



Dear Sir / Madam

Please find attached Highways England's formal response to the Warrington Borough Council Preferred Development Option Consultation.

Following the review of the Warrington Local Plan Preferred Development Option (WLP PDO) and Warrington Transport Summary (WTS), I have laid out the key findings and recommendations below

:

- There is currently a high reliance on the private car for journeys to work generated by the Warrington area, with a risk that this existing behaviour will continue into the future;
- The Call for Sites process is at a very early stage with limited supporting transport evidence available for comment;
- The WLP PDO proposes a significant amount of new development within existing designated Green Belt peripheral to the existing urban form; these sites by their very nature are not currently the most accessible, and further work will be required to improve the sustainability of these locations;
- The documents acknowledge that there is a need for significant investment in infrastructure in Warrington. The documents identify high level proposals for highway improvements including motorway junction upgrades at M56 Junction 10, M6 Junction 20 and M6 Junction 21A. However, no detail is provided in terms of any proposals, and further assessments and evidence will be required to support any proposed improvements;
- A robust evidence base will be required to demonstrate the need for junction improvements. Providing this evidence base will enable Highways England and the Council 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 the schemes and any scheme delivery would require prior agreement with Highways England;
- The proposed new Western Link infrastructure (to which Highways England have already provided a separate consultation response) could lead to a level of traffic redistribution around Warrington with some impacts for the SRN, and requires further detailed assessment as part of a wider package of potential highway infrastructure improvements;
- A comprehensive and transparent cumulative assessment of the growth proposed in the WLP PDO (along with growth from neighbouring areas and agreed sites) is required, to enable Warrington Borough Council and Highways England to understand the traffic impacts upon the local and strategic road networks. Early traffic modelling work undertaken on behalf of Highways England has indicated material impacts on the operation of the SRN around Warrington associated with future increases in traffic. Further work will be required in parallel to the ongoing development of Warrington Borough Council's Warrington Multi-Modal Transport Model to substantiate

quickest and simplest method for submitting your comments.

Regards,

Planning Policy & Programmes Team.

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27 September 2017

Dear Sir / Madam

WARRINGTON BOROUGH COUNCIL LOCAL PLAN PREFERRED DEVELOPMENT OPTION CONSULTATION

As a statutory consultee in the planning system, Highways England has a regulatory duty to co-operate. Whilst Highways England are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses, our desire to be a proactive planning partner goes beyond this statutory role, but follows the spirit of the Licence which stipulates 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 Local Plan Preferred Development Option (WLP PDO) and the Warrington Transport Summary 2017 (WTS), particularly focusing on the potential for impact upon the safety and operation of the SRN in the Warrington area.

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 the Warrington, as do Junctions 9 and 10 of the M56.

Key Findings

Following the review of the WLP PDO and WTS, we would draw attention to the following key findings and recommendations:

- There is currently a high reliance on the private car for journeys to work generated by the Warrington area, with a risk that this existing behaviour will continue into the future;
- The Call for Sites process is at a very early stage with limited supporting transport evidence available for comment;
- The WLP PDO proposes a significant amount of new development within existing designated Green Belt peripheral to the existing urban form; these sites by their very nature are not currently the most accessible, and further work will be required to improve the sustainability of these locations;
- The documents acknowledge that there is a need for significant investment in infrastructure in Warrington. The documents identify high level proposals for highway improvements including motorway junction upgrades at M56 Junction 10, M6 Junction 20 and M6 Junction 21A. However, no detail is provided in terms of any proposals, and further assessments and evidence will be required to support any proposed improvements;
- A robust evidence base will be required to demonstrate the need for junction improvements. Providing this evidence base will enable Highways England and the Council 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 the schemes and any scheme delivery would require prior agreement with Highways England;
- The proposed new Western Link infrastructure (to which Highways England have already provided a separate consultation response) could lead to a level of traffic redistribution around Warrington with some impacts for the SRN, and requires further detailed assessment as part of a wider package of potential highway infrastructure improvements;
- A comprehensive and transparent cumulative assessment of the growth proposed in the WLP PDO (along with growth from neighbouring areas and agreed sites) is required, to enable Warrington Borough Council and Highways England to understand the traffic impacts upon the local and strategic road networks. Early traffic modelling work undertaken on behalf of Highways England has indicated material impacts on the operation of the SRN around Warrington associated with future increases in traffic. Further work will be required in parallel to the ongoing development of Warrington Borough Council's Warrington Multi-Modal Transport Model to substantiate potential SRN impacts and to identify appropriate strategies to cater for the targeted growth;
- It is recommended that the transport evidence should include a phasing strategy that links development thresholds to associated highway impacts and mitigation strategies. The strategy should identify measures that can be put forward in the short-term to address identified highway impacts, and in the longer-term, identify the point in time that improvements are required to be implemented in order to support the ambitious growth targets set out in the plan; and
- Highways England would welcome the opportunity to continue to work with Warrington Borough Council to ensure that the Draft Local Plan is supported by a robust transport evidence base, and would welcome the opportunity to engage in

