

Paper 1: Main representation

Representations to the Warrington Proposed
Submission Version Local Plan (2021)

Peel L&P Holdings (UK) Limited

November 2021

Turley

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Client

Peel Holdings (Management) Ltd

Our reference

PEEM3056

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1. Introduction

- 1.1 This Paper forms part of a suite of documents which together comprise the representations of Peel L&P Holdings (UK) Limited (“Peel L&P”) (“Peel”) to the Warrington Proposed Submission Version Local Plan 2021 (“PSLP 2021”) and accompanying background documents published by Warrington Borough Council (“the Council”).

Peel L&P

- 1.2 Peel L&P is an ambitious regeneration business with generations of history, heritage and expertise in its DNA. First established in 1972, Peel L&P is now responsible for some of the most transformational development projects in the UK today. Owning and managing 12 million sq ft of property and 20,000 acres of land and water, Peel L&P’s holdings are concentrated in the north west of England but it also owns and manages significant assets throughout the UK with a total portfolio value of £2.4 billion.
- 1.3 Peel acts as both a developer and facilitating landowner in the housing, employment, energy and port sectors, working alongside a wide range of public and private sector partners. It is delivering some of the country’s largest development projects.

Peel’s interests

- 1.4 Comments in this representation are provided in the context of Peel’s significant and diverse land and development interests in Warrington, including:
- Land within the ‘South West Urban Extension’ (SWUE) which was proposed for release from the Green Belt and allocation for residential development for approximately 1,600 dwellings in the 2019 Pre-submission Local Plan (PSLP 2019) (Policy MD3)
 - Major greenfield and Green Belt sites with significant residential development potential across the wider Borough, including within the Outlying Settlements of Lymm, Croft, Culcheth and Hollins Green
 - Various smaller sites within the urban area and outside of the urban area with mixed use development potential, owned by Peel Land and Property;
- 1.5 Peel L&P alongside Peel Ports Group, is also owner and promoter of the proposed expansion of Port Warrington and, associated with this, a new Warrington commercial Park and a regionally important Country Park, previously proposed for allocation as part of the Warrington Waterfront designation in the PSLP 2019 (Policy MD1). Separate representations are made in relation to this asset jointly on behalf of Peel L&P Holdings (UK) Limited and Peel Ports. This representation, principally dealing with housing matters (including the South West Urban Extension and Outlying Settlements) are made on behalf of Peel L&P only.
- 1.6 Peel L&P alongside Peel Ports has engaged extensively in the Warrington Local Plan preparation over a number of years. Most recently, representations were made to the

Regulation 18 consultation in 2016, the Preferred Development Option consultation in 2017 and the Proposed Submission Local Plan consultation in 2019.

Structure of Peel L&P's representations

- 1.7 Peel's representations to the PSLP 2021 are contained within a number of documents as follows:

Strategic Papers

- **Paper 1: Main representation** (this Paper) – provides an overview of Peel's representations and captures the key points relating to the overall soundness of the PSLP 2021, including drawing on evidence presented in other papers
- **Paper 2: Technical review of the proposed housing requirement** – provides a critique of the PSLP 2021 housing requirement
- **Paper 3: the housing supply** – provides a critique of the identified housing land supply upon which the PSLP is reliant to meet the proposed housing requirement
- **Paper 4: The Outlying Settlements** – presents an assessment of the Council's approach to the appraisal of options for accommodating the development needs of the Outlying Settlements and the selection of sites for allocation

- 1.8 The above papers collectively set out a case for the allocation of the SWUE for residential development via a reinstatement of the allocation proposed through the 2019 PSLP or its designation as safeguarded land. This allocation is necessary to address the soundness issues raised through this representation.

- 1.9 This site can accommodate approximately 1,780 residential units a new primary school, local centre and significant green infrastructure, providing a high quality, family housing-led development capable of making a sustainable contribution to meeting the Borough's development needs whilst contributing to the financing of the strategically important Western Link road which is critical to the delivery of the Local Plan.

- 1.10 These representations also set out a case for the allocation of a number of alternative sites for residential-led development in four Outlying Settlements. These are:

- Land north of Culcheth – 300 dwellings during the plan period and 300 dwellings beyond the plan period (through a safeguarded land designation) alongside the provision of highway improvements to Warrington Road, potential expansion area for Culcheth Secondary School, the development of a country park and other open space
- Land at Rushgreen Road, Lymm – **Residential led mixed use development for 115 dwellings** during the plan period including potential community, health, education, sports, recreation and tourism uses through a safeguarded land designation)

- Land at Manchester Road, Hollins Green – **93** dwellings during the plan period and 112 dwellings beyond the plan period (through a safeguarded land designation)
- Land at Lady Lane, Croft – 83 dwellings during the plan period and 112 dwellings beyond the plan period (through a safeguarded land designation).

1.11 Finally, this representation sets out a case for the allocation of land at Statham Meadows to meet the identified need for additional employment-led development over the plan period.

Development Prospectuses and technical evidence base

1.12 To supplement Papers 1 to 4, full Development Prospectuses and an associated technical evidence base in respect of the aforementioned residential sites are submitted as part of Peel’s representations. These demonstrate that these proposals represent sustainable and deliverable development opportunities. In respect of SWUE, the Development Prospectus is also submitted by Story Homes and Ashall Land who have an interest in the SWUE site and who are working collaboratively with Peel to promote this sustainable residential development opportunity.

1.13 An additional Development Prospectus and associated technical evidence base is provided in respect of a further site owned and controlled by Peel at North West Croft. Whilst Peel’s representations do not directly support the allocation of a site of the scale of North West Croft in this location at this time, the Development Prospectus and associated evidence base demonstrate that this site is deliverable for residential development being in the control of an experienced developer and not affected by any insurmountable constraints. In the event of an unmet housing requirement in the Outlying Settlements, the site would represent a sustainable development option. This site is formally submitted to the Local Plan as such and should therefore be considered as a development option by the Council.

2. Summary of representation

- 2.1 Peel recognises and fully supports the strategic objectives of the PSLP 2021 including the regeneration of Inner Warrington and the delivery of strategic and local infrastructure as expressed through Strategic Objectives W1, W3 and W4. It supports the PSLP's conclusion that the Western Link represents *'the largest transport infrastructure scheme and is fundamental to the delivery of the spatial strategy of the Local Plan.'*¹
- 2.2 The above objectives sit at the heart of the plan's vision. A strategy of focusing growth on the main settlement of Warrington and extensions to it flows from these objectives. This is supported by Peel. It is recognised that the realisation of these objectives requires a critical mass of development to be directed to Warrington as proposed.
- 2.3 Peel also supports the Council's position that exceptional circumstances exist to justify the release of land from the Green Belt. Meeting the Borough's housing and employment needs are key objectives of the PSLP in accordance with the requirements of NPPF. This need cannot be met in full through land outside of the Green Belt. The Council has sought to maximise the use of land outside of the Green Belt, as first priority, and thus exceptional circumstances are presented to warrant a Green Belt boundary review in order that the Borough's full plan period housing and employment needs can be met.
- 2.4 However, it is Peel's position that, as a whole strategy, the PSLP is fundamentally unsound in the form presented with its critical shortcomings being that it:
- (a) does not seek to meet the proper housing needs of the Borough over the plan period
 - (b) does not seek to meet the proper employment development needs of the Borough over the plan period and is reliant on a supply of sites which present a high level of risk of under-delivery
 - (c) significantly over-estimates the residential development yield from the urban area over the plan period. Most notably:
 - It is overly reliant on a fledging town centre residential market, the investor appetite for which is, at best, uncertain with a very significant level of risk that this market will not deliver at the level claimed by the Council.
 - It has materially over-estimated the developable capacity of a number of specific sites within the identified supply
 - It has not justified the assumed uplift in past delivery rates from the urban area

¹ PSLP 2021 paragraph 3.3.30

- It does not take account of the Council's own evidence regarding the viability of residential development in different parts of the urban area which demonstrates that a number of areas within the Borough, most notably the Town Centre, are not viable for residential development even with nil affordable housing contributions

(d) does not meet the qualitative housing needs of the Borough reflected in the planned over-provision of apartments (in the town centre), an under provision of family homes relative to the identified need and adoption of a strategy which will fail to meet the affordable housing needs of the Borough

(e) does not make sufficient provision to ensure the Green Belt can endure over the long term and avoid the need for a further Green Belt review beyond the plan period through the designation of safeguarded land for housing and employment development

(f) is underpinned by a deficient and inconsistent appraisal of development options used to select sites for release on the edge of the Warrington urban area to meet its development needs including:

- over-estimating the Green Belt impacts arising from the development of the SWUE, which forms part of three of the five development options considered by the Council and, in comparable terms, under-estimating the impact of the South East Warrington Urban Extension (SEWUE) in this regard;
- incorrectly concluding that the SWUE will give rise to unacceptable impacts on the proposed Warrington Western Link Road and therefore will have a severe impact on the highway network
- incorrectly concluding that the SWUE is constrained by education capacity constraints
- appraising development options and sites to deliver the PSLP with limited technical evidence to test and demonstrate their deliverability and the extent to which they represent sustainable sites with respect of a number of critical technical matters including landscape impact, flood risk, ecology, noise, utilities capacity and agricultural land classification
- failing to recognise the beneficial effects of the SWUE being able to deliver residential units early in the plan period and therefore its ability to reduce the reliance on a stepped residential development trajectory
- failing to recognise the beneficial effects of the SWUE in being able to justifiably (in CIL Regulation terms) and viably provide a contribution towards the delivery of the Western Link in appraising options which include the SWUE

- An unjustified change in approach to the assessment of the SWUE through the Sustainability Appraisal process with particular regard to its ability to contribute to the delivery of strategic infrastructure (the Western Link)

(g) fails to set out a clear and credible delivery strategy for the Western Link – a critical piece of infrastructure to deliver the Local Plan – and to address the significant challenges to funding this in the context of reduced development requirements, the removal of previously proposed allocations which would otherwise contribute financially to the Western Link and evidence that development in identified growth areas within the urban area is, at best, marginal and so with limited prospects of being able to contribute, financially, to the Link Road

(h) has not selected the most sustainable options for delivering the development needs of the Outlying Settlements based on a deficient site selection process and erroneous judgements made in the process of selecting sites for allocation

2.5 Collectively, these shortcomings result in the PSLP being unsound as presented:

- It is **in conflict with the National Planning Policy Framework (NPPF)** (paragraphs 11a, 23 and 60) on the basis of (a and b)
- Is not deliverable and is therefore **not effective** on the basis of (c), (d) and (g)
- It is **in conflict with NPPF** (paragraph 140) on the basis of point (e)
- The evidence base is incomplete and deficient and does not support the conclusion that the development option selected for the main Warrington urban area and in the Outlying Settlements of Lymm, Culcheth, Croft and Hollins Green are sustainable when compared to reasonable alternatives. The PSLP is **not justified** therefore on the basis of points (f) and (h).

2.6 Collectively, the following policies of the PSLP 2021 are unsound:

- Policy DEV1: Housing delivery
- Policy DEV2: Meeting Warrington’s housing needs
- Policy DEV4: Economic growth and development
- Policy TC1: Town Centre and Surrounding Area
- Policy GB1: Warrington’s Green Belt
- Policy INF5: Delivering infrastructure
- Policy MD1: Warrington Waterfront
- Policy MD2: South East Warrington Urban Extension

- Policy MD 5: Thelwall Heys
- Policy OS1: Croft
- Policy OS2: Culcheth
- Policy OS3: Hollins Green
- Policy OS4 Lymm – Pool Lane/Warrington Road
- Policy OS5: Lymm – Rushgreen Road

2.7 The evidence base to the Local Plan is deficient and does not provide a sound justification for the content of the policies outlined above.

2.8 Soundness can be partly corrected through:

- 1) ***Making provision for the delivery of at least 1,050 residential dwellings per annum during the plan period***
- 2) ***Identifying additional sites to be released from the Green Belt arising from the evidenced increase in the objectively assessed need for housing in plan period.*** Even accepting the urban supply figure put forward by the Council and the proposed flexibility allowance of 10%, this alone would mean a requirement for additional sites capable of delivering some 4,312 dwellings to be released from the Green Belt;
- 3) ***Identifying further additional sites to be released from the Green Belt to reflect the deficiencies in the urban land supply identified through this representation.*** At this stage, and without consideration of the significant market constraints affecting the planned supply, the Council's evidence base shows that the plan period urban supply amounts is at least 3,446 dwellings less than claimed by the Council. Further land to deliver at least this level of residential development should be identified for release from the Green Belt.
- 3) ***Releasing additional land in the Green Belt to be designated as safeguarded land to meet potential development needs beyond the plan period.*** Cumulatively, land capable of delivering up to 4,249 dwellings should be released for this purpose, with a proportion of this directed to the Outlying Settlements with additional land allocated as safeguarded to meet employment development needs beyond the plan period
- 4) ***Allocating additional land for employment development, including land at Statham Meadows for employment or mixed commercial development to reflect the proper OAN for such development***

2.9 Even in the event that the PSLP were advanced based on the Council's proposed housing need and supply position, this representation demonstrates that the Council's assessment of the development options for delivering development in Warrington (i.e. the selection of Green Belt sites for release) is flawed and has erroneously identified that those options which include the allocation of the SWUE will give rise to impacts

that others don't. On the contrary, this representation identifies that the SWUE, as a development option, provides unique benefits which others cannot deliver and indeed that the impacts that the Council asserts will arise from its development will very evidently not.

- 2.10 Whilst the scale of need for the release of Green Belt land on the edge of Warrington would justify the allocation of SWUE alongside the sites selected, if considered on a comparative basis, the SWUE represents the most sustainable of all the Green Belt release options considered and should be prioritised in this regard.
- 2.11 In respect of the Outlying Settlements, soundness would be corrected through the allocation of Peel's sites at Hollins Green, Culcheth and Lady Lane, Croft reflecting their sustainability relative to alternatives assessed and selected by the Council.

3. Meeting housing needs

3.1 This section of Paper 1 is informed by the analysis in Papers 2 and 3. It sets out an overall position on the amount of land which the Local Plan may need to identify for release from the Green Belt in order to ensure the Plan meets the objectively assessed need. This figure is generated through a combination of:

a) Identifying what the proper objectively assessed housing requirement over the plan period is

b) Determining the extent to which the sources of urban land identified by the Council will meet this requirement with the required level of certainty and assurance

3.2 Paper 2 identifies that the PSLP 2021 should plan for a higher level of housing development to meet the objectively assessed need and therefore to satisfy paragraphs 11a, 23 and 60 of NPPF and the 'positively prepared' test of soundness. Paper 3 identifies that the land supply upon which the PSLP 2021 is reliant will not deliver development at the level claimed by the Council and further that there is a high level of risk and uncertainty inherent within the supply, reflective of its make-up and the types of housing which the Council is seeking to deliver and by reference back to past rates of delivery as a benchmark. In combination, this means the PLSP 2021 will not be effective in delivering the Borough's housing requirements. It is unsound as a result.

The housing requirement

The Objectively Assessed Housing Requirement

3.3 By reference to Paper 2 of Peel's representations, the Local Plan should proceed on the basis of a requirement to provide 1,050 dwelling per annum over the plan period, some 29% more than proposed by the Council. This principally reflects that the PSLP is presently planning for a level of housing growth which does not reflect its economic ambition and the amount of employment land it is seeking to bring forward. As a result, and without accommodating a commensurate level of housing growth, the Borough's labour force will not grow to the level needed to realise its economic growth ambitions and to deliver the level of employment development which the PSLP seeks.

Meeting qualitative housing needs

3.4 Further, and also by reference to Paper 2, there is a clear mismatch between the type of housing being planned for and the qualitative needs of the Borough and its residents, characterised by an over-reliance on the provision of apartment products in the Town Centre and a resultant under provision of family housing relative to needs. Notwithstanding the comments in Paper 2 and below regarding realistic yield from the Town Centre market, this alone means that the Council should reduce its reliance on the Town Centre to meet the PSLP needs and increase the allocation of sites for family housing.

3.5 That is not to say the Council's ambitions for the regeneration of the Town Centre and growing its residential population should be diluted but rather that the extent to which

any yield from this location goes to meeting the calculated housing requirement for the purposes of the Local Plan, its contribution should be moderated to reflect its limitations in meeting the qualitative needs identified.

- 3.6 Any housing requirement proposed is self-evidently a minimum and can be exceeded if there is an opportunity to grow the Town Centre residential market in the interests of delivering the Council's regeneration aspirations for this location.

Will the housing land meet the requirement?

- 3.7 The Council indicates that its urban land supply between 2021 and 2038 is 11,785 dwellings. This is not evidenced. The Council has not published a schedule of sites which make up this supply and so it is not possible to assess the credibility of the Council's claim. The evidence base to the PSLP is deficient in this regard on this account alone the Plan is clearly unsound. Peel requests that full information on the components of the housing land supply is published as soon as possible. It reserves the right of make further submissions in relation to the Council's housing land supply on receipt of this information.

The urban supply

- 3.8 At present, and through the analysis in Paper 3 and by reference to the Council's latest evidence on supply (that being the 2020 SHLAA), Peel considers the evidenced developable supply housing land supply to be some 4,561 units less than evidenced by the Council. This is against a claimed 15 year supply figure of 10,430 in the 2020 SHLAA. The SHLAA identifies that four sites will continue to deliver beyond the 15 year period, providing an additional 717 units (total supply of 11,147).
- 3.9 The 2020 SHLAA has a base date of 1 year before the plan starts. It is evident from the supply critique presented in Paper 3 that a number of the sites identified in the 2020 SHLAA have been completed by 2021 and therefore will not contribute to the plan period supply. This accounts for 1,115 units in the 2020-base supply. It is assumed the Council does not intend to include these units in its 2021 – 2038 supply but this is unclear.
- 3.10 Further a number of other sites, whilst not yet developed, do not satisfy the developable test in NPPF to the extent assumed and so should be discounted from the supply or their yield reduced. This accounts for 3,446 units identified in the 2020-base supply. This is captured in the analysis in Paper 3.
- 3.11 In combination, a total of 4,561 units (1,115 + 3,446) identified in the 2020 SHLAA are either not available to contribute to the 2021 to 2038 supply having either already been developed or proven, through Peel's analysis, to not be developable.
- 3.12 It is assumed that the Council's claimed supply of 11,785 dwellings during the plan period does not include the 1,115 units from the 2020 SHLAA which have been developed by 2021. It is however assumed that other 2020 SHLAA sites form part of the proposed 2021 to 2038 supply. For the reasons outlined above, neither of these assumptions can be verified due to the lack of published evidence on the make-up of the housing land supply.

3.13 To the extent that the Council's claimed plan period yield of 11,785 includes sites from the 2020 SHLAA which are yet to be developed, the developable supply from this source is at least 3,446 units lower than set out by the Council in the SHLAA. The Council must address this deficiency through the publication of a full schedule of sites to meet the requirement during the plan period.

The town centre supply

3.14 Notwithstanding the above, given the fundamental risks and uncertainties in the town centre market and the remote prospects of this being developed at the rate assumed by the Council, it must proceed with a significant level of caution when determining the realistic yield from this location and adopt a realistic total figure reflected of its market capacity. This is a separate but related matter to the issue of whether individual town centre sites are developable when considered on an independent basis.

3.15 This is not to say that the Council should dilute its ambitions for the town centre or limited residential development in this area but should adopt a more realistic estimate of the pace at which the town centre / 'urban living' market – as a distinct sub-sector of the housing market and one that doesn't presently exist in Warrington – will emerge **over the plan period.**

3.16 This could be dealt with through an increased flexibility allowance to reflect the inherent risk and uncertainty arising from reliance on this market. This is considered below.

The Council's viability evidence

3.17 Peel has commissioned CBRE to provide a critique of the Council's viability evidence² and to provide analysis on the implications of this for PSLP and the extent to which its housing land supply will meet the development needs of the Borough, including both market and affordable housing. Their appraisal is provided at Appendix 4.

3.18 This draws attention to a number of weaknesses in this evidence base and demonstrates that it has adopted overly optimistic assumptions regarding viability across a number of metrics. In addition to this, CBRE's paper draws attention to a number of findings within the viability evidence which would bring further into question the deliverability of the PSLP based on the portfolio of sites upon which it is reliant. It notes that the Council's viability evidence reports that:

- Large parts of the Warrington urban area which are relied upon to meet the PSLP's housing needs cannot viably support development on a policy compliant basis
- The viability of residential development in the town centre is particularly compromised with this being unviable even with nil affordable housing. Large town centre developments (250 units +) are shown still to be unviable with nil affordable housing and even allowing for a 10% increase in sales and a reduction in both contingency and professional fees

² Emerging Local Plan Viability Assessment (Cushman & Wakefield August 2021)

- Site allocations at Peel Hall (1,200 units) and Warrington Waterfront (1,070 units) are shown not to be viable.
- 3.19 This serves to reinforce the fragility in the supply and the reality that there is a very high likelihood that this will not deliver at the levels claimed by the Council. The position is particularly acute in the town centre – a location which is relied upon to deliver some 4,500 units over the plan period with prevailing evidence pointing towards development in this location being very significantly compromised in viability terms.
- 3.20 Bringing these points together it is evidently the case that the Council has over-estimated the yield from the sources of supply identified. It has not presented a full schedule of sites which it considers to comprise the developable supply to the end of the plan period and so is in conflict with paragraph 68 of the NPPF. It is unsound on this point alone.
- 3.21 Further it has no plan in place to address the challenges to delivery in respect of those sites which may be available to contribute during the plan period but where significant viability and market constraints are likely to be a drag on delivery – e.g. through a public sector funding strategy or development partnership. The viability gap across the supply is significant and cannot simply be passed off as something which will be resolved in the fullness of time. This issue goes to the very heart of the plan’s soundness, which is evidently undermined by a strategy of relying so heavily on an unviable supply.
- 3.22 To the extent that sites can be viably delivered through appropriate adjustments (e.g. reduced Section 106 obligations), this will not deal with the fundamental issue of the supply’s inability to meet needs. There is both a quantitative and qualitative dimension to meeting needs and, in this regard, a key objective of the PSLP is to ensure the full breadth of housing needed in the Borough is provided, including for affordable housing (NPPF paragraph 62).
- 3.23 The Council’s Local Housing Needs Assessment identifies an annual requirement for 423 affordable homes, an increase of some 15% on the need identified in 2019³. Whilst the PSLP is unlikely to deliver this level of affordable housing development, it should seek to take positive steps to maximise the extent to which it can do so in the context of a need to pursue a strategy which is sustainable in overall terms.
- 3.24 The PSLP 2021 has taken a significant backwards step in seeking to meet needs in proposing a reduction in the extent of proposed Green Belt releases (sites which can typically provide good levels of affordable housing) and reliance on sites which are proven not to be capable of viably providing any affordable housing. This retrograde step between 2019 and 2021 has been taken in the context of housing affordable need increasing by 15% over that period. It is readily apparent that the supply of sites will not meet the Borough’s housing needs when considered on either a quantitative or qualitative basis.

³ Warrington Local Housing Need Assessment Update 2021 Table 29

The flexibility allowance

- 3.25 The PSLP 2021 includes a 10% flexibility allowance to reflect uncertainty and risk in the supply and protect against sources of land not delivering at the rate assumed.
- 3.26 If more realistic assumptions around the developable supply within the urban area are adopted based on the analysis in this representation, a 10% flexibility allowance is deemed to be appropriate. This reflects that the adoption of a lower yield figure for the urban area will, consequentially, deal with some of the underlying market constraint issues (i.e. through a figure which better reflects the market capacity of the town centre) and so reducing the risk of under delivery for market related reasons.
- 3.27 However, an alternative means of addressing the issues of evidenced uncertainty and risk inherent within the supply would be to maintain the urban supply figure of 11,785 units (subject to evidence being presented about the makeup of this supply) but increase the flexibility allowance to say 25%. This reflects the evidence presented in these representations which point towards the town centre particularly, but also the wider urban area, not being capable of delivering at the rates assumed by the Council due to market constraints and indeed there being significant question marks as to whether a number of sites are genuinely developable based on the assessment presented in Paper 3.

The unmet requirement

- 3.28 Taking the above considerations into account, it is possible to begin to identify the unmet housing requirements – that is to say the amount of additional land which would need to be met through the release of additional Green Belt sites in order to meet the Borough's housing requirements. This is considered in Table 3.1 below.
- 3.29 This is presented indicatively only since Peel has been unable to undertake a proper analysis of the urban supply relied upon during the plan period for the reasons pointed out. As such, in the analysis below the Council's claimed, but as yet un-evidenced, urban supply of 11,785 units (2021 to 2038) has been discounted to account for those sites in the 2020 SHLAA which Peel expects to form part of the Council's claimed 2021 – 2038 supply but which it does not consider to be developable to the extent proposed for the reasons explained.
- 3.30 The effect of this is a 3,446 unit reduction on the Council's claimed urban land supply of 11,785. See Paper 3.
- 3.31 This is presented in Figure 3.1 below.

Table 3.1: Residual housing land requirement (based on supply reduction)

	a) Plan period housing requirement	b) Flexibility allowance	c) Urban supply	d) PSLP proposed Green Belt release	e) Residual Green Belt requirement (a+b-c-d)
PSLP 2021	14,688	10%	11,785	4,865	-494
Peel's representations	19,000	10%	8,339	4,865	7,696

3.32 In the alternative scenario of dealing with the risk in the urban supply through a higher flexibility allowance, the residual requirement is presented in Table 3.2 below.

Table 3.2: Residential housing land requirement (flexibility increase)

	a) Plan period housing requirement	b) Flexibility allowance	c) Urban supply	d) PSLP Green Belt release	Residual Green Belt requirement (a+b-c-d)
PSLP 2021	14,688	10%	11,785	4,865	-494
Peel's representations	19,000	25%	11,785	4,865	7,127

3.33 As a sensitivity test, any single step (need or supply based) proven by Peel as being necessary to ensure the PSLP meets its housing requirement would give rise to a need to release additional Green Belt land above the level proposed. This is illustrated through Table 3.3 which tests the impact of an increase in the flexibility allowance alone (i.e. with all other variables remaining as per the PSLP).

Table 3.3: Residual housing land requirement (flexibility increase only)

a) Plan period housing requirement	b) Flexibility allowance	c) Urban supply	d) PSLP Green Belt release	Residual Green Belt requirement (a+b-c-d)
14,688	10%	11,785	4,865	-494
14,688	20%	11,785	4,865	974
14,688	25%	11,785	4,865	1,710

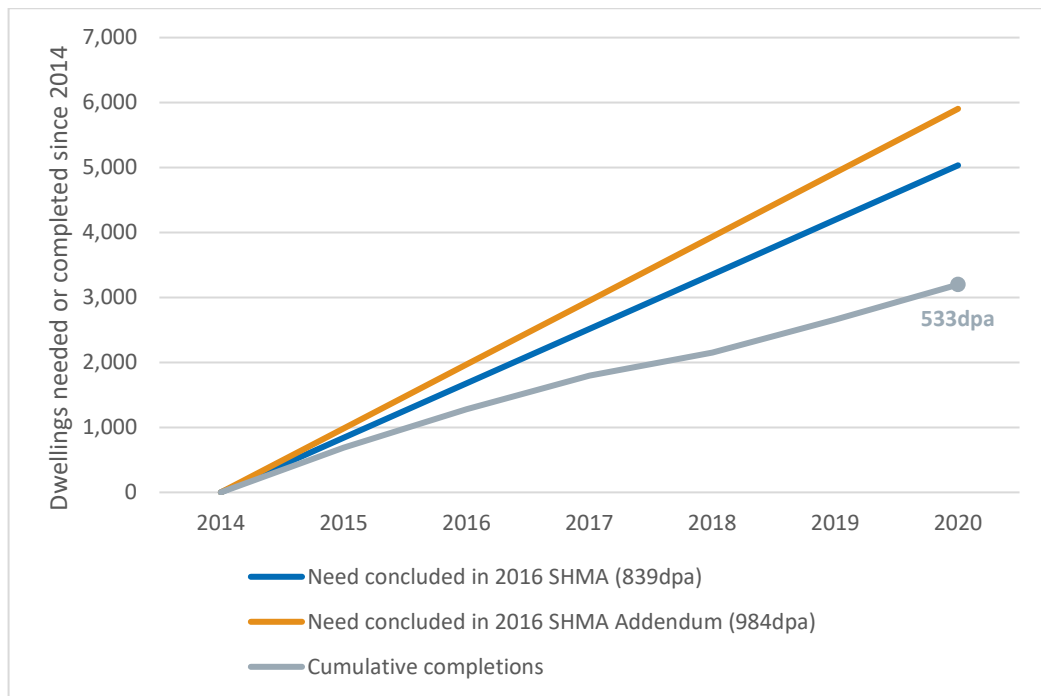
- 3.34 It is therefore evident that the Council has significantly under estimated the level of Green Belt release it needs to plan for in order that the PSLP's housing requirements are met. Even on a very conservative estimate based on maintaining the annual requirement at 816 dwellings per year, maintaining the urban supply at 11,785 dwellings and only adjusting the flexibility allowance upwards (10 to 20%), this would still result in a need for an additional 974 dwellings during the plan period.
- 3.35 Additional Green Belt sites will need to be identified and allocated for residential development in order that the PSLP can proceed on a sound basis and in a manner which ensures its housing requirements are properly planned for and met in accordance with NPPF.

An unjustified stepped trajectory

- 3.36 Paper 2 in its presentation of a technical critique of the housing requirement affirms that there is a pressing need for new homes now and that where Warrington achieves its economic growth aspirations this need will increase.
- 3.37 In this context, the proposed stepped housing requirement in the PSLP 2021, which assumes planning for a level which is below even the minimum need for homes over the first five years of the plan period is unjustified.
- 3.38 At a basic level, the onus must be on the draft Plan to provide for a boosting of housing supply where it is readily apparent that recent rates of completion have fallen substantively short of need. This is illustrated at Figure 3.1 which compares completions since 2014 against the need that has previously been evidenced for this period, in the 2016 Strategic Housing Market Assessment (SHMA) and its subsequent addendum⁴.

⁴ GL Hearn (January 2016) Mid Mersey Strategic Housing Market Assessment; GL Hearn (October 2016) Mid Mersey SHMA: Addendum for Warrington

Figure 3.1: Evidence of a growing shortfall



Source: Annual Monitoring Report, Calculation of the standard method need

3.39 This confirms that over this period the scale of the shortfall of homes has grown, such that it stands now at over 2,000 homes when assessed against the Council’s own assessment of need over this period. It is important to observe that it is necessary to benchmark against this need figure where the authority has not had an up-to-date or adopted housing requirement in place.

3.40 The serious consequences of the shortfall in supply on the residents of Warrington is apparent when considering a number of market signals considered in the latest LHNA Update (2021), including:

- It is identified that there are currently 5,200 households in Warrington living in unsuitable housing (or without housing)⁵;
- Two-fifths of newly forming households will be unable to afford market housing (to rent privately)⁶; and
- A mid-market home in Warrington cost the average worker the equivalent of as many as 6.75 years’ earnings in 2019. This was some 30% more than a decade earlier, the ratio having increased in this time at more than double the rate recorded across the North West (13%) despite having started from an almost identical base⁷. It is acknowledged that the ratio has fallen from the record high seen in 2019, but the resultant figure of 6.27 years remains higher than recorded

⁵ Warrington Local Housing Needs Assessment Update (August 2021), GL Hearn, Paragraph 8.37

⁶ *Ibid*, paragraph 8.51

⁷ ONS (2021) House price to workplace-based earnings ratio, median

in all but the three latest of the past ten years, and is still around 9% above the regional average.

- 3.41 Where it is evident that many households are facing challenges in accessing the housing market as a result of the comparative price of entry the Council's proposed unambitious approach to plan to provide for a need below even the minimum level established under the standard method will do little to positively address these challenges. Indeed on the basis of the historic evidence above it will be more likely to exacerbate it.
- 3.42 It is nonetheless acknowledged that the PPG does provide the following guidance on when a stepped housing requirement could be considered appropriate:

*"A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs"*⁸

- 3.43 The onus is on the Council to justify a stepped trajectory rather than accept this as a consequence of the selection of sites. The Council should seek to avoid a stepped trajectory if possible and, to the extent that development options would achieve this, that should be acknowledged positively in the Council's appraisal of those options.
- 3.44 There has been no housing requirement written into an adopted development plan policy since the revocation of the Regional Strategy for the North West in 2013. There is therefore no claim of a 'significant change' in housing requirements justifying this approach by the Council. Instead the Council has determined that the stepped requirement is justified by reference to the allocation of strategic sites which have a long lead in time meaning needs cannot be met early in the plan period.

Consideration of specific sites

- 3.45 The above may provide the basis of a justification but it needs to be considered in context and should be used as a last resort if credible alternative options which avoid the need for a stepped trajectory do not exist. To this extent, the benefits of those alternative options in reducing reliance on a stepped trajectory must be given weight in the planning balance.
- 3.46 In this regard, the SWUE, previously proposed as a development plan allocation, is a readily developable site, able to provide up to 25% of its planned dwellings (some 445 residential units) prior to the development of the Western Link Road without giving rise to severe impacts on the existing highway network. This is evidenced within the

⁸ PPG Reference ID: 68-021-20190722

Transport Assessment which forms part of the body of technical work presented alongside the Development Prospectus for the SWUE site.

- 3.47 There are no other impediments to early delivery of the development. The major landowners and promoters of the SWUE have each submitted a signed Memorandum of Understanding setting out a commitment to collaborate in the masterplanning and delivery of the site to ensure it comes forward in a coordinated and sustainable manner. This is Appended to this Paper at Appendix 6
- 3.48 Whilst presently located in the Green Belt, the site benefits from existing direct access points off the highway network (the A56 and Runcorn Road) and is not reliant on significant infrastructure to bring early phases forward. Whilst the provision of a Local Centre and primary school need to be designed into the scheme, there is no overriding reason why these would be required at the outset instead are expected to come forward as part of later phases.
- 3.49 Allowing for the development and Council endorsement of a detailed masterplan for the site and preparation and submission of a first phase planning application, it is expected that the first residential units would be delivered on site during 2024 with 300 units being deliverable during the first five years of the plan (to 2026) based on adoption of the plan in 2023. The site can deliver 60 units during 2023/24 and 120 each in 2024/25 and 2025/26 applying the build rate assumptions adopted by the Council. This compares to the delivery of just 90 units at the SEWUE during the same five year period.
- 3.50 The allocation of SWUE is included in three of the five development options considered by the Council in the development of the PSLP 2019⁹ (Options 1, 4 and 5). Its relative merits are therefore intended to be assessed against those of others through the appraisal process. In doing so, the Council has failed to consider this particular issue in the appraisal the SWUE, representing a significant deficiency in the process of defining and assessing the relative merits of options. In contrast, it has placed weight on the ability of Thelwall Heys (Policy MD5) to contribute to meeting needs during the early years of the plan period (and ultimately in selecting that site for allocation) indicating an inconsistency in approach.
- 3.51 In this context, options which include the SWUE would perform favourably against other options, particularly those including the SEWUE, which the Council has concluded can deliver only 90 units during the first five years of the PSLP. The selection of this site for allocation is a key factor in the Council progression with a stepped trajectory which results in a five year requirement of some 17% below the proposed average annual requirement for the PSLP.
- 3.52 To address this issue, the various spatial options must be re-assessed by the Council with delivery during the first five years of the plan taken into account and given weight in the relative appraisal of the options, including an acknowledgement of the SWUE's benefits in this regard. This is a material consideration in the appraisal of options in the interest of minimising the extent to which the PSLP needs to proceed on the basis of a stepped trajectory which otherwise results in the plan not meeting requirements

⁹ Development Options and Site Assessment Technical Report para 4.34

during the first five years. This is in the spirit of paragraph 60 which sets out the objective of boosting housing delivery through bringing sufficient sites forward **without unnecessary delay**.

- 3.53 In the context of this objective, there can be no question that the ability of different options to minimise the extent to which development needs will not be met over the first five years of the plan must be a consideration in the appraisal of those options. This is only reinforced by reference to the years of under delivery witnessed in Warrington as noted above. When this consideration is properly input to the appraisal process, the assessment would report that the development options which include SWUE as an allocation perform favourably on this point given the above delivery trajectory during the first five years of the plan relative to that of other sites considered.
- 3.54 The PSLP's failure to properly take this into account reflects a deficiency in the evidence base. The PSLP is not justified and is unsound as a result.

4. Housing need beyond the plan period

- 4.1 In accordance with paragraph 140 of the NPPF, a critical issue for the Local Plan is the question of whether the Green Belt can endure. Paragraph 140 gives very clear direction to the effect that through the development of 'strategic policies' the Council must consider the need for changes to the Green Belt now in order to provide certainty that they will not need to be subject to further amendment 'beyond the plan period'.
- 4.2 This requires a consideration of potential development needs beyond the plan period and the sources of non-Green Belt land which may be available to meet those needs. This is a subjective exercise and requires a judgement call based on the evidence available.

Need beyond the plan period

- 4.3 The Council uses a number of unsubstantiated points to arrive at a conclusion that housing requirements will contract looking ahead to beyond the plan period.
- 4.4 Firstly it determines housing needs beyond the plan period by reference to housing needs from the part of the plan period when these are projected to be lowest and assumes this will be reflective of need in the years beyond the plan period. The average annual requirement over the plan period based on the Standard Methodology (SM) and without any uplift is 816 dwelling per annum. Whilst the rate of household formation is expected to fall during the latter years of the plan period, based on the SM, there is presently no evidence to indicate that this will be maintained beyond the plan period. By their very nature, projections are uncertain and household formation rates will vary over the long term.
- 4.5 Secondly the Council makes the sweeping statement that housing price affordability will no longer be a significant issue beyond the plan period through the positive effect of the plan and providing a 'positive plan for growth.'¹⁰ Whilst inherent within the SM is an allowance for affordability pressures, there is simply no basis to conclude that affordability issues will be eradicated, or will not emerge, in the years after the plan period with any reasonable degree of certainty. This has not been subject to any analysis by the Council.
- 4.6 On the contrary, this representation has highlighted flaws in the Council's approach to calculating the plan period housing requirement and particularly the failure to have any regard to the effects of a positive and ambitious employment growth strategy inherent within the plan and its impact on housing need (see Paper 2).
- 4.7 If the employment strategy is effective, which one must assume it will be to pass the tests of soundness, the Borough's baseline economy and the number of jobs it supports will be significantly higher in 2038 than in 2021. It is inconceivable in that context that post-plan period housing requirements will be maintained at barely 600 dwellings per year, when this figure itself is linked to a SM methodology requirement

¹⁰ Development Options and Site Assessment Technical Report Paragraph 5.11 (Warrington Council September 2021)

which has had no regard to the impact of the Local Plan's positive economic growth strategy.

- 4.8 In this instance, plan period investments will lay the foundations for a highly performing economy, which will in turn attract further investment and job creation. The Borough's strategic assets, and particularly its connectivity (including future improved connectivity through an improved West Coast mainline resulting from HS2) and location within the chain of high performing economies in this part of the North West region, put its economy in a strong position to grow substantially for many years, and well beyond the plan period.
- 4.9 The success of the Local Plan will have realised a larger Borough and higher performing economy, setting a new baseline from which future development requirements will be determined. There is no justified reason to conclude that the economic success story of Warrington will then stop or even slow down. Housing pressures and the need for housing will similarly be maintained in this context.
- 4.10 Paragraph 140 of the NPPF is concerned with the amendment to Green Belt boundaries and sets out a requirement to approach the exercise of redrawing Green Belt boundaries to ensure they can endure over the long term. Satisfying this test places a high burden of proof on the Council to demonstrate the long term endurance of the Green Belt is secured through the strategy pursued. This test requires there to be a high degree of certainty that the post-plan period development needs will not be significantly different to those proposed. Any risk and uncertainty in that regard poses a threat to Green Belt and its long term endurance, at odds with paragraph 140 of the NPPF.
- 4.11 Given the nature of this test, and the desired outcome, it is insufficient to approach this exercise by relying on largely baseless conclusions about post-plan period need.
- 4.12 As a minimum the PSLP should proceed on the basis that the SM requirement continues to apply beyond the plan period.

Supply beyond the plan period

- 4.13 The Council identifies that the plan period flexibility allowance of 1,948 units is effectively available to meet needs beyond the plan period – presumably either because that level of supply will naturally be held back by the market or if delivered during the plan period, will mean a commensurate reduction in need after the plan period.
- 4.14 It is inherent within the PSLP 2021 that total delivery over the plan period will reflect the full extent of the supply identified including the flexibility allowance of 1,948 dwellings. The flexibility allowance is not subject to a separate land designation and so no part of the supply is artificially held back in reserve. Rather the PSLP 2021 assumes all allocated land will be delivered over the plan period, aside from some later delivery at Fiddlers Ferry, the SEWUE and Warrington Waterfront which is has no connection to the flexibility allowance.
- 4.15 The strategy pursued by the Council is proof that previous years delivery is of little material relevance to the determination of future needs to be met through the Local

Plan, other than to the extent that the SM is based on past household growth. In the case of Warrington, recent under delivery (554 dwellings per annum on average over the last 13 years 2008/09 to 2020/21)¹¹ is not factored directly into its plan period requirement (i.e. as a step to address the backlog).

- 4.16 This works both ways. Should all land supported by the Local Plan be delivered over the plan period, then the flexibility allowance will not be available to deliver after the plan period and indeed its delivery over the plan period will not have the effect of reducing requirements after the plan period. Need will be recalculated at that point without direct reference to any consideration of over-delivery in previous years. On the contrary, past over delivery will only serve as an upward influence on the calculation of requirements for the next plan period since it will point towards increased household formation which informs the future requirement.
- 4.17 On the basis of the Council's expectation that all the identified plan period supply will be delivered by 2038, the flexibility allowance should be removed from the calculation of post-plan period supply.
- 4.18 Having regard to the above points, Peel does not agree with the Council's conclusion that there is no requirement to release land from the Green Belt specifically to meet development needs beyond the plan period. The Council has not satisfied the requirements of paragraph 140 of NPPF and is unsound as a result.
- 4.19 Without prejudice to the position set out above regarding plan period need and supply, in order to address this point of soundness, the PSLP would need to proceed on the basis that at least 9,792 dwellings will be needed post-plan period up to 2050. This is based on 816 dwelling per year (the current SM output) and compares to the Council's proposal of 7,406 dwellings per year. The post-plan period supply should be reduced by 1,948 dwellings to reflect the PSLP's assumption that all sites identified as part of the supply will be delivered during the plan period.
- 4.20 On this basis, a revised version of Table 4 from the Development Options and Site Assessment Technical Report (September 2021) is presented below.

¹¹ See Page of the Annual Monitoring Report 2020 [AMR 2020 Final Report \(warrington.gov.uk\)](https://www.warrington.gov.uk)

Table 4.1: Revised calculation of post plan period need and supply

Indicative housing requirement 2037 to 2047	
a) Annual housing requirement 2038 to 2050	816
b) Overall housing requirement 2038 to 2050	9,792
Indicative housing supply	
c) Garden suburb delivery post 2038	1,800
d) Fiddlers Ferry delivery post 2038	450
e) Waterfront delivery post 2038	265
f) Assumed brownfield development	3,028
g) Total indicative supply (b-c-d-e-f)	5,543

- 4.21 On the basis of the above, the PSLP needs to identify sufficient land capable of delivering 4,249 dwellings beyond the plan period (Table 4.1 b - g) in order to satisfy the requirements of NPPF paragraph 140. It can do so through the allocation of safeguarded land to this level. Failure to plan for the post-plan period requirements on this basis means the PSLP is otherwise unsound on this point, being in conflict with NPPF.

Distribution of safeguarded land

- 4.22 A key consideration in selecting land for safeguarding is to ensure that this is distributed appropriately. A future consideration of housing distribution will be a key part of the next Local Plan and to reduce the prospect of there being a requirement for a future Green Belt review, it is important that the distribution of safeguarded land is properly considered at this stage.
- 4.23 Whilst the current Local Plan should not pre-empt the future Local Plan in that regard, a reasonable approach would be to seek to ensure that the distribution of post-plan period supply is broadly proportionate to the scale of settlements in the Borough – i.e. a neutral, middle ground approach.
- 4.24 In this context, it is noted that all the identified land which will continue to deliver after the plan period is located on the edge of the main settlement of Warrington (i.e. as extensions to it) accounting for some 2,515 units.
- 4.25 Whilst the assumed post-plan period brownfield yield of 3,024 does not relate to specific sites, it is estimated that of the SHLAA supply identified by the Council (i.e.

non-Green Belt sites), which make up the plan period supply, 99% of this is located in the main settlement of Warrington with the Outlying Settlements accounting for just 98 units of this supply.

- 4.26 It is reasonable to assume this pattern will continue in respect of any future supply which emerges in the urban area after the current plan period. As such, it is highly likely that of the assumed post-plan period brownfield supply of 3,024 units, very little, if any, of this will come from the Outlying Settlements.
- 4.27 As such, there is effectively no provision for ensuring the Outlying Settlements post-plan period needs are catered for. Clearly these settlements will have development needs beyond the plan period (even if this were maintained at the 'incremental' level proposed through the PSLP). The effective result of this is that it is inevitable that the Green Belt boundaries around the Outlying Settlements will not endure beyond the plan period based on the strategy being pursued and even if no adjustments to the figures are made. This represents a further evidenced conflict with paragraph 140 of NPPF.
- 4.28 To address this, the PSLP will need to identify a supply of sites adjacent to the Outlying Settlements which will ensure their proportionate share of post-plan period needs can be met. This exercise should be approached on the assumption that brownfield development opportunities in the post-plan period within Outlying Settlements are negligible for the reasons evidenced above. Based on a need for the PSLP to make provision for a post-plan period need of 9,792 dwellings, 10% of this should be explicitly identified in Outlying Settlements, reflecting their proportionate existing population relative to the Borough as a whole.
- 4.29 For the reasons noted above, this will require the release of land from the Green Belt which is capable of accommodating this level of development and its allocation as 'safeguarded land' to meet needs beyond the plan period. A failure to take this step will inevitably result in a need to review the Green Belt as part of the next Local Plan reflecting the scarcity of development opportunities in the Outlying Settlements. This is therefore necessary to satisfy the requirements of paragraph 140 of the NPPF.

5. Definition and appraisal of Development Options

- 5.1 The PSLP 2021 marks a significant step-change from the 2019 equivalent, reflected in a reduced housing requirement (by some 14%), a significant reduction in the scale of housing to be delivered at the former Garden Suburb (now referred to as the South East Warrington Urban Extension (SEWUE) and, in effect, swapping allocations at Port Warrington and SWUE for employment and residential development respectively for allocations at Fiddlers Ferry Power Station and Thelwall Heys.
- 5.2 By reference to the Council's 'Development Options and Site Assessment Technical Report' (September 2021), this section of Paper 1 considers the approach taken by the Council in defining and appraising the various options for the Local Plan, including:
- Establishing the Plan's housing requirement
 - Selecting the spatial strategy for the main urban area

Aligning housing and employment growth

- 5.3 Over the course of the development of the Local Plan, the proposed annual housing requirement has reduced by some 297 dwellings (or 26%) from 1,113 dwellings per annum in the 2017 Preferred Development Options Report to 816 dwellings in the PSLP 2021. The Council's position is now that there is no justification for deviating from the output of the Standard Methodology for the calculation of housing needs by reference to more conservative estimations of employment growth, in part linked to the assumed long term impacts of Brexit and the Covid-19 pandemic.
- 5.4 It seeks to reinforce this justification by reference to uncertainty around the ability of the market to deliver higher level of housing growth in Warrington and concerns raised through the 2019 consultation regarding the scale of housing growth proposed and the impact of this on the Borough's infrastructure, Green Belt and its built and natural environment.¹² The principal reason given for not exceeding the Standard Methodology derived requirement is related to jobs projections and the Borough's economic prospects however.
- 5.5 This is considered in further detail in Paper 2 of Peel's representations. This presents a detailed case for proceeding with an annual housing requirement of a minimum of 1,050 dwellings to ensure that the PSLP housing strategy supports and is complementary to its economic one and particularly that the housing is available to support the employment which will be generated by achievement of the PSLP's economic ambitions. As noted above, these ambitions are fundamentally the same as previous iterations of the Local Plan resulting in a significant level of internal conflict within the plan and its two main areas of focus.

¹² Development Options and Site Assessment Technical Report (Warrington Council September 2021) paragraph 2.3 and 2.7

- 5.6 Put simply, the maintained economic focused ambitions of the Local Plan will not be achieved unless a complementary housing strategy is pursued. It plainly is not. The failure to deliver significant levels of housing of the right type and quality will act as drag on the aspired economic objectives. A failure to recognise this link and instead set out competing economic and housing strategies represents a fundamental point of unsoundness rendering the PSLP ineffective and at odds with the NPPF.

Appraisal of spatial options for main urban area

- 5.7 The Council defines five options for the distribution of the Green Belt release requirement across the main town of Warrington to meet the Borough's housing needs. This appraisal is undertaken by reference to specific sites which would accommodate the development needs identified under the options. This includes the SWUE as one option (Option 1), alongside the SEWUE and, as a separate option, alongside Fiddlers Ferry and Thelwall Heys (Option 4) as well as alongside Fiddlers Ferry only (Option 5).
- 5.8 In the context of representations provided at section 2 of this report, Peel considers that the options are not mutually exclusive – that is to say that there is a need for a substantial increase in the Green Belt release requirement and so more than one of these options needs to be pursued in order to arrive at a deliverable and effective Local Plan.
- 5.9 Notwithstanding this, Peel fundamentally disagrees with the conclusions reached by the Council with respect to the relative sustainability of the different options which is influential in determining which forms the basis of the Local Plan.
- 5.10 A number of conclusions are drawn which do not stand up to scrutiny and run contrary to the prevailing evidence. Most notably, Peel considers that the Council has misrepresented the constraints to development at SWUE (which features in Options 1, 4 and 5) and the impacts which would arise from its development and there is some evidence which indicates that the Council has not undertaken the relative assessments on a consistent basis.

General comments

- 5.11 As a general observation, it is noted that whilst the appraisal represents a consideration of spatial options, this is, in reality, an appraisal of candidate site allocations. Each spatial option is specific about which sites would come forward for development under each scenario and site specific allocations emanate from this process.
- 5.12 In this context, it is considered necessary to have a sufficient understanding of the individual sites, the constraints they each present and any deliverability issues present. This would logically be informed by a body of technical work which would form the basis of the appraisal of each option and which is ultimately relied upon to underpin the conclusions reached in respect of each site.
- 5.13 In this instance, the appraisal of each site is very high level by reference to how each would perform against the Strategic Objectives of the PSLP (W1 to W6). The analysis is not informed by an understanding of each site in environmental terms – particularly

ecologically and in terms of landscape impact. SEWUE is for example supported only by a short document – some 13 pages – which leads up to the presentation of concept masterplan. There is no assessment of site constraints and testing of options for access. The technical evidence base underpinning the selected of sites, and proof that they represent the most sustainable in the round, is presently lacking. The PSLP is not sound at the present time in not being justified by reference to an effective evidence base.

- 5.14 Peel reserves the right to provide further comments on these proposed allocations when the aforementioned technical and environmental evidence is made available as is required.

Appraisal of SWUE options

- 5.15 With regards to the SWUE, the Council’s appraisal draws the following conclusions:

- SWUE, if allocated at the expense of Fiddlers Ferry, would not enable the regeneration of the power station site. The same applies to SEWUE.
- There is insufficient capacity within existing secondary schools to meet the needs of the development (in the context of the proposal not including the provision of a secondary school itself)
- The development, in the context of it coming forward alongside Fiddlers Ferry, would *‘impact on the Green Belt separating Warrington and Halton’*¹³ and offers no longer term potential beyond the plan period (meaning safeguarded land would need to be allocated in another location)
- The Council has concerns about the impact of SWUE on the Western Link highways proposal.

Green Belt

- 5.16 In relation to SWUE, the Council’s assessment concludes:

‘It is essential that a robust boundary is provided to support the strategic function of the Green Belt in this location in ensuring separation between Warrington and Runcorn. This needs to be considered with the potential proposed waterfront and in the context of Halton proposing to remove Moore Village from the Green Belt through their Local Plan Review’¹⁴

- 5.17 In considering an option of the allocation of SWUE and Fiddlers Ferry the assessment states that:

¹³ Development Options and Site Assessment Technical Report paragraph 4.46 (Warrington Borough Council September 2021)

¹⁴ Development Options and Site Assessment Technical Report Appendix 5 page 2 (Warrington Borough Council September 2021)

'This option includes the release of Green Belt in the direction of neighbouring Halton in both the north towards Widnes and south towards Runcorn. The cumulative impact of this and the impact on separation between the towns in the two Boroughs is an important consideration for this option'¹⁵

- 5.18 That the SWUE will release Green Belt land in the direction of Moore Village, reducing the separation between Moore Village and the newly drawn urban boundary of Warrington is specifically highlighted in the context of the intention to take Moore Village out of the Green Belt through the Halton Local Plan Review.
- 5.19 The Halton Local Plan Review is proposing this step to reflect the extent of built development at Moore Village and that this is at odds with it being in the Green Belt. It also reflects that areas of land around Manor Business Park to the immediate north west of Moore Village comprise open space and Local Wildlife Sites and are therefore protected from development by other policies. With the exception of small expansion of Manor Business Park into existing Green Belt to the east, this is no more than a corrective step taken to better reflect the form and extent of built development in this location, the character of the land and the extent to which it is protected from development by other policy provisions.
- 5.20 In taking Moore Village out of the Green Belt, this revision does not open up significant development opportunities to the extent that it could lead to the outward spread of the existing built up area in the direction of Warrington. Development opportunities arising from this would be largely limited to infill plots within the built up area of the village.
- 5.21 This step will not change the extent and scale of Moore Village and little impact will be felt on the ground. It will not extend the spatial extent of Moore Village outwards and there will be no reduction in the actual gap between the built up form of Moore Village (as existing) and the urban boundary of Warrington. It will be a change visible in plan form only.
- 5.22 In considering SWUE in the context of the removal of Moore Village from the Green Belt, as the Council's assessment advises, it is evident that this release is of no material significance. Given the nature of this release and the negligible impact it will have on the ground, this should have no bearing on the consideration of whether SWUE is acceptable from a Green Belt point of view. Any consequential narrowing of the gap between settlements in Warrington and Halton arises only from the release at SWUE and is not exacerbated by a release at Moore Village as appears to be what the Council is alluding to.
- 5.23 Taking the SWUE release in this context gap of some 800m to Moore Village will remain. The physical separation to Moore Village (as an area of built development) is unaffected by the removal of Moore Village from the Green Belt. A defensible boundary formed by Bellhouse Lane would be provided between the south western

¹⁵ Development Options and Site Assessment Technical Report Appendix 5 page 2 (Warrington Borough Council September 2021)

extent of Warrington and the north eastern boundary of Runcorn following the release of SWUE from the Green Belt.

- 5.24 The revised Green Belt boundary at Moore Village is illustrated through Figure 5.1 below.

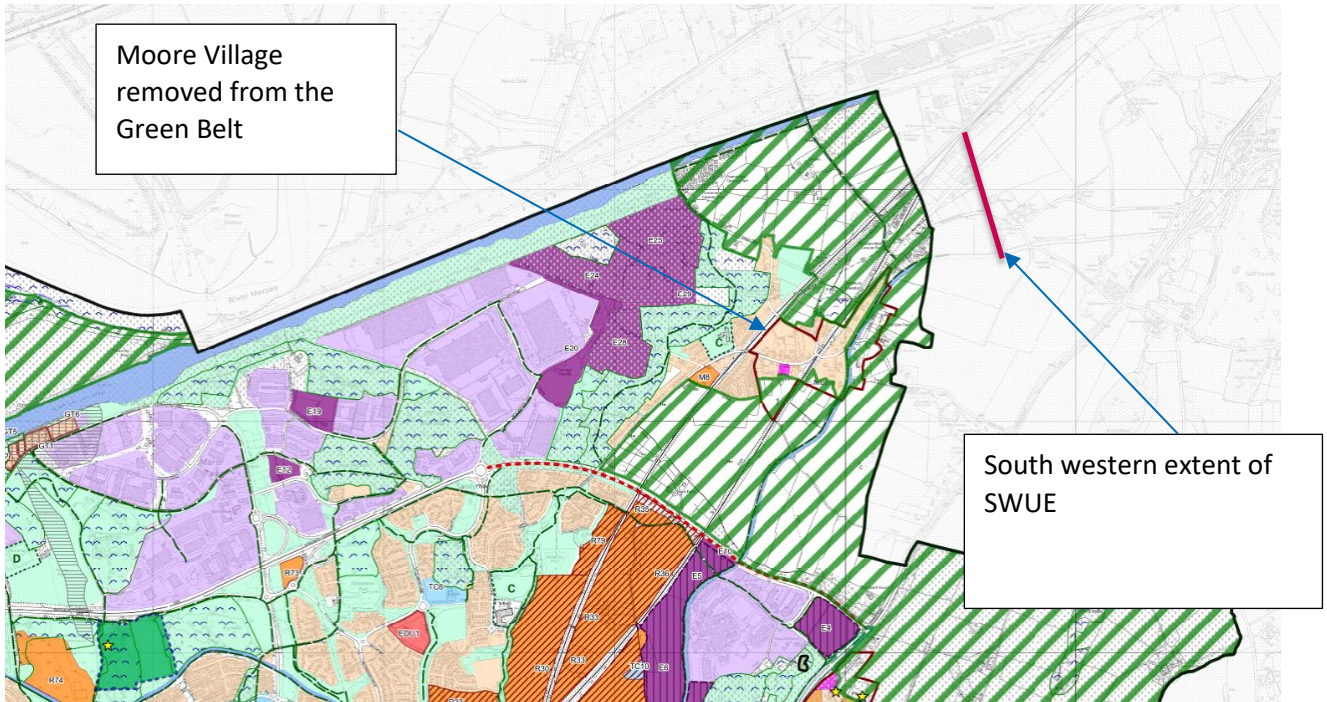


Figure 5.1: Revised Green Belt at Moore Village

- 5.25 By contrast, the SEWUE proposes an easterly expansion of the urban area of Warrington in the direction of Appleton Thorn – a standalone settlement surrounded by Green Belt and isolated from the main urban area. It is similar in scale to Moore Village in that regard and has a similar relationship with the main urban area, albeit located in Warrington rather than Halton. The SEWUE will substantially close any gap between Warrington and Appleton Thorn with the latter effectively being subsumed into the urban area. The proposed release retains a gap of just 350m between Warrington and Appleton Thorn with no defensible boundary between the two.
- 5.26 Given this comparison, it is very evident that two sites have not been assessed on a consistent basis. Whilst issues are raised in relation to SWUE’s potential impact on Moore Village from a Green Belt point of view, no such issues are raised in relation to the SEWUE and Appleton Thorn. Rather the Council’s assessment simply concludes:

The South East Urban Extension provides the opportunity to amend the existing Green Belt and to make use of the weakest Green Belt parcels in this location, together with the loss of some moderately performing parcels. The urban extension lends itself to the use of defensible existing features as robust boundaries, or where this is not possible, there is the opportunity to strengthen existing boundaries to ensure the permanence of revised Green Belt boundary in the long term.

5.27 The revised Green Belt boundary to the east of Warrington, and its relationship with Appleton Thorn, is shown in Figure 5.2 below.

