

TRANSPORT AND WORKS ACT 1992

TRANSPORT AND WORKS (APPLICATIONS AND OBJECTIONS PROCEDURE) (ENGLAND AND WALES)
RULES 2006

STATEMENT OF CASE ON BEHALF OF TRAFFORD COUNCIL

MAY 2022

Introduction

1. The Manchester Ship Canal Company (“MSCC”) is the promoter of the Rixton and Warbuton Bridge Order 2021 (“the Order”) to which Trafford Council is a statutory objector.
2. This Statement of Case is submitted pursuant to the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules (“the Rules”) on behalf of Trafford Borough Council (“the Council”).

Statement of Case

3. The Council set out its objection to the Order in its letter dated 7 January 2022 to the Secretary of State for Transport. The Council also set out its comments on the Draft Order to BDP Pitmans (acting on behalf of MSCC) in its letter dated 26 October 2021. Comments on this letter were received from BDP Pitmans on 26 November 2022.
4. This Statement of Case sets out the Council’s position in light of the above correspondence.

Transfer of Undertaking

5. The Council questions the proposed transfer of all statutory and other powers and duties from MSCC to the proposed Rixton and Warburton Bridge Company (“the Company”), as detailed within the Rixton and Warburton Bridge Draft Transport and Works Order, November 2021 (under Paragraph 5 of Part 3 - Transfer of the Undertaking).
6. The Rixton and Warburton Bridge Concise Statement of Aims (November 2021) document states (in paragraph 2.3) that:

“The proposed Order contains provisions for MSCC to transfer the Rixton and Warburton Bridge Undertaking to the Rixton and Warburton Bridge Company Limited, should MSCC so resolve, in order to ensure a more efficient operation and management of the Bridge and the Manchester Ship Canal. This will also allow for greater transparency relating to income and expenditure associated with the Bridge, including any funds ringfenced for future maintenance or a replacement bridge and increased for the future setting of toll levels”.

7. The transfer of the Undertaking is central to the Council’s objection to the proposals. MSCC appear to view the bridge as a stand-alone edifice which needs to be sustained in isolation. The Council disagrees.

8. Whilst the origins of the bridge may lie in a historical crossing of the river Mersey, since the 1890's the bridge has been part and parcel of the infrastructure of the Manchester Ship Canal. Just as the building of a railway necessitates the construction and subsequent maintenance of bridge crossings by Network Rail, which facilitate the flow of goods and passengers along the line, so it is with the canal. MSCC gains benefit from unfettered navigation at the price of severance of adjacent communities.
9. The Manchester Ship Canal Company Limited Report and Financial Statements For the year ended 31 March 2021 ("the MSCC Financial Statement") states (on page 2) that:

"The principal activities of the Company are the provision of port facilities, cargo handling and marine related services, including being the Statutory Harbour Authority for the Port of Manchester, which includes the Manchester Ship Canal. An integral part of the port operations is the management of its land and property interest".
10. The Profit and Loss Account for the year ended 31 March 2021 (page 23) of the MSCC Financial Statement highlights a profit for the financial year of £37.3 million. This figure has increased from £26.0 million from the previous financial year. The Balance Sheet (page 25) for the same period also highlights Total Shareholder's Funds of £47.3 million (up from £45.8 million the previous year).
11. The MSCC Financial Statement shows that the company is operating at a clear profit. Separating the ownership of the Undertaking from the wider ship canal, may leave it devoid of the resources that are required with the larger operation of maintaining the canal. If the new company becomes financially unviable, without revenues from the wider canal or for any other reason, this may lead to pressure to further increase the proposed toll on the bridge and / or request financial support from the relevant local authorities in order to keep the bridge in operation.
12. The Council therefore objects to the proposed transfer of all statutory and other powers and duties from MSCC to the Company.

Tolling Arrangements

13. The Order, under Part 4, 8. (7) Tolls, lists the proposed tolls or charges which may be applied by MSCC. The sub-paragraph states that:

"The tolls or charges charged in accordance with this article may be applied by MSCC for any purposes in connection with safe efficient and economic management, operation and maintenance of the Rixton and Warburton Bridge, including but not limited to-".
14. The Council objects to the inclusion of the wording 'including but not limited to' within sub-paragraph 8. (7). The proposed wording is far too open and allows for additional unspecified circumstances. The Order must clearly set out (and limit) what circumstances are appropriate for the charging of tolls.

15. Sub-paragraph 8. (7)(f) goes on to state that tolls or charges may be charged to:

“Provide a return on investment in the Undertaking”.

