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Planning Committee Report 118033 Carrington Relief Road

1 message

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Dear Planning Committee

We are very disappointed to note that the Officer's Report recommends approval of the Carrington Relief Road planning application, subject to 38 conditions, especially given:

- the lack of genuine consideration of the communities' alternative option
- the dismissal of the extensive and continued lack of support for the eastern part of the route, expressed by surrounding communities in response to the 2025 consultation, via objections to the planning application and in response to our recent petition
- the superficial nature of the environmental assessments (pointed out by statutory consultees as well as FOCM and other respondents), resulting in many of the human, environmental and ecological effects inappropriately being deemed insignificant
- the incitement of huge levels of additional (speculative) development due to the enablement of the Grey Belt designation
- the lack of compliance with national planning policies
- the lack of compliance with a published masterplan for the area
- the lack of scrutiny on a publicly available business case
- the complete lack of consideration of a sustainable transport-led solution (to ensure New Carrington is a sustainable community built around public transport hubs rather than 4 major new roads (which will embed car-dependency in current and new communities for the foreseeable future).

For those who are interested, we set out more detail in the paragraphs below and note that, with 38 conditions, it is clear that the planning application is incomplete, that much has not been subject to public scrutiny and cannot, therefore, be properly determined. We would encourage you to ask specific questions about the 'so called' benefits. What **are** the actual expected improvements in journey times, for example, (as they have not been disclosed).

Furthermore, it is unclear whether the Council has complied with Regulation 64 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and we are seeking legal advice on this and other matters.

We believe that approval of this very harmful planning application, including in relation to the health and wellbeing of citizens and species, and the unfair burden it would place on current residents, their children and their grandchildren, could result in a huge loss credibility and a longer term loss of trust in terms of public confidence in the Council, particularly given the acknowledgement that residents will need to be compensated as some of the harms cannot be mitigated.

We would hope to avoid this scenario and also recognise that legal action will result in huge costs for both the community and the Council and would, if a judicial review is permitted, cause a delay in the development of the road.

With this in mind, we do believe there is a compromise option which could be considered by the Planning Committee, which would be to progress the western part of the road scheme without delay and to subject the eastern part of the scheme to further review, including a detailed

consideration of the solution put forward by communities, with the expected outcome being to minimise the harms to be caused to humans, to the environment and to habitats and species.

We have been granted £10,000 by the Foundation for Integrated Transport to support a more detailed independent assessment of the community option and will progress this whichever outcome is agreed at the Planning Committee.

When considering the information before you, it should be recognised that, at a very high level, National Planning Policy considers that 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 and this planning application does not achieve that. Our analysis confirms that the proposed development is **NOT** in accordance with the development plan when taken as a whole, including the relevant policies of the NPPF, and we would urge the planning committee to reject this proposal in its current form.

Kind regards

Marj Powner

Chair, Friends of Carrington Moss

Non-Compliance with Regulation 64 of the EIA Regulations

Regulation 64 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 requires:

"(1) Where an authority or the Secretary of State has a duty under these Regulations, they must perform that duty in an objective manner and so as not to find themselves in a situation giving rise to a conflict of interest.

(2) Where an authority, or the Secretary of State, is bringing forward a proposal for development and that authority or the Secretary of State, as appropriate, will also be responsible for determining its own proposal, the relevant authority or the Secretary of State must make appropriate administrative arrangements to ensure that there is a functional separation, when performing any duty under these Regulations, between the persons bringing forward a proposal for development and the persons responsible for determining that proposal".

Holgate J (as he then was) considered Regulation 64(2) in *London Historic Parks and Gardens Trust v SSHCLG* [2021] JPL 580, QB. He held at paragraph 94: "*independence requires in the present context that:*

(i) the functions of the competent authority under the EIA Directive be undertaken by an identified internal entity within the authority (including any officials assisting in those functions) with the necessary resources and acting impartially and objectively;

(ii) the prohibition of any person acting or assisting in the discharge of those functions from being involved in promoting or assisting in the promotion of the application for development consent and/or the development;

(iii) the prohibition of any discussion or communication about the Holocaust Memorial project or fund [i.e. the project in question in that case], or the called-in application for planning permission between, on the one hand, the Minister of State determining the application and any official assisting him in the discharge of the competent authority's functions and, on the other, the Secretary of State or any official or other person assisting in the promotion of the project or the called-in planning application or any other member of the government; and

(iv) the prohibition of any person involved in promoting or assisting in the promotion of the application for development consent and/or the development from giving any instructions to, or putting any pressure upon, any person acting or assisting in the discharge of the functions of the competent authority, or from attempting to do so, in relation to those functions".

It is unclear what measures the Council has put in place to ensure that the requirements of Regulation 64 have been met. Committee members should not approve the development without being satisfied that Regulation 64 has been complied with.

Lack of impartiality

We are concerned that there is a demonstrable lack of impartiality in the officer's report.

The Planning Balance section, for example, inappropriately accentuates the benefits and minimises the risks. This scheme will **not** create a sustainable new community; it will create car/HGV dependent sprawl. It will **not** reduce traffic, congestion or accidents on the existing A6144. The planning application documents confirm that the road will facilitate a significant increase in traffic, which will result in an associated significant increase in pollution and collisions. It will **not** provide improved connectivity or accessibility for Partington, particularly for the many households that do not have access to a car. Yet substantial positive weight is afforded to these criteria.

The weight given to the negative aspects of the scheme is minimised:

- The impact on environmental and ecological assets and species will be significant and immediate. The benefits are not available in the short term and are not proven. The long term nature of the mitigation and compensation proposals increases the risk that they will not be delivered and that irreversible harms will be caused to habitats and species. Yet only moderate weight is attached to this.
- Similarly, the huge impact on landscape character is also only afforded moderate weight despite the long term nature of the mitigation proposals.
- Even the huge level of harm to residents from the effects of, for example, noise pollution, is only awarded moderate weight, even though some of the harm cannot be mitigated.

In addition, this is a very short, very expensive road option that will reach capacity within a short lifespan. It **may** provide some benefits to Carrington Village but none for anyone living elsewhere on the A6144. Currently walkers, cyclists and horse riders can use very safe, very healthy, very pleasant active travel routes. In the future, they will be travelling adjacent to over 30,000 highly polluting motor vehicles a day, many of which will be HGVs carrying hazardous materials, resulting in long term exposure to the associated pollutants, exacerbating chronic disease (such as asthma) and causing debilitating health conditions (like lung cancer, strokes, ischemic heart disease, and COPD).

The officer concludes that the benefits of this development substantially outweigh any adverse impacts (paragraph 316). Given the evidence available within the planning application documentation, the responses from statutory consultees (and others) and the outstanding issues that have not yet been scrutinised, we believe this is an erroneous conclusion. We consider that the extensive adverse effects of this development on climate mitigation, nature's recovery and human health to far outweigh the suggested benefits, particularly given the availability of an alternative solution.

The report is also selective in the information included and makes no mention of the concerns raised by statutory consultees (and others) about the superficial nature of the applicant's environmental assessment and other documentation.

The Environment Agency response, for example, is not fully reflected in the report. There is no reference to their assertion that they *"would likely become minded to object"* without the conditions they propose due to the "***insufficient assessment***" of flood risk and "***insufficient evidence/design/commitments***" within the Environmental Statement.

CTO Polyfins raised concerns about (among other issues) whether the COMAH Zone Risk Management Strategy is fit for purpose and concluded that "***the LPA cannot lawfully determine this application on the basis of a promise to carry out a risk assessment after planning permission has been granted***". Resolving important issues post approval is inappropriate as it means that there is no requirement for public consultation on the final documentation or agreements.

