

# Local Government Ombudsman Complaint

## Carrington Relief Road

### Marj Powner 8<sup>th</sup> August 2022

#### Introduction

This complaint sets out the key challenges that I have faced in trying to secure genuine consultation, specifically in relation to Trafford's plans to construct a new road across grade 2 agricultural land, woodland, wetland and peat moss near to my home.

This road was mentioned in the 2019 version of Greater Manchester's Spatial Plan (the latest version of which is currently under examination), but I have now been told that it is being progressed outside of that Plan. The road appears to be being fast-tracked, with the process being compromised by unethical speed and omission. Corners have been cut and it is residents who are affected.

My complaint also highlights the misleading and ambiguous information shared with residents, the lack transparency/availability of requested information, the impact to the environment and concerns about health and wellbeing.

I'd like to highlight that I am a citizen who is very active in my local community, I have set up three Friends groups in the last 10 years and I am currently undertaking the following roles:

- Chair, Friends of Carrington Moss
- Treasurer, Friends of Coppice Library
- Honorary President, Friends of Dainewell Park
- Committee Member, SkillzFC (a local community football club)

I mention this only to demonstrate how heavily involved in local community issues I am. As such believe I should at least be aware of about the plans for my area. Yet, I only found out about the proposals for a huge development on my doorstep because the local landowner put up "Trespassers will...." signage (on public rights of way)! Given the 2016 Greater Manchester Spatial Plan set out a scheme for 11,500 homes and 750,000 m<sup>2</sup> employment floorspace, it is not unreasonable for local residents, who will, of course, be significantly impacted, to expect to be directly informed by letter. This did not happen.

The very poor communication to residents has continued, and despite considerable efforts to engage with Trafford, residents have been unsuccessful in securing any genuine consultation about this road.

The responses to my Stage 1 and Stage 2 complaints to Trafford are attached, along with my commentary. In summary, I believe the process of fast-tracking the Carrington Relief Road has not been done in accordance with [Trafford's Statement of Community Involvement](#) or the [Gunning Principles](#). In addition, it appears that the advice from Natural England (see attached letters) has been ignored, along with Trafford's declaration of a climate emergency.

I have included some background information in this document but would, of course, be happy to be contacted to clarify any specific issues.

#### Key Issues Highlighted in my Complaint

##### Lack of Genuine Consultation

The key issue is the lack of consultation about the Carrington Relief Road, and the difference in the way residents of this part of Trafford have been treated, [compared to those in other parts of the district](#).

- Trafford Officers suggest (including in the [latest Executive Committee Report \(from page 443\)](#), my comments at [this link](#)) that there has been significant consultation and engagement carried out in relation to this road - **this is factually incorrect** – there has been **NO** consultation specifically about the road to date - see my recent [blog](#) which sets out the struggle to secure genuine consultation with Trafford.
- If there had been a consultation, why was it not publicised on Trafford’s [Consultation Portal](#) which covers a range of different community consultations, or on the [Strategic Plan Consultations](#) page, which have their own link. Some consultations are mentioned on both web pages but the **Carrington Relief Road is NOT mentioned on either!**
- Trafford suggests that the early stage consultation for this road happened as part of the Core Strategy 2012 consultation. If so, this would be a breach of the Gunning Principles because there was insufficient information in that document for residents to give intelligent consideration to the issues associated with the construction of a major new road. **It should be noted that the link road was one line on a page in the document, along with other (sustainable) transport options, which have not been progressed.**
- I believe the lack of consultation breaches the guidance in both Trafford’s Statement of Community Involvement and the Gunning Principles in a number of ways and I have set out some examples of these in the Appendices to this document.
- Resident representatives did have **one** online meeting about the road on 8<sup>th</sup> March 2021. This is when [we raised our questions](#) in response to the public engagement exercise (mentioned in point 3 of our stage 2 complaint).

Within our response, I specifically requested the opportunity to feedback our inputs to Option A [upgrading the existing road] - 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 received no reply and the question in my complaint about why there has been no answer has still not been responded to. If Option F [the route across Carrington Moss] was not a predetermined solution, why has Trafford consistently refused to consider residents’ inputs to improve the Option A design or even had the courtesy to respond to our request?

Furthermore, [Appendix 3 Public Engagement Summary](#) (which accompanies the Preferred Option Report) not only **omits 21** of the 23 questions submitted by resident representatives (including Parish Councils) it also **omits the feedback from Natural England**, including their advice that a full Environmental Scoping Report should be produced **in advance** of selecting a preferred route option for the Carrington Relief Road

In addition, Trafford has not responded to the question in my complaint about why the approach taken has not followed what was set out in the Delegated Executive Member Decision Report about the [Carrington Relief Road Options Consultation](#) (18<sup>th</sup> December 2020).

### **Lack of Transparency and Availability of Information**

A further point I am raising in this complaint is the lack of transparency and availability of information. I requested the carbon implications of the New Carrington development (including the Carrington Relief Road- CRR) via an [FOI request](#) on 18<sup>th</sup> August 2021. Trafford eventually responded (14<sup>th</sup> March 2022) that they were unable to provide the information I had requested.

In the meantime, Trafford included calculations about the carbon implications of the CRR in their [CRR Preferred Option Report](#). I raised a further [FOI request](#) (on 11<sup>th</sup> January 2022) for the detailed documentation that supports this report. I am still awaiting a number of the background documents, including the carbon emissions data. I **have not** requested “*additional explanations or analysis*” as suggested in the response to my complaint, I have merely asked for the information that backs up the assertions in the report! Given the report is dated 7<sup>th</sup> August 2021, and has been presented to Committee, this background information should be readily available!

I would like the input data for the carbon calculations 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). As mentioned above, the chosen route will cut across grade 2 agricultural land, woodland, wetland and peat moss, so the carbon implications of the planned change of land use will be significant.

The Government sets out its expectations that Local Transport Plans (LTPs) include Quantifiable Carbon Reductions in their [Transport Decarbonisation Plan](#), which the Government sees as a fundamental part of local transport planning. This document states that “*Going forward, LTPs will also need to set out how local areas will deliver ambitious quantifiable carbon reductions in transport*”. Unless the information I have requested is clearly and transparently available, how will Trafford be able to demonstrate this requirement? In addition, it is highly unlikely that constructing a new road, rather than progressing alternative sustainable transport options, will “*deliver ambitious quantifiable carbon reductions in transport*”!

### **Impact to the Environment**

The impact to the environment appears to have been studiously ignored, along with advice from Natural England. I provide a number of examples in the attachments and appendices to this document.

The issues I raise in my complaint to Trafford (attached) include, in no particular order of importance:

- Ignoring the explicit advice of Natural England (see attached letters)
- Omitting the feedback from Natural England in their reporting to the Executive Committee and the Scrutiny Committee
- Breaches of the principles associated with making environmental assertions (Green Claims Code) see Appendix 5 below.

Trafford states in the Preferred Option Report (page 32) that “the proposed attenuation ponds and landscaping areas along this route will provide opportunity to enhance the ecological habitats in the area”. What Trafford Officers do not make clear is that it will be spending public money decimating existing nature-rich wetland habitats and will then spend more public money creating new, man-made, habitats, which will take decades to generate the same level of ecosystem benefits. I believe the costs associated with such claims should be visible and should be clearly set out in the Committee Reports.

