



Introduction

This second FOCM representation relating to the Carrington Relief Road planning application, should be read alongside our initial response (dated 2nd March 2026) and the report produced by the independent traffic consultant (dated 2nd September 2026).

The points raised in our initial response are still valid and, as we highlight below, the comments received from the project team do not address the concerns we have raised, nor change the weight we would afford to the various aspects of the scheme.

Since that original submission, we:

- have, on behalf of local communities, submitted a formal request that our alternative option be fully considered given the harm to be caused by Trafford's proposed solution
- await responses to questions raised at the traffic numbers meeting (20th July 2026) with the project team and a number of FOI requests (as set out below)
- have made a formal request for the comprehensive and transparent publication of the full business case for the road in advance of the decision to determine the planning application.

It is important that the outstanding information is provided to enable a full and detailed assessment of the planning application to be carried out.

We set out below some additional information to be considered in relation to the determination of the planning application, including:

- compliance with national policy
- concerns about the lack of a business case
- local considerations
- feedback on the project team response to our original representation
- details of our outstanding information requests.

As mentioned above, the additional information provided by the applicant does not change the weight we would afford to the various issues in the planning balance. As an example, whilst we agree with the Updated Planning Statement's assessment (paragraph 9.4) that the impact of Green Belt harm in the planning balance should be "*afforded substantial negative harm weight*", we disagree with the conclusion (paragraph 9.5) that 'Very Special Circumstances' exist which clearly outweigh the identified harm, especially given the community alternative is available and should be considered.

For the reasons set out below, in our previous objection and in the report from the independent consultant, we do not believe the benefits of this scheme outweigh the harms and, on behalf of our members, would like to register our wholehearted objection to this application.

Compliance with National Policy

As stated in our original representation, we do not believe this proposal meets the requirements of sustainable development. This can be demonstrated by the lack of compliance with national policy, including the updated NPPF 2026.

Given the equal importance that should be awarded to the economic, social and environmental objectives, changing the route of the eastern part of this proposed road would **NOT** affect the anticipated economic benefits of improving local transport infrastructure. Conversely, not pursuing the least environmentally and ecologically harmful road option **WILL have considerable impacts** on the social and environmental objectives due to, for example:

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- the lack of available funding for public transport services for decile 1 deprived communities, where many households do not have access to a car
- the loss of access to green space for those decile 1 deprived communities
- the fracturing of existing PROWs and permitted active travel routes
- the permanent loss of best and most versatile agricultural land, together with the associated loss of jobs and livelihoods in the rural economy and the loss of local food production
- the loss of climate mitigation opportunities and resilience and an increased risk of flooding
- the huge increase in air, noise, light, vibration, dust and water pollution (and carbon emissions), chronically affecting the health and wellbeing of Trafford residents and local bird and wildlife populations
- the permanent loss of habitats and threatened species
- the fracturing and fragmentation of an important wildlife corridor.

We note that the Environment Act 2021 introduced legally binding targets, including halting the decline in plant and wildlife species and cutting public exposure to PM_{2.5} (which is the most harmful air pollutant for human health). The Environment Act 2021 also introduced the enhanced biodiversity duty which requires public bodies to consider what they can do to conserve and enhance biodiversity. The eastern part of this road solution is non-compliant with those requirements as it will, among many other harms, accelerate the decline of species populations and will cause an increase in public exposure to PM_{2.5}.

We provide below an assessment of the application in relation to the National Planning Policy Framework 2026 (NPPF) and the associated Planning Practice Guidance (PPG).

NPPF 2026 and associated PPG

- As highlighted in our previous response, the scheme **unequivocally does not** comply with what is now policy HC7 (Development affecting existing recreational land and facilities). This policy is not even referenced by the applicant in the Updated Planning Statement. The applicant's response to our previous feedback is that the CRR "*does not in itself generate additional demand for open space, sport or recreation facilities. Paragraphs 103 and 104 are not therefore directly applicable*". This is an astounding assertion given that the policy is not about schemes which generate additional demand, it is about preventing the loss of these facilities, which is exactly what this proposal will do. An assessment which clearly shows "*the open space, buildings or land to be surplus to requirements*" is, therefore, required. Until such an assessment exists, the scheme should be refused.
- The scheme **does not comply** with policy GB6 (Control of development in the Green Belt), as it does not fall into any of the categories set out in GB7 (Development which is not inappropriate in the Green Belt), including GB7 (f) (i), which is mentioned in the Updated Planning Statement (1633333). The impact on the openness of the Green Belt is **NOT** minimised given that there is an alternative solution that does not require harm to the Green Belt or its purposes. That the Updated Planning Statement (paragraph 7.24) dismisses the harm to the openness of the Green Belt as "*moderate*" is disturbing. In addition, this development will have an extremely significant conflict with the Green Belt purposes to the point of creating Grey Belt and causing additional harm through the incitement of speculative development (set out further in the paragraph below). The applicant's analysis (paragraphs 7.28 - 7.33) is disingenuous given that we anticipate they will be aware of the main landowner's intention to develop their entire landholdings.