ongoing collaborative working relations to support Warrington Borough Council's growth ambitions.

Background

Prior to the current round of public consultation, the Council undertook a 6-week period of consultation on the scope and contents of the Local Plan review and the Council's initial Local Plan evidence base between October and December 2016. The Council received a total of 78 responses from developers, landowners, Parish Councils, local residents and other stakeholders. At the same time as the public consultation process, the Council also invited developers, landowners, the local community and other stakeholders to submit sites they wanted to be considered as part of the plan review. The Council received over 150 submissions for its Local Plan 'Call for Sites'.

At present, the Council are consulting on the WLP PDO which sets out the proposed approach to addressing Warrington's need for new homes and jobs up to 2037. It also identifies that significant investment in infrastructure is required to ensure that Warrington's growth is sustainable.

As part of the WLP PDO, broad locations for potential development have been identified based on the revised aims and objectives of the Local Plan review and an assessment of the spatial distribution of development.

The responses to the WLP PDO consultation will then inform the next stage of the Local Plan process; preparation of the Draft Local Plan. The Draft Local Plan will be the formal plan that Warrington Borough Council will publish for consultation and subsequent independent examination (currently timetabled for 2018).

Warrington Borough Council has also recently consulted on a new Western Link highway scheme, providing an alternative access route to the west of the town centre. The new crossing would increase route options for crossing the River Mersey and Ship Canal and thereby enhance network resilience. Nevertheless, the scheme has the potential to lead to a level of traffic redistribution around Warrington, and the results of future traffic modelling will need to be reviewed to determine any potential impact upon the SRN. It was recommended that Highways England request ongoing engagement with Warrington Borough Council regarding not only the Western Link proposals but also wider infrastructure proposals to support Local Plan growth, and to work collaboratively with the local authority to understand the impacts of growth and the potential infrastructure proposals.

Warrington Transport Summary 2017

Warrington Borough Council have undertaken an initial overview assessment of transport provision and needs in Warrington to identify existing problems and opportunities for improvement. This is presented in the Warrington Transport Summary (WTS) and forms one element of the suite of documents supporting the Local Plan review.

Pertinent to the SRN, the WTS presents a summary of Warrington's population profile, car ownership, travel to work flows (including cross-boundary movements), mode share

distance travelled, vehicular speeds and highway accessibility. In a broad summary of current highways issues, it is stated that congestion at motorway junctions (unnamed) impacts upon journey times and journey reliability on the highway network. Additionally, the SRN was reported to act as a barrier to public transport. In terms of highway opportunities, the Council state that there have been reported improvements in KSI numbers in recent times.

The WTS recognises that excellent accessibility to the SRN means most of Merseyside, Greater Manchester and Cheshire all fall within a 60-minute drive from Warrington. It is also noted that car ownership and reliance on the car for journeys to work is above the national average. For these reasons, it is recommended that Warrington Borough Council should undertake further work to plan for sustainable growth in locations that can be accessed by non-car modes of transport, and which are not simply reliant on the availability of capacity on the SRN for future access and travel needs.

Warrington Local Plan Preferred Development Option

Responding to Scope and Contents Consultation

Highways England has previously submitted a response to the Strategic Housing Land Availability Assessment (SHLAA) consultation and has no further comments on the approach discussed. We recognise the Council's 'Duty to Cooperate' process and acknowledge the discussions held to date. Nevertheless, Highways England would welcome continued engagement to understand the potential impacts of the WLP PDO on their infrastructure and business planning and to help identify any mitigation measures that may be required.