### **Biased, Misleading, Misrepresented or Omitted Information**

I believe the reports published by Trafford Council about the Carrington Relief Road have misrepresented or omitted key information. This includes the report that focuses on the route selection, known as Trafford’s [CRR Preferred Option Report](#) (7<sup>th</sup> August 2021).

Having found **17 points of bias, 14 contradictions, 10 inaccuracies, 19 misleading statements and 23 other issues**, I have published a detailed analysis of that report which is available [here](#).

As mentioned above, [Appendix 3 Public Engagement Summary](#) (which accompanies that report) not only omits 21 of the 23 questions submitted by resident representatives, it also omits the feedback and advice from Natural England.

It is unacceptable that such a [biased and misleading CRR Option Appraisal](#) has been used to determine which route option is the most appropriate, especially given that the decision was known in advance to be contentious.

Furthermore, as set out in the [Executive Committee Report](#) (from page 443), there is a huge gap in the committed funding available for the road, yet there is no clarity about how the funding shortfall will be addressed and how this will impact residents or the services available. It should be noted that the expected costs have increased from £3m in 2012, to c£30m in 2018, to almost £60m in 2022. Given the current market conditions, even the worst-case budget seems very optimistic and the contingency figures seem very low at only 6% (best case), 8% (likely case) and 11% (worst-case) respectively. There is no mention of the contingency set aside to address flooding of local homes, should that risk materialise.

Having two roads, instead of just one, will cost more to maintain, will cause a higher impact to the green belt, and will induce much more through traffic, increasing carbon emissions and air, noise and light pollution in the area, these issues are not mentioned in the report.

The Risk section is also very light on detail, with the document stating that “*The project team is working to a detailed programme of activities which takes into account all activities which are associated with preparing a complex major scheme planning application*”. The document I have received in response to my FOI request, which is available [here](#), is not detailed and does not include all the workstreams one would expect for a programme of this nature.

I am very concerned that Trafford has not demonstrated that this road is viable and deliverable, given the funding issues and risk issues mentioned above.

In the [Executive Committee Report](#) (from page 443), Trafford says (para 8.3) the scheme will be delivered in the context of the GM 2040 Transport Strategy. That Strategy states that the GM Right Mix aim is for **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. A new road is not the right solution to achieve the aims of the GM 2040 Transport Strategy! Despite what is written in that Executive report (see para 1.4 and 1.5), there is **Zero commitment** to public transport improvements in the Transport Delivery Plan, **NO** promotion of sustainable passenger or freight transport and **NO** active travel improvements! Let’s be clear, constructing a road for phantom buses to run on is **NOT** delivering public transport improvements!

The Executive report’s response to Carbon Reduction does not say there will be carbon reduction! There is clear and recognised evidence that [new roads bring new traffic](#) – the carbon implications of this road are huge, not just in terms of the lost opportunities as a consequence of concreting over vegetation-rich area that may include peat, but also in terms of the increased vehicle traffic using this route and, as mentioned above, there are no commitments to sustainable passenger and/or freight transport here! So, suggesting (paragraph 8.4) that this road will bring significant carbon enhancements to the area is pure fantasy and is not substantiated by any available data.

The [CRR Preferred Option Report](#) 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 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?

### **Conflicting Statements and Contradictory Actions**

There have also been numerous conflicting statements and contradictory actions, some of which are set out above. I give some further examples below:

- **Choosing the Preferred Option:** Highlighting just one of many examples in the Preferred Option report, Trafford suggests 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?

- **Places for Everyone (Greater Manchester’s Spatial Framework):** The Places for Everyone 16-year spatial plan (P4E) has not yet been approved by the Planning Inspectors and is subject to the current Examination in Public. Even if it is approved, the 16 year plan period means there is ample time to develop sustainable passenger and freight transport options, alongside upgrading the existing route and improving the PROWs across Carrington Moss.

Despite the current status of P4E, at the Scrutiny Committee Meeting on 16th March 2022, Trafford’s Officer said, in relation to the New Carrington Allocation, that “*as far as this Authority is concerned that is now a formal policy of the Authority*”. How is that possible when the Allocation in P4E is not yet approved and there has been no updated Local Plan?

Trafford’s complaint response (Stage 2, point 14) seems to contradict that, stating “*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*”. Yet, this transport intervention is not being phased in, it is being fast-tracked in advance of P4E approval!

Elsewhere in the complaint response (Stage 2, point 27) Trafford states that “*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*” but, firstly, there are **No commitments** in the Transport Delivery Plan other than the Carrington Relief Road, and, secondly, if the Plan that is currently being examined assumes a road (that is being constructed primarily to address the traffic caused by that unapproved Plan) is already in place, that must amount to a predetermined solution in Gunning terms. In addition, what if the New Carrington Allocation is not approved by the Planning Inspector? Such a decision would mean the road would be unnecessary and public monies are currently being spent needlessly!

- **Core Strategy 2012:** Trafford keeps repeating that the Core Strategy 2012 was the architect of the current plan for the new road. Since that date Trafford has declared a climate emergency (November 2018), following which all major initiatives were to be reviewed to ensure they complied with that decision. There is no evidence that the Carrington Relief Road Plan has been reviewed.

The Core Strategy also included a number of sustainable transport initiatives for this area, **NONE** of which have been progressed, despite that declaration and the time that has elapsed since it was made.

The [Officer Presentation to Trafford’s Scrutiny Committee](#) (16<sup>th</sup> March 2022), states that the “*Carrington Relief Road is a requirement of Trafford Core Strategy (2012)*”. It should be noted that it was one line on a page that said no more than estimating the costs of what was then called a “*link road to the development site*” at £3m, clearly a much less intrusive access road only. These costs were specifically reviewed by the Planning Inspector, so Trafford’s assertion that they are erroneous is not credible.

In the response to my complaint, Trafford agrees that the Core Strategy does not “*define where a road improvement should go – as this was clearly devolved to a subsequent plan*”. In fact, I believe there has been a total misunderstanding by Trafford Officers, in that there was a road (called the Carrington By-pass) which was included in one of Trafford’s early Supplementary Planning Documents, and subsequently removed from the final version. At that time, Trafford was keen to protect the peat moss, the grade 2 agricultural land, the wetland and the woodland areas, as set out in the Core Strategy 2012.

Trafford insists the construction of this road is needed to adhere to the requirements of the Core Strategy 2012. Yet, at [Trafford’s Planning Committee Meeting](#) (5<sup>th</sup> March 2020), a Carrington Planning Application (99245/OUT/19) was discussed. The [Committee Report](#) confirms that concerns were raised by Transport for Greater Manchester (paragraph 103) that “*there is no provision for substantial improvements to public transport, despite this being a requirement of the Core Strategy*”. TfGM goes on to say that “*the choice of public transport services on offer are unlikely to significantly reduce the amount of car travel generated by this development*”.

Despite this, the application was approved. **It seems Trafford can choose when it decides to adhere to the Core Strategy policies and when it does not!**

As an aside, it should be noted that the Core Strategy consultation attracted less than 90 responses (across two consultation events), very few of which were from residents.

- **Compulsory Purchase Orders (CPO):** In the [Executive Committee Report](#) (from page 443) there is reference to required CPOs for the chosen route option (Option F, the route across Carrington Moss). This was a surprise because Trafford's [CRR Preferred Option Report \(POR\)](#) considered that Option A (upgrading the existing road) was undeliverable due to the CPOs required. It should be noted that residents did not believe CPOs were required for that route option but were not given the opportunity to input our suggested improvements (despite repeated requests to do so).

