

Feedback to Trafford's Scrutiny Committee

Following the Carrington Relief Road Presentation
12th January 2022

Friends of Carrington Moss
8th March 2022

Core Strategy 2012

The rest of the story!



All prospective developments should be aligned with the 2012 Core Strategy (and any remaining policies from the 2006 UDP until an updated Local Plan is approved)

Carrington Relief Road



Journey to the Current Position Core Strategy

- 2012 Trafford Core Strategy proposed a number of transport improvements around Carrington – including the provision of a new link road to provide better capacity, alleviate congestion and improve public transport and cycling
- 2012 Trafford Core Strategy recognised that the opening up of the former Shell petrochemical site and related areas for development was dependent on improving access for all road users
- A principal component of this is the Carrington Relief Road that is intended to take traffic away from the narrow A6144 Carrington Lane and Manchester Road – thus alleviating existing congestion, improving overall capacity and providing a safe and more effective route for cycling and public transport



[Click here to go to our core strategy blog for more information](#)

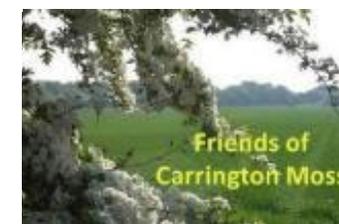
Consistent Support for Carrington Moss:

- Protecting and enhancing the mosslands and the sites of biological importance, including the Carrington Rides
- Safeguarding the best and most versatile (Grade 2) agricultural land from forms of development that would irreversibly destroy its longer-term potential

Transport Improvements include:

- At £3m, a much less intrusive Carrington Link Road
- Improvements to frequency and reliability and support for the further development of a high quality integrated public transport network
- A bridge across the Manchester Ship Canal at Carrington
- A commitment to better utilisation of rail, ports and shipping services for Freight Transport to build a sustainable distribution system.

New Carrington and Places for Everyone



P4E, which has not yet been approved, will release of 169 hectares of green belt land (equivalent to 236 football pitches)

The New Carrington Plan for 5,000 homes, 350,000 m2 employment and 4 major roads, is sited in an unsustainable location, constructing across peat moss, grade 2 best and most versatile agricultural land, wetland and woodland habitats, the breeding and feeding grounds of over 20 red listed birds and a number of endangered wildlife species

Carrington Relief Road



Journey to the Current Position Places for Everyone

- The Carrington, Partington and Sale West area has been identified as a significant development location in the Places for Everyone (P4E) 2021 Plan. This builds on the need for the Relief Road from the Core Strategy
- The area is proposed for approximately 4,300 homes in the plan period to 2037 and 5,000 homes overall, as well as approximately 350,000 sqm employment floorspace
- The Strategic Location covered land which is within the existing urban area, including a significant area of brownfield land from previous industrial uses and petrochemical works
- The proposed P4E allocation includes this area, but also identifies significant land beyond this much of which is currently in the Green Belt and which P4E proposes to release



Scrutiny Committee 12 January 2022 – Carrington Relief Road

3

[Click here to go to our P4E blog for more information](#)

New Carrington Development

- The proposals for one Ward (Bucklow St Martins) equates to **over 20%** of Trafford's planned housing development for the next 16 years!
- Trafford acknowledges there is a major problem with HGV traffic in the area, yet, **OVER THE PAST 10 YEARS, NO SUSTAINABLE** options for passenger and freight transport have been explored
- Only the Carrington Relief Road is being progressed, a response to our FOI confirms there are "**NO committed schemes to improve public transport in this area**"!

