

Response to the GM Transport Strategy 2050



A sustainable Transport Plan for Greater Manchester?

Introduction

We are responding to the shorter version of the consultation because we believe the documentation needs to be checked for errors and reissued for further consideration by the public. As an example, the strategy document¹ (paragraph 4.25) appears to suggest that there is “*unrivalled port connectivity at New Carrington*”. We wish this were true. In fact, we campaigned for port connectivity to alleviate the impact of the huge number of HGVs (and the associated air, noise, light, vibration, dust and water pollution, to say nothing of carbon emissions) on local roads.

The ‘quantifiable carbon’ assessment mentioned in our response to question 1 should also be completed prior to a further consultation.

Furthermore, all requests from communities for sustainable passenger and freight transport options at New Carrington have been ignored, as set out below. The only commitment, which is supported in this strategy, is for an unsustainable road scheme that does not support the aims of the strategy. Why isn’t the strategy focused on meeting its own objectives?

Question 1: What are your thoughts on our transport target? To improve our transport system so that, by 2040, 50% of all journeys in GM will be made by sustainable travel (public transport, walking, wheeling, or cycling). This would be a change from 40% sustainable travel at present.

FOCM Response: Too low

Please explain your answer

The Vision includes fine words about making Greater Manchester’s transport system inclusive and affordable, environmentally responsible, safe and secure, healthy and well-maintained. Yet the proposed targets and delivery plan fall well short of this Vision.

This unambitious increase in the transport target will not drive achievement of air quality standards or the Combined Authority’s aim of becoming carbon neutral by 2038. TfGM should immediately carry out a ‘quantifiable carbon’ assessment, in accordance with government guidance, to show whether or not the draft Plan is sufficient. If not, it should strengthen this target and the policies to deliver it.

A higher target is needed to free up sufficient space to enable buses and trams to run more frequently, more reliably and more efficiently. Achievement of a higher target would also make walking, wheeling and cycling safer and more attractive, increasing the proportion of trips that people make using clean and healthy transport and supporting the modal shift that is proving such a challenge. These travel options need to be safe, convenient, affordable and accessible to all, so that fewer people feel their only option is to drive.

That said, when the largest allocations in the region are not complying with the 2040 target, any increase without radical action will be meaningless.

Whilst we recognise the need to be practical, it is clear that GM will not meet the existing aspirations. This is facilitated by TfGM’s continued acceptance of the prioritisation of road schemes, supporting proposals in the Green Belt and elsewhere.

¹ https://www.gmconsult.org/transport/transport2050/user_uploads/draft-gm-transport-strategy-2050-4.pdf

Response to the GM Transport Strategy 2050



To drive achievement of the aspirations purported to be held by TfGM, all such road schemes should be replaced with sustainable alternatives, including rail and water-based transport.

Furthermore, given the climate and biodiversity emergencies, we are not clear how this uninspiring increase will support the GM 5 Year Environment Plan², which sets out (page 12) the importance of adopting a sustainable transport system and the need for “*a fundamental shift in attitudes towards car journeys, alongside a major shift to sustainable transport modes*”. The document goes on to contend that “*We need to plan for growth in a way that minimises reliance on the car*”. It also highlights that “*more challenging reductions in car travel are likely to be necessary*” to achieve the ‘Right Mix’.

If the largest developments in GM continue to be car/HGV dependent and dominated allocations, the concerns raised in the Environment Plan, such as increasing vehicle mileage, increased market share of larger heavier vehicles and only marginal shifts to low emission modes, along with continued challenges to decrease transport related air pollution, will be entrenched for the foreseeable future.

Question 2: Which of our network ambitions are most important to you?