The report makes no mention of the findings of the independent expert transport consultant we commissioned. He reviewed the planning application and option appraisal documentation and attended a meeting with the project team. His full report is available on the planning portal and on our website here. His overall conclusion is that the planning application fails to provide sufficient and reliable transport evidence to justify the development. 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. He highlighted that a detailed analysis of the Route Option Criteria has been undertaken which clearly demonstrates that Option A should have been considered the preferred option.

The report does highlight some comments made by those responding, including in paragraph 295, for example, in which the officer confirms SP Energy Networks object to the proposed development due to

a lack of policy compliance. The officer suggests that an updated position will be provided in the Additional Information Report, which is referred to several times in the document, including in relation to the feedback from the Acoustics Consultant. We have been advised that this Additional Information Report will not be available until late in the day of the Committee meeting, meaning that it is unlikely communities will have the opportunity to provide any feedback on this very important issue in advance of the decision. This is unfair and unreasonable.

The officer also appears to have accepted the applicant's statements without addressing the comments received within representations. In paragraph 80 for example, the officer's discussion on induced traffic has not taken into consideration the representation from transport expert Lisa Hopkinson (1626132 on the portal), which refers to her many published works about induced traffic, along with other evidence.

In this case, it appears that the applicant has not followed government guidance on modelling, has not assessed induced traffic in the assessment and has not provided any evidence or a source for the +10% significance threshold. The officer's assertion that the *"applicant has advised that analysis of the CRR, as a standalone scheme, will not cause significant induced traffic"* is not based on an appropriate assessment of induced car or freight traffic. The CRR Transport Assessment used a model which is not the preferred approach recommended by TAG (Transport Analysis Guidance), and which does not specifically measure induced traffic. Despite the official government guidance (TAG Unit M2.1) on Variable Demand Modelling, it appears that the effects of variable demand on scheme benefits have not been estimated, and no compelling reason for not doing so has been given.

The officer should have considered the detailed points in the representation, which highlighted that no evidence was provided to support the Technical Note statement that the CRR "*will not result in a significant induced traffic effect*". No evidence is presented as to the origin of the so-called 'threshold' of significance, and why +10% is considered impactful and anything below that would not be significant. There is also no evidence that the journey times, and, therefore, the level of induced traffic on a number of routes, will be over 5% in the short run (7 years) and approaching or exceeding 10% in the long run (22 years). The expert author's conclusion is that the applicant's Technical Note contains unevidenced assumptions and makes an unsubstantiated and erroneous claim that the level of induced traffic on the proposed road is unlikely to be impactful. These issues should have been referenced by the officer to bring balance to the report.

The officer has not questioned the conflicting evidence submitted within the planning application. There is a recognition, paragraph 86, that the CRR will facilitate "*smoother traffic flow from the M6 to the M60, reducing congestion on the M56".* The CRR is a very short part of this journey, and all such traffic must then use the west-bound A6144. According to the planning application, this, along with the volumes associated with the proposed New Carrington developments, results in a substantial (**between 300% and 600%**) increase in traffic through Partington, Warburton and the villages beyond. Not only is the road unsuitable for such colossal increases in vehicle volumes but, in addition to the increased congestion and potential for accidents, the impact from all pollutants, particularly $PM_{2.5}$ (which will still be a huge issue even when electric vehicle uptake increases substantially) cannot be considered insignificant, as suggested in the environmental statement.

Paragraph 86 also suggests that substantial traffic is drawn "*away from the A6144 and local roads around Sale*". Traffic is **only** drawn away from Carrington Village – not from the east and west bound A6144. The report acknowledges that the CRR will cause higher volumes of traffic on Manor Avenue, whilst reducing the number of vehicles using the A56. Again, the health and wellbeing impact on residents is not considered.

We note that paragraph 165, which discusses issues related to the Holcroft Moss SSSI, confirms that the scheme will also lead to "*a very small reduction in traffic flows"* on the M62. It seems the strategic road network benefits substantially from this development, whilst the local road network suffers the effects of huge increases in traffic.

The officer highlights that New Carrington is "*the largest allocation in the Western Gateway and in the Places for Everyone Joint Development Plan"* and suggests (paragraph 2) that public transport improvements are also required to deliver a sustainable community, that these transport solutions "*are interlinked, and none can come forward without the other".* Yet no public transport initiatives are being proposed and there is no information about what will be provided and when. Approval of this scheme will result in deeply entrenched car dependency in New Carrington for the foreseeable future, as the huge costs of this road will minimise the future funding available for public transport initiatives, especially if there is an overspend on the road budget.

There has been a very selective review of policies. In relation to the Trafford Core Strategy, we have previously highlighted to you that the planning inspectorate reduced this road to a £3m link. That spatial plan identified other Transport initiatives, including public transport and a bridge across the Ship Canal, which have not been progressed by Trafford despite the Chair of Carrington Parish Council and the Chair of Friends of Carrington Moss presenting their research on the bridge option to Salford and Trafford Officers back in 2020.

In progressing the CRR, Trafford is taking forward the most unsustainable transport option, without any consultation with communities on their preferred priority. In addition, the officer does not mention that the Core Strategy (policy R4.5) protected the agricultural land in this location "*as an important resource for Trafford's local economy*".

Paragraph 90 does not appear to show an independent assessment of the application against the plan policies. If the officer can arbitrarily decide that there is no need for the CRR itself to deliver the bus priority measures required by policy JPA30, this gives communities no certainty about the status of the policies within the development plan. In addition, there is no mention of what communities have signalled they would like to see delivered. We are also surprised that the planning officer is considering the cost effectiveness of the bus priority measures. This is surely a matter for the applicant and should be immaterial to the planning decision.

In relation to active travel, in paragraph 96 the officer has only highlighted comments from those who are supportive of the scheme, not the huge number of comments received from horse riders, from Walk Ride GM and other representations, such as our own, which raise concerns about the proposal to fracture existing routes and expose users to huge levels of pollution. The current proposal also leaves the remaining extensive footpaths and bridleways on, across and around Carrington Moss in continued decline.

Lack of Compliance with National Policy

The NPPF states that its policies "*are material considerations which must be taken into account in decision-making*" and that the "*purpose of the planning system is to contribute to the achievement of **sustainable development**, by managing the use and development of land **in the long-term public interest***".

It cannot be considered either sustainable or in the long term public interest to cause such significant destruction of natural capital assets (including taking 40 hectares of productive best and most versatile agricultural land out of use - 22 hectares permanently), to undermine ecosystem services (particularly increasing local flood risk), and to cause County-Scale decline to red listed birds and other endangered species. It is not sustainable or in the long term public interest to cause such extensive harm to human health that those affected will require compensation, nor to plan to increase local road traffic by between 300% and 600%.

We believe the application is not compliant with the following NPPF policies:

- Policy CC2: Mitigation of Climate Change
- Policy CC3: Adaptation to Climate Change
- Policy GB6: Control of Development in the Green Belt
- Policy GB7: Development which is not inappropriate in the Green Belt
- Policy DP3: Key Principles for Well-Designed Places
- Policy TR3: Locating Development in Sustainable Locations
- Policy TR4: Street Design, Access and Parking
- Policy TR5: Roadside Facilities
- Policy TR6: Assessing Transport Impacts
- Policy TR8: Public Rights of Way
- Policy HC7: Development affecting existing recreational land and facilities
- Policy P2: Ground Conditions
- Policy P3: Living Conditions and Pollution
- Policy P4: Impact of Development on Existing Activities
- Policy P5: Maintaining Public Safety and Security
- Policy F4: Assessing Flood Risk for Decision Making
- Policy F5: The Sequential Test
- Policy F7: Ensuring Development is Safe from Flooding

- Policy N2: Improving the Natural Environment
- Policy N6: Areas of Particular Importance for Biodiversity and Geodiversity

Our reasons have been set out in our planning application representations. We will not repeat all of them here but highlight specific concerns with the officer's interpretation of NPPF policies.