16. As outlined in paragraph 8 of this Statement of Case, the Undertaking has been part and parcel of the infrastructure of the Manchester Ship Canal. The wording of sub-paragraph 8. (7)(f) in combination with the transfer of the Undertaking to a separate company, devoid from the Manchester Ship Canal, creates the opportunity for the Undertaking to become a profit-making entity in its own right.
17. There is also a risk that the new operating company could be sold as a stand-alone profit making entity.
18. The Sustainable Investment Business Case (November 2021) prepared for the Manchester Ship Canal Company Limited by Vivid Economics (“the Business Case”) estimates that the cost of refurbishing the bridge and setting up a back office free-flow tolling system will be £6.5M, with annual operating costs of £450k per year
19. Page 6 of the The Rixton & Warburton Toll Bridge Sustainable Investment Plan (July 2021) (“the Investment Plan”), contained within the Rixton and Warburton Bridge Consultation Report Appendices, states that:
- “... in September 2019, just under 9,000 vehicles per day crossed the bridge in both directions...”*
20. The above flows, subject to the proposed £1.00 toll per crossing, would equate to £9k per day (or £7.2k per day excl. VAT). This would result in £2.5M per year excl. VAT, based on 350 days / per. This is a substantial figure which would provide a healthy profit after factoring in the £6.5M investment and the stated creation of a reserve fund amassed over a 20 year period of no more than 30% of the total bridge replacement cost of £15M.
21. The Council considers that as the Undertaking is a historical part of the canal operation and that any profits from that operation should go towards the upkeep of the bridge, rather than it being solely at the cost of the users.

Level of Tolls

22. The proposed Order, under Schedule 1, Part 1 Level of Tolls 1. (1), states that:

“The maximum tolls that MSCC may demand and take in respect of passing over the Rixton and Warburton Bridge are to be £1.00 as may be adjusted in accordance with sub-paragraphs (2) and (5)”.

23. The proposed increase in the toll (per crossing) from 12.5 pence to £1.00 (inclusive of VAT) is a significant (eight-fold) increase on local users of the crossing, most of whom have no reasonable alternative means of crossing the Manchester Ship Canal.

24. The Business Case in section 3.4 compares the proposed toll with various other toll facilities operating within the country.

25. The report in 3.4.2 states that:

“However, looking at those bridges where a comparison is appropriate and can be made, the toll levels for cars per trip range from 5p at Swinford to £1 at Clifton. The average of all these facilities is approximately 45p.”

26. As highlighted by the Business Case, the current toll of 12p is the second cheapest of those compared. However, the proposed charge of £1.00 would be the joint highest toll in the comparison, with Clifton, and more than twice the average of the those compared.

27. The Clifton Suspension Bridge is a substantial suspension structure spanning the Avon Gorge and the River Avon, linking Clifton in Bristol to Leigh Woods in North Somerset. Motorised vehicles pay £1.00 to cross the bridge which, according to the Clifton Suspension Bridge Trust’s website (cliftonbridge.org.uk), all goes towards maintenance and upkeep.

28. The Business Case rightly states that every bridge has its own unique circumstances, which in turn influence the associated required tolls, and that drawing comparisons between toll levels on the various bridges is of limited value. However, the report then concludes section 3.4.3 by drawing a direct comparison by stating the following:

“While an increase to £1.00, if implemented, would set the R&W Toll Bridge at the higher end of other small bridge tolls. It still leaves the toll significantly below the other existing tolled crossings of the Mersey and is likely to be the only small toll bridge that is currently making an allowance in its toll rate for any Covid-19 related traffic downturn”.

29. The Council challenges this assertion on two counts. Both the Mersey Gateway and Mersey Tunnel are both major river crossings, comprising significant infrastructure, which link major built-up urban areas. Any comparison between these structures and the Rixton and Warburton Toll Bridge is therefore considered to be both unnecessary and misleading. Secondly, the assertion that the toll rate makes an allowance for any Covid-19 related traffic downturn is also considered to be questionable.

30. Section 4 of the Business Case considers Traffic and Revenue. Whilst the Council acknowledges that Covid-19 has an impact on traffic flow, it considers this to be a relatively short-term issue, which is now being overcome. The Business Case even states in the first bullet point on page 29 that:

“It appears that weekday traffic levels have somewhat recovered to pre-pandemic levels, where the peak average flow in October 2019 reached 549 vehicles, whilst in October 2021 the peak flow reached 516 vehicles”.

31. Transport for Greater Manchester (TfGM) also report on Greater Manchester (GM) traffic volumes weekly. Figure 1: Estimated Highways trips in GM (overleaf), is an extract from TfGM’s Network Summary Report period: Week ending 24 April 2022. The chart indicates

that while volumes across GM have not fully returned to pre-Covid levels, they are at an estimated 95% of the equivalent week in 2019.