Call for Sites

Under its licence from the Department for Transport (DfT), Highways England is tasked with working with Councils and other bodies such as Local Enterprise Partnerships, the Homes and Communities Agency and developers to realise and maximise the growth in employment and housing whilst balancing the impact upon, and the needs of the wider users of, the SRN. Highways England would welcome the opportunity to work with Warrington Borough Council to understand the implications both individually and cumulatively of the potential sites should they be taken forward as part of the Council's Draft Local Plan. This is relevant as the Call for Sites returned the majority of sites within designated Green Belt peripheral to the existing urban form. Green Belt locations typically offer limited multi-modal accessibility, which in the absence of targeted intervention, may result in a greater mode share for private car use and in turn impact upon the efficient operation of the SRN. Should these sites be taken forward then Highways England would require an understanding of the impacts upon the SRN and detailed proposals to mitigate these impacts.

It is acknowledged that the Call for Sites is currently at an early stage with limited evidence available, thus this response has not gone into significant detail regarding the potential impact upon the SRN; instead our comments are recommended for detailed consideration should the sites gain further status in the ongoing plan preparation.

Table 1. Call for Sites Ward Summary

Ward	Comment
Appleton	Appleton Ward has sites totalling 269 hectares, with the majority comprising housing sites. Significant sites include the Land at Higher Walton which is a preferred housing site and comprises 125 hectares. Given the existing mode share in Warrington and the proximity to the M56 and M6, there is likely to be a potential cumulative and individual traffic impact on the M56 and M6 corridors, and M56 Junction 10, Lymm Interchange, and M6 J20 in particular.
Bewsey & Whitecross	No comment on individual proposal for ward allocation.
Burtonwood & Winwick	The Call for Sites results in 128.1 hectares of potential sites in Burtonwood & Winwick, comprising housing, employment and multi-use. Such development could result in a potential cumulative and individual traffic impact on the M62 corridor and M62 Junctions 9 and 10 in particular.
Culcheth, Glazebury & Croft	The Culcheth, Glazebury & Croft wards are targeted for sites totalling some 449.7 hectares, with the majority comprising housing sites. There are three significant individual sites in this ward; Land NW of Croft (129 hectares), Wider land north of Culcheth (111 hectares), and Land NE of Culcheth (96 hectares). Each individual site is preferred for housing. Given the existing mode share in Warrington and the proximity to the M56 and M6, there may be a potential cumulative and individual traffic impact on the M6 and M62 corridors, and the M62 Junctions 10 and 11 in particular.
Grappenhall	This ward has potentially 347.1 hectares of housing sites and 136.8 hectares of employment sites which could well result in a potential cumulative and individual traffic impact on the M6 corridor and M6 Junction 20/Lymm Interchange (J20a) in particular. Potential impacts could also extend to Junction 10 of the M56. Both the largest preferred housing site (Land to SE of Warrington, 22 hectares) and employment site (Land at Bradley Hall Farm, Cliff Road, 92 hectares) are located in this ward, with the Land at Bradley Hall Farm site located adjacent to the M6 corridor.
Latchford East	No comment on individual proposal for ward allocation.
Latchford West	No comment on individual proposal for ward allocation.
Lymm North & Thelwall	The Call for Sites results in 114.2 hectares of potential sites in the ward, comprising predominantly housing. There may be a potential cumulative and individual traffic impact on the M6 corridor and M6 J20/Lymm Interchange (J20A).
Lymm South	The Call for Sites results in 232.7 hectares of potential sites in the ward, comprising housing and multi-use. There may be a potential cumulative and individual traffic impact on the M6 corridor and M6 J20/Lymm Interchange (J20A).
Penketh &	This ward has potentially 106 hectares of housing sites and 74.2 hectares

Ward	Comment
Cuerdley	of employment sites which may result in a potential cumulative and individual traffic impact on the M62 corridor and M62 Junction 7 in particular. Significant sites include the Port Warrington site (74 hectares) which by its nature may lead to increased demand for strategic trips on the SRN.
Rixton & Woolston	The Call for Sites results in 211.2 hectares of potential sites in the ward, comprising housing and multi-use. There may be a potential cumulative and individual traffic impact on the M6 corridor and M6 Junction 21 in particular.
Stockton Heath	No comment on individual proposal for ward allocation.
Westbrook	No comment on individual proposal for ward allocation.