In relation to the CPOs the POR states that “*Negotiating with landowners will add significant risk to the programme and budget and CPO is a complex and lengthy legal process is a last resort option for Trafford*”, continuing “*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.*” Given the latest report requires CPOs, what has changed? Why do these points no longer apply?

In relation to Option F, the POR said “*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*”. Yet, four of the ten CPO sites on the chosen route are owned by HIMOR (now Wain). It is clear that the POR was either badly worded or deliberately misleading!

The Preferred Options Summary in the POR, under the category Land Availability, says “*Both Options A and F will affect the Green Belt, Option F [the route across Carrington Moss] is however more detrimental to the Green Belt as the area will now be severed by two roads as opposed to one if Option A [the existing road] was constructed. However, Option A presents a major issue with the available width being constrained between residential properties which would require demolition of properties, land take of private residential open space and likely requirements for CPO unless the standard of the relief road was significantly reduced through the constrained sections. This 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.*”

This is incorrect and is one of the key facets of bias that were deliberately introduced into the POR (see our [blog](#) for more detail). Option A would need **NO** additional CPOs as **active travel could continue across Carrington Moss had that route been chosen**. This means the road does not need to be widened. The Option A route was deliberately articulated as undeliverable and residents were not afforded the opportunity to input improvements (despite repeated requests).

In addition, the report should have made clear that, in terms of Land Availability, the Option F route would also require some land to be CPOd, which will impact the timescales of the project.

Trafford's response to point 13 (of the Stage 2 complaint) is rather odd, given it is now clear that Option F requires properties to be CPOd, as it states “*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. 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*”. Given Option F does require CPO of land, including 4 sites owned by Wain Estates, this response is just inexplicable!

## Health and Wellbeing

There has been a total lack of consideration for the mental and physical health and wellbeing impact for residents, such as myself, that will be the consequence of the huge increases in air, noise and light pollution caused by the decision to construct this new road, rather than genuinely considering options for sustainable passenger and freight transport solutions, along with upgrading the existing road and improving the existing public rights of way across Carrington Moss.

In [response to the engagement exercise](#) (March 2021), I (and others) requested that the number one objective for the Carrington Relief Road should be protecting the health and wellbeing of existing residents. Not only did this request not make it to the top of the list, it is not even included as an objective at all and residents have had no feedback from Trafford about their list of questions since the document was submitted. It is clear there has been no genuine consideration of resident inputs. There are further examples of this elsewhere in this document.

**In their response to my complaint, Trafford describes the impact to resident health and wellbeing as a “disbenefit” (point 16, Stage 2 response), suggesting that causing ill-health (or worse) is in the public interest and reducing this concern to accessing PROWs and other leisure facilities.**

The Health and Wellbeing implications of this road have been significantly understated. I believe these plans could be a breach of Article 2 of the Human Rights Act, which states that “[Public authorities should also consider your right to life when making decisions that might put you in danger or that affect your life expectancy](#)”) as there is now considerable evidence of the health impacts caused by these pollutants. Some examples of this are below.

Air pollution alone is [described by Public Health England](#) as “*the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure*”. The report goes on to say that there is “*strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma*”.

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 [website](#). Their latest report (25<sup>th</sup> 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.

In fact, recent research results suggest that [even low levels of pollution can damage health!](#)

It is my understanding that the Local Authority has a duty of care for its residents. Can it be considered to be upholding this duty of care when alternatives to this road scheme are available, yet the Authority is pushing ahead with the most damaging (to the environment and public/wildlife health) and unsustainable solution.

The [Executive Committee Report](#) (from page 443) suggests (para 1.1) that “*local residents will have their quality of life improved*”. This is a very disingenuous statement. Which residents do they mean? Not me or my neighbours. Not Carrington residents, who will be surrounded by traffic (on two routes rather than one). Not Partington residents, who get no benefits at all from this route. Not the users of Carrington Moss, who will be massively impacted by those increases in air, noise and light pollution, including the children with Special Education Needs who attend provision delivered by Carrington Riding Centre (which is adjacent to the proposed road route) and some of those children will experience severe issues as a consequence of the noise caused by excessive HGV and other vehicle traffic.

Users of the Moss also include the professionals and children who play and train on the sports grounds (Manchester United, Sale Sharks, Sale Rugby FC), all of which are also close to the proposed road route. The road will also impact the health and wellbeing of the pupils and staff at All Saints Catholic Primary School, along with the residents of Sale West, such as myself (to say nothing of the wildlife and birds that breed and feed on the moss).

Taking up active travel options, as Trafford advocates, will mean using either one or the other of two busy roads. So modal shift is highly unlikely because it will be unsafe, unpleasant and unhealthy to walk, cycle or horse ride right next to a major, toxic, road with hundreds of speeding HGVs and cars travelling along it each hour!

Residents are, rightly, very worried about the risk of flood damage to their homes and the consequent health problems for themselves, their children and their pets. The annual flooding [video](#) that I produce provides some insights about how much water will need to be captured and how large any attenuation ponds will need to be. The Preferred Option Report confirms that Option F requires **2.5 times more water storage** than Option A and, unlike the acknowledged wetland area proposed in Option F, the existing road (Option A) is typically not regularly covered by significant water levels.

Given there are such huge volumes of water stored on Carrington Moss, concreting over these wetlands will put homes and health at enormous risk and this is extremely stressful. In addition, as the area is predominately agricultural land, woodland, wetland and peat moss, there is also a risk of vermin infestations for nearby residents!

### What I am seeking

My request is that Trafford Council are directed to pause their current plans to fast-track the construction of this new road and undertake the following actions:

1. Engage the community in discussions about the full range of transport options, prioritising sustainable passenger and freight transport solutions that could be made available (there are two disused rail lines that come into the area, the site is right next to the Manchester Ship Canal and there are other ideas that residents would like to explore and progress)
2. Once it is agreed that road improvements are needed, which I fully recognise is likely to be the case, whatever the outcome of (1) above, to formally consult local residents about the route of the required road, for example, whether a new road, across grade 2 agricultural land, woodland, wetland and peat moss, is required or whether the existing road (and the footpaths/bridleways across Carrington Moss) should be upgraded. Sufficient formal consultation should be held and should follow the guidance in Trafford's Statement of Community Involvement and the Gunning Principles.
3. That the advice of Natural England should be followed and, as such, a full Environmental Scoping Report should be produced **in advance** of selecting a preferred route option for the Carrington Relief Road.
4. That all information which will support the route option decision is made fully and transparently available to residents, including the comprehensive assessment of the expected carbon emissions and the detailed Environmental Scoping Report.
5. That residents be fully involved in the design of the route, including the placement of crossings for people and wildlife, the location of active travel routes and bridleways, the final route alignment, particularly if there will be an impact to habitats, including trees.

