

Local Government Ombudsman Complaint: Carrington Relief Road

Complaint – Trafford Reference: 2467415 (Marj Powner)

This document summarises the questions raised with Trafford, their responses and my further commentary for both the Stage 1 and the Stage 2 Complaint. Colour coding of the text is used to make it easier to see which commentator is the author of those specific points.

Stage 2 Complaint and Associated Response:

No.	Author	Detail
1	Marj Powner Stage 2 Complaint	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 “ <i>huge resources are tied up into the current road network – and it would be absurd to ignore this!</i> ” 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.
	Trafford Stage 2 Response	I am sorry if this was the case – Mr Shimell was seeking to explain the approach taken by the Council – and in particular explain some of the merits of the scheme as the Council sees it. That inevitably means expanding on the some of the benefits of the project – because they are the reasons why the Council is pursuing the road and related transport improvements.
	Marj Powner Commentary	Trafford is still being selective in their responses, I have no problem with the “benefits” of the road being emphasised, as long as the information is balanced and factual, this means the “disbenefits” should be clearly highlighted too. The published reports are biased and misleading, examples of which are highlighted throughout this document but can also be seen in our recent blogs .
2	Marj Powner Stage 2 Complaint	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.

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	Trafford Stage 2 Response	<p>I am sorry if the response from Mr Shimell seemed to defect or avoid your concerns. When we met I acknowledged that we had not been able to progress the road in the way that we had originally envisaged. Whilst it is easy to employ the pandemic as an excuse – it genuinely interrupted our plans for community participation. This arose in two ways – firstly staff were deflected into tackling the pandemic (either directly or through serving new priorities such as Business grants) – and then secondly the kind of ‘round table’ discussion or ‘drop in’ meetings were simply not possible for much of 2020 and 2021. As we discussed we are keen now to convene these sort of meetings once more – and I can only apologise that we have not had either the ability or capacity to do this until now.</p>
	Marj Powner Commentary	<p>This is a deflective answer once again and does not answer my question.</p> <p>Trafford has held and attended online meetings and workshops during the period mentioned and residents were not asking for face-to-face events.</p> <p>If staff were able to continue fast-tracking the Carrington Relief Road (CRR), despite the resourcing challenges mentioned above, the opportunity to host online meetings with resident representatives was possible too.</p> <p>Resident representatives did have one online meeting about the road on 8th March 2021. This is when we raised our questions in response to the public engagement exercise mentioned in question 3 below.</p> <p>I specifically requested the opportunity to feedback our inputs to Option A (residents strongly believe this option can be significantly improved) and I repeated our request for workshops to discuss specific issues. The project team were unable to respond to any of our questions at the meeting itself. As no response was received from the project team, or their manager, despite chasing, these requests and our questions were subsequently forwarded to other Senior Managers in Trafford. To date, I have still received no reply and my question about why there has been no answer is still not answered in this complaint response.</p> <p>Trafford cannot use the pandemic as an excuse for the lack of public consultation given that the CRR has progressed apace through various Committees, despite the resourcing issues highlighted in the answer above.</p> <p>If Trafford consider that the limited public engagement exercise of Spring 2021 was a consultation, the lack of conscientious consideration of our feedback would be a breach of the Gunning Principles (see our response to question 3 below, which confirms why residents do not consider this exercise to have been a consultation).</p> <p>It should be noted that residents believe that our ideas will create a solution that is less environmentally damaging, more acceptable to local residents and less costly to the public purse.</p> <p>The response also does not answer my question about why Appendix 3 of the Executive Report, considered by Trafford Councillors in September 2021, did not include any reference to 21 of the 23 questions local community representatives raised on 8th March 2021.</p>

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		<p>It should be noted that a report has recently been published for the Executive Committee on 25th July 2022 (see from page 443). The document states (erroneously) that “<i>There has been significant consultation and engagement carried out as part of getting to the current position</i>”.</p> <p>This is factually incorrect, there has been NO consultation about this road to date.</p>
3	Marj Powner Stage 2 Complaint	<p>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).</p>
	Trafford Stage 2 Response	<p>Regrettably I think the merits of the engagement are a matter on which there remains disagreement. The Intention of the engagement was to inform as many residents about the plans and to gather their views. With this in mind we sent postcards directly to addresses throughout the local area. This was with the express purpose of raising awareness of the scheme and gathering public views on it.</p> <p>There may be different views as to the effectiveness of this exercise – but a genuine effort was made to contact a wide a group of local people as possible and seek their views. All comments were welcome – and nothing was ‘off the agenda’ in terms of what could be said.</p>
	Marj Powner Commentary	<p>Informing residents is very different from consulting them!</p> <p>If the intention was to gather resident views, why were we not asked for our views? We were only asked to raise any questions we had about the content of the video! It is not acceptable to say now that “<i>All comments were welcome</i>”, if the public were not informed at the time that this was the case. We were explicitly told, for example, that the exercise was NOT for giving our opinions on the route (otherwise, believe me, there would have been a lot more than 123 responses).</p> <div data-bbox="507 1541 901 1937" style="border: 1px solid black; padding: 5px; margin: 10px 0;">  <p>ameyconsulting  TRAFFORD COUNCIL</p> <p>Public Engagement</p> <p>A presentation explaining the options appraisal process and the next steps to chose the preferred route option for the Carrington Relief Road is now live on the webpage.</p> <p>If you have any questions, or there are any aspects of the scheme you would like to know more about you will have until 22nd March to send your questions through to CRR@amey.co.uk.</p> <p>These questions will then form the next phase of engagement. This will be a series of more focused sessions which will answer your questions.</p> </div> <p>There is more information about the “public engagement” exercise in this blog.</p>

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		<p>If this was a consultation, why was it not publicised on Trafford's Consultation Portal which covers a range of different community consultations, or the Strategic Plan Consultations page, which have their own link. Some consultations are mentioned on both sites but the Carrington Relief Road is NOT mentioned on either!</p> <p>Why were residents not asked explicit questions, such as, for example, "<i>which route would be your preference</i>"?</p> <p>It should be noted that, despite what is said on the postcard above, there has been no "<i>next phase of engagement</i>" and "<i>no focused sessions</i>" to answer our questions.</p> <p>Furthermore, the complaint response does not confirm why the public engagement exercise did not follow the approach set out in the Delegated Executive Member Decision Report about the Carrington Relief Road Options Consultation (18th December 2020).</p>
4	Marj Powner Stage 2 Complaint	<p>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?).</p>
	Trafford Stage 2 Response	<p>The Critical difference between these sites and that of Carrington is that the proposals for the redevelopment of Carrington have been through the formal consultation and examination of the development Plan. At Stretford and Crossford Bridge the Council was seeking views at an early stage – in respect of the former, it was with a view to preparing a statutory development plan for the area (An Area Action Plan).</p> <p>At Carrington, that process was completed some time ago – and in the meantime developments have come forward in line with Core Strategy Policy SL5 – and these in turn drive the need for infrastructure improvements. The detailed design and alignment of the Relief Road will be subject to the consultation and public scrutiny of the planning application once its submitted. As we discussed when we met I have instructed the design team to liaise with local groups such as yourselves so you can have a meaningful input into that design process.</p>
	Marj Powner Commentary	<p>I have lived in my house for over 37 years, I am extremely active in the local community. I have never been invited to give my opinions on a "blank sheet of paper" about any of the huge developments planned for this area. In fact, the consultation of the New Carrington Plan was so poor that local residents did not know anything about it until the local landowner put "trespassers will" signage up on public rights of way (including the Transpennine Trail). See the attached graphic showing the history of consultation about the plans for this area (including the number of responses).</p> <p>I am confused about whether the Carrington Relief Road is in or out of those development plans (which are known as Places for Everyone – P4E). Trafford is now saying that the CRR is being handled outside of P4E, so at what point in the "<i>early stage</i>" of the plan for the road did I have the opportunity to input my views?</p>

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		<p>The Core Strategy 2012 did not give me that option, there was insufficient information to enable residents to give this topic intelligent consideration (another breach of the Gunning Principles if this was considered to be a formal consultation about the road), so they would not have been able to determine the impact on their local area, or on their health and wellbeing. Even if there had been, the Core Strategy was so badly communicated to local residents that very few responded – see question 24 below, I was not even aware of it at that time.</p> <p>The consultation Trafford will be undertaking in the future is based on the road being constructed across Grade 2, best and most versatile, agricultural land, wetland, woodland and peat moss. Residents want to be consulted on alternative routes and more sustainable solutions.</p> <p>That Core Strategy 2012, did suggest a number of sustainable transport improvements, including use of the Manchester Ship Canal, resurrecting the way lines into the area and, because the area is so poorly served by public transport, promised significant improvements (as Trafford also did in their 2006 UDP). It also proposed construction of a bridge across the Manchester Ship Canal, which would take HGV and other traffic to a major road connecting to two motorways.</p> <p>The document did mention a link road in the Carrington area but it had a cost of just £3m (verified specifically by the Planning Inspector), so not the same type of road as the one now costing c£60m.</p> <p>Trafford has not investigated any of these sustainable transport solutions. They are suggesting that the road will improve bus services because they will be able to be on time (this is highly unlikely because of the plans to significantly increase the volume of traffic using the planned route, which will cause further congestion and will negate any stated benefits for the limited existing bus services). In addition, the response to an FOI request, attached, states that <i>“There are currently no committed schemes to improve public transport in this area”</i></p> <p>I consider it to be negligent of Trafford to continue to approve planning applications, particularly for industrial and warehousing developments, in an area which has very limited access to bus services and no access to any other sustainable passenger or freight transport, when they are undertaking NO investigations into solutions other than constructing a road across green belt and the important habitats mentioned above. The Planning Committee should at least have raised this issue with the correct department.</p> <p>Whilst paragraph 111 of the National Planning Policy Framework states that <i>“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”</i>, it also states that (paragraph 113) <i>“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”</i>. Residents have been requesting information about expected traffic numbers for over 2 years. The lack of responsiveness resulted in an FOI request (by Carrington Parish Council), to which Trafford confirmed they could not provide the information. If this is the case, how can the <i>“likely impacts of the proposal”</i> be assessed.</p>