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- The Updated Planning Statement (paragraph 7.43) incorrectly states that “*There are no alternative sites that lie outside of the Green Belt*”. In addition, the considerations set out at paragraph 7.40 can all be delivered by the community alternative. As the proposal does not satisfy the ‘very special circumstances’, and the policy requires that “*substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness*”, the scheme should be refused as the harm to be caused is not outweighed by its benefits and an alternative **IS** available.
- Policy DP3 (Key principles for well-designed places) requires proposals to respond to their context, so that they “*integrate with and enhance their surroundings*”. The eastern part of this proposal is incompatible with local habitats and land uses. It does not provide “*Liveability*”, nor does it support healthy communities. As mentioned elsewhere, it does not minimise risks, increase resilience nor contribute to climate mitigation/adaptation or to the transition to net zero. In fact, it does the contrary. It also destroys existing green infrastructure and fractures an important wildlife corridor to the point of causing ‘County-scale’ decline in red listed bird species. It removes access to green spaces for two local (decile 1) deprived communities, reducing opportunities for recreation and healthy living, significantly increasing air, noise, light vibration, dust and water pollution. The policy explicitly states that schemes should be refused if they conflict with paragraph 1 of this policy. This proposal should, therefore, be refused.
- The scheme should comply with policy TR3 (Locating development in sustainable locations), which explicitly requires the applicant to take opportunities **to avoid any adverse environmental impacts** and to “*secure net environmental gains such as reductions in air pollution*”. The current proposal does neither, it embeds unsustainable patterns of movement within the New Carrington allocation (and beyond) for the foreseeable future. New Carrington cannot be made sustainable by implementing unsustainable transport options and encouraging increased motor vehicle movements. The Carrington Relief Road does not “*offer a genuine choice of transport modes for residents and users*”. In fact, it does the opposite. Existing well-used active travel routes will be fractured and made unhealthy, unpleasant and unsafe by the introduction of motor vehicle traffic. There is no committed funding to enhance the connectivity of the area by providing improved public transport, despite over 40% of households in parts of Partington and Sale West not having access to a car.
- Policy TR4 (Street design, access and parking) also requires decision-takers to give priority to active travel and access to public transport, and to meet the needs of disabled people, older people and children. Focusing on car/HGV-dependent development does none of those things.
- Despite the number of HGVs that will be using the road, the requirements of policy TR5 (Roadside facilities) have not been met.
- The applicant suggests that a travel plan in accordance with policy TR6 (Assessing transport impacts) is not required because the road itself does not generate traffic. From the perspective of local residents, a road that will ‘draw’ (in the words of the applicant), huge volumes of traffic from the M60, the M6, the M56 and the A56 onto the east and west-bound A6144, via unsuitable roads through villages, is generating additional traffic in the area. It is nonsense to suggest otherwise. We will not repeat the detailed comments from our independent transport consultant about the transport assessment (it is available on the planning portal and on our website [here](#)) but he concludes that (paragraph 4.11) the planning application “*fails to provide sufficient and reliable transport evidence to justify the full CRR (Option F). The modelling shows only marginal transport benefits, contains inconsistencies, and does not adequately demonstrate why the more environmentally damaging Option F should be preferred over Option A*”.

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- Policy TR6 is clear that development proposals should be refused if they would have a severe adverse impact on the transport network, and the current proposal will take the congestion problems from the strategic road network and move them onto the local road network, which is unacceptable.
- Planning Practice Guidance for Transport Evidence Bases in Plan Making and Decision Taking¹ explicitly states that “*where there is known to be a significant level of heavy goods vehicles traffic, a classified count (identifying all vehicles separately) should be provided*” – we cannot find this classified count anywhere in the current documentation. We note that the applicant’s response to our original representation mentions a spreadsheet analysis (‘DfT_Traffic_Counts_for_FoCM.xlsb’), which the applicant states includes 12-hour directional flows, by vehicle type. We cannot trace having received this file, nor can we find it on the portal. Despite suggesting that the proposed development is considered to accord with the various dimensions of the PPG, “*which reflects best practice for sustainable growth and infrastructure led development*” (paragraph 7.58), the Updated Planning Statement does not reference this requirement or the gap in the evidence base.
- Whilst we recognise that the proposal will provide both new connections and improvements to existing active travel routes, including a new Restricted Byway along the southern side of the CRR, the scheme will, nevertheless, fracture existing routes and will make them less attractive due to the huge volume of adjacent traffic and pollution. The proposal, therefore, does not fully comply with the requirements of policy TR8 to protect and enhance the existing network of public rights of way on, across and around Carrington Moss. Conversely, the community alternative, would protect and enhance these PROWs and permitted routes and would also take opportunities to extend, link and improve the quality of all the existing routes.
- The scheme does not comply with policy CC2 (Mitigation of climate change), which specifically highlights the importance of sustainable transport policies and prioritising sustainable patterns of movement to support the mitigation of climate change and the transition to net zero. In fact, this scheme will minimise the amount of funding available for public transport, meaning that opportunities to reduce carbon emissions are not exploited both from the perspective of the potential to reduce traffic and the significant harm to be caused to habitats that can act as carbon stores (rather than enhancing them, or avoiding harm – vegetation loss will be significant, the peatmoss will be damaged as a consequence of the hydrology changes to be implemented by the road and other habitats will be impacted by road run-off and pollution). Significant harms will be caused prior to any mitigation being available as it will not be immediate.
- The scheme also does not comply with policy CC3 (Adaptation to climate change) as it does not minimise vulnerability to the potential impacts of climate change over the lifetime of the scheme. It is not, for example, located where the risk of flooding is minimised, with the Preferred Option Report highlighting that Option F requires 2.5 x more water storage than Option A. It also increases, rather than mitigates, the risk of wildfires.
- We recognise the concerns raised by the Environment Agency in their response (planning portal document reference 1626468). Without the conditions they mention, the planning application does not comply with policies F4 (Assessing flood risk for decision-making), F5 (The sequential test) and F7 (Ensuring development is safe from flooding).