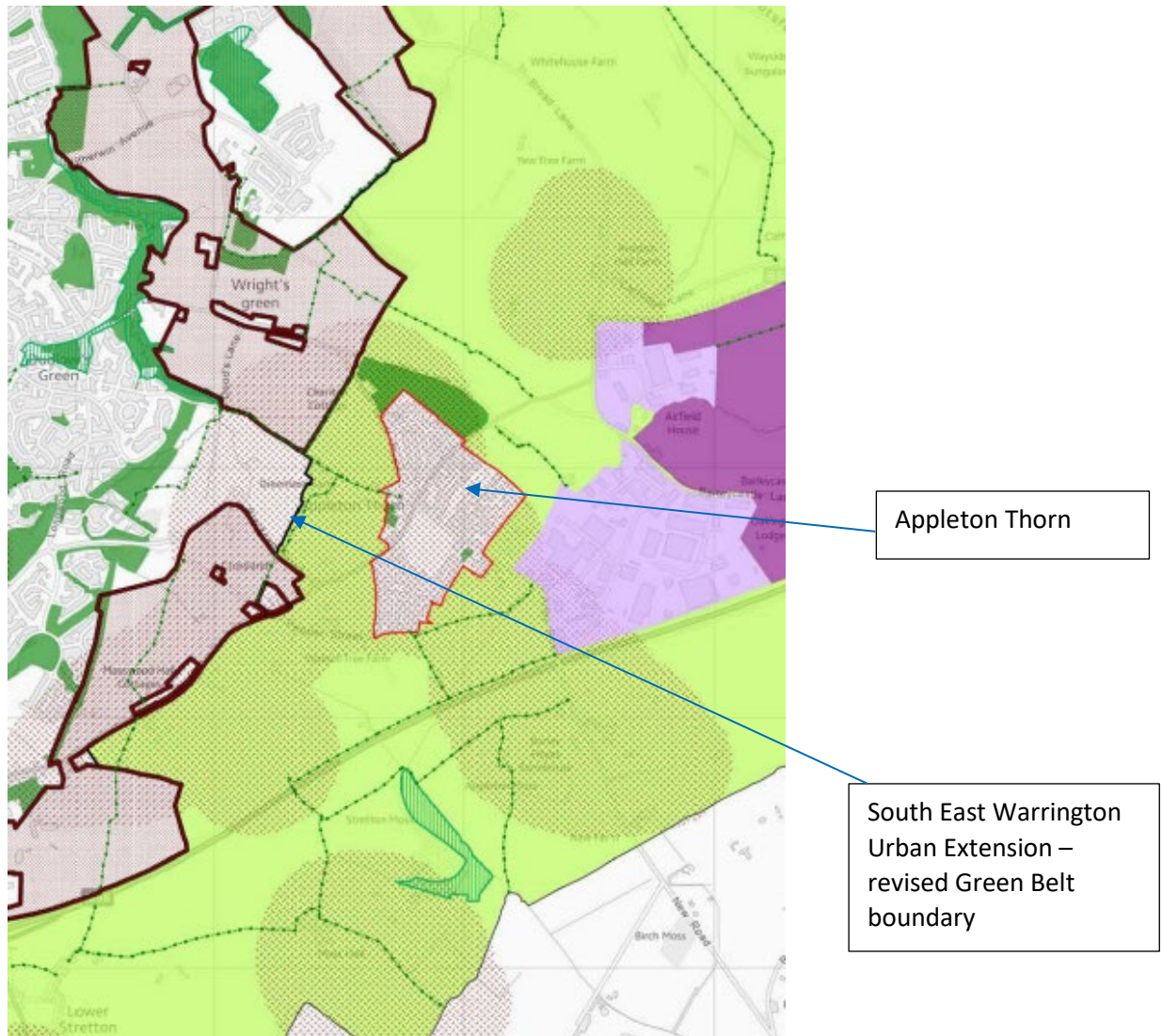


Figure 5.2: South East Warrington Urban Extension – impact on Appleton Thorn

5.28 The positive tone of the above commentary is in stark contrast to the equivalent commentary on SWUE where defensible boundaries are already pre-existing and don't need to be built into the development in the manner required at the SEWUE. The respective appraisals are, at best, inconsistent in drawing the conclusion that the SWUE will give rise to harm to the Green Belt which SEWUE will not. Considered on an objective basis, and taking the issue of Green Belt alone, that is not a fair and reasonable conclusion to draw.

5.29 On the contrary, when one considers the key Green Belt concern raised by the Council in respect of SWUE (that being its relationship with Moore Village) it is evident that the SEWUE has a significantly more harmful effect on Appleton Thorn. That the Council has set this aside is seemingly owing to the former being raised by Halton Council through its representations to the Local Plan and the Duty to Cooperate. To the extent that the

Green Belt will be harmed by the two development options, it is clear that the greater harm arises in respect of SEWUE on account of its relationship with and impact on Appleton Thorn.

Highways impacts

- 5.30 As noted above, a key reason for discounting options which include the allocation of the SWUE is its claimed impact on the proposed Western Link relief road proposed to relieve congestion in and around the town centre via a new road connection between the A56 (Chester Road) and A57 (Great Sankey Way). The projected cost of the link road is £212m with £142.5m of funding for its delivery being conditionally secured through the Department of Transport.¹⁶ A key aim of the link road is to unlock development sites in and on the edge of Warrington. The southern termination of the link road where it connects with the A56 is within the SWUE site area.
- 5.31 The technical appraisal provided at Appendix 1 demonstrates that the development of the SWUE will not give rise to unacceptable impacts on the Western Link and can be accommodated in full through the development of the Western Link, to which it can make a contribution towards the delivery of. The Council's evidence base does not support the conclusion reached regarding the impact of the development on the Western Link. This is a significant deficiency given the significance of this conclusion on the decision to discount the SWUE in favour of other development options. This decision is very clearly not justified and so is unsound.

Delivering the Western Link

- 5.32 The PSLP is substantially reliant on the delivery of the Western Link to unlock development capacity in the town centre and at Warrington Waterfront.
- 5.33 The 2019 PSLP proposed that the SWUE site, as proposed for allocation at the time, would be one of three allocations which would make a proportionate contribution towards the delivery of the Western Link in order to help meet a £70m funding shortfall. This was a key component of the delivery strategy for the link road. Two of these allocations, Port Warrington and the SWUE, are now no longer proposed in the PSLP 2021 with the only remaining site which is identified as making a contribution to the Western Link being the Warrington Waterfront residential proposal (providing an estimated 1,070 dwellings over the plan period and representing a small proportion of the overall plan requirement). It is noted that the Council's viability appraisal reports that development at the Waterfront is unviable and so its ability to contribute to the Western Link is, at best, in doubt.
- 5.34 The Council previously settled on a strategy of developer contributions as part of its plan to deliver the Western Link and identified this as an appropriate means by which this would be achieved having considered other options. The Council is now closing off a critical funding stream in no longer proposing the allocation of Port Warrington and SWUE. In doing so, it has failed to recognise this particular benefit of these sites – in having a direct relationship with the Western Link and therefore justified in making a contribution to it – in the appraisal of development options and its conclusions regarding the merits of these site options relative to others. That represents a clear

¹⁶ [Western Link | warrington.gov.uk](https://www.warrington.gov.uk)

deficiency in the PSLP evidence base which does not provide a justified basis to underpin the options selected as a result. In short the selected option is unsound on this basis.

5.35 This is further highlighted by reference to the Sustainability Appraisal. This is an important part of the evidence base to the Local Plan in presenting a comprehensive comparative assessment of all development options against a pre-defined framework. One sustainability 'theme' identified in the SA framework is accessibility, with two SA objectives, against which options are assessed, emanating from this. This includes SA objective 9 to 'protect and enhance accessibility for all the essential services and facilities'.

5.36 The 2019 SA assessed development options which included the SWUE against this objective and recognised the beneficial impacts of this site arising from the contribution it would make to the delivery of the Western Link through a planning obligation. In relation to the SWUE it states:

*'... development here would contribute towards and benefit from the completion of the Warrington Western Link road. This would achieve links to the wider Waterfront area and help to manage effects on the road network. Consequently, this provides the potential for a significant positive effect.'*¹⁷

5.37 Its conclusion in relation to Option 1 (which includes the SWUE) against this SA objective is:

*'Overall, a significant positive effect is predicted for Option 1. This is related to several factors, but notably the potential for major improvements to transport networks in support of new development at both strategic locations.'*¹⁸

5.38 The SA in 2019 has very evidently, and quite rightly, recognised the benefit that the SWUE will bring in helping to facilitate the delivery of the Western Link. It placed significant weight on this in drawing its overall conclusion on the very positive performance of Option 1, which includes the SWUE, against SA Objective 9.

5.39 By contrast, the 2021 SA plays this down. It does not appraise spatial options which include a defined combination of sites in the manner of the 2019 rather looks at each site within each option independently, resulting in an overall 'minor positive' scoring against the accessibility theme for the SWUE. Passing reference is made to the ability of the development to contribute to the Western Link but this is dismissed as of limited relevance in the context of a conclusion that the development will give rise to increased congestion. This was not raised as issue in the 2019 SA.

5.40 As reported above, and detailed within the technical notes at Appendices 1 and 3, there is no credible basis for concluding that the highway impacts of the SWUE will be unacceptable. The evidence provided alongside the PSLP 2021 does not support the

¹⁷ Warrington Local Plan Review Pre-submission Sustainability Appraisal SA Report (AECOM March 2019) Appendix F (page 264)

¹⁸ Warrington Local Plan Review Pre-submission Sustainability Appraisal SA Report (AECOM March 2019) Appendix F (page 264)

revised judgement in the SA that the accessibility effects of the development will only be 'minor positive' as a significant deviation from its previous judgement. That previous judgement reflects the significant benefit of the development arising from its contribution to the Western Link. Nothing has changed in that regard and there is no basis for revised SA scoring against the accessibility theme.

- 5.41 On the contrary, in the context of a proposed reduced housing requirement, and an increased proposed reliance on areas of the Borough where development viability is, at best, marginal, the fact that the SWUE can make a financial contribution towards the Western Link should in fact mean that more positive weight is placed on this benefit in the appraisal process. The SA scoring of this site should be updated to 'major positive' against the accessibility theme to reflect this.

Secondary school provision

- 5.42 The Council's appraisal of options which include the SWUE indicates a secondary school capacity constraint in the south of the Borough, though has presented no evidence to support this position. Peel has commissioned its own evidence in relation to this matter, provided at Appendix 2. This demonstrates that there are no significant secondary school capacity constraints to development at the SWUE. It notes that:

- There are fewer pupils registered to secondary schools in Warrington than were forecast in 2019. This is likely to mean increased capacity looking ahead
- Given the phased nature of housing delivery, demand for school places arising from new housing development will not peak until later in the plan period with forecasts indicating increased capacity in local schools over the long term
- There is a high level of 'in-commuting' of pupils to local secondary schools (including from other Local Authority areas) which will be corrected over time through the effect of new housing development and so releasing capacity
- Whilst a short term issue may arise in respect of capacity in schools in the south of the Borough if the proposed school at the SEWUE did not come forward, this would be addressed over time based on current projections and in the short term pupils could be accommodated in schools just to the north of the Manchester Ship Canal or, alternatively, via an extension to Lymm High School.

- 5.43 This evidence base demonstrates that secondary school capacity is not a significant constraint to the SWUE. Whilst the site will not accommodate a secondary school itself, there is projected to be sufficient secondary capacity from existing schools in the long term to meet demand. The Council's conclusions in relation to this matter are unsubstantiated and run contrary to the evidence Peel has presented in this representation. Secondary school capacity does not provide a reason for rejecting the SWUE proposal as a reasonable alternative to that selected.

6. The case for the South West Urban Extension

To meet the residual need

- 6.1 Sections 1 to 4 of this Paper, and drawing on Papers 2 and 3 have identified that there is a requirement for the allocation of additional land for residential development in order that the development needs of the Borough can be made. This can only be met through the release of additional land in the Green Belt.
- 6.2 The PSLP rightly places a focus on delivery within and on the edge of the main urban area of the Borough, reflective of its inherent sustainability in accommodating growth being most accessible, closest to key services and located where it can generate the greatest benefit in supporting the town centre regeneration ambitions embedded in the PSLP. In this context, the first priority for meeting the residual need should be given to sites on the edge of the urban area.
- 6.3 In this context, the Council has previously concluded, through the evidence base to the 2019 PSLP, that the SWUE represents a sustainable and suitable site to meet the then higher development needs.
- 6.4 Through a consortium of developers with an interest in this site, a deliverable masterplan is presented within an up to date development prospectus submitted alongside these representations. This is supported by a body of technical work which demonstrates that the site is not affected by any insurmountable constraints which would prevent it from coming forward. A summary of this evidence base is provided at Appendix 5. The evidence provided at Appendix 4 of this Paper demonstrates that the site is viable and can make a contribution to meeting the affordable housing needs of the Borough and strategic infrastructure needs of the Local Plan.
- 6.5 The consortium of developers have signed a Memorandum of Understanding (provided at Appendix 6) outlining a commitment to work collaboratively to bring the site forward in a timely and coordinated manner. This demonstrates a high level of commitment and provides added reassurance that a comprehensive approach will be taken to ensure the site is effectively masterplanned and infrastructure delivered through the development at the appropriate time.
- 6.6 The site comprises Green Belt parcels which the Council has determined made a moderate contribution to the Green Belt. Importantly, it is framed by defensible boundaries provided by the Manchester Ship Canal, the West Coast Mainline, the A56 and Runcorn Road. It is well contained by defensible features so as to avoid strategic harm to the Green Belt. This is acknowledged at paragraph 3.13 of the Council's 2019 Development Options and Site Assessment Technical Report. Nothing has changed to affect that conclusion. The 2019 Report goes onto confirm that the SWUE is a suitable, available and development site¹⁹. It is noted that this same conclusion is also drawn within the 2021 update to that report²⁰

¹⁹ Appendix 3 page 7

²⁰ Appendix 5 page 8

- 6.7 Nothing has materially changed to indicate that the SWUE would not be a suitable and sustainable development allocation in the context of a need to identify additional land to meet the housing needs of the Borough, as has been revealed through this assessment.

As a more sustainable alternative

- 6.8 This paper has drawn attention to some fundamental deficiencies in the Council's appraisal of the various development options for the main town of Warrington, particularly in respect of secondary school capacity and highway impact. Put simply, these are not constraints to the development of SWUE and should not be treated as such for the purposes of a comparison appraisal of this site against others. On the contrary, this submission has proven the ability of the SWUE to make a financial contribution towards the Western Link, a piece of strategic infrastructure which underpins the delivery of the entire plan and which would be justified in the context of CIL Regulations given its relationship with the Western Link, should weigh in its favour.
- 6.9 This is particularly the case in the context of this being affected by a c£70m funding gap which through the 2019 PSLP the Council had intended to be partly addressed through a contribution from SWUE and Port Warrington/ Warrington Commercial Park. This source of finance is now not available based on the proposed PSLP 2021, bringing into serious question the deliverability of the Western Link. Whilst it would be a mitigating requirement of the SWUE to make a contribution to the Western Link, this would nevertheless represent a benefit of this proposal given the wider importance of the Western Link to the plan. The Council's failure to acknowledge this and afford this benefit material weight in the appraisal of development options represents a significant procedural deficiency in developing the Local Plan.
- 6.10 This paper has further highlighted a contradiction in the approach to the consideration of Green Belt harm in relation to the effect on similar sized villages located close to the SEWUE (Appleton Thorn) and SWUE (Moore Village). To the extent that it is the role of the Green Belt to maintain a separation between a main urban area and a smaller outlying village, it is evident on any objective level that the SEWUE will have a significantly greater impact the separation of Warrington and Appleton Thorn than the SWUE will have on the separation of Warrington and Moore Village. That Moore Village is located in Halton and Appleton Thorn in Warrington is irrelevant to any consideration of this matter.
- 6.11 This representation has also demonstrated that the SWUE is not affected by any insurmountable constraints relating to highway capacity or secondary education provision, contrary to the Council's claims.
- 6.12 When these matters are considered together, it is evident that even the context of the plan period housing requirement remaining at the level proposed and if the developable supply were accepted (i.e. there being no residual requirement) the SWUE extension represents the most sustainable strategic scale site in meeting development needs, resulting in least harm and creating the greatest benefit locally. It should be prioritised for allocation ahead of other candidate sites including the SEWUE.

An alternative option for the SWUE

- 6.13 The SWUE is in the control of a number of different land owners who are working together to promote this development opportunity. However this is a large area of land which could be reduced in scale if this were appropriate in the context of the housing need and supply position. It is not a given that the SWUE is 'all or nothing' and there is the opportunity to consider a smaller iteration of the SWUE as an alternative, with its allocation redrawn on alternative defensible lines. The former Garden Suburb site, now referred to as the SEWUE, has been redefined and reduced in scale on a similar basis, with options for this reduction and where its new boundary should be drawn considered by the Council through its Development Options and Site Assessment Technical Report (2021).
- 6.14 A smaller SWUE represents a reasonable alternative in the context of the Local Plan and the process of assessing various development options. This has not been considered by the Council as it should have been. Peel considers that, should the housing requirement position not support a full scale SWUE release (which is not Peel's position as outlined in this representation) a smaller iteration could represent a sustainable development opportunity.
- 6.15 The site is noted by the Council as being sustainably located and well related to the urban area in its assessment of those development options which include this site. In this context, and considering the basis on which Thelwall Heys has been allocated for development to meet needs during the early years of the plan period, a smaller allocation at SWUE would represent a reasonable alternative justifiable on a similar basis. This should have been assessed as a development option through the Council's Development Options and Site Assessment Technical Report 2021.
- 6.16 The Council should carry out a process of assessing how the SWUE could be redefined on a smaller basis, reflecting the comments above, in the same manner as the SEWUE (former Garden Suburb). This should include a definition and then appraisal of various options for a smaller iteration of the SWUE.

Potential for safeguarding

- 6.17 This submission has identified that the PSLP 2021 is deficient in its approach towards making provision for development needs beyond the plan period. In order that the PSLP satisfies the requirement of paragraph 140 of the NPPF, additional land is required to be released from the Green Belt and safeguarded to meet longer term development needs.
- 6.18 Setting aside the compelling strategic case set out for the allocation of the SWUE during the plan period, given the Council's judgement that the site is suitable and available, it would be the priority site to be designated as safeguarded land as an alternative.

7. The Outlying Settlements

- 7.1 Peel's submission demonstrates that the Council has not selected the most sustainable sites for allocation compared to reasonable alternatives.
- 7.2 There are alternative sites in the settlements of Culcheth, Croft, Hollins Green and Lymm, which are more sustainable and, in some cases, which result in a form of development which relates far better to the settlement thus representing more logical forms of accommodating growth.

General comments

- 7.3 As a general point Peel does not agree with the Council's proposal of automatically discounting sites which are deemed to make a strong contribution to the Green Belt from the site appraisal process in considering potential allocations. This approach does not reflect that the overall sustainability of a site for development can only be determined through a full consideration of the site's characteristics against a wide range of criteria, consistent with concept of sustainability encapsulating social, economic and environmental dimensions.
- 7.4 The Council's approach runs contrary to the guidance in paragraph 142 of the NPPF in this regard. Green Belt harm needs to be given the appropriate level of weight alongside wider sustainability considerations in selecting sites for release. It cannot therefore be the sole determinant of whether sites should be considered for allocation as is reflective of the Council's approach.
- 7.5 A summary of Peel's representations in relation to each settlement follows.

Culcheth

- 7.6 Peel's proposal for the allocation of land to the north of Culcheth, including the provision of strategic green infrastructure and local highways improvements, is summarised in section 1. This proposal includes the proposed allocation of a site with a capacity to deliver 300 dwellings during the plan period with a further 300 dwellings beyond the plan period (the latter through a safeguarded land designation) as shown in Figure 8.1.

Council's appraisal of suitability, availability and viability of sites

- 7.7 Peel has undertaken a critique of the Council's appraisal of the proposed site allocation to the east of Culcheth (Allocation OS2) as set out in the Site Proforma Assessment Report. Comments are provided below.

Green Belt

- 7.8 It is noted that the Council's appraisal records the site as making a weak contribution to the Green Belt. Given its physical characteristics and absence of durable boundaries along its extensive boundary with the retained Green Belt, Peel considers that the site makes a strong contribution to the Green Belt. This should then be given due weight in the suitability assessment process.

Landscape and visual

- 7.9 The site sits within Landscape Character Type 2: Mossland Landscape which is assessed as being sensitive to development within the Council's Landscape Character Assessment. Within this character type the site falls within Landscape Character Area 2B: Holcroft & Glazebrook Moss. Landscape Character Area 2B is described as being "open and exposed", with a "general absence of hedgerows and hedgerow trees". The site is valued for its scenic quality and representativeness of the landscape character. A public right of way traverses the landscape to the south of the site within the study area giving some recreational value. The value of the site and its surroundings is considered to be Medium.
- 7.10 There are no public rights of way through the site. The site is clearly visible from Holcroft Lane (the main approach into Culcheth) and from Warrington Road which defines the boundary to Culcheth, offering views east across open countryside. The potential effects of development on visual amenity are considered to be Medium-High.

Site allocation OS2 – other considerations

Connectivity and integration with the settlement

- 7.11 The site selected for allocation does not achieve an effective integration into the existing built environment of Culcheth. It is evidently peripheral to the main settlement area and located beyond an area of playing fields and Culcheth Secondary School which mark the transition between the main built up area of Culcheth and expanses of Green Belt and countryside beyond.
- 7.12 The proposed allocation leapfrogs the natural and well established eastern boundary of the main built up area and will introduce a dense, urban form of development into an otherwise open area. It wouldn't represent a natural, organic outward expansion of the settlement area being significantly isolated and disconnected from it. This is not conducive to the objective of achieving well-designed places through the plan-making process as required by NPPF.

Peel's site North of Culcheth

- 7.13 Peel has put forward a proposal for the release of land from the Green Belt and allocation for a mix of development during the plan period, safeguarded land to meet development needs beyond the plan period, and open space.

Green Belt

- 7.14 The proposed open space designations will provide long term durable boundaries to the Green Belt to the north and east of the proposed developed area. This reinforces Peel's evidenced position that the site should be recorded as making, at most, a moderate contribution to the Green Belt and thus a lesser contribution than the proposed allocated site to the east of Culcheth. This should then be given due weight in the site suitability assessment process.

Consideration of benefits

- 7.15 Weight should also be given to the unique benefits of Peel's proposal in considering the site allocation options. Peel's proposal will deliver significant recreation benefits for the existing community, which are unique to this proposal and should be given increased weight in light of the COVID19 pandemic and the desirability of providing

improved access to high quality open space. These can be secured through bespoke policy requirements. Similarly, Peel's site will secure significant highway improvements to Warrington Road and potentially provide land for the future extension of the high school. Again these are unique to this site and can be secured through the policy allocation.

- 7.16 It is important that the 'added value' attributes of the contender allocations are given due weight in the comparative appraisal of site allocation options. This would weigh in favour of Peel's proposal given its unique qualities in this regard.

Landscape and visual

- 7.17 The site falls within defined Landscape Character 1: Undulating Farmland within the Council's Landscape Character Assessment. This landscape typology is considered to be less sensitive to development than Landscape Character Type 2, within which the selected site allocation falls. Landscape Character Type 1 is wide spread across the borough and Landscape Character Type 2 is rare.

Connectivity with the settlement

- 7.18 In contrast with the site selected for allocation, Peel's proposal represents a natural and logical outward expansion of the settlement, following the form of the historic growth of the settlement over a number of decades and representing a continuation of this. It is effectively knitted into the main urban area, having a significant interface with it and providing numerous points of connection to achieve an effective connection and sensitive integration with the existing urban area and not offending the established character and appearance of the settlement as one appreciates it from key arterial routes.

A long term development opportunity

- 7.19 It is also important that the post-plan period is considered in the selection of sites for allocation during the plan period. As evidenced above, there is a need for the release of land adjacent to Outlying Settlements to meet development needs beyond the plan period and thus to ensure the Green Belt can endure over the long term. The plan period and post-plan period allocations should be considered at the same time and as part of a single exercise to ensure the sustainable expansion of the settlement over the long term. A piecemeal approach should not be taken.
- 7.20 Peel's proposal provides the benefit of presenting a strategy for the long term growth of the settlement, through an initial plan period development and then a natural and logical second phase of development beyond the plan period utilising land to the west.
- 7.21 The proposed PUSLP allocation does not present an equivalent opportunity to build on the existing development in a sustainable manner. The further outward expansion of allocation OS2 would take in open Green Belt land and reinforce the development's physical disconnection and isolation from the main settlement area. In the context of a need to allocate land to deliver development needs beyond the plan period, the selected allocation does not present an opportunity for additional sustainable growth beyond 2038 in the manner of Peel's proposal therefore.

Taking these points together, it is clear that Peel's proposed development north of Culcheth presents a more sustainable and more suitable allocation to deliver both

the plan period and post-plan period needs of the settlement compared to the selected site allocation OS2. Peel's site north of Culcheth should be allocated for the development of 300 dwellings during the plan period (eastern parcel) plus a further 300 dwellings beyond 2038 through a safeguarded land designation (western parcel). This approach is consistent with the PUSLP's strategy of incremental growth within the Outlying Settlements.

Croft

7.22 Peel's proposal for the allocation of land at Lady Lane, Croft, is summarised in section 1. it comprises a proposed plan period allocation of 83 dwellings with the balance of the site safeguarded to meet development needs beyond the plan period (with a capacity of 112 dwellings). This enables a version of Peel's proposal consistent in scale with the allocation proposed in Croft through the PUSLP to be considered against the selected site on a like-for-like basis. This then allows an assessment of whether, in the context of a continuation of a strategy incremental growth within the Outlying Settlements, the selected allocation in Croft is the most sustainable compared to reasonable alternatives.

Council's appraisal of suitability, availability and viability of sites

7.23 Peel's assessment of the Council's appraisal of its proposed development site and that of the proposed site allocation to the north west of Croft (Allocation OS1) as set out in the Site Proforma Assessment Report demonstrates that suitability scoring should be revised as follows:

- **Site OS1:** The '*physical point of access into the highway*' scoring should be amended from an **amber** score to a **red** score
- **Site OS1:** The '*use of previously developed land*' scoring should be amended from a **green** score to an **yellow** score
- **Lady Lane:** the '*remediation opportunity*' scoring should be amended from an **amber** score to a **yellow** score
- **Lady Lane:** The '*impact on wildlife sites, local nature reserves, RIGs, potential wildlife sites etc*' scoring should be amended from an **orange** score to a **yellow** score
- **Lady Lane:** The '*physical point of access into the highway*' scoring should be amended from an **orange** score to a **green** score

7.24 Further, Peel's site at Croft should be recorded as making a weak contribution to the Green Belt and the selected allocation a strong Green Belt contribution. This should then be given due weight in the suitability assessment process.

7.25 Taking the above into account, Peel's proposal would achieve a better score in respect of three suitability criteria and a worse suitability score in respect of two criteria based on an objective appraisal as presented by Peel.

A long term development opportunity

- 7.26 It is also important that the post-plan period is considered in the selection of sites for allocation during the plan period. As evidenced above, there is a need for the release of land adjacent to Outlying Settlements to meet development needs beyond the plan period and thus to ensure the Green Belt can endure over the long term. The plan period and post-plan period allocations should be considered at the same time and as part of a single exercise to ensure the sustainable expansion of the settlement over the long term. A piecemeal approach should not be taken.
- 7.27 Peel's proposal provides the benefit of presenting a strategy for the long term growth of the settlement, through an initial plan period development and then a natural and logical second phase of development beyond the plan period utilising land to the north.
- 7.28 The proposed PUSLP allocation does not present an equivalent opportunity to build on the existing development in a sustainable manner. The further outward expansion of allocation OS1 would take in open Green Belt land and reinforce the development's physical disconnection and isolation from the main settlement area. In the context of a need to allocate land to deliver development needs beyond the plan period, the selected allocation does not present an opportunity for additional sustainable growth beyond 2038 in the manner of Peel's proposal therefore.

Site allocation OS1 – existing use

- 7.29 It is also important to highlight that the proposed allocation of site OS1 will displace an existing equestrian (Heathcroft Stud) use from the site. This is an existing business which moved to this premises in the 1990s following the sale of its previous site off Mustard Lane immediately to the west and its development for housing.
- 7.30 No evidence has been presented to indicate that the existing business is not viable and it is therefore likely that new premises will be sought after the business is displaced from its existing site. Given the nature of the use, the business is likely to seek a site within the Green Belt. An equestrian business would constitute inappropriate development in the Green Belt. Harm to the Green Belt will therefore result from any such development.
- 7.31 As such, whilst partly brownfield land, the overall net impact on the Green Belt of the site's development is likely to be the same as if the site were entirely greenfield given that a new site, most likely within the Green Belt, will need to be identified for the development of replacement premises for the existing business.

Taking these points together, it is clear that Peel's proposed development at Lady Lane presents a more sustainable and more suitable allocation to deliver both the plan period and post-plan period needs of the settlement compared to the selected site allocation OS2. Peel's site at Lady Lane should be allocated for the development of 100 dwellings during the plan period plus a further 100 dwellings beyond 2038 through a safeguarded land designation. This approach is consistent with the PUSLP's strategy of incremental growth within the Outlying Settlements.

Hollins Green

- 7.32 Peel's proposal for the allocation of land off Manchester Road, Hollins Green, is summarised in section 1. It comprises a plan period allocation of c.93 dwellings with the balance of the site safeguarded to meet development needs beyond the plan period (with a capacity of c.106 dwellings). This has been presented to enable a version of Peel's proposal consistent in scale with the allocation proposed in Hollins Green through the PUSLP to be considered against the selected site on a like-for-like basis. This then allows an assessment of whether, in the context of a continuation of a strategy incremental growth within the Outlying Settlements, the selected allocation in Hollins Green is the most sustainable compared to reasonable alternatives.

Council's appraisal of suitability, availability and viability of sites

- 7.33 Peel's assessment of the Council's appraisal of its proposed development site and that of the proposed site allocation to the south west of Hollins Green (Allocation OS4) as set out in the Site Proforma Assessment Report demonstrates that suitability scoring should be revised as follows:

- **Manchester Road:** the '*Air quality impacts*' scoring should be amended from an amber score to a yellow score
- **Manchester Road:** the '*loss of high quality agricultural land*' scoring should be amended from an amber score to a yellow score
- **Manchester Road:** the '*Capacity of the landscape to accommodate development*' scoring should be amended from an amber score to a yellow score

- 7.34 Further, the selected allocation site OS3 makes a strong Green Belt contribution. Peel agrees with the Council's conclusion that its site at Manchester Road makes a weak Green Belt contribution. This should then be given due weight in the suitability assessment process.
- 7.35 Taking the above into account, Peel's proposal would achieve a better score in respect of two suitability criteria and a worse suitability score in respect of one criteria based on an objective appraisal as presented by Peel.

Taking these points together, it is clear that Peel's proposed development at Manchester Road presents a more sustainable and more suitable allocation to deliver both the plan period and post-plan period needs of the settlement compared to the selected site allocation OS3. Peel's site at Manchester Road should be allocated for the development of c.93 dwellings during the plan parcel plus a further c106 dwellings beyond 2038 through a safeguarded land designation.

Lymm

- 7.36 Peel's proposal for the allocation of land off Rushgreen Road (east of Tanyard Farm) Lymm is summarised in section 1.

7.37 Peel's submitted Development Prospectus for this site comprises a plan period allocation of 115 dwellings and community health provision located within the northern part of the site and community sports, community sports facilities, informal open space and open tourism / leisure uses are proposed within the southern area. The number of dwellings proposed is consistent in scale with the allocations proposed in Lymm enabling it to be considered against the selected sites on a like-for-like basis. This then allows an assessment of whether, in the context of a continuation of a strategy incremental growth within the Outlying Settlements, the selected allocations in Lymm are the most sustainable compared to reasonable alternatives.

Council's appraisal of suitability, availability and viability of sites

7.38 Peel's assessment of the Council's appraisal of its proposed development site and that of the proposed site allocation at Pool Lane / Warrington Road (Allocation OS4) as set out in the Site Proforma Assessment Report demonstrates that suitability scoring should be revised as follows:

- **land off Rushgreen Road (east of Tanyard Farm):** The '*remediation of contaminated land*' scoring should be amended from an amber score to a yellow score. This would also result in the achievability score change to green.
- **land off Rushgreen Road (east of Tanyard Farm):** the '*agricultural land*' scoring should be amended from a red score to an amber score.
- **land off Rushgreen Road (east of Tanyard Farm):** the '*physical point of access into the highway*' scoring should be amended from an amber score to a green score

7.39 Taking the above into account, Peel's proposal would achieve a better score in respect of six suitability criteria and a worse suitability score in respect of three criteria based on an objective appraisal as presented by Peel.

7.40 In addition, the northern site within allocation OS4 is located entirely within Flood Zones 2 and 3. There are alternative sites available which are located outside of Flood Zones 2 and 3. The sequential test in NPPF is not met. **This should result in the site being discounted at the outset.** Approximately 50% of the southern site is located within Flood Zone 2. Insofar as there are alternative sites available which are located outside of Flood Zones 2 and 3, this should weigh against the allocation of this site.

7.41 Furthermore, professional judgement of the Green Belt contribution suggests that whilst an overall moderate contribution has been identified in relation to the southern site, the contribution made to individual purposes are such that an overall score of strong may have been justified. The overall scoring of moderate is marginal therefore and put be seen in this context.

7.42 Accessibility to Lymm centre is an important consideration in determining the sustainability of the location for development given the potential to promote non-car journeys and linked trips in Lymm particularly due to the size and strength of its Neighbourhood Centre. Parcel LY16 occupies a more favourable location in relation to the main concentration of services and facilities within Lymm Centre than proposed allocation OS4. At its mid-point it is approximately 1.2 km away from the centre of

Lymm if using surrounding roads to access the centre. Alternatively, the site would be around 1.1 km from the Centre if walking or cycling along the northern towpath of the Bridgewater Canal which provides the southern boundary to the site.

- 7.43 The site is significantly closer to Lymm Centre in this regard and a variety of attractive walking and cycling routes to the centre are available from the site, including off road options. As noted above, this accessibility is an important consideration in determining the sustainability of the location for development

Community Facility Benefits

- 7.44 Alongside residential development, Peel proposes to deliver community facilities, including sport facilities capable of use by the community, community health facilities, informal open space and tourism / leisure uses.
- 7.45 The open space could be used for different purposes but is capable of offering improved access to existing and future residents.
- 7.46 These additional elements offer the potential to be a significant asset for Lymm and a unique benefit of the proposal (one which other sites in Lymm, including the proposed allocations) are not capable of providing.

Taking these points together, it is clear that the release of land within Parcel LY16 represents the most sustainable approach to meeting the housing needs of Lymm. Within this context, land off Rushgreen Road (land east of Tanyard Farm) would be the least sensitive area for release within Parcel LY16 and should be prioritised over other areas within the same parcel. Peel's site should be allocated for the development of 115 dwellings together with the community health, community sports facilities, informal open space and open tourism / leisure uses. This approach is consistent with the PUSLP's strategy of incremental growth within the Outlying Settlements; it will also deliver a range of benefits that the other sites in Lymm considered for allocation cannot.

8. Employment land

- 8.1 The representation submitted jointly by Peel Land & Property Holdings (UK) and Peel Ports Group Limited considers the employment land requirement and supply over the plan period. It concludes that there needs to be more land allocated for employment purposes to ensure a sufficient, adequate and choice of supply is maintained throughout the Plan period. It raises significant concerns regarding reliance on two principal employment sites to meet the PSLP's strategic needs and the risk of under-delivery arising from this. This necessitates the release of additional land from the Green Belt to provide a flexible and reliable of sites to ensure the employment development needs of the Borough are met in a timely manner.
- 8.2 Section 6 of the joint representation also identifies the need for safeguarded land for employment purposes to satisfy paragraph 140 of the NPPF. The PSLP 2021 makes no provision for meeting employment lands beyond the plan period. This must be addressed if the plan is to proceed on a sound basis.

Land at Statham Meadows

- 8.3 In this context, Peel has historically promoted the development of a site at Statham Meadows for general employment uses. A site location plan is provided at Appendix 7.
- 8.4 This site extends to approximately 13 ha. It is located adjacent to Junction 21 of the M6 and has a frontage to the A57, which is a key route connecting Manchester and Warrington. This gives the site significant advantages in accommodating logistics or manufacturing uses and market demand would be high.
- 8.5 Critically given the site's infrastructure connections, vehicles serving the site would utilise this strategic road network and would not need to use local or residential roads. The site is capable of accommodating approximately 43,000 sq m of floor space, which would equate to two B2 / B8 units of approximately 200,000 sq ft each or four units of approximately 100,000 sq ft each.
- 8.6 This would represent a small incursion in to the Green Belt though the site is well contained by existing defensible features, including the River Mersey to the south and the A57 to the north ensuring the Green Belt in this area can endure over the long term.
- 8.7 This site also has the potential to be used for motorway services or roadside retail purposes, or part of a mix of uses alongside some employment development. The site's location on the M6 and A57 would lend itself to such uses; ensuring users of these busy stretches of strategic road have access to good quality welfare and break facilities as critical to the safe operation of the road network.
- 8.8 The principle of developing an MSA at Junction 21 of the M6 has previously been considered by the Secretary of State²¹, alongside proposals for an MSA at Junction 22

²¹ Secretary of State for Transport, Local Government and the Regions

of the M6. Planning applications for both schemes were ‘called in’, and the Secretary of State’s decision was issued in July 2002²².

8.9 Whilst both schemes were ultimately refused due to a lack of evidenced need at that time to outweigh the conflict with the development plan and ‘inappropriate’ development in the Green Belt, national policy relating to the provision and spacing of MSAs has changed significantly since that time. Current guidance²³ now confirms that:

- In order to provide opportunities to stop at intervals of approximately half an hour, the Highways Agency recommends that the maximum distance between MSAs should be no more than 28 miles.
- The distance between services can be shorter (particularly on congested parts of the network where travel between service areas may take longer), as long as the access / egress arrangements comply with technical standards in respect of junction separation.
- In determining applications for new sites, local planning authorities should not need to consider the merits of spacing of sites beyond conformity with the maximum and minimum spacing criteria established for safety reasons. Nor should they seek to prevent competition between operators; rather they should determine applications on their specific planning merits.
- It is for the private sector to promote and operate service areas that meet the needs of the travelling public.

8.10 Peel is aware of proposals by the Extra MSA Group for a new MSA at Junction 11 of the M62, to the north east of Warrington. It is noted that the planning application was refused in June 2021 and so any local gap in provision has not yet been met.

8.11 Notwithstanding that the previous proposals at Junction 21 and 22 were refused, the Inspector’s recommendation to the Secretary of State provides a number of helpful indications in relation to the Statham Meadows (Junction 21) opportunity. In particular, the Inspector concluded that:

“Should the Secretary of State... consider that a new MSA should be provided on the M6 motorway between Knutsford and Charnock Richard MSAs, I consider that notwithstanding the better access at Junction 22 and my preference for the Direct Option, the very slight net advantage of the Junction 21 site points to a MSA on that land.”²⁴

²² PINS ref. APP/M0655/V/00/000199 and 200

²³ Annex B: Roadside facilities for road users on motorways and all-purpose trunk roads in England, Circular 02/2013 (Department for Transport, September 2013)

²⁴ Paragraph 17.13, Inspector’s Report to the Secretary of State for Transport, Local Government and the Regions (19 April 2002)

- 8.12 The advantage referred to related to the potential for an MSA at Junction 21 to serve the needs of both long and short distance travel²⁵.

Highways and Access

- 8.13 The existing motorway junction adjacent to the site (M6 Junction 21) comprises 'dumb-bell' roundabouts located to the east and west of the mainline of the M6 motorway. Both roundabouts connect with the A57 Manchester Road with a two-lane dual carriageway connecting the two.
- 8.14 Access to the Statham Meadows site can be taken from an improved entry to the eastern roundabout with consequential amendments to the westbound A57 approach. Footway connections can also be provided. At the appropriate time, the access proposals will be subject to road safety audit but, at this stage, it is considered that safe and satisfactory access can be provided to the site.
- 8.15 As noted within Peel's representations to the PDO and PSLP 2019, the impacts of the traffic flows generated by employment and roadside services uses has been assessed at the two roundabouts at M6 Junction 21. Whilst both options increase queue lengths, it is concluded that the residual traffic impacts of the proposals are acceptable.
- 8.16 Traffic is also distributed in various directions from the junction and is therefore spread around the surrounding highway network. The impacts of this can be assessed in full as the proposals are progressed but, given the scale of total traffic generations and that the flows are spread across several roads, then off-site traffic impacts, away from M6 Junction 21, will not be severe.
- 8.17 In terms of sustainability, footways will be provided from the site to connect with existing facilities. The strategic cycle route 2 (Woolston to town centre) runs from Manchester Road west of M6 Junction 21 to the town centre via lightly trafficked streets and cycle paths. Bus route 100 runs along the site frontage, providing an hourly frequency service to Warrington Interchange, Hollins Green, Cadishead, Irlam, the Trafford Centre, Eccles, Salford and Manchester. The 3/3E bus route runs from Woolston Grange Avenue to Warrington Interchange with bus stops c. 500m from the site on Manchester Road. It provides a 30 minute frequency daytime service (20 minutes' weekday peak hours) with hourly evening services. The site is therefore accessible by sustainable travel modes.
- 8.18 Overall, it is therefore concluded in highways and transport terms, that the site can be accessed satisfactory and safely, residual traffic impacts will not be severe and the site will be sustainable and accessible.
- 8.19 The site is suitable and achievable for commercial development. It has been submitted to the Council as part of previous representations, including through 2016 Scope and Contents consultation and in response to call for sites consultations. Notwithstanding this, the site is not included in the Council's Site Assessment Proformas Report (2019) nor is it considered in the Council's 2021 update. The Council has therefore not taken

²⁵ Paragraph 17.9, Inspector's Report to the Secretary of State for Transport, Local Government and the Regions (19 April 2002)

account of this development opportunity, and appraised this alongside others as part of the Local Plan process.

- 8.20 It is requested that the site is assessed as part of an update to the Council's Site Assessment Report to enable it to be considered on a comparative basis and in the context of the increased employment land required identified in the joint submission made by Peel Land & Property Holdings (UK) and Peel Ports.

9. Summary and conclusions: correcting soundness

- 9.1 This representation submitted on behalf of Peel L&P Holdings (UK) Limited has highlighted some critical deficiencies with the PSLP 2021 and its evidence base. Collectively and individually, these render the PSLP unsound in its present form. Critical changes to the plan are needed to enable it to proceed on a sound basis.

Evidence base

- 9.2 Firstly and importantly the Local Plan evidence base is incomplete. The Council has not published a full schedule of housing sites which it considers to be developable over the plan period 2021 to 2038, with the latest such evidence being the 2020 SHLAA, which includes a number of sites which have been completed prior to the start of the plan period.
- 9.3 It has selected strategic sites for allocation at SEWUE, Warrington Waterfront and Thelwall Heys for residential development through reliance on a very limited evidence base. No ecology or landscape evidence has been provided in relation to these sites, whilst there is no evidence to demonstrate how and that sites can be satisfactorily accessed. This is a significant weakness in the evidence base. These sites have not proven to be deliverable over the plan period or that they represent the most sustainable options when considered against reasonable alternatives as a result.

The Council should provide full details of sites which comprise the claimed urban housing land supply of 11,785 dwellings over the plan period in order to satisfy the requirements of paragraph 68 of the NPPF and satisfy test of soundness (b) (Justified)

The Council should commission a full environmental and technical evidence base in relation to SEWUE, Thelwall Heys and Warrington Waterfront to enable their relative merits and sustainability to be assessed and compared on a fair and equal basis.

Quantitative housing need (Policy DEV 1)

- 9.4 The PSLP does not seek to meet the objectively assessed need for housing. There is a clear and fundamental misalignment of housing need and economic aspirations to the extent that insufficient housing will be delivered to provide a local labour force to deliver the employment strategy embedded within the Local Plan.

The PSLP should proceed on the basis of a requirement to plan for the provision of at least 1,050 dwellings per annum over the plan period in order to satisfy the requirements of paragraphs 11a, 23 and 60 of NPPF and satisfy tests of soundness (a) (Positively prepared) and (d) (Consistent with national policy)

Qualitative housing need (Relevant policies: Policies DEV2 and TC1)

- 9.5 The PSLP will not meet the qualitative housing needs of the Borough, including the need for family housing and affordable housing through over reliance on areas where development viability is compromised and through an over reliance on locations expected to provide apartments (principally the town centre)

The PSLP should seek to allocate land in more viable development areas where affordable housing can be provided as part of an overall housing mix and to create a more balanced mix of house types, relative to need, over the plan period in order to satisfy paragraphs 11a, 23 and 60 of the NPPF and satisfy test of soundness (c) (Effective)

Employment land need (Relevant policies: Policy DEV4)

- 9.6 The PSLP does not seek to meet the objectively assessed need for employment need over the plan period having regard to the economic prospects of the Borough and key drivers of growth, particularly in the logistics market.

The PSLP should proceed on the basis of a higher employment land requirement in order to satisfy paragraphs 11a and 23 of NPPF and satisfy tests of soundness (a) (Positively prepared) and (d) (Consistent with national policy)

Housing allocation requirements (Relevant policies: Policies DEV 1 and MD1)

- 9.7 The PSLP over-estimates the development yield from the urban area during the plan period resulting in a significant unmet housing requirement.

*The PSLP should identify **additional** land in the Green Belt which is capable of providing up to 7,696 dwellings over the plan period in order to satisfy paragraphs 11a, 23 and 60 of NPPF and satisfy tests of soundness (a) (Positively prepared), (c) (Effective) and (d) (Consistent with national policy)*

Safeguarding requirements (Relevant policies: Policy GB1, Policy DEV and Policy DEV34)

- 9.8 The PSLP does not make sufficient provision to meet development needs beyond the plan period and therefore in ensuring the Green Belt can endure.

*The PSLP should identify **additional** land in the Green Belt to be designated as 'safeguarded' to meet potential development needs beyond the plan period equivalent to that capable of delivering 4,249 dwellings, a proportion of which should be directed towards the Borough's Outlying Settlements in order to satisfy paragraph 140 of the NPPF. It should also release land from the Green Belt to be safeguarded to meet future employment needs*

The stepped housing requirement (Relevant policies: Policy DEV1)

- 9.9 The PSLP proposes a stepped housing requirement, with such requirements during the early years of the plan period being lower owing to the lead in time for the delivery of

the sites selected for allocation. The justification for this approach is insufficient and reflective of an erroneous process of options appraisal where the ability of sites (specifically the SWUE) to deliver early during the plan period has not been considered.

The PSLP assessment of site options should be reconsidered and appropriate weight given to those Green Belt options, including the South West Urban Extension, which are demonstrably capable of making a meaningful contribution to meeting development needs during the first five years of the plan period in order to satisfy paragraph 60 of the NPPF and therefore tests of soundness (a) (Positively prepared), (c) (Effective and (d) (Consistent with national policy)

The South West Urban Extension (Relevant policies: Policies DEV1, MD1 and MD5)

- 9.10 The South West Urban Extension represents a sustainable and deliverable residential development site which can meet the need for additional housing land during the plan period which this representation has demonstrated. It also represents the most sustainable of the candidate Green Belt releases being considered for housing development by reference to the prevailing evidence considered in this paper. Its omission from the PSLP is based on an inadequate and deficient assessment process which has over stated its harmful effects relative to other sites and which has not had proper regard to its benefits, including its ability to contribute to the delivery of the Western Link Road and deliver dwellings early in the plan period.

The PSLP should reinstate draft allocation MD3 from the PSLP 2019 in order to satisfy paragraphs 11a, 23 and 60 of NPPF and satisfy tests of soundness (a) (Positively prepared), (c) (Effective) and (d) (Consistent with national policy)

Alternatively, the points of unsoundness relating solely to safeguarded land (paragraph 9.7) can be partly corrected by allocating the SWUE as safeguarded land to meet development requirements beyond the plan period.

Alternatively, the points of unsoundness relation to solely the stepped requirement (paragraph 9.8 above) can be partly corrected by allocating a part of the SWUE for residential development during the plan period.

The Outlying Settlements (Relevant policies: Policies OS1, OS2, OS3 OS4, OS5)

- 9.11 The Council has adopted a deficient process in the selection of sites for allocation in the Outlying Settlements resulting in the allocation of sites which do not represent the most sustainable when considered in the round and against reasonable alternatives.

The PSLP should proceed on the basis that the following sites should be prioritised for allocation for residential development in the Outlying Settlements in order to satisfy test of soundness (b) (Justified):

- ***Land north of Culcheth – 300 dwellings during the plan period and 300 dwellings beyond the plan period (through a safeguarded land designation) alongside the provision of highway improvements to Warrington Road,***

potential expansion area for Culcheth Secondary School, the development of a country park and other open space

- *Land at Rushgreen Road, Lymm – Residential led mixed use development for 115 dwellings during the plan period including potential community, health, education, sports, recreation and tourism uses through a safeguarded land designation)*
- *Land at Manchester Road, Hollins Green – 200 dwellings during the plan period or 100 dwelling during the plan period and 100 dwellings beyond the plan period (through a safeguarded land designation)*
- *Land at Lady Lane, Croft – 200 dwellings during the plan period or 100 dwellings during the plan period and 100 dwellings beyond the plan period (through a safeguarded land designation)*

Statham Meadows (Relevant policies: Policy DEV 4)

- 9.12 There is a need for the PSLP to allocate additional land for employment development during the plan period in order to meet the objectively assessed need.

The PSLP should allocate land at Statham Meadows for allocation for employment / mixed commercial development during the plan period in order to satisfy paragraphs 11a and 23 of the NPPF and satisfy tests of soundness the Outlying Settlements in order to satisfy test of soundness (a) (Positively prepared), (c) (Effective) and (d) (Consistent with national policy).

Appendix 1: Local Plan transport evidence technical note



Technical Note

Project No: ITM13249
Project Title: Warrington Local Plan
Title: Representations by Peel L&P Holdings (UK) Limited and Peel Ports Group Regarding South West Urban Extension and Port Warrington in Relation to Impacts on Warrington Western Link
Ref: SEE/dc/ITM13249-005B TN
Date: 15 November 2021

SECTION 1 Introduction

- 1.1 This technical note has been prepared to support Peel L&P Holdings (UK) Limited (hereafter Peel L&P) and Peel Ports Group representations to the consultation on Warrington Council's Updated Proposed Submission Version Local Plan (2021 UPSVLP). Specifically this note addresses the claims made by Warrington Borough Council (WBC) that potential development sites at the South West Urban Extension (SWUE) and Port Warrington / Commercial Park (collectively PW) will adversely affect the capacity of the proposed Warrington Western Link (WWL) road.
- 1.2 By way of background, the following is noted:
- i The 2019 Proposed Submission Version Local Plan (2019 PSVLP) included both the SWUE and PW as draft allocations.
 - ii The 2021 UPSVLP excludes both potential development sites at the SWUE and PW.
 - iii The Council's report to its Cabinet meeting of 13 September 2021 confirms that SWUE and PW are removed as allocations. The Cabinet report notes in both cases that it has concerns in relation to the impacts of the developments on the WWL.
 - iv The Council's concerns appear to be based on traffic modelling conducted by Mott MacDonald and included in the evidence base supporting the 2021 UPSVLP.
- 1.3 This technical note therefore considers the technical analysis conducted by Mott MacDonald and demonstrates that the SWUE and PW will not adversely affect the WWL.
- 1.4 This note therefore sets out in:
- Section 2.0, a brief summary of Peel's development interests at SWUE and PW to provide context.

- Section 3.0, the Council's stated rationale for not allocating SWUE and PW (in relation to transport matters), contrasting this with the position in the 2019 PSVLP.
- Section 4.0, a rebuttal of the traffic modelling work that appears to have been used to support the Council's position.
- Section 5.0, consideration of funding of the WWL, particularly in terms of the Council's changed position.

SECTION 2 Peel's Land Interests

2.1 Comprehensive details of Peel's potential development sites at the SWUE and PW are set out in the main representations to the 2021 UPSVLP consultation prepared by Turley.

South West Urban Extension (SWUE)

2.2 The SWUE consortium comprises landowners Peel Investments (North) Limited (part of Peel L&P), Story Homes Limited, Ashall Property Limited and Riley Properties Limited. These representations have been prepared solely for Peel L&P. Peel L&P's holdings are concentrated in the north west of England but it also owns and manages significant assets throughout the UK. Peel L&P have a successful track-record in delivering growth and transformational projects including the Trafford Centre and Media City UK. Peel L&P owns and manages 12 million sqft of property and 20,000 acres of land and water.

2.3 Peel L&P has specific interests at the South West Urban Extension (SWUE) and owns c. 85 acres of land within the SWUE. Masterplanning identifies that the SWUE is capable of delivering around 1,800 new residential dwellings as well as supporting and complementary uses including a primary school and mixed-use local centre.

2.4 Policy MD3 of the 2019 PSVLP proposed the allocation of the South West Urban Extension (SWUE) noting this will deliver a new residential community of around 1,600 new homes as well as a primary school and mixed-use local centre. The PSVLP went on to note that the SWUE performed well against the objectives of the Local Plan, the requirements of the NPPF and the Local Plan's Sustainability Appraisal.

2.5 A transport appraisal of the SWUE was prepared by the consortium to support the draft allocation and this has been updated to support Peel's representations to the 2021 UPSVLP consultation. The key conclusions of this appraisal are:

- i 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 proposed 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.
- ii The site will meet the transport related objectives of the Council's 2021 UPSVLP; it will meet objective W4 of the Local Plan and, considering the five specific accessibility criteria defined by the Council, it will result in strong positive effects by meeting three of these and positive effects by meeting one.
- iii The development of the site will therefore fully accord with the NPPF objective related to sustainable travel, with many opportunities for such modes to be taken up.
- iv Access to the site can be provided off Chester Road and Runcorn Road and feasibility level designs of the principal accesses have been produced and the capacity of these considered. The access arrangements will operate satisfactorily. Access to the site is deliverable and achievable. It is therefore also concluded that satisfactory access can be provided in accordance with the NPPF.
- v The proposed Western Link will provide significant additional capacity in the central Warrington Road network and will assist in facilitating the SWUE. WBC's 2019 PSVLP evidence base included traffic modelling to demonstrate that the traffic flows generated by the 2019 PSVLP development, including the dwellings on the SWUE, could be accommodated on the surrounding highway network.
- vi There is the potential for the SWUE to deliver housing before the opening of the WWL.
- vii 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.

2.6 Overall the 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 Council's 'Development Options and Site Assessment Technical Report – September 2021' notes ***"...the Council considers that this remains a reasonable option, providing a residential led sustainable urban extension supported by a local centre and new primary school"***.

Port Warrington / Commercial Park (PW)

- 2.7 Peel Ports Group and Peel L&P also has specific interests as landowner in Warrington Waterfront at Port Warrington, Warrington Commercial Park and Arpley Meadows Country Park with these identified as draft allocations in the 2019 PSVLP via Policy MD1. Masterplanning identifies that these areas are capable of delivering c.3.1m sqft of employment, largely port related, development as well as a new country park.
- 2.8 A transport appraisal of PW was prepared to support the draft allocation in the 2019 PSVLP and this has also been updated to support Peel's representations to the consultation into the 2021 UPSVLP. The key conclusions of this appraisal are:
- i The Warrington Waterfront area as a whole could include a mix of uses enabling travel to be made locally between homes and workplaces and to a range of local facilities and services by active travel modes. The inclusion of PW as a draft allocation will therefore support and promote sustainable travel patterns and development.
 - ii The Waterfront and Peel's land interests within it can meet the transport related objectives of the Council's 2021 UPSVLP. Furthermore, it will meet objective W4 of the Local Plan. The development of the PW site will therefore fully accord with the NPPF objective related to sustainable travel, with many opportunities for such modes to be taken up.
 - iii A new strategic high quality and high capacity highway access to the Waterfront sites will be provided by the provision of the Warrington Western Link. The rationale for this scheme is partly to open-up development areas at the Waterfront (with access to PW being a stated objective of the scheme in the funding bid submitted to DfT) and the scheme can be designed to accommodate the traffic movements generated by the area.
 - iv There are opportunities to access some development at the Warrington Commercial Park and potentially the expansion of Port Warrington from the existing road network to the north of the development area. The Forrest Way bridge across the Mersey provides a connection into the area.
 - v It is therefore also concluded that satisfactory access can be provided in accordance with the NPPF.

- vi The Warrington Western Link will also provide significant additional capacity in the central Warrington road network and will assist in facilitating the full Warrington Waterfront development proposals by accommodating the traffic generated by it. WBC'S 2019 PSVLP evidence base included traffic modelling to demonstrate that the traffic flows generated by the 2019 PSVLP development, including PW, can be accommodated on the surrounding highway network.
- vii Traffic assessments of initial development at the Warrington Commercial Park and/or Port Warrington demonstrate that there is some potential to serve initial phases of development from the existing road network without resulting in severe traffic impacts. This could allow development at the Waterfront to progress once the WWL is confirmed but before it is opened to traffic.
- viii The residual cumulative traffic impacts of development at the Waterfront and on Peel's sites will not be severe and therefore, in accordance with NPPF, development should not be prevented on transport grounds.

2.9 Overall the assessment confirms that Peel's land interests at Warrington Waterfront (at Port Warrington, Warrington Commercial Park and Arpley Meadows Country Park) are suitable for allocation in the Council's 2021 Local Plan and will form a sustainable development that can provide a multi modal port facility within Warrington.

SECTION 3 WBC's Position

Introduction

3.1 We consider the 2019 PSVLP and its supporting evidence base, particularly in relation to the Council's current position, and the now proposed 2021 UPSVLP which is subject to consultation.

2019 PSVLP

3.2 The 2019 PSVLP was issued for consultation in March 2019. As noted above, SWUE and PW were included as draft allocations MD3 and MD1 respectively (the latter as part of Warrington Waterfront).

3.3 The Council's report to their Executive Board of 11 March 2019, seeking approval of the 2019 PSVLP prior to consultation, describes the process for developing the Local Plan and identifying draft allocations. This notes, at is paragraph 5.1, that the Council carried out a fundamental review of the technical evidence base and options assessments that underpin the (then) emerging local plan.

3.4 Paragraph 5.5 of the report notes that the (2019) PSVLP was prepared at the same time as the new Local Transport Plan **“to ensure the transport implications are properly assessed and that the development proposed in the PSVLP supports the Council’s aim of promoting sustainable transport modes”**. It goes on to note **“This work has included testing the transport implications of the emerging Local Plan through the Council’s Multi-Modal Transport Model”**.

3.5 Paragraph 5.6 confirms that detailed work was undertaken to demonstrate that the Plan can be delivered including assessing the deliverability of infrastructure required to support Warrington’s growth.

3.6 Thus in 2019 the Council confirmed:

- SWUE and PW were suitable as draft allocations (and were thus included in the 2019 PSVLP).
- That they had undertaken a fundamental review of the technical evidence base.
- That the transport implications (of the Local Plan) had been properly assessed, including by using the Council’s Multi-Modal Transport Model.
- That sufficient detailed work had been undertaken to demonstrate that the Plan (which included SWUE and PW as well as the Warrington Western Link) can be delivered, including assessing the infrastructure required to support growth.

3.7 The Council did not raise concerns regarding the impacts of SWUE and/or PW on the WWL.

3.8 Indeed, paragraph 3.3.28 of the 2019 PSVLP states:

“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”.