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5	Marj Powner Stage 2 Complaint	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.
	Trafford Stage 2 Response	<p>The road is needed in order to improve access to Partington and Carrington – and critically to enable development permitted by the 2012 Core Strategy to proceed. The existing A6144 is unsuitable for the volume of traffic now using the road and principal junctions are now at (or approaching) capacity. You will be aware that a number of planning applications in the area are subject to a 'grampian' type condition which restricts their full development until the road is further progressed (e.g residential development at Heath Farm Lane) This underlines the need for highway improvements now – notwithstanding any future growth included within the Places for Everyone joint Local Plan (PFE) now at Examination.</p> <p>In terms of the Right Mix strategy, it must be recognised that the modal shifts envisaged under the strategy will not occur equally – and where there is significant new development (such as Partington and Carrington) it is inevitable that the volume of traffic will rise. The Objective will be to try and ensure that highways are sufficient but not 'over provided' and that whenever a highway improvement is planned, it places walking, cycling and bus provision at the forefront of the design concept.</p>
	Marj Powner Commentary	<p>The inequity of situation caused by Trafford is highlighted in this response. Some residents will be exposed to significantly higher levels of air, noise and light pollution caused by increasing traffic volumes, whereas others will have the pleasure of significantly reduced traffic to achieve the goals in this Strategy.</p> <p>Stating that existing Planning Applications include "Grampian" conditions confirms the road is a predetermined decision, despite the lack of consultation and information.</p> <p>The existing A6144 would not be congested during rush hour if the volume of traffic using the road and the principal junctions was alleviated by the introduction of sustainable passenger and freight transport solutions. Trafford has caused this problem and is now bullying its residents into accepting a harmful (to health) road across important habitats to meet need caused (and to be exacerbated) by the Council's irresponsible decisions.</p> <p>It is certainly not inevitable that, where there is significant new development, the volume of traffic will rise.</p>

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		<p>I, and other residents believed the reason for the GM Transport Strategy stating that (page 4) the “<i>Right Mix vision is for 50% of trips to be made by sustainable modes, with no net increase in motor vehicle traffic, by 2040</i>” and that (page 8) “<i>Achieving the Right Mix is expected to lead to zero net growth in motor vehicle traffic in Greater Manchester between 2017 and 2040</i>” was because sustainable transport options would be prioritised by all Authorities in GM. It seems this is yet another document which contains spurious and misleading statements and which has goals that Trafford can ignore if they want to!</p> <p>As mentioned above, the Core Strategy anticipated that Trafford would progress a number of sustainable transport improvements. If it was considered appropriate to progress development “<i>permitted by the 2012 Core Strategy</i>”, why has no work been undertaken to progress the sustainable passenger and freight transport services that were also set out in that 2012 Core Strategy?</p> <p>It is my understanding that the Local Authority has a duty of care for its residents. Upholding this duty of care means that residents’ health/wellbeing and life expectancy should not be impacted by increased air, noise and light pollution.</p> <p>Incidentally, GM’s Right Mix Technical Note (January 2021) states that the “<i>vision of no net increase in motor-vehicle traffic includes trips by Greater Manchester residents, as well as trips by non-residents and goods vehicle movements</i>”. It does not say – except in areas where there will be growth in housing or employment!</p>
6	<p>Marj Powner Stage 2 Complaint</p>	<p>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.</p>
	<p>Trafford Stage 2 Response</p>	<p>With a project such as this evidence is prepared proportionate to the stage that the project has reached. Consequently there will be an incremental gathering of technical information as the project proceeds. At the point of making a decision as to route options (executive of September 2021) it was neither necessary nor appropriate to have completed detailed traffic modelling – this is done once the route has been chosen in principle.</p> <p>Detailed traffic modelling is now planned under the current phase of design and feasibility work – and will be carried out in collaboration with TFGM</p>
	<p>Marj Powner Commentary</p>	<p>Detailed traffic modelling is not what was requested. It cannot be proportionate to have no idea of the traffic numbers (current traffic volumes, traffic expected once the developments have been completed and traffic expected in the future, should this road be built).</p> <p>If Trafford has no traffic numbers available, how do they know they even need a new road? Providing information after the route has been chosen is a breach of the Gunning Principles as this is a key piece of data that residents should have had access to in advance of any theoretical “consultation”.</p>

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		<p>As mentioned above, residents have been requesting information about expected traffic numbers for over 2 years. The lack of responsiveness resulted in an FOI request (by Carrington Parish Council), to which Trafford confirmed they could not provide the information.</p>
7	<p>Marj Powner Stage 2 Complaint</p>	<p>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.</p>
	<p>Trafford Stage 2 Response</p>	<p>As I explained when we met there is not necessarily a full suite of subordinate documents that sit behind the options appraisal report – rather assessment work was carried out which fed directly into the report itself. This means that reports may have been asked for which do not exist</p> <p>I do however acknowledge that there has been an unfortunate delay in passing over some of the reports – this is in some cases accounted for by the fact that many of the consultants who worked on the project originally have now left Amey – and so it has taken longer than usual to access their files. There have also been instances where additional explanations or analysis have been requested – but unfortunately such information does not currently exist and so could only be provided by the relevant consultants carrying out additional work – the cost of which sits outside the reasonable parameters of Freedom of Information.</p> <p>More recently you have helpfully set out where you consider documentation is outstanding – and the Council is now working to address each of these.</p>
	<p>Marj Powner Commentary</p>	<p>I requested the carbon implications of the New Carrington development (including the CRR) via an FOI request on 18th August 2021. Trafford eventually responded (14th March 2022) that they were unable to provide the information.</p> <p>Trafford included calculations about the carbon implications of the CRR in their CRR Preferred Option Report. I raised a further FOI request (on 11th January 2022) for the background documentation that supports this report. I am still awaiting a number of these documents, including the carbon emissions data. I have not requested “<i>additional explanations or analysis</i>”. I do not understand why the figures relating to a report that has been presented to Committee almost a year ago, still cannot be provided.</p> <p>I would like the carbon data as I believe there are errors in the Preferred Option Report, which suggests, for example, that the route across Carrington Moss (which Trafford says will result in 30% more HGV journeys during construction) results in lower carbon emissions than upgrading the existing road (Option A).</p>

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8	Marj Powner Stage 2 Complaint	<p>There is a huge lack of transparency in the decisions surrounding the CRR. Suggesting, for example, that the costs of the scheme “<i>are likely to be significant</i>” but giving no idea of what those “<i>significant</i>” costs may be is not a credible response to this important issue. The report to Scrutiny Committee on 16th 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?</p>
	Trafford Stage 2 Response	<p>In terms of the cost of the scheme – this is very linked to the detailed design. Until the design is progressed and in particular the detail of any structures is worked through any cost estimate will be exactly that – only an estimate of the final cost. An example of this is the crossing of the ‘burford’ railway line – a section of route where there is reasonable consensus. The design solution here may involve retention of a bridge, replacement of the bridge with an embankment or a completely new bridge. Each has different cost implications.</p> <p>There is a further difficulty at present which is the disproportionate rise in material costs which is affecting all construction – and the more recent rise in inflation generally. Accordingly we have not sought to update the cost estimate too frequently as there have been too many variables – However a cost estimate will be provided within the forthcoming report to the Executive in July.</p>
	Marj Powner Commentary	<p>I now have the updated costs, which were included in the Executive Committee Report (from page 443) of 25th July 2022.</p> <p>My analysis of this report, which, once again, contains factual errors and misleading statements, is available at this link. As an example, on page 19 of the Executive Report, the author states that “<i>There has been significant consultation and engagement carried out as part of getting to the current position.</i>” There has been NO consultation to date. Residents are paying for such reports to be produced, they should at the very least be factually correct!</p> <p>In relation to the costs, these have increased from £3m in 2012, to £30m in 2018 and are now sitting at nearly £60m (what is almost certainly an underestimate). There is a huge gap in the committed funds for the road, with the Council suggesting that the balance will be raised via S106 and CIL. This may impact other deliverables from these funds, such as affordable housing, yet there is no mention of this in the report. Trafford needs to make such implications more visible.</p> <p>Even the worst-case budget set out in the report seems very optimistic and the contingency figures seem very low (at only 6%, 8% and 11% - Best, Likely, Worst case respectively).</p> <p>To further demonstrate my point about the lack of transparency, another piece of information missing from this report concerns what happens if there is an ongoing shortfall in funding (I personally think even the Worst case cost is underestimated). This is an incredibly sensitive scheme, extracting information from Trafford is like drawing teeth, it is not acceptable to be faced with such incomplete, inaccurate and misleading information.</p>

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9	Marj Powner Stage 2 Complaint	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.
	Trafford Stage 2 Response	<p style="color: red;">The Council does not accept that the options appraisal contains misleading statements. The appraisal inevitably contains elements of professional judgement and analysis – which I accept you may disagree with. The appraisal was prepared by a suitably qualified team of professionals – with a clear remit to assess the options fairly – and make recommendations on the best route. In making that judgement I understand that others may take a different view, but that does not mean that the report was improperly prepared.</p>
	Marj Powner Commentary	<p>In reviewing the CRR Preferred Option Report in detail, I found:</p> <ul style="list-style-type: none"> • 17 points of bias • 14 contradictions • 10 inaccuracies • 19 misleading statements • 23 other issues. <p>These are discussed here and this is not about opinions, nor about whether I disagree with the Preferred Option chosen. This is about the way the available information was articulated or omitted. As a consequence, I do not believe this report was capable of supporting such a major decision that impacts the health and wellbeing of so many people. I have summarised some examples below and in other parts of this complaint.</p> <p>Trafford omitted information, such as that provided by Natural England, which suggests Trafford's choice of route (Option F) would be "considerably more damaging" than the alternative (Option A). Given that Natural England raise such major concerns about the findings of the desk top study not being fully reflected in the Option Appraisal, that there is "not an accurate representation" of the environmental constraints, that the "environmental risks have not been included", creating an "inaccurate and unbalanced view of the constraints", it is wholly unacceptable that Trafford did not highlight this feedback, not only in the report but also to Trafford's Scrutiny Committee.</p> <p>In addition, Natural England advised that Trafford undertake a full Environmental Scoping Report in advance of selecting a preferred route option for the Carrington Relief Road. Yet Trafford ignored this advice.</p> <p>Despite the ecology/biodiversity along the chosen route (Grade 2 agricultural land, wetland, woodland and peat moss), and the recognition that this area is the breeding and feeding grounds for over 20 red listed birds and other endangered wildlife, it seems Trafford wants to minimise the focus on the environmental impact of this road.</p>