¹ <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>

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- To be clear, residents remain very concerned about the impact of this road on their lives and their livelihoods, including as a result of increased flood risk. It should be noted that neither Partington nor Sale West are affluent areas and many residents may not have insurance cover, nor will they have the funds to replace items if they are damaged/lost. Those same residents are also very worried about the impact on their health and wellbeing as they cannot afford to be ill as a consequence of the pollution and/or increased flood risk caused by this road.
- This application does not comply with policy N2 (Improving the Natural Environment), which requires LPAs to ensure development supports nature's recovery, to seek opportunities to conserve and enhance habitats, landscape character and the natural beauty of the countryside (not to destroy them), to use areas of poorer quality land (not best and most versatile agricultural land), to connect and strengthen ecological networks (not to fracture important wildlife corridors), to conserve and enhance existing natural features (not to obliterate them), to use the green infrastructure and nature-based solutions to secure multiple benefits, including those relating to climate mitigation and recreation (not to eliminate them), to minimise adverse impacts on biodiversity (not to further deplete already dwindling populations of endangered species). Policy N2 (and the Planning Practice Guidance for the Natural Environment²) explicitly anticipates that the mitigation hierarchy will be followed. The first phase of the mitigation hierarchy is **avoidance**, locating the development "*on an alternative site with less harmful impacts*". The LPA should, therefore, be insisting on a review of the community alternative, as lurching straight to phase 2 of the hierarchy (mitigation), when an alternative proposal is on the table, is non-compliant with policy.
- This development will be adjacent to Carrington Moss, a 335 hectare peatmoss that is considered by Natural England to be a restorable irreplaceable habitat. Whilst this road does not pass through the mossland itself, the changes to hydrology (to keep the road drained and water-free) and the potential for contamination from road run-off will be extremely harmful. As an irreplaceable habitat, Carrington Moss is a recognised site of local importance and is complemented by 15 sites of biological importance and a site of special scientific interest in the area, some of which will also be harmed by the air, noise, light, vibration, dust and water pollution caused by the road. Harm to these sites is contrary to policy N6 (Areas of particular importance for biodiversity and geodiversity). The policy explicitly requires that development affecting such sites should not be supported if there would be a significant adverse effect on the integrity of the site.
- Given that this proposal will cause significant adverse effects and that there is an alternative option available, the "*wholly exceptional reasons*" set out in policy N2(2) are not met, especially given the wording in policy N2(3), which confirms that this "*policy applies to development on land inside or outside a designated area, if it would have an impact on the identified biodiversity or geodiversity value of the area concerned*".
- This scheme is not compliant with policy P3 (Living conditions and pollution) which requires development proposals to take into account "*the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment*". Residents will be particularly vulnerable to the effects of the air, noise, light, vibration, dust and water pollution, specifically because of the immense increase in traffic this road will generate. The road will result in "*an unacceptable adverse effect on health and the quality of life*" for residents. The effects will also impact wildlife and birds because the eastern part of the scheme is currently a very tranquil area with intrinsically dark landscapes.

² <https://www.gov.uk/guidance/natural-environment>

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- We note that policy P4 (Impact of development on existing activities) and P5 (Maintaining public safety and security) may be relevant for businesses that currently operate in, or travel through, Carrington Village and those which are actively managing COMAH Zones (they may have to change their current business and safety practices, particularly given the huge increase in the number of vehicles travelling through the area).
- We recognise that there are concerns about the potential for contamination (also raised by the Environment Agency in their response). Compliance with Policy P2 is therefore, essential.
- Some of the plan-making policies are also relevant, policy HC1(Planning for healthy communities), for example, requires development to “*promote the creation of healthy and inclusive places*”. A road scheme which does not address the needs of the many households (over 40% in some parts of Partington and Sale West) without a car is an inappropriate solution.
- Policy DM1 (Preparing development proposals) states that proposals for major development should be informed by early engagement with the local community. As set out in the consultation section below, this did not happen with this scheme.
- Policy TR1 (Vision-led approach to planning for transport) suggests that sustainable transport should be considered “*from the earliest stages of plan-making*”. This policy has not been complied with given that the only option Trafford has considered is one that will increase and embed unsustainable transport in the allocation area for the foreseeable future. Furthermore, there was no early engagement with communities. The proposal does not, therefore, reflect local views as can be seen from the responses to the consultations that have now taken place. The proposal is also not aligned with the aims of the Greater Manchester Transport Strategy. The existing PROWs and permitted routes across Carrington Moss should be protected to widen future transport choice (such as reopening the former railway line for tram transport) as set out in the policy, and as proposed in the community alternative option.
- Policy DM4 (2) identifies the circumstances under which a proposal can be refused on the grounds of being premature. Given that the New Carrington Masterplan has not yet been published, we believe this proposal can be refused on this ground (see paragraph below).

Concerns about the lack of a Business Case

Why do we need a Comprehensive and Transparent Business Case?

