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Dear Sir / Madam,

### **Warrington Draft Local Plan & Local Transport Plan 4 Consultation**

As a statutory consultee in the planning system, Highways England has a regulatory duty to cooperate. Consequently, Highways England are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses. Highways England's desire to be a proactive planning partner goes beyond this statutory role but follows the spirit of the Licence which states that Highways England should: "*support local and national economic growth and regeneration*".

Highways England is charged with operating, managing capacity, maintaining and improving England's motorways and major A roads, which form the Strategic Road Network (SRN). It is an ambition to ensure that major roads are more dependable, durable, and most importantly – safe. Therefore, this review considers the proposals within the Warrington Proposed Submission Draft Local Plan Regulation 19 and associated transport evidence base in terms of the legal compliance and soundness of the documents. The review of the draft Local Transport Plan (LTP4) consultation documents, particularly focuses on the potential of the proposals to impact upon the safety and operation of the SRN within the Warrington district.

The SRN in Warrington comprises sections of the M6, M62 and M56, with the M6 running to the east of the main urban area, the M62 running to the north of the main urban area, and the M56 running to the south of the area. Junctions 20, 21, 21A and 22 of the M6 all fall within Warrington. It is noted that the Lymm interchange (M6 junction 20/M56 junction 9) is located immediately adjacent to the borough boundary within Cheshire East, whilst the dumb-bell roundabout which feeds the north facing slips is located within Warrington. In addition, whilst the junction 22 roundabout sits within Warrington, the north-facing slip roads fall within St Helens. Junctions 8, 9, 10 and 11 of the M62 all sit within Warrington, as do junctions 9 and 10 of the M56.

## Key Findings

Following the review of the Warrington Proposed Submission Draft Local Plan Regulation 19 and the LTP4 consultation documents, we would draw your attention to the following key findings:

- LTP4 recognises Transport for the North's (TfN's) view that a focus on the SRN alone will not allow the North to achieve its aspiration for improved connectivity and economic growth.
- Through LTP4 Warrington's aspiration is to reduce Journey to Work mode share for drivers of cars and vans from 74% to 60% by 2041, and to increase public transport mode share to 15%, cycling to 7% and walking to 9.5%.
- Following adoption of the LTP4, more detailed studies will be undertaken to identify options for a mass transit solution to serve the strategic allocations in the emerging Local Plan.
- Warrington Borough Council (WBC) will investigate the implementation of a Workplace Parking Levy in Warrington as a way of managing demand for private car use, and of funding sustainable transport improvements.
- Opportunities for increasing the movement of goods by rail and water will also be investigated, including the potential of Port Warrington.
- The Local Plan covers the period 2017 to 2037;
- The total capacity figure for the main urban area is 13,726 new homes. This figure includes 1,200 homes at the Peel Hall site. A specific allocation for the site is included in the Draft Local Plan given its potential to impact upon both the local and strategic road network.
- It has been assumed that around 1,100 homes will be provided through Green Belt release in outlying settlements meaning that land adjacent to the main urban area needs to be found for approximately 6,000 new homes. Garden Suburb to the south east of Warrington and urban extension to the south west is the chosen option.
- Land to the east of the A50 will remain within the Green Belt, except for the parcel of land proposed for 116 ha of employment development adjacent to the M56 and M6. It is considered that more work is required to identify mitigation measures / strategic infrastructure to support this development and Highways England has signed a Statement of Common Ground (SoCG) with WBC to ensure that this site and others come forward sustainably.
- The ambitions for the Garden Suburb are to deliver between 5,000 and 7,500 new homes and an extension to the existing Appleton Thorn/Barleycastle Industrial Estate at the strategic intersection of junction 20 of the M6 and junction 9 of the M56, to provide 10,000 new jobs.
- The proposed phasing schedule for the Garden Suburb includes delivering 930 housing units and 116 ha of employment land close to junction 9 of the M56 in phase

1. Phase 2 would deliver the largest proportion of housing (2,797 units), phase 3 takes development through to the end of the Plan period (1,485 units) and phase 4: identifies development beyond the defined plan period (2,208 units).

- There is a requirement of approximately 213 ha of employment land to be provided through Green Belt release. WBC is proposing to allocate the following three additional employment areas: Port Warrington (74.36 ha); Warrington Business Hub (25.47 ha); and Garden Suburb Employment Area (116 ha).
- The northern extension of Omega has been removed from the emerging Local Plan primarily due to concerns around access and the ability of junction 8 of the M62 to accommodate further development, particularly given the proposed western extension of Omega to the south of the M62 in St Helens.
- The infrastructure schedule identifies the requirement for several SRN improvements including short-term committed Smart Motorway schemes at M62 junctions 10 to 12 and M6 junctions 21a to 26, which are fully committed schemes with completion expected during the next 5 years. Work on the M62 junction 10 to 12 Smart motorway is currently on site, with the M6 21a to 26 scheme due to follow after this.
- Further capacity and junction improvements are identified for the M62, and capacity improvements for the M6 in the short to medium term (2017-2028), although there is no information provided on the scale and type of works, indicative cost or funding source and there has been an assumption that Highways England will lead on these improvements.
- Improvements to junction 10 of the M56 in the medium term (2023-28) with an indicative cost of £10m, and improvements at junction 20 of the M6 in long term (2028-38) with an indicative cost of £50m are identified with a reference to them being subject to a Highways England study, but no further information is provided about the scale or type of works required.
- The traffic modelling evidence supplied for the consultation is limited in its detail and it is not possible to provide comments on the suitability of the background traffic growth, development trip generation or development trip distribution based upon the information supplied.
- The modelling evidence does not include any analysis of the Local Plan at an early phase, so it is not possible to judge whether the level of mitigation proposed is suitable or deliverable.
- The traffic modelling evidence completed to support the Local Plan provides little analysis of the impact on the SRN. The evidence supplied does not appear to provide a suitable baseline assessment for comparison of the Local Plan growth.
- We do not consider that the transport evidence provided at this stage is sufficient to support the proposed growth set out within the Draft Local Plan.

## **Review of Evidence Informing the LTP4**

### ***LTP4 Evidence Base Review***

The evidence review is an important part in the LTP4 development process, as it provides an opportunity to understand the existing travel patterns and reasons why people travel in Warrington. It also enables the identification of existing and future problems with Warrington's transport system. The findings of the review have helped to inform the development of LTP4 policies and enabled evidence based objective setting.

The LTP4 evidence base document provides a review of the socio-economic trends and activity, such as population, the economy, health and leisure. Travel patterns, behaviour and use within Warrington. Future growth forecasts, regeneration and development proposals, and environmental issues and considerations and the natural environment.

Pertinent to the SRN, are the key findings for transport and travel including travel patterns and trip behaviour, journey times and congestion, travel to work, car ownership, and highways accessibility and freight activity. Car travel dominates in Warrington with approximately 81% of residents having access to a car. Most commuting journeys are made by car, including to the town centre. Serious congestion issues are observed in Warrington during peak periods along Birchwood Way accessing the M6, along the A50 accessing the M6 and where the A49 joins the M62. It is noted that less than 25% of residents can access key employment sites outside the town centre (including Gemini, Omega, Daresbury, Lingley Mere and Birchwood Park) within 30 minutes using public transport. In addition, the greatest road freight flows are observed on the SRN along the M6, followed by the M62 and then the M56.

The key findings in terms of air quality and noise pollution are also pertinent to the SRN. National standards for NOx are being exceeded on the motorway network surrounding Warrington, the town centre and roads that lead into the centre. A 43% and 41% reduction is required within the motorway and town centre AQMA, respectively. Also, the first priority locations for noise action planning include junction 9 and 11 of the M62, roads on the approach to junction 9 of the M62 and the A56. Noise important areas include M62 junction 10 / junction 21A.

The key findings and implications for future growth suggest that pinch point improvements and congestion relief alone will not be enough to support the planned growth in Warrington. The Waterfront area will require new access arrangements and the Garden Suburb and South West Urban Extension will require new transport infrastructure to support the level of development proposed in these locations. A more sustainable transport strategy is also required to ensure sustainable growth at existing employment sites in the Atlantic Gateway and Cheshire Science Corridor. The Transport for the North (TfN) road study plans to upgrade and improve journey times, east-west connectivity, and safety and user experience on the M6, M62 and M56. It also notes that there is likely to be a greater number of people travelling to and from motorway access points in north, south and east Warrington.

*Highways England recognises the vital role that the SRN plays in Warrington and is aware of the significant challenges associated with not only bringing forward the targeted level of growth, but also in catering for growth associated with neighbouring authority areas and the general increase in background traffic levels on the SRN. There is likely to be a material impact on the operation of the SRN around Warrington associated with future increases in traffic. Therefore, it will be critical to identify appropriate and available strategies to cater for the targeted growth, by way of improving the accessibility and sustainability of allocation sites, and through implementation of appropriate highway infrastructure improvements.*

### **Strategic Environmental Assessment of the Warrington Draft LTP4**

This environmental report documents the Strategic Environmental Assessment (SEA) process that has been undertaken to support the preparation of the Warrington LTP4. The LTP4 sets out the vision and strategy for the long-term development of transport solutions in Warrington. It will provide the framework for how transport will support the economic, social and environmental development of Warrington over the Plan period and will replace the existing LTP3.