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		<p>The document does NOT consider disruption for anyone other than those driving vehicles. So, the disruption and health/wellbeing impact caused by Option F to users of Carrington Moss, the SEN children who use Carrington Riding Centre, the adults and children who play and train on the sports grounds and the people who live in Sale West, is not even mentioned in the report. The noise, vibration and dust nuisance to these communities, along with the flood risk (as the area to be constructed is regularly covered in significant levels of surface water) is also not mentioned.</p> <p>In addition, Trafford's statement that access and egress for Option F will add minor disruption to Carrington Lane is a massive understatement given that they say there will be 30% more HGVs for this route option!</p> <p>Furthermore, Trafford suggests that Option A would "<i>compromise the high-quality active travel provision the scheme is required to provide, which is one of the main scheme objectives</i>". This is incorrect. If Option A had been chosen, there are already a number of existing active travel routes across Carrington Moss. Trafford also suggests active travel commuters would prefer Option F. This is, once again, incorrect, as shown by the feedback to the Walking, Cycling, Horse riding Assessment and Review (WCHAR). Active travel commuters would prefer Option A, so they have uninterrupted routes across Carrington Moss (which, as noted in the report, is the shorter route).</p> <p>This segregated active travel approach would also be preferred by leisure users, as routes across the moss will be much more pleasant, healthier and safer (compared to walking, cycling and horse riding next to huge volumes of speeding traffic, with the accompanying significant levels of air, noise and light pollution).</p> <p>The document suggests 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". This is also incorrect for three reasons. Firstly, the A6144 runs from Sale to Warburton, Option F covers only a very short Eastern stretch. Secondly, the document confirms that only 64% of vehicle traffic is expected to use the new route (and the Option F route is likely to induce additional traffic onto this stretch of the A6144). Thirdly, the document states that the A6144 is expected to have a design speed of 40mph. So active travel users will NOT have a more friendly route over the full length of the A6144, nor will they experience a quieter, reduced speed road. Why is it acceptable for such statements to be made when they are clearly incorrect?</p> <p>In terms of conflicting statements, as an example, Trafford suggest that, if Option A was progressed, the active travel facilities that could be provided along the A6144 Carrington Lane would be limited due to width constraints but if Option F is chosen, the existing road (ie the A6144 Carrington Lane) will be upgraded to provide active travel provision. Surely, this would not be possible, due to those width constraints!</p> <p>All in all, this is, once again, a very misleading report. I am appalled that it is acceptable for public sector bodies to produce such disingenuous information. I one hundred percent understand that they will want to share what they perceive to be the benefits of this road but they should be clear, honest and transparent about the disbenefits too.</p>

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10	Marj Powner Stage 2 Complaint	<p>Please explain what evidence you have that leads you to conclude that <i>“it is not thought, based on current evidence, that significant harm to wildlife species or habitats will arise from Option F”</i>. Natural England’s (NE) feedback to Trafford (22nd March 2021) stated clearly that Option F would be <i>“considerably more damaging than Option A”</i>. 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 <i>“a matter of opinion”</i>, especially when so many examples are available. See this FOCM blog for more detail.</p>
	Trafford Stage 2 Response	<p>On 5th March 2021, Natural England were emailed an invitation to participate in the public engagement exercise and they responded with a letter, by email, on 22nd March. This response is based on what was known then about the site and the likely impacts of the various options. It was not based on any specific detailed assessment carried out by NE.</p> <p>This response was duly logged, categorised as part of the overall analysis, and then forwarded to the Environmental Consultant for consideration in their environmental appraisal on 24th April 2021, shortly after their appointment. Consequently the Consultants were fully apprised of the views of Natural England when undertaking their detailed work – and so would have been fully aware of the concerns about route F. Having carried out a more detailed assessment of the options, the consultant was then able to reach the conclusion quoted above.</p> <p>In particular it is worth noting that the NE letter explains the basis of their statement - which is related specifically to the concern that Option F carries a higher risk of destroying critical peat bogs and associated habitats. This is not a new concern to The Council, which is why a physical ground investigation survey was undertaken along the proposed route. Having done this work, we now have a very accurate understanding of the peat content of the ground along the route, and fortunately it is insignificant, or non-existent, despite high-scale geological mapping implying otherwise.</p> <p>Further investigation work will be carried out as the scheme developments – but the absence of Peat, aside from one small location, is part of the background for the conclusions reached. As ever there will be professional judgements involved in reaching that opinion – but the consultant involved was suitably qualified and acting completely without bias or direction from the Council – other than to provide properly informed advice.</p>
	Marj Powner Commentary	<p>Once again, there is no answer to my actual question. Whilst the Environmental Consultant may have done an assessment, what evidence did that appraisal obtain? This response does not provide even a list of the data acquired as part of this process.</p> <p>This is important as are over 20 red listed birds that breed and feed on Carrington Moss, including ground nesting farmland birds that are known to be in considerable decline, along with a number of other endangered wildlife species. Research suggests the road will have a significant impact on these species.</p>

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No.	Author	Detail
		<p>Given that Natural England is the Government’s adviser for the Natural Environment in England, it is astounding that their feedback did not feature in any way in the CRR Preferred Option Report or the associated Appendix 3 Public Engagement Summary.</p> <p>In addition, as mentioned above, Natural England advised that Trafford undertake a full Environmental Scoping Report in advance of selecting a preferred route option for the Carrington Relief Road. Yet Trafford ignored this advice.</p> <p>Whilst Trafford did not find significant levels of peat in their Ground Investigation Survey of the route itself, they will be acutely aware that the remaining peat moss will be extensively impacted by draining and constructing along the current route alignment, which is adjacent to the main body of peat. This will change the hydrology of the area, resulting in a huge environmental impact. A detailed academic survey in 1995 confirmed that there was around 325 hectares of peat remaining on Carrington Moss at that time (further information about this study can be sent on request).</p> <p>In addition, Natural England has now issued (20th June 2022) a further notice to Authorities with a known peat presence within their Cheshire to Lancashire Area Team geography, including Trafford. This letter highlights their concerns in relation to development on peat and the implications in respect of both carbon emissions and the loss of wider environmental benefits.</p>
11	<p>Marj Powner Stage 2 Complaint</p>	<p>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 alterative 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.</p>
	<p>Trafford Stage 2 Response</p>	<p>Whilst these factors may not be referenced specifically within the report, part of the task of the environmental assessment was to examine the impacts on local ecology – including farmland and other birds. A more detailed Environmental impact is being carried out to accompany the forthcoming planning application. The determination of that application will decide whether or not the proposals adequately conform to national and other planning guidance and policies.</p>
	<p>Marj Powner Commentary</p>	<p>Given there was no information in the Preferred Option Report, it remains to be seen whether the more detailed work to assess the environmental impact of this road will be comprehensive (and whether it will cover the breadth of the Natural Capital assets that will be affected). What it will not do is compare the Natural Capital assets between the two routes, which is what should have been available for review as part of the Option Appraisal.</p>

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12	Marj Powner Stage 2 Complaint	<p>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.</p>
	Trafford Stage 2 Response	<p>In terms of bias, as I mentioned when we met, the instruction to the consultant team was to treat all options equally and to take a consistent approach. There is no motivation or reason for the Council or its specialist team to be bias in this regard – the choice is between two reasonable route options – both of which have various benefits and dis-benefits. I can see no financial, political or similarly 'machiavellian' reason to be bias towards Option A; the Council or its partners gain nothing from trying to push one option over any other.</p> <p>Consequently whatever might be perceived as bias are, I believe, more matters of different judgement and weight attached to competing considerations. For example, on the matter of the rights of way across the fields, the merits of upgrading these was considered – but ultimately it was concluded that it was better overall to have cycleways adjacent to the main carriageway where there is natural supervision. I agree that separate routes across fields will be perceived as a pleasant option in summer – but it would not necessarily be so on a wet, dark afternoon in winter.</p> <p>To reach a conclusion in favour of an option is not to say that alternatives have been ignored or that the consultancy team are biased in favour of a particular outcome – it is often simply a matter of differing professional judgement.</p>
	Marj Powner Commentary	<p>As mentioned in my response to question 9 (above), in reviewing the CRR Preferred Option Report in detail, I found:</p> <ul style="list-style-type: none"> • 17 points of bias • 14 contradictions • 10 inaccuracies • 19 misleading statements • 23 other issues.

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		<p>I will not repeat the issues I found in this response but would suggest that Trafford has (contrary to the Gunning Principles) predetermined their preferred route option, with developer input (and no consultation with their residents). This route alignment has been published since 2019 in various documents, including the Greater Manchester Spatial Framework, now known as Places for Everyone.</p> <p>The fact that Option A was articulated as an all-but undeliverable solution, including reference to multiple (unnecessary) Compulsory Purchase Orders (CPOs), is evidence of this predetermination, as is Trafford's refusal to allow residents to input their ideas to improve Option A (mentioned in my response to question 2 above). I do not believe that our repeated requests would have been continuously ignored if the route option had not been predetermined.</p> <p>Furthermore, the requirement for CPOs for Option A related to the lack of road capacity for active travel, with Trafford stating that this <i>"would compromise the high-quality active travel provision the scheme is able to provide, which is one of the main scheme objectives. For this reason, Option A is seen as being an unrealistic route choice in terms of Land Availability."</i></p> <p>As mentioned previously, there are numerous existing active travel routes across Carrington Moss, these are well used in all seasons by walkers, cyclists and horse-riders. The conclusion that <i>"it was better overall to have cycleways adjacent to the main carriageway where there is natural supervision"</i> is mystifying and is certainly not the consequence of discussions with local residents and users of the existing active travel routes across Carrington Moss.</p> <p>Our own traffic count data suggests that there are currently around 200 HGVs an hour during rush hour and over 120 per hour at other times. To suggest that commuters and leisure users would prefer to walk, cycle or horse ride (along a longer route) next to huge numbers of fast-moving HGVs and car traffic, whilst breathing in the associated air pollution, is, quite frankly, bizarre.</p> <p>It should be noted that the latest document Executive Committee Report (starts page 443) confirms that multiple CPOs are required for the chosen route, despite their being no mention in the Option Appraisal that these would be necessary. In fact, quite the opposite, the Preferred Option Report (POR) states, in relation to Option F, that <i>"A basis for dedication has already been discussed in principle with HIMOR for the land in their ownership that may be required for the relief road. This significantly reduces the risk of requiring compulsory purchase orders for this land"</i>. This is interesting given that four of the ten CPO sites on the chosen route are owned by HIMOR (now Wain).</p> <p>In addition, the POR said <i>"If the space required to construct a scheme to meet the scheme objectives is not available, or if it will lead to lengthy negotiations with landowners, it cannot be considered a suitable route."</i> Yet, there will now be lengthy negotiations with landowners regarding the CPO requirements of the chosen route!</p> <p>It is clear that the POR was either badly worded or deliberately misleading. Either way, to dismiss one route because of the requirement to CPO, then admit that CPOs will be required for the chosen route does not seem very professional to me!</p>