Green Belt Policy (GB7)

In relation to the question about whether the transport infrastructure is required in a Green Belt location, we disagree that the existing A6144 at Carrington Lane would not be a suitable alternative to building new road capacity across environmentally and ecologically rich Green Belt land, in combination with the other improvements set out in the Community Alternative Option, discussed further below, which has not been satisfactorily considered by Trafford.

This scheme **does not comply** with GB7 because the impact on the openness of the Green Belt is **NOT** minimised given that there is an alternative option that does not require harm to the Green Belt or its purposes. There is also a significant conflict with the Green Belt purposes to the point that the eastern part of this road, along with other roads planned in the New Carrington allocation, will weaken those purposes, enabling the Grey Belt designation to be used by landowners, causing additional harm through the incitement of speculative development.

In addition, whilst paragraph 28 asserts that the "*carriageway and active travel would not necessarily harm openness since the land would remain 'open', although it would be constructed at a higher level than the existing ground level*", it is clear that there would be significant visual intrusiveness, especially given the character of the area and the flat topography. The officer acknowledges that the cumulative impact of both traffic generation and visual intrusion will be substantial and would fail to preserve openness.

Whilst the officer suggests that applicant has sought to minimise the impact on openness, the availability of the community alternative indicates that the impact on openness has not been minimised as far as is possible. The communities' alternative option deserves a fair hearing, which it has not yet had from Trafford.

Given that the landowner has signalled that they intend to develop their entire landholdings (in their local plan response) and that they have requested that the land take for active travel and environmental/ecological mitigation is reduced (in response to this planning application), it is very concerning that the officer considers the approval of the eastern part of the route will not weaken Green Belt purposes a (check unrestricted sprawl) and b (prevent neighbouring towns merging). Furthermore, given that Trafford has ignored the PfE planning inspectors' recommendation at paragraph 641 of their report (not to permit developments on a piecemeal basis), and the requirements of JPA 30 criterion 1, approving a number of planning applications in advance of the New Carrington Masterplan, it is clear that the CRR is not a material consideration in relation to purpose e (assist urban regeneration), particularly as many of the developments being proposed are for uses that do not result in significant traffic impacts when operational (BESS and Data Centres, for example).

The landowner has indicated that they will use Grey Belt designation to secure approval of future speculative development. In addition, the report signals that the southern and eastern link roads will be proposed across the deepest parts of the peat, once again enabling additional speculative development in what is supposed to be a green (and Green Belt) corridor.

It is, therefore, rather optimistic to assume that such applications will not be approved given the planning inspectorate has already overturned Trafford's decision relating to the application for Wildfowl Farm and what is happening elsewhere in the country (where the Grey Belt designation has resulted in huge losses of Green Belt in many areas, including in those where a local plan exists). With the anticipation that Grey Belt developments will be proposed and approved if the eastern part of this road scheme goes ahead, the conflict with purpose c (safeguard the countryside from encroachment) would be substantial (not insignificant).

With our feedback above in mind, we believe the road **is** inappropriate development as a result of both the impact on openness and the significant conflict with the Green Belt purposes.

Assessing Transport Impacts (TR6)

The officer has accepted the applicant's very narrow view of the term 'generate' in relation to the additional person trips this road scheme will facilitate. Criterion 1 of this NPPF policy does not

distinguish that traffic movements should just be those directly 'generated' by the scheme. Criterion 3 explicitly states that the assessment should include "*potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself*".

As set out in the planning application documentation, the scheme will generate significant amounts of movement and should, therefore, be supported by a *"travel plan, which indicates how sustainable transport objectives will be delivered, monitored and managed over time*" in accordance with policy TR6. Whilst the officer recognises (paragraph 73) that the CRR will affect travel and route choice, resulting in the redistribution of trips, the lack of a travel plan means that there is no separated estimate of HGV traffic (as required by Planning Practice Guidance) and no indication of how the redistributed trips are expected to be minimised by the implementation of sustainable transport options in the future.

The New Carrington Transport Strategy (which was not subject to public consultation) envisages a 74% car mode share, with 26% non-car and 17% internal trips. This is not the epitome of sustainable development. Calculations in the Transport Strategy document were based on so-called comparable development sites in South Gloucestershire, all of which have access to railway stations (unlike New Carrington).

Our independent transport consultant found the Transport Assessment to be unreliable, containing inconsistencies and showing only marginal benefits. This leaves a disconnect between the anticipated transport movements for this planning application and reality, which could also affect future decisions about individual planning applications which will directly generate additional traffic movements.

The officer suggests (paragraph 73) that "*that the whole of the allocation requires the whole of the infrastructure, and a piecemeal approach is not appropriate"* but there is no indication of what is being proposed, when the funding for the other elements of the infrastructure will be available, no masterplan, no timetable and no detailed travel plan, which is contrary to national policy.

Criterion 4 of NPPF policy TR6 suggests that development proposals "***should be refused if they would have a severe adverse impact on the transport network***" including for cumulative impacts. Given that the road facilitates an increase in traffic movements of between 300% and 600% for the A6144 through Partington – this cannot be considered as anything other than a severe adverse impact and as there is no Travel Plan, there is no indication of "*how sustainable transport objectives will be delivered, monitored and managed over time".* The policy does not differentiate between a brand-new vehicle trip generated by a new housing or employment development or an existing vehicle trip that is reassigned from other roads. If the combined total creates severe congestion, it triggers the TR6 refusal threshold. It should be noted that this aspect of policy TR6 explicitly refers to construction traffic as well as operational, so the construction movements of other developments should be incorporated within the Travel Plan.

Policy DP3 (Key principles for well-designed places)

This policy, which is only fleetingly mentioned in the officer's report, requires (paragraph 1) proposals to respond to their context, so that they *"integrate with and enhance their surroundings".* The policy explicitly states that schemes should be refused if, without clear justification, they conflict with paragraph 1.

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. 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 (decile 1) deprived communities, reducing opportunities for recreation and healthy living, significantly increasing air, noise, light vibration, dust and water pollution.

The eastern part of the route would have a speed limit of 40mph, which will decrease, rather than increase road safety in the area. The surrounding area is a wildlife corridor, which is well used by both humans and wildlife. There are regular sightings of deer, there are known to be nocturnal endangered wildlife creatures and, of course, there are over 1,000 horses stabled on and around Carrington Moss. The planning application suggests there will be around 30,000 vehicles travelling along this part of the

route. Many of the over 3,000 HGVs a day will be carrying hazardous materials. A dangerous combination.

Policy HC7: Development affecting existing recreational land and facilities

The officer has not mentioned this policy, which explicitly states that development proposals should **not** result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other formal and informal play space and allotments. The area affected by the eastern part of this scheme is recreational land and the scheme **does not** comply. Trafford has not produced an assessment which clearly shows this open space *"to be surplus to requirements".* This is, therefore, required prior to the grant of planning permission.

P3 (Living conditions and pollution)

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 due to traffic volumes and because the eastern part of the scheme is currently a very tranquil area with intrinsically dark landscapes.

In paragraph 203, the officer sets out the properties to be impacted, the residual significant effects following mitigation and the need for compensation. The applicant has not considered the effects on many properties that will be impacted by huge increases in traffic volumes, caused by the road but which are outside the red line boundary, such as those on the A6144 through Partington, Warburton, Sale West and Ashton on Mersey.

It is incomprehensible that a road which facilitates the huge increases in traffic volumes confirmed by the planning application results in an insignificant effect on air quality (paragraph 211). If there is an increase in traffic of between 300% and 600%, there will be a corresponding increase in, for example $PM_{2.5}$, which poses serious health risks, contributing to respiratory, cardiovascular, neurological, and systemic diseases, and is linked to millions of deaths worldwide.