Given the amount of public funding to be spent on this road scheme, the current lack of public transport in this area and the availability of a more cost-effective, significantly less harmful alternative, a structured, comprehensive and transparent business case must be made available prior to determination of planning approval.

The benefits-cost ratio (BCR) should be, as a minimum, greater than 1.0 (which would suggest the benefits equal the costs). Any BCR below 1.0 would signal that the road is a poor investment.

Any and all planning conditions, such as those required by the Environment Agency (see document 1626468 on the portal) and those required to mitigate the extensive harms to natural capital and ecosystem services (environmental, ecological and social harms), including the identified compensation for the effects of pollutants on households, should be fully costed within the business case to ensure that the council is not required to fund unidentified expenditure post planning approval.

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The business case should also include all requirements to acquire land, including via compulsory purchase, if necessary, to, for example, provide the mitigation and compensation requirements for the harms to be caused to environmental and ecological assets (this is important given the landowner's intention to develop their entire landholdings).

We set out below the case for a Natural Capital Assessment, given that these harms (and their mitigation) should be quantified and monetised.

The business case should also recognise that the scheme only has a very short lifetime as national and regional policies seek modal change to reduce the amount of motor vehicle traffic. Strategies which aim to achieve the mitigation of climate change and nature's recovery will only accelerate objectives to reduce traffic to deliver significant reductions in carbon emissions, a considerable fall in the prevalence of pollution-related health conditions and support for targets to achieve growth in the populations of declining bird and wildlife species.

Given that Trafford Council is likely to be on the hook for any unexpected or overrunning expenditure, it is important that the business case is reviewed by the Scrutiny Committee. Because of the significant risks to both the council's finances and to its residents, the council's Accounts and Audit Committee should review both the business case and the detailed risk register.

The business case is needed to ensure value for money, to determine whether the benefit-cost ratio demonstrates that the anticipated benefits outweigh the costs of construction and the costs related to the mitigation of the harms to be caused and to provide evidence that this expenditure is justified, particularly given the availability of an alternative that would meet the objectives of this road for a much lower cost, without the harms, mitigation and subsequent costs to be caused by the damage and destruction of natural capital and ecosystem services and without the chronic impact on the financial, mental and physical health and wellbeing of local residents.

The Case for a Natural Capital Assessment

Whilst a Natural Capital Assessment may not be a formal requirement of a planning application, the purpose of an Environmental Statement is to provide a clear, detailed report on the likely significant environmental effects of a proposed development so the local planning authority can make an informed decision. This should include the identification of risks and how effects will be avoided, mitigated or compensated.

A Natural Capital Assessment would be very informative to support this requirement and the latest iteration of the Treasury Green Book³ states, in relation to business case production, (paragraph 8.76) that "*The Environment Act 2021 sets legally binding targets for the government to improve the environment. Practitioners should take these targets into account when developing proposals*".

The Green Book continues (para 8.78) that a "*proposal that directly or indirectly affects natural assets will have an effect on social value. It is thus important to include nature in appraisal*". The Green Book also provides supplementary guidance on accounting for the effects of climate change.

Given the harms to be caused by this road, the production of a Natural Capital Assessment is essential.

3

https://assets.publishing.service.gov.uk/media/698dbcd17da91680ad7f4308/The_Green_Book_2026.pdf



Lack of credibility of Applicant Responses

In the response to the TfGM commentary (1507105), the applicant mentions the Outline Business Case more than 10 times, stating, for example, that:

- *“A draft scope has been prepared for the Outline Business Case (OBC) for the CRR”*
- *“The OBC will combine and appraise the CRR alongside other New Carrington Masterplan transport interventions”*
- *“The forthcoming CRR and New Carrington Masterplan Outline Business Case will assess all relevant impacts and acceptability criteria defined in DfT TAG, HM Treasury Green Book, and GM-specific guidance issued by TfGM”*
- *“The need for further interventions will be assessed through the forthcoming CRR and New Carrington Masterplan Outline Business Case”*

We raised questions about their response in our recent [FOI MP3](#)⁴, because we were confused by *“the references in the response to Outline Business Cases, which are sometimes referred to as the CRR OBC and sometimes the CRR and New Carrington Masterplan OBC”*. We also asked that the applicant *“confirm that these are two separate documents and, with transparency in mind, when they will be available for review”*.

In response the project team answered that they *“are not two separate documents and they do not exist. We do not know when, if at all, they will be created”*.

If they do not exist, and the applicant does not know whether they will be created, why are they mentioned in the applicant’s document? This is not a credible approach.

Furthermore, in response to our original representation, the applicant suggests that the Transport Assessment is not an 'appraisal' in the sense used by DfT (in TAG and in transport business case guidance) and highlights that it does not include all the assessment aspects in TAG, that it is *“an interim submission”* and that the *“wider PfE Masterplan schemes (including CRR) will be fully modelled and appraised, in due course, for planning approval and business case purposes”*.

We remain totally confused by the conflicting responses and believe it is essential that a comprehensive and robust business case is produced and made available on the planning portal well in advance of planning approval.

Local Considerations

Lack of consideration of the community alternative

Neither Trafford nor the project team has considered the community alternative. This is very disappointing, especially given the way Manchester City Council has handled the community alternative solution for Ryebank Fields. Their planning officer has recommended approval⁵ of the proposal to create a community woodland and meadow despite the landowner’s objection and their alternative proposal for residential redevelopment.

