



# Ashall Property Limited

Annex 5:

South West Urban Extension, Warrington Transport and Highways Appraisal to  
Local Plan Process prepared by Eddisons, November 2021

Ashall Property Limited

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## **SOUTH-WEST URBAN EXTENSION, WARRINGTON TRANSPORT AND HIGHWAYS APPRAISAL TO LOCAL PLAN PROCESS – NOVEMBER 2021**

### **Introduction**

Eddisons have been instructed by Story Homes and Ashall Property Ltd, to advise on the pertinent highways issues contained with the latest documents submitted by Warrington Borough Council (WBC) as part of the emerging Warrington Local Plan process. This advice is specifically targeted on the South West Urban Extension that was included in the Council's 2019 Proposed Submission Version Local Plan as policy MD3: South West Urban Extension but has now been removed from the Council's updated Submission Version Local Plan (UPSVLP).

WBC is currently consulting on its UPSVLP, which will guide development in the Borough to 2037. The UPSVLP has undergone a number of significant changes since the previous iteration of the Plan (2019) including a reduction in the number of houses required and a reduced plan period which in turn resulted in the removal of the number of sites required to be removed from the Green Belt. The draft allocations removed include: South West Urban Extension (1,600 homes), Phipps Lane, Burtonwood Village (160 homes), Massey Brook Lane, Lymm (60 homes). The Plan also seeks to move away from the Garden Suburb concept in South Warrington (4,200 homes previously), and instead now includes a new proposal for the South East Warrington Urban Extension with a reduced capacity of 2,400 new homes in the Plan period. The Plan seeks to introduce one significant site into the Plan at the Former Fiddlers Ferry Power Station following its closure as a power station in March 2020. The Plan anticipates the delivery of 1,310 dwellings within the Plan Period with a further 450 dwellings beyond the Plan period.

### **Considered Documents**

This note will consider the content of the following documents and highlight any potential highways and transport implications with the current Local Plan documents:

- Transport Model Testing of the WBC Local Plan dated August 2021.
- Warrington Western Link Note by Mott Macdonald dated September 2021.
- Development Options and Site Assessment Technical Report dated September 2021.
- Warrington Local Plan Review - Sustainability Appraisal dated August 2021.
- Review of the Warrington Local Plan – Proposed Submission Version Local Plan – March 2019.
- Proposed Submission Version Local Plan - Responding to Representations Report dated 2019.

## Assessment of the SWUE Site

The Proposed Submission Version Local Plan document from March 2019 included an assessment of potential allocation sites across the Borough, which included the SWUE and a number of other strategic allocations. At this time, the Local Plan did not include the Fiddlers Ferry site and included a number of conclusions based on a comprehensive evidence base.

Part of this evidence base would have been informed by the i-Transport ‘Transport Appraisal’ in support of the SWUE from 2019. This document concluded the following:

*The site will include a mix of uses, enabling local active travel, and is close to a comprehensive range of facilities and services at Stockton Heath and Warrington town centre. The draft allocation will therefore support and promote sustainable development and sustainable travel patterns with residents able to meet day-to-day needs locally. This confirms its suitability as a location for development. The site will meet the transport related objectives and policies of the Council’s PSLP. Specifically it will meet objective W4 of the Local Plan and, considering the five accessibility criteria defined by the Council, it will result in positive effects.*

*The Warrington Western Link will provide significant additional capacity in the central Warrington Road network and will assist in facilitating the full SWUE development proposals. The Council has conducted traffic assessments using its traffic model to demonstrate that the traffic flows generated by the full PSLP development, including 1,800 dwellings on the SWUE, can be accommodated on the surrounding highway network with a complementary package of infrastructure including WWL.*

***The residual cumulative traffic impacts of development on the site will not be severe and therefore, in accordance with the NPPF, development should not be prevented on transport grounds.***

***Overall, it is therefore concluded that this assessment confirms that the South West Urban Extension is suitable for allocation in the Council's Local Plan and will form a sustainable development that can provide much needed housing.'***

The Proposed Submission Version Local Plan document from 2019 fully considered all of the evidence available and made a number of clear recommendations for the Local Plan allocations, which remain valid as they were drawn only 2 years ago.