Places for Everyone

- GM has sufficient land supply to meet Government and population growth needs without releasing any green belt – so the decision to release **2,430** hectares of green belt (the equivalent of **3,403** football pitches) across the Region is unnecessary
- The available land supply across the GM Region (without the release of green belt) equates to **170,000** homes (which could meet the needs of over **400,000** people) against natural population growth of less than 200,000 people!
- GM's leaders could have chosen the more sustainable Public Transport Max Spatial Option rather than the accelerated growth option, given the climate emergency

GM's Transport Strategy 2040



Trafford says *“The road is not the only show in town”*

Yet, the Carrington Relief Road is the **ONLY** commitment in the GM Transport Strategy Delivery Plan

Carrington Relief Road



Transport Strategy

- The Greater Manchester Transport Strategy 2040 Delivery Plan 2021-2026 identifies the Carrington Relief Road as a project which can be delivered in the next five years
- Much of the traffic, particularly HGVs, will use the new route thereby allowing for traffic calming measures and improved walking, cycling and public transport access on the existing A6144 route
- The PfE New Carrington allocation policy requires new and improved cycling and walking access to be delivered as part of the development and both the CRR and A6144 will form integral parts of the network and also link to the wider Bee Network and MCF schemes
- The CRR will also deliver improved bus access to the Carrington area as part of wider improvements planned for the PfE allocation, this could include improved bus stops, priority bus junctions and greater service frequencies and routes

Scrutiny Committee 12 January 2022 – Carrington Relief Road

[Click here to go to our GM Transport Strategy blog for more information](#)

GM Transport Strategy 2040 at a high level:

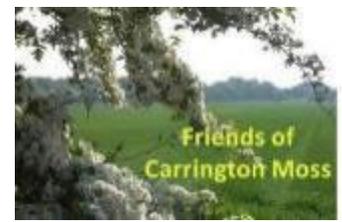
- Vision: *World class connections that support long-term sustainable economic growth and access to opportunity for all*
- Aim is for **50%** of trips to be made by sustainable modes, with **NO** net increase in motor vehicle traffic, by 2040
- Achieving the Right Mix is expected to lead to **zero** net growth in motor vehicle traffic in Greater Manchester **between 2017 and 2040**.

Considerations:

- Trafford's Officer said *“there are lots of other interventions that are just as important and are also being pursued”* – did he mean for cycling and walking?
- What alternatives are there for all that freight traffic?
- The GM Transport Delivery Plan contains **NO** sustainable passenger or freight transport options for New Carrington
- Local communities have identified alternative sustainable transport options but there is no forum for us to discuss them with Trafford and there has been no appetite from Trafford Officers to explore alternatives to the Carrington Relief Road.

CRR Strategic Case

What about those Traffic Numbers?



Is Trafford making decisions based on data that is out of date, incomplete and inaccurate?
If not, where is that data?

Carrington Relief Road – Strategic Case



Expected Benefits – In Summary

- Significant numbers of new homes
- Significant provision of new employment land
- Congestion relief will allow and promote travel options such as cycling and also lead to further opportunities for public transport such as buses
- Opportunities to address environmental concerns due to the creation of a new road

[Click here to go to our Traffic Numbers blog for more information](#)

Traffic levels:

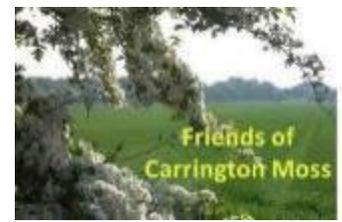
- Currently over 200 HGVs an hour in rush hour, over 130 an hour at other times, with HGV traffic impacting residents' lives and their health 24x7
- Trafford has already granted planning approval for a substantial number of applications that will bring even more traffic onto roads in this area
- Remember - achieving the Right Mix is expected to lead to **zero** net growth in motor vehicle traffic in Greater Manchester **between 2017 and 2040**.

Considerations:

- Trafford cannot provide the traffic numbers we have repeatedly requested
- The disputed element of the CRR route only replaces a small portion of the existing A6144
- The GM Transport Delivery Plan contains **NO** sustainable passenger and freight transport options for New Carrington
- [New roads bring new traffic](#) – long-established effect known as induced traffic
- Given the expected zero growth in vehicle traffic, why is a new road a priority for public funding at this time – what is the Business Case?

Environmental Issues

Reduced to ONE line in the presentation!



