

Local Planning Authority Application Reference:
2019/34799

Planning Inspectorate Reference:
APP/M0655/V/22/331187

**Land to the west of Junction 20 of the M6
Motorway and Junction 9 of the M56
Motorway and to the south of Grappenhall
Lane and Cliff Lane, Grappenhall, Warrington
– known as Six:56**

Proof of Evidence

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Applicant Name: Langtree Property Partners LLP

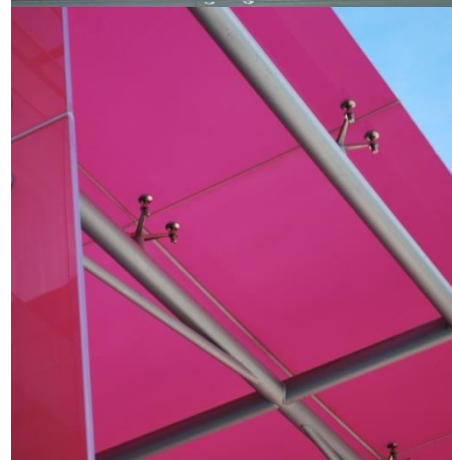
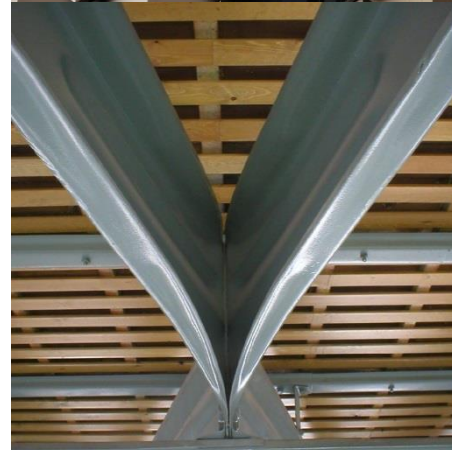
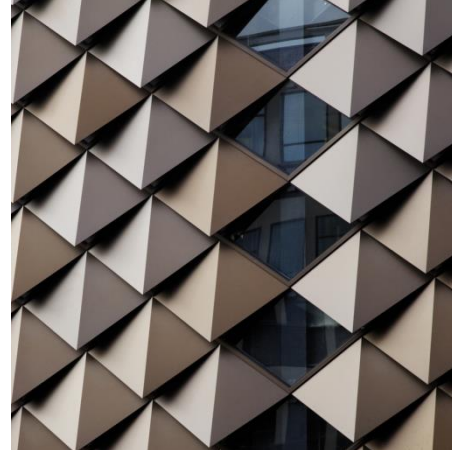


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1.0 Introduction and Scope of Evidence

1.1.1 This document is a Proof of Evidence that is submitted to the Inquiry in relation to an Outline Planning Application (2019/34799) with all matters reserved apart from access, as summarised below in the planning description.

‘Construction of up to 287,909m² (gross internal) of employment floor space (Use Class B8 and ancillary B1(a) offices), demolition of existing agricultural outbuildings and associated servicing and infrastructure, including car parking and vehicle and pedestrian circulation, alteration of existing access road into the Site including works to the M6 junction 20 dumbbell roundabout and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station and ecological works.’

1.1.2 A summary of the Proof is included in **Appendix AV001**.

1.1.3 Prior to determination of the application, agreement was reached with Warrington Borough Council (WBC) and National Highways (NH) that the proposed development would not give rise to unacceptable traffic and transport impacts, subject to the implementation of agreed mitigation.

1.1.4 At the meeting of its Development Management Committee held on Thursday 10th March 2022, WBC resolved to grant planning permission for the Development.

- 1.1.5 The application was referred to the Secretary of State, who after initially having directed that the application should be determined by WBC, subsequently reconsidered matters and called the application in for his own determination by letter dated 22nd November 2022.
- 1.1.6 This call-in decision gives rise to a public inquiry, the subject of this Proof of Evidence.
- 1.1.7 The key issues originally raised by the Secretary of State are summarised as:
- Green Belt policy;
 - Development plan consistency; and
 - Any other issues the Inspector sees fit to consider.
- 1.1.8 Prior to the first Case Management Conference, the Inspector expanded the matters to be considered and from a traffic and transport perspective made reference to:
- ‘the effect of the proposal on the safe and efficient operation of the highway network, local air quality and landscape character....’
- 1.1.9 This Proof considers the safe and efficient operation of the highway network as raised above.
- 1.1.10 Whilst a Highways Statement of Common Ground (HSOCG) has not been prepared, the WBC Committee Report (**CD 4.149**) and Planning Statement of Common Ground (SOCG) (**CD 4.147**) clearly

demonstrates that there are no highway matters of disagreement between WBC Highways, NH and the Applicant.

1.1.11 Para 7.1 to 7.3 of the SOCG state that:

‘Warrington Borough Council, as the Local Highway Authority, and National Highways had no objections to the planning application, subject to conditions and a S106 obligation, as set out in the March 2022 Committee Report (section 6; pages 38 and 39).

The March 2022 Committee Report is appended to the LPA’s Statement of Case. In the same report, the LPA concluded that, subject to such conditions and S106 obligation, there would not be a severe impact on the highway network (paragraph 10.105).

The LPA is not aware of any further material considerations post-dating the report of March 2022 that are relevant to the question of whether there would be impact, and if so the extent of the impact, on the highway network.’

1.1.12 Whilst WBC Highways and NH had no objection to the application, subject to mitigation, I intend to cover the following matters in this Proof for the benefit of the Inspector.

- **Section 2** of my evidence provides a summary of my experience and qualifications.
- **Section 3** considers the Site location and Site context.
- **Section 4** provides a summary of the project background with regard to traffic and transport.

- **Section 5** of my evidence provides an overview of the transport planning policy that is relevant to the appeal scheme and my interpretation of this.
- **Section 6** provides my views on the accessibility of the Site by sustainable modes, assessed against the policies set out in Section 5.
- **Section 7** considers the highway impacts against the key policies set out in Section 5.
- **Section 8** considers comments received from Interested Parties.
- **Section 9** presents my summary and conclusions.

2.0 Experience and Qualifications

2.1 Qualifications

- 2.1.1 My name is Alex Vogt and I am a Transport Planner. I hold a degree in Geography/IT from the University of Salford and a Master of Science degree in Transport Engineering and Planning, also from the University of Salford.
- 2.1.2 With regard to professional qualifications, I have received the Transport Planning Professional (TPP) qualification from the Chartered Institution of Highways and Transportation (CIHT). This was important in helping me to achieve Fellowship status with the CIHT which I was awarded in 2019.

2.2 Experience

- 2.2.1 I have circa 22 years' experience of transport planning in the UK, having spent the last twelve years working at Curtins. Prior to this I worked at Waterman Boreham, Boreham and Peter Brett Associates.
- 2.2.2 I currently hold the role of Board Director at Curtins, where amongst other things, I am responsible for leading Curtins' transport planning business across the UK and Ireland. Prior to this I was Head of Transport Planning for a period of two years.
- 2.2.3 My role at Curtins involves overseeing the provision of traffic and transport advice for development projects at all stages of the planning process. Whilst I have worked on a variety of public and private projects

across all sectors, I tend to get more involved in large and complex residential, commercial and industrial private sector developments.

2.2.4 In recent years my experience relevant to the application includes:

- Leading Curtins successful involvement on circa 92,000sqm of B8 development on Land at the Former Parkside Colliery in St Helens, including the provision of evidence at the Call In Inquiry.
- Leading Curtins successful involvement on circa 60,000sqm of B8 development on land known as HBC Fields in Halton.
- Whilst not directly related to logistics, I also have significant experience of advising on major development projects for Sites that generate significant amounts of movement. This includes a major £1 billion mixed-use development in Manchester known as Circle Square, consisting of a 1,100 space Multi Storey Car Park, 150-bedroom hotel, circa 2,000 residential/student apartments, and two B1 commercial buildings of 14 storeys and 18 storeys.

2.3 Duty to the Inquiry

2.3.1 I understand my duty to the Inquiry is to help the Inspector on matters within my expertise and that this duty overrides any obligation to the person from whom I have received instructions or by whom I am paid. I believe that the facts I state within this Proof are true and that the opinions expressed are correct.

3.0 Site Location and Context

3.1 Site Location and Existing Use

- 3.1.1 The Site is located to the southeast of the town of Warrington (approximately 6 km (3.5 miles) from the town centre) and between the cities of Liverpool and Manchester (approximately 22km (13 miles) and 31km (19 miles) respectively). It is also located approximately 16km (10 miles) from Manchester Airport.
- 3.1.2 The M56 Motorway and M6 Motorway interchange (Junction 20 and 20A of the M6 and Junction 9 of the M56 Motorway) is located adjacent to the south east of the Site, with the M56 Motorway running east-west to the south of the Site, providing links to Cheshire and Greater Manchester; and the M6 Motorway running north-south to the east of the Site, provide links to Lancashire, Staffordshire and Greater Manchester, as well as the M62 Motorway at Junction 22A of the M6 Motorway to the north, which provides links east-west to Liverpool, Greater Manchester and Yorkshire.
- 3.1.3 The Site is bound by the B5356 Grappenhall Lane and the A50 Cliff Lane to the north and motorway slip road to the east. Appleton Thorn Trading Estate, Barleycastle Trading Estate and Stretton Green Distribution Park are located to the west and Bradley Brook runs east-west to the southern boundary.

3.1.4 Three Public Rights of Way (PRoW) run across the Site, footpath Appleton No. 28, footpath Appleton No. 31 and footpath Appleton No. 23.

3.1.5 **Appendix AV002** includes a series of plans to assist the Inspector with regard to Site location. **Plan AV001** illustrates the regional location of the Site, **Plan AV002** shows the Site in a more local context and **Plan AV003** shows the existing PROW network.

3.2 Strategic Road Network

3.2.1 The Sites location in relation to the Strategic Road Network is shown on **Plan AV004**.

3.2.2 The M6 forms the eastern boundary of the Site, whereas the M56 North Cheshire Motorway forms the southern boundary of the Site.

3.2.3 The M6 provides access from the Site to areas such as Wigan, Preston, Knutsford, and Crewe, whereas the M56 connects Site users to Runcorn, Ellesmere Port, Wales, Altrincham, and Manchester Airport.

3.2.4 The M6 and M56 are both accessible via the M6 Junction 20 and M56 Junction 9 Interchange which is immediately adjacent to the northeast corner of the Site and within 1km of the centre of the site. The journey time from the Site access to the M6 is less than five minutes and the M56 is only slightly further.

- 3.2.5 The M56 is also accessible from Junction 10, circa 3 miles to the south west of the Site. There is a 7.5 tonne weight restriction between the Site and the junction which prohibits HGV's using this route.
- 3.2.6 It is my professional view that having two major motorways providing access to the north, east, south and west, within less than five minutes' drive time of the Site ensures excellent connectivity to the SRN. This in turn makes it ideally suited to serve the logistics industry and is 'a suitably accessible location' which is recognised as important in Para 83 of the NPPF.
- 3.2.7 This is a view shared by Model Logic which is a supply chain and logistics consultancy with a 30 year track record of delivering complex strategic supply chain projects. Additional information regarding the suitability of the sites location is set out in the Model Logic Six 56 Logistics Study Updated Report March 2023, which is appended to the Proof of Evidence prepared by Mr Andrew Pexton.

3.3 Local Highway Network

- 3.3.1 The Local Highway Network in the vicinity of the Site is described in detail in Section 2.2 of the June 2020 Updated Transport Assessment **(CD 4.3)** which formed part of the ES Addendum **(CD 4.3)**. However, for the convenience of the Inspector I have summarised the two key highways that border the Site below.

B5356 Grappenhall Lane

- 3.3.2 The B5356 Grappenhall Lane runs alongside the northern boundary of the Site for circa. 1.km in an east-west alignment between a three-arm roundabout with the A50 Cliff Lane to the east, continuing southbound past a three-arm roundabout with Broad Lane, before branching off at a priority junction with Barleycastle Lane towards the south and continuing as Grappenhall Lane to the south-west. Here, the B5356 Grappenhall Lane extends further towards the southwest for a length of approximately 1.2km until it reaches a priority junction with Lumb Brook Road and Green Lane, before continuing as the B5356 Stretton Road.
- 3.3.3 The carriageway width of the B5356 Grappenhall Lane is around 7.3m along the Site frontage, with verges of varying width on both sides and no pedestrian infrastructure. The road is unlit along most of its length and is subject to a 60mph national speed limit. To the south of the three-arm roundabout, this limit is reduced to 40mph, and the road is subject to a 7.5 tonnes weight restriction, which continues to be enforced when the road continues towards the southwest.

A50 Cliff Lane/M6 Junction 20

- 3.3.4 The A50 Cliff Lane commences as a continuation of the A50 Knutsford Road heading south until it reaches a three-arm roundabout with the B5356 Grappenhall Lane. Cliff Lane then runs alongside the north-eastern boundary of the Site in an east-west alignment between the M6 J20 to the east (and beyond to Knutsford) and Grappenhall Lane to the west.

- 3.3.5 In the vicinity of the 140m or so long section of frontage that the Site benefits from, the carriageway of Cliff Lane tapers down from the roundabout entry / exit to a single lane, with verges on both sides. There is a narrow footway on the northern edge of the road, which connects to Junction 20 of the M6. Where it meets the junction, there is an additional dropped kerb and tactile paving to allow pedestrian to cross along the outer circumference of the roundabout.
- 3.3.6 The road is lit by regularly spaced lighting columns along the extent of the Site frontage and is subject to a 60mph national speed limit.
- 3.3.7 Junction 20 off the M6 takes the form of a dumbbell roundabout that sits above and on either side of the north-south M6 alignment.
- 3.3.8 The roundabouts comprise of two lanes as do the roads connecting the roundabouts. Traffic flow through the junction is assisted via partial signalisation.

4.0 Project Background

4.1 Introduction

- 4.1.1 This section of my Proof provides a brief introduction to the development proposals with regard to traffic and transport.

4.2 Development Proposals

- 4.2.1 As the planning application is to be made in outline, the proposals are controlled by a series of “parameters” which have been tested as part of the Environmental Assessment. There are 9 parameter plans in total **(CD 4.16 to CD 4.24)** and one of them **(CD 4.20)** focuses on ‘Access and Circulation – points of access into the Site, improvements to A50 junction and M6 J20 dumbbell roundabouts including existing, proposed and diverted footpaths and cycleways and areas safeguarded for potential highway improvements.’
- 4.2.2 An Illustrative Masterplan (16-184-F013-001) **(CD 4.44)** has also been prepared to show how the Site may come forward and this is included as **Appendix AV003**.

4.3 Means of Access

- 4.3.1 It is proposed that the Site will be accessed via two new roundabouts onto Grappenhall Lane with one towards the western extent of the Site and one in a more eastern location.
- 4.3.2 The access arrangements are shown on the Means of Access Plans 64076-CUR-00-XX-DR-TP-75001-P03 **(CD 4.25)** and 64076-CUR-00-

XX-DR-TP-75002-P02 (**CD 4.26**) which are included in **Appendix AV004**.

4.3.3 Swept Path Analysis is included in Drawing 64076-CUR-00-XX-DR-TP-05001-P03 and **Appendix AV004**.

4.3.4 Stage 1 Road Safety Audits have been undertaken and a planning condition to secure the detailed design in accordance with the principles shown on the above drawings is also agreed and I consider this to be an acceptable delivery mechanism.

4.3.5 In addition to the access points onto Grappenhall Lane a series of highway improvements to facilitate access and mitigate impacts are proposed along the Site frontage and at the A50/M6 Junction 20. These comprise:

- The relocation of the existing A50 Cliff Lane roundabout to the west to enhance link storage capacity between it and the M6 motorway.
- Full signalisation of the A50 Cliff Lane roundabout, with widening of approach arms.
- Widening of the A50 link between the Cliff Lane roundabout to provide two lanes for much of the links length.
- Partial signalisation of the M6 junction 20 dumbbell roundabout.
- Widening of the M6 north-bound off-slip.

- Widening of the circulatory carriageway on the two M6 junction 20 dumbbell roundabouts. Widening on eastern approach to the M6 junction 20 dumbbell roundabout.
- The introduction of Microprocessor Optimised Vehicle Actuation (MOVA) signal control.
- A new footway and cycleway along the length of the Site's northern boundary frontage with the B5356 Grappenhall Lane.
- The safeguarding of a section of land to be landscaped extending from Grappenhall Lane to facilitate any future road widening and improvements required by WBC on Grappenhall Lane. This would protect a 25m corridor.

4.3.6 The proposals for the A50/M6 Junction 20 are shown on Drawing 64076-CUR-00-XX-DR-TP-75011-P06 **(CD 4.28) Appendix AV005**.

4.3.7 Swept Path Analysis of the A50/M6 Junction 20 is included in Drawing 64076 CUR 00 XX DR TP 05001 P03 and **Appendix AV005**.

4.3.8 The proposals for the new footway/cycleway along the Site frontage are shown on Drawing 64076-CUR-00-XX-DR-TP-75014-P02 **(CD 4.29) Appendix AV006 – Pedestrian Cycle Improvements**.

4.3.9 For the benefit of the Inspector I have prepared **Plan AV008** which shows the location of all of the access improvements and mitigation on a single plan.

4.3.10 I am of the professional view that the access and mitigation proposals are comprehensive and appropriate for the intended use and this position is supported by both WBC and NH who have considered the proposals and raised no objections.

4.4 Planning Background and Current Status

4.4.1 The planning background is extensive and spans circa 6 years. Rather than reproduce a full chronology here, I have sought to provide a brief summary of the pre-application and post-application discussions with WBC Highways and NH within **Appendix AV007**.

4.4.2 The conclusion of the application process was that all highways matters raised by WBC and NH were fully resolved before determination of the application, subject to appropriate conditions.

Committee Report

4.4.3 WBC Officers presented a report (**CD 4.149**) to the Planning Committee meeting held on the 10th March 2022 recommending that planning permission be granted subject to conditions, planning obligations and the Secretary of State not wishing to intervene.

4.4.4 A summary of transport impacts is included in Para 10.105 of the committee report and this states that

‘In conclusion, the applicant has proposed a number of mitigation measures which have been agreed with the Council’s highways team and National Highways and these, along with other measures

considered necessary by the Council's highways team as outlined above, can be secured by either conditions or a S106 obligation. Subject to these provisions, there would not be a severe impact on the highway network and the application accords with the above policies and the NPPF.'