These include the following statements:

- Para 3.3.11 - The South Western Extension is of sufficient scale to support a range of local services and will be facilitated by the Western Link. Residents will have good access by all means of travel to employment, shopping and recreational facilities in the Town Centre and the wider urban area.
- Para 3.3.28 - The Western Link will provide a new road connection between the A56 Chester Road and the A57 Sankey Way, crossing the Manchester Ship Canal, the West Coast Mainline and the River Mersey, making a significant contribution to addressing congestion within Warrington. It will enable the development of the Waterfront area, including Port Warrington. Through reducing traffic levels on the existing road network, it will facilitate the development of the South West extension and a greater level of development within the Town Centre and across Inner Warrington.
- Para 3.4.10 - The South West Extension will provide a new sustainable community supported by local infrastructure and services and will be facilitated by the Western Link
- Para 10.3.3 - The development will be designed to support walking and cycling for local trips. It will benefit from the new Western Link and improved public transport to enable access to the Town Centre, Stockton Heath, the Waterfront development, the new Garden Suburb and other major employment areas, including Daresbury.
- Para 10.3.7 - Development cannot come forward until the funding and the programme for the delivery of the Western Link have been confirmed. This means the first homes are anticipated to be completed in 2023/24, with the urban extension completed in full by the end of the Plan period in 2037.

- Para 10.3.11 - The South West Urban Extension performed well in terms of the assessment against the objectives of the Local Plan, the requirements of the Government's National Planning Policy Framework and the Local Plan's Sustainability Appraisal. The proposed Western Link will also pass through the eastern edge of the allocation site.
- Para 10.3.12 - The urban extension is of a sufficient scale to provide a range of services to support a new residential community in this part of Warrington, including a local centre, primary school, health facility and a network of open spaces. Its location will also ensure good access to Stockton Heath District Centre, Warrington Town Centre, the major development at Warrington Waterfront and other major existing and proposed employment areas, including Daresbury.

Story Homes and Ashall Property Ltd remain wholly supportive of the WWL and indeed are discussing the issue of land assembly with WBC at its southern end as the land south of Chester Road that is in Ashall Property Ltd's ownership site is required to facilitate the southern terminal junction at Chester Road.

Part of the Council's 2019 evidence base included the Proposed Submission Version Local Plan- Responding to Representations Report dated 2019. Within this document there are a number of 'themes' that refer to the various allocated sites at that time. Pertinent to the assessment of the SWUE are Themes 15 and 23 which are listed below together with the WBC responses to each matter:

*'Theme 15: Exceptional Circumstances for Green Belt Release:*

*The South West Extension will provide a new sustainable community supported by local infrastructure and services and will be facilitated by the Western Link*

*Theme 23: Scale of Development in South Warrington:*

*Given the number or nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan. Having undertaken this work and taken into account the representations, the Council considers the general locations for development in south Warrington, as presented in the PDO, to be sustainable.'*

As such, the Council has clearly considered the evidence base in sufficient detail to allow the inclusion of the SWUE site within the Local Plan just two years ago.

In August 2021, a letter was received from WBC that identified that the Council was proposing a number of significant changes to the previous Proposed Submission Version Local Plan (2019) due in large part to a reduction of the Plan's housing requirement and the allocation of the Fiddlers Ferry site for employment and housing following the closure of the power station in March 2020. As a result of this, the Council advised that not all of the land proposed for allocation in the previous version of the Plan is now required, and following the completion of a further options assessment process, the South West Urban Extension was no longer proposed to be allocated in the Local Plan.