It is inappropriate that residents are expected to keep their windows closed or not use their gardens to escape the impact of road noise or other pollutants. It should be noted that the residents of Astley are currently preparing for a Traffic Commissioner's Inquiry, which could have a far-reaching impact on the transport operator's activities. The issues that have been raised by residents on that site have resulted in reputational damage to the Council, the developer and the transport operator.

Flood Risk Policies

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 (both are decile 1 deprived communities) 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.

The Option Appraisal confirmed that the Council's preferred route requires 2.5x more surface water storage than the alternative. The officer (paragraph 259) accepts the applicant's assessment that the majority of the site is at a low risk of surface water flooding. There is no mention of resident feedback on this issue.

We are unsurprised by the concerns raised by the Environment Agency and United Utilities in their responses. Without the conditions they highlight, 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).

We would reiterate that the increased risk of flooding is a key issue for local communities and resolving these concerns **after** planning approval, as is currently proposed, is unacceptable.

Policy N2: Improving the Natural Environment

The officer confirms the extensive amount and range of habitat loss, fragmentation, disturbance and pollution, with the potential to cause direct mortality or injury, with ongoing ecological pressures once the road is operational, especially given the fragmentation of existing habitats and the wildlife corridor, including disturbance as a result of lighting and traffic noise. Whilst the GMEU accepts that new landscaping along the route could achieve habitat gains **in the very long term**, there will be a significant and immediate impact on species populations. The GMEU recommends a mitigation and compensation strategy for protected nocturnal species, along with Barn Owls, Bats, and breeding birds (particularly the skylark).

Given that the State of Nature Report confirms that the UK is "*now one of the most nature-depleted countries on Earth*" and that Councils have an Enhanced Biodiversity Duty, it is utterly shocking that the applicant and the Council have not seriously considered the alternative option put forward by communities as it does not result in the extensive environmental and ecological harms this route option will bring.

We totally disagree with the Council's contention at paragraph 193 that significant harm cannot be avoided through locating the development on an alternative site. Nor do we agree that the mitigation proposals adequately compensate for the harms to biodiversity because those harms will occur during construction and there is a long period of significant harm (with no evidence that habitats and species will be able to recover) before the mitigation areas are established.

This application does not, therefore, 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 Environment) 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".* To achieve impartiality, the officer should, therefore, have insisted on a detailed 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.

Policy DM4: Emerging development plan proposals

In terms of the design of the road, the officer confirms (paragraph 66) that it is intended to operate as part of a coherent transport package for the allocation but there is no visibility of the plan for that wider package, no understanding of the funding for public transport, for example, and no confirmation of future sustainable transport options, including in relation to reopening the former railway line or utilising sustainable freight transport options. Due to the very superficial nature of the Environmental Assessment, there is also no understanding of the cumulative impact on environmental or ecological assets, for example. Until the New Carrington Masterplan is produced, consulted upon and adopted, the application is premature and should be refused in accordance with NPPF policy DM4.

Community Alternative

The consideration of alternative sites is a requirement of the Environmental Impact Assessment (EIA) Regulations. Whilst there was an Option Appraisal and a Preferred Option Report, the process was flawed and predetermined as set out in our representation and in the report from our independent transport consultant. The Environment Agency **was not** asked to participate (despite the extent of surface water captured and stored on and around Carrington Moss), Natural England described the process as **"*inaccurate*"** and **"*unbalanced*"** and the Executive Report did not consider either Natural England's feedback or the alternative option put forward by three parish councils and three community groups.

There was no public consultation about any of the route options and no consideration of a solution that prioritised sustainable transport despite the local and regional policies and strategies and the fact that

New Carrington was the largest allocation in what became Places for Everyone.

The officer suggests (paragraph 44) that there was a public consultation on the two preferred options in 2021. This is incorrect. There was no consultation. The public were **only** invited to comment on a video produced by the project team. It was in March 2021 that the three parish councils and three community groups had a meeting with the project team in which the alternative community option was first proposed because it was clear that Option A had been incorrectly presented as an undeliverable solution. It was unreasonable of Trafford to dismiss the alternative option put forward by communities without a detailed examination of its benefits.

At a meeting with the project team on 21st July this year, we were advised that the communities' alternative solution was dismissed because it was considered the costs of meeting TfGM's requirement for state of the art (2 way separated cycling and walking) active travel routes would be prohibitive. We subsequently requested clarification from TfGM and they confirmed that this was a misunderstanding of their PROW standards.

The officer has taken the applicant's assessment of the Preferred Options at face value. Our independent transport consultant reviewed the evidence and concluded that, having completed a detailed analysis of the Route Option Criteria, it was demonstrated that Option A should have been the selected preferred option. This expert review is available on the planning portal but has not been considered in the officer's report.

The officer has also dismissed the communities' alternative option (paragraph 51) without any engagement, analysis or scrutiny - for inappropriate and arbitrary reasons. Given the flawed nature of the Option Appraisal, this is unreasonable and suggests that the predetermined decision to select the most harmful route has cascaded from the original decision to this officer's report.

It should be noted that, despite the number of existing businesses and the impact on COMAH zones, for example, Trafford considers it is appropriate to upgrade the existing road in the western part of the scheme but, inconsistently, not that in the eastern part, which benefits from proximity to the current active travel routes, which are traffic and pollution-free and could be upgraded in line with the communities' solution (including appropriate surfacing for all users, wildlife-friendly lighting and improved signage) for a fraction of the cost of constructing the eastern part of the route.

NPPF 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 options Trafford considered are those that will increase and embed unsustainable transport in the allocation area for the foreseeable future. There was no public transport focused alternative when the Options Appraisal was considered. Furthermore, there was no early engagement with communities as discussed in the section below. The proposal does not, therefore, comply with this policy or reflect local views as can be seen from the responses to the consultations that have now taken place. The existing PROWs and permitted routes in the area should be protected to widen future transport choice (such as reopening the former railway line) as set out in the policy, and as proposed in the community alternative.

In addition, following the Council's formal refusal to consider the alternative option proposed by communities, we submitted a Freedom of Information Act request, which was due for response today, and which, among other things, should provide access to the detailed assessment which determined that the communities' proposal was not viable or suitable for inclusion in the Executive Report of 27 September 2021.

It is irrational for the Council to refuse to fully consider an alternative option that is more cost effective, less environmentally and ecologically harmful and more beneficial for residents, and which can meet the need set out in the New Carrington Masterplan. We concede that what the alternative does not do is reduce congestion on the motorways and replace it with congestion through villages along the A6144.

Community Consultation

We are astounded that the officer's report would, with impartiality in mind, suggest that there has been "*extensive*" community consultation. This is totally incorrect. The Council states that this proposal has been in the development plan since 1996. If that is the case, why was there no consultation about it until 2025?

The report demonstrates that the Gunning Principles have not been adhered to. These are the legal standards which define that a consultation is only legitimate when the following four principles are met:

- proposals are still at a formative stage, and a final decision has not yet been made, or predetermined, by the decision makers
- there is sufficient information to give 'intelligent consideration' - the information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
- there is adequate time for consideration and response - there must be sufficient opportunity for consultees to participate in the consultation
- 'conscientious consideration' must be given to the consultation responses before a decision is made - decision-makers should be able to provide evidence that they took consultation responses into account.

Given that, in response to the 2025 consultation, 77% of over 750 respondents did not support the road, that over 900 individual objections have been received in relation to the planning application (with only 2 expressions of support) and that there are over 1,200 signatories supporting the recent petition requesting that Trafford adequately consider the community alternative solution, we do not think Trafford is able to demonstrate that conscientious consideration has been given to the vast majority of the feedback from residents.