Statement of Common Ground

- 4.4.5 In preparing for this Inquiry a Statement of Common Ground (SOCG) has been prepared between the Applicant and WBC.
- 4.4.6 With regard to highways this confirms that there are no objections from WBC or NH, as referenced in Para 1.1.11 of this Proof.

4.5 Land North of Barleycastle Lane

- 4.5.1 During the preparation of the Six:56 Development Proposals, the Applicant was aware that land to the west of the Site was also proposed as a potential logistics development scheme with a GIA of circa 59,000 sqm. This was promoted by Liberty Properties Development Ltd and Eddie Stobart.
- 4.5.2 The Site is known as Land North of Barleycastle Lane Appleton Thorn, Warrington and two planning applications were submitted.
- 4.5.3 The first application (2017/31757) was refused on the 14th November 2018 and this was subsequently appealed (APP/M0655/W/19/3222603).

- 4.5.4 A new application was submitted (2019/34739) in 2019. The Council resolved to grant planning permission, but the decision notice was never issued because the application was called in by the Secretary of State for his own determination. This occurred on the 21st May 2020 and the development was the subject of a Call In Inquiry (APP/M0655/V/20/3253083). This was dismissed by the Secretary of State on the 2nd November 2020.
- 4.5.5 Whilst the Appeal was dismissed, the Decision Notice (**CD 4.61**) states at Para 28 that:
- ‘For the reasons given in MR328-351 and MR425-427, the Secretary of State agrees with the Inspector at MR351 that the proposed development would not have any materially adverse impacts in traffic or transport terms, or on the safety and convenience of users of the nearby highway network. He further agrees there is no conflict with the relevant development plan policies, nor with guidance in paragraph 109 of the Framework. He agrees with the Inspector at MR427 that the highway benefits carry moderate weight.’
- 4.5.6 Given the uncertainty surrounding the application when the Six:56 proposals were being developed, Land North of Barleycastle Lane was included as a stand-alone sensitivity test within the Six:56 June 2020 updated Transport Assessment (**CD 4.3**). I introduce the Site here for the Inspectors convenience as I refer to it in later sections of this Proof.

4.6 Conclusions

4.6.1 Based on this section of my evidence I draw the following early conclusions:

- The Site is located in close proximity to two motorways which provides excellent access to the SRN. Access to the SRN makes the Site ideally suited to serve the logistics industry.
- The proposed access and mitigation designs are comprehensive and appropriate for their intended use and this is an agreed position between WBC and the Applicant as evidenced by the Committee Report and the position of no objection.

5.0 Transport Planning Policy Context

5.1 National Planning Guidance

- 5.1.1 It is my professional opinion that the relevant National Planning Policy Framework (NPPF) 2021 (**CD 1.1**) policies from a traffic and transport perspective are:

Paragraphs	Description
8 and 9	Three objectives – economic, social and environmental
	Planning decisions should play an active role in guiding development towards sustainable solutions.
10, 11	Presumption in favour of sustainable development.
83	Recognise and address specific locational requirements of different sectors. This includes storage and distribution operations at a variety of scales and in suitably accessible locations.
104	Transport issues should be considered from the earliest stages of development proposals, including the environmental impacts of traffic and transport infrastructure, and opportunities to promote walking, cycling and public transport use.
105	Focus of significant development on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Paragraphs	Description
110	Appropriate opportunities to promote sustainable transport modes; safe and suitable access to the Site for all users; and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree.
111	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.
112	applications should ‘give priority first to pedestrians and cycle movements’, facilitate ‘access to high quality public transport where possible.’, ‘create places that are safe, secure and attractive’, ‘allow for efficient delivery of goods’ and ‘be designed to enable charging of plug-in and other ultra-low emission vehicles.
113	Development that will generate significant amounts of movement should be required to provide a travel plan, and the application supported by a transport assessment.

5.1.2 My professional interpretation of the NPPF as a whole is that there is a clear presumption in favour of sustainable development as set out in Para 11, with sustainability a further important requirement of Paras 104, 105, 110 and 112. The sustainability of the Site is therefore fundamental to the acceptability of proposals and from a traffic and transport perspective this largely relates to accessibility.

- 5.1.3 I provide evidence in Section 6 which in my opinion clearly demonstrates the Site can be made to be accessible, has sought to maximise opportunities for sustainable modes of travel and constitutes sustainable development in accordance with the NPPF Paras 11, 104, 105, 110 and 112. This view is also shared by WBC Highways as evidenced by their position of no objection.
- 5.1.4 The NPPF confirms that if development can be demonstrated to be sustainable, it 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.
- 5.1.5 The term ‘severe’, in the context of highway capacity, was first introduced within the NPPF in 2012. Its introduction provided a major change in transport planning policy with the term ‘severe’ setting a very high bar for applications to be refused on highways grounds, when compared to PPG13, the previous transport policy document.
- 5.1.6 Whilst the NPPF does not provide a definition of precisely what constitutes severe, a review of the Oxford and Cambridge dictionaries reveals descriptions such as ‘very great’, ‘intense’, ‘extreme’ ‘very difficult’ ‘causing very great pain’ and ‘very serious’.
- 5.1.7 Discussions regarding the definition of the term have formed part of numerous planning applications and Appeals. In Appeal decision APP/P3040/W/17/3185493 dated 23rd May 2018, Para 11 makes reference to earlier decisions and states that the ‘term ‘severe’ sets a

high bar for intervention via the planning system in traffic effects arising from development; mere congestion and inconvenience are insufficient in themselves but rather it is a question of the consequence of such congestion.'

- 5.1.8 This position is reinforced in Appeal decision APP/A0665/W/19/3220360 dated 2nd October 2019 where increases in journey time, route reassignment and delay are considered in Para 13 as 'a matter of driver convenience, where relevant local and national policy concerns the impacts on the highway network.'
- 5.1.9 I have provided more detail on these Appeal decisions and three other decisions in **Appendix AV008**. The decisions demonstrate that at junctions operating at, or over capacity, the introduction of additional queuing, congestion, delay or driver inconvenience is not on its own sufficient for impacts to be considered 'severe'.
- 5.1.10 I share the view that queuing, delay, driver inconvenience and congestion are matters that are experienced by many people across the UK as part of a daily commute, particularly adjacent to urban areas or on the motorway network. An increase in congestion, delay or queuing may not even be perceptible to existing users, may result in a marginal impact or may only occur for a brief period of time each day. In my opinion this is a long way from being severe.
- 5.1.11 Furthermore, where there are highway impacts, physical mitigation can often be implemented to reduce the severity of the impact. However, it must also be borne in mind that natural reductions in severity can occur

in the form of route choice amendments. i.e. as a certain route or junction gets busier, people naturally adapt their patterns and find alternative routes, travel earlier/later or work from home. Traditional modelling assessment techniques don't always capture this, but it is important to note when considering if an impact is severe.

- 5.1.12 I provide evidence in Section 7 which demonstrates that extensive traffic modelling has been undertaken and the results of this demonstrate there would be no severe impact when the mitigation agreed with the WBC and NH is taken into account. This is an agreed position with WBC Highways and NH, who offer no objection on the basis of Para 111.
- 5.1.13 With regard to Para 110, subsection B, which relates to safe and suitable access, I have already set out in Section 4 my view that the access design is appropriate for its intended use. Acceptability of the access arrangements is an agreed position with no objection from WBC Highways or NH.
- 5.1.14 With regard to Para 83, which relates to locating storage and distribution in suitably accessible locations, I have already set out in Section 3 that having two major motorways providing access to the north, east, south and west, within less than five minutes' drive time of the Site ensures excellent connectivity to the SRN. This in turn makes it ideally suited to serve the logistics industry where access to the SRN is recognised as a key locational requirement.

5.2 Local Policy

Warrington Adopted Local Plan Core Strategy 2014 (CD 2.1)

- 5.2.1 Policy CS 1 Overall Spatial Strategy – Delivering Sustainable Development is in my view comparable to the NPPF Para 11 and recognises that ‘development proposals that are sustainable will be welcomed and approved without delay’.
- 5.2.2 Policy CS 2 is titled “Quality and Distribution of Development” and this states that ‘Major Warehousing and Distribution developments will be located away from areas sensitive to heavy vehicle movements, with direct access to the Primary Road Network, and where possible with access to rail and/or the Ship Canal.’
- 5.2.3 In my opinion the proposals accord with this, as evidenced by the ease of connection to the M6 / M56 motorway network, along with HGV restrictions along the roads to the west of the Site.
- 5.2.4 Policy CS4 Transport states that ‘Using the principles set out in Policy CS2, development will be located to reduce the need to travel, especially by car, and to enable people as far as possible to meet their needs locally. Early consultation with the Highways Agency (now National Highways) will be necessary for any proposal that may affect the Strategic Road Network. In particular, efforts should be aimed at reducing the proportion of car-borne commuting....and tackling the most congested parts of the Strategic Road Network notably the M6, M56, and M62.’

- 5.2.5 Policy MP 1 General Transport Principles sets out that sustainable development should ‘reduce the need for private car use through its location, travel planning and marketing (smarter choices) and any other measures to change travel behaviour.’ It also requires proposals to ‘Mitigate the impact of development 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.’
- 5.2.6 I consider this policy to be comparable to the NPPF traffic and transport policies and the provision of sustainable transport enhancements, the Travel Plan and highways mitigation as set out in Sections 6 and 7 demonstrates compliance of these principles.
- 5.2.7 Policy MP3, titled Active Travel, highlights the Council’s expectations for ‘high priority given to the needs and safety of pedestrians and cyclists in new development. New development should not compromise and should contribute to enhancing and developing integrated networks of continuous, attractive and safe routes for walking and cycling including improvements to roads, Rights of Way and the Greenway Network (as shown on the Policies Map).
- 5.2.8 With regards to potential improvements to the surrounding public transport network, Policy MP4, titled Public Transport, states: ‘In accordance with the Overall Spatial Strategy, development should be located in areas with easy access to public transport. Development should aim to make public transport a viable and attractive alternative

by ‘providing additional public transport infrastructure and services that are reasonably related in scale to the proposed development where existing facilities are not available or are in need of improvement, provided this does not impact on the deliverability of the scheme.’

5.2.9 Policy MP 5 Freight Transport states that ‘the Council will encourage development which generates significant movement of freight to locate on Sites which are served by rail and / or water or where such facilities can be provided as part of the development. Where such opportunities are not available, such development should be located where there is good access to the Primary Road Network....’

5.2.10 The Core strategy helpfully defines the Primary Route Network as:

‘Roads used for transport on a regional or county level, or for feeding in to the Strategic Road Network for longer journeys. Defined as roads that provide the most satisfactory route between places of traffic importance. The Primary Road Network includes the entirety of the Strategic Road Network. No roads classified lower than an A road should be included in the Primary Road Network. A roads on the Primary Road Network are coloured green on most maps, as opposed to the red of ordinary A roads. The Primary Road Network is constructed around a series of primary destinations - significant locations that are likely to attract traffic (examples locally of primary destinations are Warrington, Wigan, Widnes, Runcorn, St Helens, Leigh, Altrincham). A road on the Primary Road Network is known as a primary route.’

- 5.2.11 I am of the professional view that the Site does have ‘good access to the Primary Route Network’ given the Sites boundary is located immediately adjacent to Junction 20 of the M6, which forms part of the Strategic Road Network.
- 5.2.12 Policy MP 7 Transport Assessments and Travel Plans required the preparation of a Transport Assessment and Travel Plan.
- 5.2.13 I am of the view that the Core Strategy policies are similar to many of the NPPF policies and the Site accords with these by being located in an area that can be made accessible, by providing safe access, by providing an extensive package of highways mitigation, by having good access to the Primary Route Network and by being supported by a Transport Assessment and Travel Plan.

5.3 Emerging WBC Local Policy

- 5.3.1 The emerging Warrington Local Plan is considered in detail by other witnesses and therefore I do not make any comment on the weight attributable to this document, and I do not intend to make significant reference to this in my Proof.
- 5.3.2 I do however note that that the Council clearly concluded when allocating the Six:56 site in the emerging plan that it was suitable in traffic and transportation terms for its intended purpose.
- 5.3.3 I also note that the Inspectors Post Hearing Letter **(CD 3.2)** dated 16th December 2022 did not raise any traffic and transport concerns with the

South East Warrington Employment Area which is partly made up by the Six 56 development.

5.4 Appleton Thorn Neighbourhood Plan 2017 to 2027 (CD 4.96)

- 5.4.1 The Appleton Thorn Neighbourhood Plan has two traffic and transport policies with the first (Policy AT-TH1) relating to seeking developer contributions and CIL payments towards pedestrian and cycle highway improvement schemes, traffic calming and community transport.
- 5.4.2 The second policy (AT-TH2) relates to sustainable travel and enhancing existing pavements, cycle paths, crossings, landscaping and general mobility.
- 5.4.3 I am of the view that these policies are relevant with regard to the mitigation that I set out in section 6.

5.5 Warrington Local Transport Plan 4 (CD 4.62)

- 5.5.1 The LTP4 was adopted in December 2019 and sets a vision that ‘Warrington will be a thriving, attractive, accessible, and well-connected place with popular, high-quality walking, cycling, and public transport networks supporting our carbon-neutral future’. This vision is commensurate with the National and Local planning policies which are already referenced and considered further in Sections 6 and 7.

5.6 Conclusion

- 5.6.1 Based on this section of my evidence I draw the following conclusions:

- Having considered the National and Local policy context, I am of the view that there are two fundamental requirements that must be achieved.
 - Firstly, does the development represent sustainable development in accordance with the NPPF and policy CS 1 of the WBC Core Strategy.
 - Secondly, will the development result in an unacceptable impact on highway safety or residual cumulative impacts that are severe as set out in NPPF Para 111.
- Based on the evidence I have presented already and the evidence I will present in Sections 6 and 7 of this Proof, I am of the firm view that the development does represent sustainable development from a traffic and transport perspective and will not result in impacts on the road network that would be severe.
- I understand that neither WBC or NH have offered any highway objection to the application or evidence that the Site is unsustainable or would result in an unacceptable impact on highway safety or impacts that are severe.

6.0 Accessibility by Sustainable Modes of Transport

6.1 Introduction

- 6.1.1 This section of my Proof focuses on the sustainability of the proposals from an accessibility perspective, to determine whether the development constitutes sustainable development in accordance with the NPPF and the WBC Core Strategy.
- 6.1.2 At the outset I do acknowledge that opportunities for sustainable travel in the vicinity of the Site are currently limited. However, I consider this to be a factor of the Site location, remote from the existing settlement, which is typical of Sites appropriate for B8 logistical use, where a key requirement is good connectivity to the Strategic Road Network. This is recognised in Para 83 of the NPPF.
- 6.1.3 In my view, the question is not whether the Site is currently accessible, but whether the Site can be made to be accessible and employees have a genuine choice of travel, as set out in the NPPF.

6.2 Accessibility by Foot

- 6.2.1 With regards to walking distances, The Chartered Institution for Highways and Transportation (CIHT) document entitled 'Providing for Journeys on Foot' suggests walking distances which are relevant to this Site. These are reproduced in **Table 6.1**.

	Town Centres (m)	Commuting/School/ Sight Seeing (m)	Elsewhere/Local Services (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred Maximum	800	2000	1200

Table 6.1 – CIHT Recommended Walking Distances Source: ‘Providing for Journeys on Foot’, CIHT

- 6.2.2 I am aware that the more recent National Design Guide and National Model Design Code Guidance focuses more on walking distances of 800m, but this is not to say that distances beyond this are unacceptable for all users.
- 6.2.3 In my view the main sentiment running through all policy and guidance is a recognition that, whilst planners or designers cannot force uptake in active and more sustainable modes of transport, we can encourage people to choose to do so by enhanced infrastructure. The key theme is maximising choice.
- 6.2.4 To assist in summarising the accessibility of the Site by foot, indicative pedestrian catchment plans were produced and included in the Transport Assessment. These are reproduced in this Proof and **Plan AV005** shows distances of 500m, 1,000m and 2,000m which are termed ‘Desirable’, ‘Acceptable’ and the ‘Preferred Maximum’ by the CIHT for commuting trips.

- 6.2.5 The pedestrian catchment plan confirms that the Site is located within walking distance of one established residential area, namely Appleton Thorn to the west of the Site. Some members of the workforce could live in this area.
- 6.2.6 Pedestrian access to Appleton Thorn and the industrial estates to the west of the Site is currently limited due to a lack of footways on Grappenhall Lane to the north and west of the Site.
- 6.2.7 To improve this, the proposals include a significant enhancement of pedestrian and cycle infrastructure in the vicinity of the Site. This includes a new 3.5m shared pedestrian/cycle route that will link the two access roundabouts on Grappenhall Lane and provide connections to the west and east of the Site. This route is envisaged on the southern side of Grappenhall Lane and will extend for a distance of circa 1.2km along the Site frontage. A condition has been agreed to secure these works.
- 6.2.8 The route is shown on Drawing **64076-CUR-00-XX-DR-TP-75014-P02 (CD 4.29)** in **Appendix AV 006**.
- 6.2.9 During post submission discussions, WBC Highways expressed a desire to extend the shared pedestrian/cycle infrastructure along the Site frontage further to the west, so that it better connects to the Broad Lane roundabout.

- 6.2.10 WBC also requested a new pedestrian/cycle link on Broad Lane between the roundabout and Barleycastle Lane, in addition to a new pedestrian/cycle link on the very eastern section of Grappenhall Lane.
- 6.2.11 A financial contribution of £400,000 has been agreed with WBC Highways to secure the additional infrastructure.
- 6.2.12 I am of the view that the pedestrian infrastructure enhancements are comprehensive and have the potential to provide a significantly improved continuous link between the Site, the industrial estates to the west and Appleton Thorn beyond this.
- 6.2.13 With regard to connectivity to the east, I am of the view that demand is likely to be naturally limited due to the presence of the M6 J20 and the lack of facilities to the east. However, there is already existing pedestrian infrastructure, including a footway along the north of Cliff Lane, and some informal pedestrian crossing facilities at the dumbbell roundabout junction, should someone wish to walk in that direction. The new pedestrian infrastructure along the frontage of the Site and within the Site would tie into these existing facilities.
- 6.2.14 In addition to the external improvements, Footpath 31 currently follows the line of the current farm access into the Site from the A50 Cliff Lane and continues past the Bradley Hall moated Site and to the south of the Site as Footpath 23. It is proposed to retain Footpath 31 in its general extent albeit it may require a minor variation to the alignment to provide a safe crossing point across an internal estate road.