And **NO** discussion about the Natural England response!

Carrington Relief Road – Strategic Case



Expected Benefits – In Summary

- Significant numbers of new homes
- Significant provision of new employment land
- Congestion relief will allow and promote travel options such as cycling and also lead to further opportunities for public transport such as buses
- Opportunities to address environmental concerns due to the creation of a new road

Scrutiny Committee 12 January 2022 – Carrington Relief Road

[Click here to go to the Natural England FOI response](#)

[Click here to go to the FOCM Alternative Transformation Strategy for Carrington Moss](#)

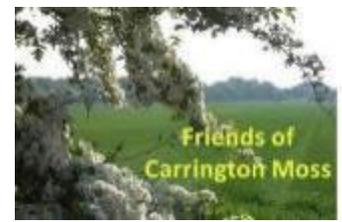
Key Points:

- The suggestion that the significant environmental issues (highlighted by NE) can be “addressed through careful design” is fanciful
- There has been **NO** Assessment of the Natural Capital Value of the options
- Trafford declared a Climate Emergency in November 2018 – where is the evidence that this project has been reviewed following that declaration?
- Option F will fracture the wildlife corridor, impacting the populations of many red listed birds and endangered wildlife species that breed and feed on the Moss
- Option F will also impact the health and wellbeing of large numbers of local residents who use the existing routes across Carrington Moss for walking, cycling and horse-riding (note that there are over 1,000 horses stabled in this area)

Considerations:

- It seems any public consultation will now only be undertaken on Option F – this should be reconsidered!
- We remain very concerned about the level of flood risk that Option F will cause.

Has Trafford heard about the Green Claims Code?



Business and Services Organisations MUST abide by it

Including developers, construction companies and the ecologists they use!

Does Trafford's CRR Preferred Options Report Comply?

Looking at Natural England comments alone, it clearly does not comply!



Extract from Natural England feedback on CRR Options Appraisal

3. Route Options

We note that the full Environmental Scoping Report is not yet available but the Options Appraisal Report states that a desktop assessment has been carried out. We are disappointed that the findings of the environmental desktop study **are not fully reflected** in the appraisal of the route options. Appendix D contains slightly more information on the environmental constraints but is **not an accurate representation**.

5.3 Option F Risks

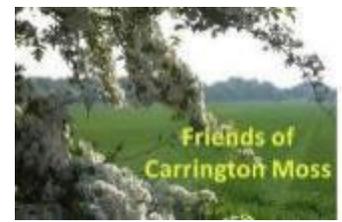
The environmental risks have **not been included** in this section although they were included in Chapter 5.2 (Option A Risks). We think this presents **an inaccurate and unbalanced view** of the environmental constraints and it is Natural England's view that **Option F would be considerably more damaging than Option A**.

The Green Claims Code Principles are:

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

Public Engagement

Our struggle to secure robust, genuine consultation



Trafford is not following its own Statement of Community Involvement (SCI) or the Gunning Principles!

Public Engagement

- Early public engagement was carried out before any formal statutory public consultation
- Engagement exercise comprised a range of tools including:
 - The creation of a dedicated Council web page which included a video presentation of the Preliminary Options Appraisal Report
 - The distribution of 10,000 leaflets to local residents and businesses
 - The facility for respondents to easily feed back comments directly via the web page
 - The issue of a direct email invitation to over 400 contacts on the Audience Insight contact list, which included councillors, local businesses, media contacts, stakeholders, community groups and residents

Scrutiny Committee 12 January 2022 – Carrington Relief Road

SCI Intentions:

- Planning system should be as transparent, accountable and socially inclusive as possible.
- There should be as many opportunities for successful and meaningful public participation as there can be.
- Trafford Council wants to have even more effective community involvement, providing opportunities for active participation and discussions with the community as early in the plan-making and planning application processes as possible

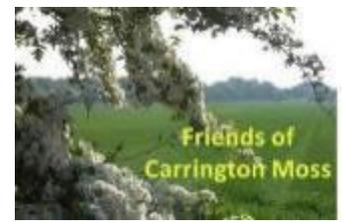
The reality:

- Public engagement exercise was limited to raising questions about the CRR and the Option Appraisal process - **NOT** proposing preferences about the route option
- Most of the questions raised in the public engagement exercise were **NOT** covered in the subsequent report to Committee and have not been responded to
- Our requests for workshops have been repeatedly ignored

[Click here to go to our Public Engagement blog for more information](#)

Public Engagement

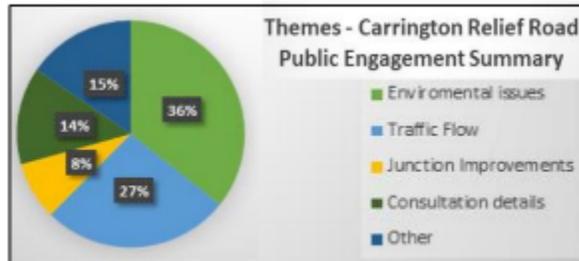
There has NOT been an open and fair engagement process



Trafford's approach has been misleading to the extreme!
There has been **NO** consultation to date about the CRR!

Public Engagement

- The early public engagement exercise aimed to assist in the selection of a preferred route option, calibrate scheme objectives, and to inform the subsequent development of the design
- The analysis found that of the 123 responses received, just 21 respondents expressed a preference between Option A (on-line widening) and Option F (new build). Eleven indicated Option A as their preference and 10 indicated Option F as their preference, and a further responder wished to see both options progressed.



Scrutiny Committee 12 January 2022 – Carrington Relief Road

Public Engagement Feedback:

- Our feedback “Residents believe improvements can be made to the design of Option A. How can these be fed into the process?”
- **NO** response received, yet there could be opportunities to ameliorate Option A (a solution which could result in lower costs for the public purse, be less environmentally damaging and more acceptable to local residents).
- Trafford say: “a preferred option has not been identified from the engagement responses” – an astonishing statement given the terms of the exercise!

Considerations:

- Only 123 responses to the public engagement exercise
- Resident feedback has **NOT** enriched the process (an objective was removed that residents want, an objective proposed by residents was not included)
- Natural England's response **NOT** highlighted in the report
- There has been a consistent lack of support for the New Carrington development and CRR proposals from residents
- Our petition gathered much support and 1,632 signatures from impacted residents and users of Carrington Moss

[Click here to go to our Public Engagement blog for more information](#)

History of the New Carrington Proposals



A consistent lack of support for the New Carrington development & CRR proposals

<p>2012 Core Strategy Trafford report 87 responses in total but then give the following figures, no responses relate to the CRR</p>	<p>August 2014 All Local Planning Authorities in GM agreed to prepare GMSF</p>	<p>2015 GMSF Growth and Spatial Options Paper</p>	<p>First Consultation 2016 GMSF Responses</p> <ul style="list-style-type: none">• Very limited consultation – no local publicity about the impact, no involvement of Parish Councils• New Carrington Allocation:<ul style="list-style-type: none">• Only 33 responses (22 individuals)• Over 66% disagreed with proposals• Of the 33% agreeing, many only agreed with development on brownfield areas	 <p>FOCM Founded January 2017 following landowner signage on CM footpaths</p>
<p>November 2009 2012 Core Strategy Consultation</p> <p>24 Responses in Total Very few from residents!</p>	<p>March 2010 2012 Core Strategy Consultation</p> <p>44 Responses in Total Very few from residents</p>	<p>Scoping Survey receives a total of 94 responses</p>		
<p>Second Consultation 2019 GMSF Responses</p> <ul style="list-style-type: none">• Consultation and publicity still inadequate• New Carrington Allocation:<ul style="list-style-type: none">• 867 responses• Over 83% disagreed/mostly disagreed• Only 7.5% agreed or mostly agreed with the proposals <p>Many disingenuous statements, eg, the New Carrington location “enables the redevelopment of the extensive former Shell Carrington industrial estate” (note that the brownfield land has already had planning approval without the GMSF being complete). There was no focus on the planned release of 240 hectares of green belt land for development on irreplaceable habitats!</p>	<p>3rd Iteration 2020/2021 (Regulation 19 Consultation)</p> <p>Stockport politicians voted to withdraw in 2020, plan renamed Places for Everyone (P4E)</p> <p>The 2021 consultation responses are currently under review by the GMCA, prior to being sent to the SoS</p> <ul style="list-style-type: none">• For the New Carrington Allocation - there was still no involvement of Parish Councils or other community representatives prior to the documentation being released in October 2020 <p>Again, many disingenuous statements</p> <p>The 2020 document stated that “Due to the existing condition and nature of habitats, hydrology and land available, large scale restoration of raised bog will not be possible” - this is not the case!</p> <p>The document also suggested that public transport will be significantly improved – responses to our FOI requests suggest this will not be the case!</p>	 <p>FOCM Survey 2021 Of 831 responses: 4.7% support the New Carrington Masterplan 94.2% support FOCM alternatives</p>	 <p>FOCM Petition 2021 1,632 responses: Residents do not support the construction of roads across Carrington Moss</p>	
			 <p>CRR Public Engagement 123 responses</p>	