FOCM Response:

1. Environmentally responsible - Reducing environmental impacts from transport such as air, water and noise pollution, and carbon emissions
2. Safe and secure - A transport network that is safe to use (e.g. through improving road safety, having well-lit and monitored public spaces, and tackling antisocial behaviour)
3. Inclusive and affordable - A transport network that can be easily used by everyone and has fair and reasonable pricing
4. Healthy - Helping people lead active and healthy lives (e.g. enabling walking, wheeling, cycling and easy access to healthcare)
5. Well-maintained and resilient - A well-maintained transport network, able to cope with challenges like extreme weather or increased demand
6. Reliable - Reliable journey times and transport services that always turn up and are on time
7. Integrated - Different types of transport that connect seamlessly and journeys are easy to plan

Please explain your answer

Whilst we strongly support all 7 of these network outcomes and are reluctant to prioritise them, we have ranked the top 4 as essential outcomes for making Greater Manchester a truly transit-oriented city region, while recognising that the remaining 3 are crucial for the top 4 to be achieved.

Question 3: Overall, how far do you agree or disagree that our transport policies will help to achieve Greater Manchester's transport system for the future?

FOCM Response: Disagree

² https://www.greatermanchester-ca.gov.uk/media/aln10fsy/gmca_5-year-plan_final_digital_v3-ua.pdf

Response to the GM Transport Strategy 2050



Please explain your answer

The stated aims of the Local Transport Plan (LTP), as outlined in the 7 'network ambitions', are admirable. There is, however, insufficient commitment to significantly reduce motor vehicle traffic. This is needed to enable walking, wheeling, cycling and on-street public transport to function effectively, so that Greater Manchester's transport system can fulfil these ambitions.

We are also concerned about the number of road schemes proposed in the LTP – such as the Carrington Relief Road. These would increase motor traffic levels, undermine the viability of public transport networks, damage the local environment, worsen air quality and frustrate Greater Manchester's aim to be carbon neutral by 2038. They would also take funding from solutions that would better support the LTP's ambitions.

Question 4: Do you have any comments on the proposals in Map 1 - Deliver?

FOCM Response:

We strongly support the proposed rail and metro improvements, and those street improvements which prioritise improved conditions for walking, wheeling, cycling, buses and trams and the quality of the built environment, and/or reducing the dominance of motor traffic.

We strongly oppose the plans for the Carrington Relief Road. This scheme and the other road schemes shown on this map - i.e. the Mottram Bypass A57 Link Road (now under construction) and the National Highways M60/M62/M66 Simister Island scheme (about to start construction) - are all contrary to the stated aims of the LTP, particularly the aim to make Greater Manchester carbon neutral by 2038. They will also result in huge increases to air, noise, light, vibration, dust and water pollution.

These roads would not be needed if the GMCA, the districts, and TfGM implemented existing transport policies and introduced more ambitious policies to reduce motor vehicle traffic and focused all public sector investment on sustainable passenger and freight transport.

We understand that the proposals in Map 1 are committed. This means that the **only** commitment for the largest development in the Places for Everyone Plan (New Carrington) is an unsustainable road scheme, despite the former railway line running through the site and the proximity of the Manchester Ship Canal.

The Outline Transport Strategy for New Carrington³ concludes that 'Scenario 2' is realistic and achievable. This results in travel mode shares of 74% car, 26% non-car, including 8% PT, and 18% active travel. This scenario does not achieve the key aims of the current or future GM Transport Strategies (GMTS).

That the largest allocation within PfE will not achieve the ambitions of the GMTS 2040 is astounding and, along with other schemes focused on road-based transport, will have a material impact on the goals of the strategy being attained. The goals are, therefore, not credible given the continued promotion of car/HGV dependent and dominated new development.

For New Carrington, for example, there are no bus service improvements considered in this phase of the delivery plan (despite Trafford's acknowledgement that bus services are very poor in this area).

3

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

Response to the GM Transport Strategy 2050



It should be noted that ONS data shows⁴ that around 40% of households in Partington and Sale West do not have access to a car so a new road scheme will provide no benefits to residents in these deprived communities.

Whilst the Carrington Relief Road scheme includes active travel, walking, cycling or horse riding next to huge volumes of traffic will be **unhealthy** (huge levels of PM_{2.5}), **unsafe** (gaps in fencing to create unmanaged crossing points, the current wildlife corridor supporting nocturnal mammals, deer, foxes, horses and dogs and the number of HGVs, many carrying hazardous materials), and **unpleasant** (walking, cycling and horse riding adjacent to over 30,000 vehicles a day does not compare with active travel through the countryside, as on the existing recorded and unrecorded public rights of way across Carrington Moss).