With regards to the possibility of the Fiddlers Ferry site potentially coming forward for redevelopment, Highways England would welcome the opportunity to comment upon proposals as evidence is prepared and plans progress. We would also welcome the opportunity to comment further should additional sites be identified from other parties that also may impact upon the SRN.

Towards a Preferred Development Option

The WLP PDO sets out the strategic objectives for Warrington; objectives W1 and W4 both seek to develop strategic infrastructure, reduce congestion and promote sustainable transport options, and are welcomed and supported as strategic objectives and guiding principles for the further plan development.

The WLP PDO indicates three broad employment locations adjacent to the main urban area which could contribute to Warrington's employment land requirements. The three sites are identified as Land at M56 Junction 9, Land at Warrington Waterfront and Land adjacent to Omega. Highways England supports employment development in the most accessible and sustainable locations, however we would seek detailed evidence in relation to employment locations to substantiate potential impacts upon the SRN.

Preferred Development Option

Overall Approach – Warrington New City

Warrington Borough Council acknowledge the need for significant investment in infrastructure in Warrington. However, Highways England have concerns regarding the limited transport evidence base and/or proposals for strategic transport infrastructure provided to date. It is suggested that such evidence is a prerequisite to ensure a sound and deliverable plan. In the absence of this evidence base, we have some concern that site allocations and mitigation are being proposed in the absence of a wider understanding of their cumulative impacts on the SRN around Warrington. At this stage in the plan making process, Highways England consider that there should be greater certainty over the required highway infrastructure improvements, including where and when they are required, who is responsible for delivering them, and how they will be funded.

Each of the proposed 'Transport Corridor Improvement Schemes' in Figure 10 of the report will have a level of interaction with the SRN and could impact upon its performance. Highways England would expect to see detailed assessments of these scheme proposals within a robust evidence base which demonstrates potential trip growth and potential redistribution impacts affecting the SRN.

The WLP PDO 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 the Council 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 the schemes and any scheme delivery would require prior agreement with Highways England.

It is noted that to fully achieve the WLP PDO, Green Belt release and investment in major infrastructure is required. The Council is proposing a stepped housing trajectory. It is proposed that there will be a relatively lower level of housing delivery for the first 5 years of the plan period given that land will remain in Green Belt until the plan is adopted and to allow for key enabling infrastructure to be delivered. It is proposed that housing will be delivered at a higher rate over the next ten years of the plan before reducing towards the end of the plan period. It will be crucial that phased delivery of identified mitigation is optimised to allow for growth but without significantly impacting upon the SRN. The absence of any detailed evidence of proposed infrastructure improvements and associated impacts in relation to the operation of the SRN should be rectified as part of the further plan development.

Highways England recommends that the overall approach should be developed from a sound evidence base – the only transport related evidence currently available is presented within the WTS. This is not considered to be sufficient as it provides only a high-level assessment of existing provision and needs.

City centre

Highways England supports the aim to provide additional capacity and congestion relief to allow the City Centre to maximise its development potential.

Wider Urban Area

The wider urban area contains many of the strategic employment sites for the region, as well as significant retail and leisure sites. It is noted that the Council's latest Infrastructure Delivery Plan (IDP) will be updated ahead of the publication of the submission version of the Local Plan. A series of key schemes, including east-west road improvements, are introduced in the WLP PDO.

Warrington Waterfront

Consultation material for the proposed 'Western Link' highway scheme suggests that commencement of construction works (subject to funding award) could be expected in the early 2020s. Highways England have provided comment previously regarding the 'Western Link'.

Warrington Garden City Suburb

The WLP PDO states that there is a significant requirement for infrastructure improvements to support the targeted level of growth in this area, including a network of new distributor roads. To achieve the full development potential of the area, an additional connection across the Ship Canal may also be required. Given the scale of development proposals, it will be necessary for the Council to prepare a more detailed masterplan and ensure the timely delivery of infrastructure to support individual phases of development. Highways England is not aware of any evidence being in place to demonstrate the impact of the proposed Garden City on the local or strategic road networks. The absence of any traffic modelling evidence of the performance and effects of the proposed infrastructure is of concern to Highways England at this time. We would welcome the opportunity to be involved with this assessment work to understand the implications upon the SRN and proposals for highway infrastructure improvements to ensure they provide the necessary mitigation. This should not be taken as acknowledgement that Highways England will finance such schemes and any necessary infrastructure improvements to the SRN would require prior agreement with Highways England.

