

28th February 2020

To

Ms Sara Todd (Chief Executive, Trafford Council)

cc.

Councillor Andrew Western

Sir Graham Brady (MP)

Kate Green (MP)

Dear Sara

Carrington Relief Road Outline Business Case Executive Summary

The Friends of Carrington Moss wish to share our concerns about the recently published document which sets out the plans for roads to be constructed on and across Carrington Moss.

I have corresponded with Adrian Fisher and have talked to Mark Riordan (Amey Project Manager for the Carrington Relief Road), both of whom have been very helpful. We are delighted that Trafford intends to engage fully with local communities to consult on the road network in the area. We are fully aware that there are a variety of views about the potential new roads. With this in mind, we think it is extremely important that all residents are fully informed about the Council's strategic intentions in terms of the traffic that will traverse these new routes, the plan/timetable for designing and developing the new road network and the current risk/issue log. We would welcome your feedback on these as soon as possible as it appears the timetable for the development of the road(s) is exceptionally rapid.

Whilst we appreciate that the OBC document was created and published to satisfy the requirements of the funding conditions, it does outline some principles which we would like to clarify. We have set out our concerns in the accompanying pages and would also welcome any comments you have about these.

You may already be aware that the Friends of Carrington Moss recently arranged two workshops to feed into the Master Plan process for this area, the first looking at the Ecology and Biodiversity on Carrington Moss, the second focusing on Interconnected Traffic-Free Routes across Carrington Moss. A number of quick wins and actions were identified at those workshops, these are being taken forward with support from our partners. The community has other insights and ideas that will be important to bring to the table, including alternatives to the route of/plans for the Carrington Relief Road. For information, we are already planning a third workshop which will cover the risks associated with the Master Plan for the area, including flooding, air pollution and issues related to the COMAH zones.

We are looking forward to working with you and your teams to find solutions that will bring real benefits to Trafford residents without impacting the health and well-being of existing and new communities or the habitats of red listed birds and endangered wildlife.

Kind regards

Marj Powner
(Chair)



Carrington Relief Road Outline Business Case

Trafford's Strategic Intent for routes through Carrington, Partington and Sale West

Trafford's strategic intent appears to be to encourage increasing volumes of additional traffic to drive through existing and new residential areas by creating a network of roads that will provide more benefits to people from outside the Borough than to those living in Trafford. Indications of this deliberate, and very damaging, policy include:

- The document states that the *“primary goal [of the CRR] is to enable growth to take place”*, there is no reference to the considerable effect of these roads on the health and well-being your existing residents, athletes using the local sports facilities (football, rugby and the Transpennine Trail) nor about the impact of increasing numbers of HGVs, with vibrations causing concerns about the structural integrity of local housing and other buildings
- The area is described as being in a *“strategic location between the M60 and M62”* with *“associated accessibility to the strategic road network and Manchester Airport”* suggesting that our neighbourhood is a conduit, enabling the flow of significant traffic levels across an extended urban area, for which there is already a motorway network
- There appears to be an expectation that the road (and the Carrington Spur) will ultimately become a dual carriageway to enable large volumes of traffic to drive through a Medieval village and housing estates, passing those local sports facilities and bringing air and noise pollution to all residents and users in the area.
- We also understand, from our discussions with your team, that it is anticipated that 50% of the traffic will use the Carrington Relief Road and 50% will continue to use the existing Manchester Road, the effect of this will be to fully encircle Carrington Village within a network of major roads, increasing air pollution for local residents and turning the village into a glorified traffic island, with a similar impact to Sale West
- The document also indicates that there is an intention to bring in further traffic via improved *“transportation links to the Strategic Road Network, Metrolink and **cross conurbation to Salford (a Manchester Ship Canal crossing will be subject to further investigation)**”*, once again suggesting that significant numbers of additional vehicles will be encouraged to pass through our neighbourhood.

All of which will hugely disadvantage existing local residents, significantly increasing air and noise pollution and associated health conditions. The recent report about growing health inequalities (<https://www.bbc.co.uk/news/health-51619608>) cannot be ignored here. We can compare what is planned for the people of Carrington, Partington and Sale West with the approach taken by our neighbours in Cheshire, where those more affluent residents have had the road network just South of Trafford diverted away from their properties.