The officer suggests that "*Whilst the former railway line is a significant opportunity in providing a sustainable transport corridor through the allocation, in the short to medium term this is likely to be active travel only*". This is not a decision that has benefited from community input. We disagree with the intention to turn the former railway lines into 'strategic non-vehicular' routes and to destroy the Burford Bridge. These proposals have not been subject to public consultation and we would wish to ensure they do not restrict the potential for the former railway lines to be brought back into use for sustainable passenger and freight transport in the future.

Furthermore, consultation has been extremely limited:

- Communities **were not** consulted about which type of transport options should be prioritised (sustainable passenger and/or freight transport, for example, 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
- Communities **were not** consulted about the Interim Developer Contributions Formula

In addition, no Business Case has been made available for public consultation, so it is impossible to determine whether this scheme represents good value for public money.

Business Case

As you will have seen from our previous email, we are very concerned about the lack of a publicly visible business case for the Carrington Relief Road, particularly given the investment of more than £100m of public funding for very marginal benefits and a lack of understanding about which organisation is on the hook for any unintended overspend.

The officer suggests that the many transport solutions proposed for New Carrington "*are interlinked, and none can come forward without the other".* We would, therefore, anticipate that a business case would include all such schemes and show when those initiatives will come forward and how they are funded. We would also expect communities to be consulted on all the proposals.

The alternative community option would deliver significant benefits for a much lower cost, would not cause the huge and costly environmental and ecological harms, including to Trafford householders. This means that more public funding would be available to be spent on improving public transport in areas where over 40% of households do not have access to a car.

Given the amount of public funding needed, it is important that the applicant confirms that the road does deliver a positive benefit/cost ratio. Approval of the most appropriate solution should surely be predicated on which option delivers the most public benefits, causing the least harm, at the lowest cost to the public purse.

Other Discrepancies

Lack of Relief for Partington

We note that paragraph 68 acknowledges that the road will **not** provide any relief to Partington. The officer suggests that the road will bring benefits in terms of improved connectivity, improved public transport and active travel and that the southern and eastern link roads are intended to improve conditions for Partington. This is incorrect, according to the planning application documentation.

Paragraph 119 of the officer's report suggests that the "*TA demonstrates the scheme would not have a severe adverse impact on the transport network in terms of capacity and congestion, including cumulative impacts, or an unacceptable impact on highway safety*".

Again, we disagree, the graphic in the Transport Assessment showing the Indicative AADT in 2045 shows immense traffic growth for Partington and that, even when the eastern and southern link roads are in place, the AADT between Broadway and Lock Lane will increase from c**7,300** vehicles today to between **20,000** and **30,000** and the AADT at the junction of Warburton Lane and Moss Lane will increase from c**5,000** vehicles to between **20,000** and **30,000.** These are increases of between **300% and 600%** and they are not reflected in the officer's report.

There is also a discrepancy in what the Transport Assessment and other communications have led communities to believe and what Trafford is now presenting to the planning committee. The TA suggests (paragraph 8.1.24) that the CRR "*is a proposed infrastructure project designed to address longstanding transport challenges in the Carrington and Partington areas of Trafford*", yet the officer states that the "*purpose of the CRR is **not to** improve traffic conditions through Partington*". In fact, the officer makes it clear that the permission is being sought for the road principally to enable the developments proposed in PfE to go ahead.

Supporting Employment

It is important that there is trust and transparency in the reporting. It is rather misleading to describe New Carrington as a future sustainable community. The employment developments, for example, are not bringing the anticipated levels of permanent employment. There are now 5 Battery Energy Storage Systems either approved or proposed for New Carrington. These facilities bring **ZERO** permanent jobs. The local landowner has indicated that they intend to develop data centres on the site (and there is already a proposal for the Energy Park at the former power station). These developments bring much lower permanent employment density per m^2 than other sectors.

It is also clear that Trafford's rural economy is not afforded the same level of importance given the lack of effort to address the permanent loss of over 22 hectares of best and most versatile agricultural land. Paragraph 38 confirms the substantial effects the scheme will have on a local farmer, **including a reduction in income.** Given this impact and the National Security Report, which highlights the importance of food production and future food security, it is astounding that Trafford has not sought to prioritise a detailed examination of the alternative proposed by communities.

Indicative Allocation Plan in PfE

Paragraph 144 states that it is *"important to note that PfE establishes the principle for the CRR and that a new road between Carrington and the Carrington Lane/Carrington Spur junction on an alignment consistent with that shown on the Indicative Allocation Plan in PfE would inevitably have an impact on the character of the landscape and on visual amenity*".

It is also important to note that the PfE Planning Inspectors explicitly mentioned (paragraph 639 of their report) that requiring adherence to picture 11.48 "*could lead to unhelpful unintended consequences when the more finely grained and detailed masterplan is being considered. It should be made clear, therefore, that this plan is indicative only so not to prejudice the masterplan.*".

The PfE plan does not require the route of the road to be sited as indicated on this graphic and it is inappropriate for an independent assessment of the planning application to suggest otherwise!

Landscape and Visual Impact

It should be noted that the officer's report (paragraph 147) confirms that, whilst the harms will be caused during construction, the benefits of mitigation and compensation will not be evident until maturity, which will be more than **15 years later.** So, whilst the assessment is that there will only be

'*slight adverse*' effects, this is not the case for the first 15 years or more. The same applies (paragraph 154) to the impact on residential properties, where the effects are considered to be '*slight adverse*' **after year 15.** That is a long time to live with harm that could be mitigated by an alternative option.

Equalities

Trafford should not be planning to increase the inequities for the two decile 1 deprived communities that will be significantly impacted by this development. NPPF policy HC1(Planning for healthy communities) requires development to "*promote the creation of healthy and inclusive places*". A road scheme which does not address the needs of the many households without a car is an inappropriate solution. In addition, this scheme will cause extensive air, noise, light, vibration, dust and water pollution, including such severe impacts for some residents that there is no potential for mitigation.

Despite no mention of the impact on these two decile 1 deprived communities, paragraph 294 suggests that all equality issues have been considered in the design of the proposed scheme.

---------- Forwarded message ---------
From: **Friends Of Carrington Moss** <friendsofcarringtonmoss@gmail.com>
Date: Sun, 6 Sept 2026 at 09:30
Subject: Briefing re the Carrington Relief Road - filling the gaps
To: Hartley, Benjamin <benjamin.hartley@trafford.gov.uk>, <sue.maitland@trafford.gov.uk>, <zak.deakin@trafford.gov.uk>, <phil.eckersley@trafford.gov.uk>, Daniel Jerrome <daniel.jerrome@trafford.gov.uk>, <meenakshi.minnis@trafford.gov.uk>, <tony.obrien@trafford.gov.uk>, <shirley.procter@trafford.gov.uk>, <ulrich.savary@trafford.gov.uk>, <clare.sheridan@trafford.gov.uk>, <michael.taylor@trafford.gov.uk>, <gareth.twose@trafford.gov.uk>, James Wright <james.wright@trafford.gov.uk>, <david.acton@trafford.gov.uk>, <olly.baskerville@trafford.gov.uk>, Evans, Nathan <nathan.evans@trafford.gov.uk>, Leicester, Jane (Councillor) <jane.leicester@trafford.gov.uk>, Newgrosh, Julian <julian.newgrosh@trafford.gov.uk>, O'Sullivan, Dolores <dolores.o'sullivan@trafford.gov.uk>, <kevin.procter@trafford.gov.uk>
Cc: Fisher, Adrian <adrian.fisher@trafford.gov.uk>, Coley, Rebecca <rebecca.coley@trafford.gov.uk>, Gore, Richard <Richard.Gore@trafford.gov.uk>

Dear Planning Committee Member

We would like to provide some additional information to that covered in the briefing on 3rd September, and hope this will be helpful when you are considering the approval of the planning application. We have tried to keep this to factual information rather than straying into the merits of the case (we will produce another document when the planning application comes before committee for approval), so we have not, for example, included an assessment of non-compliance with national plan policy.

