

Ms Marj Powner

[REDACTED]

Date 22 April 2022

Dear Ms Powner

Carrington Relief Road - Stage 1 Complaint – Ref: 2467415

Thank you for your correspondence complaining about the Council's approach to the Carrington Relief Road – I am sorry for the delay in responding to your email.

In your complaint you raise a number of matters connected to the proposed new Road – I will endeavour to respond to these in turn:

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 duelling, and there are a number of other costs about which I am unclear whether they are included or excluded from the £36m figure.

It should be noted that the costs of the scheme are likely to be significant and will also be subject to change given a range of factors including inflation which are seeing national infrastructure costs rise significantly. A report is being drafted for consideration by the Council's Executive Committee in the summer 2022 which will set out the indicative costs of the wider scheme but it will be noted within the report that the costs will only provide an indicative cost as these could well change over time as the scheme progresses. It should be noted that the scheme will require the identification of a range of funding options to be delivered.

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 route currently progressing towards a planning application (now known as Option F, Offline) is broadly similar to that identified in the Core Strategy in 2012, but has been through a series of iterations prior to its selection by the Executive in September. In the years following Core Strategy adoption, the indicative route was used by both the main developer in Carrington, Himor (now Wain Estates), and the Council, to develop the masterplan for the area. This helped affirm that it appeared to have merit as a potential route.

In 2018, this route was the subject of a business case for Growth Deal 3 funding. This appraisal was wide-ranging in its scope and the scheme was thoroughly evaluated and was subsequently granted conditional approval. Upon taking the lead in promoting the scheme further, the Council sought to satisfy itself that the originally identified route was the most appropriate solution and an initial options appraisal report confirmed that this was the case. In preparing that appraisal, the Council listened to concerns of residents about building on the green belt and so decided to fully evaluate the option of leaving traffic on the existing A6144 between Isherwood Road and Banky Lane.

This route was identified in the report as Option A – and the decision to include this option flowed directly from the feedback received from community groups and individuals such as yourself. It was fully recognised that a route based on the existing road alignment might have a number of benefits (landscape, agricultural land) – as well as certain challenges (road alignment, construction and junction design). However no single route is ever likely to be perfect in all respects – and the possibility of disbenefits was certainly no barrier to a route being recommended. In preparing the report for the Executive in September 2021, Council Officers were entirely open to recommending Option A if the evidence supported it – or indeed whichever route proved to be the most favourable.

Ultimately the report found that Option A could not deliver the benefits of removing traffic from the A6144 that Option F creates, nor could it provide a suitable standard of road safety, active travel, and public transport improvements that Option F does. The report also found that Option A was subject to risks over its deliverability in the timescales as it required residential and commercial land which would be subject to a hostile CPO process.

That is not at all to say that Route F does not itself have drawbacks – it certainly does – but the decision of the Executive is based on a balance of all of the considerations. It is also worth emphasising that the current preferred route will also be subject to further statutory consultation through the planning application process.

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.

These are precisely the balance of considerations which the options appraisal sought to address – but it is not thought, based on current evidence, that significant harm to wildlife species or habitats will arise from Option F. Once again, the current preferred route will be subject to further statutory consultation through the planning application process and will also benefit from pre-application consultation which will also consider the proposed scheme's impact on the natural environment. Detailed ecological work will accompany the planning application and this will inform the final route design and mitigation.

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 concept of sustainable development embodies a balance of economic, social and environmental factors – with no single strand taking primacy. The Council would not have chosen Route F if it thought it was incompatible with the principles of sustainable

development. Compliance with NPPF policy will ultimately be tested through the forthcoming planning application.

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

It is important to stress that the Carrington Relief Road is part of a wider package of planned transport improvements – and embodied within it are proposals to significantly improve safe cycling and facilities for buses. It should not be viewed in isolation from other planned transport measures. The Options appraisal also included a carbon assessment – the first time that had been done for major infrastructure in the Borough – responding directly to the 2018 Climate declaration and subsequent Carbon Neutral Action Plan.