It should also be noted that these plans will destroy a (free) green space which is heavily used by many disadvantaged residents in those Wards with the lowest proportion of green space in the whole of Trafford. There is no reference in the document to horse riding, despite there being over 1,000 horses stabled near to Carrington Moss, many of which access the bridleways frequently. Nor is there any reference to the ecology and biodiversity, the Sites of Biological Importance (SBIs) and the breeding and feeding habitats for over 20 red listed birds and a number of endangered wildlife species.

Engagement with Residents

We are delighted that there is a plan to genuinely consult with local residents and that a workshop will be held with community representatives towards the end of March/early April.

We understand, however, that work has already taken place on this project and we are keen to be put on a level playing field with other key stakeholders.

Carrington Relief Road Outline Business Case

We note that the project is working to PRINCE2 principles, that a Programme Board has been established and that a number of formal reviews have already taken place. Please can you provide the details of the membership of the Programme Board? We are particularly keen to understand who (and we recognise there may be more than one person) has the role of Senior User. Please can you also confirm the dates of future Programme Board meetings as we would like to ensure that the Senior User representing local residents is fully briefed in advance.

We would also like to understand the detailed timetable for this programme of work, the intended communication strategy to keep your residents informed and the approach for ensuring all risks and issues are captured and mitigated.

Financials, Value for Money, Economics

We would like to see the detailed calculations about the costs set out in the document as we believe there are a number of significant gaps which should be taken into consideration when developing the business case. We'd also like to take a good look at the calculations that have resulted in the NPV and BCR values.

The document states that the project "*produces significant benefits, about £132m over the 60-year appraisal period*". That is around £2.2m per year, so not so significant when you consider the potential benefits of other options! You will be aware that the GMSF Natural Environment Topic Paper set out the benefits of the Natural Capital Account (NCA) which has been developed for Greater Manchester. The NCA suggests, for example, that air quality improvements alone would result in a £41m benefit per year (across GM) in reduced health care costs. An estimate of Trafford's proportion of this benefit, based on population, would amount to over **£3.4m** per annum of real savings to the public purse.

In comparison, the OBC document suggests that by far the greater proportion of the benefits will be generated by travel time savings. We would be interested to understand the approach for measuring achievement, particularly in terms of real cost savings and the actual beneficiaries. We feel strongly that such savings are unlikely to be realised given the plan to encourage significant levels of additional traffic to travel through the area, rather than using the motorway network and other existing major roads, leading to increased congestion, not speedier travel time. Neither will Trafford residents be the key beneficiary of any such reduced travel time "savings", given that many users of these new roads will be from outside the Borough.

The other, much smaller, proportion of the benefits is in vehicle operating costs, so again, Trafford residents are unlikely to benefit from these savings.

Critical Success Factors

Clearly more work needs to be done on this section of the document to include some of the issues we are raising, such as reducing air and noise pollution for existing residents (and ensuring it does not increase in any part of the area), ensuring local ecology and biodiversity is protected (especially the SBIs, the trees and the wetland habitats) and guaranteeing future flood risks are fully mitigated.

Alternative Options

The document mentions that a number of options have been considered but does not provide any detail. We would be keen to understand which options have been explored previously and why they were considered inappropriate. To date, there has been no consultation with residents about any options.



Carrington Relief Road Outline Business Case

Flood Plain

You will be aware that many parts of Carrington Moss are subject to regular surface water flooding. In fact, we have had very high levels of flooding continuously since October 2019, now extending into Dainewell Woods, leading us to recognise a new feature on the Moss, "Carrington Lake".

At a time when severe flooding has devastated communities across the UK, much greater consideration should be given before building (roads or housing) on our flood plain. On 25th February the Environment Agency CEO, Sir James Bevan, reinforced concerns, that have been raised previously by the Agency, suggesting that building on flood plains "should be resisted if at all possible" <https://www.bbc.co.uk/news/uk-51620992>.

Interestingly, he provides examples of techniques which could be used to "flood-proof" homes, include planting trees and creating wetland habitats, the very features that are currently preventing flooding and that will be destroyed by Trafford's current plans. It would be helpful to understand Trafford's policy on the protection of the trees as the current indication is that a significant number would be felled to make way for the new roads.

