account the sustainability scores of each potential solution – no such consultation has ever taken place.

²⁸ https://www.gmconsult.org/transport/transport2050/user_uploads/draft-gm-transport-strategy-2050-4.pdf

²⁹ <https://www.bailii.org/ew/cases/EWHC/Admin/2026/261.pdf> (paragraph 65)

³⁰ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

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- There was no consultation on the route options, only a ‘public engagement exercise’ which merely asked for questions to be raised, questions which have never been responded to, questions from community groups which were received by Trafford but not included in the Executive report, as set out in our review of the report³¹ and not included in this planning application documentation.
- There was no consultation on the New Carrington Outline Transport Strategy 2023³².
- It should be noted that, until 2025, when Trafford had already determined that they would deliver the developer-led road solution and that the eastern part would be included, there was no public consultation about the detailed plans for transport in the New Carrington area.
- sufficient information (in an accessible and easily interpretable format) should have been provided at all stages of this initiative to enable communities and other stakeholders to give intelligent consideration to proposals and to provide an informed response.
 - This has consistently not happened with regard to documentation and decisions related to the CRR. As an example, the Executive report mentioned above also, astoundingly, failed to include the comments received from Natural England, which highlighted that the Options Appraisal was not an accurate representation of the environmental constraints, and provided an inaccurate and unbalanced view of the environmental risks – meaning that the environmental aspects were not properly considered within the Options Appraisal.
 - Our analysis of the CRR Preferred Options Report³³ found it contained biased and misleading information, inaccuracies, contradictions and conflicting statements, and many other issues, as did previous documentation³⁴.
 - In relation to the current planning application, there are serious gaps in the available documentation, which are mentioned below.
- adequate time should have been provided for consideration and response (given the anticipated number and size of documentation, residents requested a 12 week response timeframe, which is the widely accepted good practice consultation period)
 - Despite over 300 very large, very complex documents, some of which were only made available during the consultation period (and some only 2 days before the original deadline date), only 6 weeks was provided for the response to the planning application.
 - Despite Trafford’s planning portal suffering from significant down time during the consultation period (including over weekends when residents were particularly keen to engage with the consultation), Trafford only extended the consultation period by 4 days.
- Trafford should give ‘conscientious consideration’ to consultation responses before a decision is made

³¹ <https://friendsofcarringtonmoss.com/2021/09/23/what-does-traffords-latest-report-about-the-carrington-relief-road-crr-mean-for-affected-residents/>

³² <https://democratic.trafford.gov.uk/documents/s47146/New%20Carrington%20Outline%20Transport%20Strategy%202023.pdf>

³³ <https://friendsofcarringtonmoss.com/2022/03/04/a-biased-and-misleading-option-appraisal/>

³⁴ <https://friendsofcarringtonmoss.com/wp-content/uploads/2020/09/200228-letter-to-tmhc-ceo-re-crr-1.pdf>

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- Decision-makers should be able to provide evidence that they took consultation responses into account – this is not available in the planning application documentation (see our summary of the 2025 Consultation responses below).
- In addition, as mentioned above, in relation to the Preliminary Options Appraisal Report, Natural England raised a number of issues about the misrepresentation, inaccuracy and harms due to the unbalanced approach taken to the Option Appraisal and advised that a full Environmental Scoping Report should be produced in advance of the decision about the preferred route option – this advice was completely ignored. An assessment comparing the environmental issues of both options is still needed.
- In relation to the public engagement exercise, the Friends group, representatives from local Parish Councils and other community groups, met with members of the Carrington Relief Road project team on 8th March 2021 to review the priority questions³⁵. No responses were available at the meeting. The questions raised were not included in the Executive report mentioned above and are not included in the appendices to Part1 (Statement of Community Involvement, document 1535813).
- Whilst the consultation in 2025 was the first public consultation specifically about the CRR, there has been repeated feedback from a number of stakeholders, including Friends of Carrington Moss, setting out community preferences for alternative, more sustainable options (see below).
- Planning application document Part1 (1535813), gives details of the consultation process but does not show how resident comments were given conscientious consideration, especially given that almost 77% of the 751 respondents confirmed that they do **not** support the proposed road scheme.

As set out in the examples above, Trafford's approach of not engaging at the formative stage of the proposal, dismissing requests for sustainable transport options from their communities, ignoring the advice of expert bodies such as Natural England and disregarding the outcome of consultation responses means that the Gunning Principles have not been complied with.

2025 Consultation:

Planning application document Part1 (1535813), shows that the vast majority of local residents are not in favour of the road. The document provides the following information:

- 76.96% of respondents are not in favour of the road
- 61.52% of respondents are not in favour of the active travel measures
- 59.39% of respondents are not in favour of the proposed environmental improvements
- 49.8% of respondents are not in favour of the proposed equestrian facilities
- 49.8% of respondents are not in favour of the proposed ponds and community facilities.

In addition, residents raised a huge number of issues of concern in relation to the Carrington Relief Road, with:

- 79.4% of respondents concerned about flooding
- 78.05% of respondents concerned about the loss of green space

³⁵ <https://friendsofcarringtonmoss.com/wp-content/uploads/2021/03/210308-initial-engagement-focm-questions.pdf>

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- 78.05% of respondents concerned about the impact on wildlife
- 72.76% of respondents concerned about the traffic impact
- 67.07% of respondents concerned about air quality
- 56.23% of respondents concerned about the impact on public rights of way
- 54.47% of respondents concerned about construction traffic and disruption
- 43.9% of respondents concerned about construction noise.

Only 6.91% of respondents had no concerns about the scheme.

The documentation does not show how these concerns have been addressed, particularly as, for example, the number of attenuation ponds to address surface water capture has been reduced from 4 to 3 in this latest iteration of the documentation and that figures 6.1 and 6.2 from the Transport Assessment Report 15357381 explicitly show that, despite excluding huge volumes of anticipated trips, traffic will significantly increase along the east and west-bound A6144 through Partington and Warburton and through Sale West and Ashton on Mersey, causing more congestion, more pollution and more traffic incidents.

More Sustainable Alternative Options

**Quote from Lewis Mumford
(famous American urban planner, New Yorker, 1955.):
“Adding car lanes to deal with traffic congestion is like
loosening your belt to cure obesity”.**

In summary, Trafford’s proposal for the eastern part of the scheme will:

- Encourage more through traffic into the area, drastically affecting areas adjacent to the east and west-bound A6144 (as set out in figures 6.1 and 6.2 of the Transport Assessment) with huge increases to congestion, pollutions and accident levels, that will affect the financial, mental and physical health and wellbeing of local residents
- Introduce a speed limit of 40mph, which is likely to increase the number of serious incidents (given the traffic volumes and the presence of wildlife, deer, horses and hazardous materials)
- Destroy the habitats of numerous red listed birds and endangered wildlife, permanently eradicate productive Grade 2 agricultural land (affecting the livelihood of local farmers), fell hundreds of trees, put 100’s of homes at a greater risk of flooding, impact the hydrology of the area (damaging the restorable and irreplaceable 335 hectare peat moss).

The alternative proposed by communities, which would meet policy requirements and would deliver the transport enhancements needed in this area, comprises:

- Retain the opening of the A1 route to general traffic (to support traffic reductions in Carrington Village)
- Amend the A1 design at Isherwood Road (to redirect the traffic and pollution away from homes)
- Amend the design of the road to reconnect with the A6144 via a short north-eastern link that considerably reduces the land-take and harms to rural businesses, users of active travel routes and ecological assets

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- Upgrade existing active travel routes across the moss (ensuring surfaces are suitable for horse riders and lighting is sensitive to wildlife)
- Improve existing local roads (A6144 and Sinderland Lane), including addressing the potholes
- More rapid investment in local bus service improvements
- Exploration of more sustainable transport options, particularly reopening the former railway line, with genuine feasibility studies for the phased approach to maximum benefits and a clear understanding of all local options (including rail and water-based sustainable freight options).

The benefits delivered by the alternative include:

- Enabling the New Carrington allocation to deliver anticipated housing and employment, whilst achieving policy compliance and minimising environmental and ecological harms
- Discouraging through traffic, travelling between motorways, removing the potential for the road to become a rat run and reducing the health impacts of pollutions
- Encouraging modal shift to walking, cycling and wheeling (which will be far more pleasant, safe and healthy than being next to a major road, with thousands of cars and hundreds of HGVs hurtling along it every hour, discharging huge levels of PM_{2.5}s that will affect the health and wellbeing of all active travel users)
- Enhancing environmental and ecological assets
- Maintaining the current low traffic accident rate
- Reducing the costs to the public purse - no increased costs to the NHS and the emergency services, including for pollution related conditions, mental and physical health needs and supporting the outcome of traffic incidents.