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13	Marj Powner Stage 2 Complaint	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.
	Trafford Stage 2 Response	<p style="color: red;">There is a genuine distinction to be drawn between the two options in this regard. Option A was very likely to involve the acquisition of third party land directly adjacent to residential properties – whereas Option F does not – but instead utilises land within the control of Wain Estates who are supportive of the project.</p> <p style="color: red;">That is not to diminish the risk of challenge at each and every level with a project of this nature – but it is a real difference in the nature of risk as it relates to land, control and deliverability.</p>
	Marj Powner Commentary	<p style="color: green;">Given it is now clear, as mentioned above, (following the publication of Trafford's latest report) that Trafford is planning to CPO land on the chosen route (which was NOT mentioned in the Preferred Option Report). This surely suggests that this deliverability/timescale risk should have been highlighted for Option F, in addition to Option A.</p> <p style="color: green;">Furthermore, I do not understand why Trafford only highlighted one aspect of the risks relating to deliverability/timescales, limiting notification to Councillors to (some of) those risks relating to land, control and delivery (eg CPOs for Option A only). This means the Councillors did not have a clear understanding of the full range of risks relating to deliverability/timescales.</p> <p style="color: green;">Trafford states that Option F utilises land within the control of Wain Estates “<i>who are supportive of the project</i>”. This is unsurprising as Wain (previously known as HIMOR) were the originators of the CRR proposal and, despite being unable to share any information with residents or allow their own citizens to provide input, Trafford were able to engage with Wain, and other landowners, to design the New Carrington Masterplan.</p> <p style="color: green;">As mentioned above, the comment about land being within Wain’s control is interesting given that four of the ten CPO sites on the chosen route are owned by Wain. Why would it be necessary to CPO sites on the Western part of the route, if land on the Eastern part does not need to be CPOd?</p> <p style="color: green;">In addition, there are other risks to deliverability/timescales. I mentioned two in my question above. I totally understand that each of those risks will have different probabilities and impacts but why did the Option Appraisal not consider all deliverability/timescale risks for both options?</p> <p style="color: green;">Clearly Trafford does not consider the probability of resident objections or legal action delaying the project timescales to be as major an issue as the CPO requirements but there are other risks to deliverability/timescales, including, for example, flooding and drainage issues, financial issues (such as further cost increases or delays to securing funding) and unexpected discoveries (eg contamination, peat, historical artefacts).</p>

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14	Marj Powner Stage 2 Complaint	<p>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.</p>
	Trafford Stage 2 Response	<p style="color: red;">There are a number of Strategies and plans which explain the planned transport measures for Carrington – and I set out the key ones below:</p> <p style="color: red;">The GM Transport Strategy 2040 sets GM’s long term ambition for transport, including a ‘right mix’ vision for 50% of all journeys in Greater Manchester to be made by walking, cycling and public transport, by 2040.</p> <p style="color: red;">The Transport Strategy 2040 is supported by the Delivery Plan 2021-2026 – this relates to strategic transport schemes across GM. The Delivery Plan identifies the following strategic schemes in the Carrington area:</p> <ul style="list-style-type: none"> • Carrington Relief Road – including sustainable transport measures, such as new / improved bus infrastructure, cycling and walking links along the route and connecting to surrounding areas • Sale West Bus Corridor • New Carrington sustainable transport corridor – scheme which utilises the dis-used rail line through Carrington linking across the Manchester Ship Canal to Irlam. This will initially be an active travel corridor but with long term potential for other sustainable transport modes. • Improvements to the Warrington Railway line – opportunity to provide sustainable transport links to this route at Flixton and Irlam • Metrolink capacity improvements on the Bury – Altrincham line – of benefit to Carrington area via improved bus links to Sale for interchange on to Metrolink <p style="color: red;">The status of the interventions in the Delivery Plan reflect the stage of scheme development and the planning status of the wider New Carrington allocation. Much of the development at New Carrington is dependent on the adoption of Places for Everyone and the build out of the scheme will take place over 15+ years. The transport interventions will therefore need to be phased alongside this.</p> <p style="color: red;">The New Carrington Locality Assessment was prepared to support the PfE New Carrington allocation. This identifies a range of highways and sustainable transport schemes which will be required to support the development, see summary of the sustainable transport measures:</p> <ul style="list-style-type: none"> • Access to Altrincham package – new bus stops and bus access / junction improvements between Carrington and Altrincham • Access to Sale package – new / enhanced bus stops, various bus access junction improvements between Carrington and Sale

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		<ul style="list-style-type: none"> • Carrington to Stretford (via Urmston) corridor – junction improvements, enhanced links and bus facilities at Flixton station • PROW improvements across the site • Cycle and walking links to existing communities at Partington and Sale <p>The transport interventions required to support the New Carrington allocation will continue to be refined through further Masterplanning, as well as future planning applications and associated Transport Assessments. The PfE New Carrington policy (JPA33) also includes a number of requirements relating to sustainable transport measures, including the delivery of a network of safe cycling and walking routes, bus priority infrastructure, improvements to the Trans Pennine Trail and improved east / west public transport links</p>
	<p>Marj Powner Commentary</p>	<p>The key word in my question is “commitments”. As I stated, and as Trafford are fully aware, I have examined all these documents in detail. There is only one commitment and that is to the Carrington Relief Road (CRR), despite the recognised need for sustainable passenger and freight transport options in this area.</p> <p>Other than the CRR, the proposals mentioned by Trafford are not committed, they are subject to business cases (within the next 5 years) and the availability of developer contributions. I am aware that developers will be expected to provide significant sums to fund the CRR (see <u>Executive Committee Report</u> starting page 443 - 25th July 2022). This reduces the potential for the schemes set out above to be delivered.</p> <p>Regarding the New Carrington sustainable transport corridor (known as the Trafford Greenway) linking Irlam to Altrincham along the former Cheshire Lines rail alignment, despite Trafford’s comment in their response above, there is no mention in the Delivery Plan that there will be future consideration of any other sustainable transport modes for this route.</p> <p>Trafford also provides a list of what they call “sustainable transport measures” above but:</p> <ul style="list-style-type: none"> • these are not commitments • there are no sustainable freight transport options, which is a necessity given Trafford’s continuous approval of rising numbers of industrial and warehousing businesses in the area, significantly increasing the number of HGVs on local roads <p>Trafford also mentions the two potential proposals (Improvements to the Warrington Railway Line and Metrolink capacity improvements) which do not directly benefit residents in this area. We would have to either be very fit and cycle/walk to them, or we would need access to reliable, affordable and frequent bus services (we have been promised improved bus services since 2006 and in fact our bus services have depleted further since then). Given Trafford has acknowledged that this area is poorly served by public transport, this should have been addressed as a priority and should be a commitment in the Delivery Plan.</p>

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		<p>It is very strange indeed, that, in planning to develop the largest housing allocation (4,300 homes) in the Greater Manchester Spatial Framework (now known as Places for Everyone) and one of the largest employment development sites (350,000 m²), Trafford has secured no commitment to any sustainable passenger or freight transport services for this area.</p> <p>Trafford suggests that <i>“Much of the development at New Carrington is dependent on the adoption of Places for Everyone and the build out of the scheme will take place over 15+ years”</i>. As I have pointed out in my complaint previously, this suggests that there is still sufficient time to develop sustainable passenger and freight transport options rather than just focus on a new road.</p> <p>To further demonstrate the inadequacy of the current approach, paragraph 3.6 on page 303 of the <u>GM Transport Delivery Plan 2040</u> states that <i>“Parts of Trafford are currently poorly served by public transport; this includes areas such as Carrington, Partington and Sale West. GM wide bus reform measures could potentially improve the frequency of services to these areas, providing improved connections to surrounding town centres and employment locations. Proposals for the Trafford Greenway are currently being developed linking Altrincham, Carrington and Partington, as well as an opportunity to cross the Manchester Ship Canal to Irlam. This would provide a significant benefit to Partington with the potential for a cycle link from Partington to Irlam station from where people can travel by train to the Regional Centre.”</i></p> <p>Firstly, given they acknowledge the area is poorly served by public transport, there is no reasonable explanation in their response about why sustainable transport has not been prioritised above the construction of a new road.</p> <p>Trafford should have been developing sustainable passenger and freight transport options since they highlighted these in their 2006 Unitary Development Plan and repeated the necessity for these in their 2012 Core Strategy.</p> <p>Secondly, to suggest that it is sufficient for the people of Partington to be provided with a cycle link to a train station is shameful. If P4E is approved, the number of households in Partington will grow by over 3,000 (from the current c3,500 households), almost doubling the town in size. Given the level of planned development, sustainable passenger transport services should have been prioritised, especially as there is a former railway line running right through Partington!</p> <p>Thirdly, having checked with the Parish Councils, it seems residents are not involved in the development of the Trafford Greenway proposals!</p> <p>Finally on this issue, paragraph 3.9 (page 304) of the <u>GM Transport Delivery Plan 2040</u> states that <i>“A key issue is discouraging people from driving their children to school.”</i> Residents have ideas (such as cycling buses) but do not have a forum to input them nor has there been any consultation through which we could share them, nor is there a funding scheme we can bid against to do a pilot (we already have schools and businesses interested).</p>