Route Options and Method

Incomplete, Inaccurate and Biased!



Our analysis found **17 points of bias, 14 contradictions, 10 inaccuracies, 19 misleading statements and 23 other issues** spread across the Essential and Other Criteria

Route Options & Methodology



- A Preferred Option Appraisal Report was undertaken which identified two options: A and F
- Based on a range of criteria and based on current industry best-practice – each option was assessed against an appraisal methodology utilising specialist advice and consultants
- Appraisal methodology was wide ranging and included the following elements:
 - Transportation – included journey times, layout of junctions, road safety
 - Drainage and Flood Risk Assessments
 - Landscape considerations
 - Impact of construction phase
 - Geotechnical assessments
 - Carbon Reduction
 - Heritage considerations



Scrutiny Committee 12 January 2022 – Carrington Relief Road

10

[Click here to go to our Option Appraisal blog for more information](#)

Key Points:

- The GM Spatial Framework is **NOT YET APPROVED!**
- Option F was Trafford's predetermined preferred option (as highlighted in previous CRR reports, and in the Places for Everyone documentation) – this is inconsistent with the Gunning Principles
- There was insufficient consultation and no conscientious consideration of resident feedback
- Many of the Option F costs are excluded from the estimate within the Option Appraisal, and a revised Option A (in line with resident suggestions) would significantly reduce the costs of the route

Considerations:

- There is no dispute over the opening of the A1 route in Carrington
- Previous Development Plans considered a £3m road (much less intrusive)
- Natural England consider Option F the most environmentally damaging
- Option A can be upgraded for vehicle traffic, with Option F (the shorter route) being ideal for active travel users – there is no need to widen the existing A6144