Communities have also considered the potential for sustainable freight transport options, given the huge volume of HGVs on local roads. This is more challenging but pipelines, light and heavy rail and water-based options should be reviewed. We do, however, remain concerned that the changes to the Burford Bridge (mentioned in the Planning Statement, document 1535827, paragraph 4.11) are being made without consideration of the potential to support any future more sustainable freight transport options for Carrington.

The Planning Statement (document 1535827) appears to suggest that (paragraph 7.130) the road is needed to remove a 'major bottleneck' to facilitate development of the region. Such requirements should be addressed through improvements to sustainable passenger and freight transport options, not diverting motorway traffic through medieval villages on an unsuitable, unsustainable road network.

The paragraph continues by indicating that the current lack of connectivity and accessibility also constrains "*the extent to which Carrington can undergo its planned regeneration*" and asserts that Trafford's Planning department has confirmed that "*permission for the additional homes will not be granted unless the highway infrastructure can be sufficiently improved*". The eastern part of the CRR is not required to address this strategic intent and the alternative option meets this requirement.

Trafford has (including in this planning application) repeatedly failed to demonstrate that the more sustainable transport options are genuinely unachievable. If this road is being advanced as the most appropriate outcome, it is incumbent on the applicant to explain why alternative, more sustainable, options have been dismissed. Yet the submitted Transport Assessment does not demonstrate that non-road alternative options were tested in order to optimise sustainable travel outcomes.

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The ES Non-Technical Summary (document 1538053) states (paragraph 3.4.1) that the EIA regulations require the ES to include a description of the reasonable alternatives and an indication of the main reasons for selecting the chosen option. Whilst the Preliminary Options Appraisal has been included in this documentation, along with the Preferred Options Report, there is no consideration of the more sustainable solutions highlighted in Trafford's previous development plans.

The ES continues (3.4.2) with the trope that the CRR has been in the UDP since 2006. This is incorrect. Opening up the A1 route to general traffic was in Trafford's plans but so was the bridge over the Ship Canal, along with public transport improvements (including rail) but there is no reference to the reasons why these more sustainable alternatives have been dismissed by Trafford.

There are indications in the documentation itself that the road should not be the primary option considered. ES Chapter 14 Socio Economic and Human Health (document 1538080), for example, asserts (paragraph 14.7.23) that people are "*returning to public transport use post pandemic*". This would imply a reduction in car journeys and suggests the focus for investment should be on public transport, not on a road.

ES Chapter 14 Socio Economic and Human Health (document 1538080) incorrectly asserts (paragraph 14.7.88) that there are "*no alternative proposals to the delivery of the Proposed Development*". It is also not reasonable to assume (same paragraph) that the absence of the scheme would render the New Carrington allocation undeliverable.

There is a key reliance on the list of transport interventions set out in Appendix D of PfE. The alternative option, together with the public transport interventions would provide the necessary infrastructure to enable the allocation to be fully delivered.

Repeated community requests on this issue have been consistently ignored, yet delivery of such options is central to policy compliance. Ignoring these alternatives directly affects policy aims to encourage modal shift and reduce car/HGV dependency and will impact the overall success of the allocation as a coherent, sustainable location, rather than it just being a disconnected, collection of housing and warehousing parcels that are only accessible by road. There is no evidence, no comparative assessment nor is there a narrative explanation provided as to why a road is the most appropriate solution in policy terms.

The continued lack of (and decreasing) public transport options in the area (acknowledged by Trafford) have resulted in increased reliance on car trips for day-to-day needs and this solution is a missed opportunity to create a genuine, legible heart to the allocation, anchored by public transport. Although pedestrian and cycle routes are indicated within the planning application, the allocation is effectively being designed and principally organised around vehicular access.

Trafford is not mandating a car-light or car-reduced approach, public transport is not being prioritised, and car/HGV access will be the norm for the foreseeable future (as there is nothing in the GM Transport Strategy or Trafford's draft Local Plan to address the shortcomings of the current plans for the allocation area).

Instead, the evidence indicates that increasing volumes of car/HGV traffic has been treated as a fixed requirement, that lack of investment in public transport options will continue and that the opportunity to embed modal shift by upgrading existing traffic-free routes (rather than expecting active travel users to breathe in highly polluted air) has been missed.

For these reasons, the application conflicts with the strategic transport and sustainability objectives of national, regional and local development plans and other policies and further demonstrates why determination should not take place in advance of an adopted Masterplan which is capable of securing genuinely sustainable outcomes, alongside the environmental and ecological mitigation and compensation needed.

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Spending over £132m on an unsustainable road solution at a time when climate mitigation and nature's recovery are considered essential, is not policy compliant. Public funding should be focused on sustainable transport options, particularly given the opportunities for sustainable transport in the area. It would be practical, for example, to extend the tram network to Partington, as Network Rail considers the former railway line to still be live. With a little ambition, such a scheme could be developed in phases, starting with a guided bus route and progressing to a tram scheme. The Manchester Ship Canal could be used for freight transport, especially given the proposed developments at Port Salford. More (and more frequent) bus services could be introduced, school bus services could also be considered to reduce traffic during the peak periods.

Communities have long been calling for more sustainable transport options in the area, including the benefits of the bridge option (mentioned in the Core Strategy 2012) and the reopening the former railway line, repeating requests in consultation responses and other correspondence with the Council, and even presenting to both Trafford and Salford officers in 2020. A petition³⁶, signed by over 1,600 citizens, was also presented to Trafford Council in October 2021³⁷.

Options Appraisal

The Options Appraisal carried out in relation to the Carrington Relief Road was clearly not a genuine evaluation exercise.

The Planning Statement (document 1535827) reviews the Option Appraisal process. The Preferred Option Report was not an independent comparison of the two final options (Option A – upgrading the existing road network and Option F – putting the eastern part of the route across land that has extremely high natural capital and ecosystem services value).

The analysis for Option A was extremely prejudiced, and it was deliberately articulated as an impractical route, when this is not the case. The environmental and ecological implications of Option F were deliberately obfuscated. The appraisal appeared to have been written with a predetermined outcome in mind.

It should be noted that, in their response to the Preliminary Options Appraisal Report (document 1538688), Natural England, amongst other advice, made the following comments (our emphasis in bold):

- “*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*”. This advice was ignored and no such report was done in advance of the selection of the preferred route for the road and is still not available.
- “***Environmental constraints should be given appropriate weight*** when determining the preferred option”. This advice was ignored and the most environmentally damaging route was chosen for the road scheme.
- “*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*”. This demonstrates the bias in the approach to the options appraisal.

³⁶ <https://friendsofcarringtonmoss.com/wp-content/uploads/2021/10/210811-petition-cover-page.pdf>

³⁷ <https://democratic.trafford.gov.uk/documents/s40950/Petition%20Response%20Notice%2013.10.21%20No%20Roads%20Across%20Carrington%20Moss.pdf>

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- “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**”. Again, this demonstrates the bias in the approach to the options appraisal.

We provided detailed analyses³⁸ of the CRR report for Trafford’s Executive Committee³⁹ (Monday 27th September 2021) and of the Preferred Options Report⁴⁰.

We and other community groups fed back to Trafford in response to the public engagement exercise (as mentioned in the Gunning Principles section). One of the points we raised was that we believed improvements could be made to the design of Option A. We asked how our suggestions could be fed into the process. We highlighted that our ideas for improvement would reduce the impact of land ownership issues and would significantly reduce traffic disruption during construction. We received no response to this or any of our other questions.

Given the feedback from Natural England and Community Groups, it is totally incorrect to suggest that (paragraph 7.96) cost was “*the only criteria which favoured Option A*”. In addition, the Preferred Options Appraisal report (document 1538831) highlights (page 43) that “*Option F requires 2.5 times more water storage than Option A*” (and we believe this is an underestimate of the water storage requirement).

The statement at paragraph 7.96 is both misleading and disingenuous. The Executive decision to select Option F as the preferred route for the CRR should be reviewed, especially given the feedback received in relation to the recent community consultation, which confirmed that 77% of respondents were not in favour of the CRR.