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		<p>Regarding the statement in the response that “<i>Much of the development at New Carrington is dependent on the adoption of Places for Everyone</i>”, this is confusing as, at the Scrutiny Committee Meeting on 16th March 2022, Trafford’s Officer said, in relation to the P4E New Carrington Allocation, that “<i>as far as this Authority is concerned that is now a formal policy of the Authority</i>”. As with their reports, the written and spoken statements made by Trafford are often conflicting or contradictory.</p>
15	Marj Powner Stage 2 Complaint	<p>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?</p>
	Trafford Stage 2 Response	<p>The Council has consistently received feedback from ward Councillors and past engagements in the area that one of the main problems facing Carrington and especially Partington is the poor transport in the area and the lack of accessibility. Indeed this was a recurring theme of the recent engagement on the Trafford design Guide in Partington on 2 July.</p> <p>Consequently whilst better transport is needed to serve new developments planned under the Core strategy and PFE, it is also needed to end the historic isolation of Carrington and Partington which are largely divorced from the rest of Trafford – which is further hampered by congestion on the A6144. As I set out above the proposed Link road forms part of a wider package of improvements – but as I explain elsewhere it is also important for ensuring better Bus and cycling links.</p> <p>Residents in Carrington Village have also long complained about the impact of heavy traffic close to their homes. Unfortunately it will not be possible to close the existing A6144 altogether because of the number of existing homes and businesses along the route – but the Council’s intention is that it is very heavily calmed so that it becomes unattractive to through traffic and remaining vehicle speeds are further reduced. In future the Relief Road will be the principal route – and the current A6144 will very much become a secondary road, really intended for local access only. This will mean living conditions along the current route will improve – and should avoid the sort of scenario you describe of an island of housing surrounded by busy roads.</p>
	Marj Powner Commentary	<p>It is certainly true that Carrington and Partington have very poor public transport links. As I set out above, none of the components in the wider package of transport improvements (other than the CRR) are commitments and we have been promised public transport improvements for over 15 years.</p>

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		<p>The answer received above confirms that Carrington will become a traffic island in a sea of air, noise and light pollution. If this new road is to go ahead, what residents want is for the existing road to be closed to HGVs and through traffic (except for access). Trafford confirms in their Option Appraisal Report that they expect only 64% of traffic to use the new route. This leaves the existing road still experiencing significant volumes of traffic, which will increase as new businesses and housing are approved in the area.</p> <p>For Partington, the response above once again does not answer my question. I asked for clarity about exactly how the residents of Partington will benefit from the CRR. Because of their location, Partington residents do not understand what the benefits of this road, if any, are for them.</p> <p>Residents do have ideas for reducing traffic during rush hour, which is a particular problem (as with all roads). As an example, if improved (and free to access) school transport was provided, there would be an immediate reduction in the congestion caused at this time. This would not be as expensive for the public purse (especially given the rising costs of the road), would be much less environmentally damaging and would be very positively received by residents. As mentioned above, there is no forum for us to input our ideas, we have not been asked via a consultation process and there is no funding scheme against which we can apply to pilot our ideas ourselves.</p>
16	Marj Powner Stage 2 Complaint	<p>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.</p>
	Trafford Stage 2 Response	<p>The Council has always accepted that major infrastructure has a wider impact – and the Carrington relief Road is no exception. As with all major developments there is a need to balance social, economic and environmental impacts in the public interest. Inevitably there is no single 'silver bullet' which solves transportation issues, without some element of disbenefit.</p> <p>Impact on users of public rights of way and adjacent leisure facilities has been – and continues to be a factor which the road takes account of. One of the purposes of the current round of meetings is to try and better understand how rights of way are used by local people.</p>
	Marj Powner Commentary	<p>To call the impact to resident health and wellbeing a “disbenefit”, to suggest that causing ill-health (or worse) is in the public interest and to reduce this concern to access to PROWs and other leisure facilities is astounding. Residents’ mental and physical health will be severely impacted by the huge increases to air, noise and light pollution caused by the decision to construct this road, rather than consider options for sustainable passenger and freight transport.</p> <p>These plans could be a breach of Article 2 of the Human Rights Act, which states that “<u>Public authorities should also consider your right to life when making decisions that might put you in danger or that affect your life expectancy</u>”) as there is now considerable evidence of the health impacts caused by these pollutants.</p>

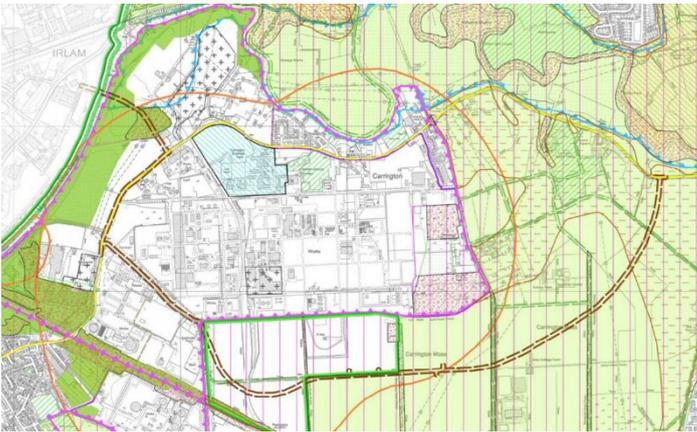
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		<p>Air pollution alone is <u>described by Public Health England</u> as “<i>the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure</i>”. The report goes on to say that there is “<i>strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma</i>”.</p> <p>The impact on health is not new information. The Government’s Committee on the Medical Effects of Air Pollution (COMEAP) has produced a number of reports and guidance, which are set out on the Government’s <u>website</u>. Their latest report (25th July 2022) suggests that toxic emissions (from traffic fumes and other pollutants) are increasing the risk of developing dementia, one of the most devastating degenerative cognitive conditions suffered by human populations. Other reports cover specific medical conditions and, for example, the impact on mortality of long-term exposure to air pollution.</p> <p>It is my understanding that the Local Authority has a duty of care for its residents. Upholding this duty of care means that residents’ health and wellbeing should not be impacted by increased air, noise and light pollution, especially when alternatives are available.</p> <p>I consider Trafford’s response to this question to be thoughtless and ill-considered.</p>
17	Marj Powner Stage 2 Complaint	<p>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 13th 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.</p>
	Trafford Stage 2 Response	<p>I hope there has never been any attempt to diminish or belittle the concerns expressed by local people about the road scheme – and especially any route which crossed agricultural land. This is why we have pursued the alternative route of following the existing alignment of the A6144 – which avoided the area of greatest local concern. Contrary to what might sometimes be perceived, this route was a genuine and credible option – and one which the Council was keen to make work. Consequently It is very unfortunate if any impression has been given that local concerns were not being taken seriously – because that is not at all the case.</p>
	Marj Powner Commentary	<p>One of the comments made by a Councillor at <u>Trafford’s Scrutiny Committee</u> (12th January 2022) was that “<i>the vast, vast majority of the people who completed that petition do not live in Partington or Carrington and they are the people who are going to be most affected by this</i>”.</p> <p>This is incorrect and no attempt was made to correct this statement at the meeting. It should be noted that, given the planned location of the route, the people who are going to be most negatively affected are those who live in Sale West and those who use the Moss, including the professional athletes and children who play and train on the sports grounds there and the SEN children who receive provision delivered by Carrington Riding Centre.</p>

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No.	Author	Detail
18	Marj Powner Stage 2 Complaint	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 <i>“to reflect up-to-date information concerning the anticipated cost of a road link required to the Location”</i> . I have requested the information associated with this update via an FOI request. I think this clarifies that the cost was not under-estimated 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 <i>“inflationary pressures”</i> it is unlikely that a road estimated to cost £3m in 2010 would become £34m (or possibly even £60m) in 2022.
	Trafford Stage 2 Response	<p style="color: red;">I was not present at the Trafford EIP but I regret the information before the Examination cannot possibly be correct – and regrettably the Inspector must have been misinformed. There is no possible way that a new road would have cost £3m even in 2010.</p> <p style="color: red;">As an example the 4.8Km Alderley Edge bypass opened in 2010 – this is a single carriageway road with two cycleways on either side. It cost a reported £52M – just over £10M per kilometre. I appreciate that the highway improvement at Carrington could be built to a lesser specification – and the Alderley Edge example includes a rail crossing which will have inflated the figure – however even allowing for those differences I hope you can see that £3M would not have been sufficient for anything more than some minor improvements and certainly not “New road infrastructure to serve the development area to relieve congestion on the existing A6144” as required by the Core strategy.</p>
	Marj Powner Commentary	I totally accept that this cost figure could be an error and have raised a further FOI with the Planning Inspectorate to clarify why the cost of this road was reduced to £3m. It should be noted, though, that the cost of £3m was a specific correction made by the Planning Inspector. The information available in the Core Strategy about the road (which is described as a “link road to the development site” is extremely limited.
19	Marj Powner Stage 2 Complaint	<p>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:</p> <ul style="list-style-type: none"> • 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.

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No.	Author	Detail
		<ul style="list-style-type: none"> 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.
	<p>Trafford Stage 2 Response</p>	<p>I fully acknowledge that the detail of the Core Strategy Proposal was never worked through as originally envisaged into a new development Plan. My understanding is that a site allocations plan was due to be prepared to sit beneath the Core strategy and that there would be an area Action Plan for Carrington. Neither were progressed because of changes to the planning system at a National level (Notably the new NPPF) which rendered the previous Core Strategy 'out of date' in certain key respects, most especially around housing provision.</p> <p>Therefore I agree that the Core Strategy doesn't define where a road improvement should go – as this was clearly devolved to a subsequent plan. We do however get a sense of the thinking on the subject from the indicative route as shown by the 'Other highway Improvements' displayed on the Composite Policies map. You will note that this alignment runs to the south of the current preferred route – and would have been much more extensive in its impacts.</p>  <p>Ultimately the merits of the preferred route will be determined via a planning application and not the development plan. That application will need to address not only the transport efficacy of the chosen route – but also its environmental impacts, including any impact on areas of agricultural or biodiversity importance.</p>
	<p>Marj Powner Commentary</p>	<p>I think this confirms my assertion that the 2012 Core Strategy (CS) was not a document that can be considered as “early stage” consultation with residents.</p>

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No.	Author	Detail
		<p>The Composite Policies Map appears to be a separate document from the CS and it is not clear whether the few people (see question 24) who responded to the CS had seen it.</p> <p>What is clear is that there was insufficient information in that CS for residents to give “intelligent consideration” to the proposals, as required by the Gunning Principles.</p> <p>Trafford Supplementary Planning documents https://www.trafford.gov.uk/planning/strategic-planning/Supplementary-Guidance/supplementary-planning-documents.aspx SPD 1 Planning Obligations February 2012 See page 48</p> <p>It is also clear that there remains confusion about what was proposed in 2012 as it is my understanding that the graphic included in the response above was known at the time as the Carrington Bypass. The costs shown are :</p> <p>Road £16m (Phase 1) Bridge £15m (Phase 2)</p>
20	Marj Powner Stage 2 Complaint	<p>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 “<i>projects</i>” 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.</p>
	Trafford Stage 2 Response	<p>The best way in which public transport can be improved for residents in the area is by better and more efficient buses. Whilst occasionally attention on public transport is often focussed on trams and trains – it is buses that can make the real difference, because of the flexibility and frequency they can offer – alongside their significantly more limited infrastructure implications.</p>