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects.

Scoping is the process of gathering information about the area and factors likely to be affected by the Plan. This helps to identify what the key issues are and which of these should be the focus of the SEA process. A Scoping Report was prepared and consulted upon in July and August 2018. It provided an outline of the Plan, the current and projected baseline, a contextual review of national, regional and local policies, plans and programmes, and established the key issues to form part of the SEA framework of objectives.

The appraisals identify and evaluate 'likely significant effects' on the baseline / likely future baseline associated with the draft Plan (and any reasonable alternatives), drawing on the sustainability topics and objectives as a methodological framework. We note that the following assumptions have been considered when undertaking the appraisals:

- In the absence of LTP4 there is still national and local policy, programmes and schemes, so the effects of LTP4 are predicted in the context of how it is likely to lead to more positive or negative effects when compared to a less proactive approach.
- Significant effects will only be identified if there is likely to be a tangible change to the projected baseline.

- The appraisal is focused on strategic matters, as detailed effects would be dealt with at the planning stage through appropriate assessment (e.g. Environmental Impact Assessment).
- Where routine mitigation measures could be implemented to reduce potential negative effects, this will be considered in the appraisals.

A key part of the appraisal process is to consider whether there are different ways in which the vision and objectives of the Plan can be achieved. Many policies have been developed to help deliver the vision and objectives which are not mutually exclusive strategic approaches so there are no reasonable alternatives to test. For example, policies that seek to improve safety do not have any strategic alternatives. However, there are strategic decisions to make about what transport measures to focus efforts and funding towards. Three reasonable options are identified as follows:

1. Focus on a mix of sustainable travel (walking, cycling and improvement of existing public transport networks) and traffic management measures.
2. A new mass transit system to be implemented alongside traffic management measures and sustainable travel. This would require substantial investment and may result in less investment in traffic management and sustainable travel.
3. Sole focus on sustainable modes of travel. This would involve greater investment in walking and cycling infrastructure and supporting measures.

It was found that Option 2 generated the most significant positive effects overall, as it best supports economic growth and housing development, which are critical to the emerging Local Plan. Therefore, the preferred approach is broadly reflective of Option 2, including a broad range of policy measures to deliver the vision and objectives of the Plan.

The appraisal findings of the following themes are most relevant to Highways England: Economy and Regeneration (objectives 1 and 2), Health and Well-being (objectives 3, 4 and 5), Accessibility (objective 6), Housing (objective 7) and Natural Resources (objective 9).

Overall significant positive effects are predicted for objective 1 as improvements to the transport network are critical to support a modern economy, and for objective 2 due largely to the passenger transport policies that could help improve access for disadvantaged groups. Also, a significant positive effect is predicted for objective 3 largely related to the active travel and road safety policies. A minor positive effect is predicted for objective 4 as there is no explicit goal to improve access to green infrastructure, and for objective 5 as even though there are no specific measures relating to access to health facilities, the Plan will lead to a general improvement in accessibility. A significant positive effect is predicted for objective 6 which is likely to lead to key benefits including improved access to services, support for active modes of travel, developments being well served by a range of transport modes, a modal shift to the movement of freight from roads to rail and water, and a reduction in carbon emissions. The Plan is also predicted to have significant positive effects upon housing by securing sustainable patterns of growth and movement, which are important to the delivery of new homes. The overall effect with

regards to air quality is a significant positive effect relating to the strong drive to achieve modal shift to active modes and support the encouragement for the use of public transport and the management of road networks to reduce congestion, along with cleaner / low emission vehicles.

The recommendations that have been made to improve the Plan policies include strengthening the active travel policies by identifying what types of active travel infrastructure will be encouraged. That the options exploration process for a mass rapid transit system includes an assessment of the environmental impacts to help guide the preferred approach. Freight movements on waterways are promoted as a key principle to encourage modal shift and that the passenger transport policies seek to support an increase in bus use.

*Highways England considers that an appropriate level of assessment has been carried out to support the current stage in the development process of the LTP4.*

## **Review of Warrington Fourth Local Transport Plan: Consultation Draft**

The draft LTP4 has been published for consultation alongside the Draft Local Plan. To date it has been informed by feedback from a series of transport summits that were attended by interested organisations, by comments received during the PDO consultation in Summer 2017, and by a thorough review of the transport evidence base.

WBC, as a transport authority, has a statutory duty under the Transport Act 2000, as amended by the Local Transport Act 2008, to produce a Local Transport Plan (LTP) and keep it under review. The LTP will help to address current and future local transport issues by providing a framework for decisions on future investment. It sets objectives for transport to support wider goals and ambitions, establishes policies to help achieve the objectives, and plans for implementing the policies. The vision, policies and actions identified in the Plan cover the period from its adoption to 2040.

The LTP4 has been influenced by several local and regional policies including TfN's Strategic Transport Plan which sets out the case for strategic transport infrastructure investment through to 2050. Highways England's Strategic Road Network covers just 2% of the road network in the North, but it accounts for a significant amount of traffic flow and economic value. TfN's view is that a focus on the SRN alone will not allow the North to achieve its aspiration for improved connectivity and economic growth.

A Major Road Network (MRN) for the North has been identified that connects both current economic centres and futures economic growth locations, as well as major transport hubs to enable multi-modal journeys. With local connections alongside strategic roads, it accounts for about 7% of the roads in the North. The MRN in Warrington include sections of the A49, A57, A56, A50 and A574.

Alongside the Strategic Transport Plan, TfN has published an Investment Programme which comprises TfN's advice to government on the long-term, multi-modal priorities for enhanced pan-Northern connectivity. The schemes and packages of interventions relevant to Warrington, which impact on the SRN are:

- Road Investment Strategy (RIS) 1, including M6 J22-25 & M62 J10-13 Smart Motorways;
- Warrington Western Link;
- M56 junctions 11 to 15 capacity improvement;
- M6 improvements including junctions 19 to 21A; and
- M62 junctions 5 to 10.

Within the Warrington Air Quality Action Plan, it states that actions to improve air quality by the Council within the Motorway AQMA are limited. A formal working group is to be set up between transport officers from the Council, Highways England and TfN to assess potential actions. The working group is likely to deliver this work as an agenda item within existing transport meetings.

The key challenges that need addressing through LTP4 are:

- Addressing car dependency and congestion.
- Growing bus patronage.
- Continuing the upward trend in rail use.
- Improving the walking and cycling offer.
- Improving air quality and reducing transport noise.
- Addressing transport inequalities.
- Making Warrington a more disabled friendly place.
- Supporting growth.
- Reflecting public and stakeholder views.

The vision for LTP4 is: *Warrington will be a thriving, attractive and well-connected place with popular, high quality walking, cycling, and public transport networks.* This is supported by a series of objectives as follows:

- Provide people with a choice about how they travel for each journey.
- Encourage a culture change that reduces the need for people to travel by car.
- Improve access to the town centre for all sustainable modes.
- Develop a resilient and efficient transport network that supports the town's growth.
- Reduce traffic congestion.
- Reduce emissions from transport.
- Maintain and improve all transport infrastructure.
- Encourage healthier lifestyles by increasing day-to-day activity.



- Improve safety for all highway users.
- Make Warrington a more disabled friendly place.

The following policies and actions for delivering the vision and objectives are of interest to Highways England:

- Active Travel: how we will increase walking and cycling in Warrington.
- Smarter Travel Choice: helping people choose how they travel.
- Passenger Transport: how we will improve bus, rail and taxi journeys in Warrington.
- Safer Travel: making travelling through Warrington safer.
- Freight Management: How we will support and manage freight movements.

Through LTP4 Warrington will become a place that is not dominated by car movements. The aspiration is to reduce Journey to Work mode share for drivers of cars and vans from 74% to 60% by 2041. To achieve this there is a need to facilitate significant increases in cycling to 7% mode share (approximately 2.5 times the current level), bus and local public transport use to 15% (3 times the current level) and walking to 9.5%. This aim to increase the use of sustainable modes of travel is ambitious and needs to be supported by an equally ambitious vision for transforming the transport network. The approach to delivering this change falls within four themes:

- Creating an attractive, high standard, user-friendly environment for walking and cycling trips.
- Transforming public transport by ensuring that there are attractive, frequent services that connect the places that people live and large attractors.
- Managing demand for private car use.
- Creating sufficient transport capacity on the network through major priority infrastructure projects.

Warrington are developing a Local Cycling and Walking Infrastructure Plan (LCWIP) in line with government guidance. The LCWIP sets out an aspirational core network for walking and cycling routes that includes primary routes, neighbourhood routes, and greenways. The key outputs of the LCWIP will be a network plan for walking and cycling which identifies preferred routes and core zones and a prioritised programme of infrastructure improvements for future investment. This will help to provide the right infrastructure to enable and support an increase in cycling in Warrington.