Further detail on these issues is also contained within the Scrutiny Report dated 16 March 2022, specific consideration has been provided against the carbon considerations of the proposed route. The report sets out that one of the concerns raised in the public engagement exercise related to the potential disturbance of peat with the offline option (Option F). From the detailed invasive ground investigation work that has taken place along this alignment, peat has been encountered at one isolated location.

This was a small occurrence approximately 50mm thick at a depth of around 1.2m. It should be noted that whilst the area is generally known as 'Carrington Moss' the main area of historic moss land was located to the south of the proposed route alignment. Having found peat, albeit in a small and isolated instance, the project will commission the necessary further ground investigation work to better understand its extent. From information available at the present time, however, it is unlikely to be disturbed as the excavation for the road construction is unlikely to reach the depth of the peat.

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

The current preferred route will be subject to further statutory consultation through the planning application process and will also benefit from pre-application consultation which will also consider the carbon emissions as part of the proposed route. It should be noted that a guiding principle of the proposed scheme is to develop a modal shift to various forms of active travel such as walking and cycling by making the road network safer and to reduce the dependence on motor vehicles.

The project 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.

Trafford states that "Delivery of the scheme will support the growth ambitions articulated within the emerging Paces 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

The Places for Everyone Plan has now been submitted for examination to the Planning Inspectorate and so is the formally approved policy of the Council. It should be noted that the Places for Everyone Plan depends on a package of improvements, of which the Carrington Relief Road is one, the Road itself is required to facilitate development derived from the adopted Core Strategy

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)

It is not true that there are no plans for bus or other passenger transport improvements. All of Greater Manchester is now undergoing a series of bus reforms – with buses coming under the control of TFGM – enabling better coordination of routes and zonal ticketing (to also include trains and hire bikes). The Former Altrincham / Irlam Railway is also identified as a green travel route – and the Council will shortly be commissioning feasibility work for the re-use of this line. This will also help identify the steps involved in a wider use of the route. The provision of sustainable freight transport options will form part of the longer term thinking for the area and will await changes in national policy. Overall it is considered that the creation of the relief road will enable a better approach to the provision and operation of more sustainable transport options such as buses and safe cycling than the current constrained road network allows.

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

As set out above, it is not the case that sustainable modes are being ignored – and the design of the road will take proper account of ALL users. It should be noted that the Right Mix strategy still expects significant movement by road – huge resources are tied up into the current road network – and it would be absurd to ignore this. What needs to happen is for this road space to be used differently in future – and for cleaner, more efficient vehicles to utilise it. It is accepted that freight transport lags behind in this regard – but unfortunately unless and until there is a shift in national policy, it is unlikely that significant shift can occur in this arena, other than the move to electric or hydrogen vehicles.

In terms of net zero, a suite of potential improvements has now been identified to facilities for walking, cycling, public transport and for calming traffic generally within Carrington Village and along the current A6144. These measures represent a value of approximately £1m which it is proposed to incorporate into the overall CRR project budget, with an opportunity for a further £400k of improvements.

These would present significant steps towards the Council's stated objectives of reducing carbon use alongside of the aspirations of the GM Transport Strategy. Feedback from residents in Partington has described significant frustration that the current road network effectively isolates the area due to poor road conditions, congestion, lack of sustainable public transport and safe cycling opportunities. The relief road will create a significant opportunity for the Partington community to benefit from improved sustainable transport access, and to embrace new and improved active travel modes linking to the wider area.

A predetermined solution was identified prior to any public consultation (contrary to the Gunning Principles)

There has been no predetermination with the preferred route and the benefits and limitations to the various routes have been set out within both Executive and Scrutiny reports. As stated publicly at the March Scrutiny Committee, the process of optioneering was entirely open – and we could not anticipate the results until the analysis had been completed. As stated above, had Option A performed better overall, then there would have been no reason why the Council would not have chosen it.