In addition to the actions mentioned above, I would specifically like to have answers to the following questions which Trafford has so far not included in their responses to my complaint:

- I would like Trafford to explicitly explain why there has been no response to resident feedback in March 2021 (and subsequent chasing requests) asking how residents could input their ideas to improve the design of Option A
- I would like to understand why, given Trafford has fast-tracked the CRR through various Committees, and has been able to engage with landowners, the opportunity to facilitate resident requests for workshops was not prioritised (especially as these could have been handled online)

## Local Government Ombudsman Complaint – Carrington Relief Road

- I would like to understand why Trafford did not follow the process set out in their [Carrington Relief Road Options Consultation](#) (18th December 2020) and that set out in the postcard delivered to 10,000 households, which stated that there would be a next phase of engagement, including a “*series of more focused sessions which will answer your questions*” (and please ask them not to use the pandemic as the excuse, if they can fast-track this initiative through the various Committees during this period, they can also engage with their residents)

What I am keen to stress is that there are alternative options which would be much cheaper for the public purse, much less environmentally damaging and much healthier for Trafford residents, so it seems odd, given Trafford’s declaration of a climate emergency and their supposed carbon neutral action plan, that only residents and specialist groups (like the CPRE and the Wildlife Trusts) appear to understand that this land is a crucial component of local climate emergency mitigation measures and there is nowhere else in Trafford where we can:

- restore peat to more effectively capture carbon, so our children and grandchildren can breathe cleaner air
- grow crops and alleviate surface water risks, so our descendants have fresh food, with a low carbon footprint, and residents are not fearful of flooding every time it rains
- increase the populations of red listed birds and endangered wildlife, so we can help nature’s recovery, increase biodiversity and mitigate the impact of climate change.

## Appendix 1: Carrington Relief Road Background

### About Carrington Moss

Carrington Moss is an area of green belt situated between Carrington, Partington, Sale West and Warburton in Trafford. This green space comprises Grade 2, best and most versatile, agricultural land, woodland, wetland and peat moss, along with a number of formal and informal walking, cycling and horse-riding routes. There are over 10 SSSIs, SBIs and conservation areas on and around Carrington Moss. It is the breeding and feeding grounds for over 20 red listed birds and a number of endangered species. It is extensively used by local residents, including myself, for recreational activities, it also hosts the training grounds of Manchester United, Sale Rugby FC and Sale Sharks, with professional athletes and young users of all age groups. There are over 1,000 horses stabled on and around Carrington Moss and one of these organisations (Carrington Riding Centre) is also a college and offers provision to pupils with Special Education Needs, some of whom will be significantly impacted by the increased air, noise and light pollution.

It should be noted that Carrington Moss featured in an academic study completed in 1995 (The Wetlands of Greater Manchester) which confirmed that 325 hectares of peat survived at that time.

### Core Strategy 2012

The plan, to regenerate the brownfield area in Carrington, has been in the making since the [2006 UDP](#), was reinforced in the [2012 Core Strategy](#) and has subsequently been incorporated within the [Places for Everyone](#) Joint Development Plan (mentioned below).

Trafford suggest that the Carrington Relief Road began its journey in the 2012 Core Strategy and it is true to say that there is a line describing “*the Carrington link Road to the development site*”. This was obviously an access road as it was costed at £3m (definitely not the same infrastructure proposal as the current Carrington Relief Road). This cost figure was specifically confirmed by the Planning Inspector at the time of the Examination of the Core Strategy (see attached document 110304 CD12.54.7.pdf). Trafford has provided a graphic which was included in an associated document (Composite Policies Map, shown in response to complaint point 19 in the attached) but I believe that route may be for another road being considered at the time and known as the Carrington Bypass (which is not mentioned in the Core Strategy document), it was included in an early version of a Supplementary Planning Document but then removed from the final version.

The 2012 Core Strategy stated that the alignment of the link road would be published in the Carrington Area Action Plan (a document that was never created). So even those few who did respond to the two consultations were not clear about the route that would be taken.

The Core Strategy (along with the 2006 UDP) also proposed significant public transport improvements (which have not materialised), a bridge across the Manchester Ship Canal from Carrington to Irlam, and sustainable passenger and freight transport solutions, including resurrecting the former railway lines into the area.

It has been over 10 years since the original consultations on the Core Strategy, with no action taken on any of the transport initiatives set out in that document (despite the approval of numerous planning applications that impact the area). The priorities for transport solutions should have been reviewed in the light of Trafford’s declaration of a climate emergency (Nov 2018), especially given the available opportunities to progress sustainable passenger and freight options in this area. Residents should have been fully consulted, including those emerging adults, who would have been too young in 2009/10 (when the Core Strategy consultations were carried out), and who will have to live with a plan they have not yet been consulted on.

Sadly, Trafford has put no focus on sustainable passenger and freight transport. I believe Trafford’s Planning Committee has been negligent in continuing to approve planning applications in this area, **WITHOUT** ensuring Trafford prioritised and secured appropriate sustainable transport options over the last decade.

### Greater Manchester Spatial Framework/Places for Everyone (P4E)

Back in January 2017, I was shocked to discover (as a consequence of a local landowner putting up “trespassers will” signage) that an area of green space near to my home of 37 years would be decimated by the construction of (what is currently proposed to be) 4,300 homes and 350,000 m<sup>2</sup> employment space. The land is currently designated as green belt and its release will be tested in the Examination in Public of the Greater Manchester Spatial Plan (now known as [Places for Everyone](#) – P4E), which began its development in 2014.

The “consultation” about the spatial plan was so poor that local residents, who will be significantly impacted by this development, were not even aware that proposals had been published and did not respond in 2016. At that time the plan was for 11,500 homes and 750,000 m<sup>2</sup> employment space.

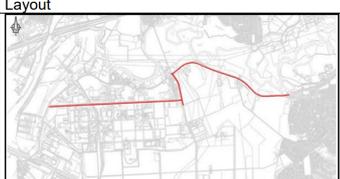
I have subsequently educated myself and now fully understand the plans and their impact. There was a second review of the 150 documents (14,000 pages) in 2019 which local residents, including myself, did respond to. The graphics in the 2019 spatial framework documents do indicate route F (showing that the route option decision taken in 2021 was predetermined).

Whilst I had understood that the Carrington Relief Road was part of the spatial plan and was inherently linked to that 16-year plan being approved, Trafford has now decided to separate it from P4E and it is now fast-tracking the proposal at a much quicker pace, **without any formal consultation**, despite previous assurances to residents that they would be fully involved.

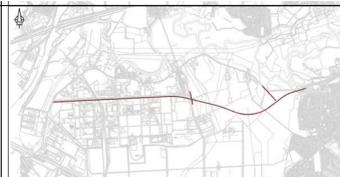
### Carrington Relief Road:

The Carrington Relief Road can be considered to comprise two elements:

- the first is the upgrading of what is known as the A1 road (a private road through an industrial estate) – this upgrade would not be contentious if HGVs and through traffic are prevented from using the existing road, except for access (otherwise Carrington Village will be surrounded by traffic and the consequent air, noise and light pollution) – Trafford is currently **NOT** proposing to restrict access to the existing road.
- the second is the route from Isherwood Road to Banky Lane – this is very contentious because of the two options considered in the Preferred Option Report, Trafford chose Option F, without any consultation and following a [biased and misleading Option Appraisal](#), which specifically **does not** highlight the significant environmental concerns raised by Natural England. The report also does not include the feedback received by Trafford, from resident representatives, such as myself, in response to a very limited public engagement exercise that was undertaken in Spring 2021.
  - Option A: is upgrading the existing major road (Carrington Lane/Manchester Road)

Option	Layout	Description
A		This is an option which uses the full length of the A1 road and explores the opportunity to upgrade the existing A6144 to make the link to Carrington Spur

- Option F: is constructing a new road across Grade 2 best and most versatile agricultural land, woodland, wetland and peat moss

F		This option was originally put forward in funding business cases and makes use of the full A1 and direct link across open fields to Carrington Spur
---	---	---

## Local Government Ombudsman Complaint – Carrington Relief Road

It should be noted that the extract above from Trafford's document confirms that route F was used in the funding business cases, yet again confirming that the decision about the route was predetermined.