In the case of the community alternative for the Carrington Relief Road, Option A was dismissed for inappropriate reasons (predetermining the preferred route option) and as highlighted in our repeated emails, this option could have been articulated as a viable route, particularly given the suggested approach for active travel from the community.

⁴

https://www.whatdotheyknow.com/request/questions_about_crr_response_to/response/3499946/attach/html/2/FOI%203812.pdf.html

⁵ <https://democracy.manchester.gov.uk/documents/s65713/Ryebank%20Fields.pdf>

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This should be reconsidered given the comments from Natural England (that Option F is the most environmentally and ecologically damaging route) and the recent concerns raised by the Environment Agency about the applicant's insufficient assessment to demonstrate compliance with national policy requirements.

An assessment of both options is provided by the independent consultant in his report⁶ which demonstrates that there was a clear case for selecting Option A.

The Updated Planning Statement suggests (paragraph 7.100) that the utilisation of land owned by Wain Estates "*reduced the requirement for any lengthy negotiations which improved the prospects of delivery of the road*". Yet land that is supposedly to be made available for the mitigation and compensation of environmental and ecological harms is now at risk of development due to Wain Estates desire to develop their entire landholdings via the government's Grey Belt policy.

Whilst we acknowledge that PfE includes reference to the Carrington Relief Road, it does not require that the indicative route is the one that is delivered. There is no current evidence that that there is sufficient funding to meet the requirements of the currently proposed CRR, never mind the "*host of other measures to promote modal shift*" mentioned in the application.

We originally requested an opportunity to discuss our alternative with the project team in March 2021. We have repeated that request many times since that date and, so far, neither Trafford nor the project team has given the community (which includes Parish Councils and other community groups as well as FOCM) the opportunity to put our case.

Our investigations show that the Option Appraisal was minimal, in addition to Natural England's commentary that the appraisal presented "*an inaccurate and unbalanced view of the environmental constraints*", the Environment Agency has confirmed⁷ that they "*have not previously been consulted by the council / requested to offer a position upon the potential merits of shortlisted Option A versus Option F or vice versa*".

The lack of available land for active travel that was given as an excuse for dismissing Option A is a fictitious issue given the availability of adjacent, parallel routes. Similarly, the justification we were given at the recent traffic numbers meeting with the project team, in which they stated that the cost of delivering TfGM standards for active travel routes would be prohibitive was also incorrect. A subsequent meeting with TfGM confirmed that the project team's suggestion that 2 way separated cycling and walking active travel routes is a requirement was an incorrect interpretation of their standards.

Existing active travel routes on, across and around Carrington Moss can be upgraded (resurfacing, suitable for horse riders, wildlife friendly lighting and improved signage) at a much lower cost than constructing a new road. This solution will actually encourage modal shift because it will be much easier to persuade people to walk, cycle, or horse ride on safe, healthy and pleasant routes with no motor vehicle traffic. This would reduce the number of vehicles on the road.

⁶ <https://friendsofcarringtonmoss.com/wp-content/uploads/2026/09/260903-motion-final-report-aw.pdf>

⁷ https://www.whatdotheyknow.com/request/environment_agency_response_to_c_2?nocache=incoming-3554977#incoming-3554977

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The community solution offers many more benefits and many fewer harms. It would come at a much lower cost to the public purse, both in terms of the direct costs (the cost of the road itself) and the indirect costs (the increased health service needs). This would mean that more funding could be made available for bus services, school transport and community transport in an area described as a public transport desert. It will also reduce the number of vehicles that will be using the road network.

We note that the Updated Planning Statement suggests (paragraph 7.117) that *“diversion of through-traffic and heavy goods vehicles away from the surrounding residential areas will also improve road safety, reduce noise and air pollution”*. This is an extremely misleading statement. The only part of the area that **MAY** have traffic diverted away is Carrington Village – Ashton on Mersey, Partington, Sale West, and Warburton will all suffer from huge increases in all types of traffic as a direct result of the current road alignment relieving congestion on the motorways.

Trafford should also consider alternative options for reducing the amount of HGV traffic. Back in 2020, the Friends of Carrington Moss and Carrington Parish Council presented the ‘bridge across the Manchester Ship Canal’ option to Salford and Trafford officers. We did a lot of research on the requirements of that solution but, despite this being explicitly set out in the 2012 Core Strategy, Trafford did not progress it.

Not taking the opportunity to reduce the costs to the public purse, when the council’s solution will cause additional costs (due to the acute financial, mental and physical health issues to be caused to residents) is not in the public interest and the lack of consideration of this community alternative should be given **substantial negative weight** in the planning balance.

It should also be noted that focusing public money on funding the community alternative and improved public transport options in the area would also support many of the policies in Places for Everyone, including Policy JP-S1 (Sustainable Development), JP-S2 (Carbon and Energy), JP-S4 (Flood Risk and the Water Environment), Policy JP-S5 (Clean Air), JP-G1 (Landscape Character), JP-G2 (Green Infrastructure Network), JP-G4 (Lowland Westlands and Mosslands), JP-G7 (Trees and Woodland), JP-G8 (A Net Enhancement of Biodiversity and Geodiversity), JP-G9 (The Green Belt), JP-P1 (Sustainable Places), JP-P6 (Health), JP-P7 (Sport and Recreation), JP-C3 (Public Transport), JP-C6 (Walking and Cycling), JP-C8 (Transport Requirements of New Development).