2019 Warrington Local Plan Testing

3.9 As noted above, the evidence base included testing the emerging development strategy with the Warrington Multi-Modal Transport Model. This is reported in the above document provided by Aecom. This notes:

“As the PSVLP is expected to impose significant pressure on the transport network, it will be particularly important that soundly based evidence justifies the associated transport strategy, for the final consultation of the preferred spatial strategy prior to an Examination in Public (EiP).”

“The PSVLP sets out the Council’s favoured approach to delivering the housing and employment land necessary to meet its growth targets.”

“The WMMTM16 has been used to forecast the impact of this pattern of development growth on the transport network in Warrington.”

“The purpose of the testing is to ensure that the transport impacts of the development and associated highway interventions are deliverable, attractive to encourage mode change, whilst addressing existing known congestion issues. The model has been used to identify and assess the transport impacts of the PSVLP growth in Warrington.”

3.10 Section 3 of the report outlines the levels of growth assessed (i.e. the PSVLP growth) with section 4 setting out the three transport infrastructure scenarios tested which includes the WWL in scenarios 2 and 3 (with all scenarios also including the 2019 PSVLP development). Section 6 of the report summarises the results of the modelling. Figures 20 and 25 (included in Appendix A of this report) show the delays at junctions in the AM and PM peak hours respectively at 2036 for scenario 2. It is noted that there are no significant delays along the WWL including at the terminal junctions with A56 and A57 i.e. no significant delays are identified with the 2019 PSVLP growth including SWUE and PW. Furthermore, the commentary on the figures suggests that further mitigation would need to be identified – not uncommon at Local Plan Stage with the full details of mitigation developed through comprehensive technical assessment work that would be undertaken as planning applications are progressed. The Council therefore accepted the principle that further mitigation would need to be identified and this should remain the position with the emerging Local Plan.

2021 UPSVLP

3.11 The Council has changed its position. The Council now considers that both the SWUE and PW would have adverse impacts on the WWL.

3.12 The Council note, in their report to Cabinet of 13 September 2021, that they have updated their evidence base and re-assessed the plan’s spatial strategy and potential allocations sites. Paragraph 3.12 of the report notes that the SWUE and PW are removed as allocations.

3.13 Specifically, paragraph 6.20 notes ***“The Council also has concerns about the potential impact of the South West Urban Extension on the Western Link”*** and paragraph 6.28 states ***“Port Warrington...having undertaken additional transport modelling work, the Council has significant concerns regarding the potential impact on the Western Link”*** and ***“Warrington Commercial Park...the Council has similar concerns around the potential impacts on the Western Link.”***

- 3.14 From reviewing the evidence base issued with the 2021 UPSVLP, it appears that the Mott MacDonald technical note titled 'Full Build Out Scenario' (reference 411029-MMD-17-XX-XX-C-0004-P03 dated 1 September 2021) is the only published evidence available that assesses impacts of the SWUE and PW on the Western Link. The Council has been requested to confirm this position but, thus far, has not done so.
- 3.15 The Council's extensive modelling for the 2019 PSVLP, which included development at the SWUE and PW, concluded that the (then) Plan could be delivered. The modelling and 2019 PSVLP included the WWL. Lower levels of growth are proposed in the 2021 UPSVLP and therefore conclusions should remain that a Plan including SWUE, PW and the WWL is deliverable. Instead, evidence has been prepared (and dated 1 September, a matter of days before the Council's report to Cabinet on the 2021 USPVLP was released) which specifically attempts to show SWUE and PW will have adverse impacts on the WWL. This is now considered in detail.

SECTION 4 Rebuttal of Additional Traffic Modelling

Introduction

- 4.1 As noted above, the Council's conclusions in relation to the impacts of the SWUE and PW on the WWL appear to be based on the Mott MacDonald (MM) technical note referenced above. This attempts to show that the cumulative impacts of SWUE and PW would have adverse impacts on WWL. There is no other publicly available evidence.
- 4.2 The MM technical note provides some technical detail but the Council has been requested to provide missing information such that the evidence can be properly reviewed. The correspondence is included in Appendix B of this report. The Council has not yet provided the missing information and therefore it may be necessary, once it is received and reviewed in detail, for Peel to make additional submissions.
- 4.3 At this stage, the rebuttal below is based on the information provided in the note and considers the following:
- Development Scenarios Assessed
 - Port Warrington / Commercial Park Trip Generation
 - Transport Model Convergence
 - Impacts on A56/WWL Terminal Junction
 - Impacts on A57/WWL Terminal Junction

- Increase in town centre cordon traffic flows.

Development Scenarios Assessed

4.4 MM note that the purpose of their technical note is to demonstrate the capacity differences on the WWL between different development scenarios:

- 1 DD022036: the development included in the uncertainty log, with the WWL fully complete in 2036, with Arpley Meadows site parcel K5; and
- 2 FBO2036: the development included in the uncertainty log, with the WWL fully complete in 2036, with the additional developments noted in Table 1 of the note (which include the SWUE and PW).

4.5 It is not clear which specific developments / growth assumptions are included in the modelling. This has been requested from, but not provided by, the Council. MM note that the first scenario includes developments included in the uncertainty log and Section 2.1 of the note refers to the business case uncertainty log review 2020. This information does not appear to be publicly available and is not part of the evidence base. The scenario, in the absence of confirmation of its details, has been taken at face value as a suitable base upon which to assess the impacts of SWUE and PW until such details are provided by the Council.

4.6 The second scenario includes six additional development sites of which it appears site ID3 is the SWUE and ID4-6 are PW (including the Commercial Park). ID1 and 2 are WBC sites K5 and K7 comprising a total of 1,537 residential dwellings. It appears these may be sites at Warrington Waterfront but this remains to be confirmed.

4.7 Given the information provided (and in the absence of information requested), it is not possible to assess the impacts of individual development sites including the SWUE and PW and only the cumulative (i.e. all sites together) can be considered and even then against an unspecified base. Further submissions may be made when the Council provides the data that has been requested.

Port Warrington Trip Generation

4.8 Table 1 of the MM technical note provides the two-way trip generation assumed for PW by the Council, in terms of additional two-way trips (in passenger car units per hour - pcus/hr), with the trips associated with PW reproduced in the table below:

Table 4.1 Port Warrington / Commercial Hub Trip Generation – MM/WBC

Site ID	Site	AM Peak Hour				PM Peak Hour			
		Car	LGV	HGV	Total	Car	LGV	HGV	Total
4	Port Warrington (B2/B8)	976	144	28	1,149	760	300	20	1,080
5	Warrington Commercial Park (B1a/b)	44	0	0	44	35	0	0	35
6	Warrington Commercial Park (B1c/B2/B8)	365	50	11	426	284	103	6	393
Total		1,385	194	39	1,619	1,079	403	26	1,508

4.9 Thus the transport modelling by MM assumes 1,508-1,619 peak hour trips associated with PW (including the Commercial Park).

4.10 Peel’s representations to the Council in relation to the Local Plan (including the 2019 PSVLP) have included trip generation estimates for PW. These take account of the existing usage of the port, the traffic flows that could be generated by its approved extension and the traffic flows generated by 3.1m sqft of additional development at the Port / Commercial Park. Traffic flows were calculated and provided for two scenarios: first, all of the site (3.1m sqft) developed for Port related logistics uses; and, secondly, the Port area (2.2m sqft) developed for port related logistics and the Commercial Park developed for 0.9m sqft of B1/B2 uses. The traffic forecasts have been updated to account for the latest HGV forecasts produced by MDS. The second scenario results in the highest peak hour traffic flows and these are (two-way in pcus):

Table 4.2 Port Warrington / Commercial Park Trip Generation – Peel

Site	AM Peak Hour			PM Peak Hour		
	Cars / LGVs	HGV	Total	Cars / LGVs	HGV	Total
Existing Port Warrington	9	16	25	1	5	6
Consented Port Warrington Extension	21	25	46	23	21	44
3.1m sqft Port Warrington / Commercial Park	653	221	874	525	175	700
Total	683	262	945	549	201	750

4.11 Thus Peel’s traffic generation predictions are significantly lower than those adopted by MM/WBC in their traffic modelling – 42% lower and 50% lower in the AM and PM peak hours respectively.

4.12 The inclusion of significantly higher trip rates for PW will result in greater/worse predicted impacts at the A56/WWL and A57/WWL terminal junctions than would otherwise be the case. The inclusion of the much-higher trip generations at PW will also potentially affect the basis of the multi-modal transport modelling and the traffic assignments (flows) that are used to assess the capacity of junctions.

Model Convergence

4.13 MM note that the modelling undertaken for the FBO2036 scenario (i.e. the forecast scenario that includes SWUE and PW) demonstrates some poor convergence. However, MM do state that the model did converge and the modelled output traffic forecasts/flows have been used by MM. It is concluded there is no significant issue to address.

Impact on A56/WWL Terminal Junction

4.14 MM has presented the results of their LINSIG modelling of the A56/WWL terminal junction for both traffic flow scenarios and Figure 1 in the MM technical note shows a sketch of the junction. The LINSIG results are shown in the note's Table 3 for the DD022036DS scenario and Table 4 for the FBO2036DS scenario. The results are reproduced below, side-by-side, for comparison purposes:

Table 4.3 A56/WWL Junction: DD022036DS and FBO2036DS Modelling Results

Approach (Inbound)	AM Peak Hour				PM Peak Hour			
	DD022036DS		FBO2036DS		DD022036DS		FBO2036DS	
	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)
WWLR (in)	88.2%	12.6	89.8%	13.7	89.1%	12.5	91.0%	13.2
Chester Road East	89.1%	10.9	92.8%	18	87.2%	10.1	87.1%	13.8
Chester Road South (left lane)	79.1%	10.1	115.9%	88.2	88.7%	14.0	86.9%	14.1
Chester Road South (right lane)	87.4%	12.8	65.4%	7.2	88.2%	13.8	72.3%	9.2
Circulatory at WWLR (ahead)	49.9%	5.0	52.1%	4.1	46.7%	5.7	89.1%	5.2
Circulatory at Chester Road east (left lane)	80.0%	3.3	42.4%	1.4	79.6%	2.9	89.3%	5.2
Circulatory at Chester Road east (right lane)	80.3%	3.3	42.4%	1.4	80.0%	2.9	54.0%	1.9
Circulatory at Chester Road south (right lane)	58.6%	2.3	89.4%	4.5	81.0%	3.9	77.0%	2.8
WWLR (out)	62.5%	9.9	86.0%	24.8	77.0%	16.7	74.9%	15.5

4.15 The MM results identify that the Chester Road nearside lane approach to the junction is over-capacity in the AM peak hour with the FBO2036DS traffic flows. The degree of saturation is 115.9% and the queue is 88 pcus.

4.16 This approach to the junction has been designed with a single lane. It is noted that the scheme included in the Council’s Outline Business Case (OBC) submitted to DfT included a two-lane approach. Such an arrangement, combined with two lanes on the WWL exit (with a merge to one lane as per the OBC scheme) will provide additional capacity.

4.17 With the information provided in the MM technical note, it has been possible to build a LINSIG model of the junction which gives results similar to but not exactly the same as MM (noting the LINSIG model has been requested). An additional second lane on the Chester Road movement to WWL has then been added to the model and its impacts assessed. The results are presented in the table below, comparing these with MM’s DD02036DS results.

Table 4.4 A56/WWL Junction: Comparison of MM DD02036DS with Improved Layout for FBO2036DS

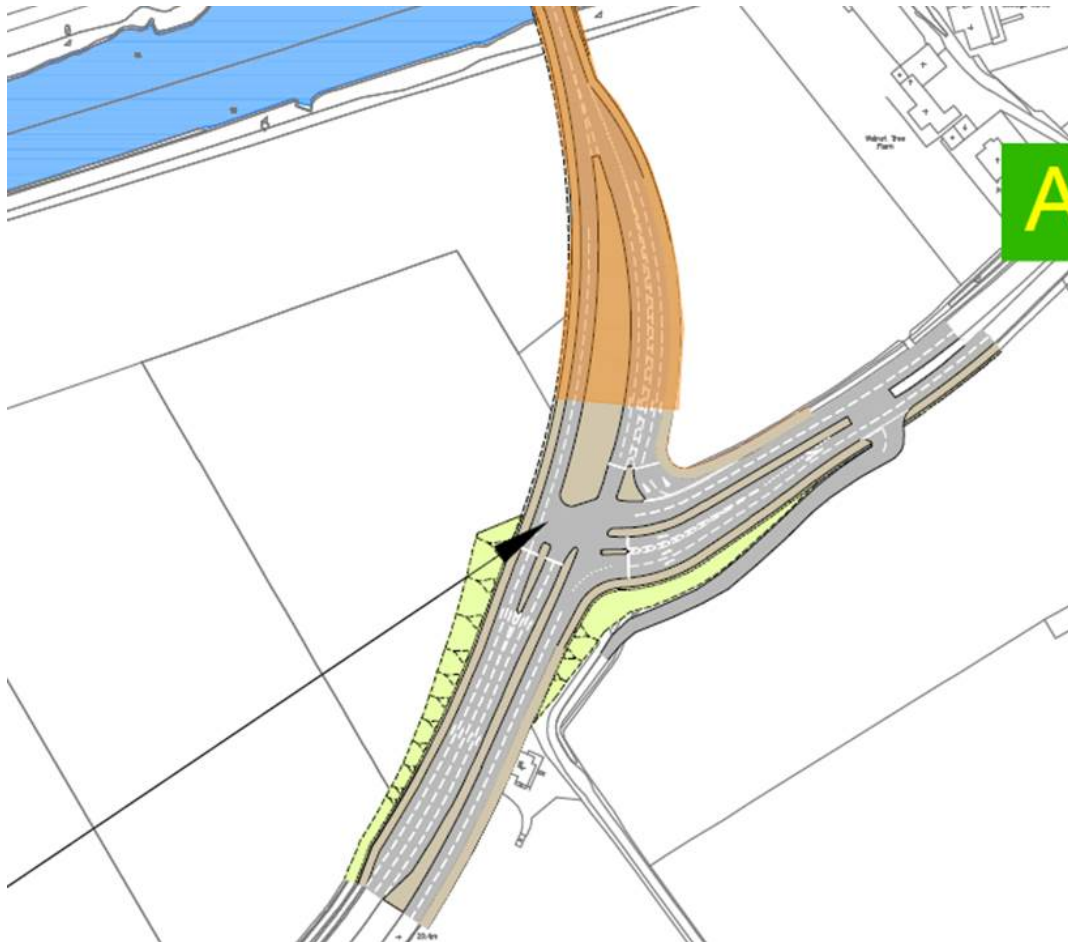
Approach (Inbound)	AM Peak Hour				PM Peak Hour			
	MM DD022036DS		Improved Layout FBO2036DS		MM DD022036DS		Improved Layout FBO2036DS	
	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)
WWLR (in)	88.2%	12.6	87.0%	11	89.1%	12.5	91.0%	15
Chester Road East	89.1%	10.9	92.8%	16	87.2%	10.1	82.3%	12
Chester Road South (left lane)	79.1%	10.1	80.2%*	11*	88.7%	14.0	54.3%*	6*
Chester Road South (right lane)	87.4%	12.8	67.1%	8	88.2%	13.8	72.3%	9
Circulatory at WWLR (ahead)	49.9%	5.0	65.1%	5	46.7%	5.7	57.8%	5
Circulatory at Chester Road east (left lane)	80.0%	3.3	50.9%	4	79.6%	2.9	56.7%	4
Circulatory at Chester Road east (right lane)	80.3%	3.3	50.9%	4	80.0%	2.9	56.7%	4
Circulatory at Chester Road south (right lane)	58.6%	2.3	81.6%	6	81.0%	3.9	72.9%	7
WWLR (out)	62.5%	9.9	72.1%*	6*	77.0%	16.7	58.0%*	3*

*two lanes provided on Chester Road South Left Lane and associated exit onto WWL

4.18 The modelling results demonstrate that such an improvement to the junction, consistent with the approach included in the Council’s OBC, would provide additional capacity resulting in a significant reduction in the degree of saturation and queue on the Chester Road nearside lane approach to the junction. Notwithstanding the issues raised in relation to traffic flows, this shows that modest improvements could be introduced at the junction to accommodate the cumulative impacts of the developments included in MM’s FBO2036DS scenario.

4.19 As we have noted, the OBC submitted to the DfT for the Council’s WWL funding bid included the Recommended Revised Red Route scheme. This included a three-arm traffic signal controlled junction at the A56/WWL terminal as shown in Figure 4.1 below (extracted from the WBC plans).

Figure 4.1 A56/WWL Terminal Junction – WBC Revised Red Route



4.20 This layout has been modelled with LINSIG for the FBO2036DS Scenario and the results are presented below.

Table 4.5 A56/WWL Signalised T-junction Arrangement with FBO2036DS Traffic Flows

Arm / Lane	AM Peak Hour		PM Peak Hour	
	DoS (%)	MMQ	DoS (%)	MMQ
WWLR (In) – Left Lane	56.8%	1	48.8%	1
WWLR (In) – Left Lane Give Way	88.2%	9	79.4%	6
WWLR (In) – Ahead	71.5%	8	74.5%	11
Chester Road East – Left Lane	73.2%	15	78.2%	18
Chester Road East – Left & Right Lane	79.8%	15	78.5%	12
Chester Road South – Ahead	62.4%	11	42.3%	7
Chester Road South – Right Lane	87.1%	10	78.1%	10

4.21 The analysis identifies that the junction would operate within capacity with the FBO2036DS traffic flows.

4.22 Thus there are options to improve the A56 WWL junction which would be deliverable and viable. It is therefore concluded that, contrary to the Council’s position, the developments at SWUE and PW will not significantly impact on the WWL at this location.

Impact on A57/WWL Junction

4.23 A sketch of this junction is shown in Figure 6 of the MM technical note with the summary results of LINSIG analysis presented in the note’s Tables 5 and 6 for the DD02036DS and FBO2036DS scenarios respectively. The results are reproduced in the table below.

Table 4.6 A57/WWL Junction: Comparison of MM DD022036DS and FBO2036DS Modelling Results

Approach (Inbound)	AM Peak Hour				PM Peak Hour			
	DD022036DS		FBO2036DS		DD022036DS		FBO2036DS	
	DoS (%)	Queue (PCU)	DoS (%)	Queue (PCU)	DoS (%)	Queue (PCU)	DoS (%)	Queue (PCU)
A574 Cromwell Avenue (left turn)	74.2%	16.0	65.3%	13.3	29.1%	4.8	31.2%	5.4
A574 Cromwell Avenue (ahead turn)	69.1%	7.6	92.5%	13.8	86.3%	13.1	82.3%	11.8
A574 Cromwell Avenue (right & ahead turn)	78.8%	9.3	94.8%	15.5	90.7%	15.0	82.3%	13.6
A57 Sankey Way East (left & ahead turn)	88.0%	17.9	95.7%	22.9	88.9%	18.7	89.8%	20.0
A57 Sankey Way East (ahead turn)	89.3%	20.2	96.4%	26.6	89.0%	20.6	90.4%	22.5
A57 Sankey Way East (right turn)	45.9%	6.5	50.0%	7.2	91.4%	18.7	84.0%	15.5
WWLR (left turn)	61.3%	9.6	56.5%	8.6	82.0%	15.3	92.8%	28.7
WWLR (ahead turn)	58.9%	6.1	50.3%	5.6	49.3%	4.3	71.4%	5.8

Approach (Inbound)	AM Peak Hour				PM Peak Hour			
	DD022036DS		FBO2036DS		DD022036DS		FBO2036DS	
	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)	Dos (%)	Queue (PCU)
WWLR (right turn)	88.8%	8.5	95.4%	10.2	45.5%	3.5	99.1%	9.1
A57 Sankey Way West (left & ahead turns)	86.6%	18.8	92.8%	20.8	88.8%	19.1	88.0%	20.8
A57 Sankey Way West (ahead turn)	86.8%	20.3	92.7%	22.2	89.2%	20.7	88.7%	22.6
A57 Sankey Way West (right turn)	70.0%	13.0	96.9%	25.2	68.6%	11.4	57.3%	9.9

4.24 It has not been possible to recreate the LINSIG model for this junction given the lack of detail available in the MM technical note (the detail has been requested but not provided). Information is not presented in the MM note to confirm MM's conclusions regarding queues failing to clear adequately. However, based on the information available, we note:

- The additional traffic has a modest impact. None of the degrees of saturation presented by MM exceed 100% and this is at 2036, fifteen years hence. It is concluded that the impacts shown are not severe within the meaning of the NPPF. These should not stifle development.
- The traffic flows used for PW are unjustifiably high (as set out above) and reducing these would reduce impacts at the junction.
- The Council accepted the principle in relation to the 2019 PSVLP that potential further mitigation would need to be identified at several junctions. Given the stage in the planning process, the modest impacts identified should not be used to justify the exclusion of sites from the Local Plan, noting also that the assessment is cumulative and considers several sites.
- There has been no attempt to assess any, even modest, improvements to the junction. Without the LINSIG model and supporting information requested it is not possible to assess these with the information available, but they could include: modelling the introduction of MOVA control; widening of lanes; extended flare lengths etc.

4.25 Given the modest cumulative impact presented by MM, which is not severe, the high traffic flows used and the potential to introduce improvements at the junction, it is concluded that the SWUE and PW developments will not have significant, or severe within the context of the NPPF, impacts on the operation of the A57/WWL junction.

Town Centre Cordon

4.26 MM present, in their Table 7, the change in overall traffic volumes through the town centre cordon, comparing the DD02036DS and FBO2036DS scenarios. MM note there is an increase in vehicles passing through the town centre cordon and state that the delivery of the additional development within the FBO2036DS scenario causes some traffic to re-route through the town centre.

4.27 Further information on the traffic flows has been requested from WBC but not provided. From the data available we note:

- Total town centre cordon traffic flows increase by only 3.1%
- An increase is not surprising given the FBO2036DS scenario includes significant additional development and therefore additional trips.
- Some of the trips generated by the additional developments would be expected to start or end in and/or around the town centre and would therefore cross the cordon.

4.28 Of the ten road links where data is presented, MM's modelling predicts that six see increases in traffic whilst four experience decreases. The maximum percentage increases in daily traffic are c.9%. These are likely to be within daily variations in traffic flows. The Guidelines for the Environmental Assessment of Road Traffic note:

"Traffic forecasting is not an exact science and the accuracy of projections is open to debate. It is generally accepted that accuracies greater than 10% are not achievable. It should also be noted that the day-to-day variation of traffic on a road is frequently at least some + or – 10%. At a basic level, it should therefore be assumed that projected changes in traffic of less than 10% create no discernible environmental impact."

4.29 Thus, based on the small increase in traffic across the cordon of only c.3%, that the FBO2036DS scenario includes increased levels of development / traffic, that some of this traffic would be expected to cross the town centre cordon in any event and that increases in traffic on individual links will be within expected daily variations, it is concluded that MM's concerns are unfounded and not significant. They do not indicate a severe impact within the meaning of the NPPF.

Conclusions

4.30 The following is concluded regarding the MM technical note and the resulting conclusions on it drawn by the Council:

- No clarity is provided on the development scenarios tested and the details of sites within them and this must be provided by the Council.

- The trip generation forecasts adopted for PW are too high and these result in greater impacts on the WWL terminal junctions than would otherwise be the case.
- There is no significant issue to address in terms of model convergence as MM confirm the model did converge.
- There are options to improve the A56/WWL junction which would be deliverable and viable. It is therefore concluded that, contrary to the Council's position, the developments at SWUE and PW will not significantly impact on the WWL at this location.
- The additional traffic flows at the A57/WWL terminal junction have a modest impact and these are not severe within the meaning of the NPPF. There has been no attempt to assess improvements which, given the modest impacts, would likely be small-scale.
- Based on the small increase in traffic across the town centre cordon of only c.3%, that the FBO2036DS scenario includes increased levels of development / traffic, that some of this traffic would be expected to cross the town centre cordon in any event and that increases in traffic flows on individual links will be within expected daily variations, it is concluded that MM's concerns are unfounded and not significant. They do not indicate a severe impact within the meaning of the NPPF.

4.31 MM identify delivery considerations which would need to be considered if the schemes in the FBO2036DS scenario (i.e. including the SWUE and PW) were to be brought forward. This would be the case for all major sites identified in the 2021 UPSVLP and would be undertaken in detail post allocation/Local Plan adoption.

4.32 Thus the Council's conclusions that both the SWUE and PW would have adverse impact on WWL are not justified by detailed evidence and, as demonstrated above, are unfounded. As has been previously confirmed by the Council via the 2019 PSVLP, the SWUE and PW are both achievable and deliverable.

SECTION 5 Funding of the WWL

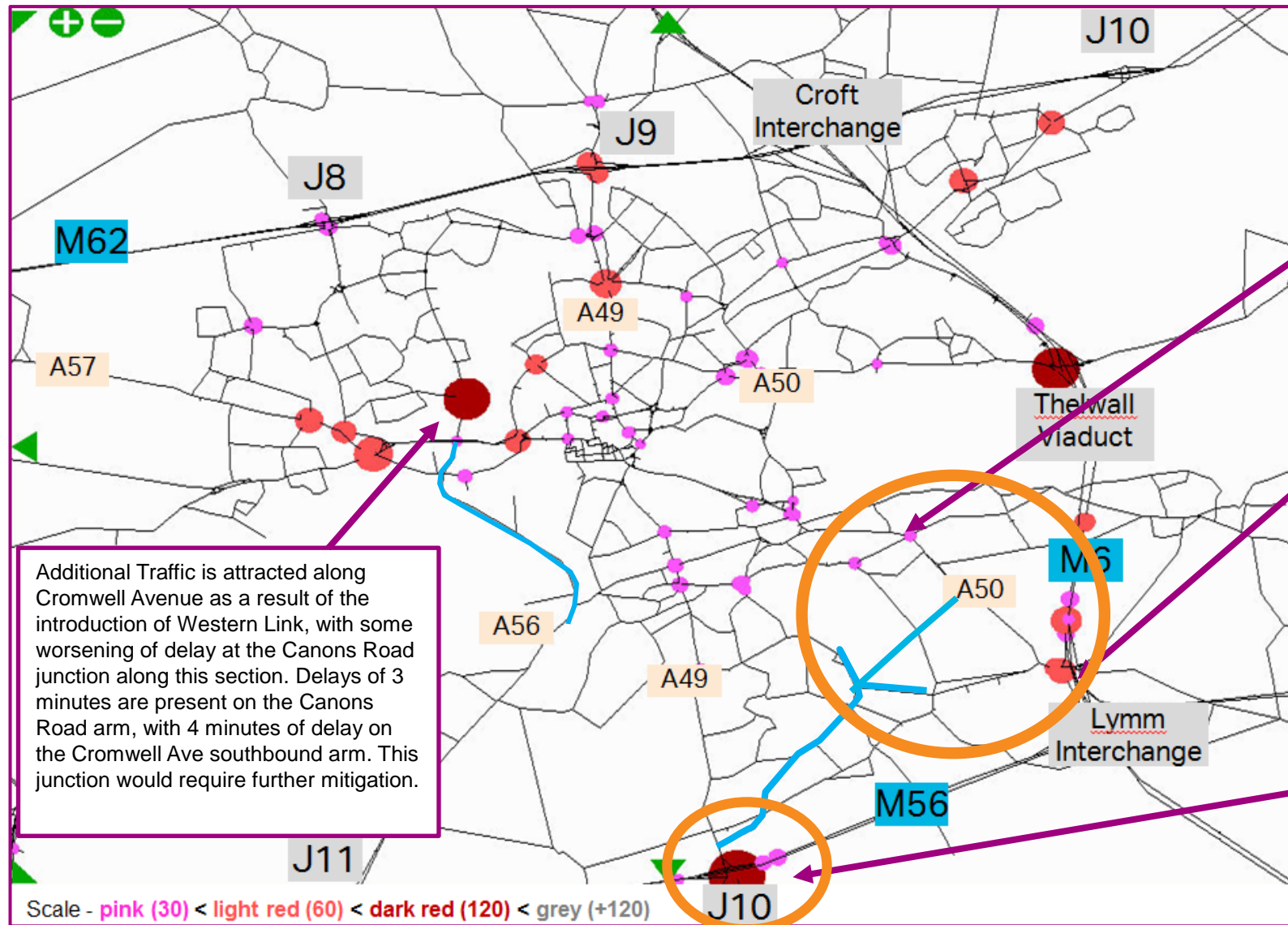
5.1 WBC's website related to the WWL notes that the total estimated build cost is £212 million and that, in 2019, the DfT informed the Council that the scheme had been conditionally awarded £142.5 million. WBC's Cabinet agreed to accept the DfT offer in July 2019. This leaves a funding gap of £69.5 million.

5.2 The Infrastructure Delivery Plan (2021) submitted as part of the 2021 UPSVLP evidence base notes the cost of the Western Link (plus complementary junctions) is £220 million, with confirmed funding of £142.5 million and a funding gap of £77.5 million. The IDP notes the funding source as DfT and WBC.

- 5.3 The Outline Business Case for the WWL, submitted to DfT, considered the funding of the scheme including the funding gap. The OBC notes that WBC can use prudential borrowing to part-fund the scheme. The Financial Case of the OBC notes that there are wider accounting implications of WBC borrowing c.£70 million, identifying interest on borrowing of c.£43 million. The financial case goes on to note how these costs will be repaid: New Homes Bonus and CiL of £9.5m; National non-domestic rates of £86.4 million; and receipts from land sales of £21.2 million (noting the total exceeds capital borrowing and interest). This appears to secure the 'local contribution' to the scheme.
- 5.4 However, the Council has noted, with reference to the Council borrowing of (then) £70.24m, at the Cabinet meeting on the 8th July 2019 and as recorded in the Cabinet Key Decision:
- "Cllr H Mundry referred to section 10.2 of the report and stated that the council was to underwrite a local contribution of some £70.24m towards the estimated cost of the scheme of £212.7m. It was important to note that the council would be looking to secure as much of this contribution as possible from developments which were enabled by the scheme. These developments include those contained within the Draft Local Plan, which had recently been consulted upon, and included Warrington Waterfront and the South West Urban Extension which were proposed for a mixture of housing and employment uses."***
- 5.5 The 2019 PSVLP draft policies for Warrington Waterfront (MD1), including Port Warrington/ Commercial Park (and also including the residential uses at Warrington Waterfront), and MD3 for the SWUE noted that the development would be expected to make a proportionate contribution towards the delivery of the Western Link Road i.e. the WWL. It is understood that these were the only site specific policies in the 2019 PSVLP that required such a contribution.
- 5.6 It appears that the 2021 UPSVLP only requires contributions to the WWL from the residential development at Warrington Waterfront included in Policy MD1. Thus the Council has 'lost' potential funding sources at both the SWUE and PW.
- 5.7 The funding shortfall of c.£70-£77 million between total cost and DfT award is therefore a major unresolved issue.

**APPENDIX A. FIGURES 20 AND 25 OF 2019 PSVLP
AECOM LOCAL PLAN TESTING**

Figure 20. Scenario 2 - AM 2036 - Node Delay (seconds)



Following the introduction of the Critical Development Enabling Schemes, the delays in the SE are reduced:

- Delays on arms at junctions along the A56 Chester Road in Grappenhall (junctions with Broad Lane and Knutsford Road) are reduced to less than 3 minutes in both locations.
- Delays on the B5356 Grappenhall Lane arm at the junction with Barleycastle Lane are reduced to less than 2 minutes on arms in this area.

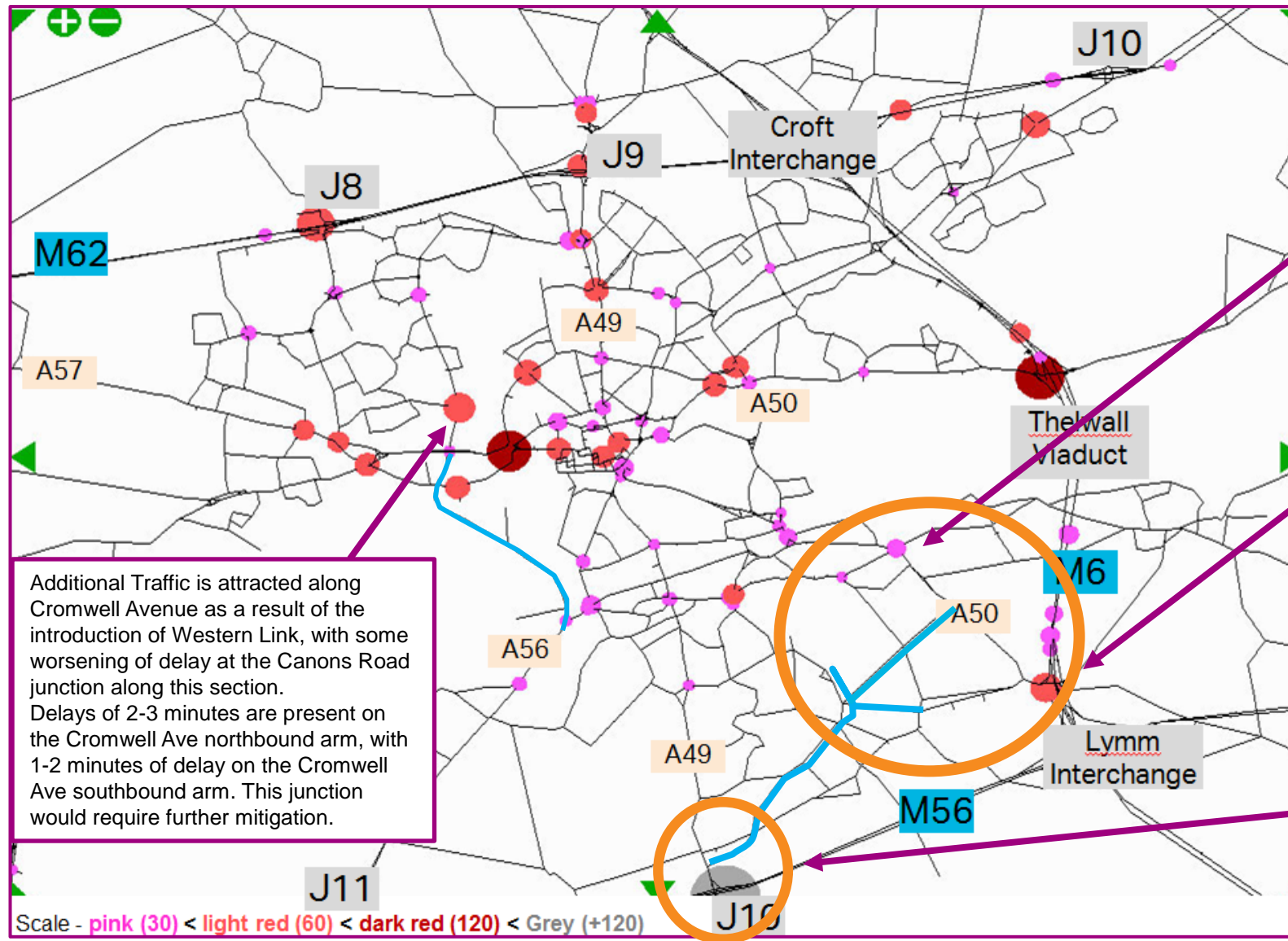
There is some small improvement in delay at M6 J20 (compared to Scenario 1) as a result of the additional schemes but does not remove the delay completely. This junction requires further mitigation.

Additional Traffic is attracted along Cromwell Avenue as a result of the introduction of Western Link, with some worsening of delay at the Canons Road junction along this section. Delays of 3 minutes are present on the Canons Road arm, with 4 minutes of delay on the Cromwell Ave southbound arm. This junction would require further mitigation.

There is some worsening of delay at M56 J10 as a result of the SE schemes but this is confined to two entry arms of the roundabout (M56 Westbound off-slip and the A559 Northwich Rd). The delays at both of these arms is a result of added circulatory demand on the roundabout coming from the A49 (London Rd), limiting the ability of traffic to enter the roundabout. Delays are between 2-3 minutes.

The Cat & Lion Junction improves as a result of the Cat & Lion bypass scheme being implemented (less than 2 minutes delay in this scenario).

Figure 25. Scenario 2 - PM 2036 - Node Delay (seconds)



Additional Traffic is attracted along Cromwell Avenue as a result of the introduction of Western Link, with some worsening of delay at the Canons Road junction along this section. Delays of 2-3 minutes are present on the Cromwell Ave northbound arm, with 1-2 minutes of delay on the Cromwell Ave southbound arm. This junction would require further mitigation.

Following the introduction of the Critical Development Enabling Schemes, the delays in the SE are reduced but there is still evidence of a 5 minute delay on the Broad Lane arm of the junction with A56 Chester Road (in Grappenhall).
 - Delays at the A50 Knutsford Road junction with A56 Chester Road (in Grappenhall) are now less than 2 minutes on any arm.
 - Delay along the B5356 Grappenhall Lane / Barleycastle lane arms are now less than 1 minute on any arm..

There is some small deterioration in delay at M6 J20 (now approximately 2 minutes on the gyratory compared to 1 minute in Scenario 1) as a result of the additional schemes. This junction requires further mitigation.

There is some worsening of delay at M56 J10 as a result of the SE schemes.
 - M56 J10 - M56 Westbound off-slip and the A559 Northwich Rd are the two arms affected here. The delays at both of these arms is a result of added circulatory demand on the roundabout coming from the A49 (London Rd), limiting the ability of traffic to enter the roundabout. Delays are between 2-4 minutes on these arms.

The Cat & Lion Junction improves as a result of the Cat & Lion bypass scheme being implemented (previously 3 minutes delay in Scenario 1, now less than 2 minutes delay).

APPENDIX B. CORRESPONDENCE WITH WBC

Steven Eggleston

From: Pennington, Kevin [REDACTED]
Sent: 27 October 2021 09:38
To: Steven Eggleston
Cc: [REDACTED]
Subject: RE: Warrington Local Plan - omission of highways evidence

Steven,

I am liaising with our third parties on when information can be extracted and issues out. Once I have this information we will get back to you.

Regards

Kevin Pennington

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Steven Eggleston [REDACTED]
Sent: 27 October 2021 09:31
To: Pennington, Kevin [REDACTED]
Cc: [REDACTED]
Subject: FW: Warrington Local Plan - omission of highways evidence

Kevin

Further to my email below and the earlier emails from Turley to the Council, are you able to confirm when the data requested can be supplied and provide the information that should be readily available, as set out below, by return? The information is now needed urgently given the PSVLP consultation deadline.

Kind regards, Steve



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



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From: Steven Eggleston

Sent: 22 October 2021 09:08

To: [Redacted]
Cc: [Redacted]

Subject: FW: Warrington Local Plan - omission of highways evidence

Kevin

I spoke to Alan Dickin yesterday and I understand from Alan that you are dealing with the below.

Please can you confirm the timescales for us receiving the data/information set out below? Much of the data, including the Multi-Modal Model Forecasting Report, the uncertainty log, LINSIG models and scheme plans (items I, II, VII and VIII below) should be readily available and please can these be supplied by return?

From reviewing the evidence base of the PSVLP, it appears that the Mott MacDonald technical note titled 'Full Build Out Scenario' (reference 411029-MMD-17-XX-XX-C-0004-P03 dated 1 September 2021) is the only published evidence available that assesses impacts of the South West Urban Extension and Port Warrington/Commercial Park on the Western Link. Please can you confirm this is the case?

Kind regards, Steve



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From: Andrew Bickerdike [Redacted]

Sent: 18 October 2021 09:56

To: [Redacted]

Cc: Steven Eggleston [Redacted]

Subject: RE: Warrington Local Plan - omission of highways evidence

Thank you for your response Michael,

I appreciate you speaking with colleagues. In any case, we will make a direct approach also via Peel's appointed consultants, I-Transport.

Kind regards

Andrew Bickerdike
Director

Turley



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From: Bell, Michael [Redacted]

Sent: 15 October 2021 16:24

To: [Redacted]

Subject: RE: Warrington Local Plan - omission of highways evidence

Andrew,

The Council does not consider that the requested detailed highways information is required in order to provide a meaningful response to the regulation 19 consultation. As such the Council does not consider that your client's engagement in the plan making process has been prejudiced.

The Council considers that the Plan is justified, providing an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. You are obviously entitled to disagree with this in your representation.

Whilst the Council considers it would be disproportionate to provide this level of information for the regulation 19 consultation, we will endeavour to positively engage with you as soon as practical in order to provide as much of the information that you have requested as is reasonable and as soon as practical. I will be speaking to colleagues in our Transportation Team and I will shortly confirm the timescales for providing this information.

regards

Michael Bell
Planning Policy and Programmes Manager

Planning Policy and Programmes
Growth Directorate
Warrington Borough Council
East annexe
Town Hall
Sankey Street
Warrington
WA1 1UH

[REDACTED]

From: Andrew Bickerdike [REDACTED]
Sent: 12 October 2021 19:32
To: [REDACTED]
Subject: Warrington Local Plan - omission of highways evidence

Good afternoon Michael,

On behalf of my client, Peel Land and Property, we are presently preparing representations to the proposed submission Warrington Local Plan. I have been asked to draw attention to the omission of a number of items within the transport / highways evidence provided on the Council's website without which we are unable to fully understand, review and scrutinise this critical part of the Local Plan evidence base for the purpose of preparing representation in relation to my clients interest.

This prejudices my client's engagement in the plan making process.

As a matter of urgency, and by reference to the material made available on the Council's Local Plan evidence base page ([Evidence base - Updated Proposed Submission Version Local Plan 2021 | warrington.gov.uk](https://warrington.gov.uk/evidence-base-updated-proposed-submission-version-local-plan-2021)), I would ask that the Council makes the following available for review and comment as part of the current consultation:

- I. The Forecasting Report for the Multi-Modal Model used to derive the traffic forecasts used in the Mott MacDonald technical note.
- II. The uncertainty log and confirmation of the development sites included in scenario DD022036 (Mott MacDonald section 1).
- III. The traffic forecasts for scenarios DD022036 and FBO2036 used by Mott MacDonald for the AM and PM peak hours. Please can the peak hours be confirmed. Please can SATURN output plots/prints be provided showing link flows and turning movements at all junctions along WWL including the terminal junctions at A56 and A57.
- IV. Confirmation of the locations of the development sites set out in Mott MacDonald Table 1 if these are not apparent from the forecasting report and/or uncertainty log (i) and (ii) above).
- V. The assumptions made regarding the split of B2/B8 uses at Port Warrington (Mott MacDonald Table 1 ID Site 4), the split of B1a/b uses at Warrington Commercial Park (Mott MacDonald Table ID Site 5) and the split of B1c/B2/B8 uses also at Warrington Commercial Park (Mott MacDonald Table 1D Site 6).
- VI. Full details of the convergence statistics for the SATURN model runs for scenarios DD022036 and FBO2036 as well as trip matrix totals for the AM and PM peak hours (Mott MacDonald para 2.2.1).
- VII. Scale plans in PDF and CAD format of the A56/WWL and A57/WWL junctions (MM Figures 1 and 6).
- VIII. The LINSIG models of the A56/WWL and A57/WWL junctions (Mott MacDonald Tables 3,4,5 and 6 and Figures 2,3,4,5,7,8,9 and 10).
- IX. Details of the calculation of saturation flows and the calculation of the intergreen times adopted in all the LINSIG models if these are not apparent from the models themselves.
- X. Please can you also confirm whether the LINSIG models take any account of the implementation of MOVA at the junctions?
- XI. Details of how the two-way AAWT traffic flows have been calculated in Mott MacDonald Table 7. Please can the traffic flows for the individual time periods (AM and PM peak hours/periods, inter-peak period etc.) be provided. Please can the traffic flows associated with the South West Urban Extension and Port Warrington be provided.

I look forward to hearing from you.

Kind regards

Andrew Bickerdike
Director

Turley



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i-Transport



Appendix 2: Secondary school education technical note



Warrington South Western Urban Extension Secondary School Position

This briefing note has been drawn up on behalf of Peel L&P Holdings (UK) Ltd to review the secondary school position with regard to the needs arising from the proposed South Western Urban Extension (SWUE) as part of the Local Plan going forward.

It will conclude that across the Borough sufficient spaces will exist to meet the needs of the SWUE across Warrington through the Local Plan period. It will also conclude that while some local shortfalls of places may be identified, these can be resolved through the efficient working of the admissions system and the existing fluidity of school admissions across Warrington.

1. Introduction

1.1 The proposed site lies to the south west of Warrington immediately to the south of the Manchester Ship Canal (MSC). It was originally identified as a potential residential site by Warrington Borough Council (WBC) but has not been included within the latest version of the Local Plan - Reg 19 version dated September 2021. One reason for this is specified in the Development Options and Site Assessment Technical Report (September 2021 – Appendix 5, Option 5) on the basis that “... *there are likely to be pressures on existing infrastructure in south Warrington, in particular in respect of secondary school provision...*”. The site was originally identified as having the potential to yield 1,700 dwellings, but for the purposes of this paper, a figure of 1,800 has been adopted as being deliverable.

1.2 The WBC has a Planning Obligations SPD dating to January 2017, which uses a pupil product ratio (PPR) of 0.18 to calculate the approximate number of secondary age pupils likely to arise from new developments. When this is applied to the 1,800 dwellings currently proposed, a total of 324 pupils is calculated, representing approximately 2.16 Forms of Entry (2.16FE).



1.3 This paper will review the secondary position, both locally and for the Borough of Warrington to demonstrate that across the period of the Local Plan 2017-37 sufficient secondary school places will exist to meet, not only the needs of pupils arising from the SWUE but also from the totality of the housing identified within the emerging Local Plan.

2. Borough Situation

2.1 The proposed development site lies just south of the MSC close to the with Halton (Map 1). However, while some cross boundary movement is inevitable, as each education authority has responsibility for the children residing in its area, only the schools within the Warrington boundary will be reviewed here.

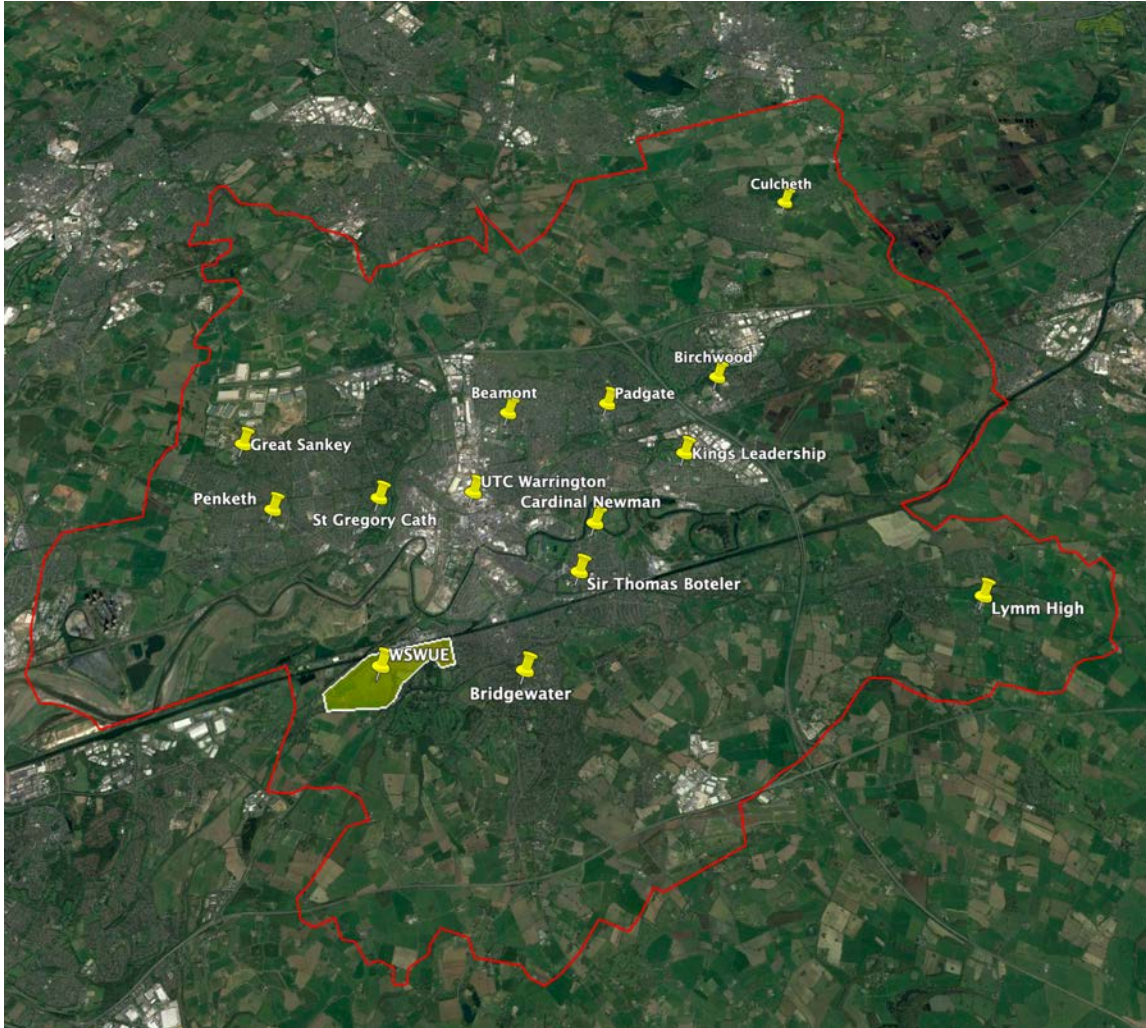


Map 1: Site of proposed development and Warrington Borough Boundary (approximate)

2.2 There are thirteen secondary schools within Warrington, the majority of which are located in the urban area north of the canal (Map 2) with three more rurally located to the north east, south and south east of the Borough. One of the schools is a University Technical College, which accepts pupils at age 14, the remainder accept pupils at age 11. Four of the



schools host sixth form capacity, but for clarity of data this will not be examined in detail within this report



Map 2: Warrington secondary schools

2.3 The schools’ capacity and roll data are shown in Table 1. Between them, the schools have capacity for 13,502 main school pupils, excluding sixth form capacity, which provides a further 1,677 places. At present there is a total of 12,377 main school pupils on roll, leaving a surplus of 1,125 places across the Borough. The majority of the surplus places exist within the older year groups with the younger years showing higher numbers of pupils. This is largely due to the failure of the UTC Warrington to admit fully at Year 10, which leaves surplus capacity from that point.



School	Postcode	Distance	P Area	CAP	PAN Yr R	PAN Yr 10	NoR	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11
Penketh High	WA5 2BY		8770012	1200	180	180	820	150	166	146	160	198
Great Sankey High	WA5 3AA		8770012	1536	375	375	1770	374	375	368	337	316
St Gregory's Catholic High	WA5 1HG		8770012	1141	240	240	1096	239	244	235	191	187
King's Leadership Acad	WA1 4PF		8770013	600	120	120	694	164	151	135	123	121
Culcheth high	WA3 5HH		8770013	1296	240	240	1174	240	239	232	233	230
Birchwood community High	WA3 7PT		8770013	1050	170	170	790	161	153	145	153	178
Beamont Collegiate Acad	WA2 8PX		8770014	1065	180	180	914	180	183	182	180	189
UTC Warrington	WA2 7NG	2.7	8770014	283	0	130	108	0	0	0	53	55
Sir Thomas Boteler CE High	WA4 1JL	2.9	8770014	825	165	165	615	134	147	134	108	92
Padgate Acad	WA2 0LN		8770014	750	150	150	502	110	125	100	82	85
Cardinal Newman Catholic High	WA4 1RX		8770014	825	165	165	795	157	162	172	155	149
Bridgewater High	WA4 3AE	2.15	8770015	1522	300	300	1544	306	314	316	306	302
Lymm High	WA13 0RB	3+	8770015	1409	300	300	1555	308	319	309	308	311
			Total	13502	2585	2715	12377	2523	2578	2474	2389	2413
			Surplus				1125	62	7	111	326	302

Table 1: Warrington secondary schools (excluding 6th form)

2.4 It is important to note at this stage that patterns of admission across the Borough show that many pupils do not automatically attend their closest school. Parents are entitled to express a preference for their favoured schools(s) and this results in pupils being admitted to schools which are not their closest.

2.5 Within Warrington this is particularly clear for Lymm High School, which has on roll pupils from Grappenhall and Partington and Sir Thomas Boteler High School which takes many pupils from south of the MSC. The majority of the central Warrington schools admit pupils for whom the school is not the most local. It is notable that in the admissions round for September 2021, WBC data lists two schools, Padgate Academy and Penketh High School, which admitted their last pupil from “more than 10 miles away” in a straight line, and four others admitted their last pupil from three or more miles away.

2.6 This emphasises the fluid nature of school choice and admissions across the Borough and suggests that in a situation of local deficit places, the admissions patterns will have the flexibility to adapt to local pressures by “pushing back” applications from less local pupils.

2.7 Each year, WBC is required to provide to the Department for Education (DfE) forecasts of pupil numbers based on groups of schools within its area. There are four groups within Warrington, and when combined the forecasts based on Spring 2019 were as shown in Table 2. No forecasts were published in 2020 due to the Covid situation.

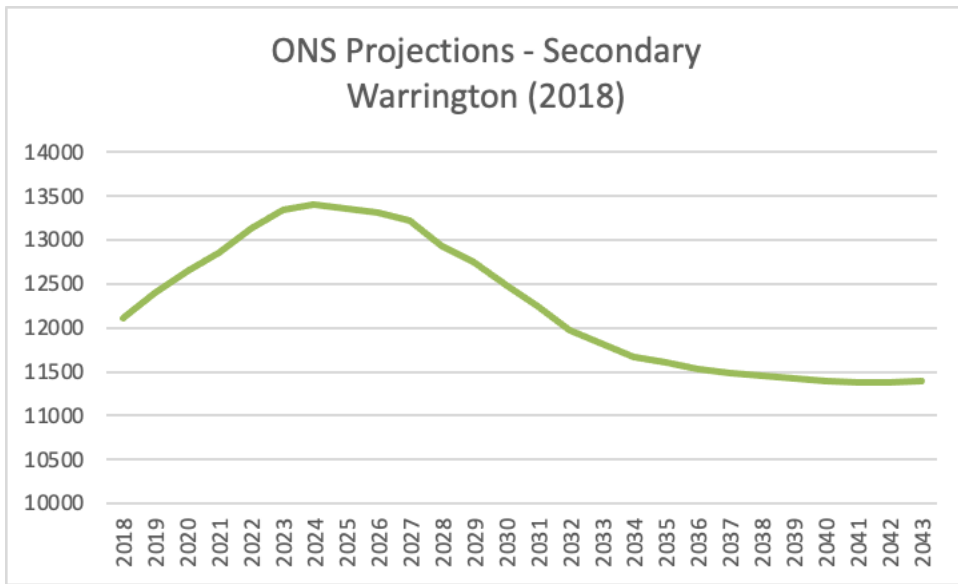


8770012, 13, 14 & 15	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Main Total
May 2019 Actual	2495	2373	2408	2382	2268	11926
2019-20 F/c	2579	2509	2398	2416	2406	12308
2020-21 F/c	2549	2609	2537	2416	2444	12555
Spring 2021 Actual	2523	2578	2474	2389	2413	12377
2021-22 F/c	2697	2584	2642	2550	2449	12922
2022-23 F/c	2764	2721	2607	2657	2573	13322
2023-24 F/c	2795	2790	2744	2624	2679	13632
2024-25 F/c	2765	2811	2805	2753	2638	13772
2025-26 F/c	2710	2792	2832	2826	2777	13937
Total Listed PAN / Capacity	2585					13502

Table 2: Warrington combined secondary forecast

2.8 WBC clearly anticipates a deficit of approximately 435 places by 2025-26. There are, however, two things to note. The first is that the actual number of pupils on roll in Spring 2021 (pink highlighted row) is some 178 pupils lower than forecast for that year (row above). It appears that the forecast anticipates in-year growth as pupils move through the school system, but the check on the actual suggests that this has not occurred and that the numbers of pupils in each cohort has remained largely stable as they progress. Consequently, the forecasts could be overstated by that number, and this may slow down the arrival of any deficit. Admissions data published by WBC indicates that places were offered to 2,557 Year 7 children for September 2021. While this is higher than in 2020, it is 140 below the forecast figure for 2021-22 and will exacerbate the over-forecast currently shown.

2.9 The second thing to note is that the 2018 based ONS Population Projections for Warrington for the 11-15 year-old age group shows that while numbers are currently expected to rise through to 2024, they are then due to level off, before commencing a significant decline – of approximately 2,005 children. The ONS Projections are trend based and take into account the effect of population migration, births and will include the impact of new housing in prior years (delivered at an average of 639 dwellings per annum since 2001).

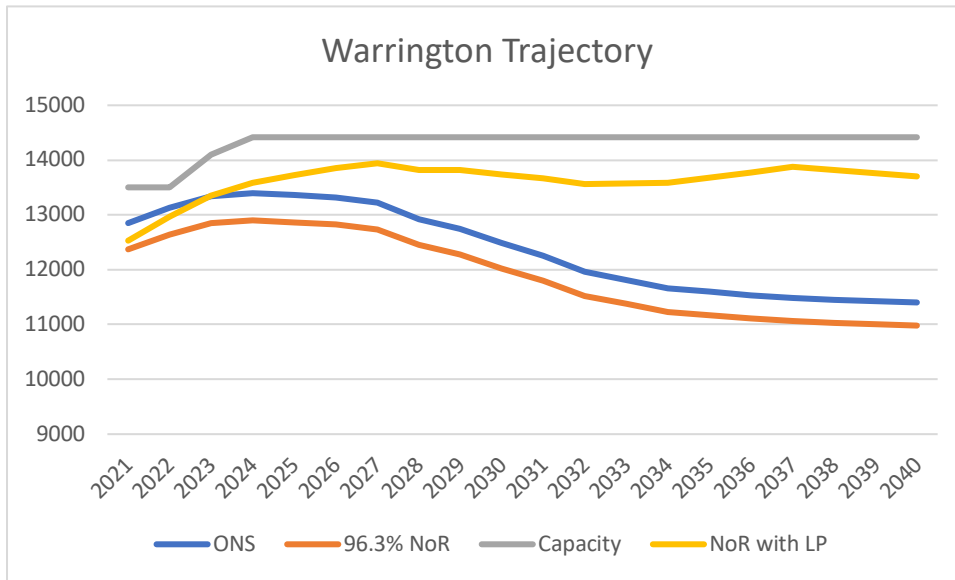


Graph 1: ONS Projections for secondary age children (2018 base)

2.10 There is no indication that the stabilisation and subsequent reduction in child numbers within Warrington post-2024 has yet been factored into WBC’s forecasts. With 2024 now just three years away there is every suggestion that by the time the major Allocations start to come forward, this change in population will have become noticeable and the secondary school population will have started to decline, if it has not already done so.

2.11 A trajectory to model future pupil numbers into the future within the Borough has been constructed and is shown in Graph 2. It is based on the ONS Projections with additions made for the Local Plan housing target of 16,495 (2021-37) spread across the Local Plan period. The Borough’s pupil product ratio of 0.18 has then been applied and decayed to the Borough average of 0.139 across twenty years.

2.12 The trajectory gives a picture of a rapidly falling number of secondary-age children living in Warrington, from 2024 onwards (blue line). A reduction has been made to account for the fact that WBC school rolls reflect a 96.3% take-up rate of places (orange line) and the Local Plan housing targets are then added in (yellow line). Capacity rises to 14,417 following the planned addition of 300 places at Bridgewater High School, 75 places at Sir Thomas Boteler CE School and 240 places at St Gregory’s Catholic High School - and is not exceeded within the Local Plan Period.



