

Local Plan,
Planning Policy and Programmes,
Warrington Borough Council,
New Town House,
Buttermarket Street,
Warrington,
WA1 2NH

Benjamin Laverick,

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15th November 2021

Dear Sir / Madam,

Warrington Local Plan – Regulation 19 Consultation Response

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

National Highways 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 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.

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Review of the Local Plan Submission Draft Document

The updated Local Plan proposals are similar to those presented for consultation in 2019, with the primary difference being the introduction of a new site at Fiddlers Ferry and the removal of the sites at Port Warrington and in the South West Urban Extension area. In overall development quantum the revised plan has a slight reduction in residential allocations from 20,732 in 2019 to 19,859 in the revised proposals. The employment allocations remain the same overall quantum of 379 hectares. These figures are inclusive of completions from 2016 to 2021.

The horizon years of the updated Local Plan proposals been refreshed to cover an 18-year period from 2021 to 2038. Which is a revision on the previous horizon year of 2036.

The plan summarises the key challenges for Warrington as follows:

- Limited housing and employment land supply;
- Housing affordability concerns;
- Meeting the needs of an aging population;
- **Car dependency;**
- **Traffic congestion;**
- **Air quality impacts;**
- The sustainable supply of minerals and mineral products to meet development aspirations;
- Management of waterways;
- Importing waste;
- **Aging infrastructure;** and
- Areas of deprivation

Policy DEV1 – Housing Delivery is most relevant to National Highways, as it outlines the quantum, location, and general time period for the delivery of housing within the Borough.

In addition to the proposed housing delivery within the existing main urban area of Warrington, the development of the South East Warrington Urban Extension (SEWUE) and Fiddler's Ferry (FF) sites are particularly of interest to National Highways due to expected impacts on the M56 / M6 interchange and M62 corridor respectively.

Policy DEV 4 – Economic Growth and Development is also key for National Highways as it outlines the general quantum and location for employment development within the Borough.

In addition to further growth in the existing employment areas outlined above, the development of the new employment areas at the South East Warrington Employment Area (SEWEA) and Fiddler's Ferry (FF) sites will be of interest to National Highways due to expected impacts on the M56 / M6 interchange and M62 corridor respectively

Policy INF1 – Sustainable Travel and Transport seeks to deliver the Council's objectives of improving the safety and efficiency of the transport network, tackling congestion, reducing carbon emissions and improving air quality, promoting sustainable transport options, reducing the need to travel by private car and encouraging healthy lifestyles.



National Highways support the section of policy which states that developments must mitigate their impact or improve the performance of Warrington's Transport Network, including the Strategic Road Network. Other aspects that National Highways support include those which focus on improving the provision for non-car modes, as this may assist in reducing single occupation car trips within and across the Borough. Furthermore, National Highways support the policy that Transport Assessments must demonstrate that trips generated by a development can adequately be served by the SRN, or identify appropriate infrastructure mitigation measures before a development is brought into use

National Highways support Policy INF5 – Delivering Infrastructure, which seeks to ensure that demand and implications for infrastructure are identified and provided for in a timely manner. Key aspects of this policy include the following:

- *Development will be required to provide or contribute towards the provision of the infrastructure needed to support it.*
- *The Council will seek planning obligations where development creates a requirement for additional or improved services and infrastructure and/or to address the off-site impact of development so as to satisfy other policy requirements. Planning contributions may be sought to fund a single item of infrastructure or to fund part of an infrastructure item or service, subject to statutory processes and regulations.*
- *Where new infrastructure is needed to support development, the infrastructure must be operational no later than the appropriate phase of development for which it is needed.*

Review of Site Allocations

Policy MD1 – Warrington Waterfront

The proposed allocation seeks to deliver 1,070 dwellings on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered, and that an area-wide Travel Plan is implemented on the site.

Policy MD2 – South East Warrington Urban Extension

The proposed allocation seeks to deliver 2,400 dwellings on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered, and that an area-wide Travel Plan is implemented on the site. It highlights that contribution will be needed on the SRN to accommodate this development. This is highlighted in the Infrastructure Development Plan.