Smarter Travel Choices describes a range of approaches designed to help people to become less car dependent. The ambition is to reduce the number of car trips by providing greater awareness of sustainable travel choices. The scope includes travel plans, information and marketing, alternatives to travel (e.g. agile working), sustainable choices, training and enabling, active travel, cycling and walking, and smart and integrated ticketing.

To achieve the ambitious target to increase mode share for bus and mass transit use for journeys to work to 15%, the public transport offer in Warrington needs to be transformed.

Public transport currently available in Warrington includes express coach, local bus, rail and taxi/private hire vehicles. Future modes could include light rapid transit services such as tram/light rail or express/guided bus.

A study has been commissioned to look at options for two possible modes for a mass transit solution for Warrington: Light Rail/Tram and Bus Rapid Transit (BRT). This is in the very early stages and other modes may be considered in the process of identifying a mass transit network for Warrington. Indicatively the proposed network includes three cross-town centre routes: Lingley Mere/Omega to the proposed Garden Suburb; Daresbury to Winwick; and Birchwood to Fiddler's Ferry. It also includes two orbital routes: Birchwood to the proposed Garden Suburb; and Lingley Mere/Omega to Birchwood. The core of the proposed network would provide linkages to key transport hubs including Warrington Central, Bank Quay and the Bus Interchange. WBC proposes to carry out the optioneering, feasibility and design work in the first 5 years of the LTP4.

We welcome WBC's commitment to plan for improvements to the active travel network and to the promotion of smarter travel choices. We also support the proposal to consider options for a mass transit solution that will serve the strategic allocations for housing and employment development in the emerging Local Plan. These areas need to be well-served by sustainable modes of transport, which should be in place at the right time to serve the new residential communities and employment opportunities. Evidence has shown that trying to change people's travel behaviour once it has been established is extremely difficult. Therefore, it is necessary to plan for growth in sustainable locations that are accessible by all modes of transport.

In addition, High Speed 2 (HS2) and Northern Powerhouse Rail (NPR) offer a unique opportunity to enhance the area surrounding Bank Quay. In addition, with the newly electrified Chat Moss route, which skirts the borough to the north now providing the quickest end to end journey time between Liverpool and Manchester, there is an opportunity to review services on the Cheshire Lines Committee (CLC). WBC have been working in partnership with TfGM and Merseytravel to identify options for enhanced service patterns on the line. Some minor rail infrastructure at Birchwood station and to the west of Sankey for Penketh station could deliver benefits including the retention of 2 semi-fast services per hour along the corridor, potential to connect the Liverpool-Birchwood service to the Merseyrail network at Liverpool South Parkway and the establishment of a Warrington Metro with six trains per hour on the core section of route between Warrington West and Birchwood.

A Workplace Parking Levy is a charge on employers who provide parking to their employees. After the adoption of the LTP4, WBC will investigate the implementation of a Workplace Parking Levy in Warrington as a way of managing demand for private car use, and as a way of funding sustainable transport improvements. An outline feasibility study has estimated that it could contribute £4.8m per year for investment in sustainable transport improvements in Warrington.

To maintain and improve Warrington's networks for all modes and to incentivise the increased use of sustainable travel, a range of physical improvements will be required. Minor improvements will include pedestrian and cycling accessibility improvements, road safety and traffic management schemes, junction upgrades, bus stop improvements and priority measures, and highway maintenance programmes. Typically, these schemes will be under £2m and funded by the annual Department for Transport (DfT) Integrated Transport and Maintenance Blocks.

Major improvements will typically be large scheme infrastructure projects over £2m and will be funded from specific bids to external agencies such as DfT, Homes England, Highways England, Network Rail and Cheshire and Warrington Local Enterprise Partnership. Significant match funding is also likely to be required from WBC's capital programme and developer contributions. Schemes confirmed as funded up to 2021 include:

- M62 junction 8 improvements; and
- Warrington East Phase 3 – Dualling of A574 between M62 J11 and Moss Gate.

Under the Road Traffic Act 1988, WBC is required to prepare and carry out a programme of measures to promote road safety. Including this within the LTP helps to embed safety into broader transport schemes and encourages efficient use of resources. Safety and security for all users and all parts of the network needs to be considered including elements such as personal safety whilst waiting at bus stops or whilst cycling or walking along off-road routes.

Warrington will establish road safety as a cultural priority and work effectively with partners and stakeholders at a local and regional level to promote the Safe Systems approach. This includes increasing the safety quality of the SRN and main road network to the highest iRAP (International Road Assessment Programme) rating. The establishment of the national road safety performance framework will provide the focus for delivery and will also set interim quantitative targets to 2030 for road safety improvement. However, it is not clear at this stage when the national performance framework will be established.

Freight plays a vital role in the economic well-being of Warrington and the wider UK economy. It is essential that Warrington continues to be an attractive place for business investment, including from the freight and logistics sector. The heaviest flows of Heavy Goods Vehicles (HGVs) can be seen on the SRN and the number of Light Goods Vehicles (LGVs) on the highways network is also increasing. Nearly 80 miles of smart motorway will be built in the North West over the next five years as part of a £1.5bn investment plan by Highways England. This will provide more reliable journey times for freight operators using the SRN to access Warrington. It should be noted that other modes such as rail and water freight also play a vital role to the functioning of the regional and national economy.

Rail's modal share of Trans-Pennine freight is low and yet the M62 carries a large number of HGVs. An increase in freight paths could enable rail freight operators to operate more

freight which could remove some road movements and have a net benefit of improving journeys times. In addition, Port Warrington is a proposed tri-modal (water, rail and road) freight interchange on the Manchester Ship Canal, with a direct link to the West Coast Main Line (WCML). This facility will provide opportunities for freight to be moved by water within the North West.

*Highways England supports the Plan's vision and objectives to reduce the dominance of the car in Warrington and to promote more sustainable movements by walking, cycling and public transport. We welcome well-founded sustainable transport options for travel and encourage development in sustainable locations accessible by all modes of transport. Furthermore, we agree that the SRN alone cannot support the level of growth planned in the North and that sustainable movements of goods should be promoted. We are committed to ensuring that major roads are more dependable, durable, and most importantly – safe.*

## **Review of Evidence Informing the Local Plan**

### ***Development Options and Site Assessment Technical Report***

Given the number and nature of representations made to the PDO consultation, WBC has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan. This report covers the options assessed for the spatial strategy for the distribution of new homes, the methodology for site specific allocations for housing and employment land, the housing trajectory and the approach to development needs beyond the Plan period.

Three options for assessing the housing requirements have been defined as follows:

- Option A – minimum requirement under the Government's standard housing methodology (909 homes per annum (pa));
- Option B – housing requirements to match economic growth (945 homes pa);
- Option C – minimum requirement under the Government's standard methodology (using 2016 based household projections- 735 homes pa).

The land calculations for the three growth scenarios are set out overleaf:

	Option A Standard Methodology	Option B Economic Growth	Option C Standard Methodology (2016 base)
Annual requirement	909	945	735
2017 to 2037	18,180	18,900	14,700
Flexibility at 10%	1,818	1,890	1,470
Total requirement	19,998	20,790	16,170
Urban capacity	13,726	13,726	13,726
Green Belt requirement	6,272	7,064	2,444

To meet the requirement of paragraph 22 of the National Planning Policy Framework (NPPF) for strategic policies to look ahead over a minimum of 15 years from the date of adoption, the Plan period covers 2017 to 2037. This assumes that the Plan will be adopted in late 2020. A benchmark of 10% has been applied to provide sufficient flexibility in the context of the proposed housing land supply, which is based on the precedent set in other Local Plan examinations.

In response to representations received to the Regulation 18 consultations density assumptions used in the Strategic Housing Land Availability Assessment (SHLAA) and masterplanning work have been reviewed. This has been done to reflect recent planning permissions in the town centre for higher density residential development and WBC's commitment to optimise the use of previously developed land. A new density of 257 dwelling per hectare has been applied to sites in and around the town centre. Through this process a total capacity figure for the main urban area of 13,726 new homes has been derived. This figure includes 1,200 homes at the Peel Hall site. This site has the potential to impact upon both the local and strategic road network given the scale of development proposed and it also requires additional on-site infrastructure. As such, there is a specific allocation for the site contained within the Draft Local Plan.

*Highways England supports this approach as it will ensure sustainable development and that the required supporting infrastructure is identified and delivered in a timely manner to specifically mitigate the impact on the SRN.*

Three options for the spatial distribution of housing growth have been assessed in preparing the Proposed Submission Draft Local Plan, which relate to the distribution of housing from Green Belt release as follows:

- Option 1 – all Green Belt release accommodated adjacent to main urban area;

- Option 2 – majority of Green Belt release accommodated adjacent to main urban area with ‘incremental growth’ in outlying settlements; and
- Option 3 – Green Belt release adjacent to main urban area complemented by a sustainable extension to one or more outlying settlements and incremental growth to remaining settlements.