Graph 2: Warrington trajectory including Local Plan Housing

2.13 In summary, in a complex situation and with updates not yet published, it appears probable that WBC has overstated the impact of population growth in its forecasts for at least Spring 2021 and 2022. It is becoming clear that the numbers emerging in the medium term for the Borough will be lower than anticipated. In addition, the decline in the numbers of secondary-age children projected by the ONS is currently of such an extent that the full quotient of Local Plan housing could be accommodated with little need for further capacity additions, through to at least the end of the Local Plan period.

2.14 In these circumstances there can be no question that across the whole of the Borough there will be sufficient secondary school places to meet the needs of the Local Plan housing, including the proposed development of the SWUE. With current admissions patterns, at least some of these surplus places will become available for the secondary age children moving into new homes in the southern part of Warrington.

3. Local Situation

3.1 There are three schools within the statutory walking distance of the proposed SWUE development site, Bridgewater High, St Thomas Boteler CE High and the UTC Warrington. Focusing on the two mainstream schools which admit pupils at Year 7 (aged 11), a similar picture to the one in Table 1 emerges, with 188 surplus places currently available, the



majority of which are within Years 10 and 11. Both schools admitted fully for September 2021 and the picture suggests pressure could emerge in the system before long.

3.2 The UTC Warrington has not recruited fully for some years and in its main school years had 108 on roll in Spring 2021 compared to capacity of 260. It accepts pupils from across Warrington at Year 10 and specialises in science, technology and engineering – it does not provide Year 7, 8 or 9 places. As such, while it is part of the secondary school offer within Warrington, it has a specific rather than a general offer and will not be considered in detail here, other than to note that some secondary places remain available here, but only within the two last mainstream year groups.

3.3 Bridgewater High School, the closest school to the SWUE, is grouped with Lymm High School to the east for planning and forecasting purposes. Both schools are located south of the MSC and serve the southern rural extent of Warrington, the data provided in Table 3, shows that both schools are currently under some pressure, with a deficit of 168 places in Spring 2021, distributed across all year groups.

School	Postcode	Distance	P Area	CAP	PAN Yr 7	NoR	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11
Bridgewater High	WA4 3AE	2.15	8770015	1522	300	1544	306	314	316	306	302
Lymm High	WA13 0RB	3+	8770015	1409	300	1555	308	319	309	308	311
			Total	2931	600	3099	614	633	625	614	613
						-168	-14	-33	-25	-14	-13

Table 3: Warrington South secondary schools

3.4 The WBC forecast for this group of two schools is shown in Table 4. It shows that the schools accepted in excess of their admission numbers in both September 2018 (May 2019 actual) and in 2020 (2021 Actual) and are expected to continue to do so. Published WBC data states, however, that offers were made to just 600 pupils by the two schools for September 2021, in line with their published admission numbers.



South - 8770015	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Main Total	Post-16	Total
May 2019 Actual	627	615	609	597	590	3038	377	3415
2019-20 F/c	632	635	628	611	609	3115	369	3484
2020-21 F/c	641	642	645	631	621	3180	371	3551
Spring 2021 Actual	614	633	625	614	613	3099	404	3503
2021-22 F/c	643	649	650	646	639	3227	366	3593
2022-23 F/c	686	650	657	651	654	3298	377	3675
2023-24 F/c	679	690	654	653	655	3331	374	3705
2024-25 F/c	661	679	690	647	653	3330	370	3700
2025-26 F/c	668	663	681	686	650	3348	363	3711
Total Listed Capacity	600					2931		3431

Table 4: Warrington South secondary forecast Spring 2019

3.5 As with Warrington as a whole, the actual rolls recorded in Spring 2021 are lower than were forecast by WBC, and again this is likely to produce a slower overall rise in numbers.

3.6 What is also clear, however, is that Warrington schools admit pupils from Boroughs outside Warrington, in the south from Runcorn, Cheshire West and Chester as well as Cheshire East. In 2020 Warrington schools had on roll 185 pupils from these three authorities, while just 26 from Warrington took up places in schools in them. Thus, for the southerly part of Warrington, there was a net inward migration of 159 pupils. In Warrington Borough the trend has been in the other direction, with 463 children travelling to schools outside the authority (mostly St Helens and Trafford) and 365 travelling in to Warrington schools (mostly Halton, Salford, St Helens, Trafford and Wigan).

3.7 Nonetheless, for the southern part of Warrington, there is a significant number of pupils travelling into the Borough to take up places in Bridgewater High School and Lymm High School and were the SWUE to go ahead, pupils living there would take admissions priority over many non-Warrington pupils on the grounds of proximity. This suggests that up to 159 places could gradually become available as the SWUE is constructed.

3.8 ONS Mid-Year Estimates of population for the Wards south of the MSC indicate that in 2020, by year group, there were more children of secondary age currently living in that area than younger children. Table 5 shows the current 11-15 year-olds estimated by the ONS to be living in the Wards:



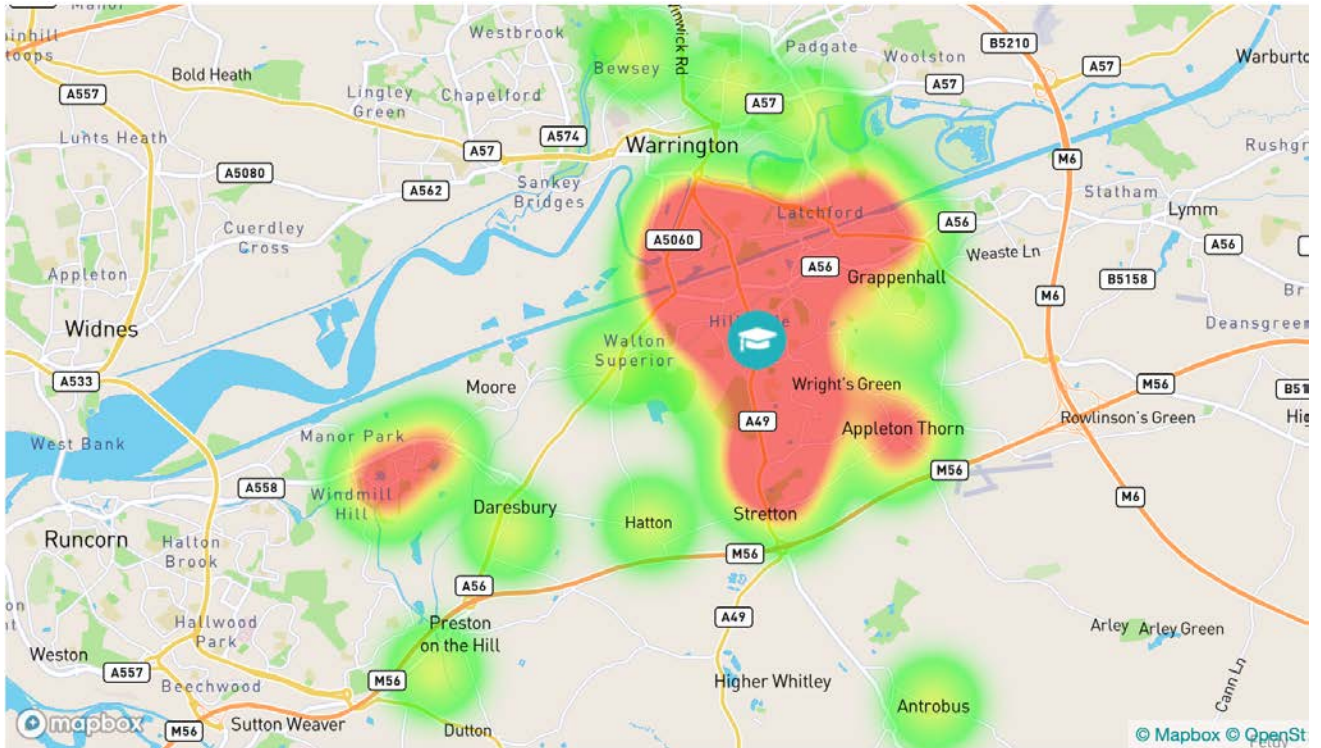
Year of Age	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Children Resident	290	321	342	377	429	447	440	454	434	475	470	476	500	500	493	506
2020																2,475
2021																2,439
2022																2,421
2023																2,355
2024																2,309
2025																2,273
2026																2,250
2027																2,204
2028																2,147
2029																2,035
2030																1,916
2031																1,759

Table 5: ONS Population Estimates – Southern Wards

3.9 For 2020, approximately 2,475 11-15 year-olds were estimated as resident. As these children move through the system over time they are replaced by smaller numbers of younger children, until by 2031 the numbers have fallen to 1,759. Both of these figures are far lower than the number of children attending the two southern group schools (3,099) and the schools’ capacity (2,931). Clearly, a considerable number of the schools’ current pupils are travelling in from other parts of Warrington, and beyond.

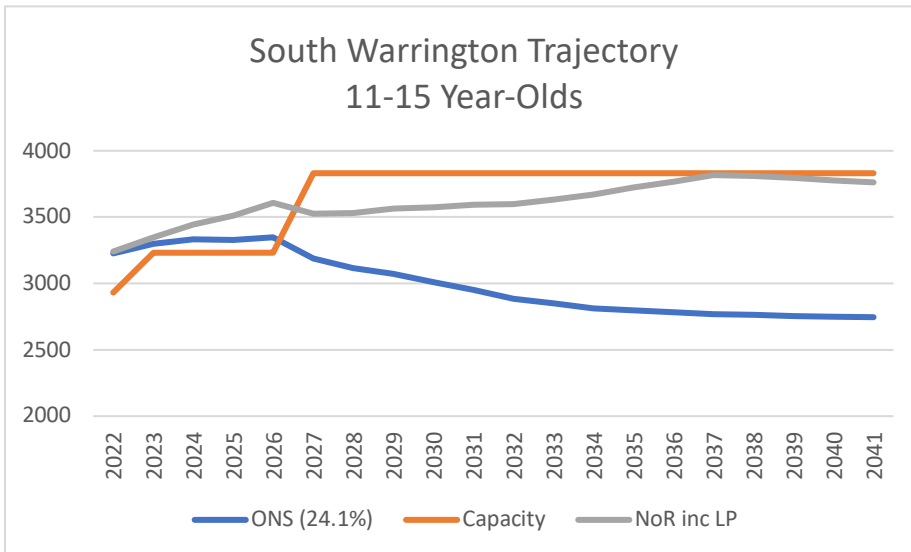
3.10 While this does not, of course, account for additional housing or future increases in the birth rate, it has to bring into question the forecasts shown in Table 4. Even with approximately 400 dwellings currently under construction in the area south of Bridgewater High School, producing approximately 72 additional pupils, there is still a potential reduction in local child numbers of 644 by 2031.

3.10 It appears that Bridgewater High School is a major draw for pupils from north of the MSC and from other neighbouring authorities. A “heat map” of school attendance (Map x) shows clearly the extent of this pattern, with many pupils travelling from north of the MSC as well as from Windmill Hill in Halton, 3.75 miles to the west and some from Cheshire West and Chester, four miles to the immediate south.



Map xx: Bridgewater High School – Heat map 2020

3.11 A trajectory (Graph 4) has been prepared on the basis of the two schools sitting south of the MSC. The forecast numbers on roll for 2026 at the two schools have been apportioned to the ONS Projection for Warrington (25.14%) and carried forward at that proportion through to the end of the Local Plan period.



Graph 4: South Warrington ONS including Local Plan Housing



3.12 Current Allocations proposed for developments south of the Canal, together with the SWUE have then been factored in, to a total of 6,126 dwellings, and these comprise:

- SEUE – 2,400
- SWUE – 1,800
- Fiddlers Ferry – 1,310
- Thelwall Heys – 310
- Lymm - 306

In addition, expansion works at Bridgewater High School and the new 4FE school proposed for the South Eastern Urban Extension have also been included. The proposed developments have been spread through the Local Plan period and a model decaying from 0.18 to 0.139 pupils per dwelling over a number of years has been employed.

3.13 The capacity line (orange) is shown rising on two occasions; the first represents the expansion of Bridgewater High School while the second is the potential new school at 4FE to meet the needs of the SEUE.

3.14 This trajectory (grey line) demonstrates that the area will be technically short of places until approximately 2026 when the ONS Projections start their downward movement and the new school is shown. This shortfall is, in part, a pre-existing problem which WBC is making efforts to meet. However, with the LP housing coming forward during the period, the need for the 4FE school is clear, and once that is in place the area’s needs will be met.

3.15 If, for some reason, the South Eastern Urban Extension and its attendant school did not progress within the Plan period, but the SWUE did, a similarly based trajectory indicates that the development of approximately 3,746 dwellings in the southern area would peak at a temporary deficit of between 107 and 270 pupils. The lower figure excludes the admission of pupils from outside of the Borough. In either scenario, the deficit could be met through the “push-back” of pupils to outside of the Borough or to schools with surplus places elsewhere in Warrington. This would be facilitated by the provision of the western access which is planned to cross the MSC, railway and River Mersey between the site of the SWUE and west Warrington.



3.16 As an alternative, the expansion of Lymm High School could also be considered. Although already a large school, its site is of a size (15.5ha) which indicates a maximum of 2,900 pupils - 1,000 more than it accommodates at present.

3.16 In summary, it is agreed that there is currently pressure on places for the South group of schools. However, as with the Borough as a whole, a review of the actual figures on roll and the ONS Projections suggests that the WBC forecast are set higher than is likely to become the case. While the addition of a new 4FE school within the SEUE would be a useful local addition, were that development not to progress, the needs arising from the remaining developments and the SWUE could be met through the use of places elsewhere in Warrington through the “pushing-back” of admissions - or consideration of a small expansion of Lymm High School. While this school is further than the statutory three mile walking distance from the proposed SWUE, it regularly accepts a large number of its pupils from the Grappenhall / Stockton Heath area.

4. Conclusions – Borough Wide

4.1 Forecasts – it is far from clear that WBC’s forecasts are currently as accurate as they could be as forecasts were not collected or published by the DfE in 2020. There are fewer pupils listed on roll at the Borough’s schools than were forecast in 2019 and this will undoubtedly have a knock-on effect in forthcoming years. Consequently, it is highly likely that there will be more places available than forecast through to 2025-26.

4.2 Long-Term Projections – the ONS-based trajectory for the area shows that the impact from the housing will not all come at once and that the significant reductions in the long-term projections will make sufficient places available to meet the housing need through to 2037.

4.3 Borough-wide, therefore, there can be no objection to the proposed SWUE development as one of a number of Allocations within the Local Plan.

5. Conclusions – Local

5.1 The local position, when focusing on the area south of the MSC, is that there are fewer children resident there than attend the two local schools. Pupils travel from south central Warrington to attend Bridgewater High School. There is also a net gain of



approximately 159 pupils travelling in from other Local Authorities to the area. With fluidity of admissions across the Borough, admissions for these pupils will naturally be pushed back to closer to their home area as and when pressures increase in the southern group of schools.

5.2 An assessment of the proposed Allocations together with 1,800 additional dwellings in the SWUE shows that there would be a need for the proposed new school at the SEUE, and with this in place there would be sufficient places for all pupils throughout the period.

5.3 Were the SEUE not to progress, or to progress later in the period, and the new 4FE school be delayed, this could create some issues in meeting the need for new pupils particularly in the early part of the period before the ONS Projected decline in numbers starts to take effect. The impact could be as high as approximately 270 pupils in excess of the places available.

5.4 However, this could be met through the flexible and fluid admissions patterns seen across the Borough, with schools just north of the MSC accepting more pupils from the south than currently is the case. An alternative would be for an expansion of Lymm High School to be considered.

5.5 While the potential for some pressure the southern area is acknowledged, it is not calculated to be of such a scale that should prevent consideration of the SWUE being included within the Local Plan Allocations.

Heather Knowler
Consultant – EFM Partnership Ltd
V2: 11 November 2021

Appendix 3: South West Urban Extension Transport Appraisal



Warrington Borough Council Local Plan
South West Urban Extension

Transport Appraisal

Client: Peel L&P Holdings (UK) Ltd

i-Transport Ref: SEE/JO/dc/ITM13243-002H R

Date: 15 November 2021

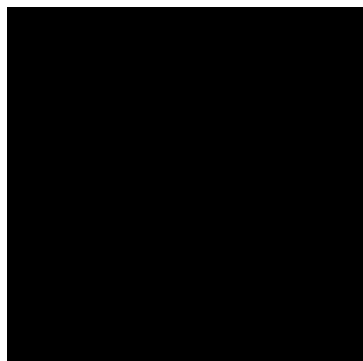
Warrington Borough Council Local Plan
South West Urban Extension

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Date: 15 November 2021



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Quality Management

Report No.	Comments	Date	Author	Authorised
ITM13243-002R	Draft	3 July 2018	S Eggleston	S Eggleston
ITM13243-002 A R	2 nd Draft	31 October 2018	S Eggleston	S Eggleston
ITM13243-002 B R	Final Draft	2 November 2018	S Eggleston	S Eggleston
ITM13243-002 C R	Revised Final Draft	29 November 2018	S Eggleston	S Eggleston
ITM13243-002 D R	Updated Final Draft	21 May 2019	S Eggleston	S Eggleston
ITM13243-002 E R	Final	13 June 2019	S Eggleston	S Eggleston
ITM13243-002 F R	Revised Final	14 June 2019	S Eggleston	S Eggleston
ITM13243-002 G R	Updated Local Plan	09 November 2021	Jonathan Orton / S Eggleston	S Eggleston
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SECTION 1 Introduction

1.1 Warrington Local Plan Review

1.1.1 Warrington Borough Council (WBC) is currently consulting on its Updated Proposed Submission Version Local Plan (UPSVL) which will guide development in the Borough to 2038.

1.1.2 WBC's consultation document of September 2021 sets out how the UPSVL was developed, including the work undertaken to develop its Spatial Strategy which has emerged following the 'call for sites' process and a large number of representations made to previous Local Plan consultations. The UPSVL identifies main development areas within the urban area and further development is planned within Warrington's outlying settlements.

1.1.3 The Local Plan Key Diagram, identifying the main areas proposed for development, is included as Figure 3 of the UPSVL.

1.1.4 The Council is also proposing to deliver a major new road scheme, the Warrington Western Link (WWL), and conditional funding for around two-thirds of this has been approved by the Department for Transport (DfT). The WWL will provide a new road connection to the south-west of Warrington town centre, linking the A56/A5060 Chester Road with the A57 at Great Sankey. The scheme is designed to achieve several objectives that include providing congestion relief to the town centre and enabling the development of land that is currently poorly served by road infrastructure. Further details of the WWL are set out in Section 2.0.

1.1.5 The South West Urban Extension (SWUE) was included as a draft allocation in the Council's 2019 Proposed Submission Version Local Plan (PSVLP) as policy MD3. This allocation in PSVLP was supported by highway evidence. I-transport submitted a transport appraisal to support the SWUE in 2019. The Council has now changed its position in relation to SWUE, now not proposing it as a draft allocation (partly) on the basis that it would have adverse impacts on the Warrington Western Link (WWL).

1.1.6 The Council's rationale is set out in their report to Cabinet of 13 September 2021 and repeated in the 2021 UPSVL and Appendix 6 of the Development Options and Site Assessment Technical Report (September 2021). These appear to be based on a technical note produced by Mott MacDonald for WBC.

- 1.1.7 The concerns of the Council have been addressed in separate submissions to the 2021 UPSVLP consultation. These conclude that development at the SWUE will not result in severe impacts on the WWL. Where relevant, the matters addressed in separate submissions are summarised in this report.

1.2 **Peel L&P's Land Interests at SWUE**

- 1.2.1 This report is prepared on behalf of Peel L&P (Holdings) Ltd hereafter ("Peel"). Peel L&P's holdings are concentrated in the north west of England but it also owns and manages significant assets throughout the UK. Peel L&P has a successful track-record in delivering growth and transformational projects including the Trafford Centre and Media City UK. Peel L&P owns and manages 12 million sqft of property and 20,000 acres of land and water.

- 1.2.2 SWUE is controlled by a number of landowners, the majority of the site is controlled by Story Homes, Ashall Property, Riley Properties and Peel. These landowners have established a Consortium to work together in the developing a masterplan for the SWUE. Masterplanning identifies that this is capable of delivering around 1,780 new residential dwellings as well as supporting and complementary uses including a primary school and mixed-use local centre. Ashall Property and Story Homes have submitted a separate set of transport representations to the Local Plan consultation for the SWUE.

1.3 **Report Structure**

- 1.3.1 This transport appraisal considers the transport and highways related aspects of the development proposals at the SWUE, demonstrating that these are sustainable and deliverable.

- 1.3.2 The background to the consideration of the site by WBC and the overall policy position, focussing on transport, is set out in Section 2.0. This includes consideration of the 2019 PSVLP and 2021 UPSVLP and a summary of the proposed Western Link Road. Section 3.0 explains the development proposals. The key transport related 'tests' set out in paragraphs 110 and 111 of the National Planning Policy Framework (NPPF) are then considered: Section 4.0 shows that the site will be accessible and sustainable and that the opportunities for using sustainable transport modes will be taken up; Section 5.0 demonstrates how safe and suitable access will be provided

to the site; and Section 6.0 outlines matters related to the off-site traffic impacts of the proposals including the Council's concerns related to impacts on WWL.

- 1.3.3 This forms one of a suite of reports commissioned to inform the development of a masterplan for the SWUE and to assess its deliverability. Together, these reports form part of the evidence base which underpins the suggested allocation of the site through the emerging Local Plan.

1.4 Conclusions

- 1.4.1 A summary of the overall conclusions is presented at Section 7.0. The key conclusions of this appraisal are:

- i The SWUE 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 SWUE 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.
- ii The SWUE will meet the transport related objectives of the Council's UPSVLP; it will meet objective W4 of the Local Plan and, considering the five specific accessibility criteria defined by the Council, it will result in strong positive effects by meeting three of these and positive effects by meeting one.
- iii The development of the SWUE will therefore fully accord with the NPPF objective related to sustainable travel, with many opportunities for such modes to be taken up.
- iv Access to the SWUE is proposed off Chester Road and Runcorn Road and feasibility level designs of the principal accesses have been produced and the capacity of these considered. The access arrangements will operate satisfactorily and have been designed to the appropriate design guidance. Access to the SWUE is deliverable and achievable. It is therefore also concluded that satisfactory access can be provided in accordance with the NPPF.
- v The proposed Western Link will provide significant additional capacity in the central Warrington Road network and will assist in facilitating the full SWUE development proposals. WBC's concerns related to the impacts of the SWUE on the WWL have been addressed and it is concluded that the traffic flows generated by dwellings on the SWUE,

as well as the remainder of the UPSVLP development, can be accommodated on the surrounding highway network.

- vi The traffic flows associated with development delivered in advance of the Western Link will form only a small proportion of existing traffic flows, well within daily variations in traffic, and it is concluded that development can be released in advance of the opening of the WWL.
- vii The residual cumulative traffic impacts of development on the site will therefore not be severe and therefore, in accordance with the NPPF, development should not be prevented on transport grounds.

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

SECTION 2 Background

2.1 Overview

2.1.1 This section provides background to the consideration of the development proposals at the SWUE including:-

- The transport policy context;
- The 2019 UPSVLP Policy and commentary regarding the site; and
- The Western Link Road.

2.2 Transport Policy Context

2.2.1 This section considers both national and local policy related to transport and, in particular, how this frames the consideration of development proposals.

National Planning Policy Framework (NPPF)

2.2.2 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development noting that plan-making should positively seek opportunities to meet the development needs of an area.

2.2.3 The specific transport policies of the Framework are contained within its Part 9. Paragraph 110 sets out the key 'tests' for the consideration of the transport aspects of development proposals, stating that:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- ***appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;***
- ***safe and suitable access to the site can be achieved for all users;***
- ***the design of streets, parking areas, other transport element and the content of associated standards reflects current national guidance, including the National Design Guide and National Model Design Code; and***
- ***any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."***

2.2.4 Paragraph 111 goes on to confirm:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

2.2.5 Details of the sustainability of the site, access and traffic impacts are set out in Sections 4.0, 5.0 and 6.0 respectively.

2.2.6 Paragraph 104 sets out the principal transport matters that should be considered during the preparation of Local Plans:-

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a ***the potential impacts of development on transport networks can be addressed;***
- b ***opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;***
- c ***opportunities to promote walking, cycling and public transport use are identified and pursued;***
- d ***the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and***
- e ***patterns of movement, streets, parking and other transport consideration are integral to the design of schemes, and contribute to making high quality places.”***

2.2.7 Paragraph 105 goes on to note:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision making.”

2.2.8 Paragraph 106 notes that planning policies should, amongst others:

“a. support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

c. identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;

d. provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);”

2.2.9 The mix of uses are explained in Section 3.0 below, with these along with improvements to walking and cycling infrastructure contributing to sustainable travel patterns as set out at Section 4.0. The relationship of the SWUE to the WWL is considered throughout this appraisal.

2.2.10 Planning Practice Guidance (PPG) sets out further guidance on how the policies in the Framework should be applied and this has been considered in the preparation of this transport appraisal.

Warrington Updated Proposed Submission Version Local Plan (UPSVLN)

2.2.11 Warrington’s Local Plan will provide statutory planning framework for the Borough for the period 2021 to 2038. The Local Plan will replace the 2014 Local Plan Core Strategy.

2.2.12 The UPSVLN has a series of objectives that include:

“W4. To provide new infrastructure and services to support Warrington’s growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.”

2.2.13 Section 7 of the UPSVLN sets out policies related to objective W4 and these include:

“Policy INF1 – Sustainable Travel and Transport

To deliver the Council 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, the Council will expect development to:

1 General Transport Principles:

a Be located in sustainable and accessible locations, or in locations that can be made sustainable and accessible;

b Ensure priority is given to walking, cycling and public transport within its design, and reducing the need to travel by private car;

-
- c Provide infrastructure for the charging of plug-in and other ultra-low emission vehicles, in line with the Council's Parking Standards SPD (2015);*
 - d Support proposals that reduce the level of trips made by single occupancy cars;*
 - e Consider demand management measures including the effective allocation of road space in favour of public transport, pedestrians and cyclists;*
 - f Mitigate its impact(s) or improve the performance of Warrington's Transport Network, including the Strategic Road Network, by delivering site specific infrastructure which will support the proposed level of development;*
 - g Ensure traffic generated by development is appropriate to the type and nature of the routes available and that there is no adverse impact on the local community;*
 - h Improve and develop appropriate road, rail and water freight transport routes and associated multimodal freight transport facilities in order to assist in the sustainable and efficient movement of goods, in accordance with other relevant Local Plan policies;*
 - i Consider the impacts of the wider region's Strategic Road Network and work with adjoining Local Planning Authorities and wider stakeholders to assess the impacts of the transport initiatives outside the Borough, where impacts have been identified and need to be mitigated; and*
 - j Consider how development can be futureproofed, through the provision of measures to support new and emerging technologies, such as Autonomous Vehicles.*
- 2 Improve Walking and Cycling Facilities (Active Travel) including:**
- a Give a high priority to the needs and safety of pedestrians and cyclists in new developments, through the provision of high quality cycling and walking networks that seamlessly integrate with existing networks;*
 - b Improve way finding (including route signage);*
 - c Enhance and develop integrated networks of continuous, attractive and safe networks for walking and cycling including well designed and improved roads, Rights of Way and the Greenway Network (as shown on the adopted Policies Map). This should include appropriate segregation of users and high priority should be given to users at junctions. Where appropriate, the Council will consider the use of planning conditions or planning obligations to secure the required improvements;*
 - d Increase accessibility for all members' of society through improvements and the provision of new infrastructure to make the most of potential environmental, social and health benefits;*
 - e Give priority to routes linking residential areas (especially those in recognised areas of deprivation) with employment areas, transport interchanges and hubs, schools, Warrington Hospital and other local services and facilities;*

- f *Supporting the provision of new or improved routes between Warrington and surrounding local authority areas; and*
- g *Provide high quality secure and conveniently located bicycle parking facilities at new developments, at transport interchanges and hubs, the town centre and community facilities.*

3 Improve Public Transport Including:

- a *Secure improvements to public transport infrastructure and services (to include bus, rail, taxi and private hire) in partnership, where appropriate with operators and delivery partners;*
- b *Be located in areas with easy access to high quality regular public transport services, to ensure public transport is a viable and attractive option by integrating the development with existing public transport infrastructure and services;*
- c *Providing additional public transport infrastructure and services that are related in scale to the proposed development where existing facilities are not available or are in need of improvement or an appropriate subsidy to help mitigate the impacts of the proposed development;*
- d *Consider options to enhance Bus Priority at junctions and the provision of dedicated Bus lanes;*
- e *Support proposals for new public transport networks and services, such as future Mass Transit systems and low or zero emissions vehicles;*
- f *Support proposals for rail infrastructure and services and the provision of rail facilities appropriate; and*
- g Engage in proposals for the delivery of High Speed Rail and Northern Powerhouse Rail.

7 Transport Assessments and Travel Plans

All major development proposals that are likely to generate significant movements will be accompanied by a Transport Assessment and a Travel Plan in line with Council guidance which will address the following requirements:

- a *That the proposed development will not result in an unacceptable impact on safety;*
- b *That trips generated by the development can adequately be served by Warrington's Transport Network, including the Strategic Road Network;*
- c *Identify where there are any significant effects on Warrington's Transport Network and/or the environment and ensure that appropriate mitigation measures including the required infrastructure are identified and in place before the development is brought into use;*

- d Show how the Transport Assessment and associated Travel Plan have demonstrated how the proposed development will link into and enhance existing walking, cycling or public transport infrastructure;*
- e Commit to the implementation of a series of measures and initiatives to facilitate and encourage the use of sustainable travel (walking, cycling or public transport use); and*
- f Developments will be required to monitor the effectiveness of the travel plan and the traffic generated by that development and share this data with the Local Authority, on an agreed annual basis."*

2.2.14 The various aspects of this policy are considered throughout this appraisal and are referenced, where appropriate, in Sections 4.0 – 6.0.

Warrington Fourth Local Transport Plan

2.2.15 This document sets out the Fourth Local Transport Plan (LTP) strategy for the period until 2040. The vision and objectives of the plan are as follows:

"Vision

Warrington will be a thriving, attractive and well-connected place with popular, high quality walking, cycling, and public transport networks supporting our carbon-neutral future"

And

"Objectives-through LTP4 we will:

- 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 both exhaust and non-exhaust 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."***

2.2.16 The plan includes seven themes related to different aspects of transport and these are considered in this report: Active Travel, Public Transport, Smarter Choices and Cleaner Fuels (Section 4.0 – Sustainability and Accessibility); Safety and Security (Section 5.0 – Access); and Network Management (Section 6.0 – Traffic Impacts).

2.3 2019 Proposed Submission Version Local Plan

2.3.1 The SWUE was included as a draft allocation in the 2019 PSVLP via Policy MD3. The supporting text to the (then) draft allocation noted that land to the north of the A56 at Higher Walton will be developed as a sustainable urban extension to the main urban area of Warrington. The illustrative concept plan, Figure 10.3 of the PSVLP, also showed residential development to the south of A56.

2.3.2 The PSVLP noted the SWUE could provide around 1,600 new homes albeit masterplanning by the consortium identifies that around 1,780 dwellings could be provided across the site. The supporting text noted that the new community will be supported by a new primary school, a local centre including local shops and a health facility and extensive areas of open space and recreation provision.

2.3.3 The PSVLP stated that the development will be designed to support walking and cycling for local trips and that it will benefit from the WWL and improved public transport to enable access to the town centre, Stockton Heath, the Waterfront development and other major employment areas including Daresbury. Regarding the WWL, the PSVLP noted:

“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.”

2.3.4 Policy MD3 included details of key land use and infrastructure requirements (MD3.1), delivery and phasing (MD3.2) and detailed site specific requirements (MD3.3).

2.3.5 Part MD3.1 included:-

“2. The allocation will deliver a new residential community of around 1,600 homes, supported by the following range of infrastructure:

g. A comprehensive package of transport improvements.

j. A contribution towards strategic transport infrastructure.”

2.3.6 In terms of delivery and phasing, Part MD3.2 included:-

“3. The Council will require the preparation of a masterplan for the urban extension together with a delivery strategy and phasing plan in order to ensure comprehensive and coordinated development.

4. The masterplan must confirm to the requirements of this policy and be subject to consultation with statutory consultees and the local community.

5. The masterplan must be informed by a.....Transport Assessment.

6. The masterplan will provide the basis for subsequent planning applications for individual phases of development.

7. No development will be permitted until funding has been secured and a programme of delivery has been confirmed for the Western Link.

8. Full details of the programme and funding for delivery of the primary school, health centre, Local Park and other necessary infrastructure will need to be agreed by the Council before the first phase of the development is permitted to come forward.”

2.3.7 Part MD3.3 of the policy includes detailed site-specific requirements with respect to transport and accessibility:

Transport and Accessibility

33. A comprehensive package of transport improvements will be required to support the urban extension. Required improvements will include:

a. Ensuring appropriate access arrangements for the site as a whole and for individual phases of development.

b. Improved cycling and walking routes well related to the green infrastructure network; connecting to the enhanced country park on the Waterfront; the Walton Hall Estate; Stockton Heath; and Warrington Town Centre.

c. Providing public transport enhancements to connect the new community with Stockton Heath; Warrington Town Centre; the Waterfront Development. The new Garden Suburb; and other major employment areas, including Daresbury.

d. Other necessary network improvements as identified by an appropriate Transport Assessment.

34. The development will be expected to make a proportionate contribution towards the delivery of the Western Link Road.

35. The layout of the urban extension should maximise the potential for walkable neighbourhoods, with legible hierarchy of routes, providing new footpaths and cycleways that link to existing networks beyond the site.

36. Good accessibility to public transport services should be provided by ensuring that the bus routes and bus stops within the site are accessible by pedestrians and cyclists via effective footpaths and cycle routes.

37. The development should contribute to the Council's wider aspiration of enhancing the Bridgewater Canal as a recreational, tourism, heritage and environmental resource and for the Canal's tow path to provide a cycle and pedestrian link across the borough."

2.3.8 These detailed site specific matters are considered throughout the remainder of this report which also summarises the Council's current position in relation to the SWUE and traffic impacts on the WWL, demonstrating that any concerns are unfounded.

2.4 Warrington Western Link

2.4.1 The WWL is proposed to run to the south and west of Warrington town centre between A56 Chester Road and A57 Sankey Way. The preferred route of the scheme (the Revised Red Route, taken from the OBC) is included in Appendix A. It is understood that the Council is preparing a planning application for the WWL and this may change some of the details of the above albeit remains as a route connecting A56 with A57. Some details of the revised scheme are available and these are referenced where appropriate. The scheme includes (starting from its southern end):-

- A large traffic signal controlled roundabout junction with A56 Chester Road.
- A high-level crossing of the Manchester Ship Canal.
- A road under the West Coast Mainline railway and Walton Viaduct.
- Provision of junctions along the WWL potentially providing connections to the north and south for development at Warrington Waterfront.
- A bridge over the River Mersey, adjacent to the existing crossing at Forrest Way.
- Bridges over the Fiddler's Ferry railway line, Sankey Brook, Liverpool Road and the St Helens Canal.
- A large traffic signal controlled cross-roads junction with A57 Sankey Way and Cromwell Avenue.

2.4.2 The Council submitted an Outline Business Case (OBC) to the Department for Transport in December 2017 as a bid for construction funding via the DfT's Large Local Major Schemes programme. The bid document identifies a total cost of c.£213 million with a 33% local authority

contribution. The OBC identifies that the scheme has a Benefit Cost Ratio (BCR) of 2.24, indicating that the scheme represents high value for money. DfT conditional funding for the WWL was confirmed in April 2019, providing around two-thirds of the scheme's cost, and this offer was accepted by the Council's Cabinet in July 2019.

2.4.3 The Council's website includes an indicative timeline for the delivery of the scheme:

Table 2.2 Western Link Indicative Delivery Programme

Milestone	Date
Submission of planning application	Late 2021
Planning decision	Early 2022
Outcome of Public Inquiry	Mid 2022
Full Business Case submission	Late 2022
Start of construction	Early 2023
Project close out and evaluation	Mid 2026 to mid 2027

2.4.4 Peel supports the principle of the delivery of the Western Link. It does consider that any policy wording related to the main development areas should allow for both the planning of the sites in advance of the WWL and the provision of alternative transport infrastructure should this be necessary and to facilitate the delivery of development in advance of the WWL if the delivery of the scheme is delayed.

SECTION 3 Development Proposals

3.1 Site Location

3.1.1 The SWUE site lies to the immediate south west of the settlement boundary of Warrington. It is bound by the Manchester Ship Canal to the north and the West Coast Railway to the north west. To the south east, the A56 Runcorn Road forms the boundary, with a plot of land to the south of the A56, immediately adjoining the Warrington settlement boundary, included. The Bridgewater Canal encloses the site at its southern boundary. At the eastern extent, the boundary follows Bellhouse Lane and Runcorn Road. The location of the site is shown on Appendix B.

3.1.2 The site currently comprises a mix of agricultural land and associated buildings and property. Mill Lane runs through the site, providing access to a number of private properties and farm buildings. An area of industrial uses lies on the northern side of the Ship Canal, known as Warrington Waterfront. The route of the proposed Western Link Road lies at the eastern end of the site.

3.2 Consortium Masterplan

3.2.1 Land at Higher Walton will be developed as a sustainable urban extension to the main urban area of Warrington, providing around 1,780 new homes. The urban extension will support a new community in a high quality residential setting with ease of access to Warrington's employment, recreation and cultural facilities. The emerging masterplan for the SWUE is included in Appendix C.

3.2.2 The new community will be supported by:

- a new primary school
- a local centre comprising local shops, a potential new health facility (subject to needs) and other community facilities as necessary to support the new residential community.
- extensive areas of open space and recreation provision.

3.2.3 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, and other major employment areas, including Daresbury.

- 3.2.4 Development will ensure that important ecological assets within the site are preserved with opportunities to provide additional habitats and enhance biodiversity. The urban extension will preserve, and where possible enhance the heritage assets within the site and will be designed to respect the setting of nearby heritage assets, including the Bridgewater Canal and its bridges and the Walton Village Conservation Area.
- 3.2.5 Development is not expected to come forward until the funding and the programme for the delivery of the Western Link, or an alternative means of achieving any transport improvements needed to accommodate the development, have been confirmed.
- 3.2.6 Community infrastructure will need to be phased according to the requirements of the development.
- 3.2.7 The masterplan prepared by the consortium has evolved as the route of the WWL has been confirmed. This crosses the site at its eastern end as indicated on the masterplan. The masterplan has therefore made provision for the WWL but access is to be provided off the existing highway network such that development can progress in advance of the delivery of the new road. This is considered further in Section 6.0.
- 3.2.8 Access to the site is considered in detail in Section 5.0 below but five highways access points are proposed:-
- i Off A56 Chester Road at the location where Mill Lane joins the main road.
 - ii Off Runcorn Road located approximately half-way between its junctions with Mill Lane and Underbridge Lane.
 - iii An access off A56 Chester Road serving the parcel of residential development located to the south of Chester Road.
 - iv Off Runcorn Road to the west of Cockfight Cottages.
 - v Off Runcorn Road to the east of Bellhouse Lane.
- 3.2.9 The design and layout of transport corridors within the site and the connections off it will focus on creating places and high quality connections between the mixed uses on the site. Street and place design will start with pedestrians and cyclists having priority with managed car access.
-

Street design will follow the principles of Manual for Streets, 'Living Streets' and modern design guidance such as Local Transport Note 1/20 'Cycle Infrastructure Design'; this will result in streets that are destinations worth visiting. Shared surfaces within the site will be encouraged and the footpaths to the primary school will follow 'Safe Routes to School' principles. Speed limits will be low with an appropriate street hierarchy developed, making it the norm to travel slowly within the site. The site will be designed for the mobility impaired with account taken of 'Inclusive Mobility' requirements.

- 3.2.10** Thus the design philosophy of the masterplan will encourage local trip making and the use of sustainable travel modes, contributing to the site forming sustainable development in the context of the NPPF.

SECTION 4 Sustainability and Accessibility

4.1 Overview

4.1.1 The proposed development site is located close to the built area of Warrington, including the town centre and Stockton Heath, and close to existing transport networks. The Council confirmed in the 2019 PSVLP that the site's location will ensure good access to Stockton Heath district centre, the town centre, the major development area at Warrington Waterfront and other major existing and proposed employment areas, including Daresbury.

4.1.2 The transport strategy for the site will therefore focus on promoting sustainable travel modes and reducing car use, particularly that for single occupancy travel. Within this context, the travel and transport strategy for the site is to:

- i Take advantage of the site's existing locational characteristics close to key destinations including Warrington town centre and Stockton Heath;
- ii Maximise opportunities for walking and cycling trips, particularly over shorter distances, and taking account of the facilities to be provided on the site;
- iii Encourage external trips to/from the site to be made on foot, by bike, by public transport or through shared transport (e.g. a Car Club);
- iv Encourage commuting trips to Warrington and Daresbury to be made by bus; and
- v Where absolutely necessary, mitigate the impacts of residual car borne trips by the introduction of highways mitigation improvements.

4.1.3 As well as achieving modal shift, the travel strategy for the site will assist in creating a coherent new community and will reduce the vehicular traffic flows generated by the development and, as a result, emissions. The site will provide a range of benefits with specific sustainable transport benefits of the proposals including:-

- Everyday facilities located close to the development in walkable neighbourhoods, thus putting place first, enhancing inclusion, promoting sustainable lifestyle choices and behavioural change.
- Viable bus services and high quality bus infrastructure connecting the site with key destinations.

- Specific and targeted travel plan measures again designed to promote sustainable travel modes.
- Provision of on-plot and on-street electric vehicle charging points and an electric vehicle car club to encourage some vehicular journeys to be made by low emission vehicles.

4.1.4 Outline strategies for encouraging walking/cycling, public transport and the Travel Plan are included below. The accessibility of the SWUE is then considered.

4.2 Walk/Cycle Strategy

4.2.1 The site lies south of the existing built development within Warrington and close to the town centre and Stockton Heath. The site will connect with existing footways.

4.2.2 A footway/cycleway runs along the Chester Road site frontage, connecting with footways running to and from Warrington town centre. Opposite the site, an on-carriageway cycleway runs along Chester Road separated from car traffic by hatching, with this continuing to Old Chester Road. Footpath 4 runs along the northern side of the Bridgewater Canal through the site with this connecting with lightly trafficked streets to the east of Chester Road, these providing access on foot to Stockton Heath as well as to Walton Hall and Gardens. The route along the canal will largely provide for leisure and recreational walking trips.

4.2.3 Improvements to the pedestrian/cyclist environment will be investigated further and, where appropriate, implemented in line with the development coming forward. At this stage it is envisaged these could include:-

- a Improvements to the PRow that run across the site and their connections to the external street network. Such improvements could include widening, better surfacing / drainage, signing and lighting.
- b High quality pedestrian and cycle routes from the site to Warrington town centre and Stockton Heath.
- c Provision of widened footways along the Chester Road and Runcorn Road site frontage.
- d Provision of appropriate contributions to the Council's wider aspirations of enhancing the Bridgewater Canal including the use of the tow-paths as a walking and cycling route.

4.2.4 The above will be complemented by measures included in the Travel Plan for the site. The location of the site, proximity to many every-day facilities and the short-distances involved

affords a real opportunity to focus movement on slow/active modes of travel and thereby reduce car use.

4.3 Public Transport Strategy

4.3.1 Existing bus routes run along the Chester Road site frontage and through the site along Runcorn Road as shown on Appendix D. Note that some of the bus service frequencies are lower than pre-pandemic and the existing provision may reflect the short-term impacts of the pandemic. The bus services are summarised in the table below.

Table 4.1: Existing Bus Routes and Services

Service No.	Route	Frequency (Mins)					
		Monday – Friday		Saturday		Sunday	
		Daytime	Evening	Daytime	Evening	Daytime	Evening
62	Warrington – Stockton Heath – Murdishaw Runcorn – Widnes – Ditton	60 mins	-	-	-	-	-
62	Warrington – Stockton Heath _Murdishaw Runcorn – Widnes	-	-	4 services	-	-	-
X30	Warrington – Daresbury – Frodsham – Chester	60 mins	-	60 mins	-	-	-

4.3.2 The 62 bus service runs through the site along Runcorn Road, providing hourly frequency services to and from a range of destinations including Warrington Interchange, Warrington town centre, Stockton Heath, Runcorn Bus station, Runcorn High Street and shopping centre, Widnes and Ditton. The X30 runs between Chester and Warrington at an hourly frequency during the day, also calling at Daresbury, Palace Fields Halton Hospital and Frodsham.

4.3.3 Both the 62 and X30 run to Warrington Interchange where there are connections to a range of other bus services in Warrington and the nearby Warrington Central station provides national rail services.

4.3.4 The existing bus routes provide a reasonable level of service and the dwellings and other uses on the site will be within walking distance of existing bus services. The size of the site is such

that it can, if necessary and subject to detailed evaluation, support improved bus services, providing enhanced connectivity. The development could provide a 'pump-priming' subsidy to cover any initial short-fall between additional bus operating costs and the revenues generated along the new/improved routes, the latter from both the dwellings on the site and increased 'background' patronage and revenues. It is expected the full development will support additional bus services in due course, provided commercially by bus operators and with revenues off-setting operating costs.

4.3.5 There are several options available to improve bus provision which could be developed as the proposals are progressed, housing delivery rates are established and travel patterns are monitored. These could include:-

- i Increasing the frequency of existing bus service 62 between the site and Warrington and potentially serving Daresbury in the peak periods.
- ii Extending the operating hours of the 62 to provide evening services between the site and Warrington town centre and Interchange.
- iii As an alternative to i) and ii), developing a bespoke new bus service from the site to Stockton Heath and Warrington town centre/Interchange.
- iv Diversions of the existing 62 service through the site but with consideration of existing use of this service from Higher Walton.
- v Providing a bus service to secondary schools to cater for peak period school travel.

4.3.6 In practice bus provision will be phased and be responsive to both development completions and actual bus usage, the latter monitored by the bus operator(s) and the Travel Plan Co-ordinator (see below). A package of funded bus improvements can, if necessary, be agreed with WBC and subject to the viability of the site.

4.3.7 Given the size of the site and timescales over which development will be phased, then the delivery of specific proposals need not be identified in detail at this stage. However, it is considered that it will be possible to deliver viable improved bus services bringing benefits to the site.

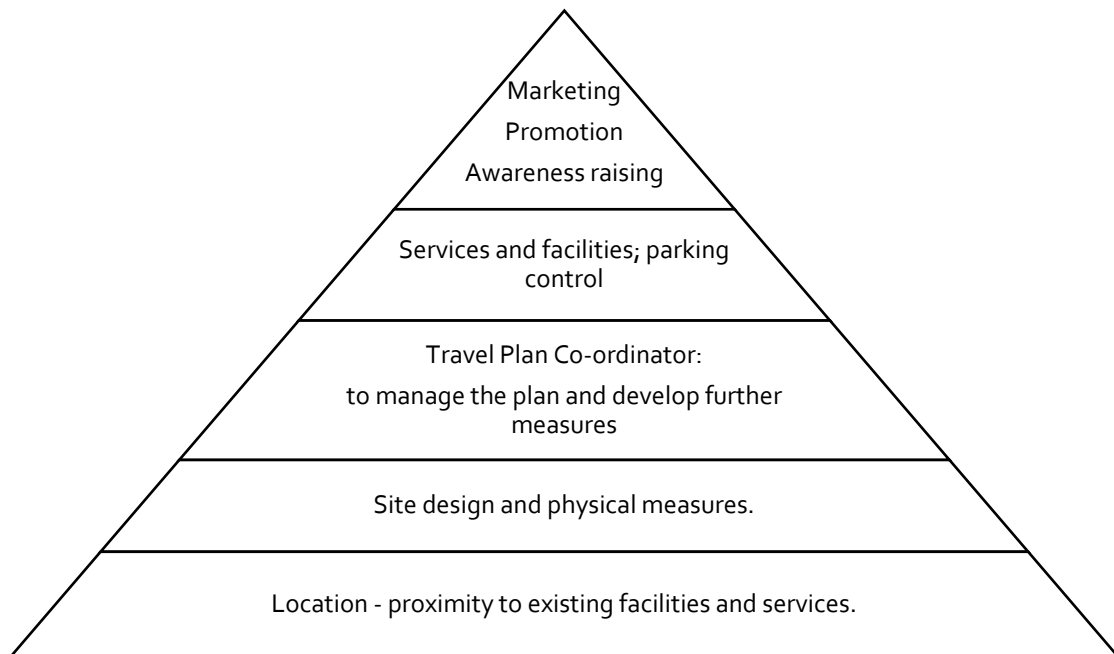
4.3.8 It is therefore proposed that, if the site is allocated in the Local Plan, further liaison is undertaken with the Council with the aim of establishing a framework for the provision of bus services and a mechanism to fund such services.

-
- 4.3.9 The 'framework' (effectively a service specification) will include details of destinations to be served, operating times (first and last buses by day of the week), service frequencies/headways (again by day of the week and time of the day), size and quality (e.g. age) of the buses to be used along the routes.
- 4.3.10 The 'mechanism' will include details of the costs of bus services, how fare revenues will be collected and allocated to the site, how background revenues will be identified and allocated to the services and how any revenues in excess of costs will be apportioned, noting that whilst some 'pump-priming' subsidy may be needed in the short-term, with the full development then it is anticipated that revenues will exceed costs. The mechanism will need to determine (through liaison with the Council and potentially 'Warrington's Own Buses' and Halton Transport) whether bus services are provided solely by the developer(s) or whether funds are paid by the developer to an appropriate collecting authority who will provide and deliver the bus services. The latter will allow better co-ordination and potentially economies of scale.
- 4.3.11 As well as bus routes and services, other measures can be implemented to encourage and promote bus use. These will include high quality bus stops and shelters located within and/or close to the site, timetable information and ticketing promotions which can be identified in the service framework set out above.
- 4.3.12 Further measures to promote bus (and rail) use can be delivered as part of the Travel Plan. In conclusion, the size of the site is such that it could support new or enhanced existing bus services ensuring the site is accessible by bus and is sustainable, in line with the NPPF and Local Policy aspirations.

4.4 **Promoting Sustainable Travel Choices**

- 4.4.1 As well as the physical measures to promote walking, cycling and public transport set out above, the development of the site will include the production of a comprehensive travel plan to support the proposals. This will primarily identify the delivery of 'soft' measures to encourage the use of sustainable modes, to complement the physical measures, mix of uses and high quality design approach.

- 4.4.2 The DfT document 'Making residential travel plans work: guidelines for new development' notes that the travel plan can be viewed as a pyramid of measures and actions and this approach will be adopted for the Travel Plan at the SWUE:



- 4.4.3 At the base of the pyramid is the location of the site. The proposals will include a primary school and local centre incorporating a range of retail, health and community facilities. There is a range of other facilities and services available close to the site and at Stockton Heath including health, retail and leisure uses. The location of the site itself will therefore encourage active travel.
- 4.4.4 The DfT note that the next stage should include the fundamental characteristics that need to be incorporated into the design of the site to support the use of sustainable modes. The design approach will focus on creating a sense of place, integrating the site with the existing community and promoting sustainable travel making, particularly active travel within the site.
- 4.4.5 The next tier is the Travel Plan Co-ordinator who will develop and manage the travel plan process, be responsible for the delivery of the plan and liaison with the Council, organise monitoring and reviews of the plan and ensure that travel plan targets are achieved.
- 4.4.6 The next level is the services and facilities that will be delivered at the site such as the range of measures outlined below.

- 4.4.7 The final top tier is the promotion and marketing of the travel plan and services, raising awareness of the plan through various information initiatives and delivered by the travel plan co-ordinator.
- 4.4.8 The detailed objectives and targets for the travel plan will be discussed and agreed with the Council and other key stakeholders, at the appropriate time. Broad objectives can include:
- i Bring together the design of the site and travel plan measures such that the need to travel is reduced.
 - ii Provide measures and initiatives that are inclusive, promote cohesion and provide alternatives for all residents and other users on the site.
 - iii Promote 'hard' and 'soft' measures such that sustainable modes are the first mode(s) of choice, rather than the car.
 - iv Minimise the traffic generated by the development proposals.
 - v Assist in developing a sense of place within the site.
 - vi Promote healthy lifestyle choices through the use of non-car modes with emphasis on active travel.
- 4.4.9 Specific SMART targets will be developed for the Travel Plan focusing on two key aspects:
- First, meeting modal share targets and a maximum proportion of car driver trips; and
 - Secondly, ensuring that the actual traffic flows generated by the site are consistent with those adopted in future transport assessments, such that there is no severe impact from additional car trips.
- 4.4.10 Formal monitoring arrangements can be agreed with WBC to assess the achievement of objectives and targets on an on-going basis.
- 4.4.11 Detailed assessment and evaluation will be undertaken to establish the most appropriate measures for the site when its allocation is confirmed. The size of the site is such that a comprehensive package of initiatives could be implemented to achieve objectives and targets. There will be general measures to be applied across the site and all modes, specific measures to promote walking and cycling and public transport, measures to reduce residual vehicular trips and information/awareness raising that can be rolled out across the whole site. The measures are summarised below.

Generic Measures

4.4.12 These will include:

- Travel Plan Co-ordinator: responsible for the overall delivery of the travel plan including liaison with WBC. They will monitor the plan against objectives and targets and identify measures to promote sustainable travel.
- Personalised travel planning: the TPC will liaise with individual householders to plan specific journeys and show how these can be undertaken by sustainable modes.
- Welcome Packs: these will be provided to every new household and will set out the benefits of travel plan measures, details of sustainable travel modes (e.g. bus maps), the initiatives available on the site and contact details for any further information.
- Broadband: all homes will be equipped with broadband, enabling working from home etc.

Measures to Promote Walking and Cycling

4.4.13 Measures to promote the use of active travel modes will include:

- Bicycle user group: the TPC will investigate the potential for a BUG to be established at the site to encourage residents to meet and exchange tips on cycle routes and maintenance. If possible, the TPC will forge links with cycle shops to arrange discounts on purchases and repairs.
- Travel voucher: a voucher could be offered to each new household (on first occupation) which can be used to purchase equipment or part purchase a bicycle, subject to viability considerations.
- Safe routes to school and walking bus: the main pedestrian routes on the site towards the primary school will be designed and audited using 'Safe Routes to School' principles with funding for the advertising of walking bus schemes and the provision of fluorescent vests for children and walking bus 'drivers'.

Measures to Promote Public Transport

4.4.14 Measures to promote the use of buses will include:

- Travel vouchers/travel cards/bus tickets: a monthly bus pass could be supplied to each household on first occupation. The TPC will seek to obtain discounts from bus operators for these tickets or tickets for extended periods, subject to viability considerations.
- Bus buddying: this is used in other towns where trained volunteers provide one-to-one support to older people, learning disabled people, people with physical and sensory impairments etc. to aid their understanding of using public transport and to help them gain confidence.

Reducing Car Use and Emissions

- 4.4.15 Residents will make some journeys by car but car sharing will be promoted from first occupation of the dwellings by the TPC. A bespoke car sharing scheme can be developed or existing car sharing initiatives can be used.
- 4.4.16 The proposed development may be of a sufficient size to sustain a viable Car Club. Car clubs provide their members with convenient access to newer, cleaner (low emission) vehicles without the expense of ownership. Car clubs also enable communities to share assets and can improve accessibility and support sustainable travel initiatives.
- 4.4.17 Electric car charging will be provided in the residential dwellings and at the proposed local centre facilities proposed on the site.

Information and Awareness

- 4.4.18 Raising awareness of the measures and initiatives that will be available at the site is important and therefore information will be provided as follows:-
- Site specific travel guide: a mobile app, setting out the details of bus services and walk and cycle routes, will be developed. Details will be included in sales literature and updated regularly by the TPC.
 - Website: a Travel Plan website will be developed for the site giving residents access to up-to-date travel information.
 - Notice boards: these will be located within sales offices and at points around the development, displaying up-to-date information on sustainable modes and setting out the benefits of these and other travel plan measures.

- Campaigns: the TPC will hold events and campaigns related to national and local initiatives such as 'Bike to Work' day and local organised cycle rides.

4.4.19 The TPC and travel plan measures will be funded by the developer and/or their successors in title.

4.4.20 The Travel Plan measures will thus encourage both active travel and the use of public transport, consistent with the NPPF and the transport related objectives and policies of the PSLP.

4.5 Accessibility of the Site

Overview

4.5.1 There are many facilities and services available close to the site and the site itself will include a primary school and a range of uses in the local centre. These on-site facilities will enhance the sustainability of the site, with the facilities providing for many day-to-day needs and allowing residents to make local and sustainable travel choices.

4.5.2 As a starting point for the consideration of the accessibility of the site, the TEMPRO database has been used to estimate the proportions of trips made by residents on the site for different journey purposes by all modes of travel. Data from MSOA25 has been used.

Table 4.2: TEMPRO Journey Purposes – SWUE

Journey Purpose	Proportion of All Trips ¹
Education	13.0%
Shopping	20.5%
Personal Business	9.2%
Recreation / Social	15.0%
Visiting Friends & Relatives	13.1%
Holiday / Day Trips	2.9%
Work	23.4%
Employer's Business	3.0%

¹Average weekday all modes

4.5.3 Thus trips are made for a variety of journey purposes, many associated with meeting day-to-day needs such as travel to school (c.13%), shopping (c.21%), personal business (c.9%), recreation and social (c.15%) and visiting friends and relatives (c.13%).

4.5.4 It is important to consider the trips likely to be made for each journey purpose with the availability of local facilities and services; this demonstrates that the site is sustainable and a suitable location for new development where trips can be made locally by sustainable travel modes.

4.5.5 Local facilities and services within the vicinity of the site are shown on Appendix E and the distance from the closest of the potential site accesses to the key destinations in the local area are set out in the table below:

Table 4.3 Distance to Key Facilities and Services

Use	Name	Distance
Primary Education	Primary School on-site	-
	Stockton Heath Primary School	1.7km
	Moore Primary School	1.9km
	St Thomas C of E Primary School	2.4km
	St Monica's Catholic Primary School	2.7km
	The Cobbs Infant School	2.9km
	Broomsfield Junior School	3.0km
Secondary Education	Bridgwater High School – Upper	2.6km
	Bridgwater High School – Lower	3.2km
	Priestley College	2.8km
Health	Local Centre on-site	-
	Stockton Heath Medical Centre	1.9km
	Causeway Medical Centre	2.7km
	Walton Road Dental Health	1.7km
	Jones Dental Care	1.8km
	Stockton Heath Dental Practice	2.0km
	Lloyds Pharmacy	1.9km
	Stockton Heath Pharmacy	1.9km
	Thomas Brown Pharmacy	2.0km
	Warrington A&E Hospital	4.9km
Retail & Leisure	Local centre on-site	-
	Stockton Heath Post Office	1.7km
	One Stop Ellesmere Road	0.9km
	Aldi Stockton Heath	1.8km
	M&S Simply Food Stockton Heath	1.9km
	Sainsbury's Local Stockton Heath	2.0km

Use	Name	Distance
	Morrisons	2.0km
	Warrington town centre	3.5km
	Stockton Heath Library	2.2km
	Warrington Library	3.1km
	Appleton Cricket Club	3.1km
	Walton Hall & Gardens	0.6km
	Walton Golf Course	1.0km
	Warrington Sports Club	1.2km
	Warrington Golf Club	3.2km
	Broomsfield Leisure Centre	2.6km
	Employment	Warrington town centre
Stockton Heath centre		2.0km
Centre Park Warrington		2.6km
Daresbury Park/Centre		2.8km
Blackheath Lane Distribution Park		3.6km

Accessibility to Education

- 4.5.6 Around 13% of daily trips will be for education. A primary school will be located on the site and will be within an easy walk of all the residential dwellings. There are primary schools within Stockton Heath within walking distance of the site. There are secondary schools c.2.5 – 3.0km distant, at the edge of walking distance. Given the size of the site there is an opportunity to provide school buses.
- 4.5.7 The location of the site in relation to the schools means that many trips can be made on foot. The IHT's document 'Providing for Journeys on Foot' suggests a walking distance to school of up to 2km. The distances between the residential areas and the schools varies (depending on the school) but the short distances facilitate easy trip making and data from the National Travel Survey (NTS) confirms there is a very good prospect of school trips being made locally or on the site. Information from the NTS demonstrates that trips to local schools are predominantly made on foot:-

Table 4.4 NTS Modal Split of Trips to School

Main Mode	Aged 5 – 10 Years			Aged 11 – 16 Years		
	Under 1 mile (1.6km)	1 to Under 2 Miles	All lengths	Under 1 mile (1.6km)	1 to Under 2 Miles	All lengths
Walk	80%	19%	46%	95%	53%	39%
Bicycle	1%	14%	1%	2%	6%	3%
Car/Van	18%	71%	47%	3%	28%	26%
Bus	1%-	5%	5%	1%	11%	29%
Other	-	1%	1%	-	1%	4%
Total	100%	100%	100%	100%	100%	100%

NTS Table 0614 for England 2019

Accessibility to Health Facilities

4.5.8 There is a medical centre at Stockton Heath within walking distance of the site and there is potential to include a GP facility within the local centre. There are three dental practices and three pharmacies within Stockton Heath, all within walking distance. Thus there is a very good prospect that trips to these locations will be made by active travel.