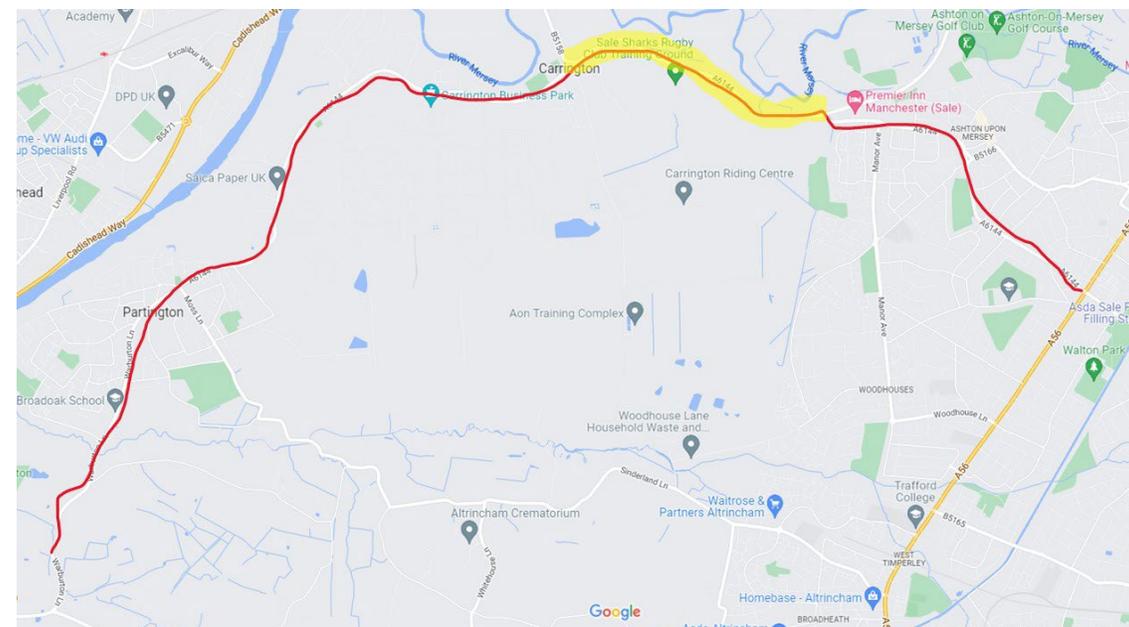
What's wrong with this statement?

From Trafford's Option Appraisal for the Carrington Relief Road



Option F would result in the A6144 becoming a more friendly route for active travel users **“over its full length, on a quieter, reduced speed road”**.

- Firstly, the A6144 runs from Sale to Warburton (highlighted in red on the map) - Option F replaces the very short Eastern stretch (highlighted in yellow on the map)
- Secondly, only 64% of vehicle traffic is expected to use the new route and, according to TfGM, the additional capacity of the Option F route is likely to induce additional through traffic into the area
- Thirdly, the A6144 is expected to have a design speed of 40mph!



Mmmh!

So not the full length of the road, not a quieter road, and not a reduced speed!

Would you call that a misleading statement?

Carbon Neutral Objectives/Improvements



Still Awaiting Detailed Figures from Trafford

We are not convinced that key elements of the PAS2080 methodology have been followed

Carbon neutral objectives/Improvements



- Carbon impacts of each option were assessed by Amey Consulting employing an appraisal methodology based on PAS 2080: Carbon Management in Infrastructure
- A budget was created for each scheme based on the estimated carbon emissions for materials, transport, construction and waste. The values are:
 - Option A (online): 2410.365tCO₂e
 - Option F (offline): 2358.322tCO₂e
- Loss of sequestration through de-vegetation was calculated thus:
 - Option A (online): 629.962tCO₂e
 - Option F (offline): 370.137tCO₂e
- Option F thus performed better overall in terms of carbon assessment, but further appraisal will be required as the design progresses.
- Route F lies generally to the north of the historic Carrington Moss – but the detailed invasive ground investigation work encountered Peat at one isolated location - approximately 50mm thick at a depth of around 1.2m. In the light of this further investigation will take place.

Scrutiny Committee 12 January 2022 – Carrington Relief Road

12

Key Points:

- Trafford confirms Option F requires 30% more construction journeys, yet the carbon emissions for Option A (an existing road) are higher than those for Option F (a new major road, which Trafford suggests will need to be a dual carriageway)
- Option A does not require the level of vegetation removal suggested by Trafford
- Natural England confirms that Option F will be far more damaging than Option A
- The loss of sequestration capabilities for Option F have not been fully captured

Considerations:

- Trafford states they have only found a “thin layer of peat in an isolated trial hole”
- Government has a Strategy to restore England’s peat mosses
- Any drainage in the vicinity of the huge area of remaining peat on Carrington Moss (325ha in 1995, 3m in depth), could impact its ability to be restored, resulting not only in a loss of future sequestration opportunities, but also the loss of a recognised irreplaceable habitat
- Our discussions with experts lead us to believe Carrington Moss is more than capable of restoration
- Carrington Moss should be designated as an area of high conservation priority

[Click here for Trafford’s Carbon Neutral Framework](#)

[Click here for Trafford’s Carbon Neutral Action Plan](#)

Other Sustainability Considerations

There are NO sustainable passenger or freight transport options in the plan!