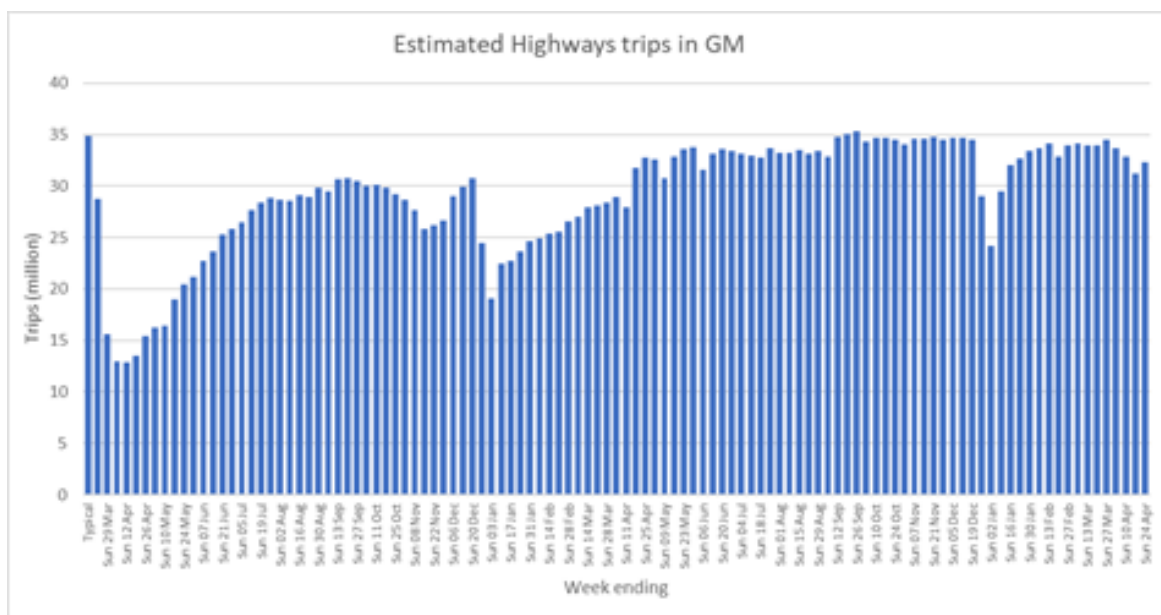


Figure 1: Estimated Highways trips in GM (Source: TfGM Network Summary Report - 20220425)

32. The Council considers that Covid-19 has had a temporary impact on traffic flows using the crossing. The last remaining Covid-19 restrictions within England were lifted in early 2022, and the best available traffic data suggests that flows are not operating at a significant reduction. The Council therefore considers it unreasonable to factor Covid-19 into a longstanding future Toll charge enshrined in legislation, for a time period not subject to Covid-19 related restrictions or guidance.
33. Section 3.3 of the Business Case also tries to provide justification for the Toll through considering the Vehicle Operating Costs (VOC) between smaller local villages using alternative routes to the Rixton and Warburton Bridge. Tables 3-3 and 3-4 conclude that use of the Bridge generates a VOC saving of between £2.69 and £5.91.
34. Section 3.6 of the Business Case uses the above VOC savings to conclude that:

“Importantly, the time and distance savings for all routes, with the exception of Leigh to Sale, are greater than the value of the increased toll being proposed, which would indicate most users will still gain significant benefits from using the R&W Toll Bridge, even after a toll increase of up to £1.00”.
35. The Council strongly objects to the use of applying the comparative cost savings of longer alternative routes to justify the proposed toll increase. The Rixton and Warburton Bridge is a long-standing structure which has served as a vital local crossing across the Manchester Ship Canal for local communities. The comparative cost of crossing the Ship Canal via longer alternative routes is considered to be irrelevant to the level of toll charged.

36. Another example of the Manchester Ship Canal owner's responsibility to providing and maintaining access across the canal is the Hulmes free Ferry. Originally established in 1885 by an act of parliament, the owners of the Manchester Ship Canal are responsible for providing a free ferry to replace a low-lying bridge that had to be demolished to allow access for tall ships along the canal. The ferry is still in operation without charge.

Concessions – Daily Charge

37. Currently users of the Undertaking are charged a capped 25 pence toll no matter how many crossings they make within a day. This longstanding arrangement is capped by Schedule 49 of the Rixton and Warburton Bridge Act 1863 ("the Act"), which limits the number of tolls that may be collected in any one and the same day to no more than two full tolls.
38. Section 6.3 of the Business Case sets out the 'Base Case' assumptions that underpin the business plan, and therefore aim to justify the increased toll of £1.00. A capped daily charge is not mentioned in this section, nor any other section of the report.
39. BDP Pitmans comments on the Council's letter of objection to the draft Order ("the BDP Pitmans response") dated 23 November 2021, state (on page 3) that:

"In terms of discount, MSCC has publicly stated that we anticipate at least two discounts. Assuming the toll for a single trip is up to £1.00 (Inc. VAT at the current rate of 20%) we will cap any daily tolls to the total for two trips or £2.00 (Inc. VAT at the current rate of 20%)."

40. The above statement is not reflected within the Order as drafted.

41. The BDP Pitmans response goes on to state that:

"Article 9(11) of the Order provides that a composition agreement may provide for a discount or waiver of any toll or part of any toll in respect of the use of the Rixton and Warburton Bridge. MSCC will rely on this power to include various discount arrangements but in line with other orders regulating tolls, the precise discount would not be enshrined in statute to ensure level of flexibility both for the users of the Bridge and for the operator. This approach has been adopted on many other toll/charging schemes/order whereby the Order itself allows for discount schemes and such schemes are then included separately for example as part of a composition agreement. This is the case for Dart charge and for Mersey crossings".