There is absolutely no evidence for this assertion whatsoever. None of the 2021 submission documents include any such modelling results on the basis of the SWUE allocation. There is no transparent consideration of the modelling or design of the junctions at either end of the WWL either to be able to conclude that there would be 'significant, engineering, deliverability and viability issues' as a result of the SWUE.

Notwithstanding the 2019 Local Plan documents, the Development Options and Site Assessment Technical Report dated September 2021, states in paragraph 4.11, in relation to the SWUE site, that:

*'Having reviewed representations to the previous PSVLP consultation, the Council considers that this remains a reasonable option, providing a residential led sustainable urban extensions supported by a local centre and new primary school. The Council recognises that the developers promoting the site consider the site could accommodate more than the 1,600 proposed in the previous PSVLP and for the purposes of options assessment the Council has used a capacity of 1,700.'*

The Development Options and Site Assessment Technical Report dated September 2021 document continues, on Page 91, to state the following 'concerns' over the SWUE allocation:

*'Trips generated from the development are likely to push traffic back into the town centre and inner Warrington, offsetting one of the key intended benefits of the Western Link in reducing congestion in these areas and freeing up substantial brownfield development capacity. To mitigate the impact of these developments it is likely that significant additional capacity will need to be provided at the junction of the Western Link and the A57 and the A56. The scale of improvements required to these junctions is likely to raise significant engineering, deliverability and viability issues.'*

This Statement is clearly contrary to the evidence that was submitted to the Local Plan just two years ago. There is no evidence to justify this change of conclusion within any of the Local Plan documents.

In conclusion, there is nothing whatsoever in the 2021 documents (listed on the first page of this note) to suggest that the evidence base used for the current Local Plan documents should have led to the removal of the SWUE site. As such, their decision to remove the SWUE is contrary to paragraph 35 of the Framework (bullet (b)) which requires 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence'. This has not been justified.

## **Assessment of Fiddlers Ferry Site**

The Transport Model Testing of the WBC Local Plan dated August 2021 has included an assessment of the inclusion of the Fiddlers Ferry site within the modelling exercise. Paragraphs 9.6 to 9.11 of the report are summarised below:

*'9.6 Fiddlers Ferry was not an allocated site in the previous modelling of the PSVLP 2019.*

*9.7 The development is proposing to deliver 1,310 homes through Green Belt release and 89.68Ha of employment land on a Brownfield site during the Plan Period with a further 450 homes beyond the Plan Period (a further 450 homes are projected to be delivered beyond the Plan period and these will be considered in the sensitivity analysis).*

*9.8 To provide access to the development, a number of assumptions were made in the modelling to facilitate the development traffic accessing the existing network and can be found in Chapter 5 above. However, no specific off site mitigation measures were included in the modelled network outside the development site itself.*

*9.9 Given the proximity of the development site to Halton, consideration has been given to the trip rate and trip distribution patterns and adjustments made to the matrix to reflect likely travel patterns.*

*9.10 In the immediate vicinity of the development, delays, flows and V/C ratios all increase as the development traffic is added to the existing local network, particularly along the A562 heading towards both Halton and Warrington. There are also increases on the local network heading to/from M62 J7 and the A557 Watkinson Way.*



*9.11 A number of junctions experience increases in delay, both within Warrington and Halton, which will need to be considered for improvement when further detailed work on the development site is undertaken to help mitigate the impacts of the development.'*

Our view is that the results of that modelling on a network wide basis has not been presented in sufficient detail to establish any view as to how the network is likely operate with the Fiddlers Ferry site in the 2038 future assessment year.

In addition, the presentation of the modelling results do not allow any sort of comparison between the results of junction and network modelling from the previous Local Plan development strategy, ie with the SWUE, for example, and without the Fiddlers Ferry site, and the one being progressed now, ie without the SWUE, for example, and with the Fiddlers Ferry site.

This should be a critical thread of how the Local Plan strategy has evolved in recent years and should provide the evidence that the current strategy is more beneficial in transport terms than the previously proposed one, or at the very least acceptable in terms of, in this case, traffic impact on the local and strategic road network.