- 6.2.15 Footpath 28 currently runs east-west across the Site from Footpath 23 and 31, to the north of the Bradley Hall cottages, across the fields, before terminating at the field boundary to the western extent of the Site. Footpath 28 will be diverted as part of the Proposed Development. Its diverted route will run along the northern boundary of the Site, parallel with the B5356 Grappenhall Lane at the point of the proposed eastern access point. It will then re-enter the Site alongside an internal estate road and re-join Footpath 23. This is shown on the access and circulation parameter plan **(CD 4.20)**.
- 6.2.16 I consider the extensive package of proposed pedestrian infrastructure improvements to be in full accordance with Paras 104 and 105 of the NPPF which encourages ‘opportunities to promote walking’ and focuses ‘significant development on locations which are or can be made sustainable’ and ‘offers a genuine choice of transport modes.’
- 6.2.17 I also consider the improvements to be in accordance with policy MP3 of the Core Strategy and the traffic and transport policies set out in the Appleton Thorn Neighbourhood Plan.

6.3 Accessibility by Bicycle

- 6.3.1 In order to assist in assessing the accessibility of the Site by cycle, an 8km cycle catchment for the Site has been considered. The 8km (5-mile) cycling distance refers to a recommendation by Cycling England in the document ‘Integrating Cycling into Development Proposals’ (2009), which states ‘most cycle journeys for non-work purposes and those to rail stations are between 0.5 and 2 miles, but many cyclists are

willing to cycle much further (i.e. for work, a distance of 5 miles should be assumed)'.

- 6.3.2 **Plan AV006** presents an 8km cycle catchment for the Site which equates to a journey time of around 40 minutes, cycling at a speed of 12kph. The catchment includes large parts of southern and central Warrington, which I consider important as socio-economic analysis prepared by Amion (Contained as an Appendix in the Proof of Evidence of Mr David Rolinson) suggests that circa 50% of the workforce could live within Warrington.
- 6.3.3 The catchment also extends as far as Daresbury in the west, High Legh in the east and parts of Cheshire East such as Arley in the south.
- 6.3.4 The road network in WBC's administrative area has been graded by the Council from 1 to 4, where grade 1 represents roads requiring limited experience and 4 as roads requiring greater experience. This is shown in **Appendix AV 007**.
- 6.3.5 Whilst the routes in the immediate vicinity of the Site are currently classed as 3 or 4, the existing cycling infrastructure improves further away from the Site, with the majority of existing road links to the north and west graded as 2 or 3 by WBC.
- 6.3.6 National Cycle Route (NCR) 62 is situated around 2.5km (crow fly) distance to the north of the Site and this provides an excellent off-road link between Manchester and Warrington. There is also a traffic free

route located 500m to the north east of the Site which provides a connection to the NCR.

- 6.3.7 In addition, there are a number of local cycle routes to the west and north west of the Site that provide connections in the vicinity of Appleton Thorn, Stockton Heath, Stretton and Grappenhall Heys.
- 6.3.8 As part of the proposals, these exiting links will be supplemented by the aforementioned new off-road shared pedestrian/cycle route along the northern boundary of the Site which in my opinion will greatly enhance connectivity. The reduction in the speed limit on Grappenhall Lane will also assist cyclists.
- 6.3.9 On the above basis, I am of the view that cycling is a realistic mode of travel for those employees that live within 8km of the Site and perhaps some who live even further away.
- 6.3.10 I again consider the provision of new infrastructure in relation to the cycle network to be in compliance with the Core Strategy, Neighbourhood Plan and NPPF policies.

6.4 Accessibility by Public Transport

6.5 Accessibility by Bus

- 6.5.1 The nearest bus stops to the Site are situated in Appleton Thorn Village some 2.3km walk distance from the centre of the Site.
- 6.5.2 I accept that this is outside the Chartered Institution of Highways and Transportation's (CIHT's) recommended 400m walk distance threshold

to a bus stop from any new development. However, a summary of the bus services calling at these stops is provided at **Table 6.2** below.

Bus Service	Journey	Frequency		
		Monday to Friday	Saturday	Sunday
8/8A	Appleton Thorn - Cobbs Estate - Stockton Heath - Warrington	Hourly Service for part of the day and two hourly thereafter.		No Service
7	Appleton Thorn/Hatton - Dudlows Green – Stockton Heath - Warrington	3-4 per day		No Service

Table 6.2 – Summary of Bus Services

- 6.5.3 Whilst the services are currently too far away to effectively serve the Site, I understand that at the time of the June 2020 Updated Transport Assessment (**CD 4.3**) there was already some commitment from others to improve bus services to the west of the Site.
- 6.5.4 It was understood that the Land at Barleycastle Lane site had agreed to a Section 106 contribution of £600,000 to fund improvements and it was understood that a similar arrangement would be necessary to enhance bus services in the vicinity of the Site. On this basis the proposals were designed to accommodate bus movements within the Site.
- 6.5.5 During post submission discussions with WBC, it was agreed that £600,000 would be a suitable sum for the Six:56 public transport contribution. This funding would be used to pump-prime and establish a new bus service that would provide a connection between the Site,

surrounding areas where the workforce live, with a particular focus on the most deprived areas, and potentially the railway stations.

- 6.5.6 Socio-economic data from Amion demonstrates that the Site could potentially provide opportunities to local residents seeking employment and residing in areas of relatively significant deprivation. The analysis suggests the wards of Bewsey and Whitecross; Fairfield and Howley; Orford; Poplars and Hulme, Latchford, Great Sankey and Birchwood may benefit from enhanced connectivity to employment opportunities, such as that provided by a bespoke bus service.
- 6.5.7 I consider a bespoke shuttle bus of this nature to be the most effective and tailored proposal for the Site and it could be instrumental in connecting employees with the Site at times when access is actually required, rather than a traditional bus service that may not even be operational during traditional logistics shift start and end times.
- 6.5.8 I am aware of a similar service in Warrington, known as the Omega B52 Service, which connects workers from Westy, Latchford and a number of other areas in Warrington to the Omega Business Park Sites such as Amazon, ASDA, Dominos, Hermes, Hut Group, Plastic Omnium and Travis Perkins.
- 6.5.9 The service only costs circa £12 for a weekly ticket and the timetable has been designed to coincide with shift patterns. As a result, it does not operate every hour and instead runs between 5-6AM, between 1-3PM, 5-7PM and 9-11PM.

- 6.5.10 I understand from discussions with representatives of Omega that the B52 has been very popular and on occasions two buses per service are required to cater for demand.
- 6.5.11 WBC Highways are keen to replicate a comparable service and it was agreed during post submission discussions that the service should be developed further in terms of timings, location served, further financial support beyond the initial pump-priming, routing and frequency once more information is known on development timescales, end user travel patterns and individual occupier requirements. I understand this to be the same approach that was taken at Omega.
- 6.5.12 Para 10.82 of the Committee Report (**CD 4.149**) recognises that such a ‘service would offer particular benefit as it would be appropriate to also serve the existing Appleton Thorn Trading Estate which currently suffers from a lack of public transport provision.’ I agree with this view.
- 6.5.13 Whilst I accept that bus infrastructure is currently limited in the vicinity of the Site, I am of the view that the proposed contribution towards the establishment of a bespoke service and bus stop enhancements are significant and will offer benefits that accord with Policy MP4 of the Core Strategy, the Neighbourhood Plan and NPPF policies.
- 6.5.14 I also note that the Inspector for the Land at Barleycastle Lane Appeal considered this matter and the Decision Notice (**CD 4.61**) Para 3.24 and 3.25 state that:

‘Turning to concerns about the absence of public transport serving the appeal Site, I understand from the Travel Plan that the nearest bus stops to the Site are approximately 1.5km away, in the village of Appleton Thorn, and I therefore appreciate that access to and from vicinity of the appeal Site, other than by private car, would be difficult at the present time. However, the evidence before me shows that this situation would be addressed by the provisions of the S106 agreement and a number of the agreed conditions.

In particular, the S106 agreement makes provision for a “Public Transport Contribution” of £600,000, which would be used to “pump prime” a shift-friendly shuttle bus service for Site employees[193,224]. It is intended that this contribution would provide start-up costs and fund the service on a 3-shift basis for 1 year, by which time the local highway authority expects the service to be self-financing. Such a service could also serve other destinations at the Barleycastle Lane Trading Estate. The final details of the proposed bus facilities would be defined in the final Travel Plan – which would be secured by agreed Condition 25. Other agreed conditions also seek to provide facilities to encourage cycling to the proposed development. I consider that these measures would serve to make the appeal Site, and existing businesses in the surrounding area, more accessible by modes of transport other than the private car, and in this regard the proposal would accord with the aims of CS Policies MP1, MP3, MP4, and MP7.’

6.6 Accessibility by Rail

- 6.6.1 The nearest railway stations are in Warrington (Warrington Bank Quay and Warrington Central), both situated some 6.5km crow-fly distance from the Site.
- 6.6.2 This is outside of the distance recommended in the Chartered Institution of Highways and Transportation (CIHT) document, 'Planning for Public Transport in Developments'.
- 6.6.3 Notwithstanding, the stations lie within 8km cycle distance from the Site, making a longer journey by rail / cycle a possibility.
- 6.6.4 Both stations are collectively served by a large number of train services that route to a wide variety of destinations across the entire country at a high frequency. Selected destinations include Manchester, Liverpool, Blackpool, London, Glasgow, Edinburgh and Llandudno.
- 6.6.5 Enhanced cycling and public transport infrastructure in the vicinity of the Site may enhance the attractiveness of these modes of travel as part of a multi modal trip that is linked with rail.

6.7 Travel Plan

- 6.7.1 The NPPF and Policy MP7 of the WBC Local Plan Core Strategy requires a Travel Plan to be submitted where developments are likely to have significant transport implications. On this basis, a Framework Travel Plan was prepared and submitted in support of the application **(CD 4.63)** to encourage travel by sustainable modes of travel.

- 6.7.2 The Framework Travel Plan will be a live document that will be developed over time as Reserved Matters applications are submitted, and the individual plots are built out.
- 6.7.3 WBC have also suggested that they collect a Section 106 contribution to enable the Council's Smarter Travel Choices Manager to monitor the Travel Plan and operate a strategic level plan which allows a co-ordinated approach to securing appropriate successful sustainable transport solutions throughout the area. A figure of a figure of £50k (£10k per year over 5 years) has been accepted to secure this service.
- 6.7.4 Furthermore, during scoping discussions, WBC made the Applicant aware of the Omega Transportation Steering Group. This is a collection of public and private sector bodies focused on the Omega Logistics development in north Warrington that come together 'To act as a conduit between all relevant parties to discuss and address transportation matters to maximise sustainable travel behaviours.'
- 6.7.5 It is accepted that a similar group would be established in relation to the Proposed Development.
- 6.7.6 The above initiatives are intended to encourage employees and visitors to choose alternative transport modes over single occupancy car use and, where possible, reduce the need to travel at all.
- 6.7.7 As the building occupants are not currently known, it is difficult to identify specific travel plan initiatives. However, the approach which has been taken, whereby a range of sustainable travel initiatives have been

derived, is in my opinion acceptable as it enables the future occupiers to pick the pre-identified initiatives which are best suited for their operational requirements.

- 6.7.8 A range of different travel plan communication modes have also been outlined to promote the initiatives and these include; employee induction packs, notice boards and promotional events.
- 6.7.9 As the development has not yet been constructed, it is not possible to undertake any travel surveys and provide a definitive set of targets. However, it is possible to provide an indication of potential targets along with indicative timescales. On this basis, a 10% reduction in single occupancy car trips associated with a 10% increase in trips by more sustainable modes over a five year period has been suggested within the Travel Plan.
- 6.7.10 If a modal shift of this scale did occur, it would potentially result in a lower level of traffic generation than that set out in the highway analysis, but for robustness this has not been included at this time.
- 6.7.11 The FTP provides a commitment to the delivery of an annual travel survey for a five-year period, pursuant to the creation of the first travel plan survey, approximately 6 months after the development becomes operational.
- 6.7.12 I am of the view that the Travel Plan and the support of WBC Smarter Choices Travel Team will be valuable tools for encouraging sustainable modes of travel and a reduction in single occupancy car trips.

6.8 Mitigation

- 6.8.1 I am of the view that the infrastructure and sustainable travel initiatives mentioned above will offer benefits and this is a view endorsed in Para 10.81 of the Committee report which states that ‘the improvements proposed as part of the development offer benefit in providing active travel connectivity to the Site.’
- 6.8.2 I am also of the view that all of the improvements are captured in what I believe are suitably worded conditions and planning obligations.

Obligations

- 6.8.3 Page 23 of the WBC Committee Report (**CD 4.149**) provides a useful summary of transport related planning obligations and states that WBC Transport Development Control has ‘no objections subject to a S106 obligation requiring the following:
- Contribution of £400k to deliver a Council-led scheme to provide foot/cycleway infrastructure linking the Site with Broad Lane, Barleycastle Lane
 - Contribution of £600k to deliver a public transport service meeting the needs of the Site and connecting with the wider area
 - Contribution of £50k to deliver the operation and monitoring of a Council-led strategic travel plan covering the entire Site to promote and support sustainable travel initiatives for future occupiers.’

Conditions

- 6.8.4 In addition to the obligations, a series of conditions are proposed as set out in the WBC Committee Report and some of these capture sustainable travel mitigation.
- 6.8.5 Condition 24 requires full details to be submitted to the Council in relation to the highway layout, carriageway dimensions, cycleways, footways, verges, visibility splays, access points, parking, surfacing and any highway structures.
- 6.8.6 Condition 25 requires a road phasing and completion plan and this needs to detail on-Site bus infrastructure.
- 6.8.7 Condition 26 requires details regarding the future maintenance and management of the proposed roads and internal footways.
- 6.8.8 Condition 28 requires schemes for the design and construction of:
- Two roundabout access points to B5356 Grappenhall Lane to the principles of Curtins Drawing Nos. 64076-CUR-00-XX-DR-TP-75002-P02 & 64076-CUR-00-XX-DRTP-75001-P03
 - Footway/Cycleway infrastructure along B5356 Grappenhall Lane between A50 Cliff Lane and a point 180m east of Broad Lane to the principles of Curtins Drawing No. 64076-CUR-00-XX-DR-TP-75014-P02;

- Improvements to PROW Nos. 23 & 28 including but not limited to surfacing in a bound material to ensure that the routes are passable and available for use throughout the year;
- Improvement works to the A50 Cliff Lane roundabout and the M6 J20 dumbbell roundabout to the principles of Curtins Drawing no. 64076-CUR-00-XX-DR -TP-75011/06, subject to inclusion of appropriate footway/cycleway infrastructure;
- Implementation and/or upgrade of street lighting necessary as part of the detailed design; and
- Drainage works necessary to facilitate the highway works.

6.8.9 As referenced earlier in this Proof, **Plan AV008** shows the location of all of the access improvements and mitigation on a single plan.

6.8.10 Condition 30 requires details of road gradients.

6.8.11 Condition 31 requires details of parking, including cycle parking.

6.8.12 Condition 32 requires a Travel Plan Coordinator.

6.8.13 Condition 33 requires a Travel Plan within 3 months of each unit opening.

6.8.14 Condition 34 requires details of a transport steering group to be submitted.

6.8.15 Condition 36 requires detail on electric vehicle charging.

6.8.16 Conditions 38 to 42 are suggested by NH and relate to the design and delivery of the M6 Junction 20 improvements.

6.9 Conclusion

6.9.1 Based on this section of my evidence I draw the following conclusions:

- It is acknowledged that opportunities for sustainable travel in the vicinity of the Site are currently limited. However, I consider this to be a factor of the Site location, remote from the existing settlement, which is typical of Sites appropriate for B8 logistical use, where a key requirement is good connectivity to the Strategic Road Network. Locating, B8 development adjacent to the strategic highway network also takes on site activities away from urban areas with residential populations.
- In my view, the question is not whether the Site is accessible, but whether the Site can be made to be accessible and offers a genuine choice of travel, as set out in the NPPF.
- Pedestrian and cycle infrastructure is proposed along the entire frontage of the Site and to the west of the Site in the form of a 3.5m shared pedestrian cycle route that is secured via a combination of condition and obligation.
- A contribution of £600,000 is proposed towards a bespoke bus service that will provide connections between the Site and areas

where the workforce live. This is comparable to the Land at Barleycastle Lane Site, where the Inspector found the provision of a comparable service and contribution to be in accordance with Core Strategy policies MP1, MP3, MP4, and MP7.

- A Framework Travel Plan has been prepared to encourage employees and visitors to choose alternative transport modes over single occupancy car use and, where possible, reduce the need to travel at all. This includes measures, targets, a management strategy and a financial contribution that has been accepted by WBC Highways.
- I conclude that the proposals provide benefits to active travel in the vicinity of the Site and the overall development represents sustainable development, from an accessibility perspective, and should be approved in accordance with the Core Strategy, the Neighbourhood Plan and Paragraph 11 of the NPPF and the ‘presumption in favour of sustainable development’.

7.0 The Highway Network and Impact of Development Proposals

7.1 Introduction

7.1.1 This section of my Proof considers the analysis that has been undertaken to assess the scheme against the policy context set out in **Section 5**.

7.1.2 It primarily seeks to demonstrate:

- Acceptability and agreement of key assessment parameters; and
- Compliance with NPPF Para 111.

7.2 Highway Safety

7.2.1 Section 2.4 of the June 2020 Updated Transport Assessment (**CD 4.3**) provided a comprehensive analysis of Personal Injury Accident data for the local and strategic highway network in the vicinity of the Site, using data obtained from WBC Highways for a period between July 2013 and July 2018.

7.2.2 The accident review also specifically focused on the Roundabout Junction of the B5356 and A50, the M6 Junction 20 Dumbbell Roundabouts and the on and off slip roads on the M6.

7.2.3 Section 2.49 concluded that:

‘there does not appear to be a common pattern of contributory factors of accidents recorded in this area, which have a relatively low frequency (three, fourteen, and eighteen accidents recorded respectively in a five-year period). None of the contributory factors recorded relate to the

features of the highway, instead it is mainly environmental factors and driver errors/impairment which are recorded as causes. It can be concluded that features of the highway at these junctions do not represent a specific safety issue.'

7.2.4 I am of the professional view that this is a reasonable conclusion and this position is supported by WBC Highways and National Highways who offered no objection.

7.2.5 Notwithstanding, I have undertaken a review of accidents that have occurred in the study area between 2018 and 2021, which is the most recent data available at the time of writing.

7.2.6 The results are set out in **Appendix AV009** and I conclude that nothing has changed between July 2018 and December 2021 that would alter my previous conclusion, that there are no unusual highway safety issues on the highway network.