The spatial options for the three growth scenarios have been assessed quantitatively through the Sustainability Appraisal (SA)/SEA process. In addition, they have been assessed qualitatively against the Local Plan objectives and detailed evidence base including outputs from the Warrington Multi-Modal Transport Model (MMTM) and the Air Quality Assessment, to provide greater transparency in how the preferred growth scenario and spatial strategy has been derived. WBC considers this process to be consistent with paragraph 35 of the NPPF to provide an appropriate strategy that has considered reasonable alternatives and that is based on proportionate evidence.

Growth Scenario C is not considered to provide the basis of an appropriate strategy as it does not meet Warrington’s full development needs in accordance with paragraph 11 of the NPPF. For Growth Scenarios A and B, it is considered that Option 2 performs best against the Local Plan objectives. Following the assessment, WBC considers that Growth Scenario B provides the best strategy for the Local Plan to ensure the sustainable development of Warrington over the long term. Scenario B only represents a relatively small increase in development over Scenario A and it is considered that any additional environmental impacts can be appropriately mitigated.

Six options have been assessed to identify the most appropriate locations for development adjacent to the main urban area, as follows:

- Option 1 – Garden Suburb to the south east of Warrington of around 4,200 homes and urban extension to the south west of around 1,600 homes;
- Option 2 – Garden Suburb of around 4,200 homes and an urban extension to the west of Warrington of around 1,600 homes;
- Option 3 – Garden Suburb of around 4,200 homes and an urban extension to the north of around 1,600 homes;
- Option 4 – Garden Suburb of around 4,200 homes and dispersed Green Belt release adjacent to the main urban area;
- Option 5 – Garden Suburb of around 2,400 homes, urban extension to the south west of around 1,600 homes and dispersed Green Belt release adjacent to the main urban area; and
- Option 6 – A more dispersed pattern of Green Belt release adjacent to the main urban area.

The options are based on the revised Green Belt requirement and assumption that around 1,100 homes will be provided through Green Belt release in outlying settlements. This means that sufficient land adjacent to the main urban area needs to be found for approximately 6,000 homes.

Based on the assessment, Option 1 has been identified for inclusion in the Proposed Submission Draft Local Plan. This option performs strongly across most Local Plan objectives and is capable of meeting development needs, delivering the supporting infrastructure, and of contributing to the wider sustainable development of Warrington as a whole. Green Belt release can be facilitated without compromising the strategic importance of Warrington's Green Belt as a whole, with revised boundaries considered likely to be robust and durable beyond the Plan period. However, WBC recognise that housing delivery from these sites is unlikely within the early years of the Local Plan, given the lead in times for required infrastructure to support the two urban extensions.

A Development Framework has been prepared for the Garden Suburb. Having reviewed options for how the level of growth can best be accommodated through the preparation of the Framework and through SA/SEA, the allocation has been reduced from that proposed within the PDO with the A50 now forming the eastern extent of the site allocation. The reduced allocation can accommodate the required level of development within the Plan period and has capacity for around 2,000 homes beyond 2037.

Land to the east of the A50 will therefore remain within the Green Belt. The one exception is at the south east of the allocation where the proposed employment area includes a parcel of land to the east of the A50. This parcel has been included due to its proximity to junction 20 of the M6. It is stated that WBC has engaged with Highways England to ensure that appropriate improvements can be made to the strategic road network to support the development.

*We consider that more work is required to identify mitigation measures / strategic infrastructure to support this development and have agreed to work with WBC to ensure that the site comes forward sustainably.*

A stepped housing trajectory is proposed, which means that for the first 5 years of the Plan housing completions will be at an annual average of 847 homes per annum. This is to reflect the lead in time required to deliver essential infrastructure to support the sustainable development of the Waterfront, Garden Suburb and South West Garden Village meaning there will be relatively low levels of housing delivered in the early years. The annual average housing requirement over the remaining 15 years will therefore need to be increased to 978 homes per annum to ensure the minimum of 945 homes per annum is delivered over the Plan period.

In determining the amount of employment land needed for the Plan period, the 2019 Economic Development Needs Assessment (EDNA) update concluded that the preferred forecasting method for establishing need is a projection forward of past take-up rates that considers both strategic and local needs, resulting in a need of 362 hectares of employment land to 2037. This is proposed to be met as follows:

<b>Total Requirement</b>	<b>361.71 ha</b>
Existing supply	83.91 ha
Masterplan additional	31.46 ha
St Helens Omega Extension	31.20 ha
Green Belt requirement	215.14 ha

WBC can demonstrate a realistic supply of 83.91 hectares in the urban area, with masterplanning work supporting the potential for a further 31.46 hectares of employment primarily within and close to the town centre. Through Duty to Cooperate discussions it has been agreed that a 30-hectare extension to the west of the established Omega employment development in St Helens will count towards Warrington's employment land needs. This leaves a requirement of approximately 213 hectares to be provided through Green Belt release.

As part of the EDNA update (2019) all potential employment sites were categorised according to their feasibility, viability and deliverability as strategic and/or local employment sites. The highest performing sites for strategic and local need were categorised as 'A' and 'B' respectively, category 'C' sites were considered as reasonable, whilst category 'D' and 'E' sites were considered to be progressively constrained and to perform poorly, respectively. Each site has been assessed against SA/SEA criteria, means of access, Green Belt performance, and how they relate to the emerging Local Plan objectives and spatial strategy, including planned infrastructure.

There are enough grade 'A' sites to meet the full requirement for employment land. Following consideration of the wider site assessment criteria, WBC is proposing to allocate the following three additional employment areas:

- Port Warrington (74.36 ha) – the principle of expansion of the Port was established in the previous Plan due to the location of the site, the increase in freight on the Manchester Ship Canal and the ability to connect the ship canal to the road and rail network, The Port will form part of the wider Waterfront allocation and will be accessed by road from the Western Link.
- Warrington Business Hub (25.47 ha) – a modern business park located within the wider Waterfront allocation, benefiting from being close to Port Warrington, but also Bank Quay station and the town centre.
- Garden Suburb Employment Area (116 ha) – this is located at the junction of the M6 and M56 and will meet a large proportion of Warrington's identified B8 requirement. It will benefit from being close to the Garden Suburb and planned improvements to road infrastructure.

These sites provide a total of 215.83 ha marginally above the required need. They are broadly the same employment locations that were identified in the PDO and will require significant infrastructure improvements to the local and strategic road network. The only



grade 'A' site which has not been allocated is a northern extension to the existing Omega North site. This is primarily due to concerns around access and the ability of junction 8 of the M62 to accommodate further development, particularly given the proposed western extension of Omega to the south of the M62 in St Helens.

### ***Warrington Transport Model: Model Validation Report***

The Warrington MMTM is a 2016 based highway and public transport model, developed by AECOM on behalf of WBC. The model has been developed to assist WBC in preparing its spatial strategy for the Warrington Local Plan and for appraising a variety of transport proposals. The model has been developed using the industry standard SATURN software for the highway side and EMME software for public transport and demand modelling. The model covers the local and strategic road network within the borough of Warrington in two levels of detail. The finer detail of model covers much of the urban form of Warrington and covers the following sections of the SRN:

- M62 between, and including, junction 8 and junction 11;
- M6 between, and including, junction 22 and junction 20; and
- Junction 10 of the M56.

The second, lower, level of modelling, the extended simulation area, also covers the following parts of the SRN:

- Junction 7 of the M62;
- Junction 23 of the M6; and
- Junctions 7, 8, 9, 11 and 12 of the M56.

The model has been developed using a significant amount of traffic data, including slip road surveys at all the modelled SRN junctions and use of WebTris data for the SRN mainlines. Upon review of the presented flow calibration the model is demonstrated to calibrate well to observed traffic data, including most count sites on the SRN. It is noted that the model has a number of calibration count sites on the SRN which fall outside acceptable criteria. These include the slip roads at M62 junction 9 in the evening peak and the M6 mainline between junctions 21 and 22. The model has been validated to independent traffic counts, those not used in the matrix development process. The SRN is shown to validate reasonably well to the validation counts, noting that not all movements are subject to a validation count site, with the following notable exceptions:

- In the morning period:
  - Two approaches to M62 junctions 8;
  - The eastbound on-slip at M62 junction 9;
  - The M6 mainline between Croft and junction 22; and
  - The southbound on-slip at junction 21 of the M6.
- In the interpeak period:
  - Four sites in proximity to M62 junction 8;

- The A49 to the north of M62 junction 9;
- The M6 between Croft and junction 22;
- The southbound on-slip at junction 21 of the M6; and
- The southbound on-slip at junction 20.
- In the evening period:
  - Three sites in proximity to M62 junction 8;
  - Four sites in proximity to M62 junction 9;
  - The M62 mainline between junctions 9 and 10;
  - The northbound off-slip at M6 junction 21; and
  - One site at the Lymm Interchange.

Further to the flow validation the model has been validated to Trafficmaster journey time data for a range of routes on the local road network and the SRN. The routes on the SRN cover the M6, M62 and M56 mainlines. The local road routes include the local roads which intersect with the SRN at all modelled SRN junctions.