It is of great concern to existing local residents that, if building (roads or housing) takes place in this location, there will be a severe and regular impact from flooding once the flood plain and our protective habitats are eliminated. A Local Authority decision which resulted in such a major consequence for existing residents would bring considerable health risks and significant costs.

Air Pollution

Unsurprisingly, the emphasis throughout the document is on road network improvements, rather than seeking ways to reduce the reliance on the car. This is inconsistent with the Greater Manchester Transport Strategy 2040, which aims to reduce car journeys by 50%.

The Government's Public Health briefing to promote active travel (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf suggests that "*it has been estimated that half of the UK's £10bn cost per annum of air pollution comes from road transport*" and that "*Disadvantaged areas also tend to have a higher density of main roads, leading to poorer air quality, higher noise levels and higher collision rates*". Health inequalities are further exacerbated because "*residents of deprived communities tend to travel less than the better off, but feel the impact of other people's travel. In short, increasing car dependency has led to increasing unfairness*". The strategy to build these new roads on and across Carrington Moss is a clear example of this.

More needs to be done to seek other ways of improving the current traffic congestion using solutions that will not result in greater levels of air and noise pollution in the area and the resulting impact on the health and well-being of residents.

The document appears to suggest that, despite acknowledging that we are in an area very poorly served by public transport, improvements to public transport are a long term intent, rather than a short term opportunity which would reduce the need for new roads and significantly improve air quality. There is no reference to the potential for other options, such as community transport, to play a transitional role in creating the demand for bus services.

The community has a number of ideas aimed at reducing reliance on the car and improving access to the isolated communities in Carrington, Partington and Sale West.



Carrington Relief Road Outline Business Case

Factual Errors and Misleading Statements

The OBC document states that *“the Carrington location is predominantly a brownfield development site”*. When the intention is to release 240 hectares of green belt in the area where your residents have the least amount of green space in the whole of Trafford, this is disingenuous. A similarly misleading statement in the report is that the scheme is designed to address *“a legacy of industrial and waste land”*. The roads will be constructed on Grade 2 agricultural land, across SBIs and will decimate a much used, free to access, green corridor, currently populated by carbon-capturing woodlands, peatmoss and wetland habitats. Local residents certainly do not consider it to be “waste land”.

Regarding the sentence *“Sale West (SR2A, 2B & 2C) - HIMOR have instructed a Consultant team to prepare a detailed masterplan of this site. A planning application for the Sale West development could be submitted to dovetail with the emerging GMSF”*. This is factually incorrect. HIMOR has confirmed that their consulting team have no instructions to produce any Master Plans for these sites and that they have *“no current plans to submit an application before either GMSF or a local plan has progressed”*.

There are several references in the document which relate to the fantastic number of new job opportunities the development will deliver. For example, *“The site can deliver approximately 400,000 sqm of employment land creating up to 7,800 jobs when fully built out”* and *“Once completed, it is anticipated that over 14,000 new jobs could be provided with significant GVA contributions per annum”*. A huge difference in the figures in different parts of the document (and section 6.1 outlines completely different figures to both of these). It would be useful to understand which is considered to be the most accurate estimate.

The document states that not providing the infrastructure could impact the achievement of TfGM’s 2040 vision. As you will know, the Transport Strategy 2040 vision is to *“improve our transport system to support a reduction in car use to no more than 50% of daily trips, with the remaining 50% made by public transport, walking and cycling”*. So, it is totally incorrect and disingenuous to say that not building roads will affect the achievement of a vision to significantly decrease car travel and increase the use of public transport and active travel options.

These are just a few examples. All in all, as a consequence, the document lacks credibility. We would hope such errors and misleading statements will not continue to be a feature of future documents published by Trafford.

And finally,

Freedom of Information Act Request

We feel strongly that residents should have sufficient information to enable them to contribute as fully as other key stakeholders, who have clearly been involved in various discussions to date. With this in mind, a Freedom of Information Act request has been submitted in relation to the Carrington Relief Road and, depending on the information supplied, may need to be repeated for the other parts of the scheme (the Sale West Link Road and the Southern Link Road). We look forward to an early response, especially given the rapid timetable for this programme of work.