42. The Council considers that the wording of the Article does not provide satisfactory reassurance that a local discount will either be applied or if so, at an appropriate level. The Council therefore objects to the removal of the continuation of the long-standing arrangement to cap any daily tolls to the total for two trips.

Concessions – Local Connections

43. The Undertaking is the only route across the Manchester Ship Canal between the M6 and M60, as illustrated by the map in Appendix 2 to this Statement. It provides a vital link

between the communities of Rixton in Warrington with Warburton and Partington in Trafford, and wide areas of Cheshire in the north and Greater Manchester to the south.

44. Section 3.3 of the Business Case sets out an example alternative detour between Partington and Glazebrook via the M6. This would result in a total journey length of 13.2km, which would be approximately twice the distance compared to using the Rixton and Warburton Bridge.
45. The substantial additional distance needed to cross the Manchester Ship Canal via the M6 or M60 for local communities of Warburton and Partington within Trafford emphasises the crucial role the Bridge plays in providing a vital local crossings.
46. The Investment Plan states (on page 12) that a local customer discount, set at around 50% for the residents of Postcodes WA3 6 and WA13 9 could be considered (i.e., 50p including VAT at the current rate of 20%).

47. Section 4.6 of the Business Case states that:

“The business case also considers an additional Local User Discount of 50%. It is currently anticipated that this will be offered to those residents in postcodes WA3 6 and WA13 9”.

48. Section 6.3 and Table 6-1 of the Business Case sets out the ‘Base Case’ assumptions that underpin the business plan, to justify the increased toll of £1.00. This includes a 50% discount being offered.

49. The accompanying commentary to Figure 6-1 of the Business Case concludes that:

“Figure 6-1 below shows the build-up of the surplus year-on-year that would be set aside in the reserve account. As can be seen, year 1 only has a surplus of around £100k. This suggests that the toll could be just under 90p including VAT if no reserve fund were required”.

50. Section 6.4 of the Business Case then sets out a ‘Downside Case’ scenario which includes a number of assumptions which the Council disputes.

- i. Firstly a -7.5% one-off impact of Covid-19 is assumed. As stated within paragraph 32 of this Statement, the Council considers it unreasonable to use Covid-19 as justification to increase a long-standing future toll charge. The Council therefore argues that this assumption should be removed, particularly as the same table also includes a minor annual growth (0.9%) in traffic.
- ii. Secondly, a Price elasticity of -0.1 has also been assumed. Section 4.5 of the Business Case states that *“Extensive research on other barrier crossing toll bridges around the world indicates a price elasticity of around -0.10, for bridges similar to the R&W Toll Bridge”*. No further information is provided to justify this statement.

51. Section 6.5 of the Business Case sets out an 'Upside Case' scenario. This includes the local discount of 50% but does not include a 'one-off impact from Covid-19' assumption. The Council consider this scenario to be more appropriate (as even the Base Case includes a -5% 'One-off impact of Covid-19 assumption).
52. At no point in the Business Case does it recommend that the 'Downside Case', which excludes the 50% local discount, should be taken forward. Nor does it state anywhere that either the 'Business Case' or 'Upside Case', which includes the 50% local discount, cannot be achieved if an increased toll of £1.00 is applied.
53. All references to the local discount of 50% within the Business Case relate to postcodes WA3 6 and WA13 9. Appendix 2 of the Council's letter of objection (dated 17 January 2022) includes a map of postcode areas which the Council considers to be appropriate for a local concession. Within Trafford Borough, this includes postcode areas WA13 9 (Warburton) and M31 4 (Partington). This map has also been included in Appendix 3 to this Statement.
54. Partington experiences extremely high levels of deprivation. There is also a high sense of isolation due to poor public transport and road links to other areas.
55. The English Indices of Deprivation, published 26 September 2019, ranks Lower Lower-layer Super Output Area (LOSA) Trafford 017 (Bucklow - St Martins) which includes Partington, as one of the most deprived wards in England. The data highlights that LOSA's Trafford 017B and 017E (south Partington) are ranked within the Index of Multiple Deprivation (IMD) Decile 1 = most deprived (with 10 being least deprived). Trafford 017D is also ranked within IMD Decile 2.
56. Of the 32,844 wards by IMD ranking, Trafford 017E is the 490th most deprived ward within England; with Trafford 017B being the 2,097th most deprived and Trafford 017D being the 4,030th most deprived (Source: [Deprivation \(traffordjsna.org.uk\)](https://traffordjsna.org.uk)).
57. The Trafford Poverty Strategy 2021/22 also highlights the IMD rankings for LOSA's within Trafford (on page 5). Figure 2 (overleaf) is an extract from the Trafford Poverty Strategy which illustrates levels of deprivation across Trafford. (The red oval has been added for illustration purposes).