Question 5: Do you have any comments on the proposals in Map 2 - Develop and Deliver?

FOCM Response:

We strongly support the proposed rail and metro improvements, and those street improvements which prioritise improved conditions for walking, wheeling, cycling, on-street public transport and the quality of the built environment, and/or reducing the dominance of motor traffic. The more of these that can be delivered by 2037, the better.

We strongly oppose the road and motorway schemes shown on this map. These schemes are contrary to the stated aims of the LTP, particularly the aim to make Greater Manchester carbon neutral by 2038. They would not be needed if the GMCA, the districts, and TfGM implemented existing transport policies and introduced more ambitious policies to reduce motor vehicle traffic and focused all public sector investment on sustainable passenger and freight transport.

We welcome the New Carrington bus service improvements included in this phase of the strategy (enhancements to the local bus network, improving public transport accessibility, reliability, and coverage across the area) but these should be a commitment and should be implemented much earlier (and in advance of any new road capacity).

Whilst we do not object to the Trafford Greenway scheme (which provides a walking and cycling corridor linking New Carrington/Partington with Altrincham, and ultimately across the ship canal towards Cadishead/Irlam), this is a wasted opportunity. This former railway line is considered to be 'live' by Network Rail and communities have been campaigning for almost 10 years to have this reopened to provide tram or train links between Partington and Timperley initially, followed by a further phase to link Partington to Irlam. This would genuinely provide the connectivity for Partington that will not be delivered by a new road scheme.

This sustainable passenger transport option would also provide the futureproofing needed given the level of development proposed for the area, but it is not included in the GMTS nor in Trafford's Local Plan. We are astounded that there are no plans to progress this for the foreseeable future!

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!

⁴ <https://www.ons.gov.uk/census/maps/choropleth/housing/number-of-cars-or-vans/number-of-cars-5a/no-cars-or-vans-in-household?msoa=E02001275>

Response to the GM Transport Strategy 2050



We note that other areas appear to be more generously supported in the delivery plan. A new railway station is proposed at Old Trafford (Map 4), for example, Timperley Wedge will have a tram stop (to support sustainable growth), the tram will be extended towards Trafford Waters, Salford Stadium and Port Salford (also in the Western Gateway). Outside of Trafford, the delivery plan shows, for example, tram links to Hazel Grove, to Wigan, to Bolton and to Leigh. The strategy is even facilitating links to Mid Cheshire, but the largest allocation in PfE has no proposed rail or tram improvements!

Given the size and scale of the proposed developments at New Carrington, it is unacceptable for TfGM to support only a developer-led unsustainable road scheme, rather than the sustainable passenger and freight transport options repeatedly requested by local communities.

Port Salford, for example, will be provided with a rail link and freight terminal, yet there is not even a proposed link from New Carrington to Port Salford, never mind a port, a rail link and/or a freight terminal in this area, which means huge numbers of HGVs, some carrying hazardous materials, will be travelling on local roads, increasing carbon emissions and pollutions. One scheme alone (Trafford Green Hydrogen) will add over 700 HGVs a day to the road network.

We also note that the commentary around the M62-M60 Link has changed from the previous version (M62 – Carrington – M60 link). Please confirm what has changed with this proposal. We do not want to be excluded from the planning and then find that this link will still come through this area.

Question 6: Do you have any comments on the proposals in Map 3 - Explore and Develop?

FOCM Response:

We strongly support the proposed rail and metro improvements, and those street improvements which prioritise improved conditions for walking, wheeling, cycling, on-street public transport and the quality of the built environment, and/or reducing the dominance of motor traffic. The more of these that can be delivered by 2037, the better.

We strongly oppose the road and motorway schemes shown on this map. These schemes are contrary to the stated aims of the LTP, particularly the aim to make Greater Manchester carbon neutral by 2038. They would not be needed if the GMCA, the districts, and TfGM implemented existing transport policies and introduced more ambitious policies to reduce motor vehicle traffic and focused all public sector investment on sustainable passenger and freight transport.