The approach would also support the delivery of regional strategies such as the Greater Manchester Environment Plan and the Greater Manchester Transport Strategy.

Deliberate creation of Grey Belt

Given that Wain Estates has submitted, within their Local Plan response, that they wish to allocate their entire landholdings for development and has confirmed that they will utilise the Grey Belt status to facilitate future speculative development, we would like to reiterate our concerns that Trafford is deliberately creating Grey Belt by constructing this road across the Green Belt.

This approach will so weaken the Green Belt purposes that there is a huge risk that irreparable harm will be caused, resulting in more development in the area, more traffic, more congestion, more pollution, more harm to environmental and ecological assets and more harm to residents.

Given that the community’s alternative solution will not facilitate Grey Belt designation, it will not result in the huge levels of permanent and irreversible damage and destruction caused by the proposed route.



Impact on the New Carrington Masterplan

Approving this application prior to the publication of the New Carrington Masterplan will result in a lack of consideration of the cumulative impact on environmental and ecological assets, including, for example, the cumulative flood risk given that the Eastern and Southern Link Roads are currently planned to cut across the deepest part of the peatmoss, reducing water capture and storage capability and significantly increasing flood risk for local communities. The cumulative impact of air, noise, light, vibration, dust and water pollution on surrounding communities will also not be taken into account.

The Updated Planning Statement highlights (paragraph 7.70) that the GMCA and Trafford “*understand the importance of delivering the Carrington Relief Road to facilitate the regeneration of Carrington*”. Yet that regeneration is evolving and so should the council’s thinking, understanding and analysis. Calculations about future traffic volumes should now take into account what is actually happening in Carrington, not on phantom employment opportunities. There are now 4 Battery Energy Storage Systems proposed, which will not only bring **ZERO** permanent local jobs, they will not generate traffic. Developers are also proposing Data Centres, developments which require a lot of land-take but, typically, create between 20 and 50 permanent roles, much fewer than originally anticipated in the employment zone at New Carrington.

Furthermore, if, as has been promised, there are increased bus services (which could be funded by our alternative solution), constructing additional road capacity costing over £130m, much of which is public money, is not necessary when the alternative is much more cost effective.

The lack of consideration of the cumulative effects should be given **substantial negative weight** in the planning balance.

In response to our original representation, the applicant suggests that “*Trafford Council is committed to undertaking necessary further work, to develop the Masterplan, appraise the full impacts of PfE development and infrastructure, and justify investment*”. We, therefore, believe it is imperative that the planning application is not considered until the New Carrington Masterplan is published, consulted upon and adopted.

Community Consultation:

There has been inadequate community consultation throughout the planning process and, when it has been undertaken, the views of residents have been dismissed:

- communities **were not consulted** about which type of transport options should be prioritised - sustainable passenger and/or freight transport, a bridge across the Manchester Ship Canal or new road capacity
- communities **were not consulted** about the route of the road
- communities **were not consulted** about the New Carrington Transport Strategy
- in relation to the Carrington Relief Road, communities have been **consulted just once** - in 2025 - when, of 751 respondents, **77%** resoundingly confirmed that they were **not in favour** of the road (only 17% were in favour)
- the planning application has so far received around 800 representations of which over **98%** are objections
- for completeness when communities were consulted about the PfE New Carrington allocation, of 867 responses, **over 83% disagreed/mostly disagreed** and only 7.5% agreed or mostly agreed with the proposals.

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With the above in mind, the Updated Planning Statement (document 1633333), particularly paragraph 5.12, appears to misunderstand the main purpose of consultation and does not consider the legal framework set out in the Gunning Principles⁸, which defined that a consultation is only legitimate when its four principles are met.

Suggesting that consultation is just about ensuring members of the public are well-informed is dismissive of the role of residents as a key stakeholder.

It should be noted that the Local Outcomes Framework⁹, which aims to measure, among other things, how communities are empowered, incorporates a number of indicators including for:

- Neighbourhoods (Objective 12) which has an outcome metric about the percentage of people who feel they can influence local decisions – the framework suggests that *“Leaders should ensure that residents feel empowered within their communities, that residents have opportunities to present their views and that these are factored into decisions”* – it is clear from the lack of consideration of the community alternative, the missed opportunities to seek resident inputs, as well as the lack of responsiveness to the consultation results set out above, that many Trafford residents would not respond positively to questions related to empowerment
- Environment, circular economy and climate change (Objective 13), which includes metrics about deaths from particulate air pollution (PM2.5), flooding and climate mitigation, as well as the percentage of local sites in positive conservation management
- Transport and Local Infrastructure (Objective 14), which includes metrics related to the Connectivity score for public transport to key services (DfT Connectivity Tool), passenger journeys on local bus services per head by local authority and the percentage of adults who engaged in active travel at least twice in the last 28 days.

Given the outcomes that residents will endure as a consequence of the current proposal and the information set out above, consultation should be given **substantial negative weight** in the planning balance.

CRR Project Team Response to FOCM Representation

We highlight here some issues related to the applicant’s response to our original representation, which are concerning for several reasons.