Our aim is to ensure that community needs are met, rather than dismissed, that the road does not become a developer's charter, a regional patsy and/or an environmentally/ecologically harmful monstrosity that will facilitate such huge levels of traffic through Partington and Warburton that it will cause chronic financial, mental and physical health issues.

Please do take the time to read our inputs and we would be happy to clarify any queries you may have.

- **History:**
  - the Planning Inspectorate examining the 2012 Core Strategy explicitly reduced what is now being labelled the Carrington Relief Road to a £3m minor road solely for the purpose of connecting to the development site
  - previous development plan documents (the Core Strategy and the UDP) identified other **essential** transport initiatives, including (for example) improvements to public transport and a bridge over the Manchester Ship Canal, which have not been progressed by Trafford, are not currently funded and, in fact, public transport services in the area have been severely depleted during these plan periods
  - in those previous development plan documents, the peat moss and the agricultural land were protected from development as their natural capital value was recognised
  - the regional Transport Strategy (TfGM) aims for 50% of trips to be made by sustainable modes by 2040, with **NO** net increase in motor vehicle traffic
  - the region has also determined that it will be carbon neutral by 2038
  - you were told at the briefing that you cannot "*unpick*" PfE but other councils in GM are doing just that – Wigan Council, for example, has said in relation to the Gibfield allocation that "*it will not be backing the proposals, despite the site being allocated for development in Places for Everyone*" (article here) and it is only the dire political deadlock at Oldham that has prevented further action following the government blocking its bid to totally withdraw from PfE
  - whilst the Carrington Relief Road is mentioned in PfE, the route alignment can be changed
  - despite being the largest allocation in PfE, New Carrington will be centred around 4 major new roads, **NOT** public transport hubs and **NO** sustainable freight options have even been contemplated – leading to

deeply entrenched, unsustainable car and HGV dependent development, which will not support national, regional or local objectives, nor the health and wellbeing of local communities.

- **Green Belt v Grey Belt:**
  - the council released 169 hectares of Green Belt at Carrington when Places for Everyone was adopted - the remaining Green Belt was supposed to be protected until the end of the PfE Plan Period (2039)
  - the Labour government has now introduced the Grey Belt designation, and this has already been used by developers to remove Green Belt for a Battery Energy Storage System in Carrington (Trafford refused this development but the decision was overturned and approved by the planning inspectorate)
  - the main landowner for the New Carrington area submitted, in their Local Plan response, that they wish to allocate their *"entire landholding"* for development (including for "*data centres and energy uses*"). This includes the land that is currently in the retained Green Belt, and they indicated that they would use Grey Belt designation to facilitate this
  - constructing the eastern part of this road across the fields (and, for completeness, the Eastern and Southern Link roads too) will turn the retained Green Belt into Grey Belt as the roads will significantly weaken the Green Belt purposes.
- **Community Consultation:**
  - 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 (they were merely asked to raise any questions they had about a video produced by the CRR project team)
  - communities **were not consulted** about the New Carrington Transport Strategy (in which meaningless comparisons were made with areas that have train stations and other extensive sustainable transport options)
  - 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.
- **Business Case**
  - no business case is available for scrutiny (it should be noted that the Treasury Green Book rules require harm to natural capital to be included in the assessment), this should be publicly available prior to the decision about the road being made
  - a cost of £130m was quoted in relation to the road, this figure could be significantly exceeded as there has been no opportunity to review whether it comprehensively and transparently covers all the costs to be incurred, particularly to ensure that the local public purse does not have to pick up any omissions
  - £90m has been funded by the region, presumably because the road will reduce congestion on the motorways (see below)
  - confirmation was given that £16m has already been funded by developers and other sources
  - this leaves a shortfall of over £20m – there should be clarity about the source of that funding
  - many road schemes overspend their budgets (for example, in 2025, North Yorkshire council agreed to fund the overspend of **£11.7m** on the Kex Gill bypass, and in 2026, the Queensway Gateway road in East Sussex ran **£5m** over budget), and it is currently not clear which organisation is on the hook for any overspend in relation to the CRR
  - if £90m of regional funding is invested into building new road capacity, where does the funding for public transport improvements for New Carrington come from? This is important because **over 40% of households** in parts of Partington and Sale West do not have access to a car (ONS data) and, if sustainable transport options are not provided in advance of the developments, modal shift will be very difficult to achieve.
- **Anticipated Traffic Volumes:**
  - as you can see from this graphic, the planning application confirms that the road will bring immense traffic growth to 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 further examines this graphic to determine local impact **as the currently proposed route of the road drives much of this growth**.