For New Carrington this phase will provide access improvements. We would like to understand exactly what these are and where they are and whether they will genuinely be sustainable transport or active travel options. We would also like to understand why they are not coming forward earlier in the delivery plan.

This phase also mentions Carrington Spur Upgrade Improvements. Why is it anticipated that this will be needed? The focus should be on reducing car and HGV reliance not on constructing ever more capacity to support road-based journeys.

This phase also mentions a West Trafford Bus Connectivity Study. Please provide more information about this initiative and the communities it will support.

Question 7: Do you have any comments on the proposals in Map 4: Regional Centre?

FOCM Response:

Response to the GM Transport Strategy 2050



We strongly support the proposed rail and metro improvements, and those street improvements which prioritise improved conditions for walking, wheeling, cycling, on-street public transport and the quality of the built environment, and/or reducing the dominance of motor traffic. The more of these that can be delivered by 2037, the better.

Question 8: Do you have any comments on the proposals in Map 5: Bee Network Rail?

FOCM Response:

We support the plans for the phased integration of Greater Manchester's rail network into the Bee Network Rail.

Question 9: Do you think anything important is missing?

Yes

FOCM Response:

There are currently very limited and very late sustainable passenger proposals (bus services only and not in the committed phase of delivery) and no sustainable freight transport proposals for New Carrington, despite the former railway line and the proximity to the Manchester Ship Canal.

Given the size and scale of the proposed developments in this allocation, reviewing this gap should be a priority, especially as communities have repeatedly requested the reopening of the former railway line over the past 10 years.

Question 10: Do you have any general comments or suggestions, that haven't already been covered in your previous responses, about Greater Manchester's Transport Strategy 2050 and Delivery Plan?

FOCM Response:

All proposals supported by TfGM should be derived from a transparent and policy-led appraisal, aligned with national, regional and local objectives and policies. The strategy should, more sustainably, address congestion, improve road safety and facilitate new development in a way that prioritises sustainable passenger and freight transport options.

With the above in mind, we note, for example, that the GMTS Delivery Policy 10 does not commence from the perspective of not unnecessarily increasing road capacity. New Carrington does not comply with Policy GP1, which prioritises sustainable travel and considers road capacity should be based on the traffic that remains after investment in sustainable modes has been taken into account. Given the road will come forward first, this policy requirement cannot be observed.

New Carrington also does not comply with Network Policy 5, which aims to encourage new development and land use patterns that reduce the need to travel by car, ensure a vision led approach to deliver well-designed, sustainable places that prioritise travel by sustainable modes. The planning application confirms (document 1535827, paragraph 10.3) that the Carrington Relief 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. A series of disconnected, collection of housing and warehousing parcels that are only accessible by road, rather than a coherent, sustainable location.

Response to the GM Transport Strategy 2050



It seems GM does not agree with the concept of Transit Oriented Development. This is clear from the plans for New Carrington, which has low density housing oriented around a series of new spine roads, rather than around public transport hubs. This approach will not reduce car dependency, increase public transport use or encourage active travel (due to the high levels of pollution on the proposed walking, cycling and horse riding routes).

And how have community views been taken into consideration in the transport vision for New Carrington – not at all! All resident feedback has been ignored.

The GMTS should ensure there is significant scrutiny of any decision to discount more sustainable transport options in favour of unsustainable road solutions. If road schemes are being advanced as the most appropriate outcome, it is incumbent on the district to demonstrate why alternative, more sustainable options have been dismissed.

We also need a fairer transport system. As we mention above, ONS data demonstrates that around 40% of households in vulnerable communities in New Carrington do not have access to a car. Yet the **only** committed development for the area is a new road!

In addition, the government's Public Health briefing (May 2016⁵) 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"*.

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 new roads 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 also other mental and physical health conditions, along with the health, fire and police services costs of dealing with increased road accidents.

It is recognised that transferring trips to more sustainable transport options (and not increasing road capacity for motor vehicles) would reduce carbon emissions, air, noise, light, vibration, dust and water pollution and would reduce casualties (and, therefore, costs to the public purse).