Cumulative Traffic Volumes

In their response to our original representation, the project team states that the CRR *“will feature a range of improvements aimed at enhancing transport efficiency which will not only lead to quicker journey times for personal vehicles, but also for public transport too”*. As confirmed by our independent transport consultant, the traffic modelling *“shows only marginal transport benefits, contains inconsistencies, and does not adequately demonstrate why the more environmentally damaging Option F should be preferred over Option A”*. Those marginal benefits include potential journey time improvements of *“up to one minute during the PM peak”*. Spending over £100m of public funds for such marginal benefits is not in the public interest and does not represent value for money.

⁸ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

⁹ <https://www.gov.uk/government/publications/local-outcomes-framework/local-outcomes-framework-priority-outcomes-and-metrics--2>

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The latest graphic (Figure 2-3 - New Carrington Allocation - Estimated AADT flows in 2045) in the updated Transport Assessment suggests that between 30,000 and 50,000 vehicles will travel down the Carrington Spur on a daily basis, that around 10,000 turn off towards Ashton on Mersey and around 20,000 to 30,000 head towards Carrington and will be travelling adjacent to active travel users. This will make the route unpleasant, unhealthy and unsafe for users.

The graphic also identifies immense traffic growth for Partington and Warburton, even if the Eastern and Southern Link roads are approved. Currently the average daily traffic flow on the A6144 between Broadway and Lock Lane in Partington is around 7,300 vehicles. In the graphic, it shows that, by 2045, the predicted average daily number of vehicles at the same location will be **between 20,000 and 30,000**. The average daily traffic flow on the A6144 at the junction of Warburton Lane and Moss Lane is currently 5,000 vehicles. In the graphic, it shows that, by 2045, the predicted average daily number of vehicles at the same location will be **between 20,000 and 30,000**.

Our [recent blog](#)¹⁰ further examines this graphic to determine local impact. The currently proposal drives much of this growth, due to the intention to 'draw' traffic from the M6, the M60, the M56 and the A56 onto this route. The community alternative solution would not be an attractive choice for motorway users, as can be seen from current traffic volumes.

Further feedback about the Transport Assessment is covered in the independent appraisal conducted by a qualified transport consultant, which is available on the planning portal and on our website¹¹.

Biased approach to assessment

On the one hand the applicant states (in relation to our concerns about the risk that the road will turn the Green Belt into Grey Belt) that *"This application is responding to an allocation in the PpE. Future applications on land surrounding the CRR at a future date is a matter for third parties, and is not the responsibility of the applicant"* (which we acknowledge is correct). Yet, despite the speed and road safety measures through Carrington Village not being provided by this scheme, the applicant references these as a benefit of the CRR.

This is a very biased approach to considering the implications of the scheme. The fact that works to existing highway do not require planning permission, so traffic calming measures do not form part of this application, is not relevant. There should be balance in the claims being made.

If there is recognition that the scheme will facilitate benefits that are outside the scope of the development, there should also be acknowledgement of all the harms that will be caused explicitly by this scheme, including those that will need to be addressed by other parties and those that will be caused to the area outside the redline boundary.

¹⁰ <https://friendsofcarringtonmoss.com/2026/08/31/why-is-trafford-pushing-ahead-with-the-most-harmful-route-option-for-the-carrington-relief-road/>

¹¹ <https://friendsofcarringtonmoss.com/wp-content/uploads/2026/09/260903-motion-final-report-aw.pdf>



Understating the harms to be caused by the road

There is also a lack of acknowledgement of the misrepresentation of the harms to be caused by the road. Stating that the traffic modelling approach, which excluded huge volumes of traffic from the figures, “*was agreed with Trafford Council's Strategic Planning and Growth team*” does not change the fact that huge volumes of traffic have been excluded from the figures (and, therefore, from the Environmental Impact Assessment, which understates the environmental, ecological and heritage risks). It should be noted that the ‘Transport Assessment Scope for CRR Planning Application’ was **NOT** released for public consultation or comment.

Whilst we welcome the enhancements to parts of the PROW network, this does not resolve the problem of active travel users being exposed to huge levels of air pollution if they are walking, cycling or horse riding adjacent to huge volumes of car and HGV traffic. Nor does it address our concerns that the existing active travel routes have been significantly undervalued and will be unnecessarily fractured.

Whilst we appreciate the new Restricted Byway that is proposed along the southern side of the CRR, the scheme will, nevertheless, fracture existing routes and will limit horse rider facilities as the response confirms that “*Cycle lanes and cycle tracks are not intended for equestrian use and do not confer rights for horse riders*”.

The data relating to all pollutants must be substantiated. The assessments appear to be inadequate. Diffusion tubes, for example, do not measure PM_{2.5}, which the government suggests is the most harmful air pollutant. Specific justification must be given for the predicted reductions to vehicle emissions as, even with an increase in the number of electric vehicles, the immense volume of future traffic means that PM_{2.5} (non-exhaust particle pollution) will significantly increase, with an impact on both human and wildlife populations, including those who are expected to walk, cycle or horse ride adjacent to the traffic. The impact on children's lungs, for example, is highlighted in this article¹².

The applicant suggests that “*it is highly unlikely that HGV traffic will continue to use the A6144*” but businesses in Carrington have made it clear that the existing road is an essential route and stated (in response to another planning application) that, under no circumstances must this route be restricted for use by tankers and other vehicles. The planning application is not clear about how the proposed change to HGV access to the A6144 has been communicated to businesses.