The (lack of) consultation does not follow the commitments made in Trafford's Statement of Community Involvement (see Appendix 3) and it does not adhere to the Gunning Principles (see Appendix 4).

Trafford does not seem to understand the difference between consultation and information sharing. They are now claiming that an information sharing event (which they are calling a "public engagement" exercise) was a consultation.

If this was a consultation, why was it not publicised on Trafford's [Consultation Portal](#)? Why were residents not asked explicit questions, such as, for example, "*which route would be your preference*"? There is more information about the "public engagement" exercise in this [blog](#).



The communications campaign Trafford held confirmed that residents were expected to watch a video and raise any questions they had.

Residents were not asked for their views, nor were there any specific questions to respond to and they were specifically advised that this exercise was not related to choosing a route option.

It should be noted that, despite what is said on this postcard, there has been no "*next phase of engagement*" and "*no focused sessions*" to answer our questions.

In addition, 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](#) (18<sup>th</sup> December 2020).

Once I discovered Trafford's plans for the area known as Carrington Moss (the second largest peat moss in Greater Manchester, which is known to have over 325 hectares of remaining peat in 1995), I began asking questions of Trafford Officers and received assurances such as those set out below:

- Email from Trafford's Corporate Director (Place) confirming that Trafford's Statement of Community Involvement "*applies to both planning policy and planning applications and that Trafford is committed to consulting from the earliest stages*" **6th September 2019**
- Email to Trafford in which Community representatives repeated their on-going request to be fully involved in the design of the CRR (29th November 2019). Response by email from Trafford's Director of Growth& Regulatory Services confirming "*I remain committed to the concept that once design work is underway (and before it gets too far) that a meeting needs to be held with local people and community organisations*" **11th December 2019**
- Email from Trafford's Director of Growth& Regulatory Services confirming that "*one of the initial actions is to hold a meeting/workshop with you and any other local groups to discuss local impacts and any related issues. The idea of this is to ensure we have local engagement right at the outset – and so there can be genuine discussion over the approach – rather than presenting people with an almost finished scheme*" **20th February 2020**.

Yet, none of these commitments have materialised.

## Appendix 2: Timeline Summary:

1. [Trafford Executive Summary Outline Business Case for the CRR](#) produced without any notification to or involvement with communities December 2019
2. In the absence of LA involving communities in their discussions, [FOCM arranges two workshops](#) (attended by Trafford Officers, landowners, specialists and community representatives) January 2020
3. [Letter to Trafford Chief Executive](#) 28<sup>th</sup> February 2020
4. [Trafford Planning Committee Meeting](#) 5<sup>th</sup> March 2020  
The discussion about Planning Application 99245/OUT/19 included reference to the Carrington Relief Road. The Chair of the meeting suggested that the road would go ahead (despite there having been no consultation with residents). In addition, the landowner offered Trafford a £500,000 inducement if the road progressed to the next milestone.
5. Email from Councillor James Wright (Executive Lead) stating that “any plans to build a new road, including any road layout, will go through a thorough public consultation exercise prior to any decisions being made” 13<sup>th</sup> May 2020
6. [Response from Trafford CEO](#) 1<sup>st</sup> July 2020
7. [Response to Trafford CEO](#) 14<sup>th</sup> July 2020
8. Our [Community Focused Alternative Transport Strategy](#) sent to Trafford 14<sup>th</sup> September 2020
9. Planning Committee Report [Developer Contributions towards the Carrington Relief Road](#) (which stated – paragraph 1.4 – that the “*Council are currently developing a number of options for the road layout for consultation*” – it should be noted that resident representatives were not able to contribute to the development of this report) 15<sup>th</sup> October 2020
10. [Carrington Relief Road Preliminary Options Appraisal Report](#) October 2020
11. [Carrington Relief Road Options Consultation](#) 18<sup>th</sup> December 2020
12. [Trafford Carrington Relief Road Website](#) February 2021
13. [Public Engagement Video](#) February 2021
14. Email from Marj Powner to the Project Lead requesting clarity about the public engagement exercise as it appeared to be just an information sharing opportunity, not a consultation and was not listed as a consultation on Trafford’s consultation page of their website 25<sup>th</sup> February 2021
15. [Response to Public Engagement Exercise](#) (on behalf of Friends of Carrington Moss, Carrington Parish Council, Partington Parish Council, Positive Partington, Warburton Parish Council, Peak & Northern Footpaths Society) shared at an online meeting and subsequently emailed to various Trafford employees due to the lack of response 8<sup>th</sup> March 2021
16. [Natural England Raise Concerns](#) about the “inaccurate and unbalanced” CRR Option Appraisal 22<sup>nd</sup> March 2021
17. Email from the CRR Project Lead confirming that, for the “one-off sessions, we will look at the responses, speak with the designers and advise the best approach” 25<sup>th</sup> March 2021
18. [Response to the WCHAR Exercise](#) 23<sup>rd</sup> July 2021
19. [FOI Traffic Numbers](#) (Carrington Parish Council) 29<sup>th</sup> July 2021 (response received 11<sup>th</sup> October 2021, confirming the Council does not hold the information)
20. Trafford’s [CRR Preferred Option Report](#) 7<sup>th</sup> August 2021
21. Trafford’s CRR POR [Appendix 3 Public Engagement Summary](#) 7<sup>th</sup> August 2021

## Local Government Ombudsman Complaint – Carrington Relief Road

22. FOI request [carbon emissions implications of the plan](#) for New Carrington, including the Relief Road request made on 18<sup>th</sup> August 2021 (I finally received confirmation from Trafford, on 14<sup>th</sup> March 2022, that they do not hold the information I requested)
23. [Analysis of Trafford's Executive Committee Report](#) 23<sup>rd</sup> September 2021
24. [Trafford Executive Committee CRR Update](#) 27<sup>th</sup> September 2021
25. [FOCM Petition](#) (signed by more than 1,600 local people) against the Roads across Carrington Moss [presented](#) to [Trafford Full Council meeting](#) (13mins 55 sec) 13<sup>th</sup> October 2021
26. FOI request - [supporting reports relating to the Options Appraisal](#) for the Carrington Relief Road – request submitted 11<sup>th</sup> January 2022, 3 reports provided 28<sup>th</sup> February 2022, remaining reports still awaited
27. [Officer Presentation to Trafford's Scrutiny Committee](#) 12<sup>th</sup> January 2022
28. [What was promised for Carrington, Partington and Sale West in the 2012 Core Strategy & the 2006 UDP?](#) 17<sup>th</sup> January 2022
29. [A summary of the New Carrington Allocation and Places for Everyone – is green belt release needed?](#) 27<sup>th</sup> January 2022
30. [A summary of the GM Transport Strategy 2040 – what is promised for the New Carrington area?](#) 12<sup>th</sup> February 2022
31. [Traffic Numbers for New Carrington](#) 18<sup>th</sup> February 2022
32. [Our struggle to secure robust, genuine consultation](#) 27<sup>th</sup> February 2022
33. [Our review of Trafford's biased and misleading CRR Option Appraisal](#) 4<sup>th</sup> March 2022
34. [FOI Request – detailed plan for the CRR](#) requested 8<sup>th</sup> March 2022 (partial response received 18<sup>th</sup> July 2022)
35. [FOCM Presentation sent to all Trafford Councillors](#) 9<sup>th</sup> March 2022
36. [Marj Powner Formal Complaint](#) raised with Trafford 9<sup>th</sup> March 2022
37. [Officer Presentation to Trafford's Scrutiny Committee](#) 16<sup>th</sup> March 2022
38. [Response received to Marj Powner Formal Complaint](#) 22<sup>nd</sup> April 2022
39. [Marj Powner Complaint Escalated to Level 2 Process](#) 3<sup>rd</sup> May 2022
40. Letter from [Natural England to Trafford Planning \(Peat Concerns\)](#) 20<sup>th</sup> June 2022
41. [Analysis of Executive Committee Report](#) 19<sup>th</sup> July 2022
42. Response received to Marj Powner Level 2 Complaint 22<sup>nd</sup> July 2022
43. [Executive Committee Report](#) (from page 443) 25<sup>th</sup> July 2022