The suggestion that Option F minimises harm to the Green Belt is no longer relevant given the government’s introduction of Grey Belt designation. It is also totally incorrect for the paragraph to suggest that there is a lack of alternative (non-Green Belt) options. The Very Special Circumstances set out in paragraph 153 of the NPPF are, therefore, not met.

Traffic and Transport Issues

The Transport Assessment Report (document 1537381) suggests (paragraph 8.1.29) that “*The benefits of the CRR are wide-ranging. It will significantly reduce congestion on the A6144, particularly at key junctions such as Flixton Road and Carrington Spur, which currently operate at or above capacity during peak periods*”. We disagree. Despite excluding much of the anticipated traffic volumes, the documentation itself acknowledges that junctions will operate near to capacity within 15 years and figures 6.1 and 6.2 demonstrate that the east and west-bound A6144 will be affected by significant increases in traffic and, therefore, congestion (and pollutions).

We set out in the paragraphs below the use of outdated and flawed data in the assessment model, the exclusions in the estimated traffic volumes, and inappropriate comparator sites.

The benefits set out in the Planning Statement (document 1535827), paragraphs 7.109 to 7.112 are based on unproven assumptions leading to highly aspirational outcomes. The suggestion that the road will result in improved links between communities (paragraph 7.122) is incorrect due to the huge levels of induced traffic, increased pollution and the potential for increased collisions. We disagree that there are Very Special Circumstances`, as set out in paragraph 153 of the NPPF.

³⁸ <https://friendsofcarringtonmoss.com/2021/09/23/what-does-traffords-latest-report-about-the-carrington-relief-road-crr-mean-for-affected-residents/>

³⁹ <https://democratic.trafford.gov.uk/documents/s40381/CRR%20Exec%20Report%20Sept%2021.pdf>

⁴⁰ <https://friendsofcarringtonmoss.com/2022/03/04/a-biased-and-misleading-option-appraisal/>

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The suggestion (Planning Statement, document 1535827, paragraph 7.81) that the route will divert through traffic and HGVs away from residential areas and will enhance the quality of life for local residents is absolute nonsense. The documentation should make it clear that this statement refers **ONLY** to Carrington Village and should be honest that there is no guarantee that either private cars or HGVs will use the new route.

For other communities, there will be a surge in through traffic due to the acknowledged increase in vehicles drawn onto the route to travel between motorways. There will also be huge increases in HGVs due to the developments that will be constructed if this road scheme is approved. Residents living near Isherwood Road, for example, and adjacent to the Banky Lane junction will be extensively impacted by the scheme, particularly by the impact of extreme increases in pollutants, increases in congestion and in traffic incidents.

Furthermore, residents on the A6144 route outside of the scheme boundary will be significantly impacted by the induced traffic caused by this scheme. The quality of life, and the health and wellbeing of the vast majority of affected local residents will considerably deteriorate explicitly due to the harms caused by this scheme.

The Transport Assessment Report (document 1537381) suggests (paragraph 8.1.12) that the New Carrington Outline Transport Strategy (2023) has a long-term vision for sustainable transport. If that was the case more sustainable transport options would be prominent in the strategic vision. The paragraph suggests that the strategy *“aims to create a new, sustainable community by reconfiguring transport infrastructure, encouraging active travel, expanding public transport, and reducing carbon emissions”*. None of these aims will be delivered by this scheme.

Absurdly, paragraph 8.1.13 tries to explain how the CRR contributes to these aims by suggesting that it will enable *“essential motor vehicle access while supporting a shift in travel behaviours through improved freight access, ensuring that logistics operations can be conducted efficiently and safely without conflicting with other modes of travel”*. This is patently untrue. There is no improved freight access, HGVs will travel along the same routes as other vehicles and, on the eastern part of the scheme will need to be vigilant for wildlife on the road.

More sustainable transport options would facilitate Trafford's growth agenda in a way that does comply with policy, including reducing carbon emissions and pollutants. The alternative option, promoted by local communities, will also reduce the volume of induced traffic, genuinely promote public transport improvements and encourage uptake of active travel options, alongside huge reductions in the environmental harms to be caused by this scheme.

The CRR does not represent a *“forward-looking solution to current transport issues and a foundation for long-term economic and community development* (Planning Statement, paragraph 7.75), it continues the current car/HGV dependent and dominated development. The alternative option promoted by communities would provide that futureproofing.

ES Chapter 14 Socio Economic and Human Health (document 1538080) did not challenge the assertion that the proposed development does not in itself generate traffic flows and does not consider the government's introduction of Grey Belt designation. This has resulted in a flawed assessment of the economic, social and health impacts of the scheme.

It will not result in *“quicker journey times for personal vehicles”* or the *“more efficient and reliable functioning of public transport”*. It replaces a tiny proportion of the route of journeys along the A6144. It will not *“significantly reduce congestion on the A6144”* (paragraph 7.78), or *“serve as a vital alternative to the heavily congested A6144”* (paragraph 7.77). Traffic coming from Partington, for example, will have to turn right onto the A1 route. This will lead to more congestion in Partington and will mean that most vehicles will continue through Carrington Village, rather than waiting to turn right.

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Traffic heading to Ashton on Mersey will become more congested (as shown in figures 6.1 and 6.2 of the Transport Assessment Report 15357381) as drivers are expected to use this route rather than the A56.

The information set out in ES Volume 3 Appendix 14-2, Journey Time Data (document 1538655) is flawed as it provides comparison journey times to and from key destinations that are outside the control of this scheme. There is also no reference to the comparable wait times to access the Carrington Relief Road from Partington.

As discussed in the section above, the scheme will also not reduce safety issues.

The Planning Statement (document 1535827) confirms that Carrington is not considered a sustainable location and (paragraph 7.66) that the local road network and key junctions are “*operating at capacity*” during peak periods. What it fails to acknowledge is that this is a common trait in traffic routes nationwide and beyond, and that, whilst it suffers from congestion at peak times, it typically operates within capacity at other times of the day (unless there is a traffic incident), again in common with other road networks.

The document suggests that the road is critical to achieving the desired substantial development outcomes. We disagree. Sustainable development in New Carrington requires a focus on sustainable passenger and freight transport, active travel, provision of local amenities and environmental/ecological improvements, not an unsustainable road scheme that does not meet local, regional or national development policy requirements.

Trafford’s lack of ambition in relation to its own Core Strategy aims, over the past more than 10 years, is not a reason to approve an unsustainable solution that will be very harmful to local communities and natural capital assets.

The Transport Assessment Report (document 1537381) suggests (paragraph 8.1.3) that the CRR facilitates “*more efficient travel, reducing congestion and encouraging people to use active travel and public transportation instead of private cars*”. This is incorrect. Walking, cycling and horse riding adjacent to over 30,000 vehicles a day, many of which are HGVs, will not be safe, pleasant or healthy. The pollution levels alone will discourage active travel users. Congestion (including along the east and west-bound A6144) will not be reduced due to the huge levels of induced traffic, affecting all surrounding communities.

The only beneficiaries of this road will be the developers and those people who will, as set out in the documentation, use it as a rat-run between the M60 and the M6.

We disagree that there are any grounds to conclude that (Planning Statement, document 1535827, paragraph 7.82) “*this transport necessity constitutes a Very Special Circumstances, as set out in paragraph 153 of the NPPF*”. The alternative option would bring more benefits, fewer harms and genuine increases in quality of life for residents, and for users of the existing active travel routes across the moss.

Approach to Assessment

The approach to analysing the transport effects of the Carrington Relief Road ‘Transport Assessment Scope for CRR Planning Application’ (mentioned in the Transport Assessment Report, document 1537381, paragraph 5.1.1) is not available in the planning application documentation. We have requested access to it.

We are concerned by the statement in the Transport Assessment Report (document 1537381), paragraph 5.2.4, which suggests (our emphasis in bold) that “*PfE ‘scheme dependent’ development-generated trips are excluded*” and that “*Induced trips and travel mode shift, associated with behavioural responses to changing journey costs caused by the CRR are excluded*” from the SATURN model, which is used to predict traffic movements on the CRR and within its area of influence, in 2030 and 2045.

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We are also confused by the statement (paragraph 5.2.3) which suggests that “*Impacts of the CRR-Only scheme are determined by comparison against a ‘business as usual’ situation, without the scheme in place, but with the same level of travel demand on the road network*”. There would not be the same level of travel demand on the road network **without** the eastern part of the scheme as there would be with the scheme, due to the induced traffic to be drawn from the motorways and other parts of the road network.