7.3 Scope of Highways Impact Assessment

7.3.1 As a result of scoping discussions with WBC Highways and NH, a conventional forecasting methodology was agreed which utilises independent traffic surveys and stand-alone junction modelling software to consider key junctions in the immediate vicinity of the Site. The following junctions were considered:

- The A50 Cliff Lane / Lymm services roundabout;
- Both the M6 J20 Cliff Lane dumbbell roundabouts;
- The A50 Cliff Lane / Grappenhall Lane roundabout;

- Grappenhall Lane / Broad Lane roundabout;
- Grappenhall Lane / Barleycastle Lane;
- Broad Lane / Church Lane; and
- A50/A56.

7.3.2 Traffic surveys were undertaken at all of the above junctions in 2017 for a three-hour period covering the traditional morning peak period and a two-hour period covering the traditional evening peak period.

7.3.3 WBC and NH fully accepted the traffic data and I understand that NH have suggested utilisation of this dataset for another development in the area, where an application was submitted in 2023 (2023/00142/OUTM).

7.3.4 The highway network peak hour flows were derived from these surveys and the resulting flows are shown on the traffic figures that were prepared to support the application documentation.

7.3.5 In addition to this conventional assessment, WBC Officers requested utilisation of the Warrington Multi Modal Transport Model (WMMTM) for consideration of the wider highway network and also the emerging Local Plan. This is considered later in this Proof and the below text relates purely to the conventional assessment.

7.4 Assessment Years

7.4.1 All assessments of highway impact are based on an opening year of 2021 and a design horizon of 2029, which is ten years after the year of application. This was an agreed matter with WBC Highways and NH as demonstrated by their position of no objection.

7.4.2 Given the time that has passed since the application was submitted, it is acknowledged that an opening year of 2021 is not achievable. Notwithstanding an assessment year of 2029 was considered and as this is still 6 years away at the time of writing it is still valid and robust.

7.5 Traffic Growth Factors

7.5.1 Traffic Growth Factors for the 2021 and 2029 assessment years were derived via the National Traffic Model (NTM) and Trip End Model Presentation Program (TEMPro) for the Warrington area. This is in accordance with industry best practice.

7.5.2 The full methodology adopted is set out in detail within the June 2020 Updated Transport Assessment (**CD 4.3**) paragraphs 6.4.16 to 6.4.37. This concluded that background traffic flows across the highway network were predicted to increase by circa 2% by 2021 and circa 9% by 2029 in both the AM and PM peak periods.

7.5.3 This increase is in addition to the traffic generated by committed development in the area.

7.5.4 To put a 9% increase into context, there are circa 5,000 vehicles travelling on M6 Junction 20 dumbbell roundabouts during the AM and PM peak period and a 9% increase would therefore equate to circa 450 additional vehicles at this junction alone.

7.5.5 Considering a blanket 9% increase in traffic on each arm of each junction, in addition to committed developments is in my opinion overly

robust and an element of double counting is more than likely captured in the figures.

7.5.6 It is my professional view that the methodology used to determine background growth and its application is robust and neither WBC Highways or NH have disputed this based on their position of no objection.

7.6 Committed Development

7.6.1 In addition to the background growth captured by TEMPro, individual committed developments have also been considered as set out below:

- Land off Pewterspear Green Road – 180 dwellings (Application Ref 2016/28807);
- Appleton Cross – Mixed use scheme including 370 dwellings (Application Ref 2017/29930);
- Grappenhall Heys – 400 dwellings (Application Ref 2017/29929); and
- Land to the East of Stretton Road - 74 Dwellings (Application Ref 2017/31848)

7.6.2 The traffic flows for the committed developments were sourced from the respective Transport Assessments available at the time.

7.6.3 It is my professional view that the methodology used to extract committed development flows and their application is robust and neither WBC Highways or NH have disputed this.

7.6.4 In addition to the committed development set out above, the assessment also included a sensitivity test at the request of WBC Highways and NH to take account of a potential logistics development (Land North of Barleycastle Lane) to the west of the Site.

7.6.5 Full details of the sensitivity test are included in Section 6.4.9 to 6.4.15 of the June 2020 Updated Transport Assessment, albeit it must be stressed that this proposal has since been dismissed at Appeal. Therefore, the inclusion of this data results in an overly robust assessment.

7.7 Trip Rates

7.7.1 The trip rates used in the June 2020 Updated Transport Assessment were derived based on traffic surveys undertaken at Omega North in Warrington in 2018. Full details are set out in Table 6.2 of the June 2020 Updated Transport Assessment **(CD 4.3)**.

7.7.2 Utilisation of these rates was requested by WBC Highways and NH during pre-application scoping discussions and I consider them appropriate for use.

7.8 Distribution and Assignment

7.8.1 The distribution of staff development traffic is based on 2011 census journey to work data for the Middle Super Output Area that includes Stretton Green Distribution Park, with manual route choice decisions (assignment) made based upon local knowledge and Google routing software.

- 7.8.2 With regard to the distribution of HGV-related trips, and as agreed with NH / WBC during scoping discussions, it is considered that all development-related HGVs will route exclusively between the Site and the strategic highway network at the M56 / M6 Lymm Interchange.
- 7.8.3 The addition of comprehensive mitigation at the M6 Junction 20, further enhances the appeal of this junction as the primary route to the SRN for all types of vehicles.
- 7.8.4 It is my professional view that this is an acceptable methodology and neither WBC Highways or NH have objected.

7.9 Conventional Capacity Assessments

- 7.9.1 The parameters set out in the previous sections of this Proof were used to undertake junction modelling as per the agreed scope.
- 7.9.2 A full summary of the agreed modelling results is provided in Section 8 of the June 2020 Updated Transport Assessment.
- 7.9.3 Rather than reproduce the modelling outputs here, I have sought to provide a concise summary below.

Site Access Roundabouts

- 7.9.4 The agreed modelling demonstrates that in both the 2021 and 2029 AM and PM peak hour scenarios, the junctions operate within capacity.

Broad Lane/Church Lane Priority Junction

- 7.9.5 The agreed modelling demonstrates that the junction operates within capacity during both the AM and PM peaks at both 2021 and 2029.

Broad Lane / B5356 Grappenhall Lane Roundabout

- 7.9.6 The agreed modelling demonstrates that the junction will operate within capacity during both the AM and PM peaks in 2021. By 2029 the junction will still operate within capacity albeit one arm is close to capacity in the PM peak period. I do not consider the increase in queuing to be severe.
- 7.9.7 WBC Highways share this view and Para 10.88 of the Committee Report states

‘It is not considered that mitigation to improve capacity at the junction is necessary as a result of the proposed development.’

A50 Knutsford Road / A56 Chester Road Signalised Junction

- 7.9.8 The agreed modelling demonstrates that some arms of the junction are predicted to operate at or close to capacity in the 2021 and 2029 base years. The addition of the development contributes to a slight worsening of performance at the junction, albeit the changes to queuing and the level of delay experienced is not considered to be severe.
- 7.9.9 This view is shared by WBC Highways with Para 10.90 of the Committee Report stating that:

‘The modelling results confirm that some arms of the junction operate over practical capacity in the 2021 base year and over theoretical capacity in the 2029 base year. The proposed development does impact on the junction particularly in the future 2029 scenario, however, the number of movements added by the development is not considered significant. The junction is a traffic signal junction which is controlled by an intelligent independent control system (MOVA) which maximises vehicle throughput and it is not considered that any specific mitigation is required as a result of the development.’

The A50 Cliff Lane / B5356 Grappenhall Lane Roundabout and the M6 J20 Roundabouts

- 7.9.10 A traffic model of the three roundabouts that lie between the Site and the M56 / M6 motorway was developed as part of the assessment.
- 7.9.11 Whilst the roundabout junctions at the A50 Cliff Lane / Grappenhall Lane and the M6 J20 are the responsibility of WBC, the slip roads at the M6 J20 (up to the gyratory entry and exit points) are the responsibility of NH.
- 7.9.12 As there is some peak hour queue interaction between the M6 J20 western dumbbell roundabout and the A50 Cliff Lane / B5356 Grappenhall Lane roundabout, the junctions were modelled as linked using LinSig, as agreed during scoping discussions.
- 7.9.13 A 2017 base model was validated and agreed as being appropriate after extensive review by NH and their consultants.

- 7.9.14 The base year results demonstrated that the junction did experience some level of congestion in the traditional AM and PM peak periods, which matched on Site observations and queuing.
- 7.9.15 Outside of the traditional morning and evening peak periods, the traffic flows are significantly lower and congestion does not occur to the same extent. I base this comment on my observations from circa 10 site visits over several years at different times of the day. Most recently I visited the Site at circa 8PM on the 23rd February 2023 and 11.30 AM on 20th March 2023. At both times the junctions were operating under free flow conditions with no queuing or delay.
- 7.9.16 The agreed modelling demonstrates that by 2021 and 2029 the addition of background traffic and committed development in the area resulted in increased queuing and delay during the traditional AM and PM peak periods and the addition of the development traffic would further increase the queuing and delay on some arms.
- 7.9.17 The above results suggested that improvements would be required in order to mitigate the impact of the development traffic on the highway network.
- 7.9.18 A comprehensive improvement scheme for the A50 Cliff Lane / B5356 Grappenhall Lane roundabout and the M6 J20 dumbbell roundabouts was proposed as shown on 64076-CUR-00-XX-DR-TP-75011-P06 **(Appendix AV005)**. This includes:

- Relocation and realignment of the A50 Cliff Lane roundabout to the west of its existing location to enhance the storage capacity of the link between the roundabout and the motorway;
- Full signalisation of the new realigned A50 Cliff Lane roundabout with widening of all approach arms and reduction of the exit arm onto the A50 to one lane;
- Widening of the A50 link between the A50 Cliff Lane roundabout to provide two lanes for much of the links length;
- Partial signalisation of the two M6 J20 dumbbell roundabouts;
- Widening of the M6 Northbound off-slip;
- Widening of the circulatory carriageway on the two M6 J20 dumbbell roundabouts and rationalisation of the lane markings / directional arrows, implementation of a yellow box and installation of queue detectors;
- Incorporating MOVA delay management (or equivalent technology) and appropriate queue detection; and
- Widening on the eastern approach to the dumbbell roundabouts.

7.9.19 The above mitigation is also shown on **Plan AV008**.

7.9.20 The mitigation is partly based on the mitigation prepared in support of the Land North of Barleycastle Lane application, albeit the scheme has been expanded utilising land that was not available on that project. All land that is necessary to deliver the improvements is either under the control of the Applicant, NH or WBC Adopted Highway.

- 7.9.21 The mitigation was modelled and again went through a robust review process by NH and their consultant team.
- 7.9.22 The results of the mitigation modelling demonstrated that even with the addition of the Land North of Barleycastle Lane scheme, the junction is predicted to operate with levels of queuing and delay that are better or comparable to the 2021 and 2029 without development base years.
- 7.9.23 WBC Highways are in agreement with this position as evidenced in Para 10.86 of the Committee Report which states that:
- ‘Modelling of the proposed improvement scheme indicates that the scheme will offer benefit such that the junction network will operate more efficiently than the without development scenario. There can be no expectation that a development should mitigate existing issues but it is reasonable and expected that any proposal should not exacerbate an existing issue and that where capacity issues are already experienced the development should mitigate its own impact. It is considered that the improvement scheme achieves this nil detriment impact scenario. This improvement scheme can be secured via condition.’
- 7.9.24 National Highways are also in agreement as evidenced in the SoCG. The position is also set out, along with the conditions, in the final NH consultation response (**CD 4.73**) dated 15th February 2021.
- 7.9.25 It is my professional view that the proposed mitigation scheme provides benefits that fully mitigate the impact of the Proposed Development at

this junction and the impact could not be considered severe in the context of NPPF.

7.10 Warrington Multi Modal Model

7.10.1 In addition to the conventional modelling summarised above, WBC Highways also asked for an assessment using the WMMTM. Full details are set out in Section 7 of the June 2020 Updated Transport Assessment.

7.10.2 The WMMTM was developed to test the emerging Submission Version of the Local Plan and the Consultation 18 documentation that was available at the time of the modelling states that the WMMTM is a software tool, based on SATURN software, which will:

‘enable the Council to consider local and borough wide transport impacts arising from new development. It will also allow the Council to confirm the infrastructure required to mitigate these impacts and contribute to the wider New City concept’.

7.10.3 It was agreed during scoping discussions that Curtins would extract data from the model, but the flows would not be used in individual junction assessments. Instead the change in flows at up to 15 individual junctions should be used as guide for whether further conventional assessment is necessary.

7.10.4 I do not consider it appropriate to set out the full results here, but these are contained in Section 7 of the TA **(CD 4.3)**.

7.10.5 After due consideration of the WMMTM outputs it was considered that the conventional flows were more robust and appropriate for decision making purposes and should be used as the basis for detailed capacity assessments.

7.10.6 The committee report supports the TA findings and states at Para 10.84 that:

‘Warrington Multi-modal Transport Model (WMMTM) has also been used to consider potential development impact throughout the wider area and there are some variations in potential route choice, primarily due to the nature of the WMMTM as a large strategic model. The use of the WMMTM route choice assumptions have been considered to identify potential impacts on junctions that have not been specifically identified for detailed capacity analysis. The findings of the TA in this respect are accepted.’

7.10.7 It is my professional view that the WMMTM does not alter the conclusions of the conventional modelling set out in this section of the Proof.

7.11 Junction Mitigation Summary and Conditions

7.11.1 It is noted from the above section of my Proof that junction mitigation has been identified in the form of the Site access roundabouts and the A50 Cliff Lane / B5356 Grappenhall Lane Roundabout and the M6 J20 Roundabouts

7.11.2 All of the mitigation is captured in what I believe are suitably worded conditions.

7.11.3 NH have also suggested a series of conditions as summarised in the final NH consultation response **(CD 4.73)** dated 15th February 2021.

7.12 Conclusion

7.12.1 Based on this section of my evidence I draw the following conclusions:

- An extensive scope of assessment was agreed with highway officers at WBC and NH, and considered as part of the planning application.
- A series of robust parameters have been agreed regarding assessment years, traffic growth and committed development. These are fully agreed with Highways Officers at WBC and NH.
- Extensive traffic modelling has been undertaken as part of the application process and this demonstrates that, subject to appropriate mitigation, impacts are not severe in accordance with NPPF Para 111.
- Deliverable highway mitigation has been agreed with Highways Officers and can be secured by appropriately worded conditions.

7.12.2 I have formed a view that the proposals do not represent unacceptable highway safety or severe impacts in the context of NPPF Para 111 and

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there are no highway capacity issues that should prevent approval of
the application.

8.0 Interested Parties and Rule 6 Party

- 8.1.1 I am aware that there are a number of interested parties that have raised traffic and transport matters on the run up to this Inquiry.
- 8.1.2 I have reviewed each of the representations and I am of the general view that most of the comments are addressed in the application documentation or this Proof. However, to assist the Inspector I have provided a summary of the comments and any specific responses in **Appendix AV 010.**
- 8.1.3 I am also aware that the South Warrington Parishes Local Plan Working Group (SWP) has been granted Rule 6 status. At the time of writing, I have not seen any specific evidence produced by SWP.

9.0 Summary and Conclusions

- 9.1.1 This document is a Proof of Evidence that is submitted to the Inquiry in relation to an Outline Planning Application (2019/34799) with all matters reserved apart from access, as summarised below in the planning description.

‘Construction of up to 287,909m² (gross internal) of employment floor space (Use Class B8 and ancillary B1(a) offices), demolition of existing agricultural outbuildings and associated servicing and infrastructure, including car parking and vehicle and pedestrian circulation, alteration of existing access road into the Site including works to the M6 junction 20 dumbbell roundabout and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station and ecological works.’

- 9.1.2 The planning application was supported by a Transport Assessment, a Traffic and Transport Environmental Statement Chapter and a Framework Travel Plan. In preparing these documents extensive discussions were held with Warrington Borough Council (WBC) Highways and National Highways (NH).
- 9.1.3 Additional analysis was undertaken following the submission of the planning application in advance of the consideration of the application by WBC. This demonstrated that with the proposed mitigation, the development would not result in significant highway impacts that would warrant refusal.

- 9.1.4 Prior to determination of the application, agreement was reached with Warrington Borough Council (WBC) and National Highways (NH) that the proposed development would not give rise to unacceptable traffic and transport impacts, subject to the implementation of agreed mitigation.
- 9.1.5 At the meeting of its Development Management Committee held on Thursday 10th March 2022, WBC resolved to grant planning permission for the Development.
- 9.1.6 The application was referred to the Secretary of State, who after initially having directed that the application should be determined by WBC, subsequently reconsidered matters and called the application in for his own determination by letter dated 22nd November 2022.
- 9.1.7 This call-in decision gives rise to a public inquiry, the subject of this Proof of Evidence.
- 9.1.8 In **Section 5** I considered the National and Local policy context in and conclude that that there are two fundamental requirements that must be achieved. Firstly, does the development represent sustainable development in accordance with the National Planning Policy Framework (NPPF) and the Core Strategy. Secondly, will the development result in an unacceptable impact on highway safety or residual cumulative impacts that are severe as set out in NPPF Para 111.

9.1.9 In **Section 6**, I demonstrate that the Site can be made to be sustainable via the delivery of a package of sustainable enhancements. This includes:

- Pedestrian and cycle infrastructure along the entire frontage of the Site and to the west of the Site in the form of a 3.5m shared pedestrian cycle route that is secured via a combination of condition and obligation.
- A contribution of £600,000 towards a bespoke bus service that will provide connections between the Site and areas where the workforce live.
- A Travel Plan and the establishment of a Transport Steering Group, to be partly secured via condition and obligation.

9.1.10 In **Section 7**, I set out that detailed modelling has been undertaken at and this demonstrates that there would be no severe impact on the operation of the highway network, subject to appropriate mitigation.

9.1.11 Mitigation has been identified in the form of a comprehensive improvement scheme for the A50 Cliff Lane / B5356 Grappenhall Lane roundabout and the M6 J20 dumbbell roundabouts as shown in **Appendix AV005**.

9.1.12 This mitigation scheme is conditioned and is considered to be deliverable.

9.1.13 In conclusion, there would be no severe residual cumulative impact arising from traffic associated with the proposed development and

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therefore in line with the NPPF the proposed development should not
be refused on transport grounds.