### Appendix 3: Trafford’s Statements of Community Involvement

In the latest [Executive Committee Report](#) (from page 443), Trafford suggests that “*There has been significant consultation and engagement carried out as part of getting to the current position*”. **This is factually incorrect** and it should be noted that, contrary to Trafford’s Statement of Community Involvement, there has been **NO** consultation about this road to date.

There are four versions of Trafford’s [Statement of Community Involvement](#) available on the Trafford website.

<a href="#">SCI October 2015</a>	<a href="#">SCI January 2020</a>	<a href="#">SCI September 2020</a>	<a href="#">SCI August 2021</a>
----------------------------------	----------------------------------	------------------------------------	---------------------------------

I have looked at how Trafford’s interaction with residents meets what is suggested in that SCI documentation. Trafford suggests that the Carrington Relief Road has been in their plans since the 2012 Core Strategy. There is no online document sharing their Statement of Community Involvement (SCI) or an equivalent, from that time but one would assume that their consultation approach would be broadly similar to that outlined in the 2015 SCI

There were two consultations for that 2012 document (which I was not aware of at the time, despite my active engagement in the community):

- The first consultation in November 2009 attracted 24 responses (very few from residents)
- The second consultation in March 2010 attracted 44 responses (again very few from residents).

I believe that appropriate engagement with residents would have resulted in many more responses but, despite this appallingly limited feedback (there were well over 200,000 residents living in the district at that time), Trafford consider this consultation to be valid. It should be noted that there were NO specific comments in the consultation responses about the CRR, which would not have been the case had residents been informed about the consultation and if they had been clear about what was being proposed.

**The table below considers some examples of non-compliance with Trafford’s 2015 SCI:**

SCI Content	Experience in the consultation
Paragraph 1.5 (page 5) states that <i>“it is the Council’s intention to promote effective public participation in the planning system. This will make sure that all sections of the community have the opportunity to be actively and continuously involved from the very start of the planning process both in the preparation and subsequent revision of development plans and in significant decisions on planning applications.”</i>	Trafford suggests the formative consultation for the Carrington Relief Road (CRR) was the 2012 Core Strategy, so why were residents unaware of the proposal until notified by the Friends of Carrington Moss? This is evidenced by the very low number of responses to the Greater Manchester Spatial Framework in 2016, which includes the CRR within the New Carrington Allocation. There has been no active or continuous involvement of local residents from Trafford (although there have been discussions with developers).

SCI Content	Experience in the consultation
<p>1.6. (page 5) The aim is that by achieving greater community engagement throughout the planning process our stakeholders and other organisations will have an active involvement in identifying and addressing the main planning issues, and in the development of planning policies and proposals.</p>	<p>Residents have not been engaged in the process. This is evidenced in the <a href="#">Letter to Trafford Chief Executive</a> (28<sup>th</sup> February 2020).</p> <p>The letter refers to the lack of consultation about the Carrington Relief Road. The Options Appraisal document, which I reviewed, was full of errors, misleading statements and huge gaps in the information needed to assess the impact of the planned road.</p>
<p>2.10 (page 9) The following groups will be consulted where appropriate: .....</p> <ul style="list-style-type: none"> <li>• Local organisations - community and voluntary bodies with an interest in Greater Manchester.</li> <li>• Landowners, developers and agents – those who have a direct interest in future development and have a major role to play in providing the facilities and services the district needs.</li> <li>• The general public - those who live in, work in or visit Greater Manchester as well as those who have expressed an interest in the subject matter.</li> </ul>	<p>Whilst landowners, developers and agents appear to have been engaged with extensively (Trafford describe them as major stakeholders in the New Carrington Masterplan page 4), community organisations, residents and the general public have not been involved in the design or development of the plans for the road (or indeed any other transport options) in any meaningful way. There have been no workshops, no involvement and no interaction.</p> <p>Given the huge impact of this road on local communities, including on their mental and physical health and wellbeing, and the recognition that the decision would be controversial, the SCI and the Gunning Principles should have been closely adhered to.</p>
<p>Stakeholder Workshops: 2.47. (page 16) The Council has made extensive use of Stakeholder Workshops in the past to enable interested bodies to discuss planning issues in a detailed and supportive forum. This will continue in the future and will be particularly used at the early stages of plan preparation. A record will be kept of Stakeholder Workshop proceedings.</p>	<p>Despite the recognised impact of this road, Trafford did not arrange any workshops to engage residents and community groups whilst the proposals were at a formative stage (Gunning, point 1). In addition, I have requested a number of workshops, in relation to the Carrington Relief Road, yet Trafford has not responded to my repeated requests for information, responses and/or workshops. The lack of responses has resulted in a number of FOI requests but these do not replace genuine engagement.</p>
<p>Meetings with Partnerships and Communities: 2.48. (page 16) The Council will inform and consult Town &amp; Parish Councils, Neighbourhood Forums, Neighbourhood Partnerships, Town Centre Partnerships, Locality Partnerships, Ward Members and other groups on a regular basis during the production of Local Plan Documents.</p>	<p>There have been no “regular” meetings with Trafford and in fact most of the meetings have been convened at my request. I have very rarely been invited to attend a meeting by Trafford. Unlike developers, residents have not been invited to sit around the table, working in collaboration on the design of the area that most affects them!</p>

### Non-compliance with Trafford’s SCI September 2020

Where my comments on specific clauses would be similar to those in the 2015 SCI, I have not repeated them.