Highways England note that no journey time routes have been included on any of the slip roads. The model does not meet validation criteria for journey times on the SRN routes assessed. The model is not able to replicate the observed journey times on the M6 northbound and M62 westbound in the morning peak; the M6 in both directions in the inter peak period; and the M6 northbound in the evening peak.

*Of concern to Highways England is the M6 northbound validation which is three minutes too slow in the morning model and six and a half minutes too fast in the evening peak.*

*The level of flow calibration and validation across the model is of a reasonable standard, however the miscalibrations on the SRN which have been identified above should be borne in mind when the modelled forecasts are used in these areas. Likewise, reference to the mis-validation of the SRN journey times should be made in any analysis of the impact of the SRN by the Local Plan proposals. Nevertheless, the model is of an appropriate standard to be able to understand the strategic flow impacts of development proposals and is considered suitable for assessment purposes for input to localised assessment methods.*

### **Preferred Development Option: Transport Model Testing of Alternative Scenarios**

During the preparation of the PDO evidence base the Warrington MMTM was not available to test the highway impacts of the PDO. A retrospective assessment of the PDO highway impacts, using the Warrington MMTM, and the impacts of alternative land use distributions has been completed. Six alternative distribution scenarios have been tested, over the PDO scenario, summarised for residential household numbers in the table (overleaf) taken from the report.

	<b>PDO</b>	<b>S2</b>	<b>S3</b>	<b>S4</b>	<b>S5</b>	<b>S6</b>	<b>S7</b>
<b>Garden City Suburb</b>	6,324	7,324	3,198	8,000	6,324	4,000	2,293
<b>South West Warrington</b>	1,831	1,831	902	0	0	1,831	647
<b>Outlying Settlements</b>	1,190	0	4,900	1,190	1,190	1,190	1,190
<b>West Warrington</b>	0	0	0	0	2,243	2,243	1,850
<b>Urban Extension</b>	0	0	0	0	0	0	3,210
<b>Remainder</b>	15,429	15,429	15,429	15,429	15,429	15,429	15,429
<b>Total</b>	<b>24,774</b>	<b>24,584</b>	<b>24,429</b>	<b>24,619</b>	<b>25,186</b>	<b>24,693</b>	<b>24,619</b>

The overall household numbers between the scenarios differ little, with the geographic spread varying considerably. The employment allocations have remained constant between all scenarios.

The information on the forecasting assessment of the PDO in the Warrington MMTM is presented in a referenced report “Warrington Transport Model: Forecasting Report (MFR), February 2018”, this report does not form the evidence package of reports submitted for consultation and it is therefore not possible to comment upon.

Minimal detail on the adopted development trip rates have been provided in the report. It would be expected that the trip rates used be presented for review and comparison made with other developments. It would also be expected that the increase in trips in the model be presented in absolute values.

Minimal information of the distributions has been provided in the report, it would be expected that the zone to zone distribution for each development site be presented in some form, preferably in geographical illustrations.

Results from the assessments have been provided in the form of a range of network wide statistics, with no SRN specific related metrics. The network statistics on the whole predict very little difference between the assessed scenarios, suggesting that the placement of residential developments across the borough of Warrington would have similar highway impacts.

***Warrington Local Plan Testing: Transport Model Testing of the WBC Proposed Submission Draft Local Plan and Highways Schemes in the Infrastructure Delivery Plan***

The Warrington Local Plan modelling assessment, using the Warrington MMTM, is presented in the PSVLP\_Transport\_Model\_Testing report prepared by AECOM. The report provides details on the modelling methodology to assess the Local Plan proposals

and provides modelled results from three forecast scenarios, detailed below, and one base year scenario.

The report provides the same level of detail on the modelled trip rates and distributions as presented in the PDO alternative testing assessment report.

*Further evidence on the development of trip rates and distributions is required for agreement to be reached on their appropriateness. The information supplied does not provide confidence that the modelling includes sufficient levels of traffic growth associated with the Local Plan developments and therefore creates reservations over all of the modelled results presented.*

The modelling report does not provide any information of the inclusion of background traffic growth.

*Highways England would expect the model includes any committed developments, and any completed development following the 2016 data collection exercise. Furthermore, it would be expected that the model would include development consideration outside the borough of Warrington, including strategic traffic growth on the SRN. It is important for Highways England to plan for the cumulative impact of traffic growth on the SRN.*

Forecasts on committed highway infrastructure have been included in the model. Committed highway infrastructure has been identified as being that which has been built since 2016, is currently under construction, or has a funding commitment. Eighteen such schemes have been identified as replicated from Table 8 in the report below:

- Mersey Gateway Bridge;
- Great Sankey Hub junction;
- Mersey Street junction;
- Skyline Drive;
- Warrington East Phase 1;
- M62 junction 8 improvements;
- Omega Local Highway Schemes Phase 2a;
- Omega Local Highway Schemes Phase 2b;
- Centre Park Link;
- Warrington West Rail Station;
- Warrington East Phase 2;
- Local Highway Schemes Phase 1;
- Local Highway Schemes Phase 3;

- Warrington East Phase 3;
- Highway England Route Investment Programme – M62 junctions 10-12 SMP;
- Highway England Route Investment Programme – M6 junctions 21a-26 SMP;
- Highway England Route Investment Programme – M56 junctions 11a; and
- Highway England Route Investment Programme – M6 junctions 16-19 SMP.

Additional highway infrastructure measures have been identified as Development Enablers, that being that the Local Plan development is dependent on these measures. There are seven development enablers, as follows, to be delivered by 2026:

- Warrington Western Link;
- Warrington South Strategic Infrastructure – Cat and Lion Bypass;
- Warrington South Strategic Infrastructure – Wrights Green Link;
- Warrington South Strategic Infrastructure – Howshoots Link;
- Warrington South Strategic Infrastructure – Wrights Green to A50 Link;
- Parkside Link A; and
- Parkside Link B.

The report states that there may be a requirement for other potential highway mitigations as a result of the Local Plan developments and/or existing network conditions, and these are included in the IDP. It is not clear how these measures have been developed, nor how they relate to being required to delivering the Local Plan.

*Highways England would expect the transport infrastructure included within the IDP to be based upon accompanying transport evidence.*

The model has been used to test two policy interventions: a mass transit package; and a Go Dutch cycling strategy. The modelling of both measures has been completed with a large number of assumptions due to the lack of any detail on how the two measures are to be introduced. The listed assumptions into the impact of the measures on the highway network, and the influence on mode choice have been presented. Both measures are thought to be sensible approaches to reducing the reliance on the car for travelling into and around Warrington.

*Due to many unknowns over the deliverability of the schemes, and the assumptions included to model them, the results have only been considered to provide a range of possible benefits.*

Based upon the above discussed forecasting process four modelled scenarios have been presented:

- 2016 Base model;
- 2036 Scenario 1 – 2016 base with committed schemes and Local Plan Growth;
- 2036 Scenario 2 – Scenario 1 with development enabling infrastructure;
- 2036 Scenario 3 – Scenario 2 with policy interventions.

The presentation of the four scenarios does not allow for a direct comparison of the highway impacts of the Local Plan development due to a lack of a do minimum model.

*It would be expected that a base model with committed infrastructure would be included, it is therefore, not possible to form a judgement on the highway impacts of the Local Plan, ignoring our other technical concerns. Furthermore, an interim assessment has not been presented, it would be expected that an interim year assessment would be included to demonstrate the phased impact of the Local Plan and allow for the development of interventions which are required to be delivered early in the Plan period. Without this evidence it is not possible to determine if the proposed infrastructure in the IDP support the first phases of the Local Plan, nor is it possible to determine if that infrastructure is feasible or deliverable.*

The results of the modelling assessments presented in the report have been compared against the 2016 base model. This approach means that the “with Local Plan” scenarios included the impacts of the committed infrastructure. If the scheme assessment was compared against a base model with committed infrastructure it is anticipated that this would worsen the comparison of the Local Plan results.

*The results presented have little information of the Local Plans impact on the SRN, further results and analysis are required for Highways England to form a view on the predicted operation of junctions, merges, diverges and links of the SRN. This evidence should include refined methods of impact assessment, such as junction models and TD22/06 merging and diverging analysis, based upon the changes in flows predicted in the Warrington MMTM. Any completed analysis will need to be done so with recognition of the deficiencies in the base model and attempt to reflect observed flows and conditions at each assessment location.*

### **Warrington Borough Council Local Plan Air Quality Modelling**

Air quality modelling has been completed to ascertain the impact of the Local Plan proposals. The modelling has been completed based upon traffic data from the Warrington MMTM and therefore the results of the air quality modelling are subject to the concerns highlighted over the development of the Warrington MMTM forecast scenarios. It is not clear which traffic flow scenarios have been used from the Warrington MMTM for the air quality model. Due to the lack of clarity over the policy interventions it would be

preferable if the air quality modelling used traffic data from Scenario 2. The motorway AQMA has been included in the coarse air quality assessment but excluded from the detailed modelling due to the lack of receptors close to the AQMA.

*Highways England requests that the impact of the Local Plan on the motorway AQMA is provided and that any necessary mitigation measures are identified.*

The overall results from the air quality modelling completed on the urban area of the borough, illustrate that air quality is expected to improve over the Plan period due to improvements in vehicle technology, and increase fleet penetration of electric vehicles.