Local Planning Authority Application Reference:
2019/34799

Planning Inspectorate Reference:
APP/M0655/V/22/331187

**Land to the west of Junction 20 of the M6
Motorway and Junction 9 of the M56
Motorway and to the south of Grappenhall
Lane and Cliff Lane, Grappenhall, Warrington
– known as Six:56**

Proof of Evidence Appendices

Alex Vogt BSc (Hons), MSc, TPP, FCIHT

Curtins Ref: 83081

Revision: V03

Issue Date: 04 April 2023

Applicant Name: Langtree Property Partners LLP

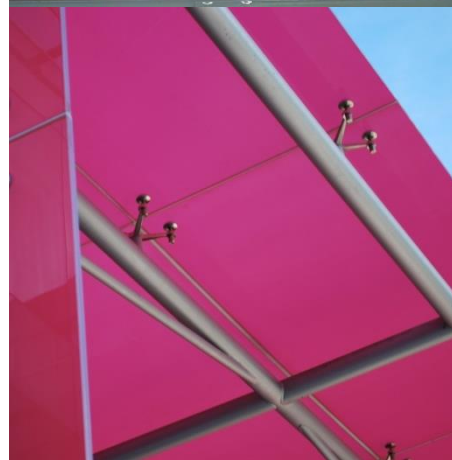
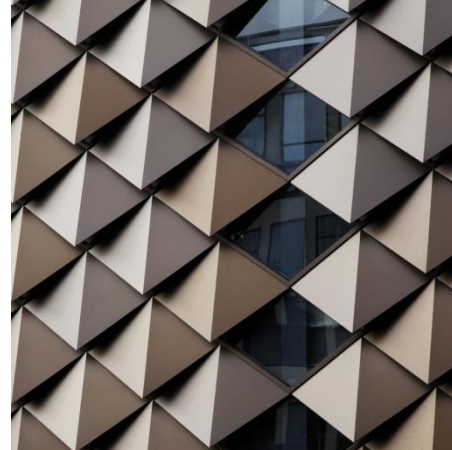


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Appendix AV001 – Summary Proof of Evidence

Local Planning Authority Application Reference:
2019/34799

Planning Inspectorate Reference:
APP/M0655/V/22/331187

**Land to the west of Junction 20 of the M6
Motorway and Junction 9 of the M56
Motorway and to the south of Grappenhall
Lane and Cliff Lane, Grappenhall, Warrington
– known as Six:56**

Summary Proof of Evidence

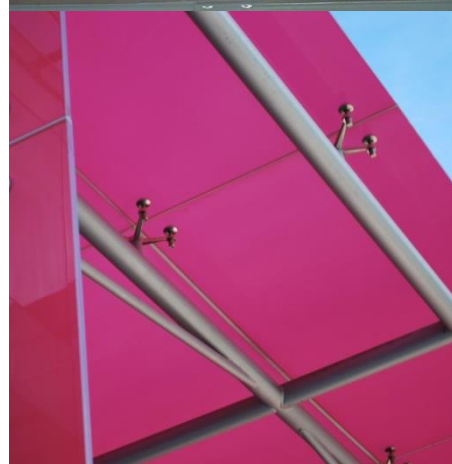
Alex Vogt BSc (Hons), MSc, TPP, FCIHT

Curtins Ref: 83081

Revision: V01

Issue Date: 28 March 2023

Applicant Name: Langtree Property Partners LLP



1.0 Summary and Conclusions

- 1.1.1 This document is a Proof of Evidence that is submitted to the Inquiry in relation to an Outline Planning Application (2019/34799) with all matters reserved apart from access, as summarised below in the planning description.

‘Construction of up to 287,909m² (gross internal) of employment floor space (Use Class B8 and ancillary B1(a) offices), demolition of existing agricultural outbuildings and associated servicing and infrastructure, including car parking and vehicle and pedestrian circulation, alteration of existing access road into the Site including works to the M6 junction 20 dumbbell roundabout and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station and ecological works.’

- 1.1.2 The planning application was supported by a Transport Assessment, a Traffic and Transport Environmental Statement Chapter and a Framework Travel Plan. In preparing these documents extensive discussions were held with Warrington Borough Council (WBC) Highways and National Highways (NH).
- 1.1.3 Additional analysis was undertaken following the submission of the planning application in advance of the consideration of the application by WBC. This demonstrated that with the proposed mitigation, the development would not result in significant highway impacts that would warrant refusal.

- 1.1.4 Prior to determination of the application, agreement was reached with Warrington Borough Council (WBC) and National Highways (NH) that the proposed development would not give rise to unacceptable traffic and transport impacts, subject to the implementation of agreed mitigation.
- 1.1.5 At the meeting of its Development Management Committee held on Thursday 10th March 2022, WBC resolved to grant planning permission for the Development.
- 1.1.6 The application was referred to the Secretary of State, who after initially having directed that the application should be determined by WBC, subsequently reconsidered matters and called the application in for his own determination by letter dated 22nd November 2022.
- 1.1.7 This call-in decision gives rise to a public inquiry, the subject of this Proof of Evidence.
- 1.1.8 In **Section 5** I considered the National and Local policy context in and conclude that that there are two fundamental requirements that must be achieved. Firstly, does the development represent sustainable development in accordance with the National Planning Policy Framework (NPPF) and the Core Strategy. Secondly, will the development result in an unacceptable impact on highway safety or residual cumulative impacts that are severe as set out in NPPF Para 111.

1.1.9 In **Section 6**, I demonstrate that the Site can be made to be sustainable via the delivery of a package of sustainable enhancements. This includes:

- Pedestrian and cycle infrastructure along the entire frontage of the Site and to the west of the Site in the form of a 3.5m shared pedestrian cycle route that is secured via a combination of condition and obligation.
- A contribution of £600,000 towards a bespoke bus service that will provide connections between the Site and areas where the workforce live.
- A Travel Plan and the establishment of a Transport Steering Group, to be partly secured via condition and obligation.

1.1.10 In **Section 7**, I set out that detailed modelling has been undertaken at and this demonstrates that there would be no severe impact on the operation of the highway network, subject to appropriate mitigation.

1.1.11 Mitigation has been identified in the form of a comprehensive improvement scheme for the A50 Cliff Lane / B5356 Grappenhall Lane roundabout and the M6 J20 dumbbell roundabouts as shown in **Appendix AV005**.

1.1.12 This mitigation scheme is conditioned and is considered to be deliverable.

1.1.13 In conclusion, there would be no severe residual cumulative impact arising from traffic associated with the proposed development and

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therefore in line with the NPPF the proposed development should not
be refused on transport grounds.

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Appendix AV002 – Plans

Plan AV001 – Regional Site Location Plan

Plan AV002 – Local Site Location Plan

Plan AV003 – PROW Network

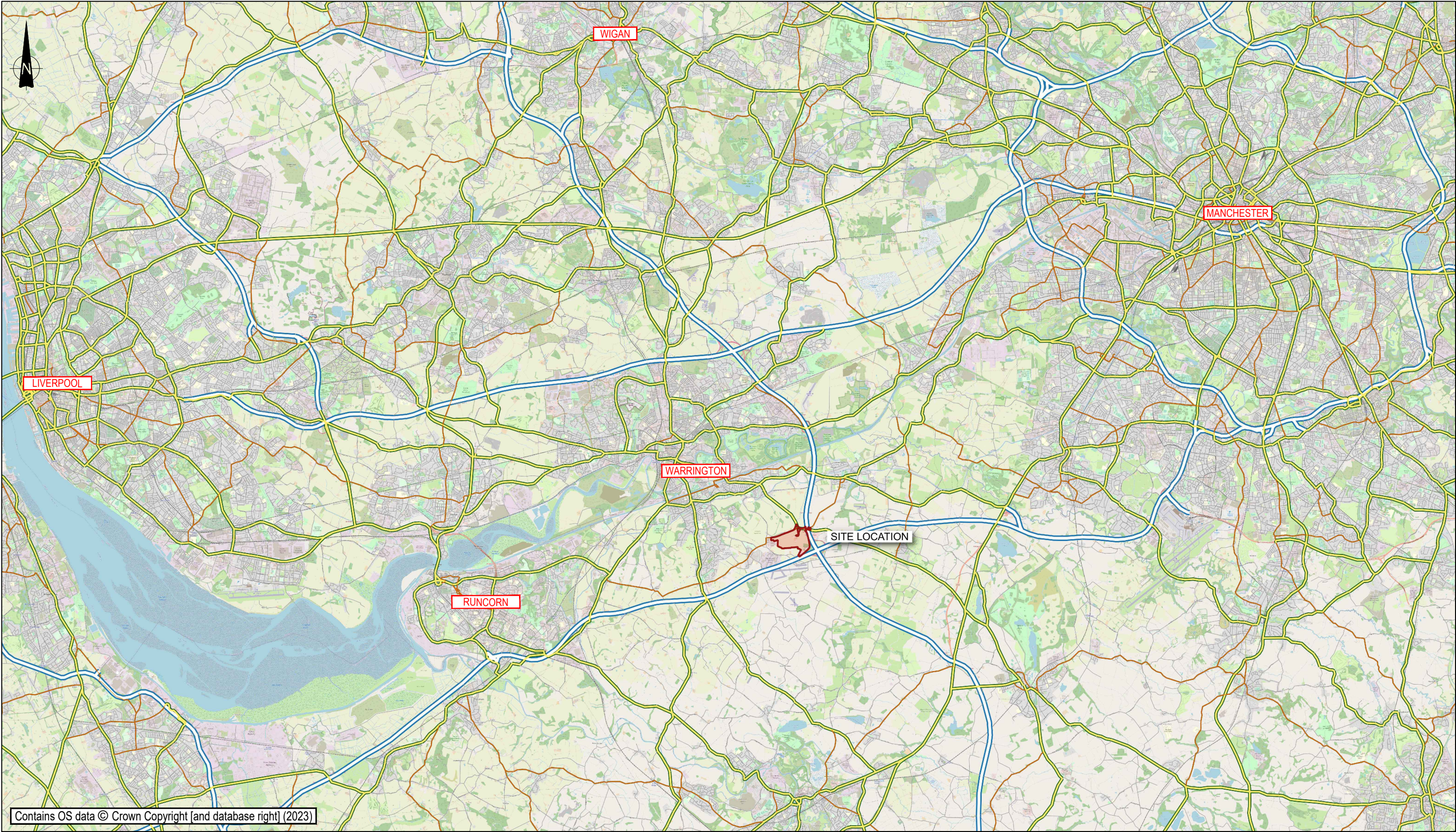
Plan AV004 – Strategic Road Network

Plan AV005 – Pedestrian Catchment

Plan AV006 – Cycling Catchment

Plan AV007 – WBC Cycle Network

Plan AV008 – Highway Improvements Plan



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Site



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Project:		SIX:56		Status:		PRELIMINARY	
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				Designed By:	JM	Date:	09/03/23
				Scale:	NTS		
Project No:	Originator:	Volume:	Level:	Type:	Role:	Category / Number:	Rev:
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Project:

SIX:56

Status:

PRELIMINARY

Drg Title:

LOCATION PLAN
LOCAL LEVEL

Drawn By: JM

Checked By: AV

Designed By: JM

Date: 09/03/23

Scale: NTS

Project No:

Originator:

Volume:

Level:

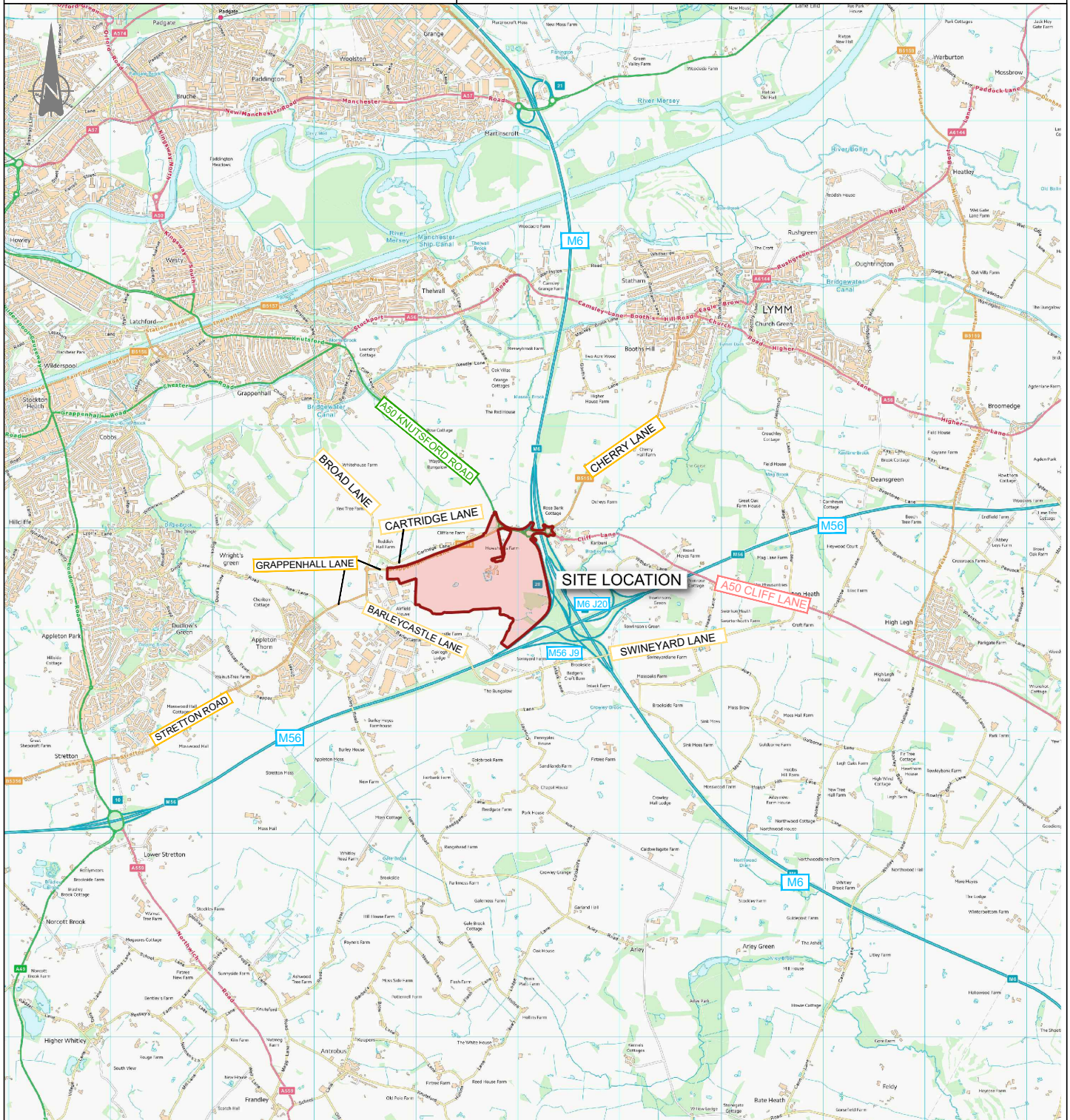
Type:


Role:

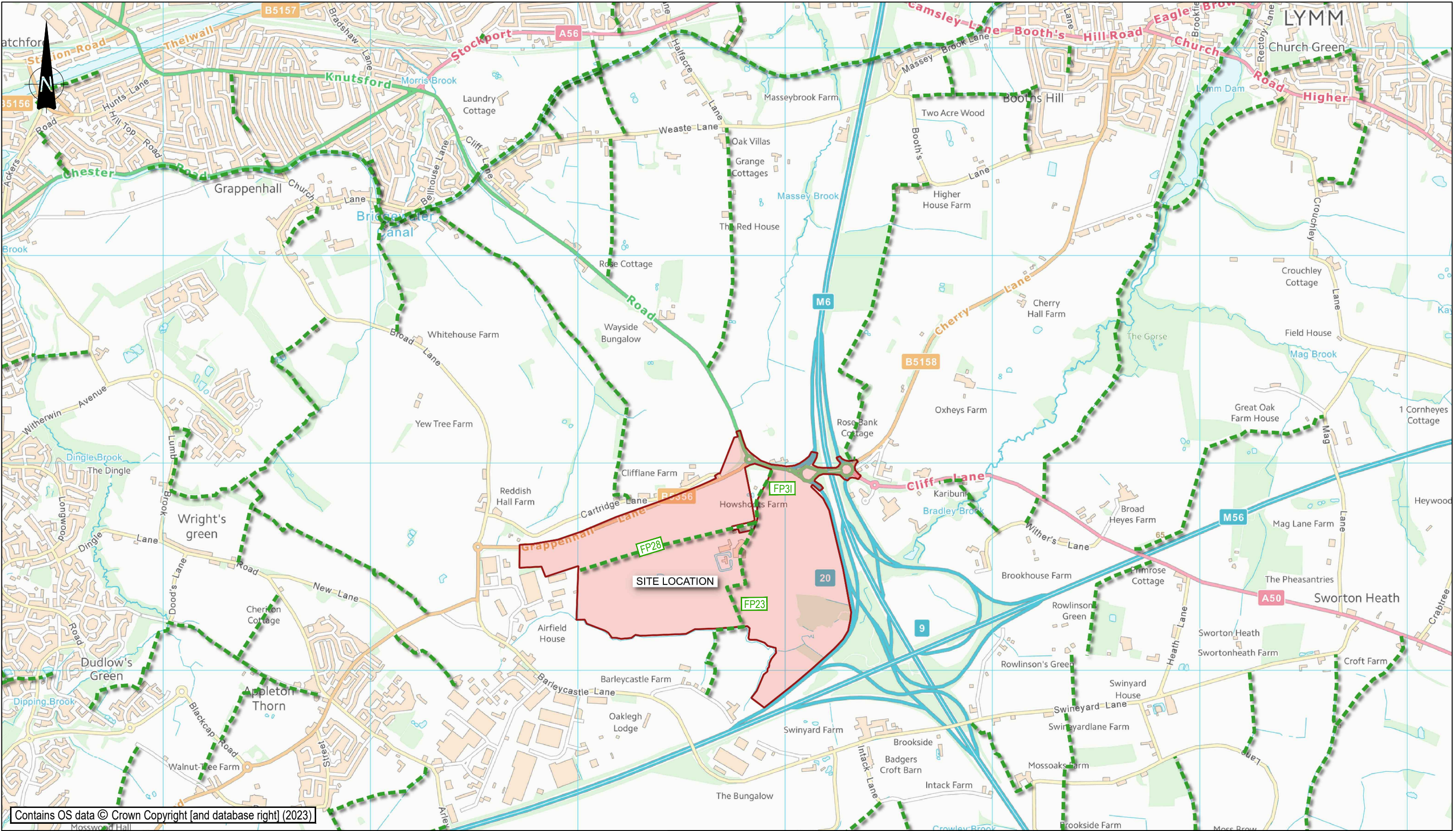
Category / Number:

Rev:

83081 - CUR - XX - XX - G - TP - 06002 - P01



KEY:  Site



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- KEY:
- Site
 - PRoW

1) Public Right of Way routes based on Warrington MBC's online records. Sourced 2023



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Project:		SIX:56		Status:		PRELIMINARY	
Drg Title:		PUBLIC RIGHTS OF WAY		Drawn By:	JM	Checked By:	AV
				Designed By:	JM	Date:	09/03/23
				Scale:	NTS		
Project No:	Originator:	Volume:	Level:	Type:	Role:	Category / Number:	Rev:

83081 - CUR - XX - XX - G - TP - AV003 - P01

GENERAL NOTES:	Rev:	Description:	Date:	By:	Chkd:
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Project:

SIX:56

Status:

PRELIMINARY

Drg Title:

ACCESSIBILITY PEDESTRIAN CATCHMENT PLAN

Drawn By: JM

Checked By: AV

Designed By: JM

Date: 09/03/23

Scale: NTS

Project No:

Originator:

Volume:

Level:

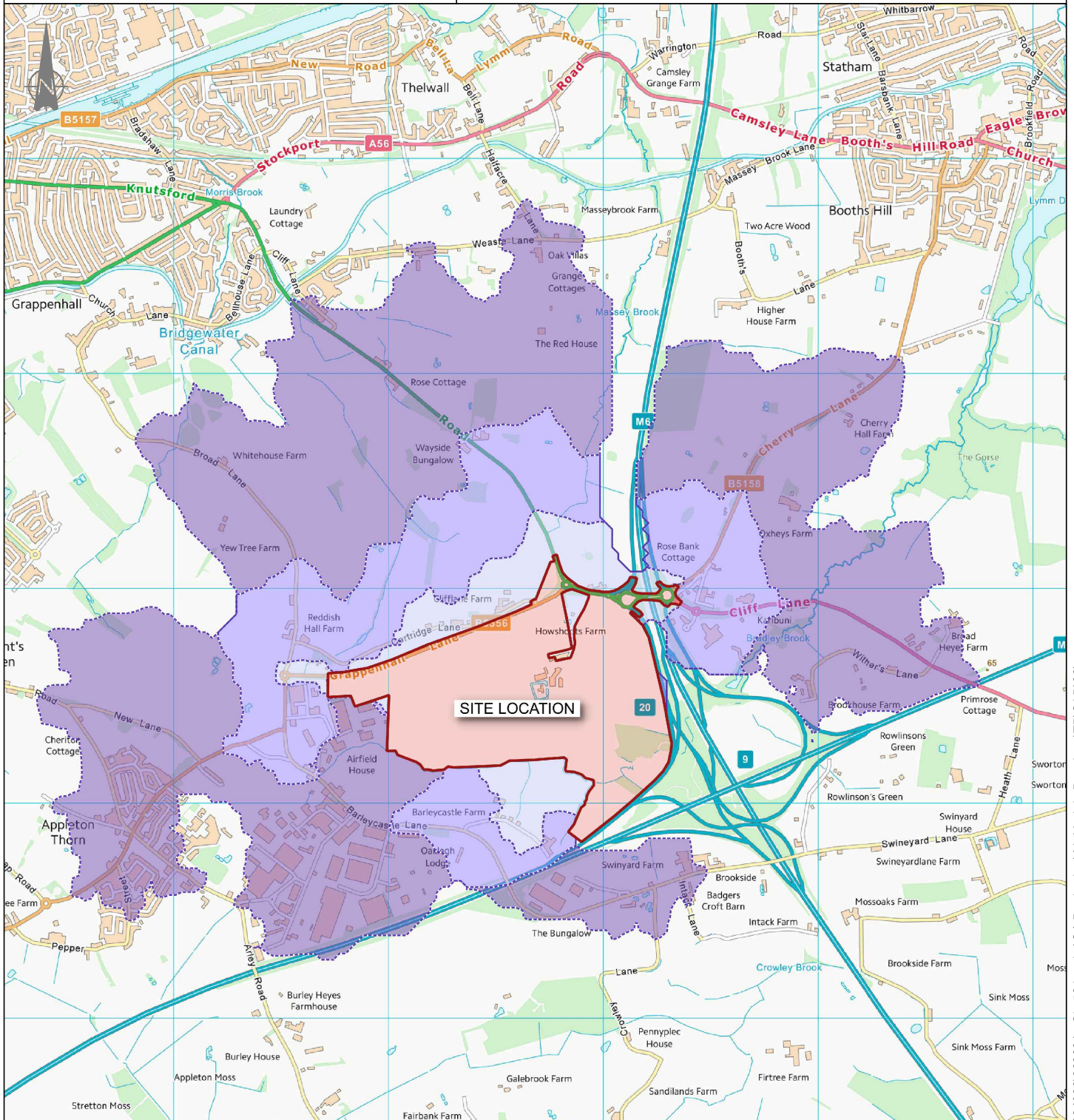
Type:

Role:

Category / Number:

Rev:

83081 - CUR - XX - XX - G - TP - AV005 - P01



KEY: Site

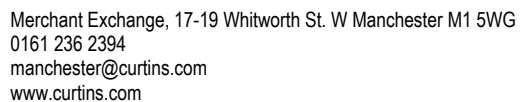
Walking Catchment

2000m

1000m

500m

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Project:

SIX:56

Status:

PRELIMINARY

Drg Title:

ACCESSIBILITY CYCLE CATCHMENT PLAN

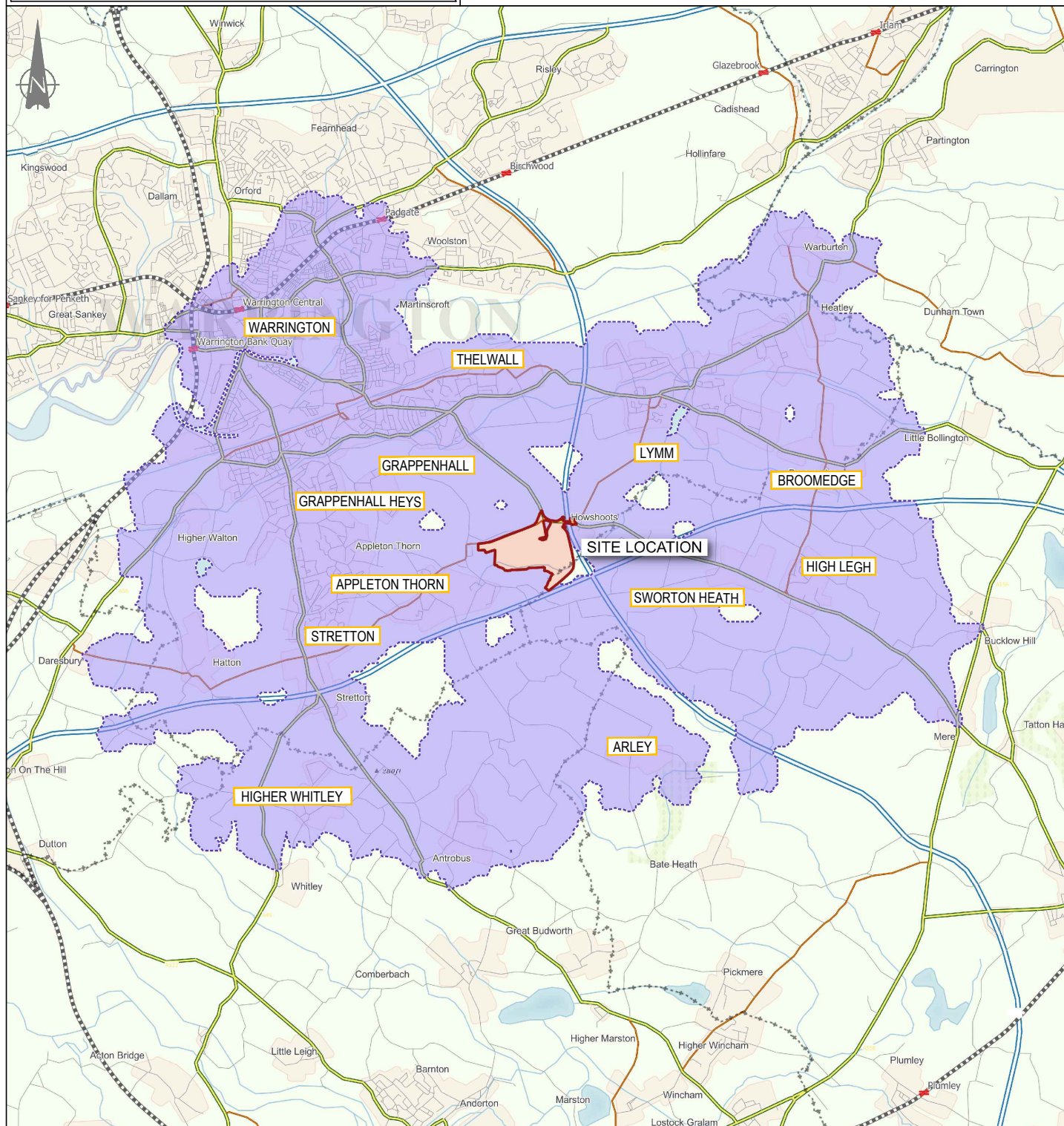
Drawn By: JM	Checked By: AV
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Designed By: JM Date: 09/03/23

Scale: NTS

Project No: Originator: Volume: Level: Type: Role: Category / Number: Rev:

83081 - CUR - XX - XX - G -TP - AV006 - P01



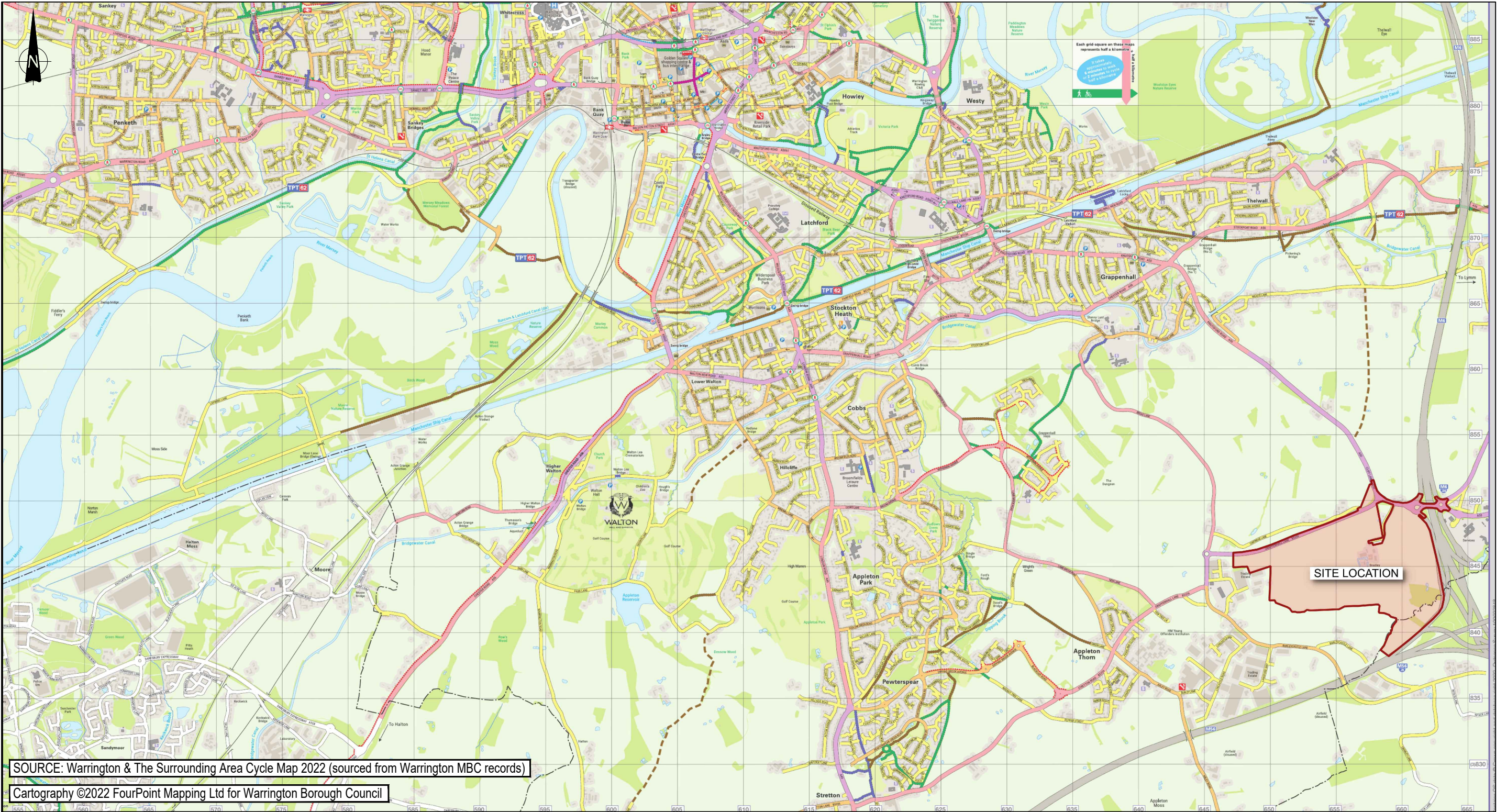
KEY: Site

Cycling Catchment:

 8000m

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\\mafs02\Projects\083001 - 084000\083081 - Six 56 Inquiry\Q4-Production\4A-Models-Drawings\TPICAD\06\



SOURCE: Warrington & The Surrounding Area Cycle Map 2022 (sourced from Warrington MBC records)

Cartography ©2022 FourPoint Mapping Ltd for Warrington Borough Council

- Hard surface cycle paths
Unsurfaced cycle paths
Bridleway
Pedestrian links
Shared-use cycle path
Protected cycle lane
Pedestrian & Cycle Zone
Motorway
One way / One way with contra flow cycling permitted
National Cycle Network route number & Trans-Pennine Trail
Railway station
Bus interchange
Schools
Colleges
Hospital
Library
Supermarket
Cycle parking
Bike shop
Bridge
Pedestrian crossing
Toucan crossing
Underpass
Wheeling ramp
- Roads graded —————> Increasing difficulty
Cycleability gradations, in increasing experience
1 2 3 4

GENERAL NOTES:

Rev:

Description:

Date:

By:

Chkd:



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Project:

SIX:56

Drg Title:

LOCAL CYCLE NETWORK

Status:

PRELIMINARY

Drawn By:

JM

Designed By:

JM

Scale:

NTS

Project No:

Originator:

Volume:

Level:

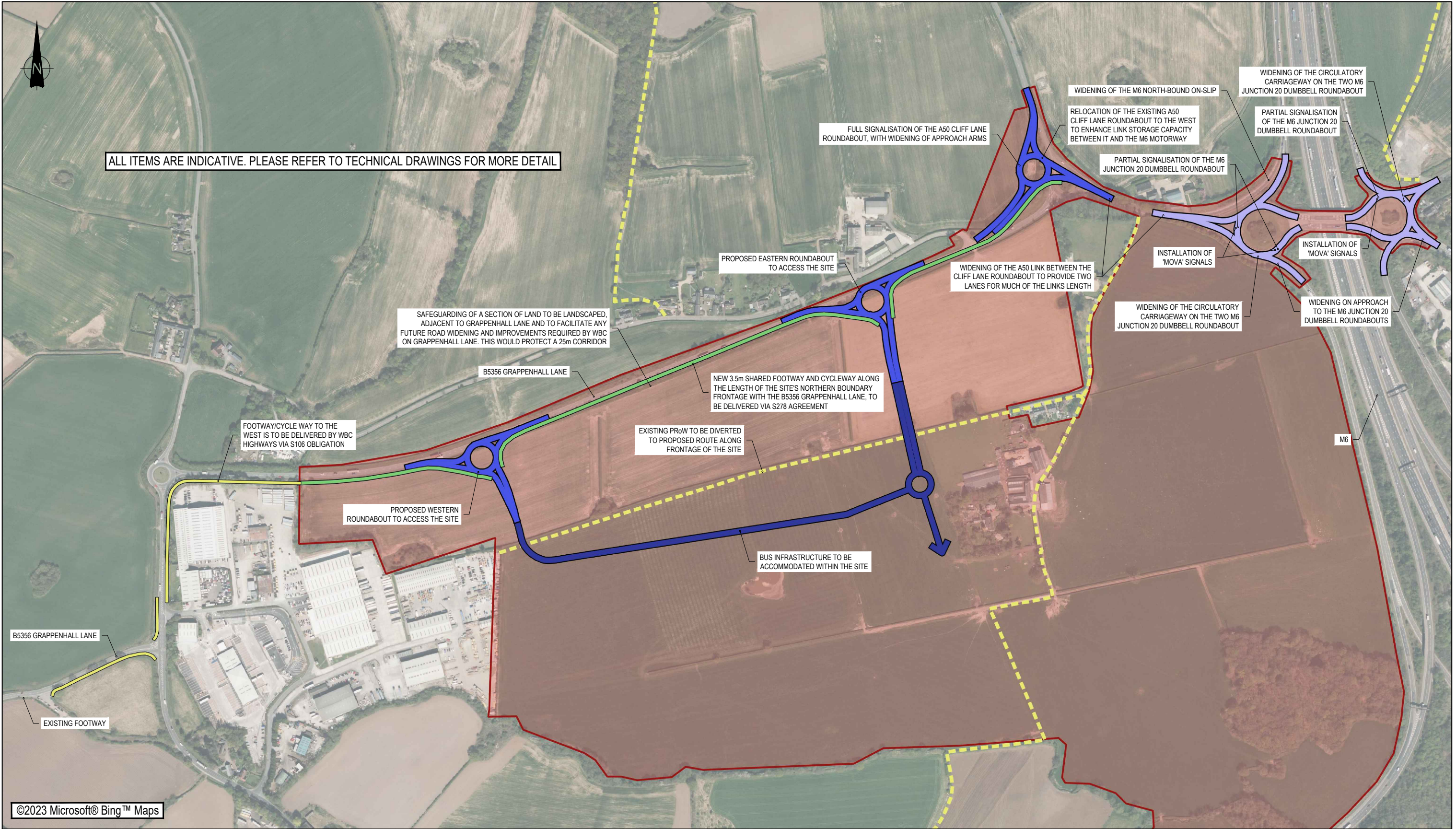
Type:

Role:

Category / Number:

Rev:

83081 - CUR - XX - XX - G - TP - AV007 - P01



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- Site Boundary
- Existing PRoW
- Proposed Internal Highway