SCI Content	Experience in the Consultation
<p>1.1 (page 3) The planning system in Trafford should be as transparent, accountable and socially inclusive as possible. There should be as many opportunities for successful and meaningful public participation as there can be. Trafford Council wants to have even more effective community involvement, providing opportunities for active participation and discussions with the community as early in the plan-making and planning application processes as possible.</p>	<p>As already stated, there have been no community workshops, no involvement of community representatives in the Option Appraisal, the design of the routes, or the agreement of the key issues to be addressed. I do not believe it is either transparent, accountable or socially inclusive to exclude residents from access to the documentation that has been produced to justify the construction of a road across grade 2 agricultural land, woodland, wetland and peat moss.</p> <p>It should be noted that residents do not feel actively and continuously involved (paragraph 1.4, page 3).</p>
<p>3.1 (page 10) The Council will carry out appropriate consultation during the preparation of plans and supporting documents</p>	<p>It is clear that there are different ideas about what is “appropriate consultation”. The Gunning Principles set out the minimum requirements and we do not believe these have been met for this road (see Appendix 4).</p>
<p>3.11 (page 11) Consideration will be given to requests for Virtual Stakeholder events with groups, organisations, individuals and communities, depending on the type of document and the stage reached in its production. The following types of events will be considered:</p> <p style="padding-left: 40px;">Virtual Workshops .....</p> <p>Working with Partnerships and Communities .....</p>	<p>I have repeatedly requested workshops with Trafford, those requests have been ignored. Our feedback to the public engagement exercise was that residents believe improvements can be made to the design of Option A. I asked how our ideas could be fed into the process but received no response and a decision has now 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.</p>

#### Appendix 4: The Gunning Principles:

The Gunning Principles are a set of “rules” applicable to all public consultation in the UK. They were first proposed in 1985 by Mr Stephen Sedley QC and have been reinforced in successive court judgements, forming a strong legal foundation from which the legitimacy of public consultations is assessed.

The paragraphs below give examples of how the (lack of) consultation to date in relation to the Carrington Relief Road is not compliant with these principles:

Gunning Principle	Why I think the Principle has been breached
<p>Proposals must be at a formative stage, the decision should not have already been made, or been predetermined</p>	<p>The chosen route was included in the 2019 documentation relating to the New Carrington Allocation of the Places for Everyone Joint Development Plan, providing evidence that this was a predetermined decision.</p> <p>The <a href="#">Carrington Relief Road Options Consultation</a> (18<sup>th</sup> December 2020) highlights the options considered and confirms that Option F is the alignment included in all the funding requests. As such, it is the predetermined solution for transport in this area.</p> <p>Furthermore, at a <a href="#">Trafford Planning Committee Meeting</a> (5<sup>th</sup> March 2020), in relation to Planning Application 99245/OUT/19 – the <a href="#">Committee Report</a> states (paragraph 80) that <i>“The applicant has confirmed agreement to make a contribution of £236,890 and a further contribution of <b>£500,000</b> 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></p> <p>This suggests, not only that the route was predetermined with the developer but also that the Planning Committee was aligned with the developer’s request. The <a href="#">Minutes</a> of the meeting confirm agreement with that paragraph above.</p> <p>In the recording of the meeting, the Chair (at 54:48) states 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, Trafford has already approved housing developments and junction improvements on Isherwood Road, Carrington, which suggests that the Option F route is predetermined and that there was an assumption that Option F would be chosen.</p> <p>Trafford state (in response to point 27 of my Stage 2 complaint) that <i>“Places For Everyone largely assumes that the CRR is in Place”</i> once again confirming that this was a predetermined decision.</p>

Gunning Principle	Why I think the Principle has been breached
<p>There must be sufficient information to give 'intelligent consideration' to the proposal (information must be available, accessible, and easily interpretable for consultees)</p>	<p>If, as Trafford suggest, the formative stage of this proposal was in the 2012 Core Strategy, it should be noted that the information about the CRR was very limited in that document (a line on a page, with a value of just £3m). There was another line, in the same section about a proposed bridge across the Manchester Ship Canal, an initiative that has not had any work at all undertaken, I have checked this via an FOI request.</p> <p>I have been repeatedly requesting information and evidence about the impact of the CRR decision. More recently I have done this via Freedom of Information Act requests because information is not forthcoming. This does not change the lack of available, accessible and interpretable information but it does result in a formal record of the requests. Some examples are set out below:</p> <ul style="list-style-type: none"> <li>• On 18<sup>th</sup> August 2021, I requested a copy of <a href="#">the carbon emissions implications of the plan</a> for New Carrington, including the Relief Road. I finally received confirmation from Trafford, on 14<sup>th</sup> March 2022, that they do not hold the information I requested.</li> <li>• On 8<sup>th</sup> March 2022, I requested a copy of <a href="#">the detailed plan relating to the CRR</a> (this was mentioned at the Scrutiny Committee meeting of 12<sup>th</sup> January. The document that was eventually sent to me on 18<sup>th</sup> July 2022 only partially met my request and cannot be described as a detailed plan.</li> <li>• On 11<sup>th</sup> January 2022, I requested a copy of all the <a href="#">supporting reports relating to the Options Appraisal</a> for the Carrington Relief Road, 3 reports were provided 28<sup>th</sup> February 2022, the remaining reports are still awaited, including the report about the carbon emissions calculations that were included in the Options Appraisal Report.</li> </ul> <p>I am particularly concerned that the background information about the carbon implications of the road are not transparently available. Trafford confirms that the route across Carrington Moss (Option F) will require 30% more HGV journeys during construction phase but the Option Appraisal considers the alternative (Option A) to have the highest carbon implications. Natural England consider the route across the moss (F) to be much more environmentally damaging than the alternative (A), yet the carbon sequestration implications do not follow their guidance.</p>
<p>There must be adequate time for consideration and response</p>	<p>The limited public engagement exercise did not follow the widely accepted minimum 12 weeks for consultation with the public. One could argue that, given the pandemic, any consultation should have been longer during this period, because many people were sick or recovering, were managing home schooling, home working or lack of support issues.</p> <p>Removing this project from the Spatial Plan has caused extreme issues for residents, such as myself. The expected planned consultation will take place during the same period (Winter 2022) as the Places for Everyone (P4E) Examination in Public and many residents will be involved in preparing responses, attending the Hearings and will also be working! Given that both plans impact the same residents, many will have to choose whether they participate in the consultation about the road or the Hearings related to P4E. This is not acceptable.</p>

Gunning Principle	Why I think the Principle has been breached
<p>'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>	<p>Given that Trafford state (in response to point 27 of my Stage 2 complaint) that <i>"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"</i>, it is interesting that the <a href="#">Executive Committee Report</a> (from page 443), paragraph 1.6 states that the project team has <i>"taken on board the issues that have been raised by the community"</i>. Which "community" are they referring to?</p> <p>I was part of a group of resident representatives who joined an online meeting to feed back our questions to Trafford on 8<sup>th</sup> March 2021. One of the questions we raised was <i>"Residents believe improvements can be made to the design of Option A. How can these be fed into the process? Our ideas for improvement would reduce the impact of land ownership issues and will significantly reduce traffic disruption during construction"</i>. We received no response (to any of our questions). I forwarded this document to Senior Managers at Trafford and still received no response. This is despite making it clear to those Senior Managers that we believed our ideas would result in lower costs for the public purse, less environmental damage and would be more acceptable to local residents.</p> <p>In addition, in <a href="#">response to that engagement exercise</a>, we requested that the number one objective for the Carrington Relief Road should be protecting the health and wellbeing of existing residents. Not only did this request not make it to the top of the list, it is not even included as an objective at all and residents have had no feedback from Trafford about their list of questions since the document was submitted. It is clear there has been no genuine consideration of resident inputs.</p> <p>In August 2021 Trafford produced a <a href="#">Preferred Option Report</a> (which was, once again, full of factual errors and misleading statements). There had been no changes to Option A (because residents had not been involved in the design and had not had the opportunity to input our ideas and suggestions). I had also requested workshops to discuss specific items that residents are concerned about, again, I received no response to my repeated requests.</p> <p>Stating that the pandemic <i>"interrupted our plans for community participation"</i> is not acceptable. Clearly, Trafford prioritised the progression of the road and fast-tracked the route decision, despite the challenges Covid brought. Online meetings became the norm during the period and presumably took place to allow Trafford employees to communicate with each other, with landowners/developers and with consultants. This same approach could, and should, have been deployed to allow residents to input to the process.</p> <p>The <a href="#">CRR Preferred Option Report</a> states (bottom of page 25), in relation to the public engagement exercise, that the <i>"most common themes raised in the responses were around the environmental impact"</i> yet does not mention the advice or concerns highlighted by Natural England, nor does it set out the specific questions raised by residents in relation to environmental concerns. These issues are also not mentioned in the Committee Report that was presented to Councillors.</p> <p><a href="#">Appendix 3</a> to that Preferred Option report was supposed to summarise the questions received. Yet, 21 of the 23 questions posed by resident representatives were not even referenced in the report.</p>