### **Warrington Garden Suburb Development Framework**

The Development Framework has been prepared as a record of the evidence base, engagement process and design studies that underpin the proposals within Warrington Garden Suburb (WGS), that are included within the emerging Local Plan. The document sets out the policy position and provides an overview of the spatial analysis of the area including relevant transport, planning, environmental and utilities considerations as background context for developing and testing a comprehensive framework for the WGS.

WGS forms part of the wider south Warrington area located approximately 5km to the south of Warrington town centre and it covers an area of 1,500 hectares. Its boundary is defined by Appleton and Dudlow's Green to the west, the M56 and M6 to the south and east, and Grappenhall, the A56 and the Bridgewater Canal to the north. It is largely Green Belt consisting of agricultural land with some residential neighbourhoods and employment dispersed throughout the area.

The aim and primary objectives of the framework are to:

- Define the scale and type of development to come forward within the area;
- Define the social, physical and transport infrastructure required to support development;
- Provide a vehicle for consensus building and implementation;
- Support and integrate it with the review of the Local Plan;
- Demonstrate deliverability of the scheme; and
- Understand the existing character and minimise impact.

The ambitions for the WGS are to deliver a major new urban extension of between 5,000 and 7,500 new homes within three neighbourhoods surrounding a new neighbourhood centre with retail, health and leisure facilities, and a new Country Park. A major new employment area is also proposed as an extension to the existing Appleton Thorn/Barleycastle Industrial Estate at the strategic intersection of the M6 and M56, to provide 10,000 new jobs. Walking, cycling and public transport linkages will connect the neighbourhoods to local and neighbourhood centres, the new employment area and the

town centre. In addition, an extensive green network will connect the WGS with links to the wider green infrastructure network. These ambitions are aligned with the vision for the emerging Local Plan for Warrington.

WBC received over 45 submissions to the 'call for sites' within the WGS area from both public and private sector landowners and developers. These, with sites from the Green Belt Site Selection and SHLAA Green Belt Site Proformas have been considered in developing the Framework.

It is stated that the Green Belt Assessment undertaken by Arup in 2016 has informed the design and delivery strategy for the WGS. Most of the identified sites were considered to make a moderate to low contribution to the Green Belt. As such, sites making a weak contribution have been prioritised to be delivered in the early stages, sites making a moderate contribution will be delivered in a variety of phases and those sites making a strong contribution, located mainly in the north-eastern part of the WGS, will be kept untouched as Green Belt within the Plan period.

Within the local context section, a review of the vehicular movements network is provided. This states that WGS is well connected by road being adjacent to the M56/M6 interchange junctions, and with London Road (A49) and Knutsford Road (A50) providing the north-south connections from WGS to the town centre. As the area is predominantly farmland, WGS currently has a small number of bus routes serving the local and wider area. It is stated that a fundamental upgrade of the existing vehicular movement network is required to support the scale of development proposed in the WGS, and where possible this should use the existing road infrastructure. However, new road infrastructure will be required to connect proposed developments and will be phased accordingly.

A review of the non-vehicular movements is also provided. Two existing strategic long-distance trails run along the northern extent of the WGS; the Trans Pennine Trail – which runs alongside the Manchester Ship Canal and cuts through the northern corner of the site via a disused railway, and the Mersey Valley Trail which overlaps with the Cheshire Ring Canal Walk – running along the northern boundary of the site, mainly alongside the northern side of the Bridgewater Canal. There are also several existing Public Right of Way (PRoW) within the surrounding WGS including in Dudlow Green, Grappenhall and Appleton Thorn. It is stated that these established routes should be recognised and reinforced as part of the Framework.

The Framework identifies the overarching opportunities to support the WGS as improving the existing transport network to provide better links with the town centre, incorporating sustainable modes of travel, providing better public transport and non-vehicular links, and integrating the proposed infrastructure network with the transportation and green corridors.



*Highways England acknowledges their attendance at a vision workshop in May 2018 where the general background to the WGS was discussed, along with Local Plan progress, market constraints and the technical baseline. At the session, issues relating to connectivity by public transport, walking and cycling, and air quality and physical constraints were discussed and considered. Three concept options were also presented with Option B being considered as the preferred approach. We note that following the workshop, Option B has been further refined and tested against physical constraints and trajectory requirements and has been subject to further consultation with major developers and landowners with interests in WGS.*

The Framework structure has been developed to incorporate an enhanced vehicular movement network through a series of new and upgraded routes. These improvements will be phased over time in response to the development trajectory to link new and existing communities. The overall objective is to use this network to improve the linkages to the town centre, particularly through an enhanced public transport network that aims to generate greater patronage on the routes thereby making them commercially viable for public transport operators. The primary loop is seen as the principal public transport corridor linking back to Warrington via the A49 and A50.

The proposed non-vehicular network will build on established footpaths and cycle/bridleways to ensure that these routes integrate with proposed green infrastructure to improve accessibility by walking and cycling within attractive car-free environments. Cycle routes will also sit alongside new/ upgraded vehicular routes and provide viable alternatives to connect to the town centre and public transport hubs.

The final land use that has emerged through the design, development and engagement process is shown in the table overleaf:

Land Use	Hectares (Ha)	Potential no. of dwellings	Employment footprint
Neighbourhood Centre	19		
Employment Land	116		406,000 sq m (based on 35% of land area)
Residential	351.3	7,419 (including 930 Homes England units)	
3 Village Centres	6.9		
Country Park	89		
Proposed Strategic Road	14.7		
Green Belt and Open Countryside	622.5		
<b>Total</b>	<b>1237.6</b>		

The proposed infrastructure includes a conceptual arrangement for the strategic movement corridors. These have been developed through a series of workshops with WBC's Transport Team. The Framework states that from the outset one of the primary determining factors has been to future proof a new network that can evolve as the WGS matures and grows. It was also important for the network to perform a multi-functional role and has therefore been developed as a series of 40m wide corridors that are able to accommodate a range of functions including: vehicular lanes, cycle and footpaths (separated from general traffic where possible), bus routes, green verges/ landscape buffers in addition to primary utility corridors. The 40m width also generates a built-in flexibility to the plans allowing roads and other elements to deviate within the zone in response to detailed design considerations.

There is a proposed phasing schedule set out within the framework. Phase 1 incorporates three non-Green Belt sites within Villages A and B and will deliver 930 housing units. Alongside the new homes approximately 116 ha of new employment land could be delivered close to junction 9 of the M56. Enabling infrastructure including new strategic movement and utilities corridors will also be required. Phase 2 could deliver the largest proportion of housing (2,797 units), over three of the four villages and new strategic movement and utilities corridors will create east/west linkage between the A49 and A50. By the end of phase 2 all primary infrastructure/movement corridors will have been created. Phase 3 takes development through to the end of the Plan period (1,485 units). Phase 4: identifies development beyond the defined Plan period through new areas of residential development (2,208 units) along the new east-west corridor and along the WGS northern edge, adjacent to the Bridgewater Canal.

*Highways England note that there is no reference within the placemaking principles to acknowledge the role the SRN will play within the WGS area or any mitigation measures that may be required to support its sustainable development and delivery. We consider that further work is required to understand the impact of the WGS on the SRN, particularly in relation to the trips associated with the new residential and employment areas. We consider that development within the WGS needs to be accessible by all modes of transport, which means the need for significant investment in public/active travel in the area. Proposed development cannot merely be reliant on existing capacity on the SRN.*

*Highways England has previously raised concerns with WBC about a piecemeal approach to development, which would result in the loss of investment in and/or delivery of strategic mitigation to address the likely impact of significant trips on the SRN associated with development in the WGS. Delivering development without any evidence supporting the need for a significant investment in infrastructure in this area could result in independent piecemeal mitigation being delivered. This will only address the impacts of individual developments, rather than contributing towards longer-term mitigation to offset the impact of cumulative development.*

*Transport evidence needs to demonstrate that the WGS is accessible by all modes of transport, identify what infrastructure will support the phased delivery of growth in this area and that it is sufficient to mitigate the impact of forecast demand and satisfy our concerns over future impacts on the safe and efficient operation of the SRN.*

### **Infrastructure Delivery Plan 2019**

The IDP forms part of the evidence base supporting and underpinning Warrington's Proposed Submission Draft Local Plan. It aims to aid all parties in identifying and prioritising infrastructure provision as part of an integrated approach to planning and infrastructure development. The Local Plan aims to set out Warrington's infrastructure requirements within the Borough up to 2037 and the IDP is an essential mechanism for helping to identify funding priorities and gaps. It is a 'live' document and will be reviewed and monitored regularly to ensure it includes the most up to date information. Any identified costs are based on the best available information at the time of publication and will be subject to change during the plan period.

The IDP schedule details the projects required to support the delivery of the emerging Local Plan. It also demonstrates the extensive list of internal and external infrastructure providers that have been consulted in relation to the delivery of proposals within the Proposed Submission Draft Local Plan. A plan-wide Viability Assessment has also been undertaken and this demonstrates that the delivery of necessary infrastructure to support the levels of development proposed is viable and deliverable over the Plan period. This involved engagement with developers on infrastructure requirements and costs for sites proposed for development in the Plan.