4.5.9 The main A & E hospital at Warrington is located at Lovely Lane, just north of the town centre. Residents on the site will be able to access this by bus to Warrington Interchange and then by either walking or using one of the frequent 16 group of bus services from the Interchange.

Accessibility to Retail and Leisure Facilities

4.5.10 As well as the retail uses at the local centre, there is a range of retail and leisure facilities within Stockton Heath, including a Post Office, food and non-food shops and library. These are all within walking distance. Warrington town centre has higher-order facilities and whilst these are outside walking distance, they can be accessed by bus. There are several sporting clubs at nearby Walton.

4.5.11 Thus a range of facilities will be available locally, encouraging active travel. The accessibility of the site to these facilities is concluded to be excellent.

4.5.12 Considering the national and local policies set out earlier in this report:

- Development at the site will facilitate the use of sustainable modes of transport, given the short-distances involved to many of the facilities and services and the availability of buses, existing and new – meeting the objectives of the Framework and UPSVLP Policy INF1.
- The need to travel can be minimised and use of sustainable modes can be maximised – meeting NPPF Para 105.
- Day-to-day activities and key facilities such as primary schools and local shops will be located within walking distance of properties – meeting NPPF Para 105 and UPSVLP Policy INF1.

4.5.13 The Council's Sustainability Appraisal Accessibility Objective includes criteria as follows, with a commentary given on how development at the SWUE meets each objective:

- ACC1: How accessible is the site to the nearest primary school on foot – school to be provided on the site and therefore located within a short walk. Therefore significant positive effects likely.
- ACC2: How accessible is the site to the nearest Secondary School – site within 3km of Bridgewater High School and Priestley College. Therefore positive effects likely.
- ACC3: How well served is the site by a bus service – existing bus services run through the site and along the site frontage. Using WBC's definition, these are low frequency but there is the potential to improve these as set out above. Therefore significant positive effects likely.
- ACC4: How accessible is the site to the nearest train station – the stations at Warrington Bank Quay and Warrington Central are c.3.5km and 3.7km distance from the site respectively albeit the latter is connected by bus. Therefore negative effects likely if WBC's definition is used. (See 4.5.14 below).
- ACC5: What is the overall distance to a GP service or health centre – GP practice located within walking distance in Stockton Heath with the potential to locate a facility on the site in the local centre. Therefore significant positive/positive effects likely.

4.5.14 Regarding ACC4 and the accessibility to the nearest train station, WBC's criteria is simply distance based and the rationale for this appears to be based on walking distances. Any site more than 3km from a railway station is scored as 'negative' using WBC's criteria. Whilst the railway stations in Warrington are outside the walking distance assumed by WBC, there are bus

services between the site and Warrington Central (Table 4.1) with the opportunity to improve these as a result of the scale of the development. The site is therefore well connected to the railway network and it is concluded that the accessibility of the site to train services is good, irrespective of WBC's walking distance based criteria.

4.5.15 In conclusion, a range of facilities and services will be available locally within walking and/or cycling distance. These include: primary and secondary schools, health facilities including doctors, dentist and pharmacy in Stockton Heath and shops and leisure facilities in Stockton Heath centre. Buses already travel through the site and along the site's Chester Road frontage. The bus strategy can provide enhanced connections to various destinations.

4.5.16 It is therefore concluded that there will be opportunities for modal shift and the site is sustainable and accessible via a range of travel modes. Development on the site will therefore be in accordance with the NPPF and WBC's local policies and objectives for the Local Plan.

SECTION 5 Site Access Arrangements

5.1 Overview

5.1.1 The site has a c.1.4km long frontage with A56 Chester Road. Runcorn Road runs in a broadly east-west direction through the site near its southern end, joining A56 at a traffic signal controlled junction. The Runcorn Road frontage through the site is also c.1.4km in length. Connections to the existing highway network are therefore readily achievable.

5.1.2 Access to the site will therefore be provided off both A56 Chester Road and Runcorn Road, with the phased delivery of the access arrangements determined as the phasing of land-uses across the site is finalised. It is, however, envisaged that development will start at both ends of the site, each served by a separate access. For the major part of the site north/west of A56, at this stage it is envisaged that a single access will be provided off Chester Road with three accesses off Runcorn Road, two roundabouts and a priority junction. The smaller parcel of land to the south/east of A56 will be served by a priority junction tying into the realigned A56 east of the junction with WWL. The access solutions shown below are indicative at this stage and the final designs / locations will be output from more detailed masterplanning. As such, the access proposals may change but the below confirms that access is deliverable and are a reasonable basis on which to assess the proposals.

5.2 Access Proposals

A56 Chester Road Accesses

5.2.1 A traffic signal controlled access junction to serve the land north/west of A56 has been designed in outline and is shown in Appendix F (drawing number ITM13243-GA-002). The access is located at Mill Lane but there is potential to vary the access location given the length of the site frontage. Mill Lane could be diverted to connect with the development access road.

5.2.2 The access proposal shows two ahead lanes on A56 and a right-turn lane from A56 north to the site. Separate left and right turning lanes are shown on the development access road. Facilities for pedestrians and cyclists are shown at the junction with the southbound on-carriageway cycle lane on Chester Road maintained.

- 5.2.3 A priority controlled 'T' junction could serve the parcel of land located south/east of A56, connecting into the re-aligned A56 where the connection to the 'walled garden' is shown on the WWL drawing.

Runcorn Road Accesses

- 5.2.4 A compact roundabout access off Runcorn Road is shown in Appendix G (drawing number ITM13243-GA-003). The junction is located approximately mid-way between Underbridge Lane and Mill Lane with the final position to be determined following topographical survey if an allocation is confirmed and proposals are agreed. The roundabout proposal could be amended to provide a fourth arm into the land south of Runcorn Road providing access to this parcel or alternatively the land south of Runcorn Road could be accessed via a priority 'T' junction located elsewhere along the site frontage.
- 5.2.5 Footway provision is shown along both sides of Runcorn Road with the tie-in to existing footways to be determined, taking account of the movement framework developed for the masterplan including through site, rather than along-road, connections towards Chester Road.
- 5.2.6 Additional accesses can be located on Runcorn Road to serve parcels of development at the western end of the site. Access options between Cockfight Cottages and Perch House Farm and between Perch House Farm and Bellhouse Lane are shown on the Curtins' drawings 75002-P01 and 75003-P01 respectively, also included in Appendix G.
- 5.2.7 The access junctions can be delivered independently with these responding to the phasing of the development. At an agreed point the junctions will be connected by an on-site 'spine-road' with development parcels served off this.
- 5.2.8 At the appropriate time, all access junctions will be subject to independent road safety audit.
- 5.2.9 Construction access will be provided off A56 Chester Road and Runcorn Road, depending upon phasing. Existing weight limits through Moore village and along Holly Hedge Lane will prevent inappropriate use by large construction vehicles but this will be reinforced by a Construction Management Plan.

5.3 Capacity of the Site Accesses

5.3.1 Traffic surveys have been undertaken to obtain traffic flow data to assess the capacity of the proposed access arrangements. Details of the surveys are given in Section 6.0. Peak hour traffic flows have been derived and converted to Passenger Car Units (PCU) for use in traffic capacity assessment. The peak hours are 07:45 – 08:45 and 16:00 – 17:00. The peak hour traffic flows on A56 Chester Road and Runcorn Road west of A56 are as follows:-

Table 5.1 Existing Peak Hour Traffic Flows

Location	AM Peak Hour			PM Peak Hour		
	Eastbound / Northbound	Westbound/ Southbound	Two-Way	Eastbound / Northbound	Westbound/ Southbound	Two-Way
A56 Chester Road	1,135	1,413	2,548	1,205	1,137	2,342
Runcorn Road	131	102	233	114	127	241

5.3.2 As part of previous representations to the Local Plan, forecast traffic flows considered growth to 2037 which was the end of the plan period. The derived Background traffic growth factors of c.8% were applied. The growth factors have been reviewed for the period 2017 to 2038 and are still c.8% and are marginally lower than those adopted previously with further detail provided in Section 6.0.. The traffic flows used in the junction assessments in the previous Local Plan representations therefore provide a robust assessment and are presented Section 6. The derivation of development generated traffic flows is summarised in Section 6.0. At this stage the access junctions have been assessed with 900 units off each of the site accesses at Runcorn Road and Chester Road north of A56.

5.3.3 The capacity of the potential site access junctions has been assessed with LINSIG (A56 Chester Road) and ARCADY (Runcorn Road). The capacity of the A56/Runcorn Road/Old Chester Road traffic signal junction has also been assessed (with LINSIG) as this provides access from the main road network to Runcorn Road.

5.3.4 The LINSIG results for the A56 Chester Road/site access junction are summarised in the table below:

Table 5.2 A56 Chester Road Site Access Capacity Assessment

Movement	AM Peak Hour		PM Peak Hour	
	DoS	MMQ	DoS	MMQ
A56 North Ahead	77.4%	8	66.3%	6
A56 North Right	23.3%	1	55.7%	3
A56 South Ahead & Left	61.0%	9	62.7%	9
A56 South Ahead	61.1%	10	61.4%	10
Site Access	37.6%	3	16.5%	1

DoS = Degree of Saturation MMQ = Mean Maximum Queue

- 5.3.5 The analysis demonstrates that the junction will operate satisfactorily and within capacity.
- 5.3.6 Pedestrian crossing provision is provided at the site access. The need for facilities for pedestrians to cross Chester Road will be assessed as the masterplan is developed, including its movement framework. It may be appropriate to provide stand-alone crossings remote from the junction.
- 5.3.7 The ARCADY results for the Runcorn Road site access roundabout are summarised in the table below:

Table 5.3 Runcorn Road Site Access Capacity Assessment Results

Arm	AM Peak Hour		PM Peak Hour	
	Max RFC	Max Queue	Max RFC	Max Queue
Runcorn Road East	0.17	0	0.30	0
Runcorn Road West	0.13	0	0.13	0
Site Access	0.26	0	0.11	0

RFC = Ratio of Flow to Capacity Max Q = maximum average queue

- 5.3.8 The junction is predicted to operate significantly below capacity with no significant queuing.
- 5.3.9 The results of the analysis of the A56/Runcorn Road/Old Chester Road traffic signals are set out in the table below. There are currently no controlled crossing facilities at the junction and the need for these to be provided as a result of the development will be assessed as the movement strategy for the masterplan is developed. It may be more appropriate to provide facilities remote from the junction. The modelling does not include pedestrian crossing provision at this stage.

Table 5.4 A56/Runcorn Road/ Old Chester Road Junction Capacity Assessment Results

Movement	AM Peak Hour		PM Peak Hour	
	DoS	MMQ	DoS	MMQ
A56 North Left & Ahead	64.5%	12	48.3%	7
A56 North Ahead	66.1%	13	50.7%	8
Old Chester Road	28.5%	1	29.4%	1
A56 South Left & Ahead	53.1%	8	61.3%	10
A56 South Ahead	54.6%	9	63.7%	12
Runcorn Road	65.0%	7	44.4%	3
A56 Internal Southbound Ahead	57.8%	13	40.7%	7
A56 Internal Southbound Ahead & Right	57.1%	14	61.9%	12
A56 Internal Northbound Ahead	49.7%	5	35.1%	0
A56 Internal Northbound Ahead & Right	45.9%	9	54.7%	11

DoS = Degree of Saturation MMQ = Mean Maximum Queue

- 5.3.10 The junction operates within capacity and can accommodate the traffic generated by the proposed development.

- 5.3.11 Traffic capacity assessments have not been conducted for the access points but the assumptions adopted, taking account of 900 units off each access tested and the application of traffic growth, show that all access junctions can be expected to operate satisfactorily.

- 5.3.12 All junctions are therefore predicted to operate satisfactorily and comfortably within capacity. It is therefore concluded that satisfactory access to the site is achievable and can be delivered, in conformity with paragraph 110 of the NPPF.

SECTION 6 Traffic Impacts

6.1 Overview

- 6.1.1 The impacts of the traffic flows generated by the SWUE on the wider highway network will need to be determined in detail, consistent with all major sites, and with the scope and methodology agreed with WBC if the site is allocated and development at the SWUE is brought forward.
- 6.1.2 The WWL will deliver significantly enhanced highway capacity in Warrington town centre, with this relieving existing congestion, providing access to development at Warrington Waterfront and freeing-up capacity to accommodate traffic flows generated by developments in the main urban area.
- 6.1.3 The Council undertook testing of the 2019 PSVLP which included the SWUE as well as all the other sites proposed for allocation at the time. That testing also took account of WWL and other infrastructure measures included in the PSVLP and Infrastructure Delivery Plan. This concluded that the (then) PSVLP development could be delivered. This is referenced below.
- 6.1.4 The Council has noted that the SWUE would have traffic impacts on the WWL. This has been addressed in separate submissions made by Peel with these concerns concluded to be unfounded. This is referenced where appropriate.
- 6.1.5 The potential to deliver development at the SWUE in the short-term is also considered, given the timescales associated with delivering the WWL.

6.2 Baseline Traffic Flows

- 6.2.1 Existing traffic flows have been derived from a comprehensive series of traffic surveys conducted in October 2017. These comprised turning count observations, queue length surveys and automatic traffic counters.
- 6.2.2 Turning flow and queue surveys were conducted at the following junctions on Thursday 17 October 2017:
- A56 Chester Road / Runcorn Road / Old Chester Road
 - A56 Chester Road / A5060 / Walton New Road

- A5060 Chester Road / Ellesmere Road
- A49 London Road / A56 Walton Road
- A49 London Road / Ellesmere Road
- A49 London Road / West Avenue
- A56 Walton New Road / Walton Heath Road
- A49 Wilderspool Causeway / A5060
- Runcorn Road / Keckwick Lane
- A56 Chester Road / A558 Daresbury Expressway
- M56 Junction 11.

6.2.3 The vehicular traffic flow data has been converted to PCU equivalents and the peak hours across the network local to the development identified; the peak hours are 07:45 – 08:45 in the morning and 16:00 – 17:00 in the evening. The resultant 2017 observed traffic flows are given in Appendix H.

6.2.4 Automatic traffic counter surveys were also conducted on A56 Chester Road and Runcorn Road. These have been used to confirm that the survey day for the junction turning counts was representative.

6.2.5 As outlined in Section 5, existing traffic flows have been growthed to future assessment years. For the consideration of the full development of around 1,780 dwellings then the end of plan period has been adopted. Any development to be delivered in advance of the WWL will be determined via a subsequent detailed transport assessment. Growth factors were derived for the previous Local Plan representations from TEMPRO to 2037 with land-use growth excluded. These growth factors have been reviewed using the latest TEMPRO NTM Dataset (RTF 2018 Scenario 1 Reference) the period between 2017 to 2038 and the resultant growth factors are compared in the table below:-

Table 6.1 Traffic Growth Factors

Peak Hour	Traffic Growth Factor	Traffic Growth Factor
	2017 to 2037	2017 to 2038
AM Peak Hour	1.0834	1.0816
PM Peak Hour	1.0776	1.0754

6.2.6 The updated growth factors are marginally lower than those adopted previously. Therefore the 2037 traffic flows have been retained and taken to represent 2038 traffic levels. The future baseline traffic flows for an forecast year are given in Appendix I.

6.3 Development Traffic Flows

Trip Generation

6.3.1 Trip generation rates for the proposed development have been derived from the TRICS database using the 'Houses Privately Owned' category for sites with at least 100 dwellings with a reduction of 20% to reflect:-

- The availability of a school and other facilities on the site resulting in reduced external trip making. School travel accounts for a significant proportion of peak hour trips and with schools within walking distance then travel by car is expected to be minimised. Similarly the other facilities on the site will reduce external trip making.
- The impacts of the bus strategy and travel plan, aimed at reducing car travel. Increased bus provision will offer a high quality alternative to car travel for many trips within the urban area. Studies of the impacts of Travel Plans indicate that these can reduce car travel by up to 10-15%, depending on the scale of measures introduced.
- Reductions in trip rates over time to reflect changes in demographics (e.g. reductions in household size) with this evidenced by both NTS and TRICS trip rates reducing over time; and
- The possible presence of affordable housing which has lower trip rates. Analysis of TRICS data indicates that peak hour trip rates for affordable housing are lower than for private housing.

6.3.2 The TRICS trip generation rates and the resultant generated traffic flows are shown in the table below for the morning and evening peak hours.

Table 6.2 SWUE – Trip Generation

Peak Hour	Direction	Trip Rate (per unit)	No. Trips
			1,780 units
AM Peak	Arrival	0.127	181
	Departure	0.377	537
	Total	0.504	718

Peak Hour	Direction	Trip Rate (per unit)	No. Trips
			1,780 units
PM Peak	Arrival	0.309	440
	Departure	0.164	234
	Total	0.473	674

6.3.3 Thus the full development could generate up to 670-720 vehicular trips in each of the peak hours.

6.3.4 TEMPRO has then been used to identify the potential journey purposes travelled by residents. Data has been used for Warrington MSOAs 023, 024 and 025 (broadly south of the ship canal, north of M56 and west of M6). The TEMPRO three hour peak period proportions have been adjusted to reflect the peak hours. The resultant journey purpose split is as follows:-

Table 6.3 SWUE – Journey Purposes of Car Travel

Trip Purpose	Proportion of Trips	
	AM Peak Hour	PM Peak Hour
Work	58%	43%
Employer's business	7%	6%
Education	20%	4%
Shopping	6%	16%
Personal business	4%	8%
Recreation/Social	2%	9%
Visiting friends/relatives	1%	10%
Holiday/day trips	2%	4%

6.3.5 Considering the above, there is clearly potential for some of the peak hour trips to be made locally and by active travel modes rather than by car e.g. to the primary school on the site or to the schools nearby and to the facilities and services within Stockton Heath. In the AM and PM peak hours, 35% and 51% of trips respectively are made for reasons other than journeys to work or on employer's business.

Trip Distribution and Assignment

6.3.6 The total generated trips (Table 6.2) have then been disaggregated by journey purpose (using Table 6.3) and the distribution of these considered as follows with details set out in Appendix J:-

- Work: using journey to work census data.
- Employer's business: distributed to the main towns and cities (e.g. 50% of trips are distributed to Warrington town centre).
- Education: distributed to primary and secondary schools within Warrington and Halton, with the schools nearest the site having the highest proportion of trips.
- Shopping: split 50/50 food and non-food (based on NTS) and then distributed to nearby supermarkets / shopping areas.
- Other purposes: distributed to the main towns and cities.

6.3.7 The traffic flows on the network local to the site generated by the development, including their disaggregation by journey purpose, are given in Appendix K for the full development.

6.3.8 Appendix L shows the development traffic across the wider highway network in and around Warrington. This identifies that traffic is spread around the highway network, reflecting the many destinations available. The traffic flows indicate the following overall distribution and assignment of traffic:-

- c.35 – 40% to the south along A56 towards Daresbury and M56.
- c.35 – 45% to the north towards Warrington town centre and beyond.
- c.15 – 20% to the east towards Stockton Heath and beyond.
- c.2 – 5% of trips made locally closer to the site.

6.4 Initial Phase of Development

6.4.1 The delivery timescales for the WWL indicate scheme opening in mid 2026 subject to satisfactory progression through the order-making and planning processes and final confirmation of funding by DfT.

6.4.2 Given the lead-in times for the delivery of the WWL, Peel considers that some development at the SWUE could potentially be released in advance of the opening of the WWL scheme, noting that certainty on the delivery of the WWL will be known much earlier of its opening.

6.4.3 To provide an initial indication of the scale of impacts of the SWUE, in advance of the WWL, development generated traffic flows derived at 6.3 above have been compared with Forecast Year baseline traffic flows from 6.2. For this comparison, and for illustrative purposes only, one-

quarter of the potential 1,780 units has been adopted. The resultant traffic flows at key junctions on the local road network close to the site are given in the table below:

Table 6.4: Proportional Traffic Impacts

Junction	AM Peak Hour			PM Peak Hour		
	Forecast Year Base Flow	Development Flow	Proportional Impact	Forecast Year Base Flow	Development Flow	Proportional Impact
A56 Chester Road / Runcorn Road	2,940	116	3.9%	2,514	114	4.5%
A56 Chester Road / A5060	2,873	110	3.8%	2,701	101	3.7%
A5060 / Ellesmere Road	2,545	73	2.9%	2,516	82	3.3%
A49 London Road / Walton Road	1,837	22	1.2%	1,669	14	0.8%
A49 / Ellesmere Road	1,717	4	0.2%	1,571	2	0.1%
A49 Wilderspool Causeway / A5060	4,182	67	1.6%	3,697	75	2.0%
Runcorn Road / Keckwick Lane	397	7	1.8%	336	5	1.5%
A56 Chester Road / A558	4,461	59	1.3%	3,987	62	1.6%
M56 Junction 11	4,455	43	1.0%	4,136	39	0.9%

6.4.4 The Guidelines for the Environmental Assessment of Road Traffic (GEART) state that the day-to-day variation of traffic on a road is frequently at least some + or – 10%. The above table demonstrates that the development generated traffic flows will be well within typical daily variations at all junctions on the road network surrounding the site. Impacts at these location are therefore unlikely to be discernible and the GEART notes that it should be assumed that projected changes in traffic of less than 10% create no discernible environmental impact.

6.4.5 The above indicates that there is the potential for the early delivery of housing development at the SWUE, subject to detailed transport assessments.

6.5 Longer Term Off-Site Traffic Impacts

Warrington Western Link

6.5.1 WBC's bid for DfT Large Local Major Schemes funding, set out in the Outline Business Case, notes:-

“Western Link seeks to address a range of transport issues within the town of Warrington including congestion at key junctions, town centre air quality and resilience at times of severe network stress.”

And

“Parallel to addressing Warrington’s transport problems, the wider objectives of Western Link seek to unlock critical development land south-west of the town centre and deliver access to the mixed-use Waterfront development. Western Link provides a vital opportunity in supporting the growth of Warrington’s housing supply and stimulating economic growth.”

6.5.2 One of the five key objectives of the WWL scheme is to unlock key development land.

6.5.3 Warrington Borough Council (WBC) now consider that the potential development site at the SWUE will adversely affect the capacity of the proposed Warrington Western Link (WWL) road. The Council's report to its Cabinet meeting of 13 September 2021 confirms that the SWUE is removed as an allocation and that it has concerns in relation to the impacts of the development on the WWL. The Council's concerns appear to be based on traffic modelling included in the evidence base supporting the 2021 UPSVLP.

6.5.4 Separate representations consider the technical analysis conducted on behalf of WBC and these demonstrate that the SWUE will not adversely affect the WWL. Specifically, the representations conclude:

- The trip generation forecasts adopted for by the Council for the PW development (a cumulative assessment was conducted by the Council) are too high and these result in greater impacts on the WWL terminal junctions than would otherwise be the case.
- Whilst suggested as an issue by the Council, there is no significant issue to address in terms of model convergence as the evidence base confirms the transport model did converge.

- There are options to improve the A56/WWL terminal junction which would be deliverable and viable. It is therefore concluded that, contrary to the Council's position, the development at the SWUE will not significantly impact on the WWL at this location.
- The additional traffic flows generated by several cumulative developments at the A57/WWL terminal junction have a modest impact and these are not severe within the meaning of the NPPF. It is concluded that any improvements which may be needed would likely be small-scale given the modest impacts.
- The Council's concerns related to development at the SWUE resulting in re-assignment back across the town centre are unfounded. This is based on the small increase in traffic across the town centre cordon of only c.3%, that the scenario assessed by the Council includes increased levels of development/traffic, that some of this traffic would be expected to cross the town centre cordon in any event and that increases in traffic flows on individual links will be within expected daily variations. The Council's evidence does not indicate a severe impact within the meaning of NPPF.

6.5.5 Thus it is concluded that the SWUE will not have adverse impacts on WWL and that the traffic flows generated by the SWUE can be accommodated on WWL including at its terminal junctions with A57 and A56.

Impacts on the Wider Highway Network

6.5.6 The 2019 PSVLP was issued for consultation in March 2019. SWUE was included as draft allocation MD3. The Council's report to their Executive Board of 11 March 2019, seeking approval of the 2019 PSVLP prior to consultation, described the process for developing the Local Plan and identifying draft allocations. This noted, that the Council carried out a fundamental review of the technical evidence base and options assessments that underpin the (then) emerging local plan.

6.5.7 The report notes that the (2019) PSVLP was prepared at the same time as the new Local Transport Plan ***"to ensure the transport implications are properly assessed and that the development proposed in the PSVLP supports the Council's aim of promoting sustainable transport modes"***. It goes on to note ***"This work has included testing the transport implications of the emerging Local Plan through the Council's Multi-Modal Transport Model"***.

- 6.5.8 The report confirmed that detailed work was undertaken to demonstrate that the Plan can be delivered including assessing the deliverability of infrastructure required to support Warrington's growth. The 2019 PSVLP states:

“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”.

- 6.5.9 The evidence base included testing the (then) emerging development strategy with the Warrington Multi-Modal Transport Model. This is reported in the above document produced by Aecom. This notes:

“As the PSVLP is expected to impose significant pressure on the transport network, it will be particularly important that soundly based evidence justifies the associated transport strategy, for the final consultation of the preferred spatial strategy prior to an Examination in Public (EiP).”

“The PSVLP sets out the Council’s favoured approach to delivering the housing and employment land necessary to meet its growth targets.”

“The WMMTM16 has been used to forecast the impact of this pattern of development growth on the transport network in Warrington.”

“The purpose of the testing is to ensure that the transport impacts of the development and associated highway interventions are deliverable, attractive to encourage mode change, whilst addressing existing known congestion issues. The model has been used to identify and assess the transport impacts of the PSVLP growth in Warrington.”

- 6.5.10 The 2019 Aecom testing identifies minor delay at the A57 and A56 junctions at either end of the WWL, demonstrating that the SWUE would not have an impact on these junctions. The work described above to address the Council's concerns related to impacts on the WWL confirms that the SWUE will have no severe impacts on WWL with the 2021 UPSVLP.

- 6.5.11 Traffic impacts across the wider highway network, beyond WWL, are reported in the 2019 and 2021 Aecom model testing. Based on the delays reported in the 2021 model testing and the traffic flows generated by the SWUE development, it is concluded that SWUE would not have adverse and severe impacts across the wider highway network that could not be properly assessed and considered at the appropriate time as any planning applications are progressed.

6.5.12 It is therefore concluded the SWUE, in accordance with the NPPF, should not be prevented on transport grounds as the residual cumulative impacts of development will not be severe.

6.6 **Conclusions**

6.6.1 Overall it is concluded that the traffic impacts of the SWUE will not be severe and the site is suitable for allocation in the Council's Local Plan.

SECTION 7 Conclusions

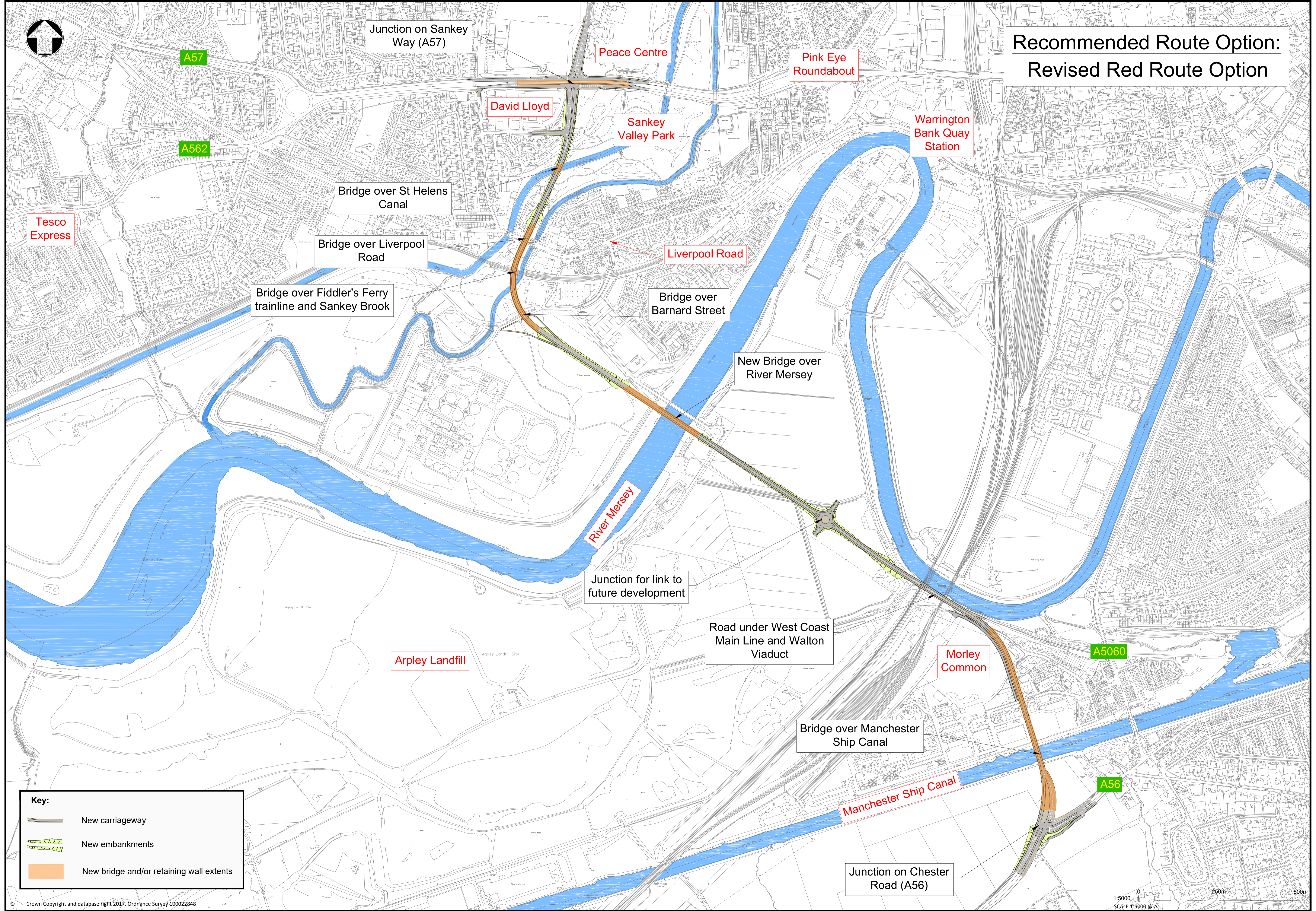
- 7.1.1 This report has considered the transport and highways implications of residential development at the South West Urban Extension. This is capable of accommodating around 1,780 residential dwellings with complementary supporting facilities.
- 7.1.2 The site will include a mix of uses, enabling local active travel, and is close to a comprehensive range of facilities and services at Stockton Heath and Warrington town centre. The site 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 UPSVLP. 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.
- 7.1.3 The development of the site will therefore fully accord with the NPPF objective related to sustainable travel, with many opportunities for such modes to be taken up.
- 7.1.4 Access to the site is proposed off Chester Road and Runcorn Road and feasibility level designs have been produced for the accesses and the capacity of these considered. The access arrangements will operate satisfactorily. Access to the site is deliverable and achievable. It is therefore also concluded that satisfactory access can be provided in accordance with the NPPF.
- 7.1.5 The Warrington Western Link is to be delivered by the Council, with DfT funding. The link is not expected to be opened until 2026. Peel considers that some development can be delivered in advance of the Western Link based on the minor proportional increases in existing traffic flows.
- 7.1.6 The Warrington Western Link will also provide significant additional capacity in the central Warrington road network and will assist in facilitating development proposals by accommodating the traffic generated by it. WBC consider that the SWUE will have adverse impacts on WWL but these claims have been addressed in separate representations and these concluded that the SWUE will not have severe impacts on WWL. The Council's rationale for not including the SWUE as a draft allocation on the basis of impacts on the WWL is unfounded.
- 7.1.7 In terms of off-site traffic impacts, WBC undertook traffic modelling to demonstrate that the traffic flows generated by the 2019 PSVLP development, including the SWUE, can be accommodated on the surrounding highway network. Considering the results of the 2021

UPSVLP transport model testing and the analysis to address the Council's concerns in relation to WWL, it is concluded that this position remains. The detail of any mitigation required to accommodate the SWUE generated traffic, beyond WWL, can be addressed in detail at the appropriate stage in the planning process.

- 7.1.8** It is therefore concluded that the residual cumulative traffic impacts of development at SWUE will not be severe and therefore, in accordance with NPPF, development should not be prevented on transport grounds.
- 7.1.9** 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.

APPENDIX A. Warrington Western Link

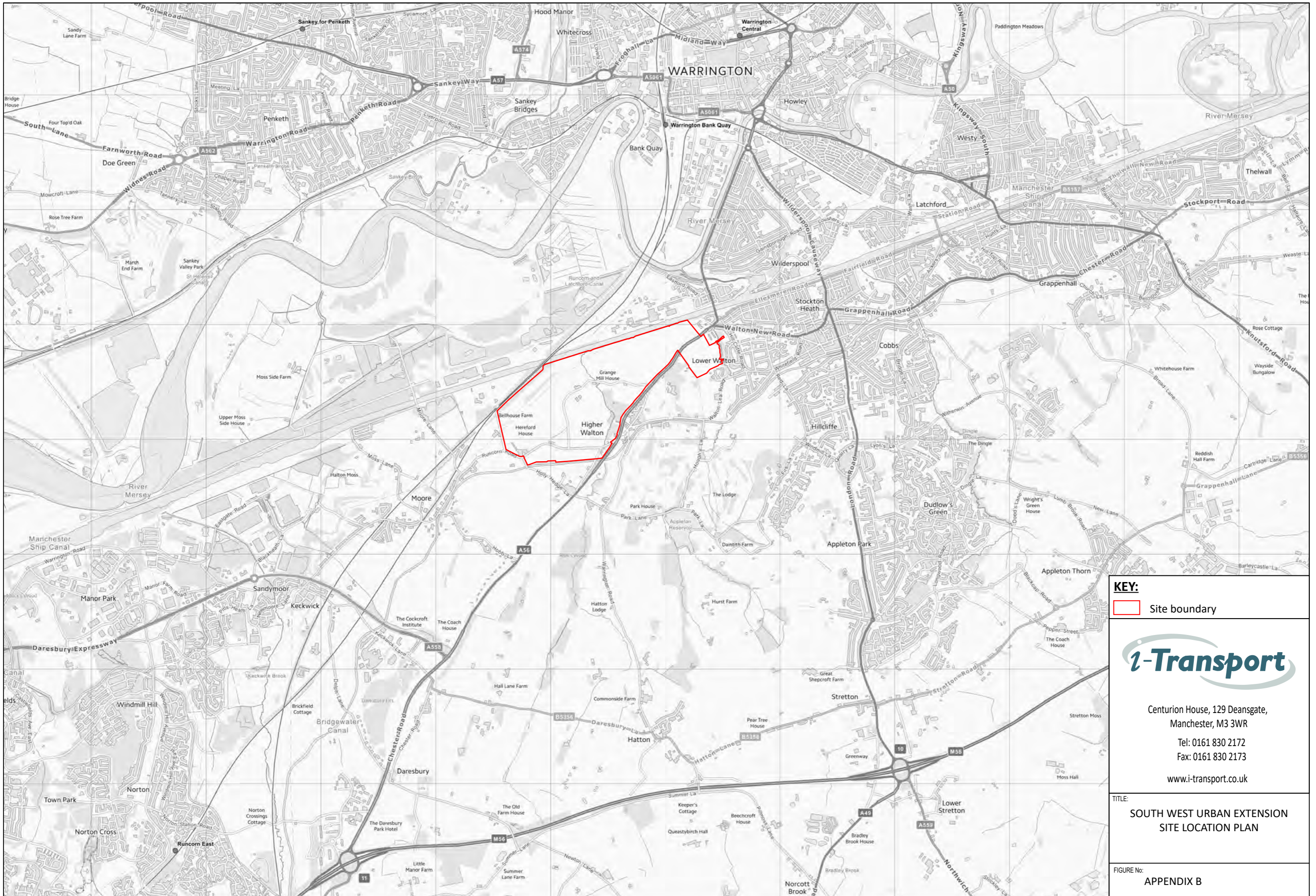
Recommended Route Option: Revised Red Route Option



Key:

- New carriageway
- New embankments
- New bridge and/or retaining wall extents

APPENDIX B. Site Location Plan



KEY:
 Site boundary

i-Transport

Centurion House, 129 Deansgate,
 Manchester, M3 3WR
 Tel: 0161 830 2172
 Fax: 0161 830 2173
www.i-transport.co.uk

TITLE:
**SOUTH WEST URBAN EXTENSION
 SITE LOCATION PLAN**

FIGURE No:
APPENDIX B

APPENDIX C. SWUE Masterplan

KEY:

-  Site boundary
-  Local Authority Boundary
-  Proposed Green Belt
-  Existing vegetation
-  Proposed trees and woodland
-  Proposed development cells
-  Proposed development to be no higher than 2 storey along A56
-  Potential locations for a school (A or B)
-  Proposed play area
-  Potential location for retail / local centre
-  Proposed primary road
-  Proposed secondary / tertiary roads
-  Proposed public open space
-  Proposed allotments
-  Existing Public Right of Way
-  Proposed footpath
-  Proposed cycleway with existing residential access retained
-  Proposed route of western link road
-  Gas pipeline and easement
-  Proposed vehicular access points

NB: Masterplan subject to change following detailed survey work






Warrington Local Plan Sites
South West Urban Extension
Illustrative Masterplan and
development constraints

Drwg No: 630DE-13M
Drawn by: AH
Rev by: SB (10.11.21)
QM Status: Checked
Scale: 1:10,000 @ A3

Date: 11.06.2018
Checker: SR
Rev checker: DL
Product Status:
Issue

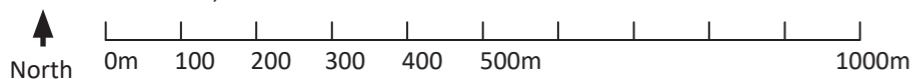


HSE Consultation Zones

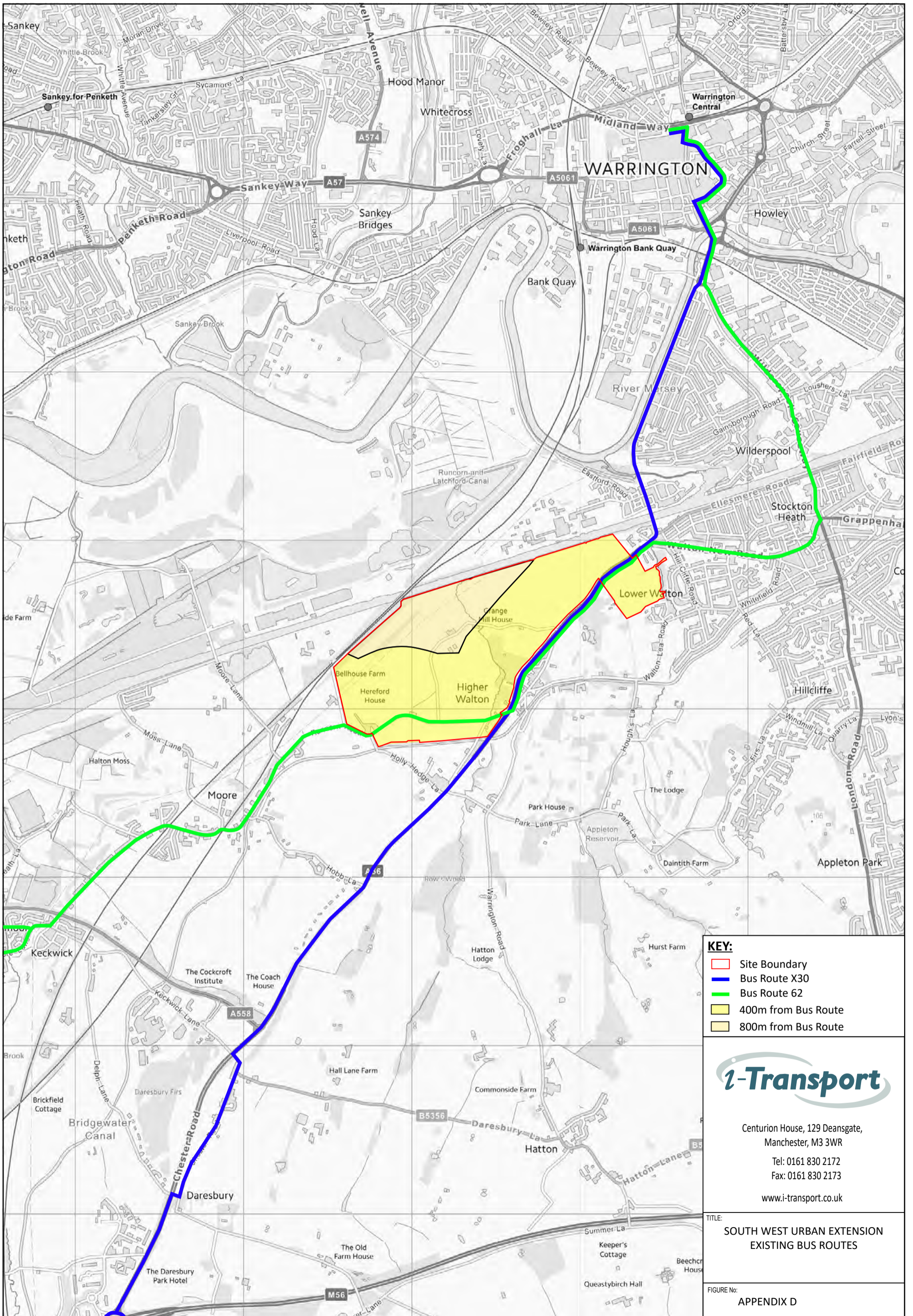
-  Inner Zone (50m)
-  Middle Zone (65m)
-  Outer Zone (100m)

• Total site area:	119.59 ha / 295.52 ac
• Total existing properties within red line:	6.37 ha / 15.74 ac
• Total existing roads within red line (A56/Runcorn Road):	1.80 ha / 4.45 ac
• Total proposed spine road corridor within red line (outside development cells):	2.74 ha / 6.77 ac
• Total proposed green infrastructure (all typologies):	55.82 ha / 137.93 ac
Land north of A56 and Runcorn Road:	
• Potential school (location to be confirmed):	1.40 ha / 3.46 ac
• Potential retail/local centre:	0.50 ha / 1.24 ac
• Residential development:	41.15 ha / 101.68 ac
- Residential development within Solvay Interlox Ltd outer zone:	13.50 ha / 33.36 ac (up to 473 units @ 35/ha)
- Residential development within Solvay Interlox Ltd middle zone:	0.86 ha / 2.13 ac (up to 30 units @ 35/ha)
- Residential development within former Norbert Dentressangle outer zone:	6.70 ha / 16.56 ac (up to 235 units @ 35/ha)
units @ 35 units per ha:	1440
Land south of Runcorn Road:	
• Residential development:	5.53 ha / 13.66 ac
units @ 35 units per ha:	194
Land south of A56 Chester Road:	
• Residential development:	4.28 ha / 10.57 ac
- Residential development within Solvay Interlox Ltd outer zone:	0.47 ha / 1.16 ac (up to 16 units @ 35/ha)
units @ 35 units per ha:	149
Total units across whole site @ 35 units per ha:	1783

Scale 1:10,000



APPENDIX D.Existing Bus Routes



- KEY:**
- Site Boundary
 - Bus Route X30
 - Bus Route 62
 - 400m from Bus Route
 - 800m from Bus Route

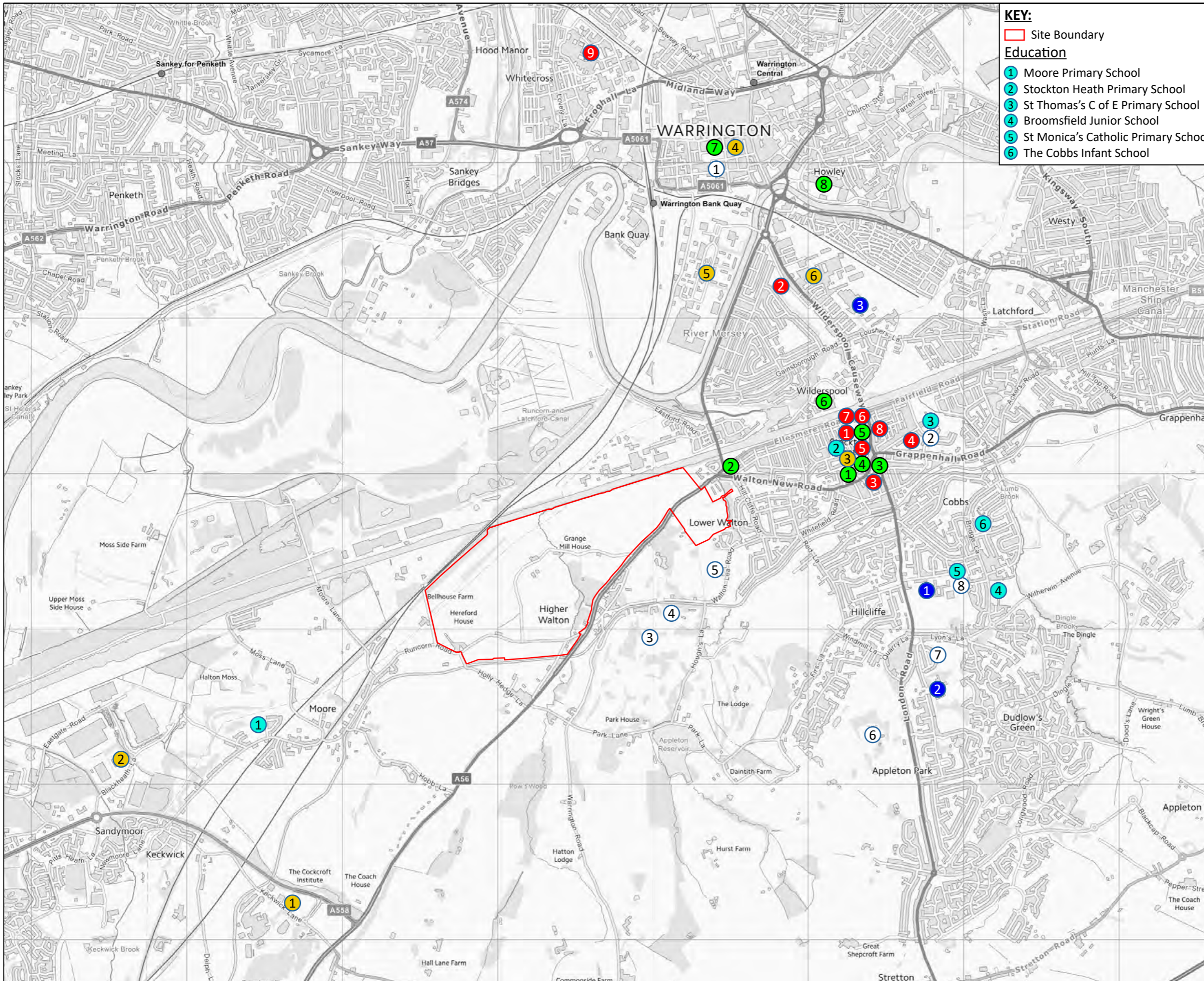


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TITLE:
**SOUTH WEST URBAN EXTENSION
 EXISTING BUS ROUTES**

FIGURE No:
APPENDIX D

APPENDIX E. Location of Key Facilities and Services



KEY:

Site Boundary

Education

- 1 Moore Primary School
- 2 Stockton Heath Primary School
- 3 St Thomas's C of E Primary School
- 4 Broomsfield Junior School
- 5 St Monica's Catholic Primary School
- 6 The Cobbs Infant School

- 1 Bridgewater High School - Upper
- 2 Bridgewater High School - Lower
- 3 Priestley College

Health

- 1 Stockton Heath Medical Centre
- 2 Causeway Medical Centre
- 3 Walton Road Dental Health
- 4 Stockton Heath Dental Practice
- 5 Jones Dental Care
- 6 Lloyds Pharmacy
- 7 Stockton Heath Pharmacy
- 8 Thomas Brown Pharmacy
- 9 Warrington and Halton Hospitals NHS Foundation Trust

Retail

- 1 Stockton Heath Post Office
- 2 One Stop Convenience Store
- 3 Sainsbury's Local
- 4 ALDI
- 5 M&S Simply Food
- 6 Morrisons
- 7 Warrington Town Centre
- 8 Riverside Retail Park

Leisure

- 1 Warrington Library
- 2 Stockton Heath Library
- 3 Walton Golf Course
- 4 Walton Hall & Gardens
- 5 Warrington Sports Club
- 6 Warrington Golf Club
- 7 Appleton Cricket Club
- 8 Broomfield Leisure Centre

Employment

- 1 Daresbury Science & Innovation Centre
- 2 Distribution Park off Blackheath Lane
- 3 Stockton Heath Centre
- 4 Warrington Town Centre
- 5 Centre Park Warrington
- 6 Causeway Park



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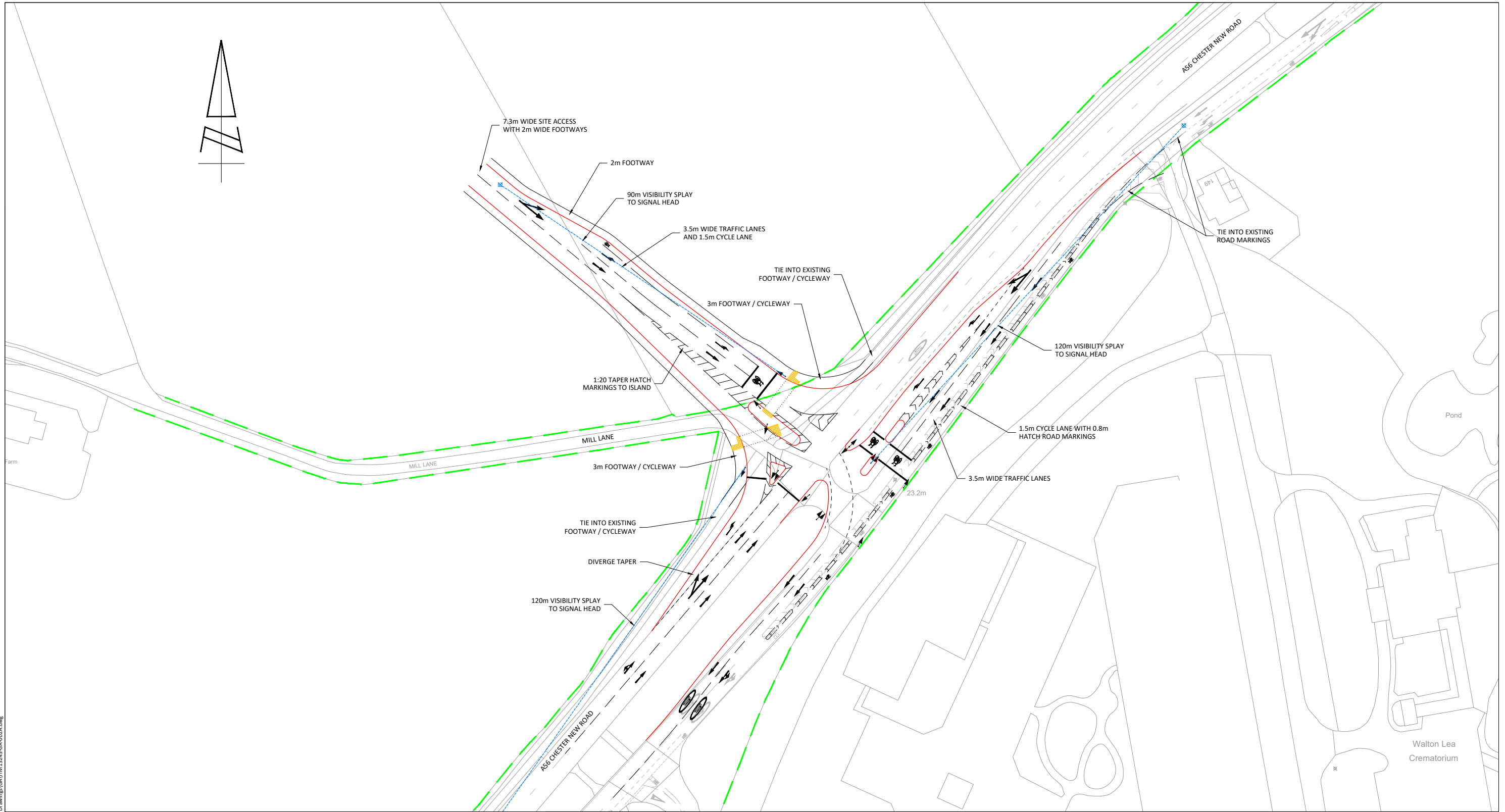
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Fax: 0161 830 2173

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TITLE:
**SOUTH WEST URBAN EXTENSION
EXISTING KEY FACILITIES AND SERVICES**

FIGURE No:
APPENDIX E

APPENDIX F. Potential Site Accesses off A56 Chester Road



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— HIGHWAY BOUNDARY

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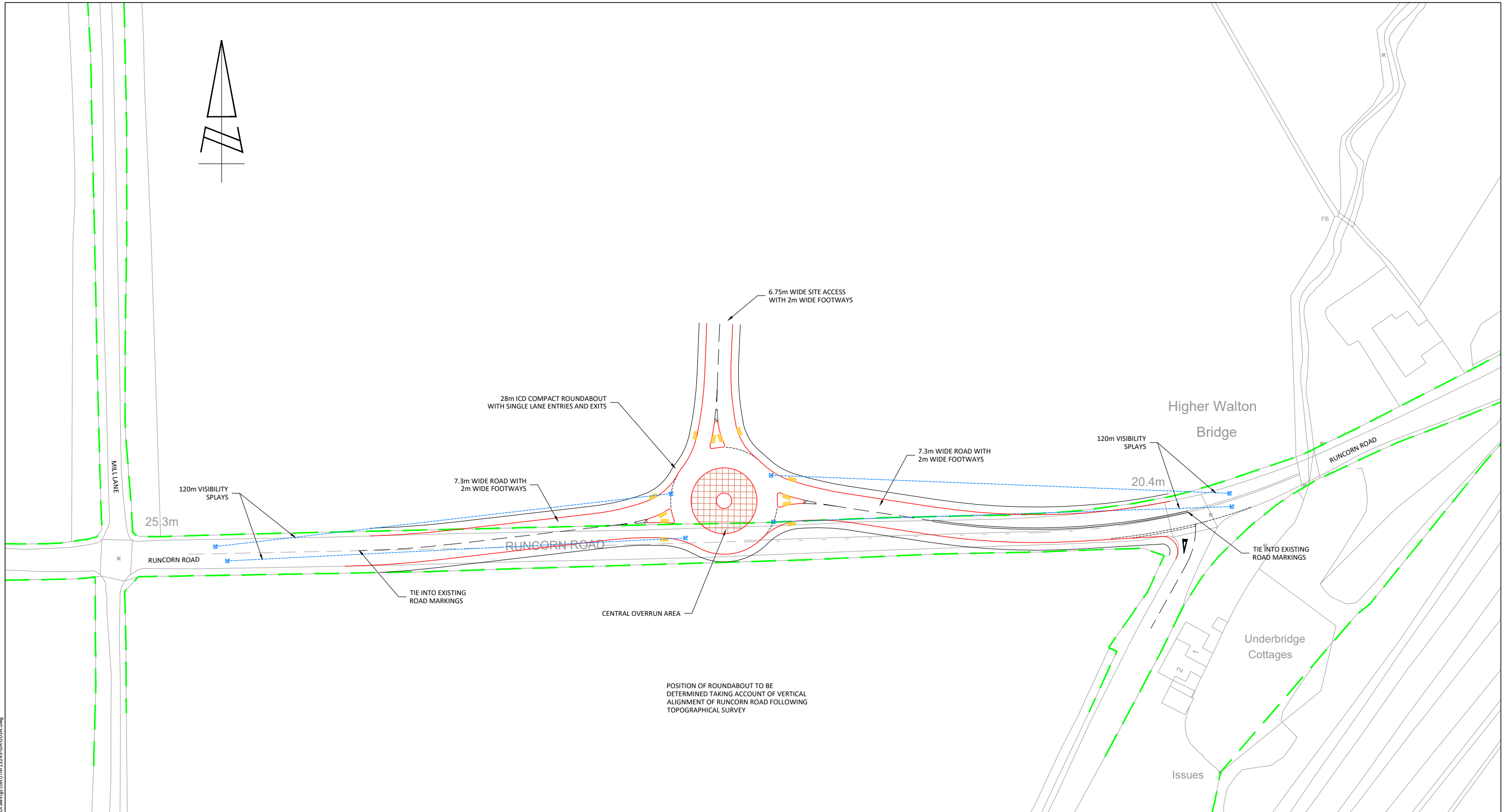
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STATUS: DRAFT					

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PROJECT: LAND AT HIGHER WALTON	CLIENT: PEEL L&P HOLDINGS (UK) LIMITED

SCALE @ A3: 1:1000	CHECKED: SEE	APPROVED: SEE
FILE REF: ITM13243-GA-002	DRAWN: PH	DATE: 07.09.2017
DRAWING No: (APPENDIX F) ITM13243 - GA - 002		
PROJECT No: ITM13243	REV: A	

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APPENDIX G.Potential Site Accesses off Runcorn Road