Gunning Principle	Why I think the Principle has been breached
	<p>If Trafford considers the limited public engagement exercise to be a consultation, the lack of conscientious consideration of our feedback would be a breach of the Gunning Principles (see my response to point 3 Stage 2 response, which confirms why residents do not consider that exercise to have been a consultation).</p> <p>The Executive report also makes a pretence of taking conscientious consideration of resident feedback! Paragraph 1.9 suggests that a significant package of public transport, road safety and active travel measures were proposed <b>as a consequence of the public engagement exercise</b>.</p> <p><b>This is</b> totally disingenuous and, once again, incorrect! We had already been told that these schemes were being proposed long before the exercise and this was confirmed at a presentation given by Trafford Officers on 3<sup>rd</sup> November 2020, the document explicitly stated that the investment included the Carrington Relief Road, delivered alongside public transport and active travel improvements. Indeed, in a response to questions raised by FOCM in 2019, Trafford Council responded (8<sup>th</sup> March 2019) that: <i>“it should be noted that all roads illustrated on the indicative masterplan are proposed as multi-modal routes and are therefore proposed to include bus and active travel routes”</i>.</p>

## Appendix 5: Green Claims Code

The Government’s [Green Claims Code](#) protects consumers from misleading environmental claims and requires businesses to adhere to six principles which ensure their claims are genuine. The Code notes that consumers should be able to make “*informed choices*”. This is impossible to do if consumers/residents are not provided with comprehensive and accurate information. The Code is also intended to ensure that any environmental claims can be substantiated.

Whilst the Green Claims Code is not aimed at public sector bodies, I believe Local Authorities should be able to demonstrate that they meet these same principles.

I set out below some examples of how the six principles are breached by Trafford in relation to the Carrington Relief Road, with a focus on one document, the [CRR Preferred Option Report](#):

Green Claims Code Principle	Why I think it has been breached
Claims must be truthful and accurate	Natural England state (see letter attached) that the assessment <b>does not</b> provide “ <b><i>an accurate representation</i></b> ”. It goes on to highlight their concerns further, stating that the assessment was an “ <b><i>inaccurate and unbalanced view of the environmental constraints</i></b> ”.
Claims must be clear and unambiguous	<p>There are many instances of the documentation failing this test but one of the key examples is the carbon emissions figures. Trafford assert (in the Option Appraisal) that <b>Option F requires 30% more construction journeys</b>, yet the carbon emissions for Option A are higher than those for Option F. We are concerned that Trafford has not captured the equivalent carbon data for both Options.</p> <p>Furthermore, whilst Trafford confirms that Option F requires <b>2.5 times more water storage</b> than Option A, it goes on to suggest that Option F <i>is the most favourable option in relation to the Environment</i>.</p>
Claims must not omit or hide important relevant information	<p>Again, there are numerous examples of failures of this principle.</p> <p>Natural England advised that a full Environmental Scoping Report should be undertaken to “<i>inform the decision of the preferred route</i>”. Trafford Officers not only ignored that advice, they totally omitted it from the reports to the Executive Committee. They also omitted references to 21 out of 23 questions posed by community groups, including those relating to environmental concerns.</p> <p>Trafford Officers also omitted to advise Councillors that the Option F route could affect the restoration of the wider peat moss because of the impact of drainage and hydrology issues.</p> <p>I believe, following discussions with (and presentations from) staff from Cheshire and Lancashire Wildlife Trusts, the peat moss at Carrington is fully capable of restoration and as such, should be treated as an area of high conservation priority. To neglect to advise Committee members that the Option F proposal could result in such restoration being significantly impacted is not only a breach of the Green Claims Code, it demonstrates an unacceptable level of indifference.</p> <p>Clearly, my concerns resonate with Natural England as they included a copy of their research paper about the Greater Manchester Peat Pilot as additional advice to Trafford, along with their letter of 22<sup>nd</sup> March 2021 (attached). They also highlight some specific advice in their letter and in their Annex A.</p>

Green Claims Code Principle	Why I think it has been breached
<p>Comparisons must be fair and meaningful</p>	<p>Trafford Officers did not highlight the concerns raised by Natural England in their comparison of the route options, including Natural England’s views that the assessment was an <i>“inaccurate and unbalanced view of the environmental constraints and it is Natural England’s view that Option F would be considerably more damaging than Option A”</i>.</p> <p>In addition, the Option Appraisal includes very selective assessment of air and noise pollution receptors (and no assessment about the increase in light pollution). There is no assessment of the impact on the residents of Sale West, nor on the users of Carrington Moss, including the SEN children and those who train and play on the sports grounds and, specifically, there is no assessment of the impact on the ecology, biodiversity, the birds and wildlife, all of which will be considerably affected by the construction of Option F.</p> <p>Committee members were not advised that Option A would adhere to the Government’s <a href="#">Planning Guidance</a> relating to the avoidance of harm to the natural environment, whereas Option F would be contrary to that guidance.</p>
<p>Claims must consider the full life cycle of the product or service</p>	<p>We do not believe the carbon emissions calculations take account of the operational period of the road. We would also challenge the sequestration loss figures, which appear to have been maximised for Option A and minimised for Option F.</p> <p>The long-term ecology/biodiversity impacts of Option F also appear to have been inappropriately minimised.</p> <p>Many of the costs relating to Option F are not set out in the document, including, for example, issues arising as a consequence of climate change such as more frequent flooding/drainage requirements. These have been highlighted by Trafford’s Council Leader in a recent <a href="#">video</a> in which he states that extreme weather events, air pollution and water shortages are likely to inflict a huge human and financial cost on Trafford in the years ahead and confirms that addressing the climate crisis is one of Authority’s key priorities. This is not borne out by a decision to construct a road across Grade 2 best and most versatile agricultural land, woodland, wetland and peatmoss!</p>
<p>Claims must be substantiated</p>	<p>It is very difficult to substantiate the assertions Trafford makes in its documentation because it is so hard to access the detailed information, such as that about carbon emissions, mentioned above.</p> <p>In addition, whilst Trafford Officers confirm that the extent of the ecological impact is <i>“still largely unknown”</i> and, given that the full Environmental Scoping Report, which Natural England advised should be done to <i>“inform the decision”</i> about the preferred route has not been completed, we believe the Preferred Option Report claim that <i>“Option F appears to be the most favourable route option in terms of Environmental impacts”</i> <b>is not substantiated</b>.</p>