Overstating the Benefits

Repeating the rhetoric in the planning application documentation is not helpful. There is no guarantee that any Partington or Sale West resident will be offered even temporary employment. There is also no mention of the jobs in the rural economy that will be lost as a consequence of building the eastern part of this road across best and most versatile agricultural land.

The data related to beneficial changes to noise pollution still requires substantiation. The impact of changes in noise levels must be based on the cumulative traffic volumes that will be experienced should this road be approved (not numbers which exclude much of the anticipated traffic).

¹² <https://www.theguardian.com/environment/2026/aug/18/ulez-better-lung-size-function-london-children>



We note that the applicant did not comment on our concerns about the difference between the Amey CRR Topic presentation¹³ (which highlighted that, having analysed the number of PIAs, the accident rate is less than expected for typical roads of this type) and what is now set out in the planning application documentation. The Updated Planning Statement repeats the biased response based on data about collisions that are outside of the jurisdiction of the scheme. We reiterate that the CRR represents a very small part of any journey, and the documentation confirms that active travel routes beyond the red line boundary will not be improved by the scheme. The immense volume of additional (redirected) 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 acknowledge that the huge reduction in traffic on the motorways may bring benefits to Holcroft Moss, given that motor vehicles will be redirected onto the Carrington Relief Road, which will cause severe levels of harm to local habitats of biological importance.

For the reasons we mention in our representations, the benefits set out in the planning application documentation, including the Updated Planning Statement, could be also delivered by the much more sustainable, more cost effective and less harmful community alternative, so should not be accorded weight in the decision-making process.

Outstanding Information

Whilst we very much appreciate the time given to FOCM at the recent traffic number meeting, we are still awaiting the information from both this meeting and in response to our FOI requests. This data is crucial. Without it we do not see how Trafford can determine a response to the planning application. If it is already available, we are not aware of any reason why it cannot be shared.

CRR Traffic Numbers Meeting

This meeting was held on 20th July, following which it was agreed that the following would be provided:

- Select Link Analysis Figure 1 is strange because traffic disappears after going to/from Urmston – **Project Team Action: Tim to check this figure and provide numbers**
- No Journey Time Savings information is available – **Project Team Action: Mark to discuss with team to determine what can be made available**
- Lorraine shared the figures from the FOCM traffic counts compared to the data set out in the Environmental Statement Volume 3 (Appendix 5.1) - there is a huge difference in the HDV figures. **Project Team Action: Tim to check numbers in Appendix 5.1**

Modelling Tools

- Clarification Questions in the Agenda*: **Project Team Action: Mark to review and provide a formal response**
- FOI Requests: **Project Team Action: Tim is working on responses and will share traffic modelling spreadsheets**

*Traffic Meeting Agenda: Clarification Questions:

1. Whilst the Transport Assessment suggests that the CRR is not a viable end point for the New Carrington Allocation, the planning application only appears to provide the CRR only case – is the information available for the CRR+ scenario?

¹³ <https://www.youtube.com/watch?v=L3uG5SzmzjA>

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2. The data in the planning application appears to indicate that the CRR will make a relatively small difference to peak hour traffic flows, with this in mind:
 - a. What location is Manchester Village referring to?
 - b. Is the business case available?
3. Much of the existing traffic will not use the proposed Option F route due to the destinations being Urmston and Sale West – how has this been factored into the business case?
4. Please explain the figures behind figures 6.1 and 6.2 of the Transport Assessment as they appear to be inconsistent (note [FOI request](#))
5. In relation to the route options – please provide the exact figure for the peak journey savings for both options (the report uses the phrase 'up to') and the off-peak journey times/savings.
6. Please explain the derivation of the daily flows presented using an example calculation.
7. On a daily basis the changes in traffic flows between route options A and F appear inconsistent on the existing Carrington Spur, Carrington Lane and CRR - please can you explain why?
8. We would like to discuss the impact of the CRR on existing active travel routes (both PROWs and permissive routes), including what is demonstrated in the design work and how active travel users will connect to the wider network.

Outstanding FOI Requests

There are several outstanding FOI requests, including:

- [FOI LR1:](#)

Refers to FOI request 3524 and, in particular, the flowcharts on pages 3 and 4 of that response, request asks for confirmation of the following;

- 1) What precisely is the location with the title 'Manchester Village'?
- 2) What precisely is the location with the title 'Access'?
- 3) What is the source of these traffic figures?
- 4) How have the figures been calculated and what assumptions have been made?

- [FOI LR2:](#)

Request to clarify who has classified the A6144 as a Bee Network Active Travel Route, because not only are there no cycle lanes on the A6144, there is no mention of the A6144 on the TfGM Active Travel website <https://beeactive.tfgm.com/schemes-near-...>

- [FOI MP1:](#)

As mentioned above, this request asks that the team provide the detailed data (peak and off peak) that will enable us to understand the numbers behind figures 6.1 and 6.2 of the Transport Assessment Report 15357381.

- [FOI MP2:](#)

Request to ascertain how HGV numbers and traffic volumes related to all development already approved has been incorporated within the calculations and asking for a summary table showing the baseline data (including the date of this baseline), how traffic volumes for development already approved within the New Carrington Allocation has been treated, how the traffic volumes for development not yet approved within the New Carrington Allocation has been treated, how traffic volumes for relevant local schemes (particularly those in Partington and Sale West) that are outside the New Carrington red line boundary have been treated.