The Planning Statement (document 1535827) suggests (paragraph 7.73) that the Transport Assessment is “*based on a robust modelling approach to evaluate its transport impacts*”. Yet the applicant places significant reliance on very out-dated information, as highlighted in the Transport Assessment Report (document 1537381), paragraph 5.2.7, which states “*Land use trip rates are taken from the transport assessment which supported the TfGM project ‘Trafford Park Metrolink The Transport for Greater Manchester (Light Rapid Transit System) (Trafford Park Extension) Order’ 2014*”.

The assessment also uses data collected in September 2023 for a specific development in the brownfield part of Carrington (Voltage Park 2), as set out in the Transport Assessment Report (document 1537381), paragraph 3.4.21.

It seems that the assessment also adjusted trip rates to “*reflect Trafford Council’s commitment to achieving a higher proportion of non-vehicle use*” (Transport Assessment, document 1537381, paragraph 5.2.8). Inconsistently, it explicitly **excludes** the CRR+ package of supporting transport schemes needed to enable full PfE development (paragraph 5.2.4). It seems only “*Normal ‘background’ growth, plus (minimum) ‘deadweight’ development-generated trips*” are included in the model.

The Transport Assessment (paragraph 8.2.2) confirms that the CRR “*is not designed to transport all trips generated by PfE, as this would be unsustainable, encouraging too many people to drive, contrary to GMCA and TC commitments*”. The paragraph confirms that the broader CRR+ sustainable transport package is needed to enable all travel movements generated by PfE but that there will need to be controls and incentives to ensure more sustainable travel choices are made. No such controls or incentives are provided by this scheme and there is no committed funding for the sustainable transport package.

The assessment also uses inappropriate comparator sites, which we mention further below. Transport Assessment (document 1537381), paragraph 5.2.9, showing a double impact of the trip rates mentioned above plus a further adjustment to ‘deadweight’ developments to reflect more sustainable travel behaviour from sites that already have direct access to train services (with enhanced services planned). This suggests that the model does not reflect either reality or expectations, nor does it provide the assessment needed to fully understand the impact of this scheme.

Despite these issues and exclusions, figures 6.1 and 6.2 show that traffic will cause increased congestion on a number of roads and junctions outside of the scheme boundary.

Bizarrely, the Transport Assessment (paragraph 6.4.1) suggests that the “*operational assessment has illustrated the wider impact of the scheme, in SATURN, to be beneficial in terms of re-routing traffic onto major roads and away from less suitable routes*”. Figures 6.1 and 6.2 show explicitly that traffic will be drawn from the motorways, and re-routed through villages, increasing congestion, pollution and accidents.

Traffic Volumes

As mentioned above, and contrary to the NPPF, PfE, and other policy requirements, the Transport Assessment does not appear to model a scenario in which car ownership or trip rates are materially reduced to achieve the desired ‘Right Mix’ Vision, nor the required radical reduction in carbon emissions.

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The approach set out in this planning application effectively assumes continued car/HGV dependent and dominated travel options and then designs the scheme to accommodate it, rather than recommending alternatives to reduce traffic in accordance with development plan policy.

The Transport Assessment Report (document 1537381) states (paragraph 1.3.2) that *“As the proposal is a road which does not in itself generate traffic flows, a ‘sister’ Travel Plan has not been produced, as would be the case with a development that is predicted to generate material levels of traffic”*. This is an astounding given the evidence (footnotes above), available for decades, that new road capacity **does** generate additional traffic flows.

Planning Practice Guidance⁴¹ requires the assessment of capacity to provide a classified count of HGV numbers, *“where there is known to be a significant level of heavy goods vehicles traffic”*. This has not been provided within the planning application and has affected a number of assessments within the Environmental Statement, including the air, noise, light, vibration, dust and water pollution, all of which are severely impacted by high levels of HGV transport.

We disagree that a Sustainable Transit-Oriented Development approach has been adopted in either the New Carrington Masterplanning to date or the Outline Transport Strategy (paragraph 2.4.9). The prioritisation of 4 major new roads in the New Carrington development means that new housing and employment spaces will be car/HGV dependent and dominated development, not sustainable passenger and freight transport oriented development. The lack of local amenities, available today and planned for the future, including schools, retail, and health services, mean that few journeys for Partington residents, for example, are short enough to be completed via non-car trips. In addition, the variety of employment opportunities in New Carrington is very limited, meaning that many job seekers look further afield for appropriate roles.

Whilst ES Chapter 14 Socio Economic and Human Health (document 1538080), for example, suggests (paragraph 14.7.25) that *“there is capacity at primary and secondary schools across Trafford”*, it does not take into account how far pupils have to travel and how they get there.

The same document (paragraph 14.7.31) omits the same information in relation to GPs (it does not mention dentists or mental health/secondary care services), despite the huge increases in pollutants causing additional pressures on existing health services. Furthermore, as mentioned above, the approval of this road will create Grey Belt that will result in additional development proposals. This will trigger the need for more amenities, which residents will have to travel to.

Whilst the Outline Transport Strategy (page 11) highlights that the *“Greater Manchester Transport Strategy 2040 (GMTS 2040) sets out its ambition for the ‘Right Mix’ of transport modes, which is for 50% of all journeys in GM to be made by sustainable modes, with no increase in motor vehicle traffic by 2040”*, the New Carrington strategy does not seek to support that aim.

The Environmental Statement Transport Assessment (document 1538703) highlights (paragraph 2.4.12), from the Outline Transport Strategy, that *“the most ambitious, realistic and achievable outcome would be intermediate ‘Scenario 2”*, which results in (2.4.13) *“a 74% car mode share was envisioned with 26% non-car”*.

That the largest allocation within PfE will not achieve the ambitions of the GMTS 2040 is astounding and will have a material impact on the goals (50% of all journeys in GM to be made by sustainable modes, no increase in motor vehicle traffic by 2040) being attained.

⁴¹ <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>

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The Environmental Statement Transport Assessment also highlighted (paragraph 2.4.13), from the Outline Transport Strategy, that the proportion of internal journeys, remaining wholly within New Carrington will be 17%. This is highly unlikely given the lack of amenities mentioned above.

In addition, this figure has been derived from what is described in the Outline Transport Strategy as a comparable benchmark site, Waterbeach, 10km north of Cambridge. Like the other 'comparable' sites mentioned in the Outline Transport Strategy, Waterbeach is an unreasonable and irrational comparator site. It already has a railway station that provides short and long distance journeys, and a new station is planned to support and serve proposed new developments. Other so-called comparable sites include Filton and Stoke Gifford in South Gloucester, which are considered to be key railway hubs and this area is benefiting from major rail infrastructure investment. Bradley Stoke is served by two railway stations, one of which is Patchway.

As there are no proposals in the current or draft Local Plans, nor in the current or draft GMTS, to provide rail transport links for New Carrington, we do not believe these can be considered comparable benchmark sites from a transport perspective.

The Transport Assessment Report (document 1537381) highlights (paragraphs 3.4.29, 3.4.42) that the key junctions (Isherwood Road and Banky Lane) both operate "*with limited spare capacity in the peak periods with little to no spare capacity to accommodate additional traffic demands*". Yet the eastern part of the proposed scheme will encourage huge volumes of induced traffic to use the route, drawing vehicles from the motorways onto the CRR, negating the proposed mitigations at Banky Lane, exacerbating the existing junction issues and significantly reducing the lifespan of the scheme.

Despite the exclusion of much of the anticipated traffic from the data, the outcome of a decision to proceed with the eastern part of the scheme will see (paragraph 6.3.22) that the Banky Lane junction "*is predicted to operate near its design capacity in the Morning Peak period in 2030*" and (paragraph 6.3.24) in 2045. A similar situation is predicted for the Isherwood Road junction.

Public Transport

The Planning Statement (document 1535827) recognises (paragraph 7.71) that public transport provision is lacking. Yet this scheme does not provide improvements to public transport provision. The paragraph confirms that residents are "*forced*" to rely heavily on private cars, "*contributing to congestion and undermining efforts to promote sustainable transport*". This scheme does not change that situation, it undermines local, regional and national policies to secure modal shift. In addition, due to the induced traffic being 'drawn' onto the route to travel between motorways, the current congestion will be considerably worsened if the eastern part of this scheme is approved.

The Transport Assessment (document 1537381) suggests (paragraph 8.1.31) that the scheme will "*improve journey reliability and support more sustainable travel choices, including walking, cycling, and public transport*". This is not credible for the reasons set out above, and there are a number of extremely misleading statements about public transport improvements throughout the documentation.