Policy MD3 – Fiddlers Ferry

The proposed allocation seeks to deliver 1,300 dwellings on this site during the Plan period. The allocation is supported by policies including a Development Framework to ensure that transport infrastructure identified by a Transport Assessment is delivered, and that an area-wide Travel Plan is implemented on the site. Improvements to the SRN are highlighted in the Infrastructure Delivery Plan.

Policy MD4 – Land at Peel Hall

The proposed allocation seeks to deliver 1,200 dwellings on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered, and that an area-wide Travel Plan is implemented on the site.

Policy MD5 – Thelwall Heys

The proposed allocation seeks to deliver 300 dwellings on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered.

Policy MD6 – South East Warrington Employment Area

The proposed allocation seeks to deliver 127 hectares of employment land on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered. The allocation identifies that no work can begin on this site until improvements have been made at Junction 20 of the M6. SRN improvements have been highlighted in the Infrastructure Delivery Plan.

Policy OS1 – Croft

The proposed allocation seeks to deliver 75 new dwellings on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered

Policy OS2 – Culcheth

The proposed allocation seeks to deliver 200 homes on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered

Policy OS3 – Hollins Green

The proposed allocation seeks to deliver 90 homes on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered.



Policy OS4 – Lymm (Pool Lane & Warrington Road)

The proposed allocation seeks to deliver 170 homes on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered.

Policy OS5 – Lymm (Rushgreen Road)

The proposed allocation seeks to deliver 136 homes on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered.

Policy OS6 – Land to the North of Winwick

The proposed allocation seeks to deliver 130 homes on this site during the Plan period. The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered.

Transport Evidence and Infrastructure Delivery Plan (IDP)

As part of the revised Proposed Submission Draft Local Plan Warrington Borough Council (WBC) have updated the land allocations. Accordingly, WBC revised their transport evidence base and invited National Highways to review the updated draft transport evidence prior to the formal consultation that National Highways have now been invited to comment on as a statutory consultee.

WSP reviewed the draft transport evidence on behalf of National Highways in early Autumn and noted some areas where additional evidence could be supplied to improve confidence in relation to trip rates, distributions and predicted impacts on the SRN. This is summarised as follows:

- Additional information on the trip rates to demonstrate the derived trip rates per zones and time periods,
- Narrative on the implications of matrix estimation on the integrity of the mobile phone data used for trip rate generation,
- Comparison of a trip rate comparison by time period to add to the narrative of adopted trip rates,
- Review of text around the use of TRICS trip rates,
- Provision of narrative on the distribution of adopted trip rates,
- Provision of additional information on the allocation trip distributions,
- Provision of some narrative, and some calibration comparisons, of the updated base model with the additional links associated with the network edits in the Halton area,
- Provision of delay or journey time results from the model covering the SRN.

The draft review also included analysis of the predicted demand impacts on the SRN, carried out based on the supplied traffic forecasts, this analysis predicted that the end of the Local Plan period that a number of locations on the SRN around Warrington may



require an intervention. This analysis highlighted possible local plan impacts at the following SRN locations:

- M6 Junction 20,
- M56 Junction 10,
- M6 mainline between Junctions 20 and 22,
- M6 Junction 22,
- M62 Junction 7,
- M62 Junction 8,
- M62 Junction 9 and
- M56 Junction 11

National Highways welcome that that Infrastructure Development Plan includes schemes at all these locations with the exceptions of M56 Junction 11 and M62 Junction 9 specifically. However it is important to note that M62 Capacity and Junction Improvements are mentioned in the Infrastructure Delivery Plan as a scheme.

Subsequent to this, the draft transport evidence has now been submitted as part of the formal consultation. WBC have informed National Highways (WSP) that the submitted evidence has not accounted for the comments raised in WSP's review; the technical transport evidence appears to be consistent with the draft. As such, the comments presented above related to the transport evidence remain valid.