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		<p>As you will know Bus Reform is now proceeding in Greater Manchester – and this will bring with it the prospect of zonal ticketing, integrated with metrolink and hire bikes – and the regulation of routes and frequencies. At present bus services are limited in the area – but they are also slow – caught up in the same congestion as the rest of the traffic. If this picture is to change, then highway improvements need to be implemented. With this in mind the Carrington Relief Road will feature bus priority features to try and speed up route reliability. This approach would have been followed for both proposed alignments – so I am not suggesting it is in some way a benefit of the route as finally chosen – but it is most definitely a benefit of the road project as a whole.</p> <p>As regards public transport the Council also supports the re-opening of the Rail line either as a green route, bus way or full railway line. In 2020 a bid was submitted to the re-opening railways fund – and the Council has fought hard to ensure that the line features within the Transport 2040 Strategy. In the short term there is also the possibility of a cycle route across the Cadishead viaduct, linking to rail links in Salford.</p>
	Marj Powner Commentary	<p>It is encouraging to hear that Trafford made a bid to the re-opening railways fund. I have requested a copy of this document.</p> <p>Regarding the other comments in this response, there are no commitments to public transport improvements for this area (this is confirmed in the response to an FOI request, attached).</p> <p>The Transport Strategy 2040 seems to only mention the route as a cycleway, there is no mention of future opportunities to re-open the railway line.</p> <p>I strongly believe, as do other residents, that re-opening this line should be a much higher priority than the road as it will sustainably deliver more benefits, to a wider set of communities in this area.</p>
21	Marj Powner Stage 2 Complaint	<p>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.</p> <p>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.</p>

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No.	Author	Detail
		<p>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.</p>
	<p>Trafford Stage 2 Response</p>	<p style="color: red;">According to the DFT 79% of Freight was moved by Road in 2019 – and this measure is by weight. Given that water and rail are best suited to bulk materials (e.g aggregate) these figures will if anything over emphasise the proportion of goods delivered by none road transport.</p> <p style="color: red;">For an employment site such as Carrington there is unfortunately no realistic alternative to moving goods other than by road. There is no railway line to the area (this was closed in the mid 1980’s) and whilst it is a long term aim of both the Council and TFGM to see that line restored in some form, this is many years off. There is no means of serving the businesses at Carrington by light or heavy rail – and National or Local Planning Policies do not allow the Council to refuse development on the basis that it is not served by rail. Were we to insist on businesses having a rail freight connection (which I stress we are not) this would mean that economic development would be stifled for ten, twenty or thirty years until railway line was restored. There is no Government support for taking a stance such as this.</p> <p style="color: red;">Similarly as regards water transport, this is not suitable for all types of goods – it is ideal for heavy bulk materials – but there is no network of inland commercial waterways as there was a hundred years ago to distribute finished goods across the country. There is an opportunity for the ship canal to serve Carrington – but currently all of the effort of The Manchester Ship canal company is focussed on developing Port Salford. The Council is very supportive of these proposals – and if successful, it is hoped it will spawn other connections along the canal. However at present there is no prospect of any such port in and around Carrington – and even if there was – that could not assist a company who needed to move goods to inland destination.</p> <p style="color: red;">I hope these issues serve to illustrate a wider point – that business at present is dependent on road transport – and that if that is to change it needs radical and concerted action at a national level.</p>
	<p>Marj Powner Commentary</p>	<p style="color: green;">I can only conclude, given the lack of response to the first part of my question, that there is no evidence that any developer has contributed to any sustainable passenger or freight transport, nor to any active travel investment.</p> <p style="color: green;">Whilst I welcome the clarification about freight transport in this response, I think it has been over-simplified (I have done my research too).</p>

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		<p>Trafford proposed the extensive regeneration of Carrington in the 2012 Core Strategy. It is now 2022, and, whilst lots of businesses (that put increasing numbers of HGVs on local roads) have had approval, there has been insufficient effort to consider options other than the road. To say rail improvements are many years away, is unacceptable when very little work has been done to incorporate this sustainable option into the regeneration plans since 2012 (or even 2006).</p> <p>In addition, the P4E development plan for the area is a 16 year plan and, as Trafford confirm in their response to question 14 above, the development and associated transport interventions will be phased over this period. This suggests that, if rail transport was prioritised there could be the opportunity to serve businesses, as well as passengers, more sustainably in the coming years. The road is not going to be available tomorrow and may be subject to significant delays to its timetable so to suggest this is the better option is not credible.</p> <p>I suggest that, with the “will” to plan for sustainable solutions, rail could be achieved alongside a number of community ideas to reduce traffic on local roads, this would result in less congestion in rush hour, and less air, noise and light pollution.</p> <p>With reference to water-based transport, Trafford suggests (page 111 of P4E document 07.01.25) that the New Carrington location meets Criterion 2 of the Site Selection criteria because the area is close to Port Salford. This is correct, but only if you are looking at a map showing how the crow flies. Nevertheless, it has been used as a way of justifying the level of employment development at New Carrington. Trafford’s response seems to suggest that there are no prospects during the plan period for the area to benefit from that proximity.</p> <p>The New Carrington development is expected to be approved on the basis that will be a sustainable location. How is this possible if there are no sustainable passenger or freight transport options planned or in place?</p>
22	Marj Powner Stage 2 Complaint	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.
	Trafford Stage 2 Response	<p>The Council sees a benefit in a link through to Port Salford for all of the reasons mentioned above – however this does not obviate the need for better transport infrastructure between Partington / Carrington and the rest of Trafford. The Priority of the Council has been to secure this improvement – and unfortunately it does not have sufficient capacity or resources to progress two major projects in parallel. As a consequence the link across the ship canal will need to await the completion of more immediate transport improvements.</p>

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	Marj Powner Commentary	The bridge crossing the Manchester Ship Canal would be the preference of local residents because it takes traffic away from the local area and directly onto a major road (A57). Given the bridge crossing was mentioned in the 2012 Core Strategy and the 2006 UDP, why has there been no consultation to allow residents to express a preference of route options if there is a resourcing issue? As mentioned above, many residents do not believe Partington will benefit from this road, Carrington will become an island in a sea of air, noise and light pollution and residents of Sale West will suffer from a significant increase in air, noise and light pollution.
23	Marj Powner Stage 2 Complaint	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.
	Trafford Stage 2 Response	<p>The Core Strategy provides the context for both the new development at Carrington and the planned infrastructure improvements. As such – the informal and formal consultation connected to a statutory development plan – alongside the scrutiny that is attendant with a development plan examination is important to establishing the basis for the road and related works. It is evident that the concept of significant new development, alongside supporting transport infrastructure was set out clearly within the Core Strategy. That does not mean that consultation in any way ends at that point – but it should be recognised that the road and related new development have all have the baseline of having passed through the development plan process.</p> <p>I agree that it is reasonable to consider after the passage of time whether development or projects are still appropriate. However the Core Strategy remains part of the Council’s development plan and developments arising from it have continued to come forward – the transport assessments associated with these developments and the advice of the Council as a highway and transport authority is that these developments need to be accompanied by highway infrastructure improvements.</p>
	Marj Powner Commentary	As mentioned above, were a number of transport components for this area included within the Core Strategy 2012 (so all those components have the baseline of having passed through the development plan process, not just the road). Given that Trafford are now suggesting that not all of these components can be delivered due to resource constraints, they are confirming that they have arbitrarily determined which of those components should be taken forward without giving local residents the opportunity to select the transport options they would like to see progressed.

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		<p>The size and scale of the planned developments in this area (4,300 homes, 350,000 m2 employment space and, in fact, 4 major new roads, all to be constructed across a peat moss, Grade 2 bmv agricultural land, wetland and woodland) should have instigated significant consultation with local residents. Yet, despite Trafford being able to work with landowners and developers (as mentioned in the New Carrington Masterplan), there has been no consultation or input from residents.</p> <p>In addition, as I mention in my question, during the period since the publication of this development plan, Trafford has declared a climate emergency and has set carbon neutral goals. These events should have triggered a review of the plans and a further consultation with residents.</p> <p>There is very little support from residents for Trafford's plans from this area as can be seen from the Consultation graphic attached.</p>
24	Marj Powner Stage 2 Complaint	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).
	Trafford Stage 2 Response	<p style="color: red;">The Council does not accept that the consultation was poor – and had that been the case, the Plan would not have passed examination. Part of the function of the Examination would be to test whether the plan was properly prepared and adequately consulted on. The Fact is that the plan was adopted and remains part of the statutory development plan for Trafford.</p>
	Marj Powner Commentary	I think it is obvious that consultation is poor when, out of an adult population of over 175,000 less than 50 people (some of whom represented businesses, others were Councillors) responded to both consultations on such an important topic. As mentioned earlier in this document, I have lived in Trafford for over 37 years. I am very active in my local community, yet I had no visibility of this development plan.
25	Marj Powner Stage 2 Complaint	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.
	Trafford Stage 2 Response	<p style="color: red;">The Council does not accept that the route options were incorrectly or improperly arrived at. It is understood that some will oppose the chosen Route F, but there were sound reasons for ultimately favouring that alignment. That is not at all to suggest that it is without its impacts or dis-benefits – simply that on balance it is the preferable option. The core principle of the Scrutiny Committee is that its members select which topics they would like to consider. Consequently Carrington transport matters appear at this committee when requested.</p>