As an example, the Transport Assessment (document 1537381) suggests (paragraph 8.1.27) "*The road will also support improved public transport access, enabling better bus connectivity across the New Carrington site and beyond*". How does it achieve this? Bus services will need to go through residential areas, not bypass them.

The Planning Statement (document 1535827) suggests (paragraph 7.107) that the scheme will "*indirectly allow for a more reliable and consistent bus service along the A6144 as a result of a reduced traffic flow*".

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This scheme purports to provide benefits to a very small part of any bus route (the A6144 through Carrington Village). It cannot influence what happens elsewhere. As mentioned above, the east and west-bound A6144 will be significantly affected by huge increases in traffic, congestion and traffic incidents. Bus services will, therefore, be less reliable as a consequence of this scheme.

Paragraph 7.107 continues “*This would create more favourable conditions for the introduction of improved bus services in the wider Carrington area*”. What are these more favourable conditions? Increased public transport services for Carrington, Partington, Sale West and Warburton have been included in previous local plans (2006 and 2012) and none have been delivered. In fact, bus services have been considerably depleted in these areas over the past 10 years. There is currently no committed funding for improved bus services.

Active Travel

We have long supported the opening up of the A1 route to local traffic and we are supportive of the active travel improvements provided on that part of the scheme. It should be noted, however, that this scheme does not provide wider improvements to active travel routes (either across Carrington Moss or on the east or west-bound A6144). This means that the active travel network will remain disjointed due to the focus of investment in the road.

The Planning Statement (paragraph 7.70) suggests that active travel provision is currently inadequate. Yet this scheme does not improve the areas where walking and cycling routes are non-existent (such as along the A6144 mentioned above) and it fractures those that are well-used (such as the recorded and unrecorded public rights of way across Carrington Moss), replacing them with facilities that are not as healthy, not as safe and not as pleasant as the current routes.

The CRR ES WCHR Report Updated (document 1538731) recognises how well used the existing active travel network across Carrington Moss is (and it should be noted that these routes are even busier at weekends and during school holidays). The lack of investment in improvements to existing active travel provision is very disappointing and means that there are many missed opportunities to encourage faster, more permanent modal shift.

The Friends of Carrington Moss fully support the response submitted by the British Horse Society and the comments from many horse riders about the need to improve access for equestrians, given that there are over 1,000 horses stabled on and around Carrington Moss.

It is clear that the Amey team has recorded much of the feedback from active travel users, including horse riders, but it seems that there has been no desire to give them conscientious consideration (as required by the Gunning Principles). These included, for example, facilities to support disabled riders, those with special educational needs, appropriate surfacing for horses, priority for active travel users (as required by the UK Highway Code 2025), access to green spaces for horse riders, and more safety features for horse riders, including in relation to all the crossings.

There are also indications in the WCHR report that horse riders have not been given the same consideration as other active travel users (the Background paragraph, page 7, for example, mentions improvements to the streetscape for only cyclists and walkers, and the enhanced connectivity, top of page 10 also only considers cyclists and walkers).

The document (page 13) highlights that a separate scheme will be developed by Trafford Council to address walking and cycling improvements through Carrington Village. The Opportunity paragraph mentions that horse riders could benefit but this is not mentioned in the Current Position paragraph. There is no mention of other improvements that may benefit horse riders such as alongside Isherwood Road, or alongside the A6144 between Isherwood Road and Banky Lane. Safe, off-road routes are needed.

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The PROW Proposed (document 1535792) suggests that Restricted Byway RB23 will be maintained and will accommodate all existing legal users but that no formal crossing is proposed. Instead, the plan is to leave gaps in the fencing and provide ramped access slopes on either side of the relief road. This is a very dangerous solution and leaves the route extremely unsafe for all users. Horse riders and other users are expected to cross the Relief Road here without any safety measures in place. This could lead to horses, deer and other wildlife having access to the CRR.

The challenges for horses, cyclists and walkers passing the National Grid part of Restricted Byway 1 is noted but there are no plans to improve this currently extremely unsafe route.

It should also be mentioned that there are also no guarantees that motorists will use the new road if it is more convenient to continue to use the existing route. This significantly reduces the likelihood of benefits for active travel users.

Air Pollution

We are very concerned that the assessment (ES Chapter 5 Air Quality Updated 1545733 paragraphs 5.11.2 and 5.11.3) found no significant effects of air pollution on either human or ecological receptors either during the construction or operation of this road (assuming the mitigation measures set out in the documentation are followed). We do not believe the full impact of air pollution has been considered, both for the traffic caused by this road but also the cumulative impact when all proposed developments in New Carrington are taken into account.

It is very surprising that document 1538080 (ES Chapter 14 Socio Economic and Human Health, paragraph 14.7.69) suggests “*the study area is between the 5th and the 9th worst performing deciles for air quality nationally*” when the eastern part of the route currently suffers from very little air pollution due to the lack of motor vehicle traffic using its numerous active travel routes. As Trafford and Amey are aware, Friends of Carrington Moss has undertaken air quality monitoring (NO₂) in the area, those results are available on request.

Health impacts of Air Pollution

It is astounding that huge levels of traffic can be “*drawn from*” the M60, the M6, the M56, the A56 and other roads, along with the additional traffic due to new developments and the additional journeys that would not have taken place without the road, causing congestion, and yet, the impact of pollutants will be ‘insignificant’!

It certainly will not be insignificant for the vulnerable communities at either side of the scheme. Trafford’s Health Inequalities Data Report (2022)⁴² confirms that those who present at Partington GP practices include:

- Asthma prevalence (9.83% and 9.08%) - significantly higher than England (6.38%) and GM (6.88%) averages
- COPD prevalence (4.5% and 4.23%) - much higher than England (1.93%) and GM (2.34%) averages
- Cardiovascular Disease prevalence is higher (2.37%) in one surgery, compared to the England (1.19%) and GM (1.16%) averages (Hypertension also has a higher prevalence at both surgeries).

This suggests that air pollution could already be a factor in health issues for Partington residents.

⁴² <https://gmpcb.org.uk/wp-content/uploads/Trafford-West-Inequalities-Data-Report-May-2022.pdf>

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Figures 6.1 and 6.2 (from the Transport Assessment Report 15357381) explicitly show that traffic will significantly increase along the east and west-bound A6144, causing more congestion, more pollution and more traffic incidents. Traffic will also significantly increase through the employment zone (A1 route) and, of course, across what are currently traffic-free fields.

The ES Chapter 14 Socio Economic and Human Health (document 1538080) suggests (paragraph 14.8.69) that any change in the prevalence of Cardio-Respiratory Conditions will be temporary. This is incorrect. The traffic levels, dust, congestion, and pollutants will permanently increase the risks, particularly for vulnerable residents. Those living close to junctions, such as at Isherwood Road and Banky Lane are likely to suffer significant adverse effects of pollutants.

Active travel users, including horse riders, will be severely affected by emissions both during construction and once the road is in operation. Current recorded and unrecorded public rights of way will be significantly affected because there is almost zero motor vehicle traffic on those routes today.

At the same time, figures 6.1 and 6.2 show that traffic will significantly decrease on the M60, the M6, the M56, the A56 and other roads (shown by the thickness of the green bands). This means that, in approving this road, inequalities will increase as deprived communities, without access to a car, will have their health outcomes severely harmed, whilst those living elsewhere will have their health outcomes improved.

Despite confirmation that “*concentrations of pollutants are not reducing as quickly as predicted by Defra*” (document 1545733 paragraph 5.4.17), it does not appear that local monitoring of existing PM_{2.5} and PM₁₀ has actually taken place along the A6144 in Carrington, Partington, Sale West and Warburton.

Paragraph 5.4.15 suggests that the PM_{2.5} modelling results were ‘negligible’. We would like more clarity about these results because the sheer number of cars and HGVs, including huge volumes of traffic induced into the area by the scheme, would suggest that PM_{2.5} results would be much more than ‘negligible’.

PM_{2.5} levels will be particularly harmful around junctions, where cars and HGVs are slowing down, or speeding up, causing PM_{2.5} emissions from tyre and brake wear, as well as exhausts. We are aware, for example, that the Trafford Green Hydrogen development will result in an additional 700 HGV movements a day, with more from Voltage Park and other approved developments in the area.

