

## Complaint: Carrington Relief Road

Dear Mr Shimell

### Carrington Relief Road - Stage 1 Complaint – Ref: 2467415

Thank you for your response to my complaint about the handling of the Carrington Relief Road (CRR). I remain unhappy with the responses given and wish to proceed to a Stage 2 investigation.

I have outlined my reasons below:

- Some of your responses read like a sales brochure. Please remember, I, and other residents, have examined the documents provided by Trafford, TfGM, GMCA and others **in detail**. So, do not disparage my contributions with disingenuous information or statements such as “*huge resources are tied up into the current road network – and it would be absurd to ignore this!*” I, and others, are not ignoring any aspect of the available transport options and fully recognise that efforts to address the climate emergency and support nature’s recovery will not mean that we are moving back to the horse and cart. What is absurd is Trafford’s repeated disregard of residents’ attempts to engage in the process.
- Many of the issues I raised in my complaint have not actually been addressed, they have been avoided or misdirected! You did not, for example, provide any explanation to confirm why Trafford has ignored residents’ requests for workshops, why there has been no response to our feedback that improvements could be made to the design of Option A or how our ideas can be fed into the process. You do not explain why Appendix 3 of the Executive Report, considered in September 2021, did not include any reference to 21 of the 23 questions local community representatives raised. The omission means that the information available to members of the Executive was incomplete. This [FOCM blog](#) sets out resident concerns in more detail.
- It should be noted that the “public engagement” exercise was **NOT** a consultation. The communications campaign Trafford held confirmed that residents were expected to watch a video and raise any questions they had. This event was not published on Trafford’s Consultation Portal, residents were not asked to respond to any specific questions and were specifically advised that this exercise was not related to choosing a route option. You did not explain in your response why the public engagement did not follow the approach set out in Trafford’s CRR Options Consultation Report (dated 18th December 2020).
- In addition, it is clear that residents in this area have been treated **very** differently to those in other parts of Trafford, where there have been significant efforts to involve residents in design and decision-making and where assurances have been given about conscientious consideration of resident feedback ([What did Trafford do for Crossford Bridge & Stretford residents?](#)).
- You do not explain why this road is needed, given GM’s Transport Strategy Right Mix aim of **zero net growth in motor vehicle traffic between 2017 and 2040**, which suggests there should be no requirement to create capacity for increased traffic volumes. What you do seem to accept is that road space **WILL** be used differently in the future. Carbon targets, net zero and others are not distant aims, they are expected to be addressed in the period up to 2038 (less than 16 years away). Given this, the business case and justification for any new road should be robust and transparently available.
- Your assertion that a traffic model will be created to support the planning application does not address the fact that the decision to progress this scheme has been taken with a total disregard for that GM Right Mix aim and without a clear understanding of the current traffic numbers, those resulting from the planning approvals already given and the future traffic numbers expected if the New Carrington Allocation is approved.
- Regarding the carbon emissions, again there is no transparency. One month further on and I am still awaiting the response to my FOI request for the background papers that accompanied the Options Appraisal, including the carbon assessment. As these documents were created for a report that has already been presented to the Executive, there is no justification for the lack of transparency or for holding back these papers.