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No.	Author	Detail
		<p>The work of the Committee was affected by Covid – but now its normal programme it is anticipated that the Committee will be closely interested in this topic. It is possible that a further report will be considered in the autumn.</p>
	<p>Marj Powner Commentary</p>	<p>According to the Local Government Association, consultation is only legitimate when the following (Gunning) principles are met:</p> <ul style="list-style-type: none"> • Proposals are still at a formative stage (a final decision has not been made or predetermined by the decision makers) • There is sufficient information to give “intelligent consideration” (the information provided must relate to the consultation and must be available, accessible and easily interpretable for consultees to provide an informed response) • There is adequate time for consideration and responses (there must be sufficient opportunity for consultees to participate in the consultation, there is no set timeframe for consultation, despite the widely accepted twelve week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation) • “conscientious consideration” must be given to the consultation responses before a decision is made (decision makers should be able to provide evidence that they took consultation responses into account) <p>Given the sensitivity of the decision, it is shameful that Trafford did not consider it necessary to meet these requirements.</p>
<p>26</p>	<p>Marj Powner Stage 2 Complaint</p>	<p>It is clear from the above that the CRR is NOT a requirement borne out of facilitation of “<i>development from the adopted Core Strategy</i>”. 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.</p>
	<p>Trafford Stage 2 Response</p>	<p>It is true to say that originally the Road was going to be developed primarily by the main landowner – Himor (now Wain Estates) – and I understand that early documentation was prepared very closely with the company. However despite its conception in 2012 limited progress was made – and so in recent years the Council has taken on leadership of the project whilst still working with partners. This partly reflects the wider public interest in the project and the fact that it is not just Wain Estates who will benefit from it.</p> <p>I cannot agree with the statement that the road is not linked to the Core Strategy – the redevelopment of Carrington following the very significant scaling back of petro- chemical operations lies at the heart of Core Strategy Policy. There are several developments arising from the redevelopment of brownfield sites in the locality which are subject to restrictive ‘grampian’ style conditions – because they cannot proceed without transport improvements, notably the new Road and its connected facilities.</p>

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No.	Author	Detail
	Marj Powner Commentary	<p>As stated in my complaint, Trafford has confirmed that the road, and its alignment, has been agreed with the main landowner, without any consultation with local residents. This has been a flawed process which needs to be corrected, putting residents at the heart of decision-making.</p> <p>Further evidence of the predetermined decision, along with Trafford's absolute accommodation of landowner requirements can be found in the documentation associated with <u>Trafford Planning Committee Meeting of 5th March 2020</u>. In relation to Planning Application 99245/OUT/19 – the <u>Committee Report</u> states (paragraph 80) that <i>"The applicant has confirmed agreement to make a contribution of £236,890 and a further contribution of £500,000 would be made providing design work on the Carrington Relief Road progresses beyond the next funding gateway for the scheme. Should the design work on the Carrington Relief Road not progress beyond this gateway, then the £500,000 would not be available as a contribution, and there would be a significant shortfall in the funding for primary school places generated by the scheme. However, in this scenario, the applicant has made it clear that they would not implement this scheme but would build out the schemes approved under planning permissions 88439/HYB/16 and 88779/OUT/16 (the original Carrington Village and Common Lane permissions), and which have no education contribution associated with them."</i> The <u>Minutes</u> of the meeting confirm agreement with that paragraph.</p> <p>In addition, the Chair of the Planning Committee states (54 minutes 48) that <i>"With all the good will (and I know many people in the audience do not support it) that A1 road will happen and there will be £720k going to primary education"</i>.</p> <p>In addition, concerns were raised by Transport for Greater Manchester in the documentation (paragraph 103) that <i>"there is no provision for substantial improvements to public transport, despite this being a requirement of the Core Strategy"</i>. TfGM goes on to say that <i>"the choice of public transport services on offer are unlikely to significantly reduce the amount of car travel generated by this development"</i>.</p> <p>It seems Trafford can choose when it decides to adhere to the Core Strategy policies and when it does not!</p> <p>The plan continuation bias I mentioned in my complaint can be rectified by consideration of more sustainable transport options as alternatives to the new road.</p> <p>Another issue that should be mentioned is the consideration of Control of Major Accident Hazards (<u>COMAH</u>) zones which are monitored by the Health and Safety Executive. The brownfield area highlighted by Trafford in their response contains a number of hazardous installations and there are several more in very close proximity. Some of these businesses are assessed by the HSE as in the Upper Tier of hazard, so Trafford should be seeking transport solutions that would allow for very rapid evacuation in the event of an incident, a disaster or an emergency arising. The road would very quickly become congested and is not the answer.</p> <p>Given there is a plan to increase the population (of both residents and employees) in an area that may have to be evacuated very quickly, a disaster plan involving train and bus transport would be much more effective than one that just relied on people jumping into their cars!</p>

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27	Marj Powner Stage 2 Complaint	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.
	Trafford Stage 2 Response	<p style="color: red;">Places For Everyone largely assumes that the CRR is in Place – and will require fresh transport infrastructure over and above what is being planned now. The 2040 transport Strategy that runs alongside PFE already includes an element of future adjustment in transportation – in other words acknowledging that over the next 20 years technology and behaviours will change to create a different transport landscape from the one we see now.</p> <p style="color: red;">However none of that is sufficient to avoid the need for some road improvements now, if developments planned either by the Core strategy or PFE are to come to fruition. When we met I commented that if the infrastructure that existed in this area 100 years ago remained to this day – that quite possibly the need for a road could be avoided – and that the network of railways, tramlines and canal wharves could met the transport needs of the area. Sadly all of these were dismantled in the 20th Century and so we need to develop transport solutions that are both forward looking and yet reflect the world as we now find it.</p>
	Marj Powner Commentary	<p style="color: green;">If P4E assumes the CRR is in place, this is a breach of Gunning Principles as it confirms the outcome of the Option Appraisal was predetermined.</p> <p style="color: green;">It is helpful for Trafford to acknowledge that what is needed in the area is trains, trams and canal transport. The process Trafford followed should have explored all these options and put them to local residents (in all the impacted areas) to allow their input into the decision – rather than Trafford following the landowner's lead and deciding that the only option available is to construct a new road.</p> <p style="color: green;">Upgrading the existing road and improving the PROWs across Carrington Moss is the better solution for residents, for wildlife and for the climate.</p>
28	Marj Powner Stage 2 Complaint	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.
	Trafford Stage 2 Response	<p style="color: red;">When we met I explained that our plans for closer community involvement were severely scaled back during the pandemic – and that the sort of round table discussion that we had hoped would be the norm, had sadly to be abandoned. As you know we have now resumed a series of face to face discussions with Friends of Carrington Moss and other groups and I very much hope that this sort of regular input and liaison will continue.</p>

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No.	Author	Detail
		<p>Conclusion</p> <p>I recognise that the extent and depth of meetings and liaison has not been as we would have wished this this project over the past two years. But the advent of the pandemic meant that the council had neither the capacity – nor the ability to carry on as before. This is very regrettable but I cannot see how the Council could have acted any differently in the circumstances. We have now demonstrated our intent by picking up this more bespoke engagement once again.</p> <p>As regards the evaluation of Options I cannot stress strongly enough that there was no bias in the consideration of the different routes; there was no reason for the Council to specifically favour Option F from the outset. In contrast Option A appeared to offer a number of benefits – and I have no doubt that had this route emerged as the better choice, then the Council would have adopted it. As the Lead officer for the project I was very keen that we gave the online route the best possible consideration we could – and the consultant team were instructed to be completely objective in their assessment.</p> <p>I appreciate that you strongly oppose the ultimate decision on route options – and I hope that the Council understands and respects the reasons for your concerns. Ultimately however the authority has to make a decision in the public interest based on a balance of a range of considerations – and that it what it has sought to do in this case.</p> <p>I trust my response addresses your concerns, however if you are not satisfied with this Stage 2 response, you may take your complaint to the Local Government and Social Care Ombudsman, contact details for which can be found at: www.lgo.org.uk</p>
	<p>Marj Powner Commentary</p>	<p>The Council could, and should, have acted very differently. It was a choice not to engage with residents and their representatives. Online meetings very quickly became the norm and Trafford did manage to meet with Landowners during this period. As mentioned above, if Trafford had the capacity and ability to fast-track the CRR (and it has moved on apace), they had the capacity and the ability to communicate with residents and their representatives.</p> <p>Furthermore, a key question remains – why didn't Trafford Officers respond to my repeated requests to allow residents to provide input to the Option Appraisal? This input could have been in a variety of formats but not only did Trafford not allow any input, they did not even have the courtesy to respond to my requests.</p>

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Stage 1 Complaint and Associated Response:

No.	Author	Details
1	Marj Powner Stage 1	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.
	Trafford Stage 1 Response	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.
2	Marj Powner Stage 1	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.
	Trafford Stage 1 Response	<p>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.</p> <p>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.</p> <p>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).</p>

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		<p>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.</p> <p>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.</p> <p>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.</p>
	<p>Marj Powner Commentary</p>	<p>Your response did not address the issue I raised about resident requests to provide input to the process. This FOCM blog sets out resident concerns in more detail. For clarity, the second point I made was about the lack of listening to resident contributions. From a Gunning Principles perspective, Trafford did not give conscientious consideration to our feedback that improvements could be made to the design of Option A. We asked how our ideas could be fed into the process. We received no response. You did not provide any justification or reasoning as to why Trafford will not engage with residents to genuinely consider alternatives. This raises the issues of plan continuation bias and the 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.</p> <p>Your response to my second point raises other issues:</p> <p>Suggesting that an indicative route chosen by the developer and then used by the Council, without any public input or consultation, gave it merit as a potential route, without any reference to the safeguards set out in the Core Strategy is weak reasoning.</p> <p>Regarding the initial Outline Business Case Document, FOCM wrote to Trafford's Chief Executive to express our concerns about, among other things, the factual errors and misleading statements the document contained. We expressed our hope that such errors and misleading statements will not continue to be a feature of future documents published by Trafford, but, sadly, this trend has continued up to and including the latest Options Appraisal.</p> <p>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.</p>

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		<p>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 reduce vehicle traffic significantly over the coming months and years. Residents' concerns about the Option Appraisal are highlighted here.</p> <p>In responding to your comments, since Option A is the A6144 and Trafford has no plans to introduce sustainable passenger or freight transport, it is hardly surprising that this route did not deliver benefits of removing traffic from the A6144 but it does not cause the significant environmental issues that Option F creates. Option F does not create active travel or public transport improvements (our FOI request confirms that there are no plans to increase bus services and locating walking and cycling routes right next to a major road is not a healthy, safe or pleasant option). Option A (with active travel routes located on the Moss) certainly provides a much safer option. It is only Trafford's biased version of Option A that introduces risks for active travel users. 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, this is made clear in TfGM's Transport Locality Assessment.</p> <p>In addition to the lack of consideration of the Natural England comments on the environment, there is no mention of the Option F risks to deliverability/timescales caused by resident and other objections and potential legal action given the environmental damage this route will cause.</p> <p>The petition presented to Trafford Council on 13th October 2021 against roads being constructed across Carrington Moss had over 1,600 signatures, collected manually. Of these, over 93% were Trafford residents, the other 7% are people who use the Moss on a regular basis. On such a sensitive issue, it is unreasonable for Trafford to suggest that public consultation will only be carried out on Option F.</p>
3	Marj Powner Stage 1	<p>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 "<i>Can significant harm to wildlife species and habitats be avoided; for example by locating on an alternative site with less harmful impacts?</i>" Trafford does have alternative options that could avoid these harmful effects.</p>