The main development areas require extensive infrastructure to support their development. WBC has identified the strategic infrastructure requirements of these allocations – over and above standard on-site infrastructure and S106 planning obligations – and included these in the Viability Assessment as a per dwelling cost.

For the Garden Suburb, WBC is proposing to facilitate the forward funding of key infrastructure requirements. For the Viability Assessment, the strategic infrastructure cost for residential development has been set at £18,500 per dwelling in the first year of the development. This figure has been assessed using current estimates for the delivery of infrastructure in accordance with the IDP, assumed S106 contributions and the cost of advanced funding. Against this WBC has set an external public sector funding requirement.

*Highways England note that the funding to meet this requirement has not been confirmed at this stage and that the financing to support this enabling infrastructure is the subject of ongoing discussions.*

*The infrastructure schedule identifies the requirement for several SRN improvements including short-term committed Smart Motorway schemes at M62 junctions 10 to 12 and M6 junctions 21a to 26, which are fully committed schemes with completion expected during the next 5 years. Work on the M62 junctions 10 to 12 Smart motorway is currently on site, with the M6 21a to 26 scheme due to follow after this.*

*It also identifies the need for further capacity and junction improvements on the M62 and capacity improvements on the M6 in the short to medium term (2017-2028), although there is no information provided in relation to the indicative cost or funding source and there appears to be an assumption that Highways England will lead on these improvements.*

*In addition, it identifies the requirement for improvements to junction 10 of the M56 in the medium term (2023-28) at an indicative cost of £10m, of which there is currently no funding secured. There is a reference to these being the subject of a Highways England study. Also included and noted as the subject of a Highways England study is improvements at junction 20 of the M6 in long term (2028-38) with an indicative cost of £50m with no commitments to funding. Highways England commissioned studies on the SRN to identify any issues and concerns in relation to the current operation of the network. This is to help enable us to target investment for future schemes through long-term investment plans such as the RIS. It should be noted that the studies do not form a commitment by Highways England to deliver improvements at these specific locations.*

*Highways England also note that no cycling and walking infrastructure is labelled as committed or funded, despite strategic cycling corridors being required in the short term. Also, the only public transport commitment is Warrington West rail station, which is fully funded and on site with completion expected late 2019. No other public transport infrastructure is committed or funded, despite bus corridor improvements also being required in the short term.*

*Whilst we have acknowledged that WBC is in ongoing discussions for the provision of strategic infrastructure, particularly to support the strategic allocations, we consider that there should be more certainty regarding the infrastructure required to support development in the short term. This includes the indicative cost, funding sources and when it will be delivered and by whom.*

### **Sustainability Appraisal**

The Sustainability Appraisal (SA) process began with a Scoping Report that was prepared and published for consultation in October 2016. Following consideration of the comments received, the scope of the SA was determined and has provided the baseline position against which appraisals have been undertaken. The SA has been updated throughout the plan making process.

An appraisal of the plan policies has been undertaken against the SA Framework. Effects have been identified taking into consideration a range of characteristics including: magnitude, duration, frequency and likelihood. This has helped to determine the significance of effects and whether these are positive or negative. The findings have been present for each SA topic area, of which the air quality and accessibility topics are of most relevance to Highways England.

For air quality, the SA has identified that in combination the delivery of housing and employment space will lead to additional car trips, many of which would contribute to congestion at motorway junctions and connecting roads. However, it is considered that as the Plan also promotes active and sustainable modes of travel as well as local accessibility to services, facilities, jobs and recreation, this will help reduce the effects on air quality. The emphasis on sustainable modes of travel and green infrastructure enhancement whilst positive are not likely to have significant effects. Potential for notable benefits is thought to come from support for strategic infrastructure improvements such as the requirement to contribute to motorway junction improvements and the Western Link; which could help to divert traffic and tackle congestion. Overall only minor negative effects are predicted with more neutral effects expected in the longer term.

The SA has identified that the draft Plan is likely to have a minor effect on the baseline position for accessibility. The strategy and supporting allocations direct growth mainly to the urban areas of Warrington, which have better accessibility than smaller villages, and will help to reduce the need to travel to access services, goods and employment. The strategic allocations are located on the urban fringes that are currently poorly served by public transport and may give rise to additional traffic heading towards the main urban area. However, key infrastructure improvements are required before development can commence, such as the strategic routes through the WGS supporting new public transport links to the town centre – a potential mass transit solution is being explored through the LTP4. The Plan also seeks to achieve increased use of sustainable modes of travel by protecting and enhancing sustainable transport and active travel networks. It is considered that these measures could help to achieve significant positive effects in the

longer term, but it is acknowledged that there is a level of uncertainty. Furthermore, not all communities may benefit from improvements and there will also be short term disruption to the road networks because of infrastructure improvements so there are likely to be some negative effects experienced.

*No mitigation and enhancement measures are proposed for the air quality and accessibility topics based on the findings of the appraisal. In addition, Highways England consider the proposed monitoring measures for these two topic areas to be appropriate to understand the impact of the Local Plan. Overall, Highways England consider that an appropriately detailed SA has been carried out for this stage in the plan making process.*

## **Review of Warrington Proposed Submission Draft Local Plan**

The Draft Local Plan sets out strategic objectives for Warrington; objectives W1 and W4 continue to seek to develop strategic infrastructure, reduce congestion and promote sustainable modes of transport and active travel options. The objectives have been updated to reflect the higher level of development proposed to meet future needs and the changes to NPPF (2019).

*Highways England welcome and support these strategic objectives and guiding principles for the Plan.*

The spatial strategy's main priority is to optimise the development potential of the existing urban area. As such, several key elements from the PDO remain, including intensifying development in the town centre and inner area of Warrington and opening up the Waterfront as a new urban quarter facilitated by the Western Link. However, it is acknowledged that not all of Warrington's needs can be met within the existing urban area, which can accommodate around 13,700 new homes. This means the requirement for the remaining 7,000 homes will have to be facilitated through the release of Green Belt land.

A range of options were considered for the distribution of new homes from Green Belt release. The chosen spatial strategy is for a Garden Suburb to the south east of the main urban area that will deliver 5,000 new homes (including 4,200 through Green Belt release) to 2037 facilitated by internal roads and a strategic link, with the potential for a further 2,300 new homes from Green Belt release beyond the Plan period. An urban extension to the south west of the main urban area for around 1,600 homes facilitated by the Western Link, and incremental growth across outlying settlements of approximately 1,100 new homes.

As with housing, it is not possible to meet all the employment land need within the existing urban area, which means there is a requirement for 21.5 hectares of employment land through Green Belt release. A range of options were also considered for employment and the main employment sites have been allocated at Port Warrington, Waterfront Business Hub, Garden Suburb Employment Area and Omega Westward Extension in St Helens. Sites to the north of junction 8 and 9 of the M62 were discounted due to highway concerns and ecological impacts. No further sites have been identified for safeguarding beyond the Plan period, as the potential of Fiddlers Ferry Power Station is not included within the employment land supply at this stage but will likely contribute to meeting longer term need.

This would equate to 11% of Warrington's Green Belt area being released. Much of this will be adjacent to the M6 and M56.

*Highways England supports development in the most accessible and sustainable locations and expects transport evidence to identify potential impacts from cumulative development upon the SRN around Warrington. This is required to enable appropriate mitigation measures and strategic infrastructure to be identified and phased accordingly to support sustainable development in Warrington. Highways England has previously raised concerns regarding the impact of proposed infrastructure such as the Western Link and the fact that site allocations and mitigation were being proposed without a wider understanding of the cumulative transport impacts. Following our review of the Local Plan transport modelling evidence, our concerns remain as the evidence has not considered the impact of planned growth in Warrington on the SRN. Therefore, it is not possible to understand if the proposed mitigation will address the impacts upon the future safe and efficient operation of the SRN in Warrington.*

*The Draft Local Plan includes high level proposals for motorway junction upgrades at M56 junction 10, M6 junction 20 and M6 junction 21a, although no plans or descriptions are provided. A robust evidence base will be required to demonstrate the need for junction improvements and if required, to allow Highways England and WBC to work together to identify schemes that are feasible in terms of construction, finance and deliverability. This should not be taken as acknowledgement that Highways England will finance schemes and any scheme delivery would require our prior agreement.*

It is noted that to fully achieve the Draft Local Plan, Green Belt release and investment in strategic infrastructure is required. As set out in Policy DEV1 – Housing Delivery, WBC is proposing a stepped housing trajectory with relatively lower levels of housing (847 homes pa) delivered in the first 5 years of the Plan period to allow for key enabling infrastructure to be delivered. Housing will then be delivered at a higher rate (978 homes pa) over the next ten years of the Plan period. It will be crucial that phased delivery of identified infrastructure is optimised to allow for growth but without significantly impacting upon the SRN.