Moreover, there is no detailed traffic impact analysis contained within any of the Local Plan documents that would allow an assessment of the impact of the Fiddlers Ferry site and a confirmation that all of the mitigation required to ensure that the impact of the proposals was not 'severe', in the context of the Framework, could be delivered without requiring third party land.

It is clear from the August 2021 report, for example on the 'Analysis of Metric' information on Page 69, that the Fiddlers Ferry site will increase traffic flows along the A562 (see below).



## Analysis of Metric:

### Scenario 0 vs. Scenario 2

- Network change in Scenario 2 – A49 improvements and Parkside A&B, Highways England Concept Scheme at M56 J10; Highways England Concept Scheme at M6 J20 Lymm; and SEWUE & SEWEA enabling infrastructure. As there is additional highway infrastructure and capacity in Scenario 2, the PSVLP 2021 demand can choose to access the core network via alternative routes.
- For both AM and PM flows, there are increases in the immediate vicinity of the key development (both increases and decreases as result of re-routing effects):
- Increases in flow along the A562 (Fiddlers Ferry)
- Small decreases along the A49 corridor, increases along the A50 (SEWUE & SEWEA);
- Decreases through Appleton Thorn village as traffic is using the new SEWUE infrastructure; and
- Parkside Link and the new SEWUE link both show large increases as these are not present in Scenario 0 with traffic choosing to use these new links in Scenario 2. The Parkside link is causing large re-routing as the development demand is not explicitly being modelled in this assessment (all growth outside of the borough is based on NTEM), only the highway impact of a new link. The A49 improvements in the vicinity of M62 J9 are resulting in small decreases in flow on the Winwick link, Winwick roundabout and the A49.

The A562 is the main local highway route between Warrington and Widnes with a number of key junctions along its length, including the Fiddlers Ferry Gyratory in Widnes to the west, the 'Lane End' junction and the A57 roundabout junction towards Warrington town centre, to the east.

There are comments in the August 2021 report that suggest that mitigation can be provided on the local highway network that would be able to be provided to accommodate the traffic that would be generated by a redevelopment of the Fiddlers Ferry site.

This is confirmed in Paragraphs 9.10 and 9.11 (detailed above) with increases in flow along the A562, the A557 (in Widnes) and to and from the M62 Junction 7.

However, the August 2021 document provides no evidence of any agreement on the network modelling that has been carried out within the 2021 Local Plan documents with the neighbouring Halton Council and National Highways (NH), although 'engagement' with NH is mentioned, in paragraph 8.106. In addition, no mitigation has been agreed with either Halton Council or NH on their network to ensure adequate mitigation of the Fiddlers Ferry site.

In this context the Framework (2021) states at para 27 that in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency". Given the cross-boundary implications of Fiddlers Ferry on Halton and Warrington we would expect that this should be clearly set out and the relevant highways authority provides open transparent documentation of the assessment work and predicted impacts.

Given the strategic importance of these routes and the regional status of Junction 7 of the M62, there is absolutely no certainty whatsoever that the infrastructure required to accommodate the Fiddlers Ferry site can be achieved.

For example, the 'Lane End' junction, which is the A562/Liverpool Road junction, is a signalised arrangement that is inevitably going to be impacted by any redevelopment at the Fiddlers Ferry site. This junction is very constrained on all sides by existing development and any physical mitigation to improve the capacity of this junction is highly likely to require the acquisition of third party land and there is no certainty of this land being acquired.

In addition, the gyratory system at the A562/A557 (Fiddlers Ferry Junction) is a junction that serves as the approach route to the Mersey Gateway bridge to the south. As with the Lane End junction, this signalised intersection is constrained on all sides by existing development and third party land. Once again, any physical mitigation to improve the capacity of this junction is highly likely to require the acquisition of third party land.