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SCALE BAR @ 1:1000



— — — — — HIGHWAY BOUNDARY



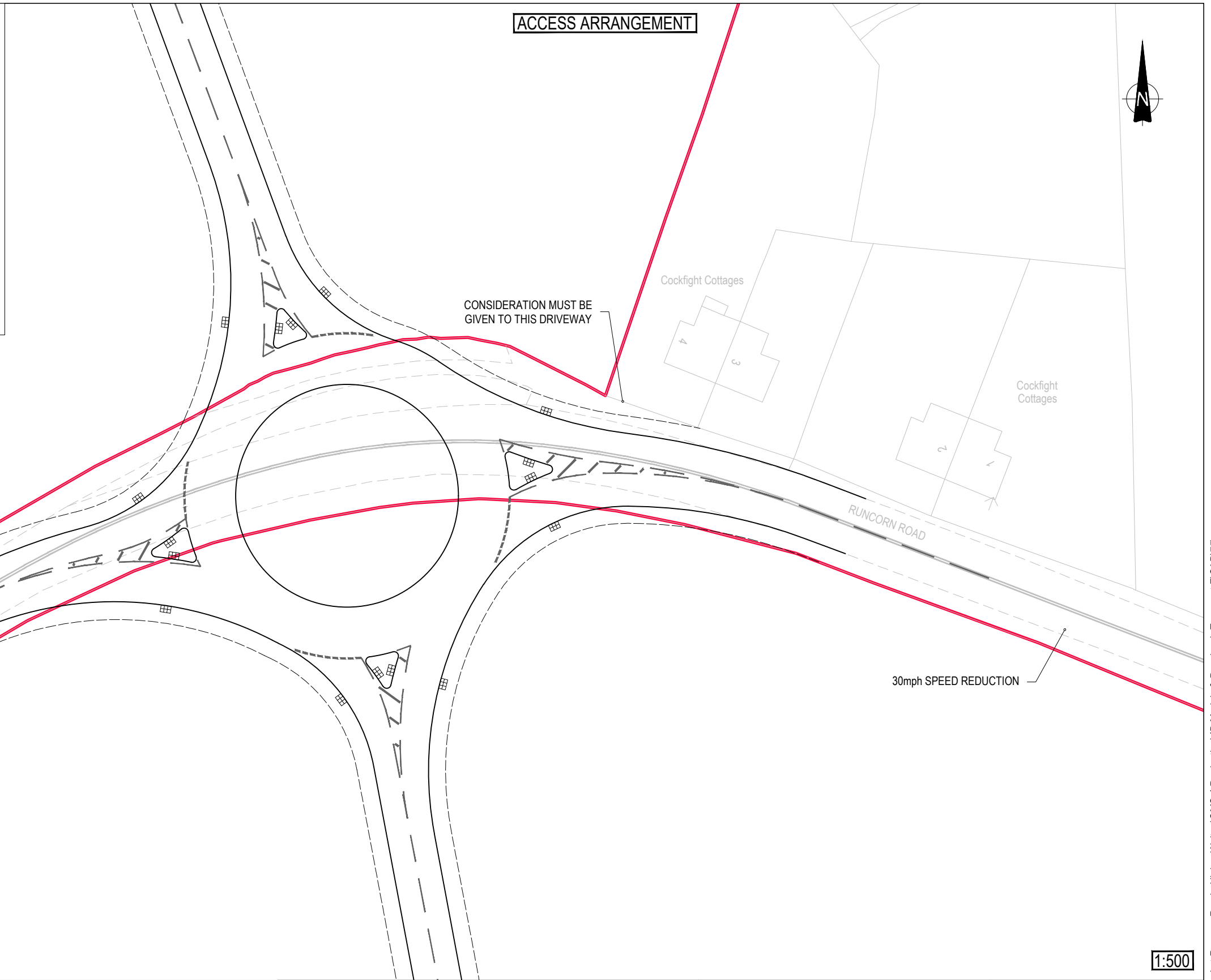
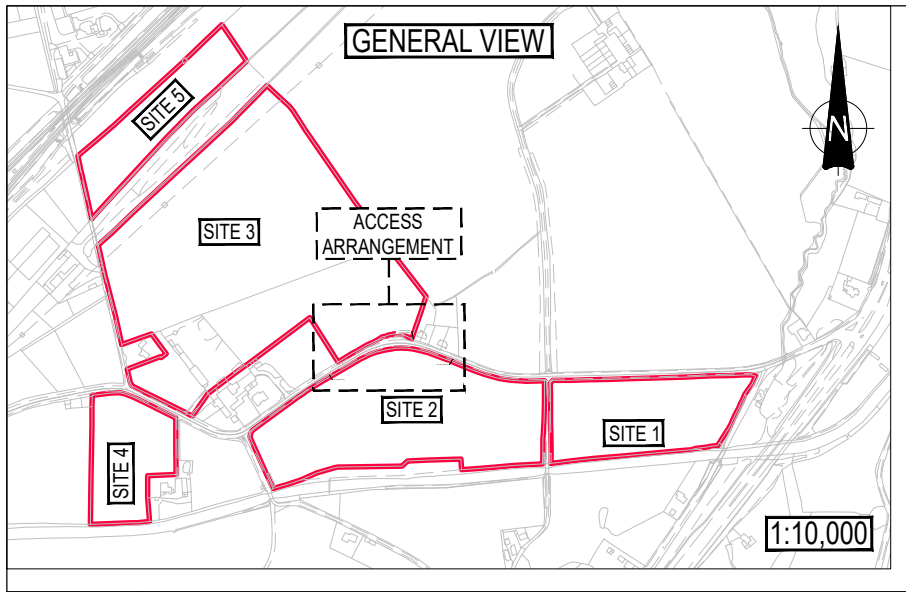
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Fax: 0161 830 2173

REV	DATE	BY	DESCRIPTION	CHK	APD
A	12.11.21	JB	CLIENT INFO UPDATED	JO	SE
STATUS: DRAFT					

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PROJECT: LAND AT HIGHER WALTON	CLIENT: PEEL L&P HOLDINGS (UK) LIMITED

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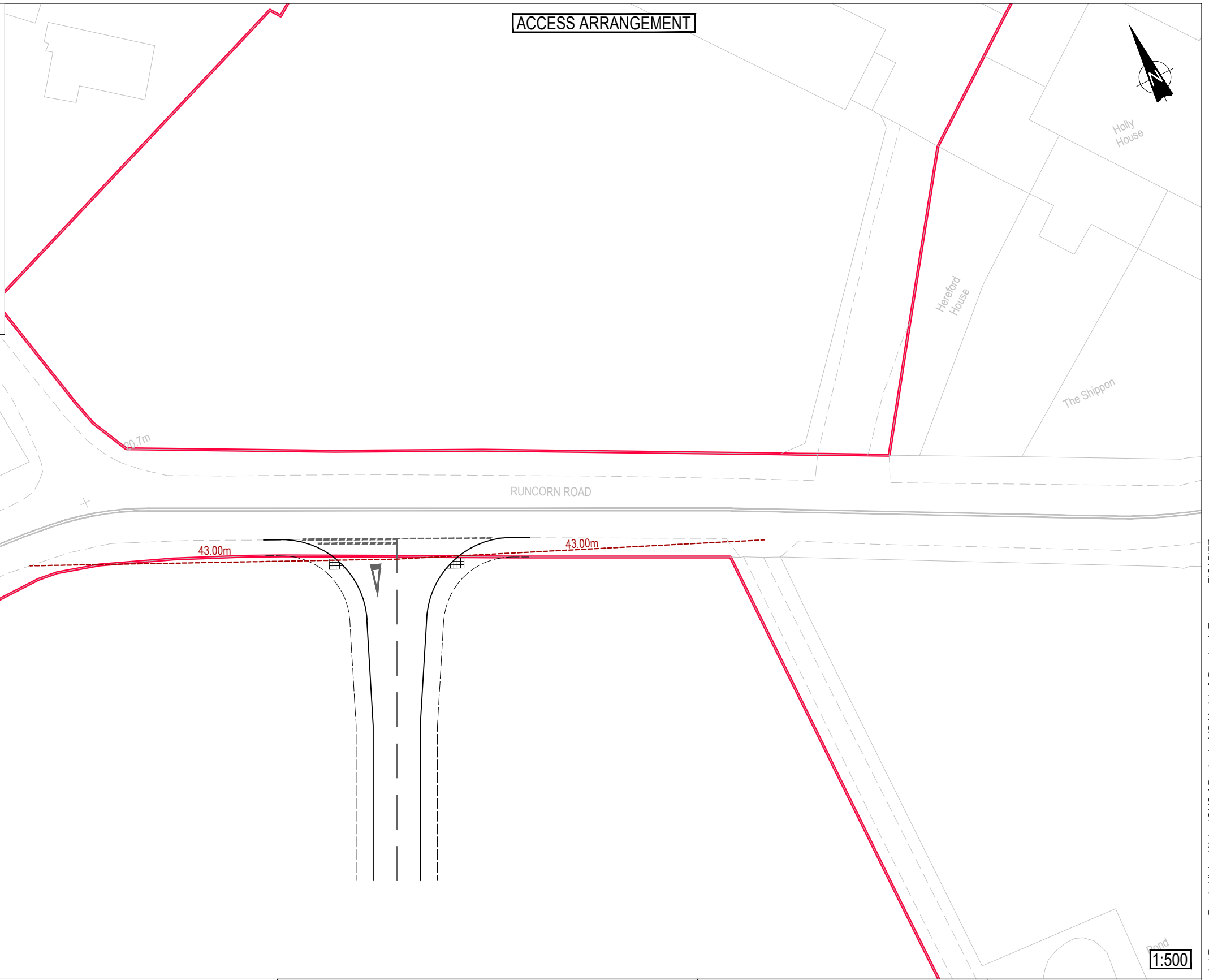
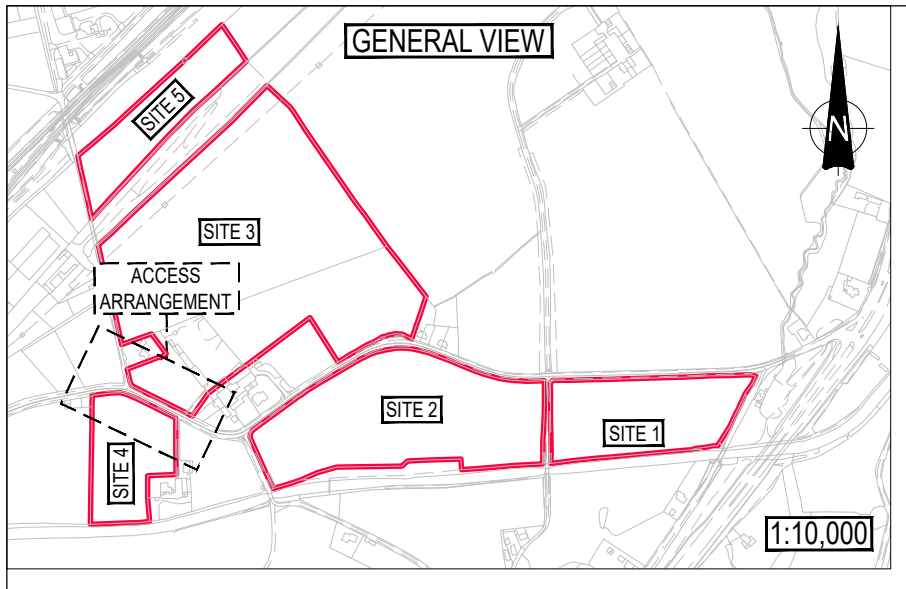
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		PROPOSED KERB LINE
		PROPOSED FOOTPATH
		PROPOSED ROAD MARKINGS

GENERAL NOTES:	Rev:	Description:	Date:	By:
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Project: LAND AT RUNCORN ROAD - WARRINGTON		Status: PRELIMINARY	
Drg Title: POTENTIAL ACCESS ARRANGEMENT SITES 2 & 3		Drawn By: DD	Checked By: AV
		Designed By: DD	Date: 20/11/17
Scale: AS INDICATED			
Project No:	Originator:	Zone:	Level:
66923	CUR	00	XX
Type:	Discipline:	Category / Number:	Rev:
DR	TP	75002	-P01



KEY:		INDICATIVE RED LINE
		PROPOSED KERB LINE
		PROPOSED FOOTPATH
		PROPOSED ROAD MARKINGS
		PROPOSED VISIBILITY SPLAYS AT 30mph

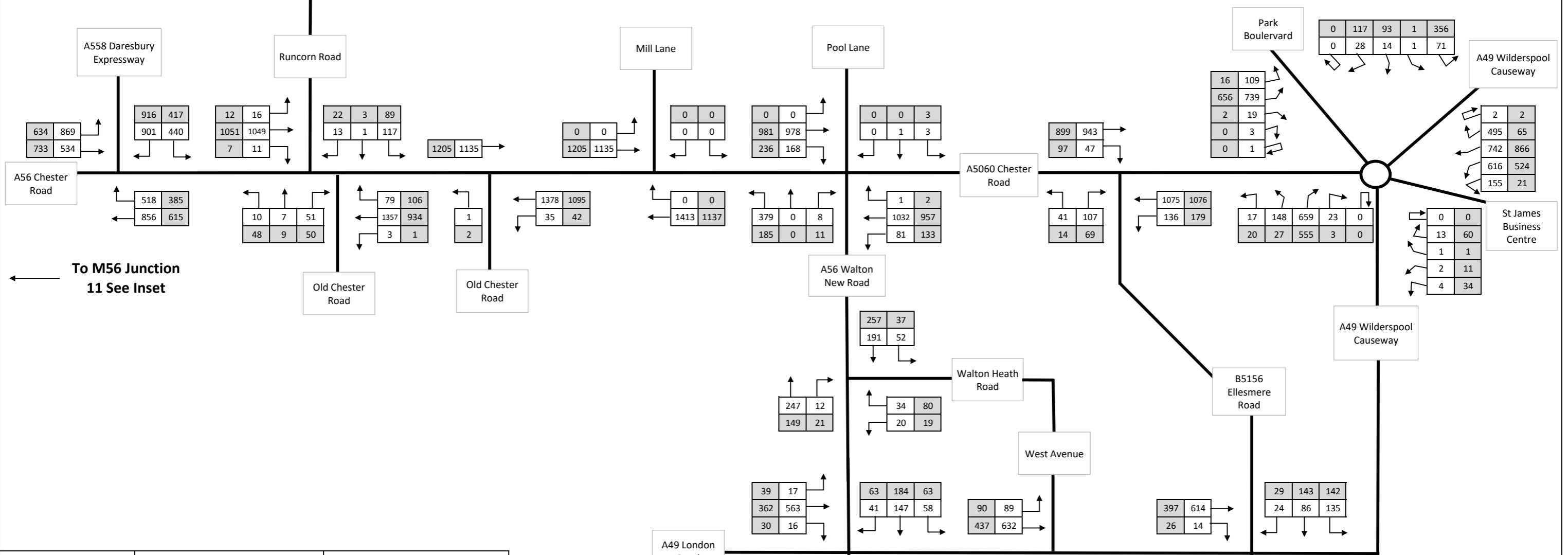
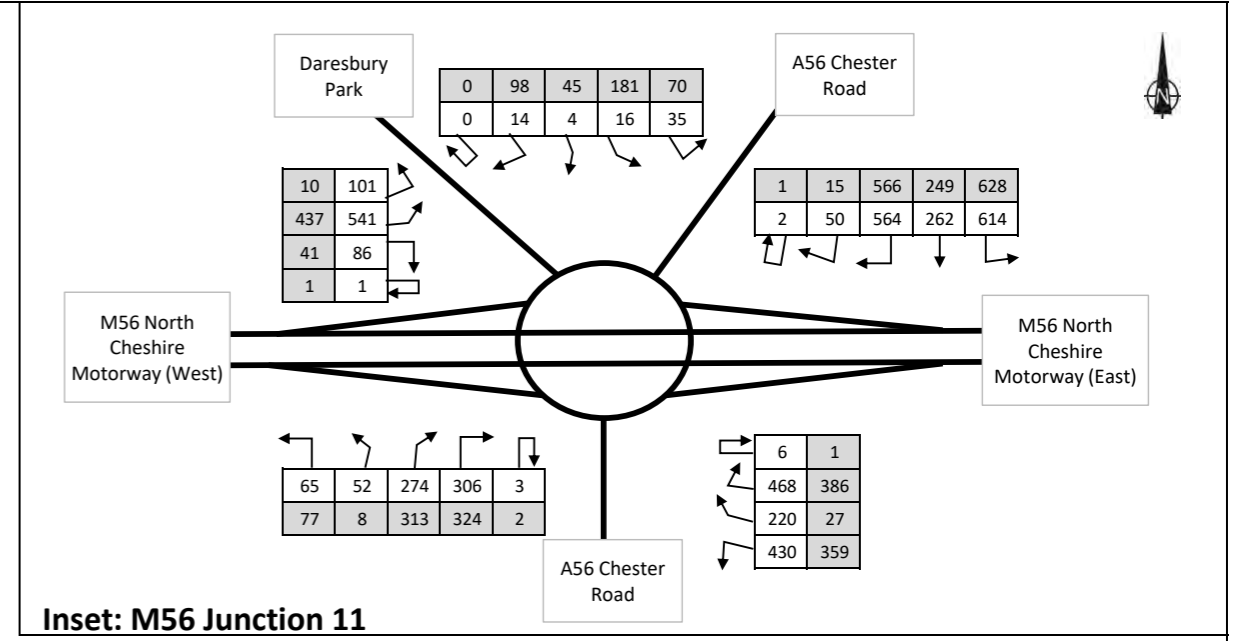
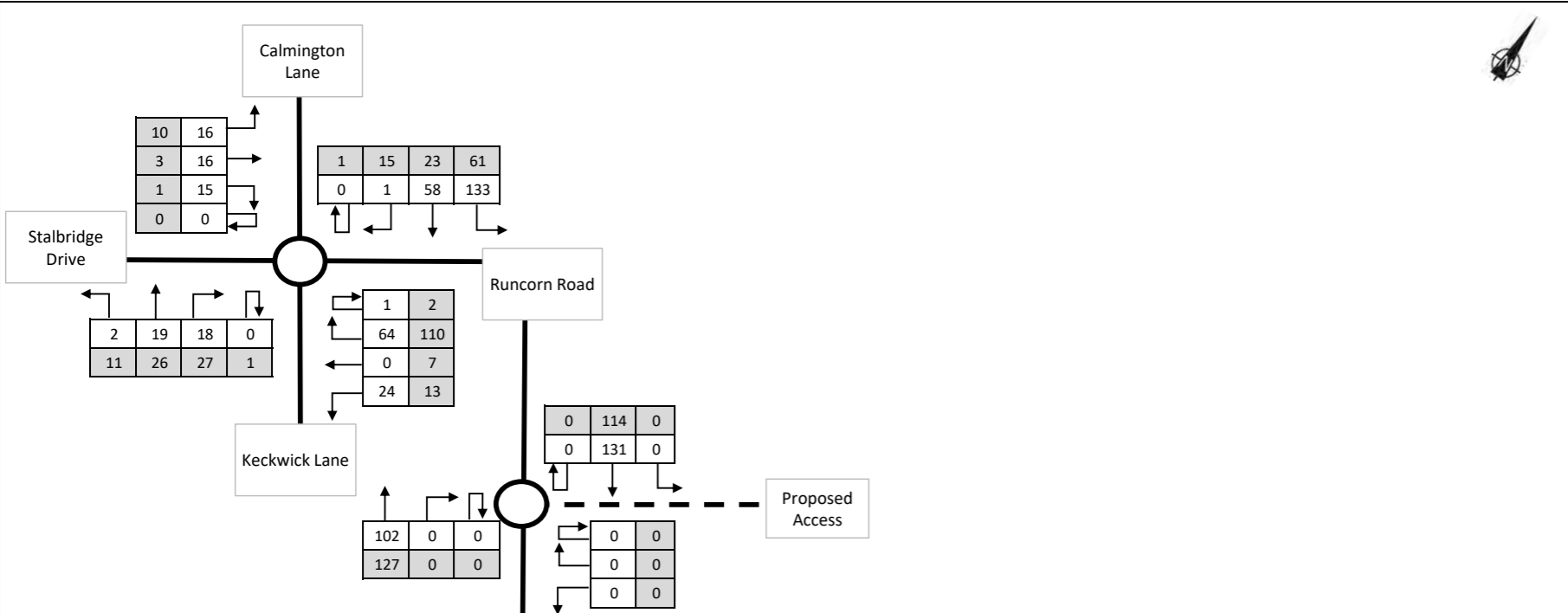
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Project: LAND AT RUNCORN ROAD - WARRINGTON		Status: PRELIMINARY	
Drg Title: POTENTIAL ACCESS ARRANGEMENT SITE 4		Drawn By: DD	Checked By: AV
		Designed By: DD	Date: 20/11/17
Scale: AS INDICATED			
Project No:	Originator:	Zone:	Level:
66923	CUR	00	XX
	DR	TP	
Category / Number:	Rev:		
75003	-P01		

APPENDIX H.2017 Observed Traffic Flows



KEY

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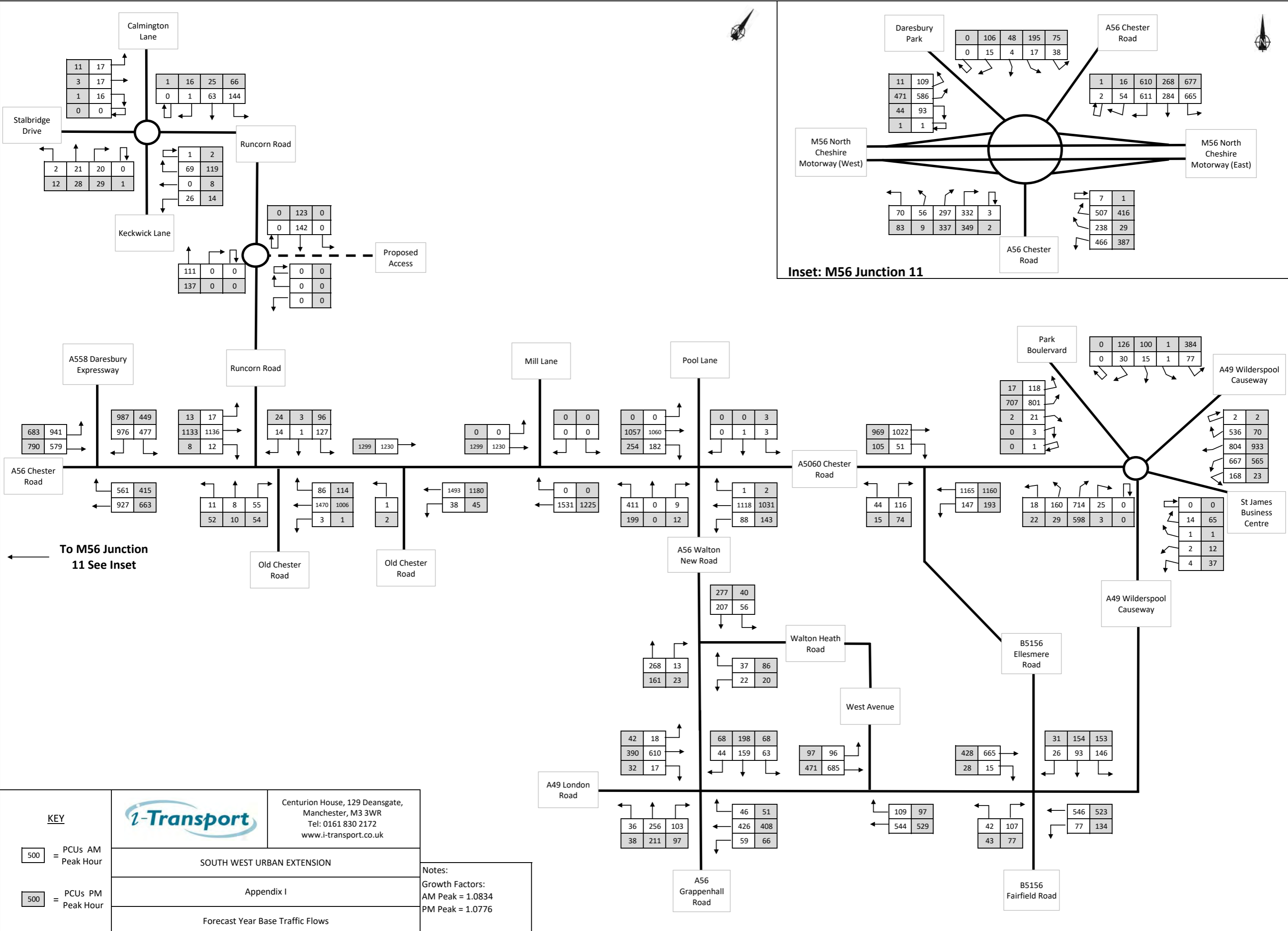
SOUTH WEST URBAN EXTENSION

Appendix H

2017 Observed

Notes:
 AM Peak - 07:45-08:45
 PM Peak - 16:00-17:00

APPENDIX I. Forecast Year Baseline Traffic Flows



KEY

= PCUs AM Peak Hour

= PCUs PM Peak Hour

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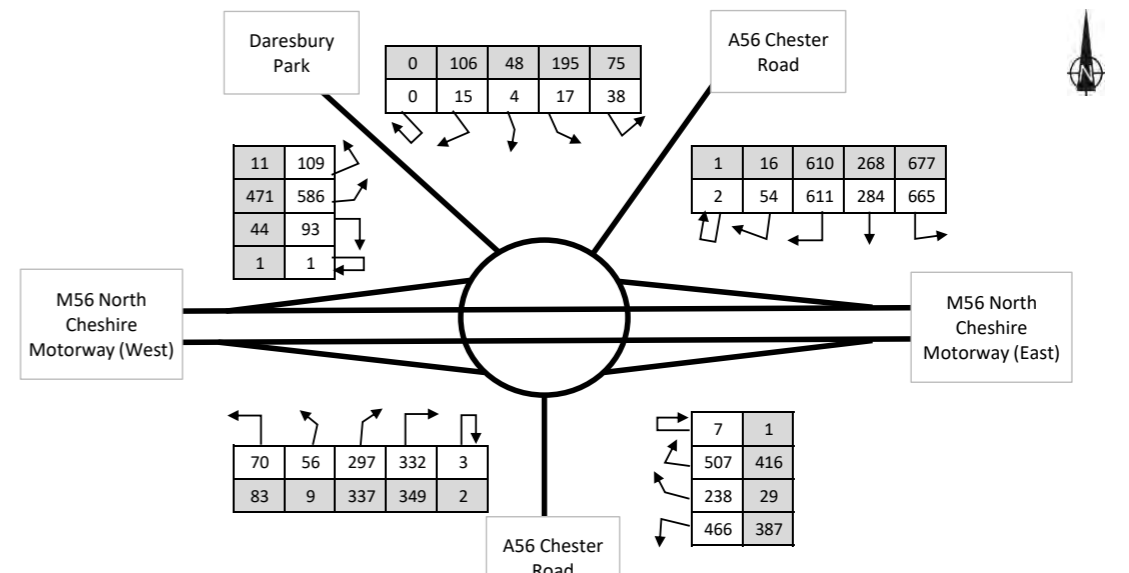
SOUTH WEST URBAN EXTENSION

Appendix I

Forecast Year Base Traffic Flows

Notes:
Growth Factors:
AM Peak = 1.0834
PM Peak = 1.0776

Inset: M56 Junction 11



To M56 Junction 11 See Inset

APPENDIX J. Development Trip Distribution and Assignment

Trip Generation by Trip PurposeDevelopment Quantum

1780 Dwellings

100% Houses Privately Owned

0% Affordable Housing

Trip Rates (TRICS 7.4.4) and Generation

80% trip generation assumed based on internalisation at full development

Time Period	Houses Privately Owned					
	Arrival	Departure	Two-Way	Arrival	Departure	Two-Way
AM Peak	0.127	0.377	0.504	181	537	718
PM Peak	0.309	0.164	0.473	440	234	674

Time Period	Affordable Housing					
	Arrival	Departure	Two-Way	Arrival	Departure	Two-Way
AM Peak	0.153	0.279	0.432	0	0	0
PM Peak	0.301	0.187	0.488	0	0	0

Time Period	Total Development		
	Arrival	Departure	Two-Way
AM Peak	181	537	718
PM Peak	440	234	674

Trip Purpose Proportions (TEMPro) - Car Driver

Trip Purpose	AM Peak					PM Peak			
	Origin	Destination	O+D	%	% Adjusted	Origin	Destination	O+D	%
Work	3,370	3,279	6,649	58%	58%	2,590	2,684	5,274	43%
Employers Business	426	399	825	7%	7%	355	372	727	6%
Education	704	558	1,262	11%	20%	242	298	540	4%
Shopping	749	517	1,266	11%	6%	902	1,024	1,926	16%
Personal Business	372	286	658	6%	4%	455	496	951	8%
Recreation/Social	207	132	339	3%	2%	526	518	1,044	9%
Visiting	87	75	162	1%	1%	622	651	1,273	10%
Holiday/Day Trip	139	147	286	2%	2%	257	249	506	4%

(Based on MSOA - Warrington023, 024 and 025)

Adjustment to AM Peak hour proportions from AM Peak period in TEMPro

Trip Generation by Purpose

Trip Purpose	AM Peak			PM Peak		
	Arrival	Departure	Two-Way	Arrival	Departure	Two-Way
Work	105	311	416	190	101	290
Employers Business	13	38	50	26	14	40
Education	36	107	144	19	10	30
Shopping	11	32	43	69	37	106
Personal Business	7	21	29	34	18	52
Recreation/Social	4	11	14	38	20	57
Visiting	2	5	7	46	24	70
Holiday/Day Trip	4	11	14	18	10	28
Total	181	537	718	440	234	674

Trip Generation for Distribution Splits

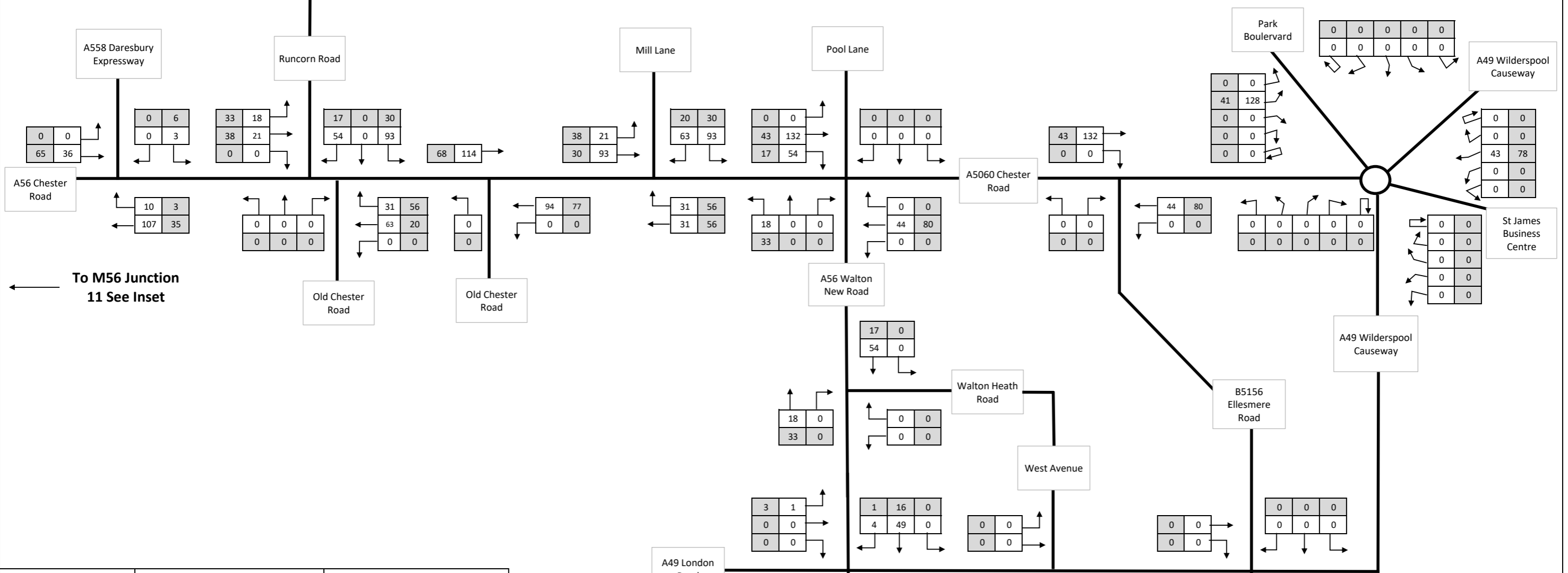
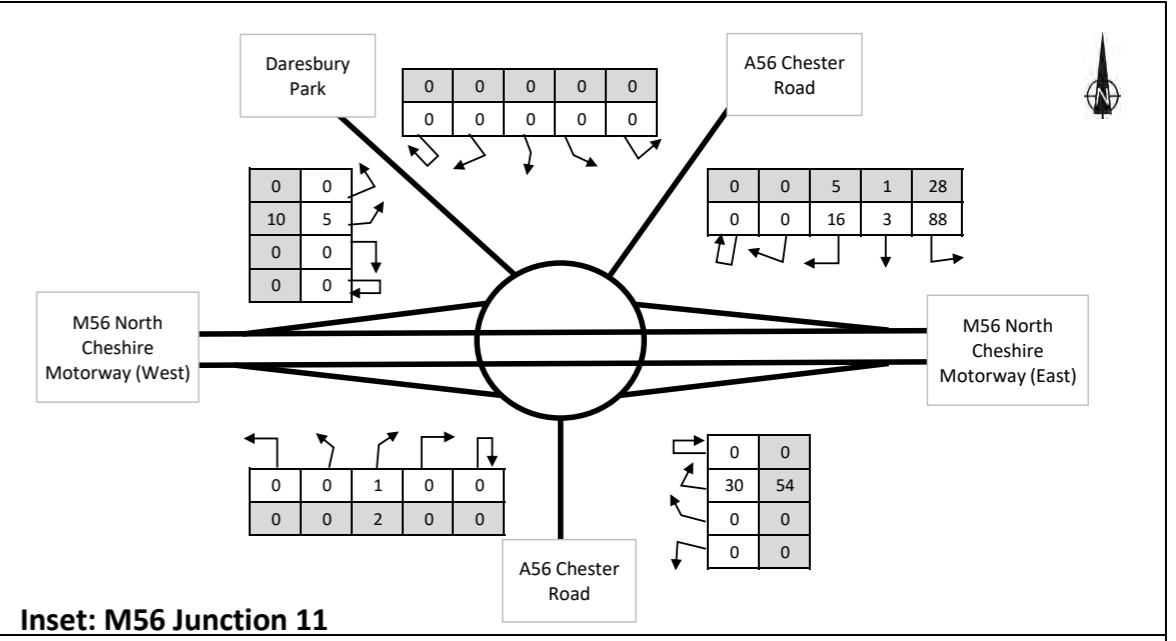
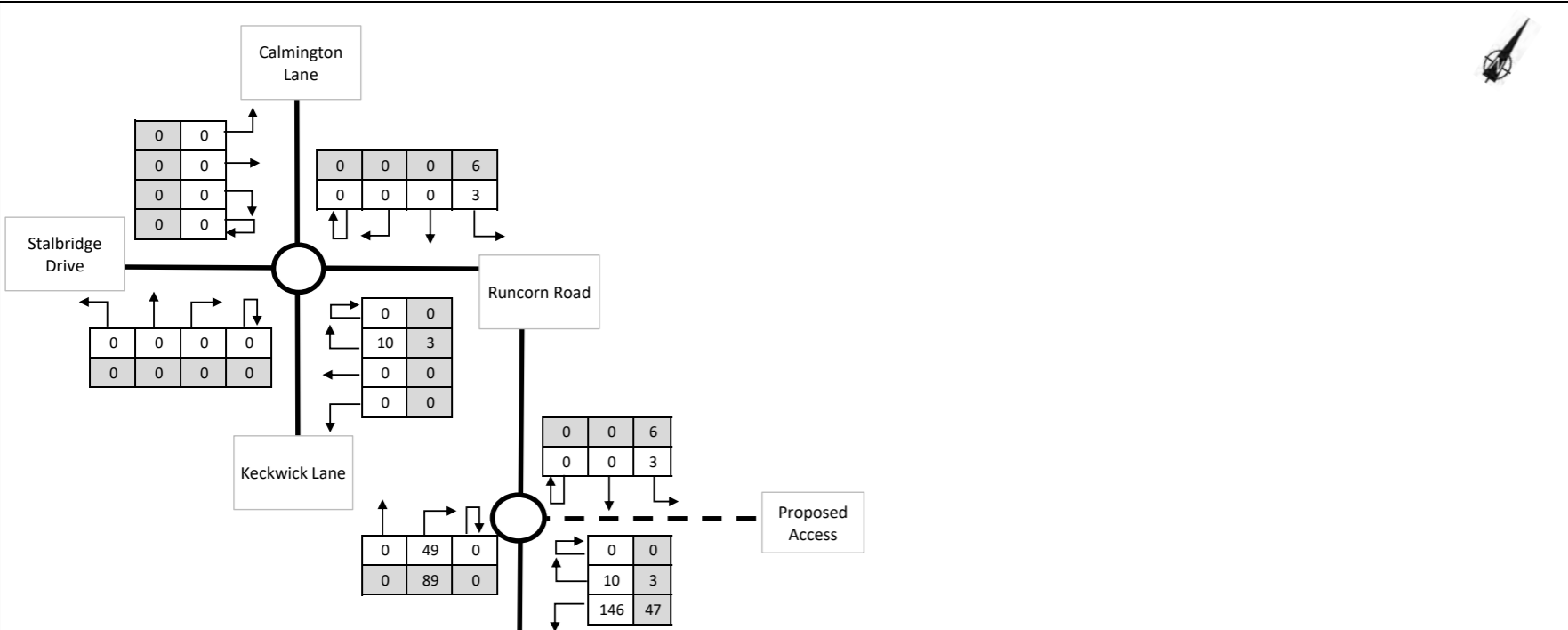
Education 67% Primary 33% Secondary

Shopping 50% Food 50% Non-Food

Personal/Recreation/Visiting/Holiday all combined

Trip Purpose	AM Peak			PM Peak		
	Arrival	Departure	Two-Way	Arrival	Departure	Two-Way
Work	105	311	416	190	101	290
Employers Business	13	38	50	26	14	40
Education - Primary	24	72	96	13	7	20
Education - Secondary	12	35	47	6	3	10
Shopping - Food	5	16	22	35	18	53
Shopping - Non Food	5	16	22	35	18	53
Personal Business						
Recreation/Social						
Visiting						
Holiday/Day Trip						
Total	181	537	718	440	234	674

**APPENDIX K. Development Traffic Flows – 1,780
Dwellings**



KEY

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= PCUs AM Peak Hour

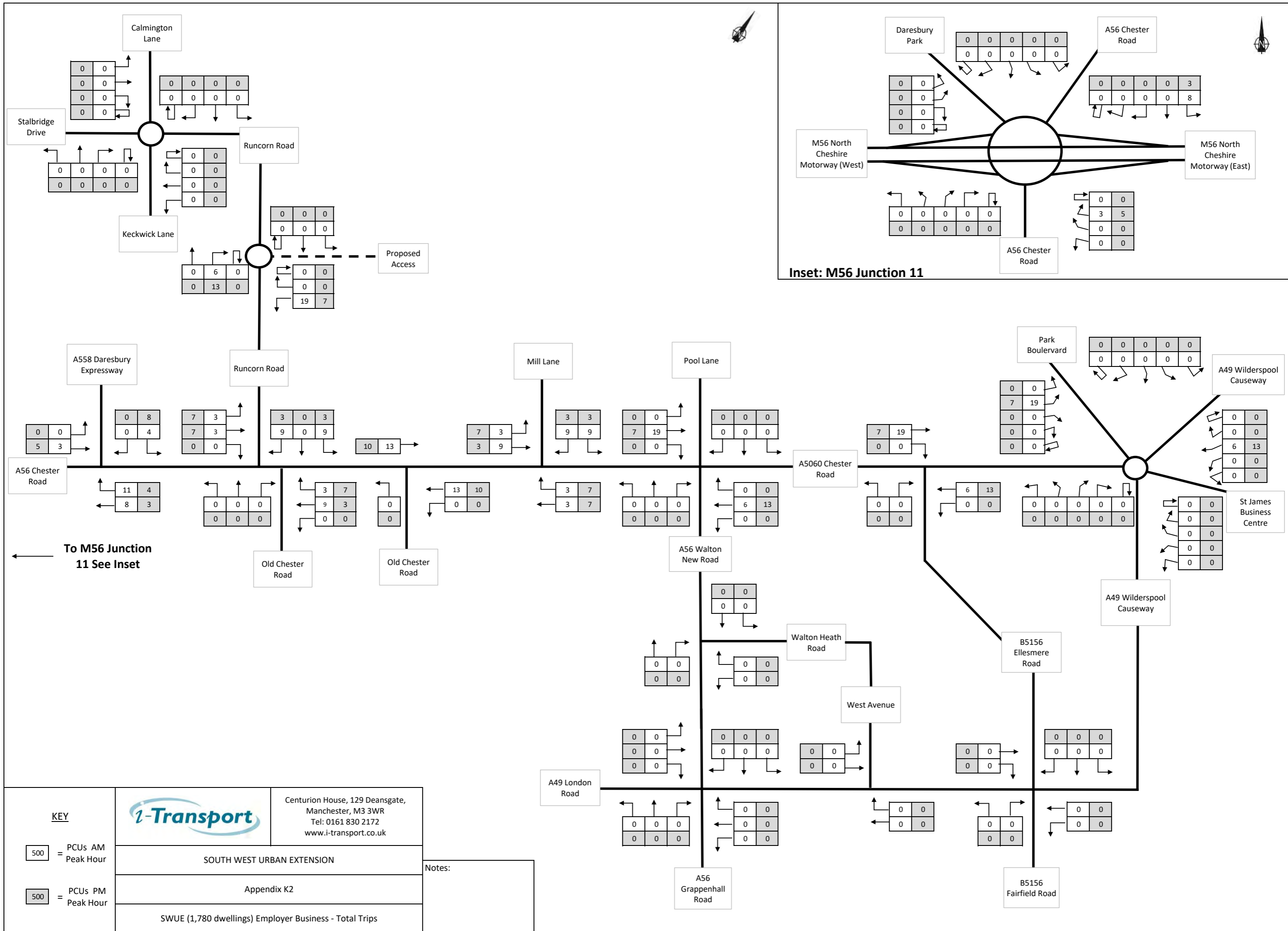
= PCUs PM Peak Hour

SOUTH WEST URBAN EXTENSION

Appendix K1

SWUE (1,780 dwellings) Journey to Work - Total Trips

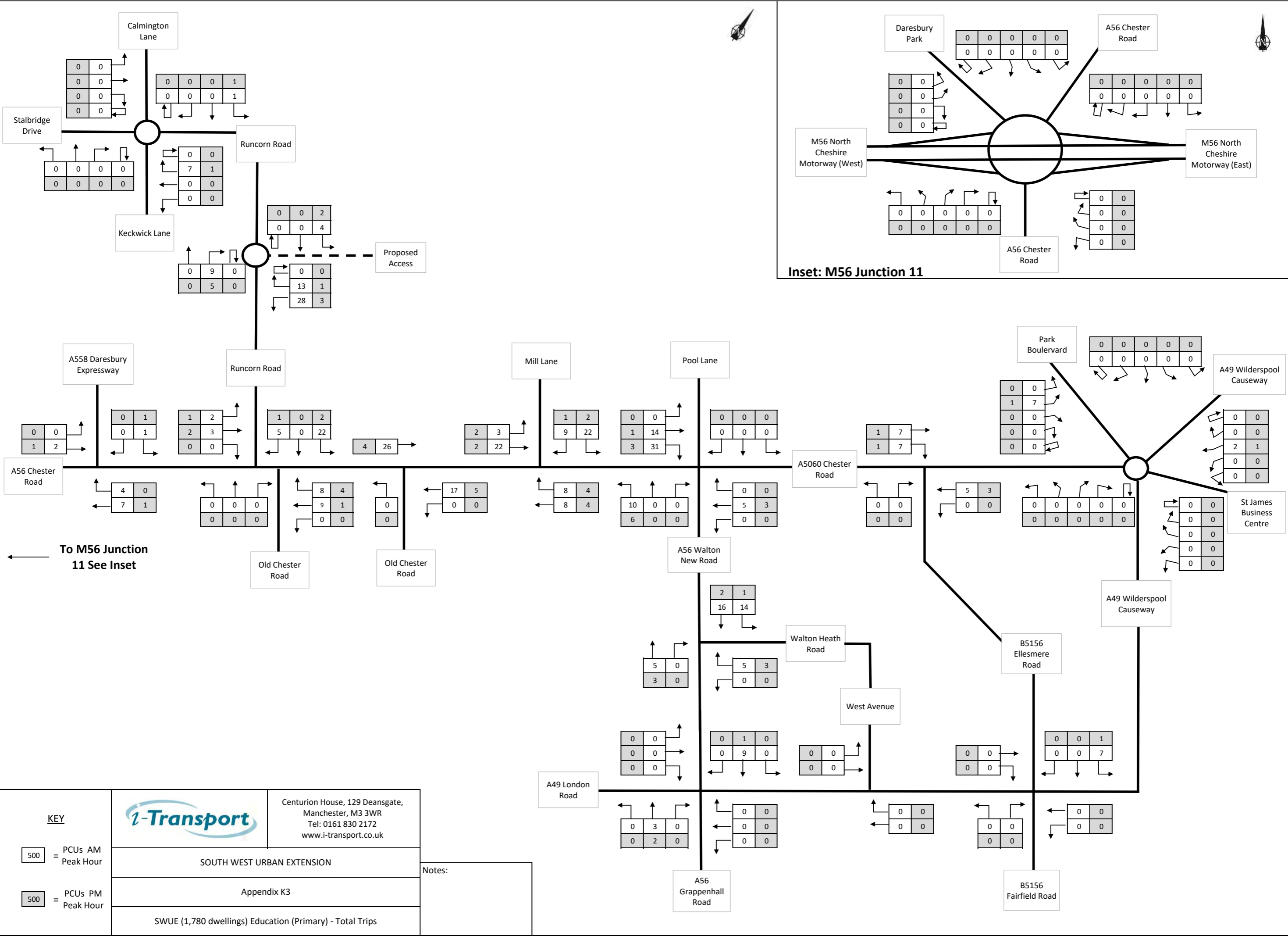
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Inset: M56 Junction 11

To M56 Junction 11 See Inset

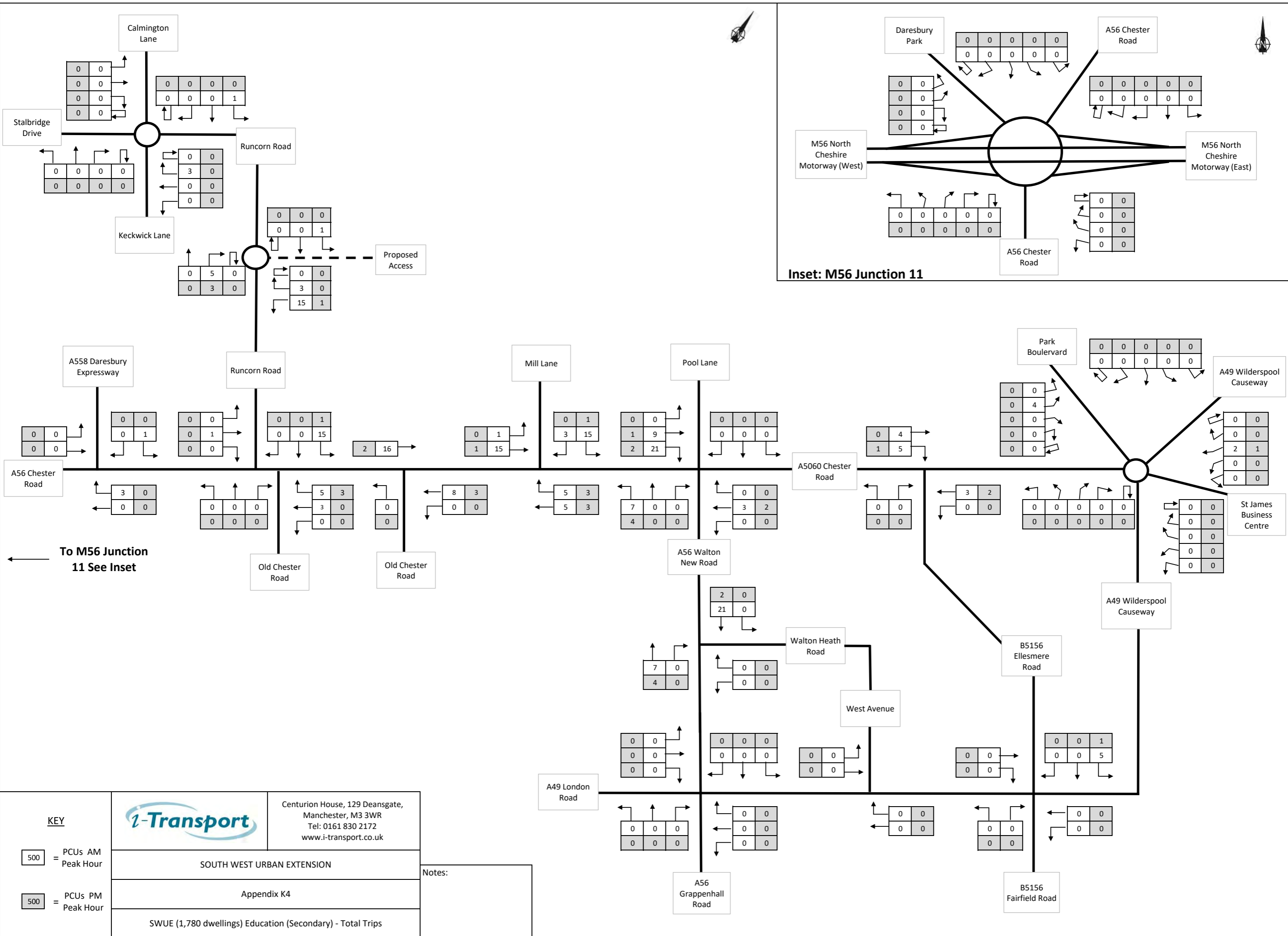
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	<p>SOUTH WEST URBAN EXTENSION</p>		
	<p>Appendix K2</p>		
	<p>SWUE (1,780 dwellings) Employer Business - Total Trips</p>		



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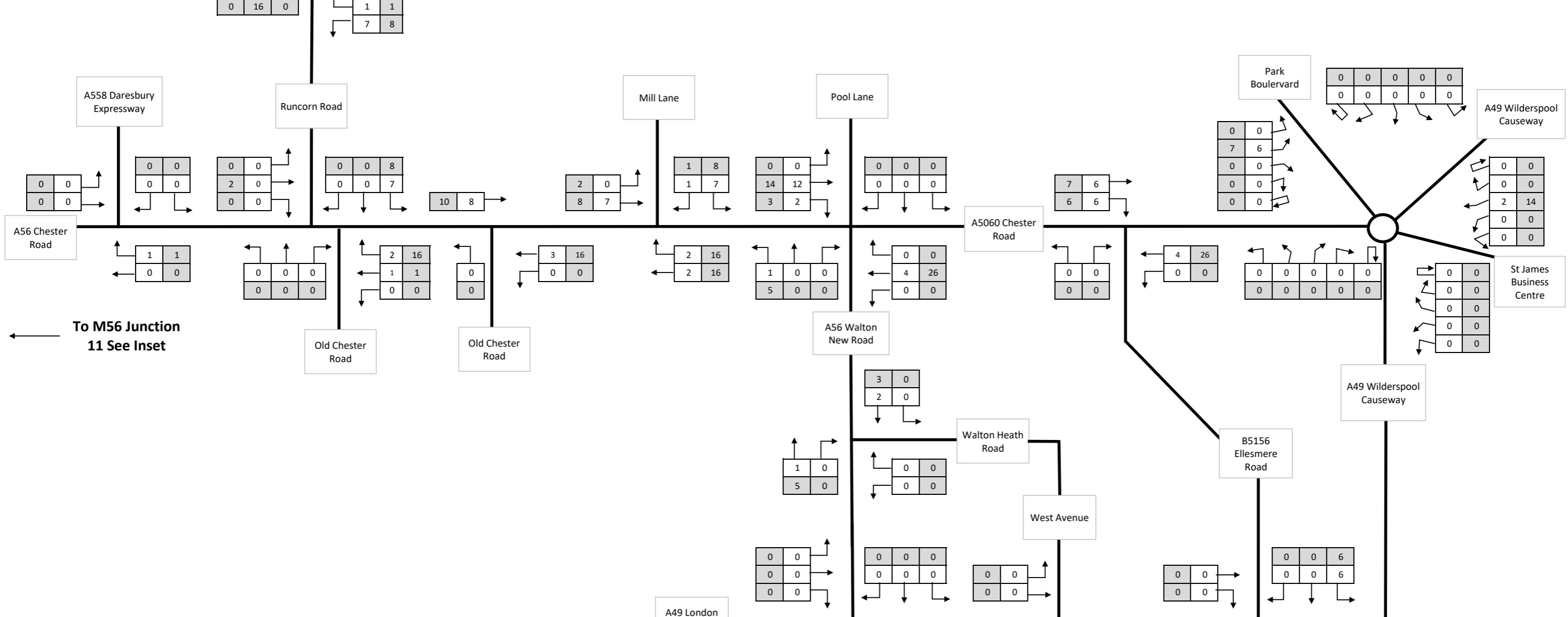
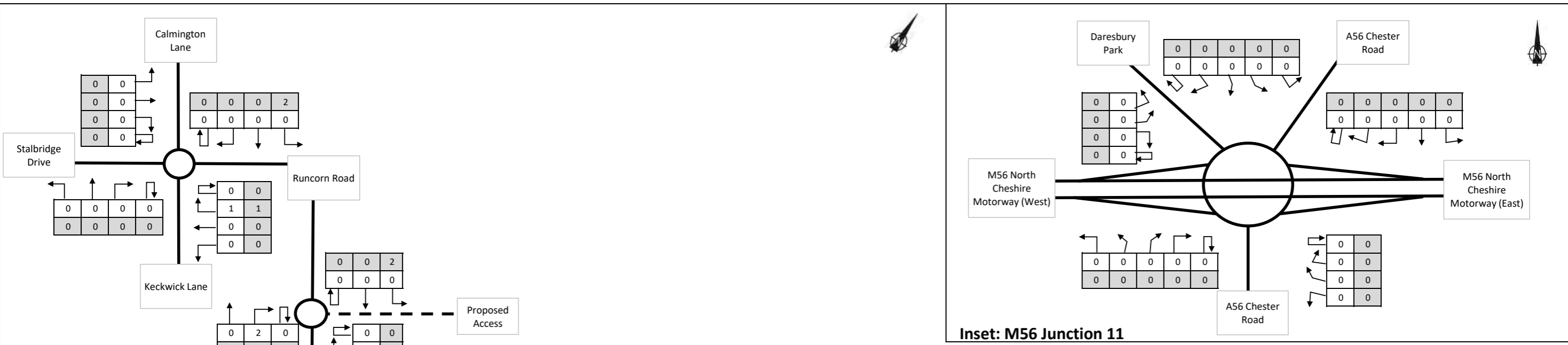
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	<p>SOUTH WEST URBAN EXTENSION</p>	
	<p>Appendix K3</p>	
	<p>SWUE (1,780 dwellings) Education (Primary) - Total Trips</p>	

Notes:

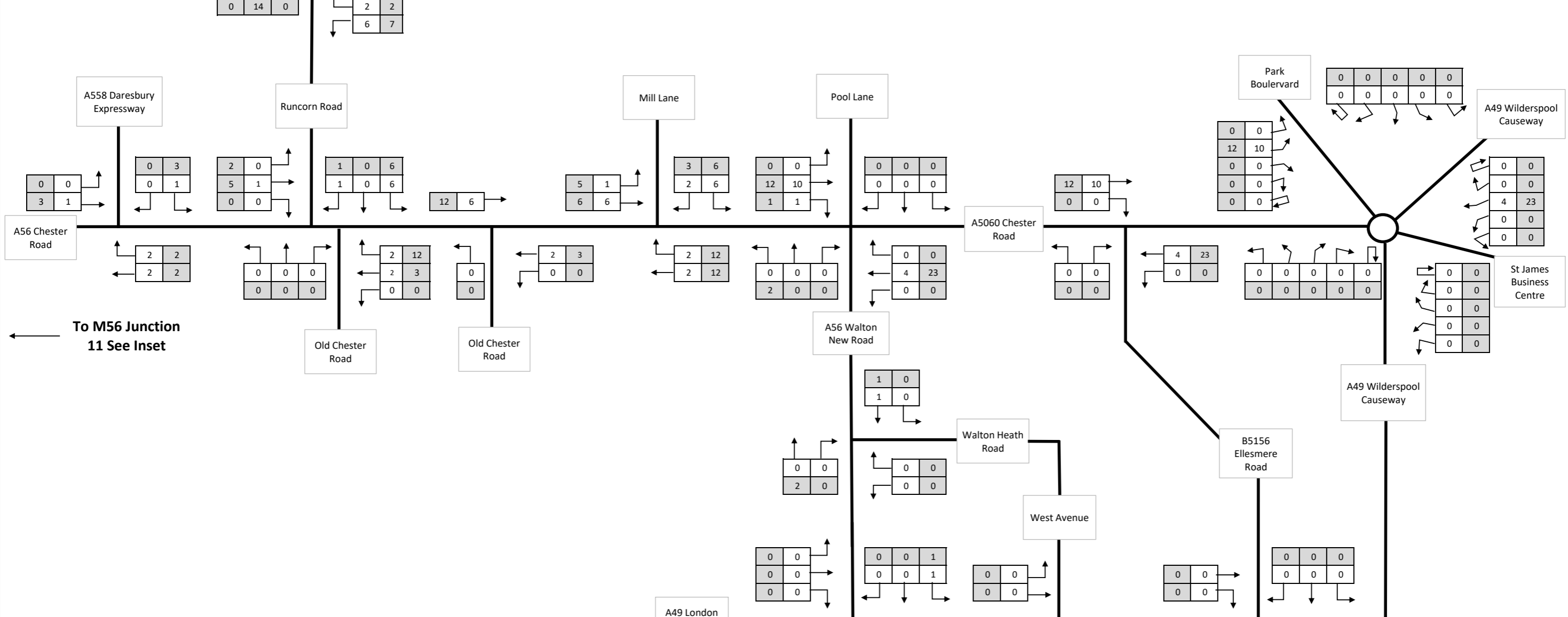
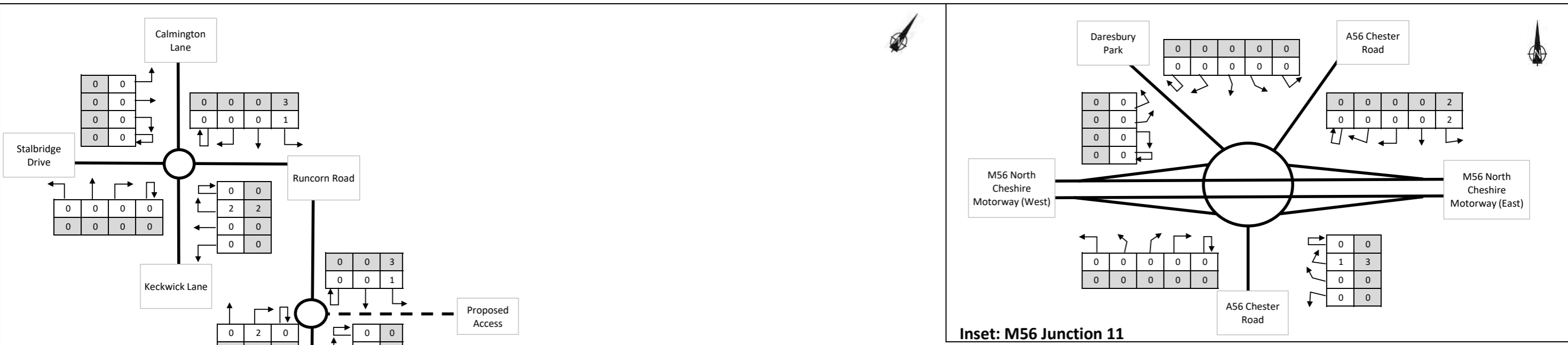