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- There is a huge lack of transparency in the decisions surrounding the CRR. Suggesting, for example, that the costs of the scheme “*are likely to be significant*” but giving no idea of what those “*significant*” costs may be is not a credible response to this important issue. The report to Scrutiny Committee on 16<sup>th</sup> March 2022 quoted a figure of £53m for the Poynton Relief Road (which is a shorter length than the proposed CRR, suggesting that the CRR costs could be at least **double the figures** mentioned in Trafford’s documentation so far). Given such information is available why is Trafford unable to at least provide an indicative range of likely costs to the Executive, to Scrutiny Committee and to residents?
- Regarding the initial Outline Business Case Document, FOCM [wrote to Trafford’s Chief Executive](#) to set out concerns about, among other things, the factual errors and misleading statements the report contained. The group expressed hope that future documents published by Trafford would not feature such inaccuracies, but, sadly, this trend has continued up to and including the latest Options Appraisal.
- Please explain what evidence you have that leads you to conclude that “*it is not thought, based on current evidence, that significant harm to wildlife species or habitats will arise from Option F*”. Natural England’s (NE) feedback to Trafford (22<sup>nd</sup> March 2021) stated clearly that Option F would be “*considerably more damaging than Option A*”. NE also noted that the Options Appraisal did **NOT** give an accurate representation of the issues. They further stated that the Options Appraisal gave an “*inaccurate and unbalanced view of the environmental constraints*”. These comments rather refute your suggestion that resident analysis of the option appraisal is “*a matter of opinion*”, especially when so many examples are available. See this [FOCM blog](#) for more detail.
- It should be noted that the assessment of the Natural Capital Value of the options is not related to the consultation (statutory or otherwise). This information should be transparently available to residents to help them understand why Route F has been chosen. The current plan contradicts the priorities set out in the 5 Year Environmental Plan for Greater Manchester and the Government’s 25 year environment plan, which specifically mentions the declining populations of farmland birds. Furthermore, a [recent research study](#) suggests that farmland bird populations (such as the lapwing and the skylark) are significantly affected by exposure to roads including up to 700m from the road itself. Given that Trafford has alternative options, the lack of consideration for the effect of habitat loss for these species is unacceptable and is not compliant with the Government’s Planning Guidance.
- I agree with your assertion that no single route is likely to be perfect in all respects but the way in which Option A was articulated was biased. As an example, whilst Option F confirmed that vehicle traffic would still be able to use the A6144, Option A did not take advantage of the existing public rights of way (PROWs) across Carrington Moss (including Carrington 1, which runs more or less in parallel to the A6144). Utilising upgraded PROWs would be less expensive and would significantly reduce the width requirement of the road. This approach would also be much safer, more healthy and more pleasant for active travel users (including horse riders). Residents do not believe there is any requirement to CPO properties, especially given GM’s aims to considerably reduce vehicle traffic over the coming years. It is only Trafford’s biased version of Option A that introduces risks for active travel users. Furthermore, with Option F, buses may be able to get up a bit of speed on the short stretch of the route that Trafford plans to dual, but the rest of the A6144 and other local roads do not change, so buses and other vehicles will still experience significant congestion during the rush hour period.
- In addition, the Option Appraisal suggests Option A brings risks to deliverability/timescales but does not mention the Option F risks in this category, that may be caused by resident and other objections and potential legal action, given the extensive environmental and social damage this route will cause.

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- Please confirm which document(s) sets out “the wider package of planned transport improvements” for the area. I have reviewed the Places for Everyone documentation, including the Transport Strategy 2040 and its associated 5 year Delivery Plan. I can find no documents showing any commitments for this area other than the CRR. There are no commitments to any sustainable passenger or freight transport options. For information, residents **HAVE** identified a number of potential solutions, including for sustainable freight, each of which would result in a reduction in traffic volumes.
- I remain baffled by Trafford’s repeated assertions that the project will benefit residents in Carrington and Partington. Trafford is not planning to close the existing A6144 to HGVs and through traffic, so Carrington will become a traffic island in a sea of air pollution, surrounded by increasing volumes of vehicles on all sides. Please confirm exactly how the residents of Partington will benefit from the CRR, as FOCM members who live there cannot understand this statement at all. They recognise that the number of vehicles using the A6144 will increase exponentially, including through traffic. Exactly what improved sustainable transport access will Partington residents benefit from?
- You do not mention the impact of this road on other Trafford residents, such as those who live in Sale West and those who use Carrington Moss (including those who play and train on the sports grounds). Trafford does **NOT** acknowledge that the health and wellbeing of some residents and users will be significantly impacted by this road.
- I also noted with interest the comments from Trafford Councillors at Scrutiny Committee in relation to the petition a Carrington resident presented to Trafford Council on 13<sup>th</sup> October 2021. The petition, against roads being constructed across Carrington Moss, had over 1,600 signatures, collected manually. Of these, over 93% were Trafford residents, contrary to the impression that was attempted to be made at Scrutiny Committee. The other 7% are people who use the Moss on a regular basis.
- In terms of other disingenuous statements, you will be aware that the Planning Inspector specifically highlighted the costs of the Carrington Link Road in their Examination report for the Core Strategy. The costs were amended to **£3m** “to reflect up-to-date information concerning the anticipated cost of a road link required to the Location”. I have requested the information associated with this update via an FOI request. I think this clarifies that the cost was not underestimated as you suggest in your response to my complaint. Clearly, the Planning Inspector considered £3m to be a reasonable cost for the road proposed at that time. Even with “inflationary pressures” it is unlikely that a road estimated to cost £3m in 2010 would become £34m (or possibly even £60m) in 2022.
- In fact, Trafford is very selective with the information referred to from the Core Strategy 2012 (again, there is an [FOCM blog](#) which highlights a number of issues). It should be noted that:
  - Contrary to your response to my complaint, paragraph 8.73 suggests that “The alignment of the link road to serve the development area and ease congestion along the A6144 **will be determined by the Carrington Area Action Plan.**” I raised an FOI request for a copy of this document and have been informed that it was never created. This paragraph confirms, however, that the alignment of the route was **NOT** determined in the 2012 Core Strategy.
  - Policy SL5.2 suggests that the new road infrastructure will serve the development area to relieve congestion on the existing A6144. There is no mention that this road will run across Grade 2 agricultural land, peat moss, wetland and woodland habitats. In fact, there are specific protections for such habitats set out in the Core Strategy. For Carrington, for example, Strategic Objective SO6 sought to (amongst other things) protect and enhance areas of environmental importance and to protect and enhance the Mosslands as a natural carbon sink to mitigate the effects of climate change. For Partington, Strategic Objective SO5 sought to protect, improve and enhance the quality and accessibility of biodiversity and green spaces. This is reinforced further in Policy L3.4.