As such, it is clear that there is no evidence that the traffic likely to be generated by a redeveloped Fiddlers Ferry site can be suitably mitigated on the local and strategic road network. It is Eddisons view that in the context of the Framework [para 35] as the evidence supporting the Fiddlers Ferry site is not positively prepared, it is not justified as there is a lack of evidence provided in relation the mitigation of the impacts. It is not consistent with national policy as it fails to meet the requirements of para 104.

Another issue with the current Local Plan allocations is the lack of alignment between the Transport Model Testing of the WBC Local Plan dated August 2021 document and the Development Options and Site Assessment Technical Report dated September 2021.

The latter document refers to 5 development options which are covered within the report. These are listed below with the various sites included within each one from the table in paragraph 4.5.12 of the document.

	Reg19b Option 1	Reg19b Option 2	Reg19b Option 3	Reg19b Option 4	Reg19b Option 5
Urban Constant	11,750	11,750	11,750	11,750	11,750
Outer Settlements	801	801	801	801	801
South East Warrington Urban Extension	2400	2400	2400	/	/
South Warrington Urban Extension	1700	/	/	1700	1700
Fiddlers Ferry	/	1300	1300	1300	1300
Thelwall Heys	/	/	310	310	/
<b>Total</b>	16,651	16251	16,561	15,861	15,551

Appendix 5 of the document subsequently includes a summary of the various options under a title of 'Options Assessment of Main Development Locations' on Page 84 of the document.

None of these options are referred at all in the Transport Model Testing document dated August 2021. As such, there is no comparison that can be made between the impacts of the various Local Plan options at all. This would include an appropriate cumulative assessment of the Local Plan options from the Development Options and Site Assessment Technical Report, which as far as we understand, is the most recent of the Local Plan evidence documents available.

Similarly, the 5 Options are also not referred to in the Warrington Western Link Note by Mott Macdonald dated September 2021.

Due to the current lack of evidence currently available, it is clear that the Fiddlers Ferry draft allocation is contrary to national policy and at present there is no evidence that the site would not generate a severe residual cumulative impact on the road network, contrary to para 110 (bullet (d)) and 111 of the Framework.

## Sustainability

We have also considered the findings of the Appraisal of Urban Extension Options in Appendix G of the Sustainability Appraisal (SA) dated August 2021. We note that there are a number of issues with the Fiddlers Ferry site which raise questions over its suitability for allocation.

In particular, it is clear from the SA that the Fiddlers Ferry site performs poorly in terms of accessibility in comparison to the other growth areas considered and is assessed as having a 'minor negative' effect. With regard to this matter the SA states:

*'It should be noted that only one bus route serves this area, making a regular service and capacity potential issues, with the scale of development being unlikely to increase the viability of new services being delivered (though employment growth on site could contribute towards viability alongside residential growth). The site is likely to deliver some limited onsite services such as a primary school and local shops and potential flexible health space. However, it is somewhat isolated in terms of accessibility to other shops and services, and secondary school, and as such may promote some car dependency. The scale of growth would be somewhat likely to deliver active travel infrastructural improvements, potentially making active travel more viable, however the site is over 5km from central Warrington and as such, some potential active travel potential journeys may instead be taken by private motor vehicle. Whilst the site could lead to some increases in congestion, especially at peak journey times (with the A562 and A57 most likely to be negatively affected), the size of the site increases the viability of infrastructure improvements intended to mitigate the effects of increases in traffic volumes. Overall, development in this location is predicted to lead to minor negative effects as accessibility would not be ideal in terms of walkability or public transport further afield.'*

This 'minor negative effect' compares very poorly with the alternative sites which are also assessed within the 'accessibility' section of Appendix G, as follows:

- South-East Warrington Urban Extension – a combination of moderate positive effect and minor negative effect.
- Thelwall Heys – neutral effect.
- South West Urban Extension - minor positive effect.