Western Link Modelling

During the planning application consultation for the Warrington Western Link (WWL) scheme, it was identified at the time that traffic reassignments caused by the scheme have the potential to impact upon Junction 11 of the M56. As such, WBC's consultants Mott MacDonald undertook an assessment of the operational performance of the junction to establish the operational impact that the scheme could be expected to have on the SRN.

WSP reviewed this assessment on behalf of National Highways, which subject to some clarifications on committed development and forecast traffic flows, indicated that the impact of the WWL scheme at the year of opening would be acceptable, while also recommending further detailed investigation into the likely performance of the junction at the horizon year of 2036.

The technical note submitted as part of the Local Plan evidence base does not include M56 Junction 11 in its study area, as the purpose of the note is to demonstrate the impact of the Local Plan on the WWL scheme itself. Along with a number of comments, it is noted that the assessment concludes that "*the developments could have a significant impact on the Western Link*". As such, it is suggested that further assessments are undertaken at M56 Junction 11 to account for both the Local Plan growth, and the delivery of the WWL scheme over the life of the Plan.

Infrastructure Delivery Plan

WBC have submitted an Infrastructure Delivery Plan (IDP) as part of the evidence based documents to support Warrington’s updated Proposed Submission Version Local Plan.

Paragraphs 1.2 and 1.4 state the following:

“The IDP aims to aid all parties in identifying and prioritising infrastructure provision as part of an integrated approach to planning and infrastructure development. In simple terms its purpose is to ensure that infrastructure delivery keeps pace with growth. The Local Plan aims to set out Warrington’s infrastructure requirements within the Borough up to 2038 and the IDP remains an essential mechanism for helping to identify funding priorities and any potential gaps. The IDP will give a clear steer on who is responsible for implementing policies and proposals, by when and the resources that will be required.”

“The IDP has been informed by a range of programmes which impact on spatial planning. It is a “live” document and will be reviewed and monitored regularly to ensure that 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.”

In particular, it is noted that the IDP is intended as a “live” document. This should ensure that any infrastructure identified later in the plan process can still be included. Within the IDP are seven schemes directly relating to the SRN. These are extracted from the IDP and presented in the table below.

	Location	Indicative Cost	Funding Confirmed	Funding Gap	Funding Source	Short Term (2021-2025)	Medium Term (2026-Improvement 2030)
M6 J20 Improvements	South Warrington	£18,000,000	£0	£18,000,000	Developers / Private Sector	*	*
M56 J10 Improvements	South Warrington	£5,000,000	£0	£5,000,000	Developers / Private Sector		*
M6 J21A-26 Smart Motorway	South Warrington	TBC			Highways England (RIS)	*	
M62 Capacity & Junction Improvements	North West / East Warrington	TBC				*	*
M6 Capacity Improvements		TBC				*	*
Fiddlers Ferry - Off Site Strategic Highways - M62 Junction 7	West Warrington	£2,675,000	£0	£2,675,000	Developer		*
Fiddlers Ferry - Off Site Strategic Highways - M62 Junction 8	West Warrington	£267,500	£0	£267,500	Developer		*

Summary

National Highways have reviewed the Warrington Local Plan Regulation 19 and made a number of comments regarding policies and allocations that may have relevance to the operation on the Strategic Road Network (SRN).

It is considered that the transport evidence provided at this stage is strong, displaying evidence throughout to be able to inform National Highways of the impact of the plan proposals at the SRN, at both an individual site allocation level, and on a cumulative basis. It is recommended that a separate, topic specific Statement of Common Ground (SoCG) for transport is written and agreed.

The basic fundamental question of the form, scale and location of the investment needed on the SRN in Warrington as a direct consequence of the growth outlined in the Local Plan shows good understanding, which is essential to ensure that the:

*Function of the SRN is not compromised; i.e. **the primary function of the SRN is to facilitate the safe and efficient movement of goods and people; and the identification of specific appropriate and proportionate highway mitigation measures necessary to facilitate sustainable growth through a safe and efficient highway network.***

National Highways acknowledge that there is ongoing work to enhance some documentation and evidence. National Highways will continue to engage in a collaborative and proactive manner with Warrington Borough Council and other public bodies to ensure the successful completion of this work.

Yours faithfully



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