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	<p>SOUTH WEST URBAN EXTENSION</p>		
	<p>Appendix K4</p>		
	<p>SWUE (1,780 dwellings) Education (Secondary) - Total Trips</p>		



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	<p>SOUTH WEST URBAN EXTENSION</p>		
	<p>Appendix K5</p>		
	<p>SWUE (1,780 dwellings) Shopping (Food) - Total Trips</p>		



KEY

500 = PCUs AM Peak Hour

500 = PCUs PM Peak Hour

1-Transport

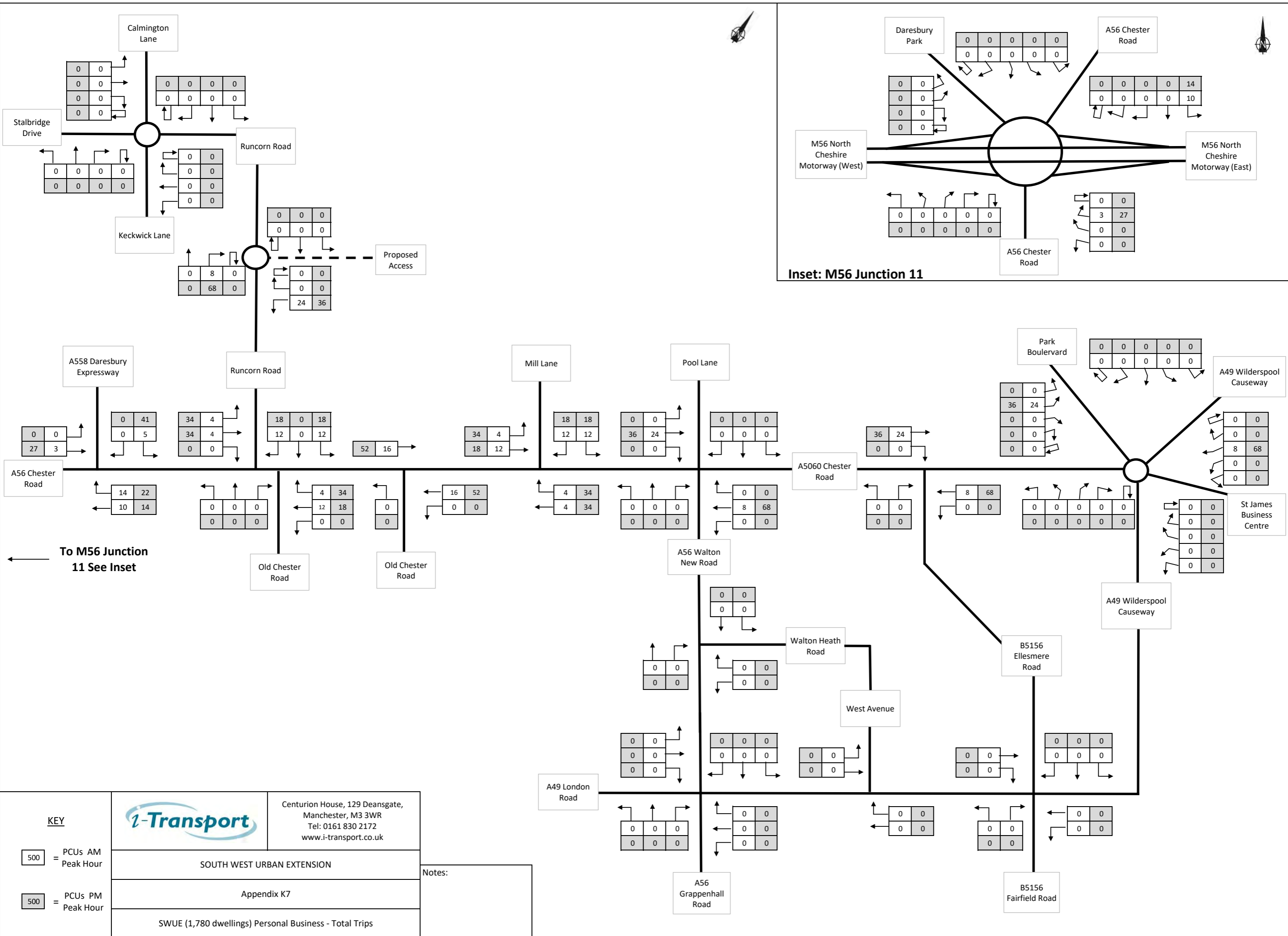
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SOUTH WEST URBAN EXTENSION

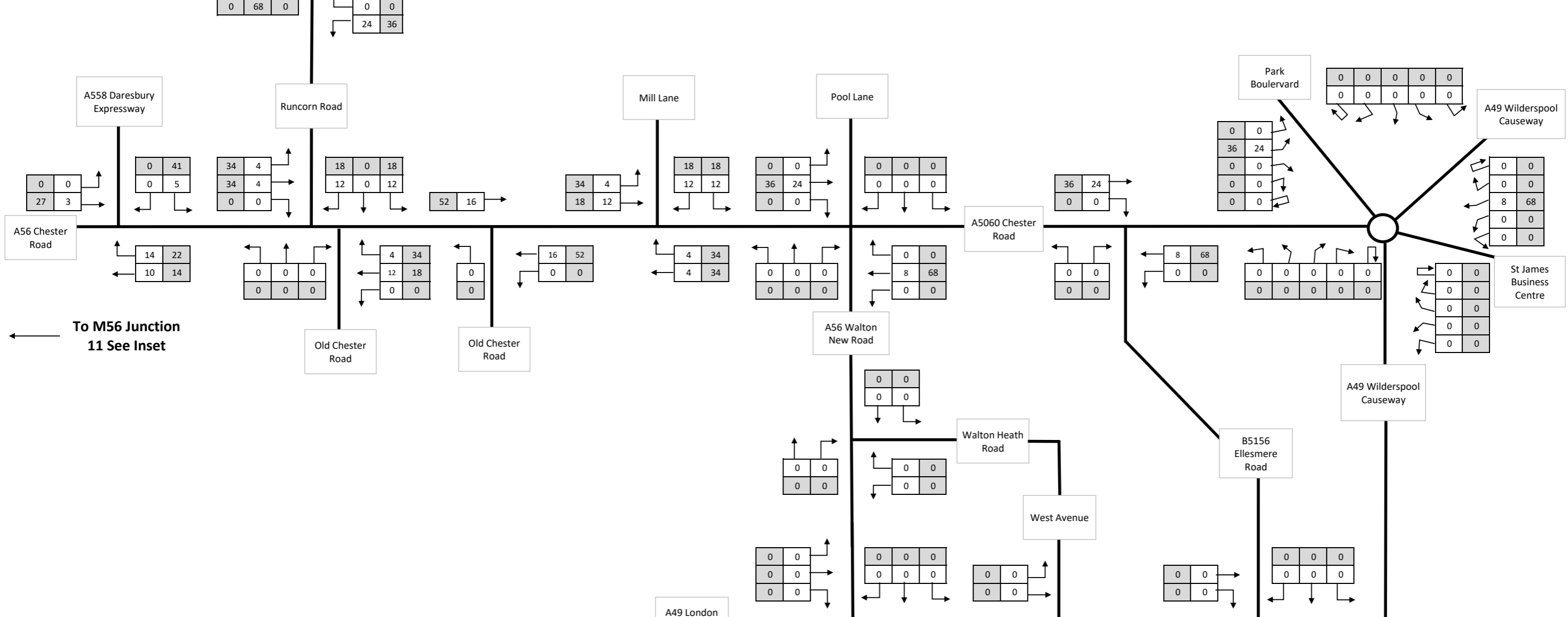
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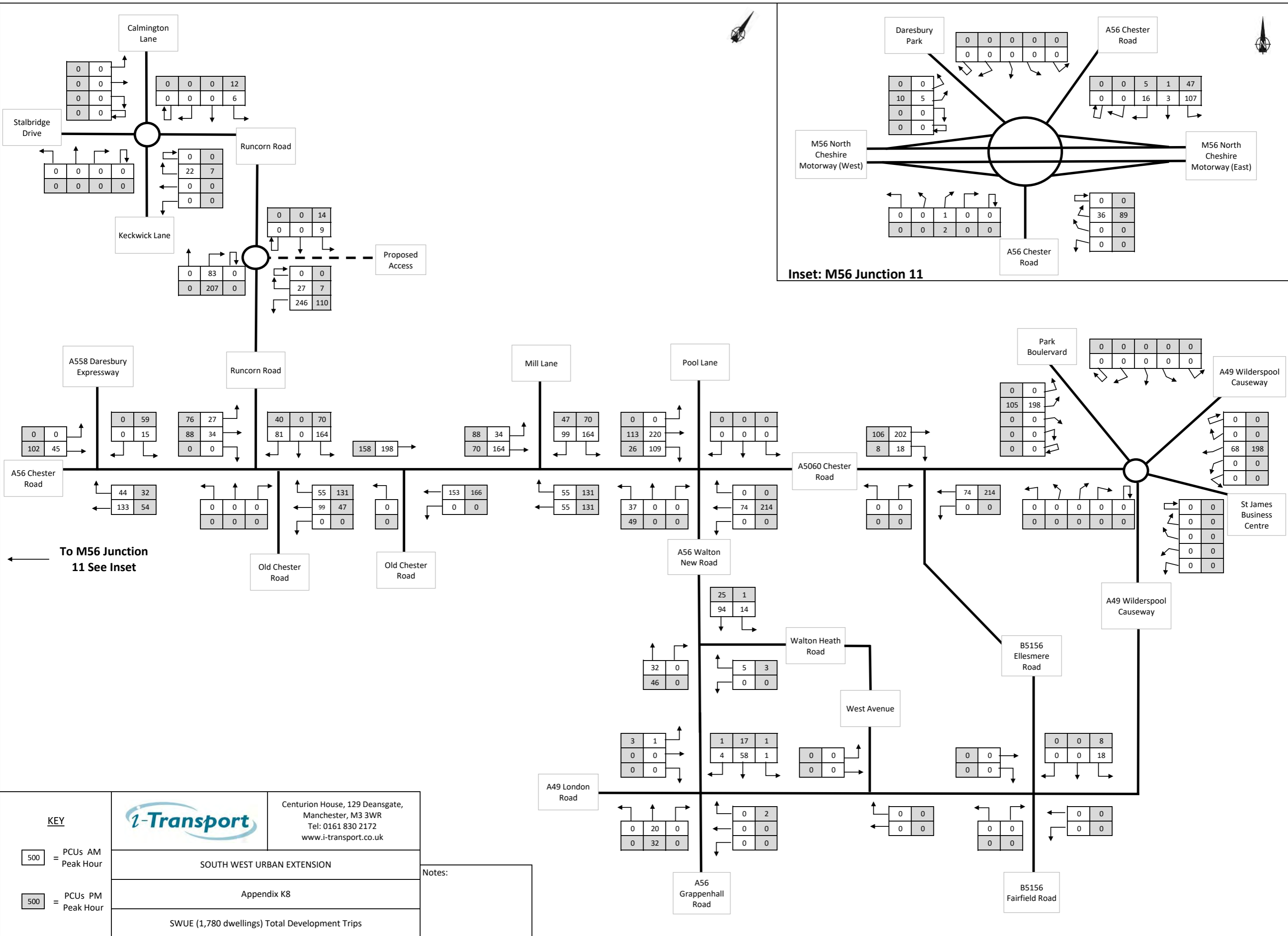
SWUE (1,780 dwellings) Shopping (Non-Food) - Total Trips

Notes:



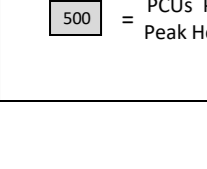
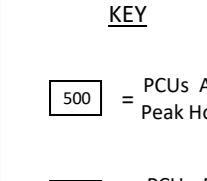
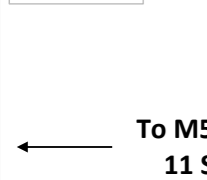
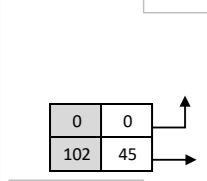
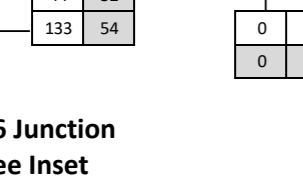
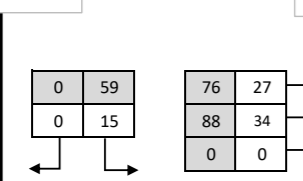
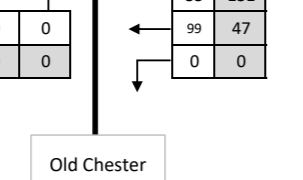
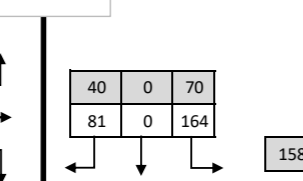
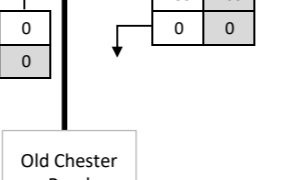
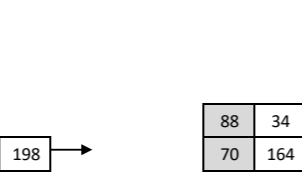
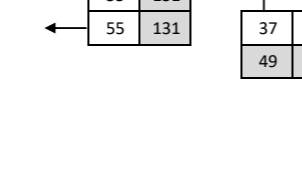
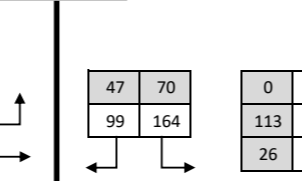
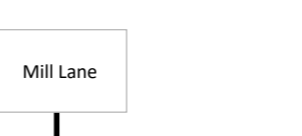
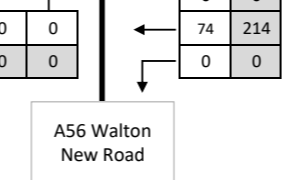
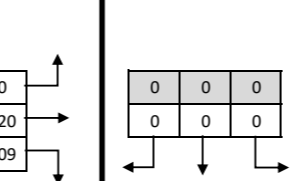
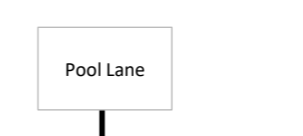
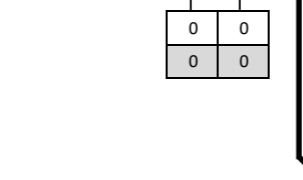
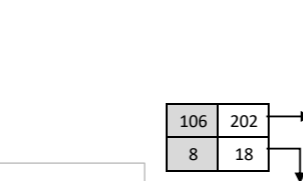
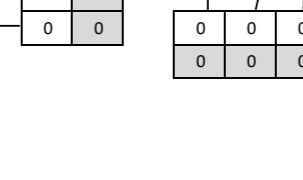
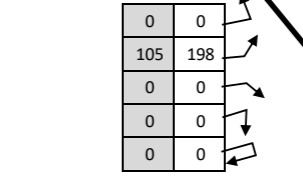
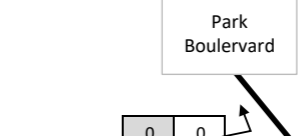
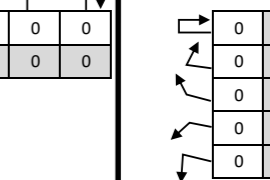
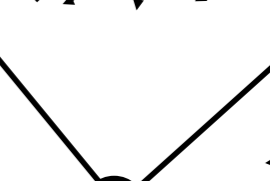
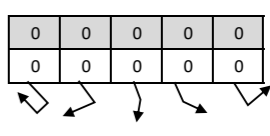
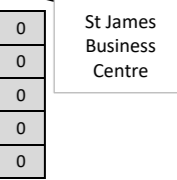
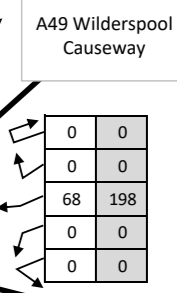
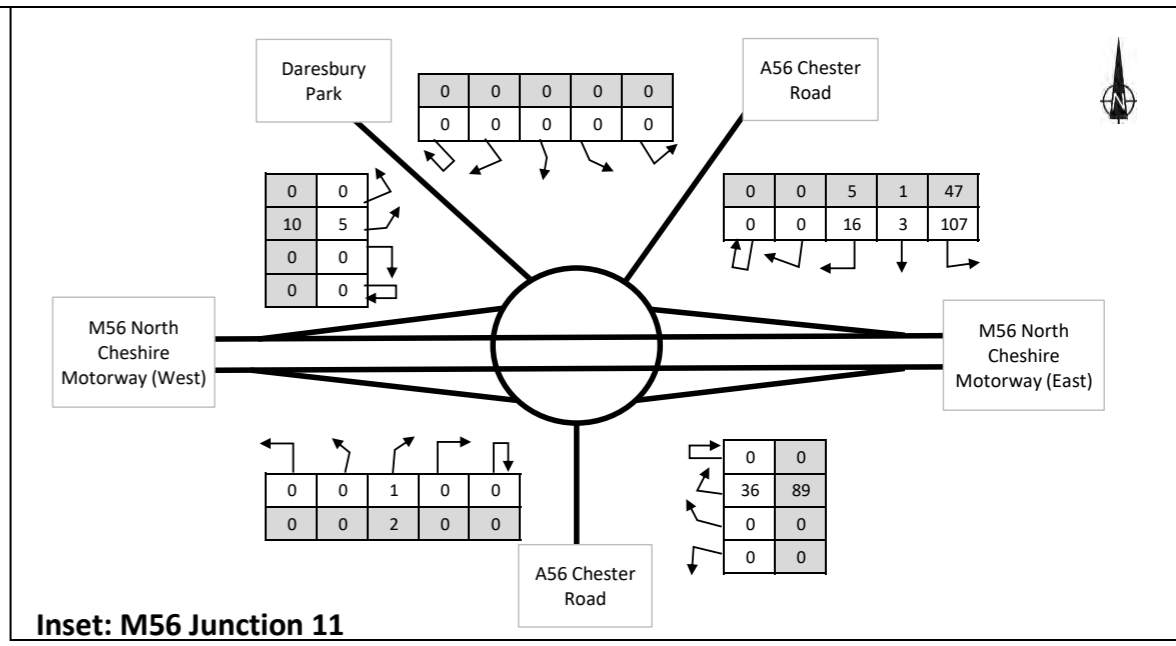
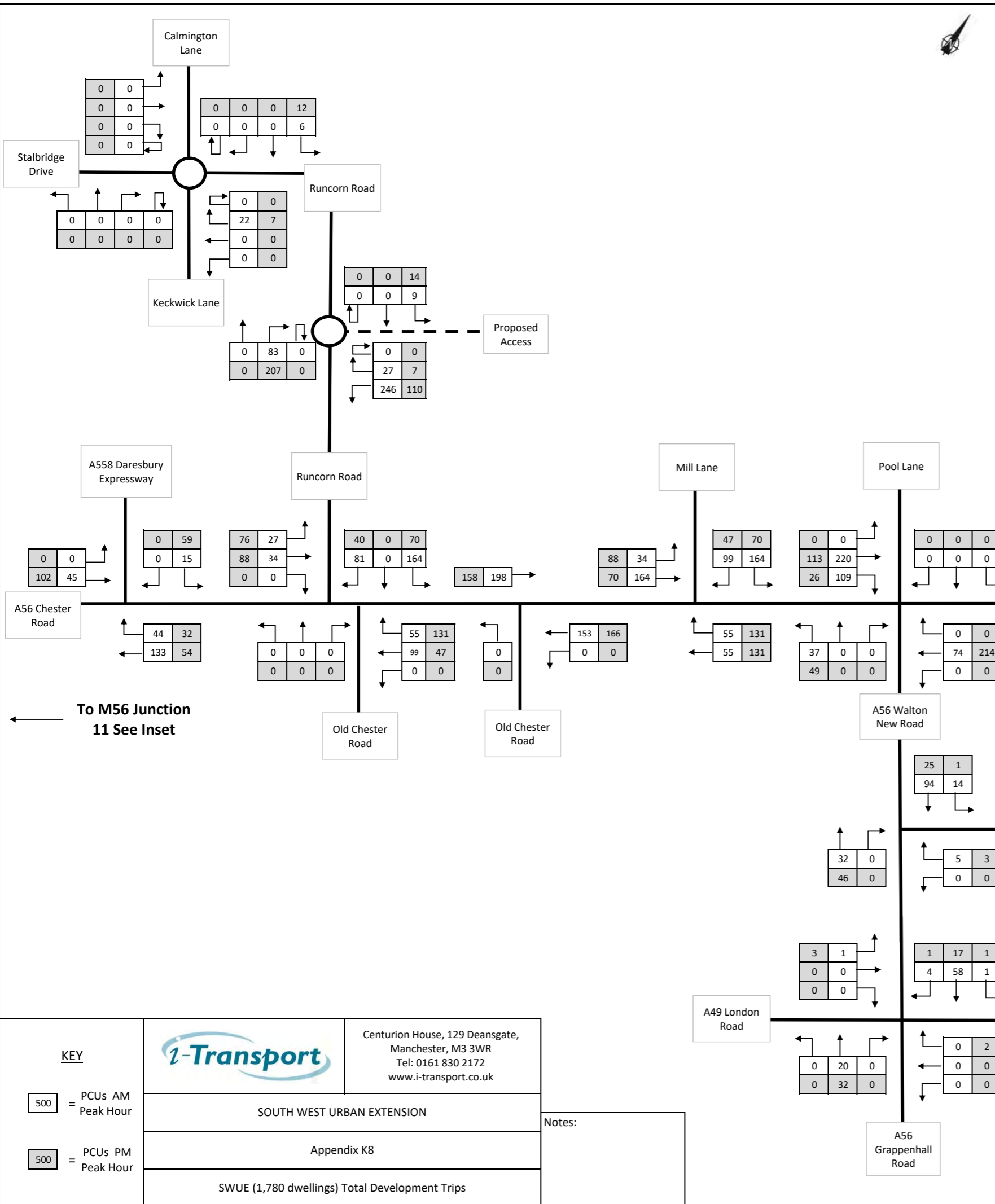
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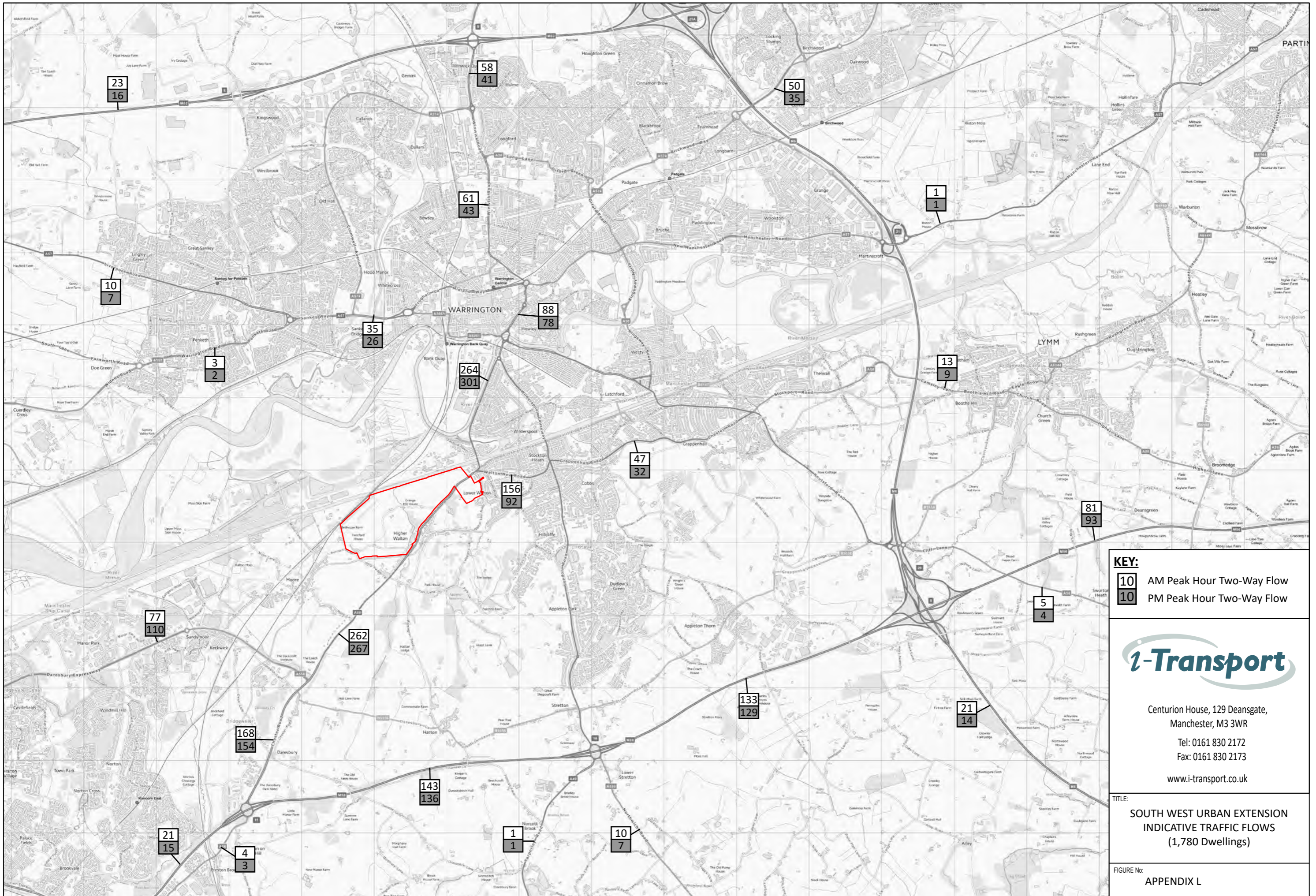


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To M56 Junction 11 See Inset



APPENDIX L. Development Traffic Flows on the Wider Highway Network – 1,780 Dwellings



KEY:
10 AM Peak Hour Two-Way Flow
10 PM Peak Hour Two-Way Flow



Centurion House, 129 Deansgate,
 Manchester, M3 3WR
 Tel: 0161 830 2172
 Fax: 0161 830 2173
 www.i-transport.co.uk

TITLE:
**SOUTH WEST URBAN EXTENSION
 INDICATIVE TRAFFIC FLOWS
 (1,780 Dwellings)**

FIGURE No:
APPENDIX L



Appendix 4: Viability Evidence – general comments and SWUE appraisal

**REPRESENTATION IN RESPECT OF
EMERGING WARRINGTON LOCAL
PLAN VIABILITY ASSESSMENT
AUGUST 2021**

November 2021



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- A Appraisal – Illustrative Masterplan
- B RLB Cost Report
- C SWUE 300 Unit Appraisal

1 Executive Summary

Overview

CBRE has been appointed by Peel L&P Holdings (UK) Limited ('Peel') to provide a consultation response to the published Emerging Local Plan Viability Assessment August 2021 which has been prepared for Warrington Borough Council ('the Council' or 'WBC') by Cushman & Wakefield ('C&W').

CBRE is particularly concerned that the potential for both overall delivery, and affordable housing delivery, is called into question by the conclusion of the LPVA that town centre and low value housing delivery is not viable even at nil affordable housing provision.

CBRE determines that there is insufficient flexibility in the WBC Updated Proposed Submission Version Local Plan ('UPSVP') to accommodate the reported lack of viability. The need for additional viable sites for housing delivery must be recognised and reflected in UPSVP in order to provide sufficient housing land supply.

Technical Issues - Summary

The primary technical issues with the LPVA, as identified by CBRE, are set out in summary as follows:

- **Site Allocations:** The LPVA adopts coverage at 15 units per acre and 15,570 sq ft/net acre for the South East Warrington Urban Extension ('SEWUE'). This is regarded as excessive, considering that this site is assessed as the highest value location in Warrington. Whilst the Council is seeking for a range of house types and unit types to be provided, purchaser expectations in this location must be assumed to generate a requirement for larger than average homes and gardens. The use of an excessive density will increase the level of viability of the SEWUE scheme beyond that which is anticipated to be achievable and it is essential that the Local plan is assessed on the basis of deliverable assumptions which match purchaser and developer market expectations.
- **Garages:** Garage costs are included within the 15% of base build cost allowance for external works. House builders will assess the cost of garages separately from base build and external works, and the 15% external works allowance is insufficient to accommodate garage costs. A separate garage cost is requested.
- **Energy Requirements:** Building Regulations Part L costs of £3,130 - £4,847 per plot are stated to be included within the adopted build/contingency/ professional fees costs. This approach is regarded as unevidenced and unreasonable, inflating viability to unachievable levels. The Council is requested to ensure that costs relating to revised government requirements is appropriately modelled within Local Plan viability testing.
- **Site-Specific Infrastructure/Abnormal Costs:** A breakdown of the Site-Specific Infrastructure/Abnormal Costs is stated to be provided in the Council's Infrastructure Delivery Plan ('IDP'). However, no clarity is provided within the Council's IDP and greater detail in respect of required infrastructure/abnormal costs is requested.
- **Benchmark Land Values:** The assessed benchmark land values are regarded as reflecting absolute minimum levels, with any reduction for additional infrastructure/abnormal costs creating a severe risk that a landowner would not be sufficiently incentivised to release their land.
- **Conclusions and Recommendations:** Housing delivery in the lower value areas of Warrington (Town Centre, Inner Warrington North, Suburb Low Value and Settlement Low Value) are assessed as not currently viable to support full policy requirements and development in these locations must be anticipated to be limited, even with Homes England or other public funding support.

1 Executive Summary

Any Local Plan development delivery that is reliant upon grant funding is not regarded as sound as it is not consistent with NPPF requirements¹, where deliverable sites need to be shown to be viable.

The Council is requested to consider the inclusion of additional viable sites within the UPSVLP to ensure that the planned level of Local Plan delivery can be achieved.

¹ MHCLG National Planning Policy Framework 20 July 2021: Paragraph 58

2 Introduction

PURPOSE

- 2.1 This representation has been prepared by CBRE and is submitted on behalf of Peel L&P Holdings (UK) Limited ('Peel'). Peel is one of the leading infrastructure, real estate and investment enterprises in the UK.
- 2.2 CBRE has substantial experience of preparing viability appraisals in support of a wide range of development proposals throughout the UK. The representation also reflects Peel's knowledge of market conditions through ongoing engagement and negotiations with landowners and developers across the region and nationally, along with knowledge generated by Peel's house building business, Northstone.
- 2.3 This document sets out Peel's representation on the published LPVA which has been prepared by C&W and which forms part of the evidence base for the UPSVLP.
- 2.4 The published LPVA documents comprise the 151 page main Report and a separate Appendices document containing 18 appendices over 118 pages.
- 2.5 LPVA paragraph 1.6 states that the *"purpose of this LPVA is to assess the total cumulative impact of all relevant emerging policies within the Local Plan to determine whether the plan is viable and deliverable, and to therefore inform the setting of plan policy."* The LPVA forms an important part of the evidence base which supports the UPSVLP.
- 2.6 Peel has previously provided representations in respect of: the Local Plan Viability Assessment Appraisal Inputs June 2018; the Local Plan Viability Assessment March 2019, as prepared by BNPPRE; and the Local Plan Viability Assessment – Supporting Consultation Note, as prepared by C&W in February 2020.
- 2.7 Discussions have been held with the Council in respect of the deliverability of the South West Urban Extension ('SWUE') site, within which Peel holds land interests.
- 2.8 The SWUE site, comprising c.1,783 dwellings, a local centre and, potentially, a school has been withdrawn from the sites that are allocated within the UPSVLP 2021-2038. UPSVLP paragraph 3.3.17 states that the SWUE *"did not perform as well as the chosen spatial strategy. In particular, the South West Urban Extension would not enable the brownfield regeneration benefits of Fiddlers Ferry or such wide ranging infrastructure benefits as the South East Warrington Urban Extension."*
- 2.9 UPSVLP Policy DEV1 – Housing Delivery proposes the delivery of a minimum of 14,688 new homes between 2021 and 2038 (average of 816 homes per annum).
- 2.10 The UPSVLP does not set out levels of housing delivery for specific areas, but at paragraph 3.3.7 does state that *"The existing urban area can accommodate around 11,800 new homes. This means there is the requirement to release Green Belt land for around 4,500 homes in order for the Council to meet its housing requirement. The detailed land requirement calculation is set out in Policy DEV1."*
- 2.11 UPSVLP paragraph 2.1.2 states that *"The Borough comprises the main urban area of Warrington, surrounding by a rural hinterland which includes a number of distinct settlements."* The urban area includes locations of higher value, but the majority is low to mid value, including the town centre and it must be assumed that significant levels of delivery are proposed within the lower value locations.
- 2.12 The lack of viability that is evidenced within the LPVA for town centre and low value locations must be fully acknowledged by the Council and sufficient viable residential sites must be identified and allocated.

3 Representation

- 3.1 This representation sets out Peel’s detailed comments on the LPVA report and appendices, which are the primary documents to be used to inform the level of viability and deliverability of sites in Warrington.
- 3.2 The representations are arranged according to the relevant document and section/paragraph numbers. Requests and recommendations to introduce modifications to the LPVA to reflect market expectations and determine appropriate levels of viability are stated under a series of subject specific headings drawing titles from the LPVA.

VIABILITY IN PLAN-MAKING

- 3.3 The Government published its most recent amendments to the revised National Planning Policy Framework (‘NPPF’)² on 20 July 2021 and updated National Planning Practice Guidance for Viability (‘PPGV’)³ in September 2019. Both the NPPF and PPGV include an up-to-date position on the Government’s intended role for viability assessment, the methodology, and procedures expected of all stakeholders in the preparation of such evidence.
- 3.4 PPGV Paragraph 010⁴ concisely defines the Government’s objective for the role to be played by viability within the planning system:
- “In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission.”*
- 3.5 PPGV is clear that the role for viability assessment is primarily at the plan making stage. Paragraph 002 confirms that the process must be inclusive and undertaken over several stages:
- “Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers.”*
- 3.6 In addition, PPGV Paragraph 002⁵ states that policies introduced to the plan should be realistic and deliverable.
- 3.7 PPGV Paragraph 020⁶ confirms that the inputs and findings of any viability assessment should be set out in a way that aids clear interpretation and interrogation by decision makers.

LPVA Chapter 1 – Executive Summary

- 3.8 The LPVA Executive Summary provides a thorough breakdown of assumptions adopted for generic and allocated site testing along with results and sensitivity testing.
- 3.9 Where applicable, comments will be provided within later paragraphs in respect of the adopted assumptions.

² MHCLG National Planning Policy Framework (‘NPPF’) (as amended in July 2021)

³ MHCLG Planning Practice Guidance for Viability (‘PPGV’) (as amended in September 2019)

⁴ MHCLG Planning Practice Guidance: Viability September 2019 Paragraph: 010 Reference ID: 10-010-20180724

⁵ MHCLG Planning Practice Guidance: Viability September 2019 Paragraph: 002 Reference ID: 10-002-20190509

⁶ MHCLG Planning Practice Guidance: Viability September 2019 Paragraph: 020 Reference ID: 10-020-20180724

3 Representation

- 3.10 Generic testing is carried out on schemes of three sizes: 10; 50; and 250 units in four locations: Town Centre; Inner Warrington; Suburb ; and Settlement. However, the locations are further split to provide a total of 11 locations driven by sales value assessment and development type (for sale or BTR).
- 3.11 All development in Town Centre, Inner Warrington North and Suburb Low Value locations are assessed to be unviable (except for Suburb 3 Low Value which is assessed as marginal).
- 3.12 Town centre development is also shown to be unviable when sensitivity tested with nil affordable housing, and 250 unit development is unviable even with a nil affordable, a 10% increase in sales values, and a reduction in both contingency and professional fees.
- 3.13 The Site Allocations are shown to be viable except for Waterfront and Peel Hall. Sensitivity testing of the Waterfront and Peel Hall sites improves viability, requiring increases in sales values and reductions in contingency, professional fees and profit level before the sites can be shown to be fully viable.
- 3.14 The UPSVLP provides no clarity in respect of the number of dwellings that are anticipated to be delivered in town centre or Inner Warrington North locations. However, the recently prepared Town Centre Masterplan articulates the vision for the Town Centre with the addition of the Waterfront area (1,070 dwellings). This has been prepared separately to the Local Plan and covers a longer time period out to 2040, but envisages the delivery of 8,000 new homes within the area. Peel Hall delivery is proposed at 1,200 dwellings⁷.
- 3.15 Delivery in these areas must be expected to be limited, in line with the LPVA results and the conclusion at LPVA paragraph 9.13 that housing delivery in these areas will be “challenging” when assessed in line with the Council’s full policy requirements and Town Centre development is shown to be unviable with nil affordable housing.
- 3.16 The lack of viability for the delivery of a significant portion of dwellings in the town centre and low value areas indicates that the planned delivery of 14,688 new homes in the UPSVLP period will not be possible without the addition of further viable development sites.
- 3.17 LPVA paragraph 1.84 states that additional flexibility should be introduced into IPSVLP Policy INF5 to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific FVA, that development would not be financially viable if full planning obligations were sought. Peel acknowledge that the UPSVLP does include revised wording in line with the LPVA, which is regarded as acceptable.
- 3.18 LPVA paragraph 1.108 concludes that “current policy drafting provides sufficient flexibility to enable development to come forward through a relaxation in policy requirements where appropriately justified on viability grounds”. However, this conclusion is not proven in the LPVA, with town centre schemes requiring nil affordable housing provision, increases in sales values and reductions in costs to be shown to be viable, and larger town centre schemes remain unviable even with these amendments.
- 3.19 The Waterfront and Peel Hall sites are not tested at nil affordable housing, and the adopted sensitivity adjustments to sales values, contingency, professional fees and developer’s profit are not regarded as a reasonable indication of viability, with adjustments to affordable housing policy provision required before making adjustments to market expectations.

⁷ It is acknowledged that the Secretary of State has granted outline planning permission for the Peel Hall scheme, but deliverability of this scheme is regarded as challenging, in line with the findings of the LPVA.

3 Representation

- 3.20 It is not possible to determine the viable level of housing delivery in Warrington based on the results of the LPVA. Peel request clarity in respect of the amount of planned residential delivery in those locations which are assessed as unviable.

LPVA Chapter 5 – Methodology

- 3.21 C&W carried out consultation on draft appraisal assumptions in January 2020. Peel submitted a representation and responses to the representation are provided at LPVA Appendix 2.
- 3.22 The responses are regarded as acceptable except for the inclusion of garage construction costs within the 15% of base build allowance for external works.
- 3.23 House builders will regard garage construction costs as separate from their external works costs. A 15% allowance is regarded as a minimum, with 20% more in line with market expectations.
- 3.24 The inclusion of garage costs within the external works allowance improves viability beyond achievable levels and amendment to this assumption is regarded as necessary.
- 3.25 LPVA Appendix 2 clearly states that Western Link Road ('WLR') costs are not included in the adopted Strategic Infrastructure Costs ('SIC').
- 3.26 Previously, it was proposed that a proportion of the £70m WLR funding deficit would be sought by the Council through the site allocations in the Local Plan, but no methodology for the assessment of WLR contributions was proposed by the Council.
- 3.27 WLR contributions hold the potential to negatively impact on viability and it is essential that WLR S106 contributions are appropriately assessed and applied at a viable level, ensuring no double counting of costs when compared with other strategic infrastructure works on the allocated sites.
- 3.28 The LPVA makes no reference to the WLR and confirmation of the proposed approach to WLR delivery is requested.

LPVA Chapter 7 – Development Typologies and Viability Appraisal Assumptions

Development Typologies

- 3.29 The LPVA adopts generic testing of residential developments sites delivering: 10; 50; and 250 dwellings, and site specific viability assessments for allocated sites. The adopted approach is regarded as reasonable.
- 3.30 The generic testing is split into four spatial 'zones', as shown on the map at LPVA Figure 7.1. The wording on Figure 7.1 is blurred and not readable, and higher resolution mapping is requested to aid understanding of the adopted approach.

Assumed Hypothetical Scheme Characteristics

Site Allocations

- 3.31 LPVA paragraph 7.35 states *"In our experience, residential schemes in higher value areas typically comprise lower density, larger unit schemes characterised by a greater proportion of detached house types in line with market demand in these locations."*
- 3.32 Development coverage for those sites which do not include apartments range from 14,088 sq ft/net acre to 15,682 sq ft /net acre.
- 3.33 Development coverage at 14,250 – 15,250 sq ft/net acre is regarded as appropriate for developments of scale, with higher densities and smaller unit sizes likely to be adopted in lower value areas and those with the highest infrastructure burdens, leading to variation between sites. CBRE is aware that

3 Representation

- higher development densities are adopted to improve viability where constraints require such intervention.
- 3.34 The LPVA adopts coverage at 15 units per acre and 15,570 sq ft per net acre for the South East Warrington Urban Extension ('SEWUE') and 15,682 sq ft/net acre for Peel Hall.
- 3.35 These sites are at the opposite end of the assessed sales value range, with SEWUE at £3,552/sq m and Peel Hall at £2,582/sq m a difference of £970/sq m (£90/ sq ft).
- 3.36 The coverage assumption for SEWUE conflicts with the LPVA statement at paragraph 7.35, with little reasoning provided for the higher level of density assumed for SEWUE other than due to the scale of the scheme *"is anticipated that a greater diversity of house types and unit sizes are likely to be provided. We also understand that the Council will be seeking a wider mix on this site to cater for a broader range of purchasers, together with ensuring efficient use of the large Green Belt allocation."*
- 3.37 Unit size assumptions for SEWUE are reduced in comparison with other high value locations and provision of 5% 5 bed houses are reduced to nil, with 2 bed houses increased from 15% to 20%.
- 3.38 The assessed sales values for SEWUE are £161/sq m (£15/sq ft) higher than Lymm and £646/sq m (£60/sq ft) higher than Croft, Culcheth and Thelwall Heys. The other highest value locations are assessed at a development coverage of 14,088 sq ft/acre or 14,655 sq ft/acre.
- 3.39 Details of comparable development sites are provided at LPVA Appendix 3. Whilst LPVA paragraph 7.39 references the Orchard Meadows, Appleton Thorn development by Barratt David Wilson Homes, at a site density of 15.15 units per acre and c.15,500 sq ft per net acre, this is countered by the Hawthorn Grove, Appleton Thorn development by Bloor Homes at 13.55 units per acre and 13,480 sq ft per net acre.
- 3.40 There are very limited details of other schemes in high value areas of Warrington, with Sandstone Brook, Lymm at 12.9 units per acre and 13,533 sq ft per net acre, Astor grange, Grappenhall Heys by Rowland Homes at 10.5 units per acre and 14,056 sq ft per net acre, and Culcheth green by Elan Homes at 8.57 units per acre and 14,926 sq ft per net acre.
- 3.41 LPVA Appendix 3 also provides evidence from seven sites in other north west high value locations, with densities ranging from 10.47 to 13.08 units per acre and 13,108 to 15,607 sq ft per net acre, with only one site over 15,000 sq ft per net acre. The average density from these seven sites is 14,321 sq ft per net acre.
- 3.42 Whilst it may be possible to comply with the Council's expectation that the SEWUE will cater for a broader range of purchasers, it is not regarded as appropriate to increase the development coverage as general purchaser expectations in this highest value location will be for larger units with good-sized gardens.
- 3.43 A development density equating to 14,651 sq ft/acre, in line with the density adopted for the schemes in the Croft, Culcheth, Thelwall Heys and Lymm high value areas.
- 3.44 The SEWUE site is subject to increased levels of infrastructure costs when compared with other high value developments and, whilst it may be anticipated that a higher level of density will be adopted in order to improve viability, purchaser expectations must taken into account and an increase to 15,250 sq ft per net acre is regarded as a reasonable maximum level of development density.
- 3.45 The adopted development density will increase the level of viability of the SEWUE scheme beyond that which is anticipated to be achievable and it is essential that the Local plan is assessed on the basis of deliverable assumptions which match purchaser and developer market expectations.

3 Representation

- 3.46 Allocated sites are assessed on the basis of a 300 unit scheme, with infrastructure and other costs applied on a pro-rata basis in comparison to the whole scheme. This approach simplifies matters, but is regarded as reasonable.

New Build Evidence Update – April 2021

- 3.47 Sales values were originally assessed in December 2019/January 2020 and Halifax Price Index information has been reviewed in order to establish an average house price growth rate from December 2019 to February 2021. This is stated at LPVA paragraph 7.91 to be approximately 9%, but is stated to be based on a small sample size.
- 3.48 LPVA paragraph 7.95 states that new build values have been assessed at the local new build sites and evidence is provided at LPVA Appendix 5.
- 3.49 The average uplift is stated at 1-5%, with an overall increase identified at 5.68%.
- 3.50 Following consideration of updated resale evidence, an uplift of 5% is applied to the values assessed in December 2019/January 2020.

The level of value uplift and range of comparable evidence is regarded as reasonable.

Cost Assumptions

- 3.51 The cost assumptions that are adopted in the LPVA generic and allocated site appraisals are in line with those adopted in the C&W Warrington Local Plan Viability Assessment – Consultation Note January 2020 ('LPVA-CN'), updated to the current assessment date.
- 3.52 The adopted cost assumptions were reviewed within the Consultation Note consultation period, ending February 2020 and were found to be generally reasonable and acceptable except for the following issues, which remain of concern.

Garages

- 3.53 Integral and detached garages are stated within LPVA paragraph 7.187 to fall within the definition of standard build costs. This is accepted, but garage costs are not classed by house builders as either house build or external works. They sit as a separate cost which must be appropriately assessed.
- 3.54 LPVA paragraph 7.206 states that garage costs are included in the 15% of base build costs allowance for external works.
- 3.55 Garage costs were stated to fall outside standard house build and external works costs within the LPVA-CN consultation response by Peel. In response, LPVA Appendix 2 states *"The assumed 'all in' standard build cost figures are considered reasonable to cover the costs of providing garages."*
- 3.56 No evidence is provided within the LPVA to confirm that garage costs can be included within the external works allowance.
- 3.57 A 15% external works allowance is regarded as an absolute minimum, with many national house builders pushing closer to 20% of base build costs and there is no scope to include the additional garage costs within external works allowances.
- 3.58 A cost allowance is requested for the construction of garages at the following rates, in line with our understanding of current costs: £5,000 for integral garages; £8,000 for single detached; and £15,000 for double detached.
- 3.59 It is essential that an appropriate garage provision is modelled for each site, with a higher percentage of units being allocated garage provision within higher value areas when compared to lower value areas.

3 Representation

Energy Requirements

- 3.60 LPVA paragraph 7.239 states that no cost allowance has been made for compliance with new Part L Building Regulations standards on the basis that *“there is sufficient headroom in the standard build cost assumptions to meet this cost, particularly when combined with the 5% contingency and 7% professional fees allowances”*.
- 3.61 The new Part L regulations are to be introduced from June 2022 and will not be included in the adopted BCIS cost data. The adopted contingency rate is regarded as reasonable, and the professional fees allowance of 7% is a minimum allowance, especially for schemes of significant scale, where fees will increase above standard allowances.
- 3.62 The inclusion of Part L cost of £3,130 - £4,847 per plot within the adopted build/contingency/professional fees costs, as stated at LPVA paragraphs 7.237-7.238, is regarded as unevidenced and unreasonable.
- 3.63 The Council is requested to ensure that costs relating to revised government requirements is appropriately modelled within Local Plan viability testing.
- 3.64 The currently adopted approach will inflate viability to unachievable levels.

Site-Specific Infrastructure/Abnormal Costs

- 3.65 Total strategic infrastructure/abnormal costs are applied to four allocated sites, with costs applied following dialogue with the relevant stakeholders of each allocation.
- 3.66 LPVA paragraph 7.255 states that a *“breakdown of the costs is provided in the Council’s Infrastructure Delivery Plan. (‘IDP’)”*
- 3.67 No clarity is provided by the Council’s IDP. For example, the South East Warrington Employment Urban Extension and Employment Location are separated within the LPVA, but no reference is made to the Employment Location within the IDP. Also, costs are shown to be payable by: developer contributions; a mix of developer and WBC; or are not stated. It is not possible to cross check the adopted costs with those set out within the IDP.
- 3.68 Greater clarity in respect of required infrastructure/abnormal costs is requested to ensure that those sites which are reliant upon such costs have been accurately assessed.
- 3.69 Within the adopted 300 unit assessments, the costs have been applied on a pro-rata basis, with the total cost divided by the total number of proposed dwellings. The costs are applied on a weighted cash flow approach.
- 3.70 No details of the weighting that is applied has been provided, and greater clarity in this regard is requested to ensure that the modelling can be fully understood, to ensure that the adopted approach is reasonable, and to reduce the potential requirement for site reappraisal, as referenced at LPVA paragraph 7.265.
- 3.71 C&W has not verified/checked the adopted costs, and C&W recommend that the Council undertakes due diligence and engagement with site promoters to ensure that the adopted costs are realistic.
- 3.72 On this basis, the above request for additional information to evidence the anticipated costs hold a high level of importance.

Section 106 Contributions

- 3.73 Costs are applied in line with information provided by the Council.
- 3.74 LPVA paragraph 7.287 states that SEWUE is assessed with additional contributions towards off-site motorway works, but no further information is provided.

3 Representation

3.75 Clarity is requested to ensure that it is possible to check that all sites are assessed on an appropriate basis.

Benchmark Land Values

3.76 Site allocations are assessed with benchmark land values ('BLV') equating to £150-350,000 per net acre, taking into account the value area in which each site is located, and the level of abnormal costs affecting each site.

3.77 The SEWUE is assessed with a lower BLV (£250,000 per net acre) than two sites in Lymm (£350,000 per net acre) despite the SWUE site being in a higher value location. Strategic infrastructure/abnormal costs are applied at £127,098,920 to the SWUE site whereas the Lymm sites have no such costs applied. Therefore, the reduction in BLV can be justified.

3.78 The adopted BLVs are regarded as minimum assessment, leaving no scope for reduction if abnormal costs are assessed at higher levels than those adopted in the LPVA.

3.79 LPVA paragraph 7.428 states that BLVs would need to flex if abnormal costs are higher than provisionally assumed in the LPVA. LPVA paragraph 7.429 does, however, state *"that there is a land value tipping point beyond which the land value cannot reduce otherwise the landowner will not be sufficiently incentivised to release their site for development."*

3.80 The assessed BLVs are regarded as being at the tipping point, with no scope for reduction without a severe risk that a landowner would not be sufficiently incentivised to release their land.

3.81 Any reduction in the proposed BLVs would be regarded as highly inappropriate and unviable.

3.82 BLVs must be fixed, and any increase in costs, from those set out in the LPVA must be anticipated to generate a requirement for site specific viability assessments upon submission of planning applications. In accordance with PPGV, the Council must ensure recourse to site specific viability assessment at the application stage is appropriately reflected in emerging Local Plan policies.

Viability Assessment Results

3.83 LPVA paragraph 8.5 sets out a summary of generic typology testing results, and these are summarised in LPVA paragraph 8.6, which states that the *"base testing results indicate that the majority of the typologies in the lower value areas of Warrington (Town Centre, Inner Warrington North, Suburb Low Value and Settlement Low Value) are not viable based on full policy requirements."*

3.84 The Waterfront and Peel Hall strategic sites generate viability deficits when assessed with full policy costs.

3.85 A range of sensitivity testing is provided within the LPVA, with town centre, most inner Warrington and build to rent development remaining unviable with reductions in contingency, professional fees and profit level. Town centre development remains unviable with nil affordable housing and, for the largest schemes, also with increased sales values, reduced contingency and reduced professional fees.

3.86 A 10% increase in sales values is required for Peel Hall to become viable, with Waterfront remaining in a marginal position with a similar increase.

3.87 The reliance upon sensitivity testing to improve viability results is not regarded as a reasonable approach for the creation of a sound plan and delivery must be supported by a sufficient level of deliverable and viable sites.

Conclusions and Recommendations

3.88 LPVA paragraph 9.9 again states that *"the results of the base testing for the generic typologies indicate that the majority of the sites in the lower value areas of Warrington (Town Centre, Inner Warrington*

3 Representation

North, Suburb Low Value and Settlement Low Value) are not currently viable to support full policy requirements.”

- 3.89 The UPSVLP provides no clarity in respect of the number of dwellings that are anticipated to be delivered in the areas that are assessed as unviable, but delivery must be expected to be limited in these locations, in line with the LPVA results and the conclusion at LPVA paragraph 9.13 that housing delivery in these areas will be “challenging” when assessed in line with the Council’s full policy requirements. Large scale Town Centre development is shown to be unviable with nil affordable housing.
- 3.90 LPVA paragraphs 9.17 and 9.18 make reference to the potential need for Registered Providers to provide housing with the support of Homes England grant funding or public sector funding support.
- 3.91 Any Local Plan development delivery that is reliant upon grant funding is not regarded as sound as it not consistent with NPPF requirements⁸, where deliverable sites need to be shown to be viable.
- 3.92 The Council is requested to consider the inclusion of additional sites to ensure that the planned level of Local Plan delivery can be achieved.

Warrington South West Urban Extension

- 3.93 As referenced earlier in this document, Peel holds land interests in the SWUE site. The SWUE was proposed for allocation in the previous version of the Warrington Local Plan, but has been removed from the current version, with UPSVLP paragraph 11.1.4 stating that the SWUE “*was given further detailed consideration, but options including this urban extension did not perform as well as the chosen spatial strategy. In particular, the South West Urban Extension would not enable the brownfield regeneration benefits of Fiddlers Ferry or such wide ranging infrastructure benefits as the South East Warrington Urban Extension. The Council also has concerns about the potential impact on the Western Link.*”
- 3.94 The current spatial strategy is dependent upon development in locations that the Council’s viability evidence shows to be unviable, and Peel regards it as necessary for the SWUE to be allocated in order to address the deficiency in supply which must be assumed to result from the lack of viability of town centre and low value development in Warrington.
- 3.95 CBRE has been instructed to carry out a viability assessment of the SWUE.
- 3.96 The assessment has been carried out on the same assumptions as adopted within the LPVA, with the appraisal being based on a hypothetical scheme comprising 300 units, with strategic infrastructure costs applied on a pro-rata basis.
- 3.97 Most of the main appraisal assumptions are fixed, in line with those adopted in the LPVA.
- 3.98 Areas of variation relate to site specific factors as follows: unit mix; unit sizing; development density; sales value; infrastructure costs; and S106 contributions.

⁸ Ibid Page 4

3 Representation

The adopted unit mix is as follows:

Accommodation Type	Accommodation Mix	Units
2 bed	20%	60
3 bed	40%	120
4 bed	35%	105
5 bed	5%	15

3.99 The accommodation mix is very similar to that adopted in the LPVA for the SEWUE except for the inclusion of 5 bed homes, which are regarded as necessary in this location.

3.100 All 2 bed units are assumed to provide affordable accommodation and

The adopted unit sizing is as follows:

Accommodation Type	Unit Size (sq ft)
2 bed	775
3 bed	950
4 bed	1,300
5 bed	1,650

3.101 The unit sizing has been assessed in line with our understanding of market delivery, supported by analysis of the new build scheme information provided at LPVA Appendix 3 where average unit sizes are as follows:

Accommodation Type	Average Size (sq ft)	Number of Schemes Assessed
2 bed	665	22
3 bed	952	28
4 bed	1,325	28
5 bed	1,780	13

3.102 A development density of 35dph has been applied, in line with the current Illustrative Masterplan, as attached at **Appendix A**.

3.103 The development coverage equates to 15,187 sq ft per net acre, reflecting that the site is impacted by site specific infrastructure costs.

3.104 Sales values for the SWUE site are not provided in the LPVA, but were included in the LPVA-CN January 2020 at £280 psf, based on evidence available at that time, and as repeated in the LPVA.

3.105 LPVA paragraph 7.113 states "Based on our analysis of the evidence, including the updated new build and re-sale data, we consider that a reasonable increase to the sales values adopted in our 2020 analysis would be in the order of 5% for the purposes of the sales value uplift from December 2019 / January 2020."

3.106 Therefore, an uplift of 5% has been applied to the LPVA-CN average value, generating a current average of £294 psf.

3.107 It is anticipated that sales values on the SWUE site will be highest to the east, with the easternmost parcel, situated to the south of the A56 generating increased values in comparison to the remainder of

3 Representation

the site due to its adjacent location to existing residential properties in Walton and within walking distance of the facilities available in Stockton Heath.

3.108 The remainder of the site is separated from Walton by the A56 and will be regarded as a new residential location for which a new pricing profile will need to develop and it is anticipated that values will be at a significantly reduced level when compared with Walton.

3.109 The market sale schedule is set out below:

Accommodation Type	Average Sqft	Accommodation Mix	Total Units	Total sq ft	MV Units	MV sq ft	MV £psf	MV Total Value
2 bed	775	20%	60	46,500	15	11,625	294	3,417,750
3 bed	950	40%	120	114,000	75	71,250	294	20,947,500
4 bed	1,300	35%	105	136,500	105	136,500	294	40,131,000
5 bed	1,650	5%	15	24,750	15	24,750	294	7,276,500
TOTAL			300	321,750	210	244,125	294	71,772,750

3.110 The affordable housing value schedule is set out below:

Accommodation Type	Affordable at 30%	AR Units	AR sq ft	AR Value £psf	AR Total Value	Int Units	Int sq ft	Int Value £psf	Int Total Value
2 bed	45	30	23,366	147	3,434,839	15	11,509	198	2,283,911
3 bed	45	30	28,643	147	4,210,448	15	14,108	198	2,799,633
TOTAL	90	60	52,009		7,645,286	30	25,616		5,083,545

3.111 Affordable values are applied at 50% of MV for affordable rent and 67.5% of MV for intermediate tenure, in line with the LPVA assumptions.

3.112 Strategic infrastructure costs are applied in line with the Cost Report dated 10 November 2021 as prepared by Rider Levett Bucknall. This is an update from the Cost Report dated 1 March 2019 which was discussed at that time with the Council.

3.113 A copy of the current Cost Report is attached at **Appendix B**.

3.114 S106 costs are applied with reference to those adopted in the LPVA. The SWUE site is expected to be required to provide higher contributions than the smaller strategic sites, for which contributions average at c. £11,000 per plot and lower than SEWUE at c. £15,000 per plot. A S106 allowance of £12,500 per plot has been applied to SWUE.

3.115 The benchmark land value ('BLV') for the SWUE site is assessed at £220,000 per net acre, which equates to £100,607 per gross acre. An allowance of £100,000 per gross acre is regarded as an absolute minimum allowance for a strategic site that is impacted by infrastructure costs. Below this level, there will be insufficient incentive for the landowner to release the land for development.

3.116 A £220,000 BLV falls slightly below that which is adopted in the LPVA for the SEWUE site, reflecting the lower sales values that are assessed as achievable on the SWUE site in comparison to SEWUE.

3.117 On the basis of a development density of 14.16 units per acre (35 dph), the net developable area of the 300 unit site is assessed at 21.19 acres, generating a BLV of £4,661,017.

3.118 The SWUE 300 unit viability appraisal and cashflow are attached at **Appendix C**.

3.119 The residual land value generated by the assumed 300 unit scheme is £4,726,082.

3.120 The residual land value exceeds the BLV, indicating that the scheme is viable and could make a financial contribution to the Warrington link road.

3 Representation

3.121 It is anticipated that scheme viability will improve upon site specific viability assessment once the development planning is further progressed.