Dismissive references to ‘Annual Means’ and ‘exceedances’ does not mean that local residents will not be affected by the significant health impacts of air pollution. No assessment of vulnerable residents appears to have been conducted, including in relation to children on journeys to and from schools.

Paragraph 5.4.12 suggests that the need for “*a quantitative assessment of vehicle emissions during construction has been screened out of further assessment*” due to traffic numbers but this does not take into consideration the cumulative impact of all construction in the area at this time.

There are no ‘safe’ levels of PM_{2.5} emissions. Repeated tropes about the benefits of the proposed introduction of active travel routes are, therefore, meaningless. Walking or cycling adjacent to a major road, which has a minimum of 30,000 cars and over 3,000 HGVs a day travelling along it will not be healthy, safe or pleasant. Just breathing in the PM_{2.5} emissions alone will cause significant increases in respiratory-related health incidents.

With particulate matter lodging itself in various organs, research explains that air pollution has been linked to many health problems, far beyond the lungs, including in the brain and for babies still in the womb. At the other end of life, components of air pollution also seem to be ‘accelerating the process’ of dementia.

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The Full Business Case should, therefore, include the costs associated with the additional health services requirements associated with the road, including in relation to the huge increase in pollutants. This will lead to more GP and hospital appointments due to, for example, more residents seeking support for respiratory and cardiovascular conditions.

A recent study related to improvements to air quality in the Bradford Clean Air Zone⁴³ found that air pollution was a contributing factor for 35% of GP visits for breathing issues and 49% of A&E visits for conditions including asthma and chronic obstructive pulmonary disease. The introduction of the clean air zone resulted in a drop of almost 600 GP appointments a month, including 134 fewer GP visits a month for people with problems with their cardiovascular health.

The seriousness of air pollution related health problems has been highlighted in this recent article⁴⁴, which confirms dirty air harms the organs in our body, affecting blood vessels, making heart attacks and strokes more likely. Inflammation in the lungs has caused deadly tumours, with around one in 10 lung cancers thought to be caused by air pollution in the UK. A report by the Royal College of Physicians estimates there are around 30,000 deaths a year attributable to air pollution.

Air pollution also affects ecological sites, yet the impact on these was also dismissed as 'not significant' (assuming mitigation measures are implemented). Again, we are concerned that the traffic numbers need to be revisited and the cumulative impact of all construction in the area does not appear to have been taken into account.

As there is no separate count of HGV traffic, as required by PPG, there is no indication of whether the anticipated increase in HGV numbers (and the associated increase in emissions) has been taken into consideration.

The impact of air pollution (and other health impacts) appears to be consistently devalued in the various documents. The ES Chapter 14 Socio Economic and Human Health (document 1538080), for example, states (paragraph 14.8.84) that the impact of air pollution on users of sports facilities is 'not significant'. Yet recent research (Air Pollution and Its Impact on Health and Performance in Football Players⁴⁵) suggests that *"Even short-term spikes in air pollution have been shown to impair performance, increase respiratory symptoms, and delay recovery in athletes"*.

Holcroft Moss

The Environmental Statement (ES) should have challenged the assertion in the Transport Assessment that the road will not generate additional traffic. As mentioned above, the phenomenon of induced traffic has been well understood for decades and is acknowledged in government reports in relation to building new roads. It should also have questioned the exclusion of traffic that is expected to use the route.

Given the anticipated volume of HGV traffic, the ES should also have challenged the lack of a Travel Plan that separately counted the predicted HGV numbers, as required by PPG.

The absence of these challenges has meant that the ES has not taken the full implications of traffic which will use the road into consideration when assessing the impact on both human and wildlife health and conservation areas.

⁴³ <https://www.bbc.co.uk/news/articles/clyx6jwww53o>

⁴⁴ <https://www.bbc.co.uk/news/articles/c74w48d8epgo>

⁴⁵ <https://pmc.ncbi.nlm.nih.gov/articles/PMC12197153/>

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ES Chapter 5 Air Quality Updated (document 1545733) inexplicably suggests (paragraph 5.4.9) that there is expected to be “a net reduction in vehicles and HGVs/day as a result of the Proposed Development” and that, as a consequence, the scheme is “predicted to contribute to an improvement in air quality in and around Holcroft Moss”. This environmental claim should be substantiated, as required by the Green Claims Code, as the Trafford Green Hydrogen development alone will increase traffic by over 700 HGVs a day.

It should be noted that HGVs are unlikely to use the minor routes through Partington, Warburton and Lymm to the M6, due to road restrictions. It is, therefore, unlikely that the assertion at paragraph 5.4.56 is correct. This road will not result in a reduction of HGV traffic past Holcroft Moss or Rixton Clay Pits. HGVs are highly unlikely to be making short, local journeys. Again, this environmental claim should be substantiated.

Other Pollution and Health Issues

The road will also cause financial, mental and physical health issues as a consequence of other pollutants and an increased risk of flooding.

The Planning Statement (document 1535827) highlights (paragraph 8.84) that there are no anticipated significant noise or vibration effects during construction but that there are significant noise effects during operation, at a small number of receptors, for which mitigation or compensation payments may be offered. We do not believe the assessment has identified all the properties that will suffer from significant noise or vibration effects as a direct consequence of this road scheme. Those who live near to the Banky Lane junction will be directly affected and should also be compensated.

The statement (8.85) that the “448 sensitive receptors (25% of those within the study area)” are predicted to have beneficial changes in noise level must be substantiated. Whilst we recognise there is an expectation that Carrington Village will see a reduction in traffic, this is not guaranteed and many local residents in Sale West, Ashton on Mersey, other parts of Carrington, in Partington and in Warburton, will see huge increases in traffic as a consequence of this road (as confirmed in figures 6.1 and 6.2 in the Transport Assessment).

We disagree that 200 HGVs a day during construction is insignificant. We take school children for site visits onto the public rights of way across the moss. One of the exercises we do is to listen to traffic noise near Banky Lane (or other starting locations) and then listen again once we are on the moss. There is very little traffic noise and bird song is the primary sounds heard. Noise and vibration will significantly affect wildlife and bird species.

We believe users of the active travel network on and across Carrington Moss will be affected by dust and noise pollution (as well as air pollution), whether or not they use the specific routes impacted by construction or operation. We also recognise that dust, road run-off and other pollutants could result in contamination of water courses much further afield than those adjacent to the red line boundary itself.

We disagree with the assertion (8.86) that the scheme “meets the requirements set out in Policy JPA30 and JP-P1 of the PfE Plan, and Policy L7.3 of the Core Strategy”. Given the lack of consideration of all traffic flows that will use the road, all effects must be reviewed.

We are also concerned that Operational Vibration was scoped out of the assessment given that the eastern part of the road will be adjacent to future housing development and that it is next to the mitigation areas. Residents near to the Isherwood Road junction are already reporting vibration issues and the presence of potholes is a huge issue in Trafford. Whilst this will be a new road, the likelihood of flooding and other disturbances to its surfaces will result in the potential for irregularities to appear.

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ES Chapter 14 Socio Economic and Human Health (document 1538080) highlights the mental and physical health impacts of noise pollution (paragraph 14.8.94). It should be noted that there will be a very significant and disproportionately negative effect of noise pollution for those with special educational needs, many of whom will be acutely sensitive to sensory impacts, which can trigger behavioural changes.

ES Chapter 14 Socio Economic and Human Health (document 1538080) highlights the mental and physical health impacts of increased flood risk (paragraph 14.8.86). The document does not mention the risks to financial health, which are exacerbated for vulnerable residents, who may not have insurance and will be challenged to be able to afford to repair or replace damaged property.

NPPF paragraph 198c requires development to “*limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation*”. The effects of light pollution from this scheme on the current dark skies of the landscape will be very significant, particularly for wildlife and bird species but also for human receptors adjacent to the road.

The night-time effects for the eastern part of the road should be considered in the context of the existing flat open landscape. As set out in the ES Non-Technical Summary (document 1538053, paragraph 4.5.4), these issues will be exacerbated by the removal of vegetation and the presence of construction plant. The documentation incorrectly suggests these effects would be temporary and localised. There will be a huge and ongoing adverse impact on nocturnal wildlife.

We disagree with the assertion in the Planning Statement (document 1535827) that the impact on ecology has been carefully considered (8.52), the alternative solution should have been proposed to ensure harm is avoided (the existing public rights of way could be upgraded with low level lighting that will not result in the huge impact of light sources on habitats and species, for example). We, therefore, disagree that (8.54) the lighting strategy “*protects existing habitats where possible in line with PfE Plan Policy JP-G8*”.