The accessibility of the Fiddlers Ferry site is therefore a significant issue and there does not appear to be any clear solution or strategy contained in the plan or policy to address this matter. The site is poorly served by public transport and the assessment suggests that the provision of new services is likely to be unviable so it is difficult to see why any local bus service operators would choose to service the site.

Given the sites isolated location and limited facilities proposed it will be heavily dependent on existing facilities elsewhere which will inevitably increase the reliance of the use of the private car which is clearly contrary to current local and national planning policy. It is also doubtful whether active travel infrastructure improvements would discourage use of the private car given the distance of the site from Central Warrington and other services such as a secondary school.

Given the amount of development proposed on the site and the distance from central Warrington this is a fundamental concern as this lack of accessibility will result in increased trips by private car and may lead to increases in congestion which we have already highlighted is unlikely to be able to be suitably mitigated on land within the control of the Fiddlers Ferry site in any event.

We therefore consider that the site is likely to have a 'major negative' effect in terms of accessibility.

For the reasons set out above, we consider that the SA vastly underestimates the impact of the Fiddlers Ferry site and the scheme is likely to have a major negative effect upon sustainability.

In conclusion, the Fiddlers Ferry allocation does not meet the NPPF tests of soundness set out below from paragraph 35 of the Framework:

- *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence* – this has clearly not been carried out given the previous iteration of the Local Plan which provided a suitable range of housing allocations and the evidence to justify each of them, including the SWUE.
- *Effective – deliverable over the plan period* – there is no evidence the Fiddlers Ferry site is deliverable over the plan period given, for example, the requirement for off site highway works that are unlikely to be provided on land within control of the site or the adopted highway.

- *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies within this Framework* – this note has demonstrated that the redevelopment of the Fiddlers Ferry site is likely to be contrary to the Framework in, for example, paragraphs 104, 110 and 111, and there is no evidence whatsoever to demonstrate that the residual cumulative impacts on the road network would not be ‘severe’.

## Conclusions

In summary, it is clear from this note that on transport and accessibility grounds Fiddlers Ferry is not justified, effective, or consistent with National Policy and should not be presented as a sustainable alternative to the SWUE.

The Council are not justified in their statement on Page 91 of the Development Options and Site Assessment Technical Report dated September 2021 that appears to be a significant factor in the Council’s decision to remove the SWUE from the Local Plan and promote the Fiddlers Ferry as an alternative.

For example, consideration of the 2019 and 2021 Local Plan documents clearly shows that:

- The Fiddlers Ferry site is likely to require major off site highway mitigation works which are unlikely to be deliverable on land owned by the site or on adopted highway.
- The Fiddlers Ferry site is poorly served by public transport and is not considered sustainable in transport terms.
- The Fiddlers Ferry site compares poorly in terms of accessibility to all of the other large residential allocation sites considered in the latest Local Plan evidence base.
- The SWUE has already been demonstrated by the Council as one that can ‘encourage sustainable travel with the improvements being promoted in this part of the town and on the Chester Road corridor and ensure that residents can walk or cycle easily into the core of the town centre and the nearby major employment areas to reduce the reliance on the private car’.
- The previous Council evidence demonstrated that the SWUE could be delivered in conjunction with the WWL and ensure that there were likely to be no ‘severe’ impacts resulting from its redevelopment.

- Story Homes and Ashall Property Ltd remain wholly supportive of the WWL and indeed are discussing the issue of land assembly with WBC at its southern end as the land south of Chester Road that is in Ashall Property Ltd's ownership site is required to facilitate the southern terminal junction at Chester Road.

The latest evidence documents submitted in support of the emerging plan do not provide any transport based justification for the removal of the SWUE site in favour of the potential redevelopment of the Fiddlers Ferry site.

There is no evidence that the current Local Plan strategy, which includes the Fiddlers Ferry site, is acceptable in transport terms and the Council have been inconsistent in their approach and evidence base. The Local Plan, as proposed, is therefore unsound when considering the Framework.