APPENDICES




A Appraisal – Illustrative Masterplan



KEY:

-  Site boundary
-  Local Authority Boundary
-  Proposed Green Belt
-  Existing vegetation
-  Proposed trees and woodland
-  Proposed development cells
-  Proposed development to be no higher than 2 storey along A56
-  Potential locations for a school (A or B)
-  Proposed play area
-  Potential location for retail / local centre
-  Proposed primary road
-  Proposed secondary / tertiary roads
-  Proposed public open space
-  Proposed allotments
-  Existing Public Right of Way
-  Proposed footpath
-  Proposed cycleway with existing residential access retained
-  Proposed route of western link road
-  Gas pipeline and easement
-  Proposed vehicular access points

HSE Consultation Zones

-  Inner Zone (50m)
-  Middle Zone (65m)
-  Outer Zone (100m)

- Total site area: 119.59 ha / 295.52 ac
- Total existing properties within red line: 6.37 ha / 15.74 ac
- Total existing roads within red line (A56/Runcorn Road): 1.80 ha / 4.45 ac
- Total proposed spine road corridor within red line (outside development cells): 2.74 ha / 6.77 ac
- Total proposed green infrastructure (all typologies): 55.82 ha / 137.93 ac

Land north of A56 and Runcorn Road:

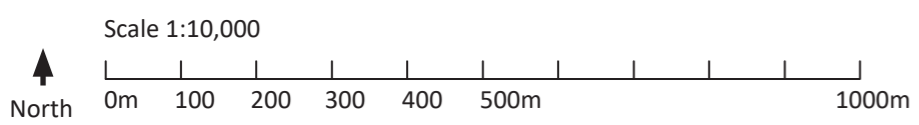
- Potential school (location to be confirmed): 1.40 ha / 3.46 ac
 - Potential retail/local centre: 0.50 ha / 1.24 ac
 - Residential development: 41.15 ha / 101.68 ac
 - Residential development within Solvay Interlox Ltd outer zone: 13.50 ha / 33.36 ac (up to 473 units @ 35/ha)
 - Residential development within Solvay Interlox Ltd middle zone: 0.86 ha / 2.13 ac (up to 30 units @ 35/ha)
 - Residential development within former Norbert Dentressangle outer zone: 6.70 ha / 16.56 ac (up to 235 units @ 35/ha)
- units @ 35 units per ha: 1440**

Land south of Runcorn Road:

- Residential development: 5.53 ha / 13.66 ac
- units @ 35 units per ha: 194**

Land south of A56 Chester Road:

- Residential development: 4.28 ha / 10.57 ac
 - Residential development within Solvay Interlox Ltd outer zone: 0.47 ha / 1.16 ac (up to 16 units @ 35/ha)
- units @ 35 units per ha: 149**
- Total units across whole site @ 35 units per ha: 1783**



NB: Masterplan subject to change following detailed survey work



Warrington Local Plan Sites
South West Urban Extension
Illustrative Masterplan and
development constraints

Drwg No: 630DE-13M Date: 11.06.2018
 Drawn by: AH Checker: SR
 Rev by: SB (10.11.21) Rev checker: DL
 QM Status: Checked Product Status: Issue
 Scale: 1:10,000 @ A3

B RLB Cost Report

REPORT

10 NOVEMBER 2021

COST REPORT NUMBER ONE, REV D

SW WARRINGTON URBAN EXTENSION

PEEL INVESTMENT (NORTH), STORY HOMES & ASHALL HOMES

Prepared By

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5 COST SUMMARY

AUTHORISATION

This report has been prepared by:

Signature.....
Liam Bickley

and authorised for issue by:

Signature.....
Paul Beeston

1. EXECUTIVE SUMMARY

1.1 Status of Costs

This report is based on the emerging masterplan for the South West Urban Extension of Warrington. It includes strategic infrastructure. The primary purpose of the report is draw together information that has been prepared to date for the scheme. The design of the project is generally reflective of preliminary work prior to an Outline Planning Application, and as such carries a relatively high level of risk.

1.2 Cost Summary

By cost heading	Cost £	£ / SF	£ / Unit	£ / Acre
Section 106 Contributions	0	0.00	0	0
Strategic Off Site Works	10,166,541	0.00	5,495	83,606
Strategic On Site Works	26,012,337	0.00	14,061	213,917
TOTAL	36,178,877	0.00	19,556	297,523

2 PROJECT INFORMATION

2.1 Project Team

Client	Peel Investment (North), Story Homes & Ashall Homes
Masterplanner	Randall Thorpe
Quantity Surveyor	Rider Levett Bucknall
Utilities Assessment	TDS
Planning Consultant	Turley
Viability	CBRE

2.2 Background

This report has been prepared based on early design information being prepared to progress the masterplanning of the site prior to the site being adopted in the Local Plan.

2.3 Description of the Works

Strategic Land site including infrastructure.

3 BASIS OF REPORT

3.1 Purpose and Status of Report

This report has been prepared to provide a preliminary cost estimate for the project.

3.2 Basis of Procurement

The costs assume that competitive tenders are obtained for the works.

3.3 Programme

All costs are reported on a current day basis (4Q21) with no provision for inflation.

3.4 Information Used

3.4.1 Generally

Drawings as listed in the cost plan

Randall Thorp Drawing 630DE-13I

Itransport Drawing ITM 132243 - GA - 003 (For information only, does not show exact junction deta

Itransport Drawing ITM 132243 - GA - 002

Croft Drawing 2404 - F01

3.5 Specifications

Specifications are to be to be an adoptable standard for infrastructure.

3.6 Exclusions

3.6.1 *Generic Exclusions*

- Local taxes (eg. VAT)
- Land acquisition cost / Land compensation costs
- Land rental for temporary accommodation
- Restrictive Land Covenants / Ransoms / Rights of Light / Land compensation / Oversailing
- Finance
- Legal Fees
- Agency Fees
- Statutory Approval Fees (Planning etc)
- Inflation / Increase costs
- Flood defence works
- Acoustic Fences
- Archaeological watching briefs
- Marketing signage
- Off services reinforcement
- Section 106 costs
- CIL
- Landscaping maintenance / commuted sums
- Land acquisition, including for off site highway schemes
- Diverting Gas Main or grounding cables, unless noted otherwise
- On plot works, including estate roads, dwellings and abnormal foundations

3.7 Projected Increase in Costs

Base costs are reported on a current day basis.

3.8 Assumptions

Much of the report has been based on assumption at this stage. It is assumed there are a total of: 1,850 units.

SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV D - 10 NOVEMBER 2021

3.9 Reconciliation with WBC Costs (£ millions)

* Like for like with WBC scope for construction elements only

REF	DESCRIPTION	WBC ESTIMATE							DEVELOPER (RLB ESTIMATE)+J36	DIFFERENCE
		[a]	[b]	[c]	[d]	[e]	[f]	[g] = Sum [a] to [f]		
		Design	Construction	Inflation	WBC	Land	Risk	Total	Construction *	Construction *
	Highways									
H1	Internal spine road	0.654	7.411	0.000	0.000	0.563	0.296	8.924	4.561	-2.850
H2	Runcorn Road	0.151	1.994	0.000	0.349	0.693	0.069	3.256	1.511	-0.483
H3	Mill Lane	0.121	1.516	0.000	0.280	0.234	0.055	2.206	inc in H1	-1.516
	Sub-total	0.926	10.921	0.000	0.629	1.490	0.420	14.386	6.072	-4.848
	Junctions									
J1	Chester Road site access	0.303	2.580	0.000	0.701	0.166	0.088	3.839	1.163	-1.417
J2	Chester Road/Runcorn Road junction	0.359	2.310	0.000	0.829	0.143	0.075	3.715	1.200	-1.110
J3	Runcorn Road site access 1	0.193	1.819	0.000	0.446	0.119	0.063	2.640	1.057	-0.762
J4	Runcorn Road site access 2	0.193	1.819	0.000	0.446	0.119	0.063	2.640	0.899	-0.921
J5	Runcorn Road site access 3	0.193	1.819	0.000	0.446	0.119	0.063	2.640	0.899	-0.921
	Sub-total	1.242	10.349	0.000	2.868	0.665	0.350	15.473	5.218	-5.131
	Bus services									
B1	Bus gate on Internal Spine Road	0.019	0.229	0.000	0.045	0.009	0.009	0.311	0.110	-0.119
B2	New bus services	0.000	0.000	0.000	0.000	0.000	0.000	0.000	EXCL	
	Sub-total	0.019	0.229	0.000	0.045	0.009	0.009	0.311	0.110	-0.119
	Strategic Cycle routes									
SC1	Internal greenway connections	0.072	0.788	0.000	0.167	0.062	0.033	1.123	1.310	0.522
SC2	Greenway route	0.150	1.628	0.000	0.346	0.129	0.068	2.320	in SC1	
SC3	Upgrade of Bridgwater canal towpath to south of site	0.102	1.112	0.000	0.236	0.088	0.046	1.585	0.278	-0.834
	Sub-total	0.324	3.528	0.000	0.749	0.279	0.147	5.028	1.587	-0.312
	Community									
PS	Primary school	0.000	0.000	0.000	0.000	0.000	0.000	0.000	EXCL	
DC	District centre/community hub	0.000	0.000	0.000	0.000	0.000	0.000	0.000	EXCL	
OS	Open space	0.000	0.000	0.000	0.000	0.000	0.000	0.000	EXCL	
	Sub-total	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	TOTAL	2.511	25.026	0.000	4.291	2.444	0.925	35.198	12.988	-10.411
	% on Cost	10.0%		0.0%	17.1%	8.3%	2.9%			
	Per Unit Cost	1,358	13,528	0	2,320	1,321	500	19,026	7,020	-6,283
	Per Gross Acre Cost	9,259	92,264	0	15,820	9,010	3,411	129,764	47,881	-38,381
	Red items in WBC schedule "Optional Scope" & excluded		6.608					9.496	2.185	-4.423
	WBC cost as presented		18.418					25.702	10.802	-7.616

4 AREAS

PLOT	PLOT AREA		UNITS	DENSITY		AV UNIT	GIA	
	(acres)	(Ha)	Nr	DPA	DPH	SF/Unit	(SF)	(m2)
DEVELOPMENT CELLS								
RESIDENTIAL								
Outer zone	32.9	13.30	466	14.2	35.0		0	0
Middle zone	3.3	1.33	47	14.2	35.0		0	0
Balance of main site	65.5	26.51	928	14.2	35.0		0	0
South of Chester Rd	15.2	6.17	217	14.2	35.2			
Sub total	116.9	47.3	1,657	14.2	35.0	0	0	0
OTHER								
Education	3.5	1.40	0	0.0	0.0		0	0
Local centre	1.2	0.50	193	156.2	386.0		0	0
Sub total	4.7	1.90	193	41.1	101.6		0	0
TOTAL	121.60	49.21	1,850	15.2	37.6	0	0	0
GREEN INFRASTRUCTURE								
FORMAL OPEN SPACES								
Amenity open	4.6	1.88						
Allotments	4.4	1.77						
Play areas	0.2	0.10						
INFORMAL OPEN SPACES								
Existing woodland	22.0	8.90						
Proposed woodland	18.3	7.40						
Existing public right of way	0.2	0.10						
Proposed pedestrian routes	3.0	1.20						
Proposed cycle routes	1.0	0.40						
Natural & semi natural greenscape	66.0	26.69						
TOTAL	119.7	48.44						
OTHER AREAS								
Primary vehicular distribution	16.4	6.65						
Existing properties	13.5	5.47						
TOTAL	29.9	12.12						
GRAND TOTAL	271.25	109.77						

SW WARRINGTON URBAN EXTENSION

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5. COST SUMMARY

Total Cost

REF	DESCRIPTION	TOTAL COST £	COST / SF 0 SF	COST / Unit 1,850 units	COST / Acre 122 acres
A	SECTION 106 OBLIGATIONS				
	1 SECTION 106 PAYMENTS	0		0	0
	2 CIL	0		0	0
	Sub-total S106	0		0	0
B	STRATEGIC OFF SITE WORKS				
	1 ACCESS JUNCTIONS	6,001,453		3,244	49,354
	2 OFF SITE JUNCTIONS	4,165,087		2,251	34,252
	Total	10,166,541		5,495	83,606
C	STRATEGIC ON SITE WORKS				
	1 PRIMARY DISTRIBUTION ROADS	5,808,084		3,140	47,764
	2 STRATEGIC LANDSCAPING	5,122,771		2,769	42,128
	3 SERVICES	13,745,023		7,430	113,034
	4 ENVIRONMENTAL WORKS	1,179,585		638	9,701
	5 TEMPORARY WORKS	156,875		85	1,290
	Total	26,012,337		14,061	213,917
	Sub-total infrastructure	36,178,877		19,556	297,523
	TOTAL	36,178,877		19,556	297,523

SW WARRINGTON URBAN EXTENSION

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A Section 106 Obligations

£0

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
1	SECTION 106 PAYMENTS			
1.01	Education			EXCLUDED
1.02	Travel Plan Monitoring			EXCLUDED
1.03	Recreation			EXCLUDED
1.04	Public Transport			EXCLUDED
1.05	Off site highways a Included elsewhere			EXCLUDED
	SECTION 106 PAYMENTS Total			0

SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV D - 10 NOVEMBER 2021

A Section 106 Obligations

£0

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
2	CIL			
2.01	Contributions			
	a Excluded			EXCLUDED
	Sub-total			0
	CIL Total			0

B Strategic Off Site Works

£10,166,541

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
1	ENTRANCE JUNCTIONS			
1.01	J5: Runcorn Road, West			
	a New Junction; assumed staggered T junction or cross roads; un-signalled	1 item	898,790.00	898,790
1.02	J4: Runcorn Road, Central			
	a New Junction; assumed staggered T junction or cross roads; un-signalled	1 item	898,790.00	898,790
1.03	J3: Runcorn Road, East			
	a New Junction; assumed Roundabout	1 item	1,057,400.00	1,057,400
1.04	J1: A56 North Plot Access			
	a New Junction; new traffic signals and modification to existing Mill Lane	1 item	1,163,140.00	1,163,140
1.05	J0: A56 South Plot Access			
	a New Junction (Non RB solution - right turn through central reservation)	1 item	793,050.00	793,050
1.06	On Costs			
	a <i>Stage 3 safety audits</i>			incl
	b <i>Traffic Management</i>			incl
	c <i>Preliminaries</i>			incl
	d <i>Section 278 Inspection Fees</i>	8 %	4,811,170.00	384,894
	e <i>Bonding Costs</i>			excl
	f <i>Professional Fees</i>	10 %	5,196,063.60	519,606
	g <i>Contingency</i>	5 %	5,715,669.96	285,783
	ENTRANCE JUNCTIONS Total			6,001,453

B Strategic Off Site Works

£10,166,541

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
2	OFF SITE WORKS			
2.01	Improvements to Runcorn Road			
	a Improvements to Runcorn Road including minor realignment (scope undefined)	1,021 m	1,480.36	1,511,448
2.02	J2: A56 / Runcorn Road Junction			
	a Allowance for improvements to existing signalised junction; scope unknown	1 P Sum	1,200,000.00	1,200,000
2.03	A56 / Mill Lane Junction			
	a Downgrade / modify existing Mill Lane junction; scope unknown (extra over J1)	1 P Sum	100,000.00	100,000
2.04	Mill Lane Modifications / Stopping up?			
	a General allowance for length of Mill Lane	1 P Sum	250,000.00	250,000
2.05	Works to Bridgewater Canal			
	a Provisional Allowance for undefined improvements	1,750 m	158.61	277,568
2.06	On Costs			
	a <i>Stage 3 safety audits</i>			incl
	b <i>Traffic Management</i>			incl
	c <i>Preliminaries</i>			incl
	d <i>Section 278 Inspection Fees</i>	8 %	3,339,015.06	267,121
	e <i>Bonding Costs</i>			excl
	f <i>Professional Fees</i>	10 %	3,606,136.26	360,614
	g <i>Contingency</i>	5 %	3,966,749.89	198,337
	Sub-total	33%		1,103,640
	OFF SITE WORKS Total			4,165,087

SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV D - 10 NOVEMBER 2021



C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
1	PRIMARY DISTRIBUTION ROADS			
1.01	Roads and Footpaths			
	New distribution roads			
a	Vehicular road: primary	1,530 m	1,427.49	2,184,060
	Extra over			
a	Junctions: primary/primary only	9 Nr	15,861.00	142,749
b	Levels issues; localised raising levels (SAY)	5 Nr	21,148.00	105,740
c	Homezones/feature areas (SAY)	4 Nr	15,861.00	63,444
d	Structures: existing watercourses	1 P Sum	250,000.00	250,000
e	Bus stops/shelters (SAY)	4 Nr	37,009.00	148,036
	Roads and Footpaths Total			2,894,029
1.02	Drainage			
a	Highway drainage	1,530 m	31.72	48,535
b	FW runs	1,530 m	185.05	283,119
c	SW runs	1,530 m	317.22	485,347
	Drainage Total			817,000
1.03	Landscaping			
a	Highway landscaping	1,530 m	26.44	40,446
	Landscaping Total			40,446
1.04	Services			
a	Streetlighting	102 Nr	2,326.28	237,281
b	Lit bollards	31 Nr	475.83	14,751
	Services Total			252,031
1.05	Sundries			
a	Signage	31 Nr	1,057.40	32,779
b	Signage modifications (road names/directional etc)	1 P Sum	10,000.00	10,000
c	Bus Gates; scope unknown (SAY)	1 P Sum	100,000.00	100,000
	Sundries Total			142,779

C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
1.06	Preliminaries			
	a Site establishment, supervision and management	10 %	4,146,285.05	414,629
	Preliminaries Total			414,629
1.07	Contingency and Risk			
	a Design and Price Risk	2 %	4,560,914	91,218
	b Construction Contingency	3 %	4,560,914	136,827
	c Specific Provisions: Adoption remedial work	1 P Sum	100,000.00	100,000
	Contingency and Risk Total			328,046
1.08	Fees and other charges			
	Delivery Fees			
	a Professional fees on delivery	10 %	4,888,959.23	488,896
	Consents and fees			
	b Local Authority	8 %	5,377,855.16	430,228
	Fees and other charges Total			919,124
	PRIMARY DISTRIBUTION ROADS Total			5,808,084

SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV D - 10 NOVEMBER 2021



C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
2	STRATEGIC LANDSCAPING			
2.01	Strategic open space			
	<i>Allotments</i>			
a	Allotment Spaces	17,400 m2	15.86	275,981
b	Fencing	800 m	158.61	126,888
c	Car park: 30 m2 per space; full road construction	10 Nr	3,172.20	31,722
d	Signage / Power / Water	1 P Sum	40,000.00	40,000
	<i>Open spaces</i>			
e	Formal park areas	18,800 m2	31.72	596,374
f	NEAP	1 Nr	264,350.00	264,350
g	Sundries to formal park areas	1 P Sum	100,000.00	100,000
h	Landscaping allowance to existing woodland	89,000 m2	2.11	188,217
j	Proposed woodland planting	74,000 m2	5.29	391,238
k	Landscaping allowance to natural and semi-natural greenscape	266,900 m2	2.11	564,440
	Strategic open space Total			2,579,210
2.02	Recreational Routes			
d	Pedestrian footpath: works to existing route	420 m	52.87	22,205
a	Pedestrian footpath: new; 2m wide	5,800 m	105.74	613,292
c	Cycle route: 3m wide	1,350 m	158.61	214,124
e	Off site Strategic Route Connections	6 Nr	10,574.00	63,444
f	Extra over for bridges / structures	5 Nr	79,305.00	396,525
	Recreational Routes Total			1,309,590
2.03	Sundries			
a	Signage/street furniture/sundries	1 P Sum	100,000.00	100,000
	Sundries Total			100,000

C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
2.04	Preliminaries			
	a Site establishment, supervision and management	10 %	3,988,800.22	398,880
	c Road closure notices, adverts and approvals	0 item	excluded	excluded
	Preliminaries Total			398,880.02
2.05	Contingency and Risk			
	a Design and Price Risk	2 %	4,387,680.24	87,754
	b Construction Contingency	3 %	4,387,680.24	131,630
	c Specific Provisions: Adoption remedial works	1 item	50,000.00	50,000
	Contingency and Risk Total			269,384
2.06	Fees and other charges			
	a Professional Fees	10 %	4,657,064.25	465,706
	Fees and other charges Total			465,706
	STRATEGIC LANDSCAPING Total			5,122,771

C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
3	SERVICES			
3.01	Off site diversions			
	a J1 - LV Pole	1 P Sum	15,000.00	15,000
	b J2 - None expected	1 item	EXCL	EXCL
	c J3 - Diversion of Overhead BT	1 P Sum	15,000.00	15,000
	d J4 - None expected	1 item	EXCL	EXCL
	e J5 - None expected	1 item	EXCL	EXCL
	f J6 - Diversion of underground BT	1 P Sum	15,000.00	15,000
	g J7 - Diversion of underground LV	1 P Sum	15,000.00	15,000
	h J7 - Diversion of underground BT	1 P Sum	150,000.00	150,000
	j J7 - Diversion of underground Virgin	1 P Sum	150,000.00	150,000
	On site diversions Total			825,706
3.02	On site diversions			
	a Diversion of HV infrastructure including replacing pole mounted transformers	1 P Sum	750,000.00	750,000
	b Diversion of Overhead BT lines to SW corner of site	1 P Sum	100,000.00	100,000
	On site diversions Total			1,210,000
3.02	Off Site Reinforcement			
	Electrical			
	a Cable lay off site	3,000 m	211.48	634,440
	b Primary Substation	1 P Sum	3,000,000.00	3,000,000
	Gas			
	a Medium pressure off site main to POC	1,250 m	211.48	264,350
	b Pressure Reduction System	1 Item	37,009.00	37,009
	Water			
	a Off site pipe lay to POC	1,000 m	211.48	211,480
	Off site reinforcement Total			3,935,799
3.03	On site infrastructure			
	a Electrical infrastructure; substations	8 Nr	63,444.00	507,552
	b Electrical, Gas and Water Connections	1,850 Nr	1,850.45	3,423,333
	On Site Infrastructure Total			3,930,885

C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
3.04	Protection of existing utilities on site			
	General Allowances			
a	Provisional Sum	1 P Sum	150,000	150,000
	Protection Total			150,000
3.05	Storm water			
	Drainage			
a	Conveyance in landscaped areas (SAY)	300 m	185.05	55,514
b	Manholes (assumed number)	10 Nr	2,643.50	26,435
	SUDS			
c	Assumed number and size of ponds (SAY)	4 Nr	185,045.00	740,180
n	Swale courses (SAY)	1,000 m	84.59	84,592
q	Dredge existing ditch courses (SAY)	150 m	21.15	3,172
r	New offsite connection (SAY)	1 P Sum	30,000.00	30,000
s	Headwalls	10 Nr	12,688.80	126,888
t	Headwalls; extra over for flow control	5 Nr	6,344.40	31,722
	Storm water Total			1,098,503
3.06	Foul Water			
	Drainage			
	<i>Foul strategy not clear</i>			
a	Provisional allowance for sewers in landscaped areas	300 m	185.05	55,514
b	Manholes	10 Nr	2,643.50	26,435
c	Pumping Stations	1 P Sum	115,000.00	115,000
d	Off site works	1 P Sum	200,000.00	200,000
	Foul Water Total			396,949
3.07	Drainage diversions			
	Provisional allowances			
a	Foul	1 P Sum	30,000.00	30,000
b	Surface Water	1 P Sum	30,000.00	30,000
	Drainage diversions Total			60,000
3.08	Sundries			
a	BT ducts / Virgin Media	1 P Sum	150,000.00	150,000
	Sundries Total			150,000

C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
3.09	Preliminaries			
	a Site establishment, supervision and management	10 %	11,143,614.70	1,114,361
	b Traffic Management; notices, adverts etc	1 item	12,688.80	12,689
	Preliminaries Total			1,127,050
3.10	Contingency and Risk			
	a Design and Price Risk	2 %	12,270,664.97	245,413
	b Construction Contingency	3 %	12,270,664.97	368,120
	c Specific risk provisions:			0
	Contingency and Risk Total			613,533
3.11	Fees and other charges			
	a Fees - services consultancy (gas, water, electricity)	3 %	12,884,198.22	386,526
	b Fees - delivery of services (gas, water, electricity and drainage)	3 %	12,884,198.22	386,526
	c Section 104 costs (inspection fees)	5 %	1,555,451.20	77,773
	d Section 104 costs (adoption legal fees)	1 P Sum	10,000.00	10,000
	Fees and other charges Total			860,824
	SERVICES Total			13,745,023

SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV D - 10 NOVEMBER 2021



C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
4	ENVIRONMENTAL WORKS			
4.01	Ecological works			
	<i>Ecology Mitigation</i>			
a	Bird and Bat boxes	50 Nr	84.59	4,230
b	GCN / Other protected species allowance	1 P Sum	200,000.00	200,000
c	Fencing (SAY)	500 m	42.30	21,148
e	Ecology Surveys etc (for construction)	1 P Sum	75,000.00	75,000
f	Arbocultural Surveys	1 P Sum	50,000.00	50,000
	<i>Invasive Species</i>			
a	Japanese Knotweed	1 P Sum	25,000.00	25,000
b	Himalayan Balsam	1 P Sum	25,000.00	25,000
	Ecological works Total			400,378
4.02	Enabling Works			
	<i>Ground improvement</i>			
a	Isolated hot spots of contamination (provisional)	1 P Sum	30,000.00	30,000
b	Isolated ground improvement to road and infrastructure areas	1 P Sum	50,000.00	50,000
	<i>Earthworks</i>			
c	Local plot adjustment / cut & fill	1 P Sum	250,000.00	250,000
d	Top soil and subsoil handling strategy / levels issues	1 P Sum	150,000.00	150,000
	Enabling Works Total			480,000
4.03	Preliminaries			
a	Site establishment, supervision and management on capital works	10 %	880,377.60	88,038
b	Traffic Management; notices, adverts etc	1 item	52,870.00	52,870
	Preliminaries Total			140,908
4.04	Contingency and Risk			
a	Design and Price Risk	2 %	1,021,285.36	20,426
b	Construction Contingency	3 %	1,021,285.36	30,639
c	Specific risk provisions:			0
	Contingency and Risk Total			51,064
4.05	Fees and other charges			
a	Fees - design and delivery fees on capital works	10 %	1,072,349.63	107,235
	Fees and other charges Total			107,235
	ENVIRONMENTAL WORKS Total			1,179,585

SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV D - 10 NOVEMBER 2021



C Strategic On Site Works

£26,012,337

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
5	TEMPORARY WORKS			
5.01	Temporary Works			
	a Temporary Footpaths / diversions	1 P Sum	25,000.00	25,000
	b Temporary haul roads	1 P Sum	35,000.00	35,000
	c Temporary estate holding costs (H&S etc)	1 P Sum	50,000.00	50,000
	d Temporary signage	1 P Sum	15,000.00	15,000
5.02	Preliminaries			
	a Site establishment, supervision and management on capital works	10 %	125,000.00	12,500
	Preliminaries Total			12,500
5.03	Contingency and Risk			
	a Design and Price Risk	2 %	137,500.00	2,750
	b Construction Contingency	3 %	137,500.00	4,125
	c Specific risk provisions:			0
	Contingency and Risk Total			6,875
5.04	Fees and other charges			
	a Fees - design and delivery fees on capital works	10 %	125,000.00	12,500
	Fees and other charges Total			12,500
	TEMPORARY WORKS Total			156,875

C SWUE 300 Unit Appraisal

SWUE 300 Unit Appraisal
RLB Infrastructure

**SWUE 300 Unit Appraisal
RLB Infrastructure**
Appraisal Summary for Phase 1
Currency in £
REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
Market Housing	210	244,125	294.00	341,775	71,772,750
Affordable Rented	60	52,009	147.00	127,421	7,645,286
Shared Ownership	<u>30</u>	<u>25,616</u>	198.45	169,451	<u>5,083,545</u>
Totals	300	321,750			84,501,581

NET REALISATION
84,501,581
OUTLAY
ACQUISITION COSTS

Residualised Price (21.19 Acres @ 223,033.62 /Acre)		4,726,082		4,726,082
Stamp Duty		225,804		
Effective Stamp Duty Rate	4.78%			
Agent Fee	1.00%	47,261		
Legal Fee	0.80%	37,809		
				310,874

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost	
Market Housing	244,125	103.00	25,144,875	
Affordable Rented	52,009	103.00	5,356,927	
Shared Ownership	<u>25,616</u>	103.00	<u>2,638,448</u>	
Totals	321,750 ft²		33,140,250	
Resi Contingency		5.00%	2,037,235	
S106	300 un	12,500.00 /un	3,750,000	
Accessibility Standards			522,060	
				39,449,545
Other Construction				
Resi External Works		15.00%	4,971,038	
Resi Energy Requirements		6.00%	1,988,415	
RLB On & Off site Infrastructure	300 un	19,265.00 /un	5,779,500	
Garages			645,000	
Site Specific Abnormals - E/O	300 un	15,000.00 /un	4,500,000	
				17,883,953

PROFESSIONAL FEES

Professional Fees	7.00%	2,852,129		2,852,129
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DISPOSAL FEES

Sales Agent & Marketing Fee	3.00%	2,153,183		
Sales Legal Fee	0.50%	422,508		
				2,575,690

FINANCE

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)				
Land			1,051,325	
Construction			407,896	
Total Finance Cost				1,459,221

TOTAL COSTS
69,257,494
PROFIT
15,244,087
Performance Measures

Profit on Cost%	22.01%
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SWUE 300 Unit Appraisal**RLB Infrastructure**

Profit on GDV%	18.04%
Profit on NDV%	18.04%
IRR% (without Interest)	29.48%
Profit Erosion (finance rate 6.000)	3 yrs 4 mths

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

	001:Nov 2021	002:Dec 2021	003:Jan 2022	004:Feb 2022	005:Mar 2022
Monthly B/F	0	(5,036,956)	(5,062,141)	(5,087,325)	(5,112,762)
Revenue					
Sale - Market Housing	0	0	0	0	0
Sale - Affordable Rented	0	0	0	0	0
Sale - Shared Ownership	0	0	0	0	0
Disposal Costs					
Sales Agent & Marketing Fee	0	0	0	0	0
Sales Legal Fee	0	0	0	0	0
Unit Information					
Market Housing					
Affordable Rented					
Shared Ownership					
Commercial					
Acquisition Costs					
Residualised Price	(4,726,082)	0	0	0	0
Stamp Duty	(225,804)	0	0	0	0
Agent Fee	(47,261)	0	0	0	0
Legal Fee	(37,809)	0	0	0	0
Construction Costs					
Con. - Market Housing	0	0	0	0	0
Con. - Affordable Rented	0	0	0	0	0
Con. - Shared Ownership	0	0	0	0	0
Resi External Works	0	0	0	0	0
Resi Energy Requirements	0	0	0	0	0
RLB On & Off site Infrastructure	0	0	0	0	0
Garages	0	0	0	0	0
Site Specific Abnormals - E/O	0	0	0	0	0
Resi Contingency	0	0	0	0	0
S106	0	0	0	0	0
Accessibility Standards	0	0	0	0	0
Professional Fees					
Professional Fees	0	0	0	0	0
Net Cash Flow Before Finance					
	(5,036,956)	0	0	0	0
Debit Rate 6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(25,185)	(25,185)	(25,437)	(25,437)
Net Cash Flow After Finance	(5,036,956)	(25,185)	(25,185)	(25,437)	(25,437)
Cumulative Net Cash Flow Monthly	(5,036,956)	(5,062,141)	(5,087,325)	(5,112,762)	(5,138,199)

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

013:Nov 2022 (11,127,865)	014:Dec 2022 (11,952,441)	015:Jan 2023 (11,603,644)	016:Feb 2023 (11,252,026)	017:Mar 2023 (10,898,383)	018:Apr 2023 (10,541,911)	019:May 2023 (10,182,603)
0	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
0	109,218	109,218	109,218	109,218	109,218	109,218
0	72,622	72,622	72,622	72,622	72,622	72,622
0	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
0	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(102,409)	(101,598)	(100,786)	(99,975)	(99,164)	(98,353)	(97,542)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	(1,875,000)
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
(768,937)	402,244	403,056	403,867	404,678	405,489	(1,468,700)
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(55,639)	(53,448)	(51,437)	(50,224)	(48,205)	(46,182)	(44,877)
(824,576)	348,796	351,619	353,642	356,473	359,307	(1,513,577)
(11,952,441)	(11,603,644)	(11,252,026)	(10,898,383)	(10,541,911)	(10,182,603)	(11,696,180)

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

020:Jun 2023 (11,696,180)	021:Jul 2023 (11,341,290)	022:Aug 2023 (10,983,552)	023:Sep 2023 (10,623,701)	024:Oct 2023 (10,260,994)	025:Nov 2023 (9,895,429)	026:Dec 2023 (9,527,703)
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(96,731)	(95,919)	(95,108)	(94,297)	(93,486)	(92,675)	(91,864)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
407,111	407,922	408,734	409,545	410,356	411,167	411,978
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(52,221)	(50,185)	(48,882)	(46,838)	(44,791)	(43,441)	(41,385)
354,891	357,737	359,852	362,707	365,565	367,726	370,593
(11,341,290)	(10,983,552)	(10,623,701)	(10,260,994)	(9,895,429)	(9,527,703)	(9,157,110)

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

027:Jan 2024 (9,157,110)	028:Feb 2024 (8,783,646)	029:Mar 2024 (8,407,928)	030:Apr 2024 (8,029,331)	031:May 2024 (7,647,850)	032:Jun 2024 (7,264,020)	033:Jul 2024 (6,877,298)
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(91,052)	(90,241)	(89,430)	(88,619)	(87,808)	(86,997)	(86,186)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
412,789	413,601	414,412	415,223	416,034	416,845	417,656
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(39,326)	(37,882)	(35,814)	(33,742)	(32,203)	(30,123)	(28,039)
373,464	375,718	378,597	381,481	383,831	386,722	389,617
(8,783,646)	(8,407,928)	(8,029,331)	(7,647,850)	(7,264,020)	(6,877,298)	(6,487,680)

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

034:Aug 2024 (6,487,680)	035:Sep 2024 (6,095,615)	036:Oct 2024 (5,700,647)	037:Nov 2024 (5,302,771)	038:Dec 2024 (4,902,348)	039:Jan 2025 (4,499,009)	040:Feb 2025 (4,092,751)
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(85,374)	(84,563)	(83,752)	(82,941)	(82,130)	(81,319)	(80,507)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
418,468	419,279	420,090	420,901	421,712	422,523	423,334
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(26,403)	(24,310)	(22,214)	(20,478)	(18,374)	(16,265)	(14,428)
392,065	394,968	397,876	400,423	403,339	406,258	408,907
(6,095,615)	(5,700,647)	(5,302,771)	(4,902,348)	(4,499,009)	(4,092,751)	(3,683,845)

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

041:Mar 2025 (3,683,845)	042:Apr 2025 (3,272,010)	043:May 2025 (2,857,244)	044:Jun 2025 (2,439,726)	045:Jul 2025 (2,019,269)	046:Aug 2025 (1,595,867)	047:Sep 2025 (1,169,609)
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(79,696)	(78,885)	(78,074)	(77,263)	(76,452)	(75,640)	(74,829)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
424,146	424,957	425,768	426,579	427,390	428,201	429,013
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(12,311)	(10,191)	(8,250)	(6,122)	(3,989)	(1,944)	0
411,834	414,766	417,518	420,458	423,402	426,258	429,013
(3,272,010)	(2,857,244)	(2,439,726)	(2,019,269)	(1,595,867)	(1,169,609)	(740,597)

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

048:Oct 2025 (740,597)	049:Nov 2025 (310,773)	050:Dec 2025 119,862	051:Jan 2026 551,308	052:Feb 2026 983,565	053:Mar 2026 1,416,633	054:Apr 2026 1,850,513
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(74,018)	(73,207)	(72,396)	(71,585)	(70,774)	(69,962)	(69,151)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
429,824	430,635	431,446	432,257	433,068	433,880	434,691
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
0	0	0	0	0	0	0
429,824	430,635	431,446	432,257	433,068	433,880	434,691
(310,773)	119,862	551,308	983,565	1,416,633	1,850,513	2,285,204

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

055:May 2026	056:Jun 2026	057:Jul 2026	058:Aug 2026	059:Sep 2026	060:Oct 2026	061:Nov 2026
2,285,204	2,720,705	3,157,018	3,594,142	4,032,078	4,470,824	4,910,382
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(68,340)	(67,529)	(66,718)	(65,907)	(65,095)	(64,284)	(63,473)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
435,502	436,313	437,124	437,935	438,746	439,558	440,369
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
0	0	0	0	0	0	0
435,502	436,313	437,124	437,935	438,746	439,558	440,369
2,720,705	3,157,018	3,594,142	4,032,078	4,470,824	4,910,382	5,350,751

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

062:Dec 2026	063:Jan 2027	064:Feb 2027	065:Mar 2027	066:Apr 2027	067:May 2027	068:Jun 2027
5,350,751	5,791,931	6,233,922	6,676,724	7,120,337	7,564,762	8,009,998
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(62,662)	(61,851)	(61,040)	(60,228)	(59,417)	(58,606)	(57,795)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
441,180	441,991	442,802	443,613	444,425	445,236	446,047
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
0	0	0	0	0	0	0
441,180	441,991	442,802	443,613	444,425	445,236	446,047
5,791,931	6,233,922	6,676,724	7,120,337	7,564,762	8,009,998	8,456,044

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

069:Jul 2027	070:Aug 2027	071:Sep 2027	072:Oct 2027	073:Nov 2027	074:Dec 2027	075:Jan 2028
8,456,044	8,902,903	9,350,572	9,799,052	10,248,344	10,698,446	11,149,360
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(56,984)	(56,173)	(55,362)	(54,550)	(53,739)	(52,928)	(52,117)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
446,858	447,669	448,480	449,292	450,103	450,914	451,725
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
0	0	0	0	0	0	0
446,858	447,669	448,480	449,292	450,103	450,914	451,725
8,902,903	9,350,572	9,799,052	10,248,344	10,698,446	11,149,360	11,601,085

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

076:Feb 2028	077:Mar 2028	078:Apr 2028	079:May 2028	080:Jun 2028	081:Jul 2028	082:Aug 2028
11,601,085	12,053,621	12,506,969	12,961,127	13,416,097	13,871,877	14,328,469
1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325	1,025,325
109,218	109,218	109,218	109,218	109,218	109,218	109,218
72,622	72,622	72,622	72,622	72,622	72,622	72,622
(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)	(30,760)
(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)	(6,036)
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)	(330,854)
(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)	(70,486)
(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)	(34,716)
(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)	(65,408)
(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)	(26,163)
(51,306)	(50,495)	(49,683)	(48,872)	(48,061)	(47,250)	(46,439)
(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)	(8,487)
(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)	(59,211)
(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)	(26,806)
0	0	0	0	0	0	0
(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)	(6,869)
(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)	(37,528)
452,536	453,347	454,158	454,970	455,781	456,592	457,403
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
0	0	0	0	0	0	0
452,536	453,347	454,158	454,970	455,781	456,592	457,403
12,053,621	12,506,969	12,961,127	13,416,097	13,871,877	14,328,469	14,785,872

**SWUE 300 Unit Appraisal
RLB Infrastructure**

Detailed Cash flow Phase 1

083:Sep 2028	084:Oct 2028	085:Nov 2028	086:Dec 2028	087:Jan 2029
14,785,872	15,244,087	15,244,087	15,244,087	15,244,087
1,025,325	0	0	0	0
109,218	0	0	0	0
72,622	0	0	0	0
(30,760)	0	0	0	0
(6,036)	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
(330,854)	0	0	0	0
(70,486)	0	0	0	0
(34,716)	0	0	0	0
(65,408)	0	0	0	0
(26,163)	0	0	0	0
(45,628)	0	0	0	0
(8,487)	0	0	0	0
(59,211)	0	0	0	0
(26,806)	0	0	0	0
0	0	0	0	0
(6,869)	0	0	0	0
(37,528)	0	0	0	0
458,214	0	0	0	0
6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%
0	0	0	0	0
458,214	0	0	0	0
15,244,087	15,244,087	15,244,087	15,244,087	15,244,087

Appendix 5: Summary of SWUE technical assessments

APPENDIX 5: Summary of SWUE Technical Assessments

Landscape, Townscape & Visual Sensitivity	<p>A Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal has been undertaken by Randall Thorp. The report considers the existing character and visibility of the site, reviews the landscape, adjacent townscape and visual baseline in order to provide evidence to support the allocation of the site and inform the concept masterplan for residential development.</p> <p>The appraisal demonstrates the site's ability to accommodate development in principle without undue impacts on the surrounding landscape, and concludes that there is no reason why a well-designed development that preserves the existing landscape features such as watercourse and trees within a green infrastructure network and responds sensitively to the setting of the Walton Village Conservation Area and heritage assets, would have any significant effects on the landscape and townscape character of the surroundings.</p> <p>With appropriate good design and well thought out landscape mitigation measures, development within the site has the potential to avoid significant effects on the visual amenity of the surrounding receptors.</p> <p>There are no landscape, townscape or visual sensitivities which would prevent the SWUE site being developed as a sustainable urban extension for around 1,800 dwellings and associated infrastructure.</p>
Ecology	<p>A Preliminary Ecological Appraisal of the site has been undertaken by TEP, informed by the results of a desktop assessment and site surveys.</p> <p>The appraisal concludes that the provision of large areas of open greenspace in the northern part of the SWUE site will be of benefit. New crossings through existing hedgerows, treelines and across watercourses will be designed so as to impose minimal impacts on protected species and habitats. Any losses will be mitigated within the open greenspace to be provided within the site.</p> <p>Further detailed surveys will be required at planning application stage, including in relation to bats, amphibians, otter and water voles, badgers and nesting birds. A Reasonable Avoidance Method Statement (RAMS) for brown hare, hedgehog and potentially common toad will be provided to detail how harm to these species will be avoided during construction works. Management plans to prevent the spread of invasive species (Himalayan balsam, Japanese knotweed, Japanese rose and rhododendron) during development can be secured via condition at planning application stage.</p> <p>The appraisal presents a number of measures which could be included to ensure that there is a measurable gain in biodiversity on the site. Such measures could potentially include the installation of bird and bat boxes around the site, the provision of areas of wildflower / grassland planting as part of the landscaping proposals, the inclusion of berry-bearing and nectar rich species of ornamental / landscape planting to provide a foraging resource for a range of wildlife species, including invertebrates, birds and bats.</p> <p>The appraisal concludes that there are no overriding ecological constraints which preclude sustainable development of the site.</p>

	<p>A Biodiversity Net Gain assessment has also been undertaken which includes an outline strategy for the achievement of a net gain through on site interventions.</p>
Noise	<p>Miller Goodall has undertaken a desktop noise screening assessment, a preliminary walkover survey and preliminary noise measurements to review potential issues and solutions associated with noise at the SWUE site.</p> <p>The assessment concludes that noise would not be a barrier to residential development on the site. Whilst the assessment identifies some areas of the site where noise will need to be considered at the detailed design stage (e.g. adjacent to existing roads and the railway line and industrial and commercial operations around the periphery of the site), a suitable and commensurate level of protection against noise can be provided following a detailed noise assessment(s). Such mitigation could include the orientation of plots within the layout, enhanced glazing / alternative ventilation to affected properties and / or acoustic barriers.</p> <p>There will be no significant impacts for noise as a result of the development and, with good acoustic design, the impacts can be minimised.</p>
Flood Risk & Drainage	<p>A Flood Risk & Drainage Appraisal has been undertaken by Shepherd Gilmour Infrastructure (SGI) to provide an in-depth assessment of the potential flood risk on-site and identify an initial foul and surface water drainage strategy for the SWUE, which has informed the concept masterplan for the site.</p> <p>The majority of the SWUE site is located within Flood Zone 1 (low probability of flooding), with some small areas close to the unnamed watercourse which crosses the site indicated as Flood Zones 2 and 3 (medium and high probability). Where possible, built development will be located within Flood Zone 1.</p> <p>SGI has presented an indicative site-wide drainage strategy which demonstrates one option for how the site could be drained; there are likely to be a number of suitable drainage strategy options available.</p> <p>The indicative drainage strategy presented by SGI indicates that the proposed development will prioritise infiltration as a means to dispose of surface water runoff. If ground conditions prohibit infiltration, plots / parcels will be allowed to discharge clean / untreated runoff into the main network(s) in the highway. The main surface water infrastructure will discharge clean / treated runoff into the Manchester Ship Canal or onsite watercourse at an approved greenfield runoff rate. Discharge locations and attenuation structure(s) can be approved at detailed design stage. The proposed foul flows from the development will discharge to existing United Utilities combined water sewer(s) via the main foul water infrastructure within the highway. Connection point(s) to the combined water sewer are to be agreed with United Utilities at detailed design stage.</p>
Arboriculture	<p>A preliminary arboricultural survey and desktop assessment of the SWUE site has been undertaken by TEP, to identify potential constraints and opportunities for future development and report on the preliminary assessment effects of the concept masterplan for the site.</p>

Trees cover a relatively small proportion of the total site area and are predominantly concentrated towards the western half of the site. The majority are located along watercourses, on field boundaries and within hedgerows parallel to public highways.

In terms of quality and particularly habitat and amenity benefits, the tree population is good but could be improved. The extant population provides good screening and contributes to visual amenity and the creation of a rural aesthetic. However, canopy cover is relatively low and connectivity would benefit from reinforcement in some areas.

Existing tree cover on the site is relatively limited and mostly confined to a few key areas following water courses, the canals and railway, and public highways. Due to these areas being less suitable for development due to proximity to sensitive receptors or sources of noise, the concept masterplan generally respects existing tree cover. It is therefore likely that residential development in broad accordance with the concept masterplan could be delivered without necessitating significant tree removal.

Given the landscaping and green infrastructure shown on the concept masterplan, it is also likely that development of the site would result in an increase in tree canopy cover. This point is reinforced by the relatively low extant tree cover within agricultural fields.

A detailed tree survey undertaken according to BS5837:2012 will be undertaken to inform the detailed design stage.

Heritage

A Heritage Appraisal has been undertaken and identifies heritage assets with potential to be affected by the development of the SWUE site and identifies whether there are heritage constraints to development and how these constraints could be resolved or mitigated.

The appraisal recommends a number of measures which will help to reduce the impact of the development on the significance (by way of setting) of the identified heritage assets. These measures have been incorporated into the concept masterplan that has been prepared by Randall Thorp. The Heritage Appraisal concludes that, if these measures are implemented, the development of the SWUE will sustain the significance of the identified designated heritage assets, in accordance with NPPF Paragraphs 192 and 193.

The requirement of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act can be satisfied in determining future planning applications, subject to a considered design approach.

The development of the SWUE site will result in the partial loss of the rural setting of a number of locally listed buildings (non-designated heritage assets).

In accordance with NPPF Paragraph 197, in weighing future applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Highways

iTransport has prepared a transport appraisal which considers the transport and highways related aspects of the development proposals at SWUE.

The appraisal demonstrates that the proposed development will support and promote sustainable development and sustainable travel patterns with residents able to meet day-to-day needs locally. As such, it is a suitable location for development.

Access to the site is proposed off Chester Road and Runcorn Road and feasibility level designs of the principal accesses have been produced and the capacity of these considered. The access arrangements will operate satisfactorily. Access to the site is deliverable and achievable.

The proposed Western Link will provide significant additional capacity in the central Warrington Road network and will assist in facilitating the full SWUE development proposals. However, this assessment demonstrates that some development can come forward immediately and prior to the development of the Western Link in order that the proposal can contribute to meeting development requirements during the first five years of the plan period.

Traffic assessments of a first phase of development delivered in advance of the Western Link, demonstrate that the generated traffic flows will form only a small proportion of existing traffic flows, well within daily variations in traffic, and will not result in severe traffic impacts.

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.

Health &
Safety

Solvay Interlox Ltd and the Former Norbert Dentressangle site are located to the north of the Manchester Ship Canal. Both facilities are identified by the Health & Safety Executive (HSE) as an upper tier COMAH (Control of Major Accident Hazards Regulations 2006) site. The Inner, Middle and Outer HSE Consultation Zones extend into the SWUE site.

The concept masterplan has been prepared to accord with the HSE safety zoning. Consequently, the proposed housing will be located in the middle and outer consultation zones, which will comply with the HSE guidelines.

There is no health and safety reason to prevent the site being allocated for residential development.

Appendix 6: SWUE Memorandum of Understanding

Memorandum of Understanding

Between: Peel L&P Investments (North) Limited,
Story Homes Limited, Riley Properties Limited and
Ashall Property Limited

**Warrington Borough Council Local Plan 2021-38
Proposed Submission Version (September 2021):
Warrington South West Urban Extension**

November 2021

1. Introduction

- 1.1 This Memorandum of Understanding (MoU) has been prepared jointly by Peel L&P Investments (North) Limited, Story Homes Limited, Riley Properties Limited and Ashall Property Limited; hereby known as the South West Urban Extension Consortium (or 'the Consortium').
- 1.2 This document relates to the South West Urban Extension (SWUE), previously identified for residential development in the Warrington Proposed Submission Version Local Plan (March 2019) in Policy MD3 – South West Urban Extension. The SWUE allocation has since been removed from the Warrington Proposed Submission Version Local Plan (September 2021).
- 1.3 This document sets out the Consortium commitment to delivering the South West Urban Extension in a collaborative manner.

2. Background

2.1 The SWUE was previously allocated in the Warrington Proposed Submission Version Local Plan (March 2019) in Policy MD3 – South West Urban Extension to deliver:

- A new residential community of around 1,600 homes
- A two-form entry primary school
- A mixed-use local centre providing a health facility and a range of units
- Variety of high-quality open space including a new Local Park, playing pitches and play spaces.

2.2 Within the Warrington Proposed Submission Version Local Plan (March 2019) the SWUE allocation is intended to be delivered from Year 7 of the Plan Period (2023/24) continuing beyond the Plan Period. As identified in Appendix 1 – Housing Trajectory and Stepped Housing Supply in the 2019 version of the Local Plan. The Consortium fully supported the principle of this allocation and subsequent policy.

2.3 Collaboratively the site is under the control of Peel L&P Investments (North) Limited, Story Homes Limited, Riley Properties Limited and Ashall Property Limited. The Consortium Group collectively own a significant majority of the site, this includes the access points and locations for key pieces of infrastructure required to deliver the development. Through representations previously submitted, and meetings with Warrington Borough Council, the Consortium Group have consistently expressed clear support for the site's allocation and also the Council's decision to bring forward an ambitious growth-led Local Plan.

2.4 The iterations of the Warrington local Plan and subsequent evidence base documents, up to the 2019 Version, clearly show support for the allocation of the SWUE. Warrington Councils South Warrington Urban Extension Framework Plan Document (June 2017) shows clear support for the site and the benefits it could bring to the wider area.

“The Development of the SWUE site presents a significant positive opportunity for Warrington, which will help to meet housing land supply requirements in the following years... This will be a significant opportunity for Warrington to create a new sustainable urban extension to the south west of Warrington.”¹

2.5 The SWUE Consortium Group has been working collaboratively to refine proposals for the scheme at South West Warrington. Over the duration of the Local Plan production the Consortium Group has engaged and worked with the Council and enhanced the Masterplan to reflect this progression. This has been informed via the instruction or update of technical evidence, ensuring that the proposals are technically deliverable.

2.6 Following the consultation on the Warrington Proposed Submission Version Local Plan (March 2019), Warrington Borough Council has proposed a number of changes to the Local Plan. These include:

- A reduction in the Housing Requirement from 945 to 816 dwellings per annum (dpa)

¹ Warrington Borough Council: South Warrington Urban Extension Framework Plan Document (June 2017) p.39

- The allocation of Land at Fiddlers Ferry for both employment and residential development
 - The subsequent removal of draft allocations including the South West Urban Extension
- 2.7 The SWUE allocation has now been removed from the Warrington Proposed Submission Version Local Plan (September 2021). The Consortium are disappointed in the Councils decision to remove this allocation given that the scheme aligned with the wider ambitions of the Local Plan and were supported in principle by the Council themselves.
- 2.8 The Consortium Group considers it vital that Warrington Borough Council progress with an ambitious growth-led Local Plan which ensures appropriate levels of housing and economic development are pursued. The Consortium Group is disappointed in the Councils change in stance on housing need and growth, between the 2019 and 2021 Submission Version Local Plan, which has resulted in the SWUE being removed from the Plan.
- 2.9 The Consortium Group consider that this removal is unjustified. In addition, the Group is concerned that the Council has decided to move away from a Plan that was growth-led, to a version of the Local Plan which seems to adopt the minimum requirement as dictated by the Standard Method. This sudden contradiction is deeply concerning and is not considered to be robustly justified.
- 2.10 The Consortium remains fully committed to promoting the SWUE for residential development and have previously demonstrated through technical evidence that the site is a sustainable and deliverable option for development within the Borough. This will be demonstrated further in the combined and independent representations to the current Local Plan consultation.

3. Commitment


- 3.1 Despite the loss of an allocation at SWUE, the Consortium members are fully committed to work collaboratively in order to promote the site for development.
- 3.2 The Consortium are also fully committed to continue to work with Warrington Borough Council in order to develop a sustainable and deliverable vision for SWUE, subject to an allocation in the future iterations of the Local Plan.
- 3.3 The Consortium agrees that development at the SWUE should be comprehensive and coordinated. A Development Prospectus has been prepared and agreed by all Consortium members to demonstrate how the site could be brought forward for development in a comprehensive manner. It demonstrates how the individual and collective land ownerships are complementary and can contribute towards meeting the housing needs of Warrington in accordance with the overarching vision and objectives of the Local Plan.
- 3.4 The Consortium Group notes that the SWUE has the ability to deliver homes earlier than the anticipated trajectory, as seen within the Warrington Proposed Submission Version Local Plan (March 2019).
- 3.5 The Consortium have collectively and separately undertaken significant technical work to ensure that there are no insurmountable obstacles to the delivery of residential development and can demonstrate clear achievability.
- 3.6 The Consortium are committed to working with Warrington Borough Council (as Local Planning Authority and Local Highway Authority) and have held a number of joint meetings with the Council.
- 3.7 The Consortium remains committed to continuing to work in partnership with the Council to secure the delivery of housing on the SWUE at the earliest opportunity.
- 3.8 Finally, the Consortium Group remains in agreement that the Warrington South West Urban Extension remains deliverable, achievable, available and viable.

4. Declaration

Signed on behalf of Peel L&P Investments (North) Limited:

Name: Steven Underwood

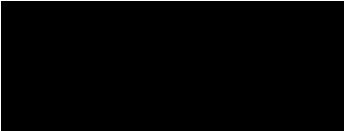
Date: 12/11/2021

Signature: 

Signed on behalf of Story Homes Limited:

Name: John Winstanley

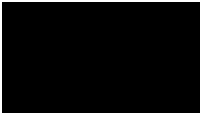
Date: 12/11/2021

Signature: 

Signed on behalf of Riley Properties Limited:

Name: Stafford Clever

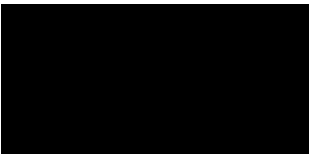
Date: 

Signature: 

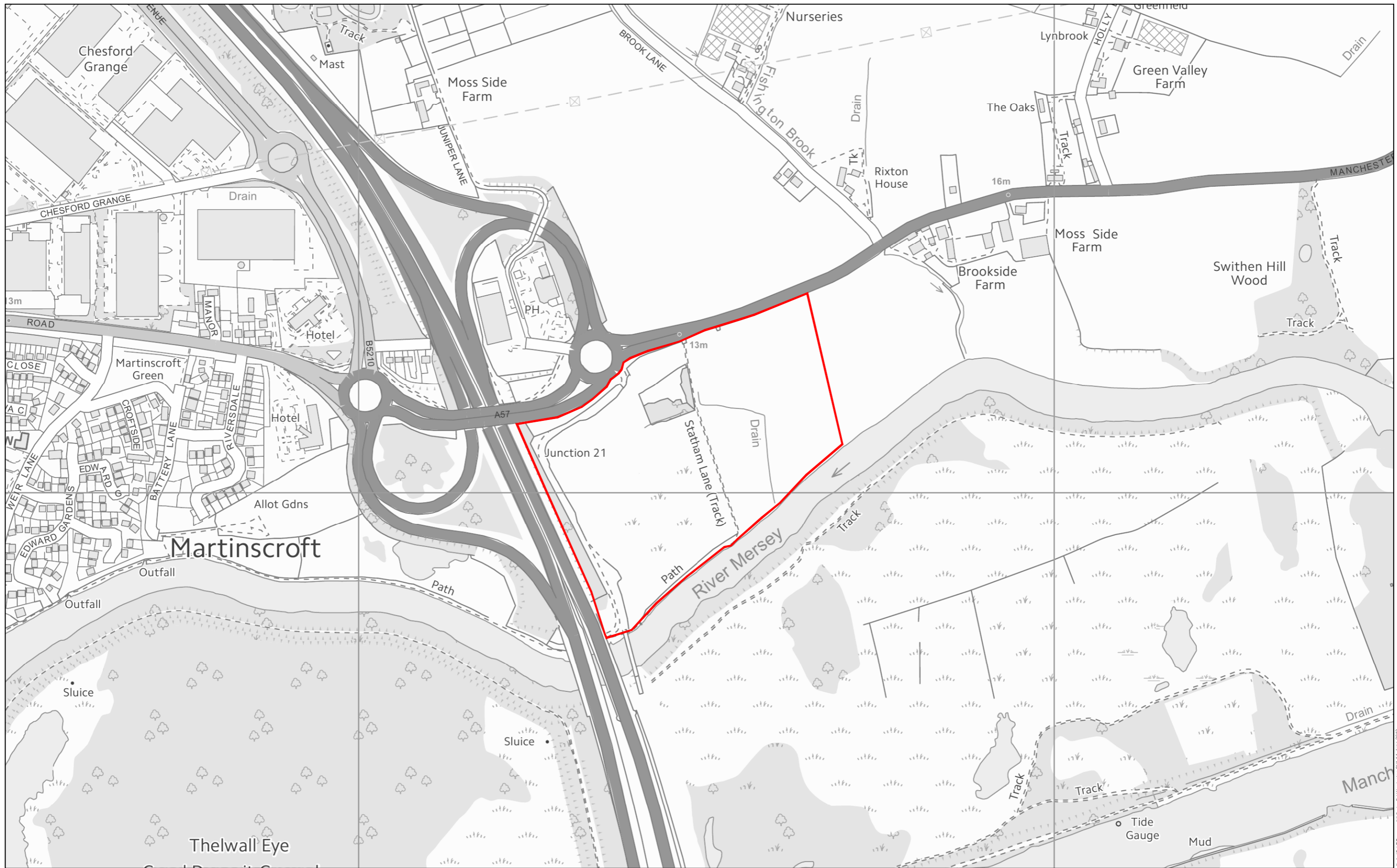
Signed on behalf of Ashall Property Limited:

Name: Scott Ashall

Date: 

Signature: 

Appendix 7: Land at Statham Meadows



Statham Meadows, Warrington



Date: 20:08:15 Scale: 1:5000
@ A3

OS MasterMap Imagery Layer has been created using Ordnance Survey's own imagery and imagery from other suppliers. This data may contain imagery data sourced from GeoMapping plc imagery data sourced from UK Perspectives Limited and/or imagery data sourced from InfoTerra Limited.
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BDS: JWS / Warrington SHLAA June 2012