*In this respect, Highways England welcome the need for an individual site assessment of local transport impacts for major warehousing and distribution developments in Policy DEV4 – Economic Growth and Development. This is required to identify mitigation required to offset the impact of development in addition to the need for strategic infrastructure.*

*Highways England consider the absence of detailed evidence of proposed infrastructure improvements and associated impacts in relation to the future operation of the SRN should be rectified as soon as possible and have shared these thoughts with WBC through our Duty to Cooperate meetings. We are committed to working with WBC to ensure that the Plan can be delivered sustainably in relation to strategic transport requirements. We also acknowledge the removal of the employment site that would have formed an extension to Omega north of junction 8 of the M62 as a result of concerns relating to the capacity of the junction to accommodate trips associated with further development.*

Policy INF1 – Sustainable Travel and Transport aims to improve the safety and efficiency of the transport network, tackle congestion and improve air quality, promote sustainable transport options and reduce the need to travel by private car. Its general principles include building in sustainable and accessible locations, or in locations that can be made sustainable and accessible, with priority given to walking, cycling and public transport. Furthermore, this policy aims to mitigate the impact or improve the performance of the transport network, including the SRN, by delivering site specific infrastructure to support the proposed level of development. This includes improving and developing appropriate road, rail and water freight transport routes and facilities to assist in the sustainable and efficient movement of goods. It also commits to considering the impacts of development on the wider region's SRN and to work with neighbouring authorities and wider stakeholders to assess transport initiatives, where impacts have been identified and need to be mitigated.

*Highways England supports this policy to encourage modal shift to more sustainable modes of travel for local trips around Warrington and the wider urban area. We also welcome the inclusion of the recognition for schemes to mitigate impacts and to help improve the performance of the SRN. Planned growth cannot simply be reliant on the available capacity on the SRN for future access and travel needs and we support well-founded sustainable transport schemes within the Local Plan. We also welcome point 7, which requires major developments likely to generate significant movements to be accompanied by a Transport Assessment and a Travel Plan.*

*We note that provision for the safeguarding of land for transport schemes is made in Policy INF2 – Transport Safeguarding. It includes provision for the Bridgefoot Link, a new or replacement high-level crossing of the Manchester Ship Canal in Latchford, Warrington East Multi-Modal Corridor improvement and the Western Link. It states that these and*



*additional schemes will be tested using the Warrington MMTM and that if additional land requirements are identified these will be safeguarded in a future review of the Local Plan.*

Development will also be required to provide or contribute towards the provision of infrastructure needed to support it and Policy INF5 – Delivering Infrastructure sets out the principles for how this will be sought, for example through planning obligations, and when the infrastructure must be operational. This includes transport improvements such as walking and cycling facilities. It also sets out the circumstances where WBC will consider the viability of development proposals at the planning application stage.

Movement and access are key parts of the design process and for the achievement of sustainable development.

*Highways England welcome the principles for movement and accessibility set out in Policy DC8 – Quality of Place to ensure developments promote sustainable methods of transport including walking, cycling and public transport.*

Developments are expected to be designed so that they are not dominated by vehicular access and car parking. Designs should be inclusive and accessible to all and promote permeability by creating places that are connected and easy to move through.

*We support Policy ENV8 – Environmental and Amenity Protection which seeks to ensure that new development will not have an unacceptable negative impact on air quality, and that it will not further exacerbate air quality in the existing AQMAs or contribute to air pollution in areas that may result in further areas being designated as AQMAs.*

Policy MD2 – Warrington Garden Suburb sets out a comprehensive package of transport improvements that will be required to support the sustainable delivery of approximately 5,100 new homes and 116 of employment land within the Plan period. This includes improved walking and cycling routes, public transport enhancements, a new strategic link to connect the Garden Suburb with the A49 and A50, and capacity improvements at junctions 9 and 10 of the M56 and junction 20 of the M6 and other network improvements as identified by an appropriate Transport Assessment. A Development Framework will be prepared as a Supplementary Planning Document (SPD) for the Garden Suburb and will include more detailed masterplans for each of the three Garden Villages and the Neighbourhood Centre, together with a delivery strategy and phasing plan to ensure comprehensive and coordinated delivery.

The first phase of residential development will comprise of Homes England sites at Grappenhall Hayes, Appleton Cross and Pewterspear with extant planning permission. No further residential development will be permitted until the funding and programme for

the delivery of the strategic link to connect the Garden suburb to the local and strategic road networks has been confirmed. In addition, new employment development will not be permitted until the funding and programme for the delivery of the improvements at junction 9 of the M56 and junction 20 of the M6 have been agreed with key stakeholders including Highways England and the Local Highway Authority.

Policy MD3 – South West Urban Extension is allocated approximately 112 hectares of land for the delivery of around 1,600 new homes. It states that a masterplan will need to be prepared for the urban extension together with a delivery strategy and phasing plan to ensure the comprehensive and coordinated development. The development will be expected to improve cycling and walking routes, provide public transport enhancements and make a proportionate contribution towards the delivery of the Western Link Road. Development cannot come forward until the funding and programme for the delivery of the Western Link has been confirmed. This means the first homes are anticipated to be completed by 2023/24, with the urban extension completed in full by the end of the Plan period.

Policy MD4 – Land at Peel Hall allocates 69 hectares of land for a new sustainable community of approximately 1,200 new homes. This will be supported by junction improvements and new highway connections linking the development to the local road network, and highway works to the SRN, as agreed by the Council and Highways England. It will also be expected to provide bus priority features such as bus gates to support efficient services and public transport enhancements and an internal cycling and walking network to improve accessibility by active modes and any other network improvements identified in an appropriate Transport Assessment. A detailed masterplan will be required for the development of the site, together with a delivery strategy and phasing plan to ensure the comprehensive and coordinated delivery of the site. In addition, a Transport Steering Group will be required to coordinate the efficient delivery of sustainable transport measures and to ensure the required network efficiency and safety measures on the wider network are delivered as and when appropriate.

*Highways England support the approach set out for delivering site allocations in Policies MD2, MD3 and MD4, as this will ensure that alternative sustainable transport options are made available in the right place at the right time to cater for local trips and forecast demand associated with planned development. We also welcome the requirement for development frameworks and masterplans along with delivery strategies to ensure that sites are brought forward in a comprehensive and coordinated manner and that the required strategic infrastructure is in place to support the sustainable delivery of planned growth.*

*Highways England recognise that a key element of identified assessment work was to test the proposed site allocations through the updated Warrington MMTM. This has enabled the Council to consider transport impacts arising from new development, particularly for the local highway network. However, a robust transport evidence base*

*would include an assessment of the impact of the Local Plan upon the SRN to ensure that appropriate mitigation measures are proposed and delivered to support sustainable development.*

*Highways England do not consider the transport evidence at this stage is robust and we would welcome the opportunity to continue to work with the Council to ensure the plan is supported by a robust transport evidence. The transport evidence base must be sufficient, demonstrate that there are no issues that impact upon the deliverability of the plan and facilitate the growth aims as much as possible. As such, there also needs to be an emphasis on recognising the deliverability (in both engineering and funding terms) of mitigating infrastructure-based measures that are being proposed.*

## **Conclusion**

The Localism Act 2011 placed the responsibility of 'Duty to Cooperate' on local authorities, to ensure that any local or cross-boundary impacts have been fully considered and addressed appropriately in preparing the Local Plan. The local authority must demonstrate that they have discussed such matters with the relevant bodies, including Highways England.

Highways England note that the Warrington Proposed Submission Draft Local Plan is at an advanced stage and is the version of the plan the Council intends to submit for examination and then adopt.

According to NPPG an assessment of the transport implications should be undertaken at several stages in preparing the Local Plan. It should be an iterative process that becomes more refined through the process itself and ultimately shaping its development, rather than this being collected retrospectively and trying to retrofit it to the development strategy.

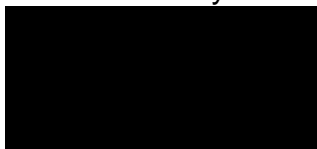
We request that we be notified of any of the following:

- The Draft Local Plan has been submitted for Independent Examination by a Planning Inspector;
- The publication of the recommendations of any person (i.e. the Planning Inspector) appointed to carry out an independent examination of the Draft Local Plan; and
- The adoption of the Local Plan.

It is recommended that growth is planned in sustainable locations that can be accessed by non-car modes of transport. Highways England supports this view as planned growth cannot simply be reliant on the availability of capacity on the SRN for future access and travel needs, particularly for local trips. We would welcome continued dialogue with WBC to ensure that the transport impacts of strategic areas for growth are appropriately assessed and considered in respect of the SRN. Also, to ensure that alternative sustainable transport options are made available in the right place at the right time to cater for local trips and forecast demand associated with planned development.

We welcome the inclusion of well-founded, sustainable transport schemes in the Local Plan, and would like to continue working collaboratively with Warrington Borough Council to understand the impact of both the proposed highway and public transport schemes on the future efficient and safe operation of the Strategic Road Network, and their ability to support planned growth in the area to 2037 and beyond.

Yours faithfully



Benjamin Laverick  
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