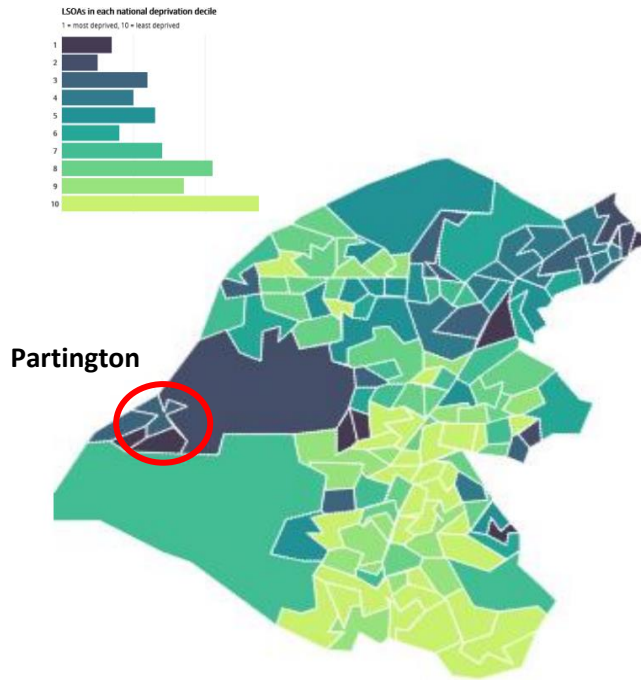


Figure 2: Trafford LSOAs in each national deprivation decile

58. Any increase in the Toll without significant discounts for local residents, particularly within Partington, could therefore create a long-term financial burden. The Council therefore cannot support any increase in the Toll without a significant discount (of at least 50%) being made available to residents within Warburton and Partington Parishes.

Future Toll Increases

59. The Order proposes under Schedule 1, Part 1 Level of Tolls 1. (2), states that:

“MSCC may make an adjustment in April of any year in the amount of tolls specified in sub-paragraph (1), as may be revised under sub-paragraph (5), and any such adjustment will be no more than the percentage difference between the consumer price index for February of that year and the consumer price index for the month of February immediately preceding the making of the Order and then subtracting one per cent”.

60. Section 3.5 of the Business Case clearly states that:

“Traditionally most small bridge tolls are not indexed to inflation”.

61. The Business Case then goes on to states that:

“a non-indexation approach is only sustainable with high traffic growth, given the inevitable increase in the costs of operation and maintaining facilities over time”.

62. BDP Pitmans response also states that:

“A strategy of non-indexation of tolls, given the costs of operating and maintaining these facilities inevitably increase, is however only sustainable with high traffic growth. While this was a viable approach in the later decades of the 20th century, when car ownership was still growing strongly, traffic growth into the future is now assumed to be much lower, and evidence from recent traffic on the R&W Toll Bridge, even before Covid-19, was that traffic levels were at best, flat and possibly declining. Therefore, to ensure a sustainable future for the R&W Toll Bridge, in a world where costs of materials and labour will continue to increase at a rate that is higher than any growth in traffic, there must be at least the option to increase tolls year on year”.

63. No evidence has been provided of other Toll Bridges of a comparable size / profile having tolls linked to inflation.
64. The current proposed Toll increase is already eight-fold on current levels. Additional future indexation would result in annual prices increasing year-on-year and would place an unfair burden on local communities who rely on the crossings for daily activities. The Council therefore objects to the Toll being indexed to inflation.

Automation of Toll Collection

65. Section 5.2.5 of the Business Case concludes that whilst retaining an existing barrier system would be cheaper than the additional cost of a free-flow tolling system, it would not address stakeholder concerns over delays, safety and environmental impacts in the village of Warburton.
66. Table 6-1 of the Business Case (Base Case – General Inputs) estimates that the operating costs of the free-flow tolling system to be £450k a year. This is approximately 5 times the current operating cost of the barrier system, which the Business Case states is around £90k a year.
67. Whilst the Council acknowledges that the existing barrier system has congestion issues, which can impact on highway safety, the Council does not consider it fair for the additional costs of the free-flow tolling system to be passed on to local residents who rely on the bridge to meet their daily needs through the implementation of significantly higher toll charges.

Other matters

Offences and powers to make byelaws

68. The use of Traffic Orders is the way the use of the road and bridge should be regulated. It is therefore questioned why power should be bestowed to MSCC for them to make byelaws for the regulation of the use of the road.

Closing the Rixton and Warburton Bridge

69. The Order under Part 2, 4. enables MSCC to close all or any part of the bridge in any case of emergency or for the purpose of or in connection with the authorised activities. The Council

considers that any closures should be kept to a minimum and that reopening of the bridge should take place as soon as practically possible. The Council therefore requests that the Order should be amended to clearly state a requirement for prompt, safe reopening of the bridge following any period of closure.