- Proposed Highways Mitigation:
- Improvements to Roundabout
 - Proposed Roundabout

- Proposed Sustainable Links:
- Shared Footway/Cycleway (S278)
 - Shared Footway/Cycleway (S106)

GENERAL NOTES:	Rev:	Description:	Date:	By:	Chkd:
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Project:	SIX 56	Status:	PRELIMINARY			
Drg Title:	PROPOSED HIGHWAY IMPROVEMENTS		Drawn By:	DD	Checked By:	AV
			Designed By:	DD	Date:	24/03/23
			Scale:	NTS		
Project No:	Originator:	Volume:	Level:	Type:	Role:	Category / Number:
83081	- CUR	- XX	- XX	- G	- TP	- AV008 - P01

\\mats02\Projects\083001 - 084000\083081 - SIX 56 Inquiry\Q4-Production\4A-Models-Drawings\TP\CAD\061

83081 Land to the west of Junction 20 of the M6
Motorway and Junction 9 of the M56 Motorway and to the
south of Grappenhall Lane and Cliff Lane, Grappenhall,
Warrington – known as Six:56



Appendix AV003 – Illustrative Masterplan (16-184-F013-001)

Plot No.	Warehouse GIA		Hub		Office		Total GIA		Haunch Height	Ridge Height	Dock Drs.	Level Access Drs.	Net Site Area
	M²	FT²	M²	FT²	M²	FT²	M²	FT²	M	M			Ac.
1	21553.5	232,000	371.6	4,000	1,393.5	15,000	23,318.65	251,000	15	18.5	30	2	11.45
2	78224.3	842,000	743.2	8,000	1,486.4	16,000	80,454.00	866,000	21	24.5	120	8	37.02
3	26802.5	288,500	371.6	4,000	1,393.5	15,000	28,567.67	307,500	21	24.5	26	2	13.26
4	90889.3	978,325	743.2	8,000	1,393.5	15,000	93,026.10	1,001,325	21-40	24.5-43.5	146	8	46.63
5	31354.8	337,500	372	4,000	1,393.5	15,000	33,119.92	356,500	15	18.5	30	2	12.55
6	19017.2	204,700	372	4,000	1,114.8	12,000	20,503.69	220,700	15	18.5	20	2	9.08
7	8175.5	88,000	-	-	743.2	8,000	8918.7	96,000	12.5	16.0	8	2	5.26
Total	276,017.1	2,971,025.0	2,973.7	32,000.0	8,918.7	96,000.0	287,908.7	3,099,025.0			380.0	26.0	135.25



Rev. Date By Description

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Langtree

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Six 56 Warrington
Illustrative Masterplan

CDE Reference

Drawn: nmj
Team: MMS
Scale: 1:2500 @ A1

Date: 09/2016

Project No: 16-184-F013

Dwg No: 001

Drawing Status: Preliminary

CAD Reference: 16-184-F013-001

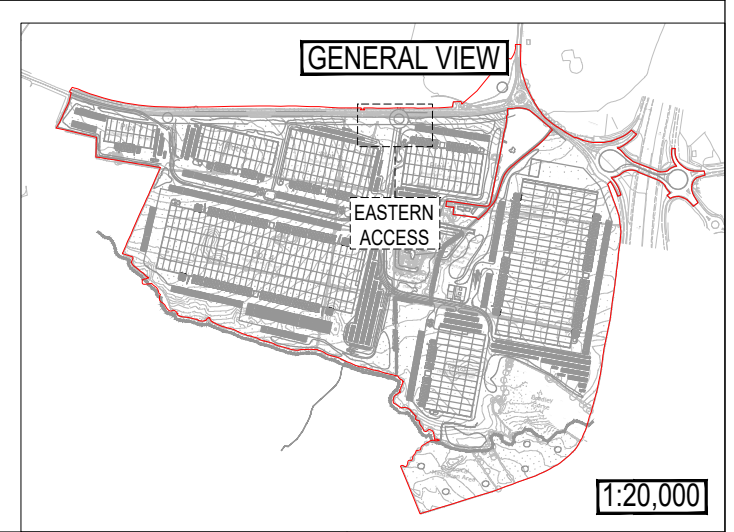
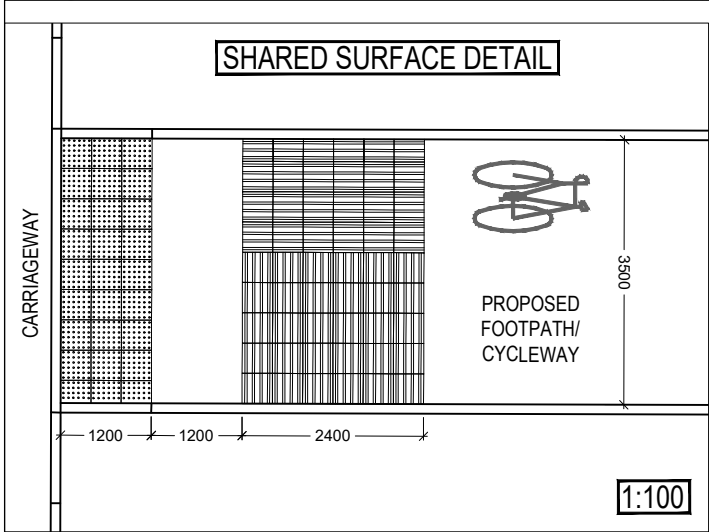
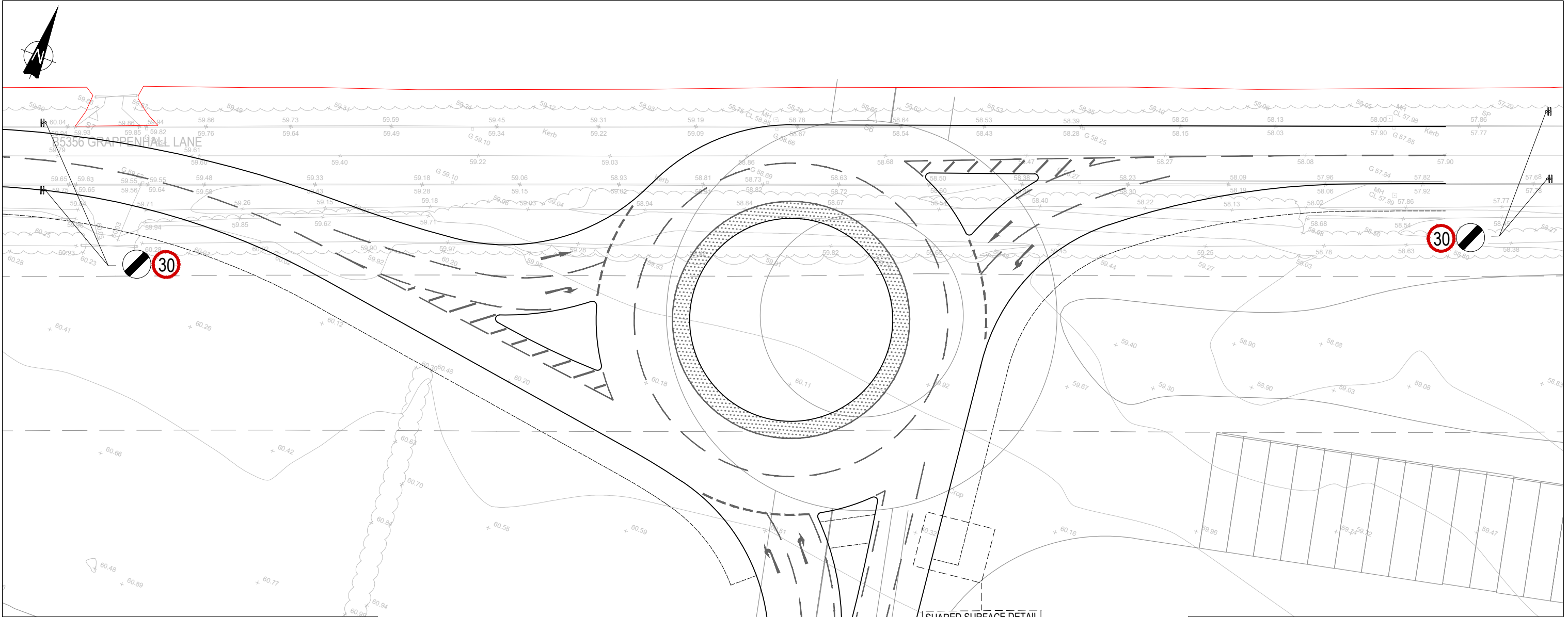
Date: 09/2016






Rev: Z

83081 Land to the west of Junction 20 of the M6
Motorway and Junction 9 of the M56 Motorway and to the
south of Grappenhall Lane and Cliff Lane, Grappenhall,
Warrington – known as Six:56



Appendix AV004 – Grappenhall Lane Access Plans (64076-CUR-00-XX-DR-TP-75001-P03 and 64076-CUR-00-XX-DR-TP-75002-P02) and Swept Path Analysis (64076-CUR-00-XX-DR-TP-05001-P03)



KEY:		INDICATIVE SITE BOUNDARY
		PROPOSED KERB LINE
		PROPOSED FOOTWAY/CYCLEWAY
		PROPOSED ROAD MARKINGS
		PROPOSED OVERRUNNING AREA
GENERAL NOTES:		

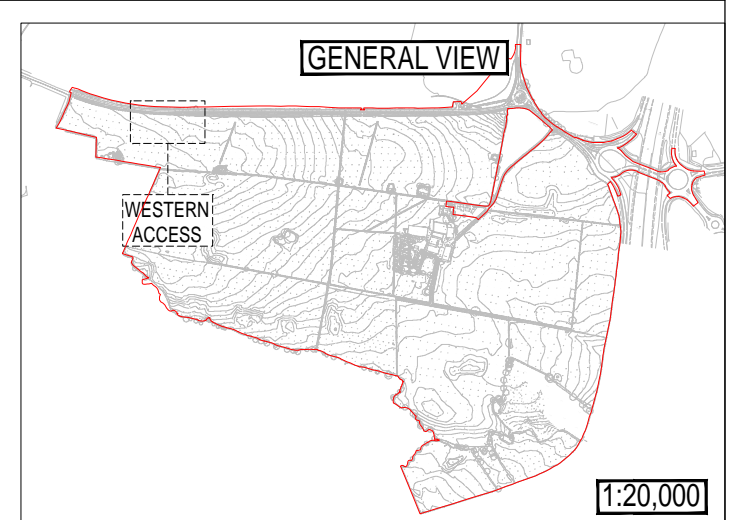
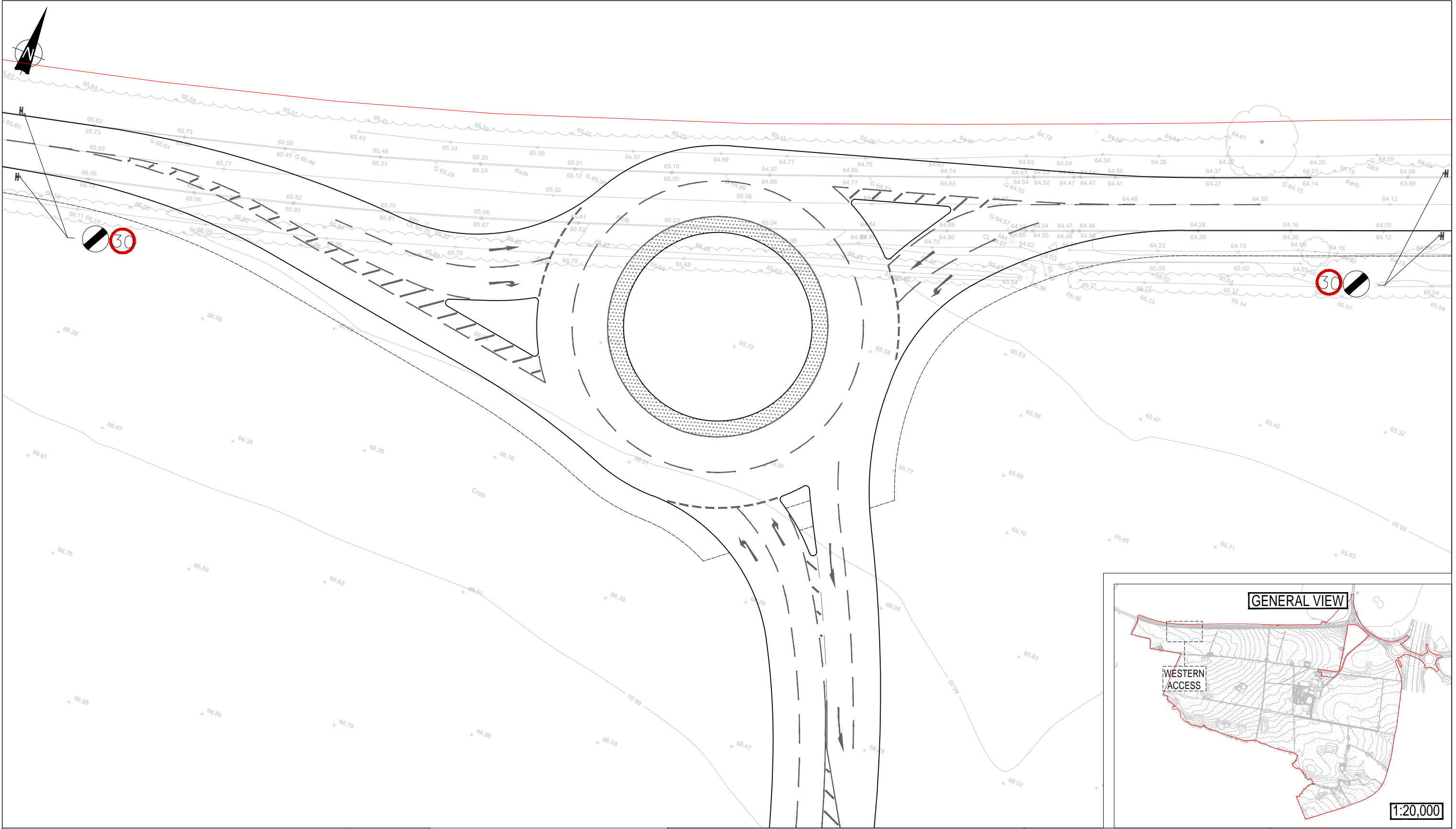
P03	Location updated	04/11/19	DD
P02	Roundabout updated	08/01/19	DD
Rev:	Description:	Date:	By:








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Project: WARRINGTON INTERCHANGE		Status: PRELIMINARY	
Drg Title: POTENTIAL EASTERN ACCESS ROUNDABOUT		Drawn By: DD	Checked By: LK
		Designed By: DD	Date: 06/07/18
		Scale: AS INDICATED	
Project No:	Originator:	Zone:	Level:
Type:	Discipline:	Category / Number:	Rev:
64076 - CUR - 00 - XX - DR - TP - 75001 -P03			



KEY:		INDICATIVE SITE BOUNDARY
		PROPOSED KERB LINE
		PROPOSED FOOTWAY/CYCLEWAY
		PROPOSED ROAD MARKINGS
		PROPOSED OVERRUNNING AREA
GENERAL NOTES:		