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	<p>Trafford Stage 1 Response</p>	<p>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.</p>
	<p>Marj Powner Commentary</p>	<p>Natural England’s (NE) feedback to Trafford (22nd 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”.</p>
4	<p>Marj Powner Stage 1</p>	<p>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”.</p>
	<p>Trafford Stage 1 Response</p>	<p>Testing compliance with the NPPF 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.</p>
	<p>Marj Powner Commentary</p>	<p>Whilst I agree that no single factor should take primacy, it is clear that there is a huge imbalance within the New Carrington development, with economic factors dominating the social and environmental aspects. Trafford’s documentation, for example, seems to suggest they view sustainability as limited to the design and development of construction projects, how sustainably sourced the materials used will be and how attractive the new neighbourhood will become. This FOCM blog provides an understanding of the wider picture that applies to the New Carrington area.</p>
5	<p>Marj Powner Stage 1</p>	<p>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</p>

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	<p>Trafford Stage 1 Response</p>	<p>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.</p> <p>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.</p> <p>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.</p>
	<p>Marj Powner Commentary</p>	<p>You specifically mention safe cycling. It will be neither safe, healthy or pleasant to cycle, walk or horse ride next to a dual carriageway which is intended to carry huge volumes of HGVs. The alternative option proposed by residents would see walkers, cyclists and horse riders continuing to use the existing routes across Carrington Moss (albeit upgraded), with vehicle traffic continuing to use the existing A6144.</p> <p>There is only one commitment for this area in the GM Transport Strategy 2040 Five Year Delivery Plan and that is the CRR. Trafford has promised residents in Carrington, Partington and Sale West increased bus services since 2006. What has happened is that bus services have been reduced or withdrawn. Our FOI request to TfGM confirmed that there are no commitments to public transport improvements for this area.</p> <p>I have tried to secure the detailed carbon assessment for the CRR via a FOI request, without success.</p>
<p>6</p>	<p>Marj Powner Stage 1</p>	<p>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</p>
	<p>Trafford Stage 1 Response</p>	<p>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.</p>

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		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.
	Marj Powner Commentary	<p>One month further on and I am still awaiting the response to my FOI request for the background papers, including the carbon assessment, that accompany the Options Appraisal.</p> <p>There will be little relief to Carrington Village as Trafford does not plan to close the A6144 to HGVs or through traffic.</p>
7	Marj Powner Stage 1	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
	Trafford Stage 1 Response	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
	Marj Powner Commentary	How can the P4E plan be the approved policy of the Council when the Planning Inspector has not yet approved the Allocation and there has been no updated Local Plan? In addition, as the Carrington Relief Road is included in that plan, this is evidence of a predetermined route decision!
8	Marj Powner Stage 1	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)
	Trafford Stage 1 Response	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.

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	Marj Powner Commentary	<p>As you will be well aware, Trafford are at the end of the bus reform timetable but in any event, creating routes for buses does not mean increased bus services.</p> <p>There are no commitments in P4E or the Transport Strategy 2040, other than the CRR!</p> <p>What changes to National Policy for sustainable freight transport?</p>
9	Marj Powner Stage 1	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
	Trafford Stage 1 Response	<p>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.</p> <p>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.</p> <p>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.</p>
	Marj Powner Commentary	<p>Whilst designing facilities for public transport does not actually provide or increase services, I do welcome the planned expenditure of up to £1.4m on creating facilities for active travel, public transport and traffic calming. This would represent a much better return on investment than a very expensive new road, especially given the enormous environmental and social impacts of both initiatives (the first being very positive, the new road being extremely negative).</p> <p>You do not explain how the Right Mix (zero net growth in motor vehicle traffic in GM between 2017 and 2040) will be achieved</p> <p>Please explain why National Policy is restricting Trafford's ability to secure sustainable freight options? I will raise this with my MP. Residents have identified a number of sustainable freight options that could be chosen so what is the problem?</p>

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		<p>No-one is suggesting that the road network should be ignored and it is disingenuous to suggest that is what this question is raising.</p> <p>Please confirm exactly how the residents of Partington will benefit from the CRR as our members who live there cannot understand this statement.</p>
10	Marj Powner Stage 1	A predetermined solution was identified prior to any public consultation (contrary to the Gunning Principles)
	Trafford Stage 1 Response	<p>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.</p>
	Marj Powner Commentary	<p>Why then did P4E include Option F but not Option A?</p> <p>Why was Option A presented in such a biased way?</p> <p>Why were residents' requests to provide input to the Option A proposal to make it a more reasonable solution ignored?</p>
11	Marj Powner Stage 1	No conscientious consideration has been given to resident feedback in relation to the CRR (contrary to the Gunning Principles)
	Trafford Stage 1 Response	<p>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.</p>
	Marj Powner Commentary	<p>Appendix 3 omitted 21 of the 23 points raised in the feedback from resident representatives and did not include mention of the Natural England feedback.</p> <p>See below- you do not explain why you did not give conscientious consideration to our feedback.</p>
12	Marj Powner Stage 1	No consultation has been held with residents, yet a preferred option has been selected (contrary to the Gunning Principles)
	Trafford Stage 1 Response	<p>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.</p> <p>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.</p>

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	Marj Powner Commentary	The Executive Report, considered in September 2021, does not include the majority of the questions raised by the Friends of Carrington Moss and the Parish Councils (21 out of 23). The “public engagement” exercise was not a consultation, it was not presented on Trafford’s consultation portal and did not ask any questions of residents, it merely asked residents to raise any questions they had about the Options Appraisal. You do not explain why the majority of those questions were not included.
13	Marj Powner Stage 1	The CRR route selection decision has not followed the guidance within Trafford’s Statement of Community Involvement
	Trafford Stage 1 Response	<p>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.</p> <p>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.</p> <p>The formal planning application stage for the Carrington Relief Road will need to be in accordance with the SCI.</p>
	Marj Powner Commentary	You state 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 only a very small number of residents were engaged in the Core Strategy consultation. In addition, since that consultation, Trafford has declared a climate emergency and has created a carbon neutral action plan. Both of these documents suggest the need to revisit a 10 year old plan!
14	Marj Powner Stage 1	The public engagement has not followed the approach set out in Trafford’s CRR Options Consultation Report (dated 18th December 2020)
	Trafford Stage 1 Response	
	Marj Powner Commentary	You did not explain why the public engagement did not follow the approach set out in Trafford’s CRR Options Consultation Report (dated 18th December 2020)
15	Marj Powner Stage 1	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
	Trafford Stage 1 Response	The current preferred route will be subject to further statutory consultation through the planning application process and will also benefit from pre-application consultation.

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		<p>Feedback from residents was considered as part of the Executive report which set out the route options to be considered.</p>
	<p>Marj Powner Commentary</p>	<p>Please explain why the majority of the questions raised by the Friends of Carrington Moss and the Parish Councils (21 of 23) were not included in the summary of the Executive Report?</p> <p>Please explain why our request to give input to provide improvements to the design of Option A was ignored?</p> <p>Please explain why our requests for workshops have been repeatedly ignored by Trafford Officers?</p>
16	<p>Marj Powner Stage 1</p>	<p>There has been NO Assessment of the Natural Capital Value of the options</p>
	<p>Trafford Stage 1 Response</p>	<p>The current preferred route will be subject to further statutory consultation through the planning application process and will also benefit from pre-application consultation.</p>
	<p>Marj Powner Commentary</p>	<p>The assessment of the Natural Capital Value of the options is not related to the consultation (statutory or otherwise).</p> <p>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 <u>recent research study</u> 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.</p>
17	<p>Marj Powner Stage 1</p>	<p>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</p>
	<p>Trafford Stage 1 Response</p>	<p>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.</p> <p>Accordingly the Council maintains that it is suitable and appropriate for the task of picking a preferred option.</p>

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	Marj Powner Commentary	If the Appraisal document was created according to “professional principles” please provide some feedback about the examples included in the FOCM blog , which included the following example “The document suggests 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” . This is also incorrect for three reasons. Firstly, the A6144 runs from Sale to Warburton, Option F covers only a very short Eastern stretch. Secondly, the document confirms that only 64% of vehicle traffic is expected to use the new route (furthermore, as mentioned above, the Option F route is likely to induce additional traffic from Flixton/Urmston to the A6144 on this stretch of the road). And, thirdly, the document states that the A6144 is expected to have a design speed of 40mph (discussed below)”.
18	Marj Powner Stage 1	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.
	Trafford Stage 1 Response	<p style="color: red;">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.</p> <p style="color: red;">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 under- estimate, 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.</p>
	Marj Powner Commentary	<p style="color: green;">Please provide the background papers to the Core Strategy 2012 which set out the details of the road and how a cost of £3m was determined.</p> <p style="color: green;">The Core Strategy 2012 also included a number of other transport related objectives, none of which have proceeded, except for the CRR</p>
19	Marj Powner Stage 1	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

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	Trafford Stage 1 Response	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.
	Marj Powner Commentary	Paragraph 113 of the NPPF states “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.” How can the impact of this road be assessed if Trafford do not have this information?
20	Marj Powner Stage 1	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
	Trafford Stage 1 Response	The current preferred route will be subject to further statutory consultation through the planning application process and will also benefit from pre-application consultation.
	Marj Powner Commentary	The consultation and engagement approach taken in relation to the CRR is markedly different to that taken for other initiatives in other parts of Trafford, as we highlight in this video .
21	Marj Powner Stage 1	The decision was not reviewed by Scrutiny Committee in advance of approval.
	Trafford Stage 1 Response	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.
	Marj Powner Commentary	Given the recognition that the route option selected would be controversial, it is irrational that Trafford did not consider it appropriate to request a Scrutiny Committee review in advance of formalising the decision. Some of the questions raised by residents were highlighted by Scrutiny Committee members at their recent meetings.