APPENDIX 1 – LIST OF DOCUMENTS TO BE REFERRED TO IN EVIDENCE*

A: Appellant's TWAO Application:

1. Rixton and Warburton Bridge Draft Transport and Works Order (November 2021)
<https://www.warburtontollbridge.co.uk/media/1420/a2-draft-order.pdf>

B: Appellant's TWAO Application Supporting Documents:

2. Rixton and Warburton Bridge Concise Statement of Aims (November 2021)
<https://www.warburtontollbridge.co.uk/media/1422/a4-concise-statement-of-aims.pdf>
3. Rixton and Warburton Bridge Sustainable Investment Business Case (November 2021)
<https://www.warburtontollbridge.co.uk/media/1423/a5-business-case.pdf>
4. Rixton and Warburton Bridge Consultation Report (November 2021)
<https://www.warburtontollbridge.co.uk/media/1426/a6-consultation-report.pdf>
5. Rixton and Warburton Bridge Consultation Report Appendices (which includes the Rixton & Warburton Toll Bridge Sustainable Investment Plan) (November 2021)
<https://www.warburtontollbridge.co.uk/media/1427/a6-consultation-report-appendices.pdf>

C: Trafford Council Responses (electronic copies of documents submitted):

6. Letter of Objection to the Order (dated 22 January 2022)
7. Comments on the draft Order (dated 26 October 2021)
8. Response to MSCC Sustainable Investment Plan Consultation (dated 18 August 2021)

D: BDP Pitmans Response to Trafford Council (electronic copy of document submitted):

9. BDP Pitmans response (on behalf of MSCC) to Trafford Council's Comments on the draft Order (23 November 2021)

E: Legislation

10. The Rixton and Warburton Bridge Act 1863
<https://www.whatdotheyknow.com/request/387618/response/935840/attach/html/2/160706%20Rixton%20and%20Warburton%20Bridge%20Act%201863.pdf.html>
11. Transport Charges &c. (Miscellaneous Provisions) Act 1954
<https://www.legislation.gov.uk/ukpga/Eliz2/2-3/64?view=plain>
12. Road Traffic Regulation Act 1984
<https://www.legislation.gov.uk/ukpga/1984/27/contents?view=plain>
13. Road Traffic Act 1988
<https://www.legislation.gov.uk/ukpga/1988/52/contents?view=plain>
14. Road Traffic Offenders Act 1988
<https://www.legislation.gov.uk/ukpga/1988/53/contents?view=plain>

F: National Documents, Policy and Guidance

15. National Planning Policy Framework (2021)

- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf
16. National Planning Practice Guidance
<https://www.gov.uk/government/collections/planning-practice-guidance>
 17. HS2 Phase 2b Western Leg (Crewe-Manchester) hybrid Bill and accompanying documents/evidence (2022)
<https://www.gov.uk/government/collections/hs2-phase-2b-high-speed-rail-crewe-manchester-bill-2022>
 18. Government List of Toll Road Charges at Toll road charges and associated information
<https://www.gov.uk/uk-toll-roads>
 19. Manual for Streets 2
<https://www.tsrgd.co.uk/pdf/mfs/mfs2.pdf>
 20. Design Manual for Roads and Bridges (CD123)
<https://www.standardsforhighways.co.uk/prod/attachments/962a81c1-abda-4424-96c9-fe4c2287308c?inline=true>
 21. Historic England – Managing Significance in Decision Taking in the Historic Environment
<https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/>
 22. Historic England – The Setting of Heritage Assets
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>
 23. Historic England – Conservation Principles, Policies and Guidance
<https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/conservationprinciplespoliciesandguidanceapril08web/>

G: Greater Manchester Documents, Policy and Guidance

24. Greater Manchester Strategy 2021---2031
<https://aboutgreatermanchester.com/media/jlslgbys/greater-manchester-strategy-our-plan.pdf>
25. Places for Everyone Plan – Submission Document (2021)
<https://www.greatermanchester-ca.gov.uk/media/4838/places-for-everyone.pdf>
26. Places for Everyone – Supporting Evidence and background documents
<https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/>
27. Places for Everyone – Submission Documents
<https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/submission-documents/>
28. New Carrington GMSF Masterplan (September 2020)
<https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/10.09%20Site%20Allocations%20-%20Trafford/JPA33%20New%20Carrington/10.09.06%20-%20JPA33%20-%20New%20Carrington%20Masterplan%202020.pdf>
29. TfGM Transport Strategy 2040 (published 2017, updated Jan 2021)
https://assets.ctfassets.net/nv7y93idf4jq/01xbKQQNW0ZYLzYvcj1z7c/4b6804acd572f00d8d728194ef62bb89/Greater_Manchester_Transport_Strategy_2040_final.pdf