ES Chapter 14 Socio Economic and Human Health (document 1538080) appears to suggest that the quality of the built environment of a road could be perceived as beneficial to health (14.8.114) when compared to the current well-used green spaces, woodland and active travel routes and that (14.8.116) the road could improve confidence in the area. This is a ridiculous and rather biased contention, especially given the feedback from the consultation, mentioned above, which confirms that 77% of respondents are not in favour of the road!

The proposed eastern part of the route will not be perceived as beneficial by local residents or users of the existing routes. We also disagree that the lighting provided by the new road will make the new active travel routes safer than the existing byways across Carrington Moss, for which there are no recorded serious accidents or injuries.

Furthermore, the suggestion (14.8.200) that the road will “*divert through traffic and heavy good vehicles away from residential areas, which will improve road safety in these areas*” is false. Whilst there could possibly be a reduction in vehicles through Carrington Village, this is not guaranteed and will certainly not be the case for other parts of Carrington or for other communities surrounding the scheme. The volume of through traffic will have a huge impact on the east and west-bound A6144 (as highlighted in figures 6.1 and 6.2 of the Transport Assessment).

As mentioned above, the road will not improve safety. HGVs will be travelling at speed across a wildlife corridor, and some will be carrying hazardous materials. Accidents and incidents are likely to increase, especially if there is an increase in extreme weather conditions. There is also a deliberate gap in fencing that could result in wildlife or horses escaping onto the road.



Landscape and Visual

There will be huge, negative and permanent landscape and visual effects as a consequence of the eastern part of the scheme. Whilst this is acknowledged in the documentation, it does not highlight the impact on Sale West residents, including the cumulative landscape and visual impact effects of all development in the area.

We do not understand how the context of the site, its localised setting and these mitigation measures (which cannot be described as robust) will “*balance*” the adverse effects (Planning Statement, document 1535827, paragraph 8.75).

The harms will be created immediately, yet the proposed mitigation is not expected address the adverse effects, even at year 15 of operation (ES Non-Technical Summary, document 1538053, paragraph 4.5.6), and will not replicate, compensate for, or strengthen the landscape features (Planning Statement, document 1535827, paragraph 8.74).

Biodiversity Net Gain

Unlike the alternative options available to Trafford, this scheme does **not** minimise impacts on biodiversity and the eastern part of the road explicitly destroys the habitats of threatened species, leading to a further sizeable depletion of their populations. This is contrary to the mitigation hierarchy, as required by NPPF paragraph 193.

The Biodiversity Net Gain Appraisal Final (document 1538256) sets out (paragraph 2.3) the approach to avoidance but fails to mention that the alternative (previous known as Option A) would have achieved total avoidance of harm on the eastern part of the route.

The Planning Statement (document 1535827) suggests (paragraph 8.47) that the “*proposed Landscaping Masterplan is expected to deliver an 77.04% increase in area habitat units, 614.15% increase in hedgerow habitat units, and 29.39% increase in watercourse habitat units. This follows a net change in biodiversity units of 101.79 for area based habitats, 60.89 for hedgerows, and 0.70 for watercourses*”.

These Biodiversity Net Gain (BNG) benefits are significantly exaggerated, with the value of existing land in the eastern part of the scheme being understated (the assessment of wetland as cropland, for example, significantly undervalues some of the land in the area). Whilst there will undoubtedly be an opportunity to provide huge biodiversity improvements to the industrial western part of the scheme, there will be significant destruction to the ecological and environmental assets in the eastern part of the road.

The Biodiversity Gain Plan (document 1538250) incorrectly states that there “*are no irreplaceable or very high distinctiveness habitats located within the proposed development RLSB. There will be no loss of high distinctiveness habitats within the RLSB*”.

It is known peat is present within the Red Line Boundary and Natural England has determined that the peat moss at Carrington is both restorable and irreplaceable habitat. Government guidance⁴⁶ has not been followed and the detailed peat survey has not been provided with the planning application data.

Furthermore, the BNG benefits could be provided (and there is a higher likelihood of successful implementation) with the alternative option, as the Planning Statement (document 1535827) confirms (paragraph 8.48) that the majority of the biodiversity lift is concentrated on the eastern side of the site boundary.

⁴⁶ <https://www.gov.uk/guidance/irreplaceable-habitats>



Cumulative Effects

There is little reference within the documentation to the cumulative effects of all the proposed development in this area. The ES Non-Technical Summary (document 1538053) highlights that (paragraph 4.15.5) the cumulative projects were agreed with Trafford during the Scoping Stage and suggests (paragraph 4.15.6) that the majority of effects are not considered significant.

Given the size and scale of the proposed developments in the area, it is astounding that the huge and adverse effects on local communities have been dismissed in this way. The document appears to play down the cumulative impact and does not mention, for example, the potential additional development caused by the road turning the existing Green Belt land into Grey Belt, which will add to the cumulative adverse impacts of the scheme.

It is also likely that this will not be the only construction being delivered during the construction period. This will increase HGV traffic and the consequential impacts, including air, noise, light, vibration, dust and water pollution (and carbon emissions).

The outcome will be further loss of agricultural land and important soils, including peat. The Landscape and Visual effects will increase because of the scale of the built environment, including warehouses that are proposed to be 22m high. Pollutants will rise considerably due to increased traffic and congestion in the area.

The ES Non-Technical Summary (document 1538053) highlights that (paragraph 4.15.9) a number of so-called beneficial cumulative effects. We disagree. The Planning Statement (document 1535827), for example, states (paragraph 7.128) that the New Carrington site accounts for approximately 30% of Trafford's new homes but it does not account for 30% of the current housing waiting list (in fact, the allocation area only needs to deliver a maximum of 15% affordable homes and the vast majority of those will not be genuinely affordable). Given the deprivation in surrounding communities, affordable housing to buy will not be affordable for those families, so this is not a benefit (cumulative or otherwise).

The proposed employment area is limited to the provision of warehousing (much of which has been automated) or Battery Energy Storage Systems (BESS). Almost no retail, innovation, technology, or green jobs. The 3 BESS approved in the area provide no local jobs at all. This means the available roles will also be limited, again providing few benefits to local communities.

Temporary construction roles are just that – temporary. There are no guarantees that any temporary (or permanent) roles will be offered to local candidates. This will bring very few socio-economic benefits to local communities.

The scheme and the cumulative developments will not bring any health benefits to local communities. Quite the opposite. Financial, mental and physical health will be impacted by huge increases in pollutants, traffic accidents and the increased risk of flooding. It is disingenuous to suggest otherwise.

The ES Non-Technical Summary (document 1538053) suggests (paragraph 4.15.10) that no additional mitigation or monitoring measures are required, except potentially for noise. It should be noted that the huge increases in traffic, congestion, pollution and accidents **will** affect all surrounding communities and local conservation sites, not just a few individual receptors. We are astounded by the minimisation of the significant effects on both human and wildlife species. The majority of cumulative effects **will** be significant, even following the implementation of mitigation measures.

The Summary of Significant Effects (Table 4.1) in the ES Non-Technical Summary (document 1538053) demonstrates the requirement for predetermined outcomes with the document suggesting that there are no significant effects for any of the following (despite the recognition that, for example, traffic will be 'drawn' from the motorways to use this route and that there will be significant new development approved as a consequence of this scheme):

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- Air Quality (both during construction and operation) – this is an impossible outcome – air, noise, light, vibration, dust and water pollution, including from road run-off, will all significantly increase due to this scheme and the residual effects will be enormous
- Landscape and Visual Impact (from year 15) - no significant effects on landscape – again an impossible outcome for the eastern part of the route
- Noise and Vibration (no impact during construction) – again an impossible outcome. There will be a huge impact on local communities and users of the eastern part of the route, including those with special educational needs
- Noise and Vibration (only 34 receptors mentioned, with mitigation, indoor noise levels will be ‘acceptable’) – again an impossible outcome. There will be an enormous direct impact on communities in both Carrington and Sale West which are closest to the road. There will also be an indirect impact on Partington, Warburton, Sale West and Ashton on Mersey communities, because of the huge increases in through traffic.
- Agricultural Land Holding (no significant effects during construction) – this is incorrect
- Human Health (no significant effects during construction) - this is incorrect
- Road Drainage and Water (both during construction and operation) – this is incorrect
- Climate (both during construction and operation) – this is incorrect.