South Western Warrington Urban Extension

We acknowledge that a more detailed assessment of highway capacity will be required to confirm the development trajectory of the South Western Warrington Urban Extension. The scheme layout itself and the resultant impacts upon the SRN will be influenced by the final route and delivery of the 'Western Link'. Highways England would like to see the modelled evidence of the performance and effects of the Western Link on the SRN.

Outlying Settlements

It is noted that the Council has decided to hold back detailed site assessment work to confirm the individual sites to be allocated until after the WLP PDO stage. The allocation of sites should be based upon a sound and robust transport evidence base. Highways England would welcome the opportunity to work with Warrington Borough Council to understand the cumulative impacts upon the SRN, once the scheme plans have been developed and to ensure an appropriate and robust transport evidence base is available prior to the Draft Local Plan being published for consultation.

Traffic Modelling and Next Steps

Highways England recognise that a key element of identified assessment work will be to test the proposed site allocations through the updated Warrington Multi-Modal Transport Model. This will enable the Council to consider transport impacts arising from new development, particularly for the local highway network. We would welcome the opportunity to work with Warrington Borough Council to ensure the plan is supported by a robust transport evidence base, including an assessment of the impact of the plan upon the SRN and that appropriate mitigation measures are proposed.

In advance of the availability of the Warrington Multi-Modal Transport Model, Atkins has undertaken traffic modelling work using a VISSIM micro-simulation model for the SRN network surrounding Warrington. The work has sought to assess the impacts of phased

delivery of the WLP PDO on the SRN, with early work undertaken to assess the traffic generation and distribution of potential allocation sites. Separate model assessments have been undertaken to consider the first five years of Local Plan development, along with the full quantum of development set out within the WLP PDO. The work has taken account of current highway infrastructure commitments associated with Highways England's Road Investment Strategy (RIS1), along with Warrington Borough Council's own committed upgrades at M62 Junction 8. Beyond these initial commitments, further consideration has been given to potential schemes that may or may not come forward as part of future RIS stages. The modelling work is considered part of an ongoing study. Thus far, only initial high level results have been obtained, while further detailed analysis and refinement is intended to be undertaken, culminating in the release of a detailed technical report.

Nevertheless, the traffic modelling work has demonstrated the significant challenges associated with not only bringing forward the targeted level of growth, but also catering for growth associated with neighbouring authority areas and the general increase in background traffic levels on the SRN. Modelling work has indicated material impacts on the operation of the SRN around Warrington associated with future increases in traffic. Further work will be required in parallel to the ongoing development of Warrington Borough Council's Warrington Multi-Modal Transport Model to substantiate potential SRN impacts and 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. The work serves to highlight the need for the development of a realistic, robust transport evidence base at the earliest opportunity. We would welcome the opportunity to work alongside Warrington Borough Council to deliver the necessary evidence base drawing on the alternative modelling tools available.

Conclusions

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 notes that the Warrington Local Plan is at an early stage and that significant work needs to be undertaken in relation to assessing the transport impacts of the proposed growth. At this stage, we have concerns regarding the breadth and depth of available transport evidence, which could affect the soundness and deliverability of the plan. The allocation of sites should be based upon a sound and robust transport evidence base that accounts for the need, effectiveness and deliverability of proposed highway infrastructure improvements.

We request that a comprehensive and transparent cumulative transport assessment is undertaken of the proposals set out in the WLP PDO, along with growth from neighbouring areas and agreed sites. These are required to assist Highways England in forming a full understanding of the implications of growth in Warrington on the future operation and performance of the SRN.

Highways England recommend that the transport evidence base should include consideration of thresholds for development and associated highway impacts, demonstrating the level of highways impact associated with phases of development. The evidence base and subsequent IDP should then identify an appropriate phased mitigation strategy to address identified impacts, both on the local and strategic highway networks.

Initial modelling work undertaken by Atkins suggests that the level of growth set out in the WLP PDO could have a significant impact on the SRN. This serves to highlight the need for the development of a realistic, robust transport evidence base and mitigation strategy at the earliest opportunity.

We would welcome the opportunity to continue to work with the Council to ensure the plan is supported by a robust transport evidence base prior to the publication of the Draft Local Plan. 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.

Yours faithfully