No conscientious consideration has been given to resident feedback in relation to the CRR (contrary to the Gunning Principles)

The Executive report considered in September 2021 sets out a wide range of public questions and answers that have been summarised in Appendix 3. The information contained within Appendix 3 was available to members of the Executive to assist them in coming to a judgement on what the preferred route option they chose to support.

No consultation has been held with residents, yet a preferred option has been selected (contrary to the Gunning Principles)

The Executive report considered in September 2021 sets out a wide range of public questions and answers that have been summarised in Appendix 3. The information contained within Appendix 3 was available to members of the Executive to assist them in coming to a judgement on what the preferred route option they chose to support.

Whilst the pandemic unfortunately limited the ‘in person’ engagement that might normally have taken place - a significant effort was made to communicate with a wide a populace as possible – with large scale postcard distribution and a local media / poster campaign.

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)

The Statement of Community Involvement (SCI) sets out how the Council will engage with the community and involve people in the preparation of the Local Plan and other local development documents, as well as how the Council will consult on planning applications in Trafford.

The Provision of a strategic transport improvement at Carrington is already a formal policy of the Council. It is a provision of the adopted Core Strategy (Policy SL5.2) which was approved following several rounds of consultation and formal examination. The Options Consultation does not seek to revisit this policy position – but rather consider options for implementing it.

The formal planning application stage for the Carrington Relief Road will need to be in accordance with the SCI.

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

The current preferred route will be subject to further statutory consultation through the planning application process and will also benefit from pre-application consultation.

Feedback from residents was considered as part of the Executive report which set out the route options to be considered.

There has been NO Assessment of the Natural Capital Value of the options

The current preferred route will be subject to further statutory consultation through the planning application process and will also benefit from pre-application consultation.

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

This analysis of the option appraisal is a matter of opinion – the document was prepared by an experienced multi-disciplinary consultancy according to professional principles. Accordingly the Council maintains that it is suitable and appropriate for the task of picking a preferred option.

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.

The Carrington Relief Road does feature within the Council’s Core Strategy and was shown indicatively on a similar alignment. Development approved in line with the Core Strategy is currently subject to constraints and restrictive Grampian conditions until the road is progressed – demonstrating that road (and other transport) improvements are necessary to deliver the Core Strategy’s ambitions.

The Strategy envisaged a new road – and this was bound to be broadly similar to what is now being planned. The cost estimate of £3M was almost certainly a very significant underestimate, even in 2010. However the cost of the road is subject to a range of factors which will influence the final cost. As an example, at the time, inflationary pressures were not as significant as they currently are which is leading to upward revisions to a range of infrastructure projects.

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

In developing the scheme to the submission of a planning application in 2023, design development work is currently underway which includes creating a suitable traffic model with which to design the alignment and prospective road junctions to an appropriate level of detail. Once this work has been undertaken, we will be in a position to share the detail of this analysis and illustrate the short and long term nature of traffic flowing in the area. Of course, it must be noted that the new relief road will absolutely contribute to significantly reducing the proportion of HGV traffic using the A6144 which will provide significant relief to the community and business and create an environment to encourage more sustainable local transport in the area.

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 current preferred route will be subject to further statutory consultation through the planning application process and will also benefit from pre-application consultation.

The decision was not reviewed by Scrutiny Committee in advance of approval.

It should be noted that there was no requirement to review the decision made by the Executive on the preferred route of the relief road, however, a commitment has been made to ensure Scrutiny's ongoing involvement as evidenced in the Scrutiny Committee update on the scheme which was considered in March 2022.

I hope these comments are of assistance – we would be very happy to meet you in person (or over Teams) to discuss any matter in more detail if that would be beneficial. Otherwise I hope this letter adequately explains our response to your concerns. However if you remain unhappy with the response received please contact righttocomplain@trafford.gov.uk and your complaint and the Stage 1 response will be investigated at Stage 2.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'O Shimell', is centered below the text 'Yours sincerely,'.

Oliver Shimell
Inclusive Economy and Communities Manager