30. GM Transport Strategy 2040 – Delivery Plans 2021-2026 and Local Implementation Plans (LIP)
https://downloads.ctfassets.net/nv7y93idf4jq/5Y95swfmf42WVZozNA4fE/84092928376473c507ec000098b18c35/Delivery_Plan_2021-2026_Jan_2021_Final.pdf
31. Greater Manchester Local Industrial Strategy (June 2019)
<https://www.greatermanchester-ca.gov.uk/media/2132/gm-local-industrial-strategy-web.pdf>
32. Transport for Greater Manchester Network Summary Report 20220425
https://traffordgovuk.sharepoint.com/:p:/r/sites/WarburtonTollBridgeTWAO/_layouts/15/Doc.aspx?sourcedoc=%7B7A922765-7A7D-466B-B969-87A42478D8BE%7D&file=TfGM%20Network%20Summary%20Report-%2020220425.pptx&action=edit&mobileredirect=true
33. Greater Manchester Landscape Character and Sensitivity Assessment (LUC, August 2018)
<https://greatermanchester-ca.gov.uk/media/1727/greater-manchester-landscape-character-and-sensitivity-report.pdf>
34. Cost of Living Crisis GMCA Briefing Note
[https://traffordgovuk.sharepoint.com/:w:/r/sites/WarburtonTollBridgeTWAO/_layouts/15/Doc.aspx?sourcedoc=%7B19145A4E-CD56-4868-80A2-689E2A263AAD%7D&file=Cost%20of%20Living%20Crisis%20Research%208th%20April%2022%20\(002\).docx&action=default&mobileredirect=true](https://traffordgovuk.sharepoint.com/:w:/r/sites/WarburtonTollBridgeTWAO/_layouts/15/Doc.aspx?sourcedoc=%7B19145A4E-CD56-4868-80A2-689E2A263AAD%7D&file=Cost%20of%20Living%20Crisis%20Research%208th%20April%2022%20(002).docx&action=default&mobileredirect=true)

H: Trafford Council Documents, Policy and Guidance

35. Trafford Council Corporate Plan 2021-2024
<https://www.trafford.gov.uk/about-your-council/strategies-plans-and-policies/Corporate-Plan/Corporate-Plan-2021-2024.pdf>
36. Trafford Core Strategy (2012)
<http://www.trafford.gov.uk/planning/strategic-planning/docs/core-strategy-adopted-final.pdf>
37. Saved Policies of the Revised Unitary Development Plan (2006)
<http://www.trafford.gov.uk/planning/strategic-planning/docs/Unitary-Development-Plan-2006.pdf>
38. Draft Trafford Local Plan (2021)
<http://www.trafford.gov.uk/planning/strategic-planning/docs/Draft-Local-Plan-Feb-2021.pdf>
39. Trafford Poverty Strategy 2021/22
<https://www.trafford.gov.uk/about-your-council/strategies-plans-and-policies/docs/Trafford-Poverty-Strategy-2021-22.pdf>
40. Trafford Council Ward Profiles
<https://www.trafford.gov.uk/residents/community/partnerships-and-communities/ward-profiles.aspx>
41. Trafford West Locality Profile
<https://www.traffordjsna.org.uk/docs/Traffords-Neighbourhoods/West-PDF.pdf>
42. Cost of Living Crisis CLT Briefing Note
https://traffordgovuk.sharepoint.com/:w:/r/sites/WarburtonTollBridgeTWAO/_layouts/15/Doc.aspx?sourcedoc=%7BA1E4F712-3E3B-4A78-A0F0-64C388849F47%7D&file=220411%20-%20CLT%20Briefing%20-%20Cost%20of%20Living.docx&action=default&mobileredirect=true