The plans for growth stretch over 16 years, **following approval**. There is time for Trafford to develop **sustainable passenger and freight solutions** – providing genuine encouragement for modal shift!

Other Sustainability Considerations



- Relief road will achieve a significant enhancement to the local area by creating an environment to encourage modal shift to various means of active travel and reduce dependence on motor vehicles
- Will provide significant relief to the A6144 through Carrington Village, where there are long-standing concerns from local residents about large polluting vehicles/HGV's, traffic speed and congestion which restrict opportunity for safe active travel.
- Suite of potential improvements has been identified to facilities for walking, cycling, public transport and for calming traffic generally. These measures represent a value of approximately £1m



Scrutiny Committee 12 January 2022 – Carrington Relief Road

13

Key Points:

- Trafford's documents only “encourage” the use of sustainable materials and resources
- Construction on Carrington Moss cannot be considered a sustainable solution

Considerations:

- Walking, cycling and horse riding next to high numbers of speeding vehicles will not be a pleasant, safe or healthy experience and will not encourage modal shift
- Option F would fracture existing routes across Carrington Moss, not only making it difficult for active travel users but also making it dangerous for both humans and wildlife – not an encouragement for modal shift
- Option A would allow active travel users to use existing (upgraded) PROWs across Carrington Moss, including Carrington 1 (which runs in parallel to the A6144)
- Trafford has NOT committed to closing the existing A6144 to HGVs and through traffic
- Carrington Village will be surrounded by two major roads bringing yet more air, noise and light pollution and no relief from overnight vibrations

[Click here to go to our blog about Understanding Sustainability](#)

Sustainable Development

What does it really mean?



Just a reminder about the words from the NPPF:

“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”.

So perhaps what we should be asking ourselves is – are there other places in Trafford where we can:

- restore peat to more effectively capture carbon, so our children and grandchildren can breathe cleaner air?
- grow crops and alleviate surface water risks, so our descendants have fresh food, with a low carbon footprint, and residents are not fearful of flooding every time it rains?
- increase the populations of red listed birds and endangered wildlife, so we can help nature’s recovery, increase biodiversity and mitigate the impact of climate change?

If the answer is “No” to one or more of these questions, we should not be building on Carrington Moss!

Next Steps

The next iteration of the Programme Plan should now be available



What alternative options has Trafford prepared for the eventuality that the New Carrington Allocation or the Carrington Relief Road are not approved by the Planning Inspectors?

Carrington Relief Road



Strategic Programme/Next Steps

- Proceed to develop preferred option route and undertake design of Rationalisation Phase 2
- Preparation of Revised Project Programme
- Undertaking further traffic modelling work to enable junction layout design
- Carrying out formal public consultation
- Preparing an Environmental Impact Statement
- The submission of Planning Application
- Preparation of a full funding strategy including final business cases for grants
- Following this work further formal decision of the Executive will be required before any final decision is made to proceed

[Click here for Government guidance the Transport Appraisal Process, including Consultation](#)

Key Points:

- Trafford stated, at the Scrutiny presentation, that they will be working in partnership with the landowner – why no partnership with Parish Councils and Community Groups such as ours?
- Why not set up some forums to enable residents to input to the process?
- Will the next round of public consultation be robust and genuine

Considerations:

- Will the programme be managed to PRINCE2 principles (as suggested in the Outline Business Case)?
- When will the revised traffic modelling and other information to support the more detailed programme plan be available?
- Who will do the environmental impact statement? Will Natural England be involved?
- Will the final business cases include an assessment of Natural Capital Value