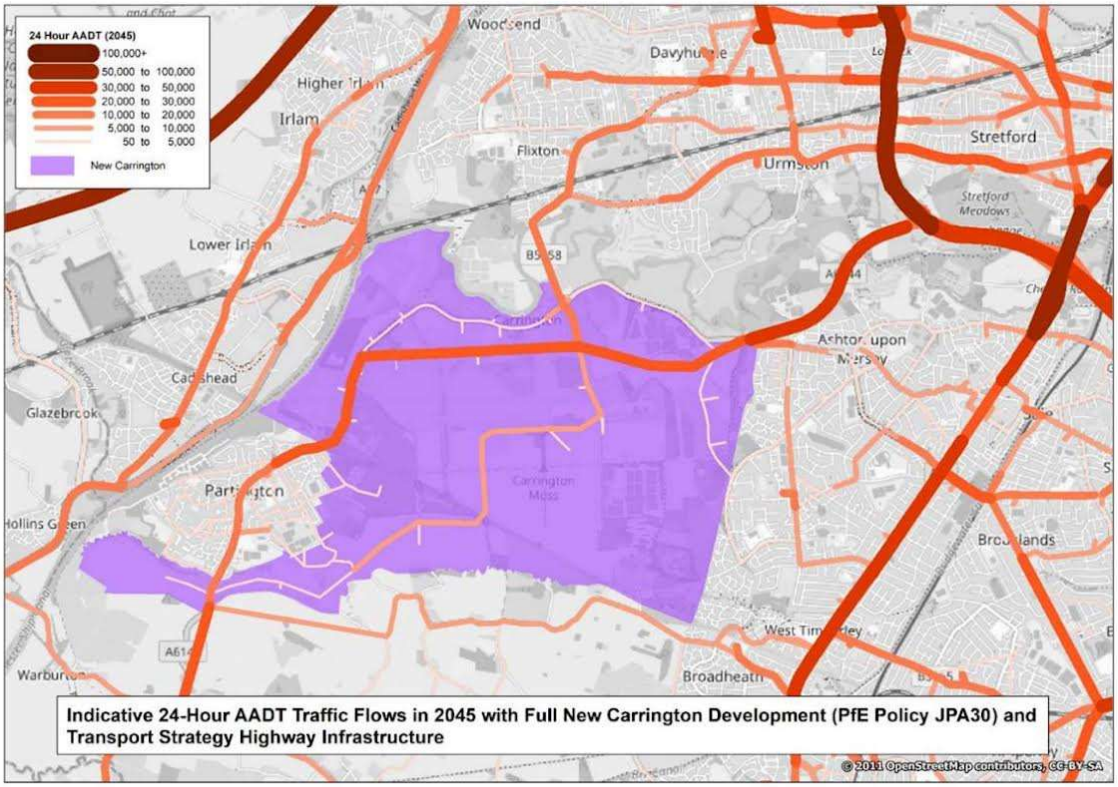


Figure 2-3 - New Carrington Allocation - Estimated AADT flows in 2045

- the planning application confirms that the road will 'draw' traffic from the M60, the M6, the M56 and the A56 onto the CRR and then onto wholly unsuitable minor roads through villages. This will be of benefit to the region because it will reduce congestion on the motorways. It is, therefore, no surprise that Trafford has been awarded £90m of regional funding to support the construction of the road.
- it will not be of benefit to Trafford residents, particularly the over 40% of households which do not have access to a car. Yet those residents will suffer significant harm from the financial, mental and physical effects of the resulting congestion, air, noise, light, vibration, dust and water pollution, the flooding and the loss of well used green space.
- there is a huge amount of evidence of the harms caused by all types of pollution. In relation to air pollution, for example, the government says "*Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy*".
- Partington residents already suffer a higher prevalence of chronic disease than national and regional averages, as confirmed in the Trafford Health Inequalities Data Report (2022), which highlights that those who present at Partington GP practices have a much higher prevalence of asthma, COPD and cardiovascular disease, for example
- there is now also strong evidence about how to prevent these harms, with road traffic being a particular issue. Prioritising sustainable passenger and freight transport would reverse the worsening chronic health conditions suffered by local communities. Prioritising additional road capacity will clearly exacerbate the harms, including to the most vulnerable people in our society. This is not compliant with the public sector equality duty as they will be disproportionately harmed by the effects of the huge increase in traffic numbers.
- in relation to noise pollution, we do not believe the 'noise bunds' will protect residents from the effects of the proposed huge volumes of traffic. This is likely to result in a situation such as that experienced by residents in Astley, where they are unable to sleep at night due to the constant noise pollution. This has been partially mitigated at that site as the occupier has agreed to end all night-time transport operations between the hours of midnight and 6am but this sort of solution will not be possible for a road scheme.
- we commissioned an independent transport consultant and their expert appraisal (which is available on our website here) suggests that the Transport Assessment submitted with the planning application is inadequate, with concerns about the reliability and soundness of the traffic model. Their report advises that the data provided by the applicant cautions that journey time savings are **only "*up to 1 minute lower*"** than the alternative and, therefore, with such a low level of benefit, the proposed route does not actually demonstrate genuinely improved journey times or journey time reliability. Their appraisal also confirms that there are limited benefits through Carrington Village and that the stated benefits of the CRR are marginal
- we also note that a 4th Battery Energy Storage System has now been proposed for the New Carrington area, this means 4 times the risk of fire and toxic fumes but in relation to the need for this road, these sites bring ZERO permanent local jobs, which means that the commercial zone and the CRR will not deliver the anticipated employment benefits for local residents.

- **Environmental and Ecological Impact:**
  - questions were raised by a Planning Committee member about the Skylark mitigation – what was not confirmed at the meeting was that constructing the eastern part of this road will cause **"County" scale decline** to already red listed bird species (this wording is from the planning application) – other species will also be significantly impacted – when the applicant suggests that the "*magnitude of this impact is likely to reduce over time as local bird populations become habituated to ambient noise*", we believe this indicates a huge lack of understanding of the level of harm to be caused to existing populations of threatened species and a lack of consideration of the Council's responsibilities, including its enhanced biodiversity duty (mandated by the Environment Act 2021, which requires public authorities to enhance biodiversity as well as conserve it)
  - as the planning committee will be aware, planning rules require the mitigation hierarchy to be enacted, this requires applicants and councils to manage and reduce the negative impacts of development on nature. The sequential decision framework **must** be followed (steps **cannot** be omitted to get to the desired option) – the first step is **avoidance** (preventing harm before it happens **by choosing an alternative location** for the development) – an alternative route **IS** available to Trafford as set out below
  - as you can see in the email trail below, Natural England had some strong words for Trafford about the approach taken to assess the environmental and ecological risks during the option appraisal process. There has been **NO** meaningful comparative assessment of the route options and Natural England considers the chosen route to be much more damaging than the alternative
  - constructing the eastern part of this road across the best and most versatile agricultural land is contrary to national policy and will impact Trafford's ability to deliver the core and opportunity areas set out in the Local Nature Recovery Strategy
  - the attenuation ponds were mentioned, but it was not confirmed that this route requires 2.5 times more water capture and storage than the alternative and communities believe the applicant has significantly underestimated the impact of concreting over this land, especially given the increased incidence of extreme weather
  - in addition to flood zones, the Environment Agency also produces a flood risk map relating to surface water flooding, which shows the area is impacted whichever level of likelihood is chosen (the existing extent of water capture can be seen on the Carrington Lake page of our website - it must be noted, however, that currently the peatland can soak up huge volumes of water in the area, but when the peat is extracted to enable development, such as for the construction of the Eastern and Southern link roads, and is replaced by crushed stone, for example, with little or no water retention capacity, flood risk in the borough will drastically increase)
  - the presence of pylons was confirmed, and the road will dip under these points, which will make it vulnerable to flooding in extreme weather
  - the peat moss **will be impacted** by the changes in hydrology due to the need to drain the area to keep the road water free
  - road run-off will also cause significant harm to ecology and biodiversity, particularly given the number of HGVs travelling along the route (many carrying hazardous materials)
  - we could not hear what was said about the Eastern and Southern Link Roads but it should be recognised that the current plan is to construct these roads across the deepest part of the peatmoss, totally destroying what Natural England considers to be a restorable, irreplaceable habitat.
- **Route Option Appraisal:**
  - for the reasons set out in the email below, we believe the route option appraisal was flawed, imbalanced and predetermined
  - no alternative option has been genuinely appraised as part of the planning application process which is not compliant with national planning policy
  - we commissioned an independent transport consultant and their assessment (which is available on our website here) includes a review of the route options appraisal. Their assessment demonstrates that Option A (upgrading the exist road) performs much better than the proposed route and does not cause the harms the eastern part of the road will trigger
  - when the route option was agreed by Trafford's Executive, **the feedback from Natural England** (raising concerns about the credibility of the appraisal and recommending environmental and ecological constraints be given appropriate weight when considering the route of the road) **and local communities** (requesting that our alternative option be considered as Option A was incorrectly articulated as an undeliverable route) **were omitted from the report**.
- **Community Alternative:**
  - the community has repeatedly asked Trafford to consider an alternative since 2021, we have now made the formal request set out in the email below
  - our alternative is more sustainable and much more beneficial to local residents. It achieves the Option Appraisal criteria and is also more cost effective and much less environmentally/ecologically harmful than Trafford's preferred CRR route. It will enable funding to be allocated for public transport, will support local, regional and national objectives and will actually enable delivery of modal shift
  - the community alternative option, which was created following discussions between the Friends of Carrington Moss, Parish Councils and other community groups, in summary, comprises opening the existing A1 route to bypass Carrington Village, a short link (running parallel with Isherwood Road between the A1 junction with Isherwood Road and Carrington Lane) to bypass the new homes on Isherwood Road, upgrades to the existing A6144 (resurfacing, removing potholes, improving signage) and, crucially, improvements to the public rights of way and permitted routes on, across and around Carrington Moss (including resurfacing, low-level wildlife-friendly lighting and better signage), leading to much greater

levels of modal shift, encouraging residents to walk, cycle or horse ride using pleasant, healthy and safe alternatives to the road network (these are peaceful routes with no harmful traffic related pollution).

Kind regards
Marj Powner
Chair, Friends of Carrington Moss (https://friendsofcarringtonmoss.com/)
Vice Chair, Save Greater Manchester Green Belts Group (https://www.savegmgreenbelt.org.uk/)
Vice Chair, Community Planning Alliance (https://www.communityplanningalliance.org/)

---------- Forwarded message ---------
From: **Friends Of Carrington Moss** <friendsofcarringtonmoss@gmail.com>
Date: Sun, 16 Aug 2026 at 16:13
Subject: CRR Alternative Community Option
To: Fisher, Adrian <adrian.fisher@trafford.gov.uk>

Dear Adrian

I am writing on behalf of the communities surrounding Carrington Moss who would like the community alternative to the Carrington Relief Road to be considered in a fair and balanced way, with the needs of local residents and the environment at the heart of the decisions that are subsequently made.