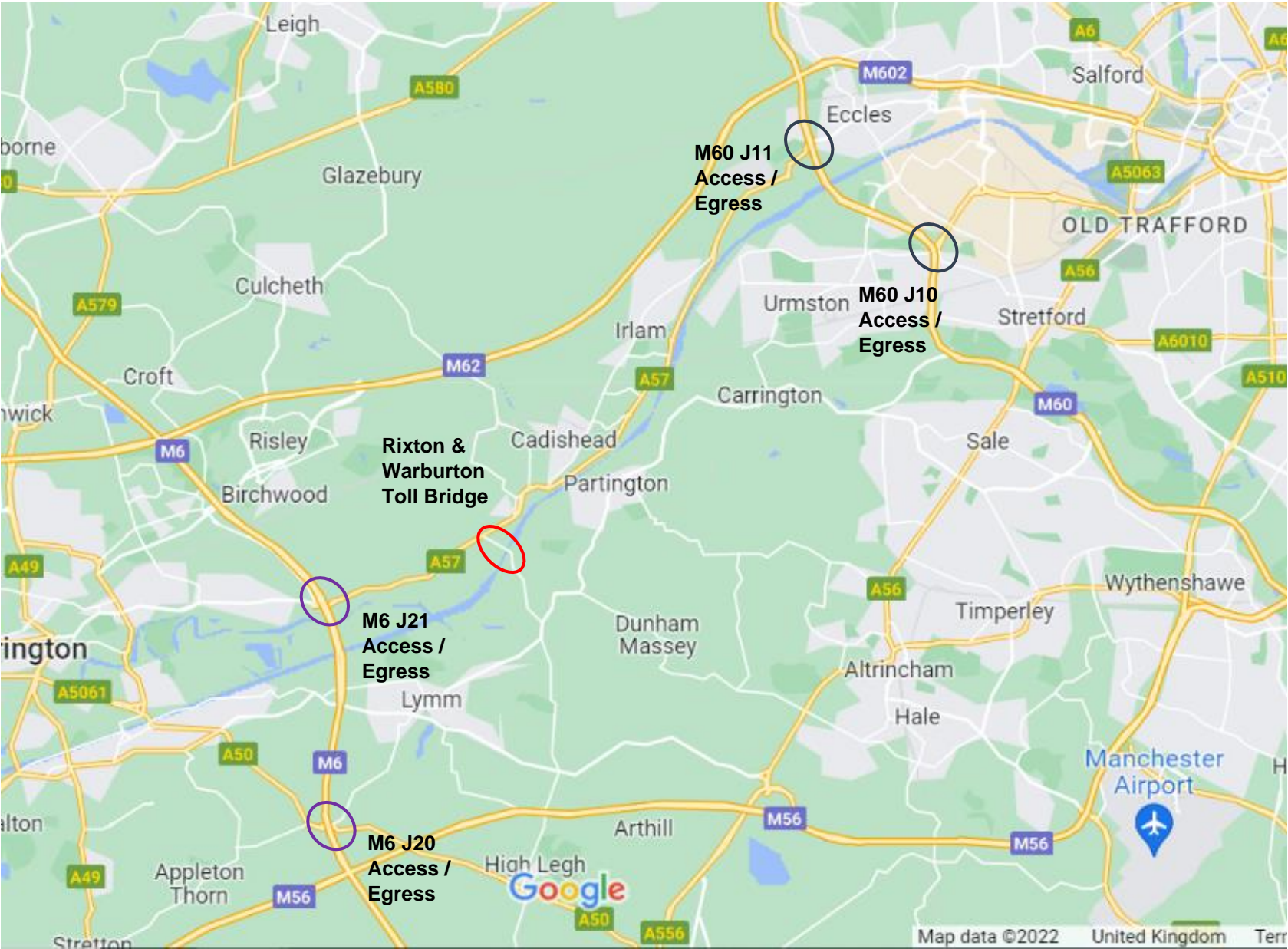
43. Trafford Economic and Housing Growth Framework (2017)
<https://democratic.trafford.gov.uk/documents/s25748/Econ%20Appendix%201%20-%20Trafford%20Economic%20and%20Housing%20Growth%20Framework.pdf>
44. Trafford Housing Strategy 2018-2023
<https://www.trafford.gov.uk/about-your-council/strategies-plans-and-policies/housing-strategy/docs/Trafford-Council-Housing-Strategy-2019-2023.pdf>
45. Trafford Town Centres Framework (2019)
<https://democratic.trafford.gov.uk/documents/s34753/Appendix%201%20Town%20Centres%20Framework.pdf>
46. Brexit and Covid-19: An Economic Impact Assessment for Trafford (2021)
<https://democratic.trafford.gov.uk/documents/s39905/210616%20-%20Appendix%202.pdf>
47. Inclusive Economy and Recovery Action Plan
<https://democratic.trafford.gov.uk/documents/s38614/Appendix%201%20-%20210121%20-%20FINAL%20Trafford%20Economic%20Recovery%20Plan.pdf>
48. Carrington Relief Road: Outline Business Case – Executive Summary (December 2019)
<https://www.trafford.gov.uk/residents/transport-and-streets/roads-highways-and-pavements/docs/Carrington-Relief-Road-Executive-Summary.pdf>
49. Report to the Planning and Development Management Committee on developer contributions towards the Carrington Relief Road (15 October 2020) and addendum(s)
<https://democratic.trafford.gov.uk/documents/s37400/Agenda%20Item%206%20-%20CRR%20Contributions.pdf>
50. Outline Business Case for the Carrington Relief Road (1 May 2018) and addendum(s)
51. Warburton Village Design Statement
<https://www.trafford.gov.uk/planning/strategic-planning/docs/warburton-village-design-statement.pdf#:~:text=The%20Warburton%20Village%20Design%20Statement%20two%20man%20these,ctr.cument%20ot%20importance%20ptovidf%3B%27%20informalton%20detailling%20how%20househnE%C3%9Ers.>
52. Warburton Village Conservation Area (Conservation Area Management Plan Consultation Draft June 2016)
<https://www.trafford.gov.uk/planning/strategic-planning/docs/June2016ConsultationDocuments/caa-camp-warburton-village-june-2016.pdf>

I: Other documents to be referred to

53. The Manchester Ship Canal Company Limited Report and Financial Statements For the year ended 31 March 2021
<https://find-and-update.company-information.service.gov.uk/company/07438096/filing-history>

* Trafford Council reserves the right to add to/amend its case and the evidence relied on in the light of any further matters raised by the Applicant, Third Parties and the Council during proceedings.

Appendix 2: Map of Rixton & Warburton Toll Bridge Alternative Routes



Appendix 3: Trafford Council Requested Local Discount Post Code Areas Map