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- Residents in Carrington, Partington and Sale West have been promised public transport improvements in both the 2006 UDP and the 2012 Core Strategy. Neither has delivered and there have been no “*projects*” to make these alternatives a reality for Trafford citizens. In the 2012 Core Strategy, for example, Policy SL5.2 emphasises significant improvements to public transport infrastructure including links to the Metrolink system. For Carrington, Strategic Objective SO7 sought to (in addition to improving the transport infrastructure) **secure significant improvements to the public transport infrastructure and** to secure improvements and use of pedestrian and cycling facilities along routes such as the Trans Pennine Trail. For Partington, Strategic Objective SO6 sought to **secure improved public transport linkages** in addition to improved highway links, improvements and use of pedestrian and cycling facilities along routes such as the Trans Pennine Trail, but also through maximising opportunities to create new routes. This is reinforced further in Policies L3.1 and L3.4.
- Policy L4.1 recognises that Carrington and Partington are **NOT** sustainable locations, with paragraph (e) once again reinforcing the requirement for developers to contribute towards improved access to more sustainable transport choices. I have seen no evidence that any developer has contributed to any sustainable passenger or freight transport. Please provide examples if you have them. In fact, despite the approval of so many applications that significantly increased HGV traffic, the focus in Trafford’s documentation is on the CRR, to the exclusion of all alternatives.
- For clarity, I do not bundle active travel together with sustainable passenger and freight transport options, although I have no examples of any investment in active travel either.
- Policy I3.18 clarifies that the “promotion of the Manchester Ship Canal as a sustainable transport route **is consistent with national guidance** regarding the protection, improvement and development of the water transport network. The enhanced role of inland waterways for freight distribution will have positive environmental benefits, in particular in terms of climate change”. Given this statement in the Core Strategy, I am unclear why Trafford is waiting for National Policy to shift to enable freight transport to be progressed. Please explain fully as I will take up any issues with my MP, Sir Graham Brady.
- The Core Strategy also specifically mentions a new crossing for the Manchester Ship Canal between Carrington and Irlam, yet Trafford has not progressed this. I already have a response to an FOI request to confirm this.
- You appear to suggest that the consultation in advance of the adoption of the Core Strategy 2012 satisfied the need to consult with residents on the policy aspects of the CRR. Yet, as mentioned above, the information in the Core Strategy document was minimal and the alignment of the route was to be developed within the aborted Carrington Area Action Plan. In addition, more than 10 years later, given no action on any transport improvements in the area, with the climate emergency declared and the carbon neutral goals published, it is astounding that Trafford would not wish to revisit this policy decision and undertake appropriate consequential consultation with its residents.
- It should be noted that the consultation approach for the Core Strategy was so poor that our FOI request response reveals that only 24 responses were received to the November 2009 consultation (very few from residents) and only 44 responses were received to the March 2010 consultation (again very few from residents).
- I continue to believe that the Gunning Principles have not been followed in relation to the CRR process. Furthermore, on such a sensitive matter, it is wholly unreasonable for Trafford to suggest that public consultation need only be carried out **after** the route has been chosen. With the recognition that the route across Carrington Moss would be controversial, it is very surprising that Trafford did not consider it appropriate to request a Scrutiny Committee review in advance of formalising the decision. Some of the questions identified by residents were helpfully highlighted by Scrutiny Committee members at their recent meetings.

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It is clear from the above that the CRR is **NOT** a requirement borne out of facilitation of “*development from the adopted Core Strategy*”. It has been nurtured in discussions with developers, **NOT** in consultation with residents. I understand that the original Outline Business Case document was created by the main landowner in this area (please confirm whether this perception is accurate). Trafford’s consistent refusal to consider the alternatives raises the issue of plan continuation bias. Trafford also makes no reference to the fact that Places for Everyone is a 16 year plan, which gives ample time to develop sustainable passenger and freight transport options, alongside upgrading the existing route and improving the PROWs across Carrington Moss. With all these points in mind, there is no justification for Trafford’s lack of consideration of solutions that would result in lower costs for the public purse, be less environmentally damaging and more acceptable to local residents.

Residents have consistently tried to work positively with Trafford (and Amey) in the hope that all interested parties (including the key stakeholder, residents) could work together to find solutions that will bring real benefits to current and future Trafford citizens **WITHOUT** impacting the health and well-being of existing and new communities or the habitats of red listed birds and endangered wildlife. Trafford has clearly not valued our contributions as they have consistently refused to invite us to the table to be part of the design process.

Kind regards

Marj Powner