The impacts of these effects are significantly underestimated, and this is very concerning.

Missing Documentation

The planning application cannot be appropriately assessed by the public due to the number of missing documents on the planning portal. These include:

- a Travel Plan which has been explicitly excluded on the erroneous determination that the road will not ‘generate’ additional traffic, this documentation should explicitly show **all** the anticipated traffic volumes, including those for HGVs
- a detailed peat assessment for the scheme
- a compensation strategy to address the loss or deterioration of the irreplaceable habitat, as required by NPPF para 193c
- a Full Business Case, which is essential to determine whether the proposal offers a cost effective, sustainable solution, with specific critical success factors (such as, for example, delivering a radical reduction in carbon emissions, supporting the delivery of Greater Manchester’s Transport Strategy aims, and genuinely addressing the transport challenges of local communities, whilst minimising environmental and ecological harms). The lack of transparency, preventing the public from reviewing the benefit-cost ratio, reduces the credibility of the scheme and increases the risks related to fiscal responsibility and environmental integrity
- a detailed Natural Capital⁴⁷ assessment which, as recommended in the Treasury Green Book⁴⁸, should form part of the business case and appraisal of the project. An assessment of the value of local natural capital assets and ecosystem services, accounting for their contribution to the economy, and the range of social and economic benefits and opportunities that come from investment in those assets should have been included in the assessment of the benefits of the scheme and in any updated business case that has been developed.

⁴⁷ https://assets.publishing.service.gov.uk/media/67a2284508d82b458c553c13/ENCA_guidance.pdf

⁴⁸ https://assets.publishing.service.gov.uk/media/6645c709bd01f5ed32793cbc/Green_Book_2022_updated_links_.pdf



The omission of this assessment suggests best public value has not been achieved and that there is a huge risk that the value of the natural environment has been ignored in decision making to date

- the Green Book also refers to the legally binding targets set out in the Environment Act 2021 and suggests these should be taken into account when proposals are being developed. There is no evidence that achieving these targets has been considered when assessing the benefits of this scheme.
- the Green Book also includes supplementary guidance⁴⁹ to ensure that “*policies, programmes and projects are resilient to the effects of climate change, and that such effects are being taken into account when appraising options*”, evidence that this guidance has been followed is not included in the documentation despite the proposed land use change
- a comprehensive risk assessment, which should include all risks and issues that will affect the financial, physical and mental health of local communities, showing explicitly how such harms will be mitigated is also omitted from the documentation.

Full Business Case

The document confirms (paragraph 7.74) that by 2045, ie within 15 years, junctions 6 and 7 will “*approach or exceed their operational limits*”. At over £132m, with a significant proportion of the costs coming from the public purse, a robust and detailed Full Business Case should have been included within the planning application documents, for review by communities, to confirm that the scheme will achieve good value for public money.

Whilst the documentation within the planning application repeatedly highlights the contribution the scheme will make to short term GVA creation (ES Chapter 14 Socio Economic and Human Health, document 1538080, paragraph 14.8.16, for example), suggesting this is “*significant in EIA terms*”, there is no calculation setting out the value of the loss of natural capital and ecosystem services, nor the losses to be felt in the rural economy and its supply chains.

The importance of local natural capital is highlighted in ES Chapter 14 Socio Economic and Human Health (document 1538080) which asserts that (paragraph 14.7.70) the green and blue spaces in the study area are “*predominantly within the best to second best deciles nationally. In addition to this, the Office for National Statistics Health Index Score for the domain of access to green space exceeds that of the national average*”. This should have prompted the detailed calculation of natural capital and ecosystem services value and the implications of the proposed harms.

In addition, losses of natural capital and ecosystem services will commence as soon as the planning application is approved (given the lack of avoidance of harm by this scheme) but mitigation will not be delivered or mature for many years, meaning that some habitats and species may never recover and the losses will become permanent.

We believe the community promoted alternative scheme can deliver the benefits set out in this planning application, without the harms to be caused to natural capital and ecosystem services. Together with reduced costs of construction, this would result in a much improved business case.

⁴⁹

https://assets.publishing.service.gov.uk/media/6830434ce9440506ee953a33/Accounting_for_the_effects_of_climate_change_Green_Book_supplementary_guidance.pdf

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The alternative option is also likely to result in, for example, improved uptake of active travel, due to the upgrading of the existing pleasant, safe and healthy routes across Carrington Moss. This, along with enhancements to ecology and biodiversity, would increase the value of natural capital and ecosystem services, again improving the business case.

In relation to the Full Business Case, we would like to understand, for example:

- Whether alternative options have been included
 - ES Chapter 14 Socio Economic and Human Health (document 1538080) incorrectly asserts (paragraph 14.7.88) that there are “*no alternative proposals to the delivery of the Proposed Development*”. We have discussed various alternatives above and there should be comparable information in the business case to determine the most appropriate solution, bearing in mind that the Preferred Option Report revealed that the costs for Option A (the alternative route) were more favourable than those for Option F (the route of the scheme), and many of the costs for Option F were excluded from the comparison.
- Has the Full Business Case followed Treasury Green Book guidance, and does it include a detailed assessment of the loss of natural capital and ecosystem services?
- What sensitivity analyses have been undertaken in the business case to test how variations in environmental factors might impact financial returns
- What is the benefit-cost ratio (ie will the scheme deliver good value for public money)
- How the other transport interventions mentioned at Appendix D in PfE have been considered
 - PfE evidence documents did not set out the anticipated costs for the full list of transport interventions for the New Carrington allocation (PfE, Appendix D) and that information was **not** made available in response to Freedom of Information Act requests. Without access to such data, it cannot be determined that the allocation is viable and that the business case for the road is sound.
- What the distribution of funding is expected to be
 - How much of the anticipated costs will be funded by the public purse?
 - Trafford’s Accounts and Audit Committee, 21st November 2024, highlighted (1:29:50⁵⁰) that this “massive” scheme is a risk because it is not in the budget. Whilst we understand there is a small amount now included in the Capital Budget (£16m), what will be the source of the remainder of the required funds?
- How much contingency has been proposed?
 - How has inflation been considered? This article⁵¹ highlights that previous projects were either frozen or that Councils were forced to find millions from their own budgets to complete works “*because of soaring costs which have exceeded government grants*” and this article⁵² highlights that a Council was required to increase their contributions from £14m to £51m due to the increased costs of a road scheme.
 - How will any overspend be funded?
 - How have the risks been considered within the contingency budget?
- How have the supposed benefits been considered?

⁵⁰ <https://www.youtube.com/watch?v=38pwkMaPHXo>

⁵¹ <https://www.theguardian.com/politics/2023/jan/24/councils-freeze-levelling-up-projects-as-soaring-costs-exceed-grants>

⁵² <https://www.bbc.co.uk/news/uk-england-leicestershire-64058658>

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- How has the potential for temporary job creation been taken into consideration (if at all)?
- How has the traffic induced from the motorways (and the associated congestion this induced traffic will cause) been taken into account?
- What assumptions have been made in relation to the benefits of the scheme?
- How has the impact on the rural economy been considered?
 - ES Chapter 14 Socio Economic and Human Health (document 1538080) highlights (paragraphs 14.8.13 and 14.8.34) that the Agricultural Land Assessment considers the potential employment impacts for farm workers and contractors, that the permanent loss of agricultural land could potentially lead to a decrease in seasonal and contract labour demand and that the livery business may experience a decline in numbers which could affect employment but states that these employment effects are not quantified as they are expected to be less than negligible – this does not take into account the cumulative impacts of development in the area on the rural economy
- Has compensation for the significant effects been included?
 - The ES Non-Technical Summary (document 1538053) confirms (paragraph 4.12.19) that there will be significant adverse effects from noise pollution post mitigation, which could require additional mitigation
- How has the impact on the public purse been considered
 - The ES Non-Technical Summary (document 1538053) confirms that there will be adverse effects to human health (paragraph 14.12.13, 14.12.17) but this does not appear to translate into a cost to the public purse as a consequence of this road. The Full Business Case should, therefore, include the costs associated with the additional health services requirements associated with the road, including in relation to the huge increase in pollutants. This will lead to more GP and hospital appointments due to, for example, more residents seeking support for respiratory and cardiovascular conditions.

The absence of a Full Business Case (which should be available to communities for review and comment) means that the decision-maker is unable to determine whether the scheme offers value for money, and whether the application demonstrably complies with policy.