You are aware that the Friends of Carrington Moss (FOCM), along with Parish Councils and other community groups, have repeatedly proposed an alternative community solution to the current route of the road. An alternative which is more sustainable, more beneficial to local residents and one which will actually promote modal shift. This alternative achieves the Option Appraisal criteria and is also less expensive and less environmentally/ecologically harmful than Trafford's preferred CRR route, which will cause (according to the planning application) 'County-scale' decline in red listed bird species and will 'draw' traffic from the M60, the M6, the M56 and the A56 onto wholly unsuitable minor roads.

I am sure that you are also aware that 77% of the 751 respondents to the first CRR consultation in 2025 said they were not in favour of the road and that the planning application has already received almost 800 objections (98.3% of representations).

New Carrington is the largest development in PfE, but there is no confirmed funding to improve public transport for the very deprived (decile 1) communities on either side of the peat moss. Despite over 40% of Partington and Sale West households not having access to a car (according to ONS data), it seems the masterplan will be focused around 4 major new roads, rather than sustainable passenger and freight transport hubs, locking communities into car dependency for the foreseeable future.

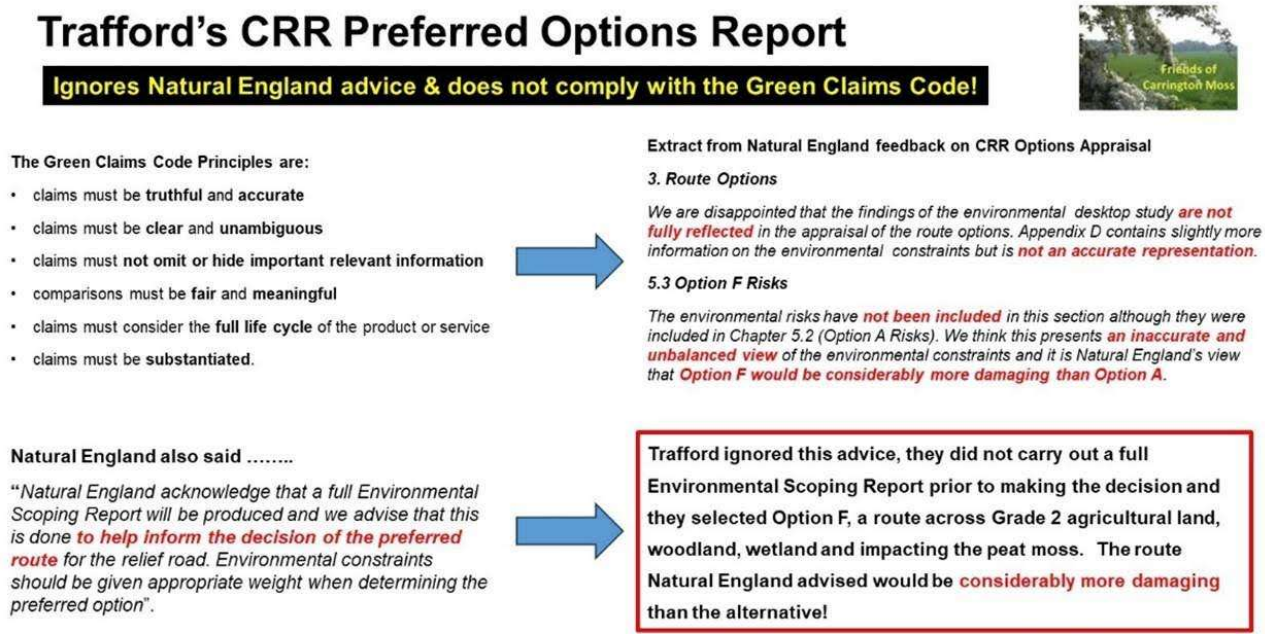
At a recent meeting, the CRR project team stated that the community alternative was dismissed as a potential solution because it was considered the costs of meeting TfGM standards for PROWs and permitted routes would be prohibitive. The project team asserted that these standards include 2 way active travel routes, each with separated cycling and walking facilities. We had a subsequent meeting with TfGM, which confirmed that this is a 'misunderstanding' of their requirements. For PROWs and/or permitted routes, TfGM would require accessible, 3m wide, shared use paths, which would clearly not result in the expense anticipated, so it was inappropriate to reject our solution on cost grounds.

Among other points, that meeting with the CRR project team also revealed that the traffic modelling in the Option Appraisal was unreliable, that information in the appraisal document was based on out of date data, and that it was a very crude assessment which required a number of assumptions and manual interventions to be made. We were informed that, in summary, the traffic numbers in the Option Appraisal are an historic piece of work that is no longer relevant to the planning application and that the data included in the Option Appraisal was not reviewed or updated for the planning application.

This means that no alternative option has been genuinely appraised as part of the planning application process.

The decision about the Preferred Option resulted in the most environmentally and ecologically destructive, and least sustainable, option being chosen despite the alternative suggested by local communities and the concerns of Natural England at the time. Those concerns were disregarded and were not included in the report to the Executive. Naturally we are extremely concerned that the outcome of the Options Appraisal was, therefore, flawed, and that the process was neither fair nor transparent due to the lack of consideration of that feedback.

Given the comments received from Natural England in response to the Option Appraisal process (summarised in the graphic below), and the extremely harmful environmental and ecological consequences of the current choice of route, we believe it is essential that the mitigation hierarchy is followed and that the alternative route is fully assessed.



It is clear from the information recently provided and the confirmation in the 'Induced Traffic Technical Note' that Trafford's preferred route will be at capacity by 2040 (less than 14 years away), that investment in sustainable passenger and freight transport is urgent and must be prioritised. This can only be done by minimising spend on increased road space.

We understand that the only funded transport intervention for the New Carrington area is the CRR, which is contrary to the objectives of PfE and the vision set out in the Greater Manchester Transport Strategy. In addition, the planning application indicates that, in drawing traffic from the motorways, the CRR will increase air, noise, light, vibration, dust and water pollution (to say nothing of carbon emissions), resulting in increased prevalence of chronic long term health conditions such as asthma, COPD, and cardiovascular disease, which are already a factor for Partington residents, with the Health Inequalities Report (2022) showing significantly higher incidence than the averages for England or Greater Manchester.

Existing communities are keen to have meaningful input into the development of New Carrington, and, whilst we note the Council's concession, in their recent legal action, about "*the importance of consultation*"[1], we recognise that challenge would equally apply to the New Carrington Transport Strategy, for which there was no consultation.

With all the above in mind, we'd like to formally request that the community alternative is reconsidered to ensure procedural fairness, that sustainable transport is prioritised and that a valid alternative is considered within the planning application process, rather than any approval merely being a 'tick in the box'.

Our aim is to ensure that communities can influence the plans for our area (in accordance with government expectations that "*decisions about what to build and where should be shaped by local communities and reflect the views of local residents*"), and, of course, to leave a positive legacy for future generations.

I look forward to your response.

Thanks

Marj

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[1] https://www.bailii.org/ew/cases/EWHC/Admin/2026/261.pdf (paragraph 65)

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Kind regards
Marj Powner
Chair, Friends of Carrington Moss (https://friendsofcarringtonmoss.com/)
Vice Chair, Save Greater Manchester Green Belts Group (https://www.savegmgreenbelt.org.uk/)
Vice Chair, Community Planning Alliance (https://www.communityplanningalliance.org/)

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