Public funding and TfGM support should, therefore, be focused on sustainable passenger and freight transport options. In choosing Scenario 2, the New Carrington Outline Transport Strategy, for example, does not support the aims and ambitions of the GMTS. This should not be acceptable, particularly when significant levels of public funding will be needed to deliver the road scheme and the evidence (including in the GMTS delivery plan) shows that there is no longevity of capacity in the proposal.

Policy Compliance

The priority for this strategy should be to demonstrably secure outcomes that meet national, regional and local policies.

The GMTS should require any initiative that is to be supported by TfGM to fully comply with those policies. If there are to be genuine efforts to create sustainable communities across Greater Manchester, more emphasis must be given to policy compliance.

5

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

Response to the GM Transport Strategy 2050



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. The current continued preference to increase road capacity dilutes and displaces public transport options in favour of retaining car/HGV dependence and dominance.

The Carrington Relief Road initiative, for example, does not comply with many NPPF, PfE or Local Plan policies. In relation to the PfE JP-C8 policy requirements, for example, 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
- reduce traffic congestion or the number of vehicle movements
- appropriately consider the air quality impacts on Holcroft Moss.

Given the lack of policy compliance, this initiative should be removed from the GMTS.

Evidence to support Delivery Proposals

The GMTS should require any initiative that is to be supported by TfGM to provide accurate, up to date, comprehensive information, including in Environmental Statements that support development plans or planning applications. Consideration of, for example, air quality in Environmental Statements should be based on reliable, complete data about traffic numbers.

The Carrington Relief Road planning application, for example, does not acknowledge that the road 'generates' additional traffic, despite decades of noteworthy research⁶ confirming that new road capacity **does** generate additional journeys. In the SACTRA (1994)⁷ 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*".

WSP's (2018) Evidence Review for the Department of Transport⁸, for example, highlights that "*In cases where network improvements stimulates additional traffic and this additional traffic affects travel conditions, partially recongesting 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*". Lack of consideration of induced and 'generated' traffic leads to incomplete or inaccurate assessments of the environmental impacts of any scheme.

TfGM should also require evidence that there is community support for the schemes being proposed. For New Carrington, for example, there is consistent evidence over many years that the Carrington Relief Road is not supported by communities, with the latest consultation (2025) confirming that 77% of respondents are not in favour of the road.

⁶ <https://tapas.network/35/hopkinsongoodwin.php>

⁷ 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](#)

⁸ <https://assets.publishing.service.gov.uk/media/5c0e5848e5274a0bf3cbe124/latest-evidence-on-induced-travel-demand-an-evidence-review.pdf>

Response to the GM Transport Strategy 2050



Evidence should also include, as a minimum, (i) a Full Business Case, which should follow Treasury Green Book⁹ guidance and include a Natural Capital assessment (as set out in the government's Enabling a Natural Capital Approach (ENCA)¹⁰), (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, (iv) a Travel Plan, which should explicitly show the anticipated traffic volumes, including those for HGVs, where appropriate (v) a comprehensive assessment of policy compliance.

Inappropriate Comparisons

The GMTS should require any initiative that is to be supported by TfGM to provide fair and meaningful comparisons.

The New Carrington Outline Transport Strategy¹¹, for example, highlighted that the proportion of internal journeys, remaining wholly within New Carrington will be 17%. This is highly unlikely given the lack of amenities in the area (retail, schools, doctors surgeries, dentists, a range of employment opportunities). The New Carrington area provides warehousing (much of which has now been automated) and Battery Energy Storage Systems (which do not provide any local jobs), so many residents will have to travel to access employment.

The strategy confirms that this figure for internal journeys has been derived from what is described 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 GMTS should require meaningful comparisons to be made.

Horse Riding Needs

It is recognised that active travel includes horse riding.

There are over 1,000 horses stabled on and around Carrington Moss. The GMTS should consider the needs of horse riders, including ensuring active travel routes use surfaces suitable for horse riders, consider the safety requirements (noise can be a big problem) and that junctions/crossings provide appropriate facilities and time to meet the needs of horse riders.

9

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

¹⁰ <https://www.gov.uk/guidance/enabling-a-natural-capital-approach-enca>

¹¹

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