

# Carrington Relief Road Process

## Complaint to Trafford

I would like to raise a formal complaint about the process that has been followed in relation to progressing the Carrington Relief Road (CRR).

My complaint is summarised by the following examples of issues to be addressed:

- There is a lack of clarity about the costs of the route options to the public purse. The Executive Report suggests the costs will be £29.4m, a previous report has suggested £34m, and the Option Appraisal suggests the preferred route will cost £36m. In addition, the Option Appraisal document confirms that many of the preferred route costs are **excluded** from that figure, including the cost of dualling, and there are a number of other costs about which I am unclear whether they are included or excluded from the £36m figure
- Residents believe improvements can be made to the design of Option A and asked (in the public engagement exercise) how our ideas could be fed into the process. We received no response and a decision has been made without hearing those ideas, which means potential opportunities to create a solution which would result in lower costs for the public purse, be less environmentally damaging and more acceptable to local residents has not even been considered.
- The decision to select a route across Carrington Moss, Grade 2 best and most versatile agricultural land, woodland and wetland habitats is contrary to the Government's Planning Guidance in relation to the Natural Environment, which states that the first step is **Avoidance**, with the advice stating "*Can significant harm to wildlife species and habitats be avoided; for example by locating on an alternative site with less harmful impacts?*" Trafford does have alternative options that could avoid these harmful effects.
- The decision to select a route across Carrington Moss is contrary to the National Planning Policy Framework on achieving sustainable development. Sustainability is defined, within the NPPF, as "*as meeting the needs of the present without compromising the ability of future generations to meet their own needs*".
- The decision to select a route across Carrington Moss is contrary to Trafford's declaration of a climate emergency (made in November 2018). There is no evidence that the decision to construct a road has been reviewed in the light of that declaration, and that alternative (sustainable passenger and freight transport) options have been considered since that date
- There is insufficient information about the calculation of the expected carbon emissions resulting from the road options. This information is awaited via an FOI request but I currently do not believe the carbon emissions data within the Option Appraisal document is credible
- Trafford states that "*Delivery of the scheme will support the growth ambitions articulated within the emerging Places for Everyone Plan*", yet that Spatial Plan does not yet have approval. It is premature to assume approval will be given by the Planning Inspectorate. In addition, **if** the Spatial Plan is approved, it is a 16-year plan, from the date of approval, giving time to develop sustainable passenger and freight transport options, alongside upgrading the existing route and upgrading the PROWs across Carrington Moss
- Despite that planned growth in the area, and Trafford's acknowledged recognition of the issue with HGV traffic, there have been no proposals for any sustainable passenger or freight transport options throughout the period that the Spatial Strategy has been under development (our FOI request reveals there are no plans for improved bus services, trains, or trams)

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- The lack of consideration for sustainable passenger and freight transport options is contrary to GM's Transport Strategy, which states that achieving the Right Mix is expected to lead to **zero net growth in motor vehicle traffic in Greater Manchester between 2017 and 2040**
- A predetermined solution was identified prior to any public consultation (contrary to the Gunning Principles)
- No conscientious consideration has been given to resident feedback in relation to the CRR (contrary to the Gunning Principles)
- No consultation has been held with residents, yet a preferred option has been selected (contrary to the Gunning Principles)
- The CRR route selection decision has not followed the guidance within Trafford's Statement of Community Involvement
- The public engagement has not followed the approach set out in Trafford's CRR Options Consultation Report (dated 18th December 2020)
- Feedback from residents and Natural England has not been considered in coming to a preferred route decision. Our requests for workshops have also been repeatedly ignored
- There has been NO Assessment of the Natural Capital Value of the options
- The CRR route selection decision has been based on a flawed Option Appraisal, within which we found **17 points of bias, 14 contradictions, 10 inaccuracies, 19 misleading statements and 23 other issues**. It is clearly not a document that is capable of robustly supporting such an important decision, one which will have such wide-ranging impacts on current and future generations of both humans and wildlife
- Trafford continuously provide misleading information in relation to the CRR (I have many examples of this), including in the latest report to the Scrutiny Committee (public reports pack 16th March 2022), in which they state that the "*Carrington Relief Road is a requirement of Trafford Core Strategy (2012)*". The 2012 Core Strategy estimated the costs of what was then called a "link road" at **£3m**, clearly anticipating a much less intrusive road
- Friends of Carrington Moss and Carrington Parish Council have requested details of the current and expected traffic volumes (HGV and other vehicles), which Trafford has been unable to provide
- There has been a consistent lack of resident support for the New Carrington development & CRR proposals, yet no forums have been created so we can provide input to the designs
- The decision was not reviewed by Scrutiny Committee in advance of approval.

Kind regards

Marj Powner