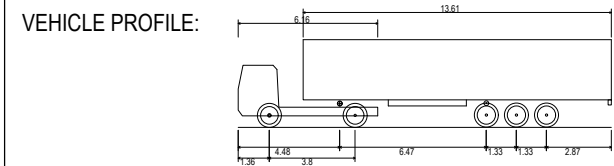
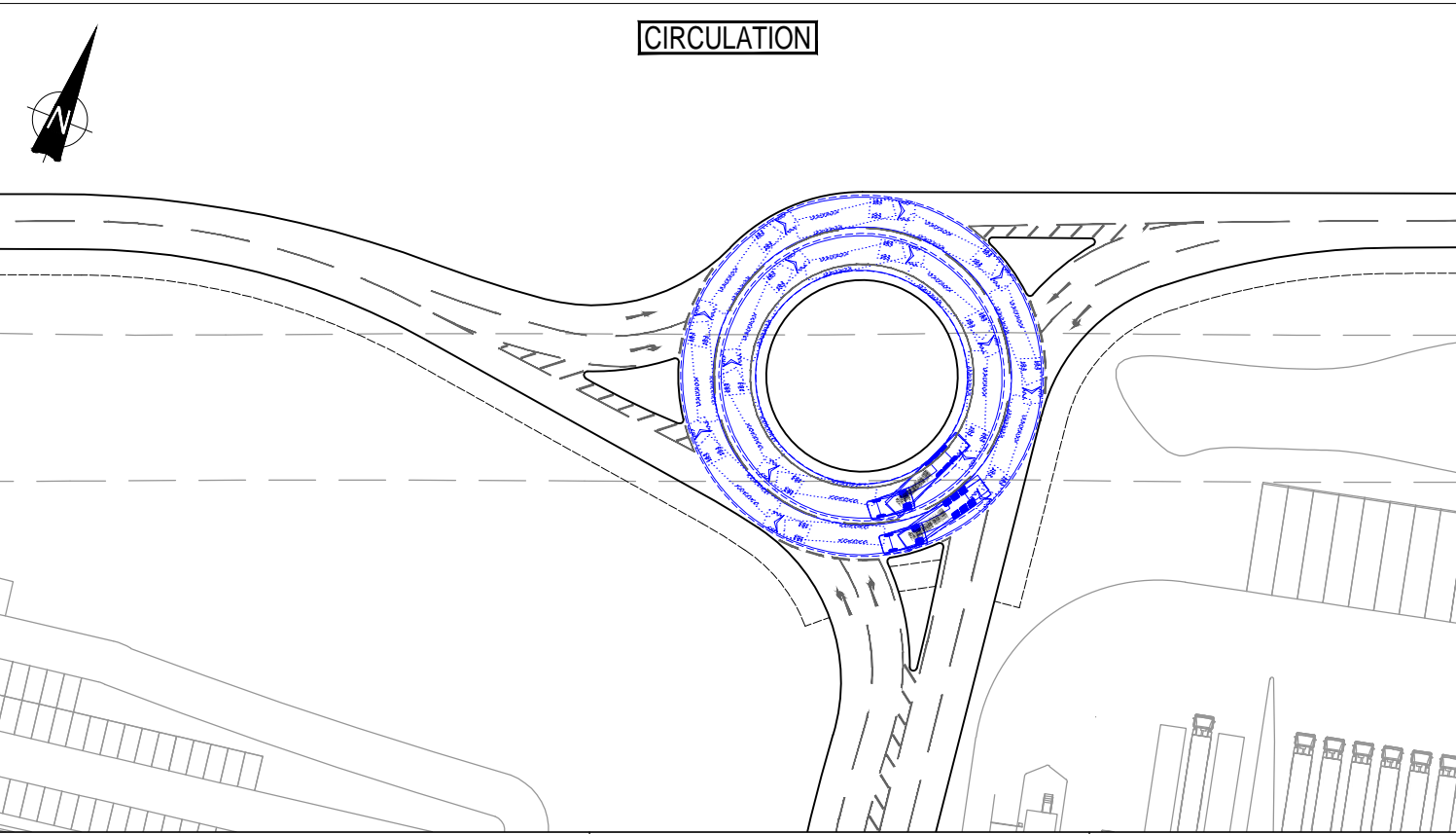
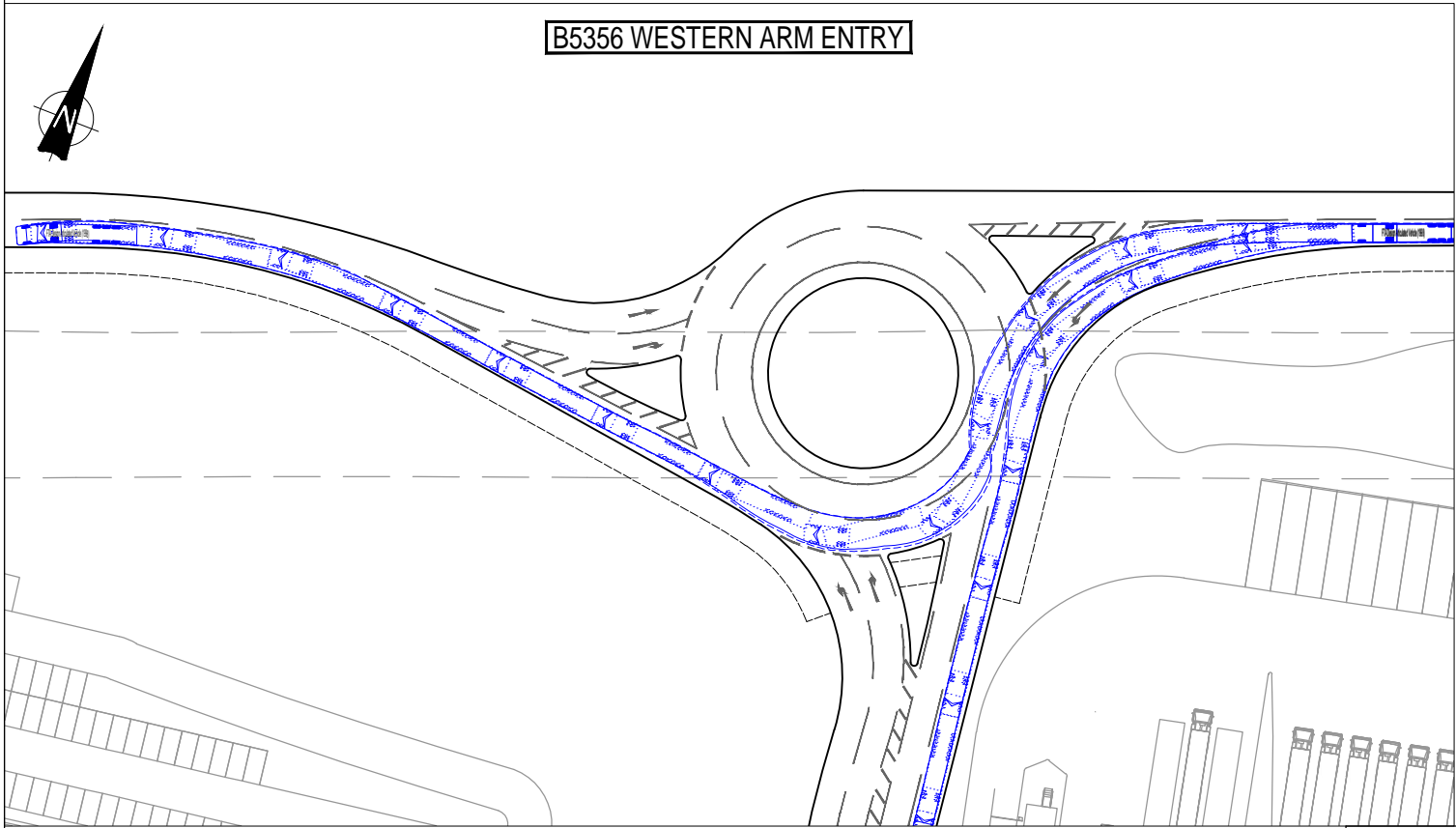
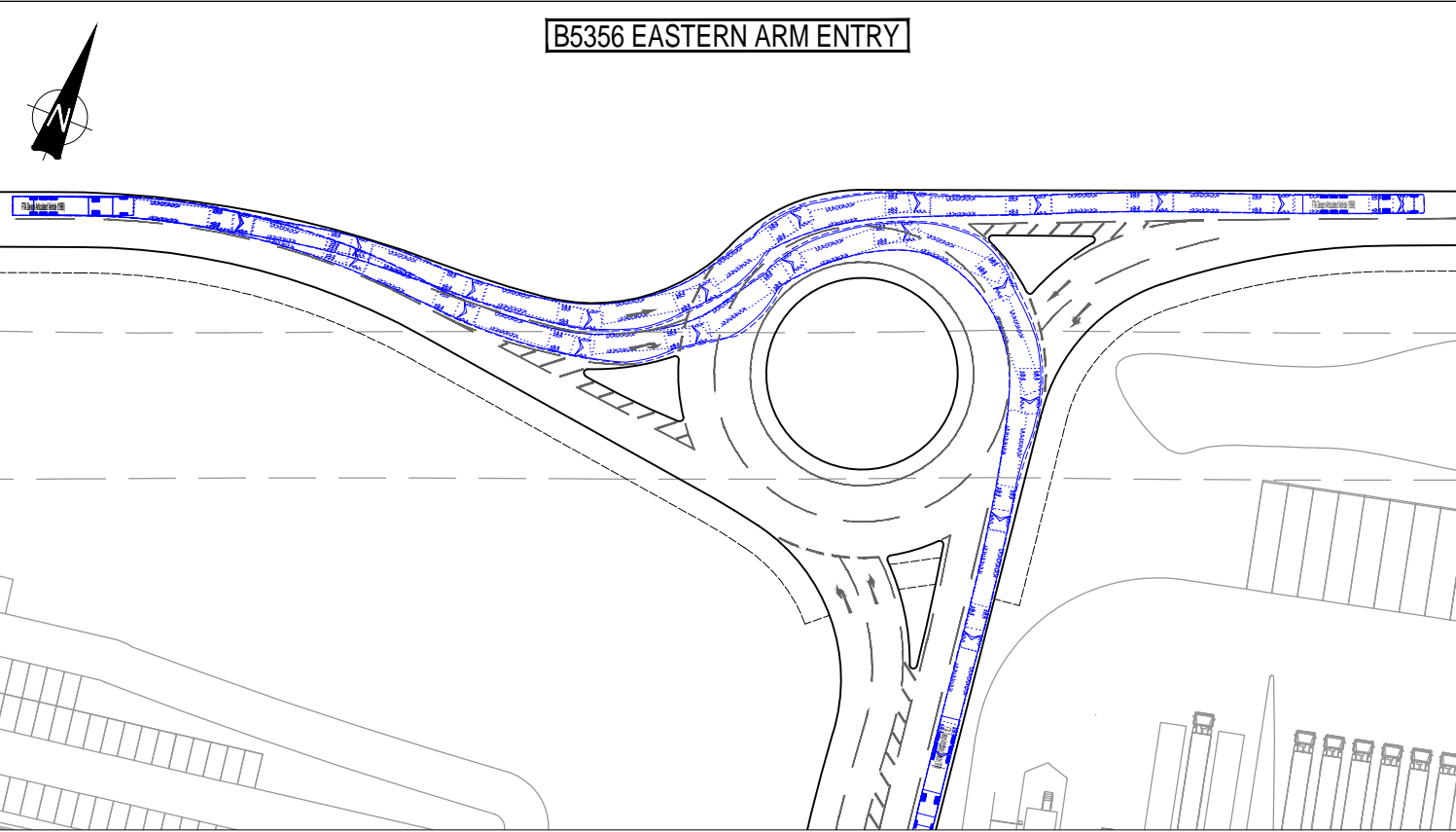
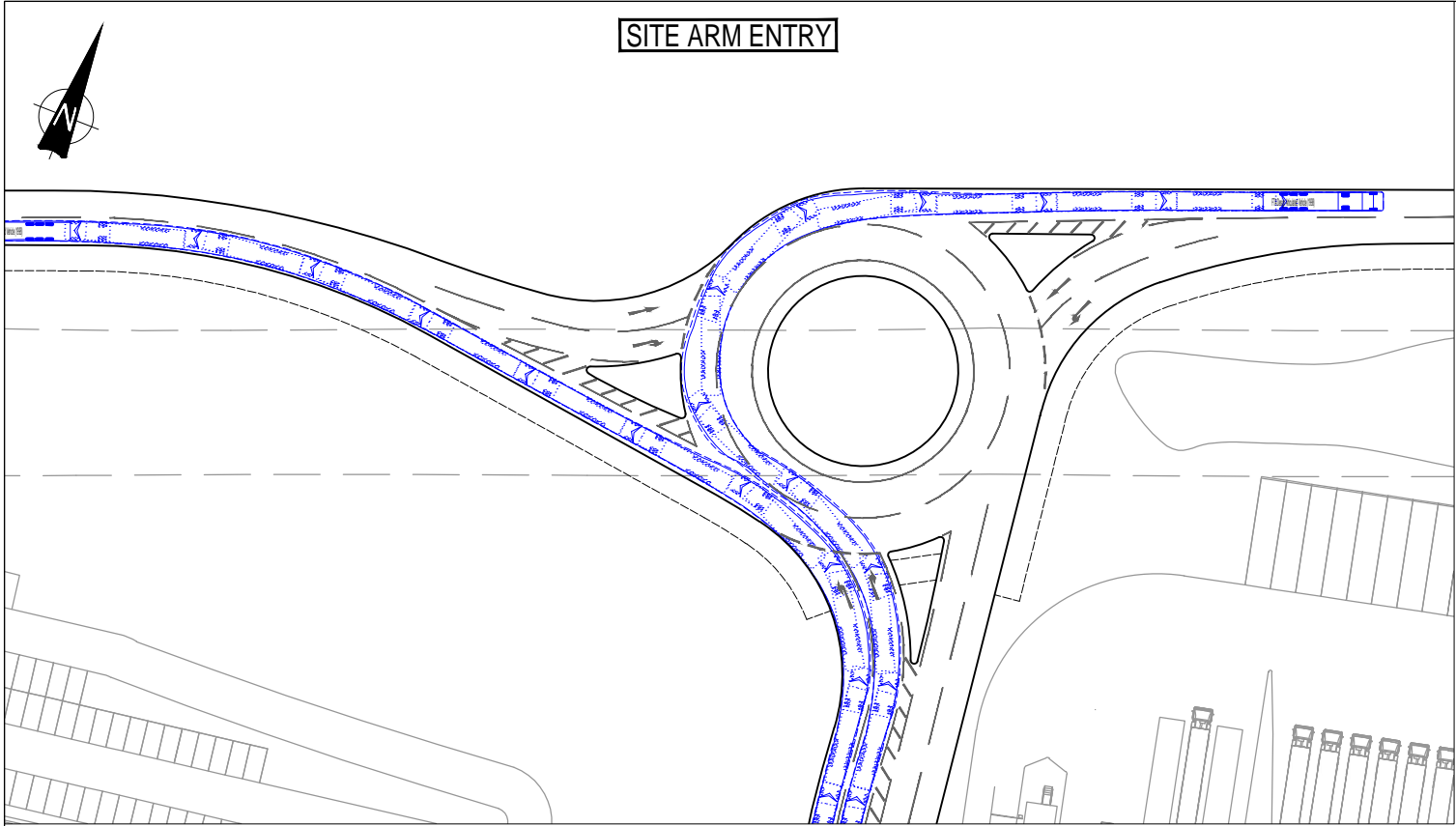
P02	Roundabout updated	08/01/19	DD
Rev:	Description:	Date:	By:



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Project: WARRINGTON INTERCHANGE		Status: PRELIMINARY	
Drg Title: POTENTIAL WESTERN ACCESS ROUNDAABOUT		Drawn By: DD	Checked By: LK
		Designed By: DD	Date: 06/07/18
		Scale: AS INDICATED	
Project No:	Originator:	Zone:	Level:
	Type:	Discipline:	Category / Number:
64076 - CUR - 00 - XX - DR - TP -		75002 -P02	



FTA Design Articulated Vehicle (1998)			
Overall Length	16.480m		
Overall Width	2.550m		
Overall Body Height	3.870m		
Min Body Ground Clearance	0.515m		
Max Track Width	2.470m		
Lock to lock time	3.00s		
Kerb to Kerb Turning Radius	6.550m		
P03	Layout updated	26/02/20	LL
P02	Layout updated	12/09/19	DD
Rev:	Description:	Date:	By:



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Project:	WARRINGTON SIX 56				Status:	PRELIMINARY	
Drg Title:	ROUNDAABOUT ACCESS SWEPT PATH ANALYSIS 16.5m ARTICULATED HGV				Drawn By:	DD	Checked By: LK
Project No:	Originator:	Zone:	Level:	Type:	Discipline:	Category / Number:	Rev:
64076	- CUR	- 00	- XX	- DR	- TP	- 05001	-P03
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				Designed By: DD			
				Date: 01/09/17			

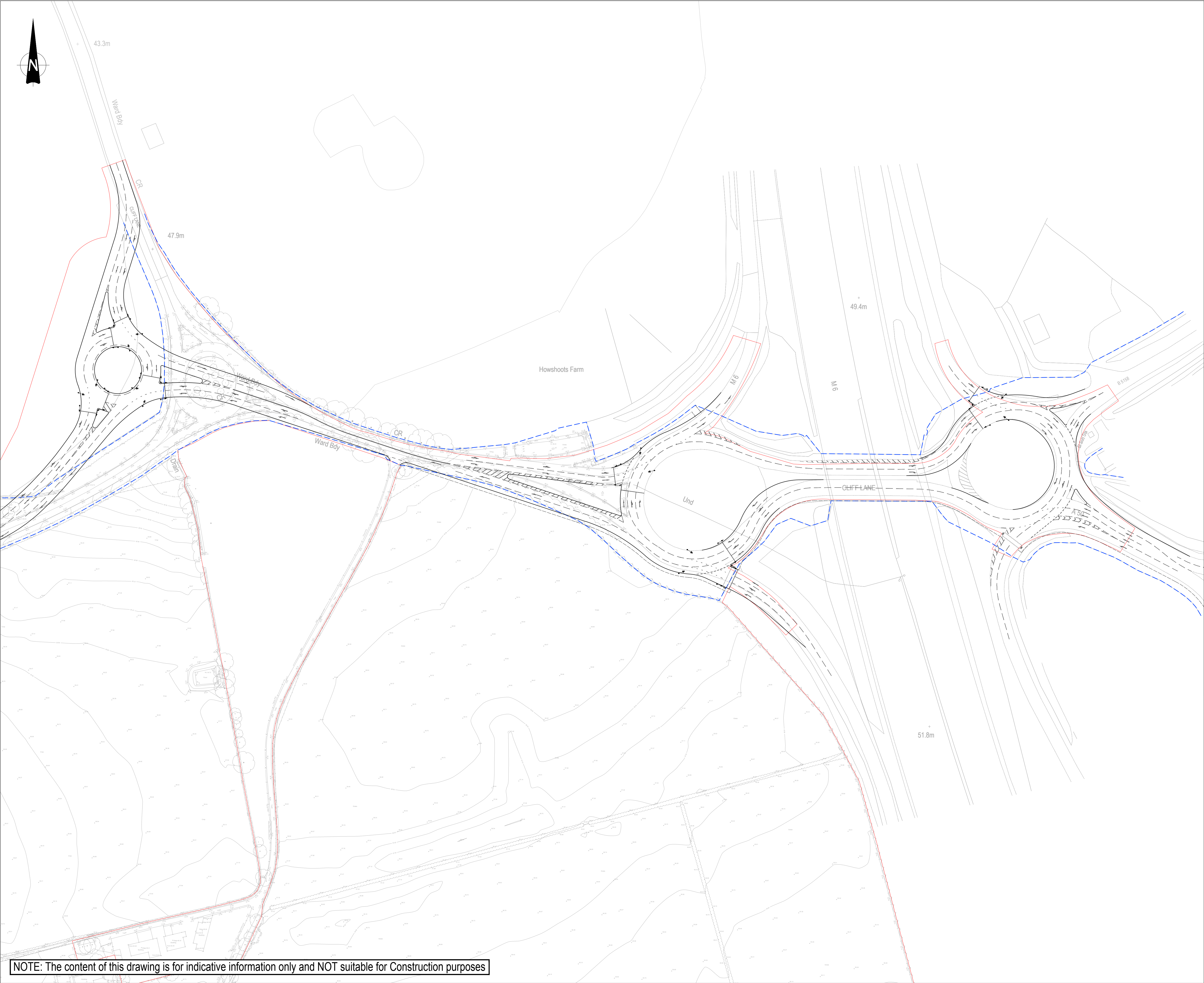
GENERAL NOTES:

\\mats01\Projects\064001 - 065000\064076 - Warrington Interchange TPMAIE - Drawings\CAD2-Working\2.2-DWG\06

83081 Land to the west of Junction 20 of the M6
Motorway and Junction 9 of the M56 Motorway and to the
south of Grappenhall Lane and Cliff Lane, Grappenhall,
Warrington – known as Six:56



Appendix AV005 – A50/M6 Junction 20 Mitigation Plan (64076-CUR-00-XX-DR-TP-75011-P06) and swept path analysis (64076-CUR-00-XX-DR-TP-05002-P02, 64076-CUR-00-XX-DR-TP-05003-P02, 64076-CUR-00-XX-DR-TP-05004-P02)



GENERAL NOTES:

- KEY:
- INDICATIVE LAND OWNERSHIP BOUNDARY
 - INDICATIVE EXTENTS OF PUBLIC HIGHWAY
 - PROPOSED KERB LINE
 - PROPOSED FOOTWAY
 - PROPOSED ROAD MARKINGS
 - PROPOSED TRAFFIC SIGNAL

P06	Road markings updated	08/11/19	JM	AV
P05	Road markings updated	06/11/19	DD	AV
P04	Road markings updated	29/07/19	DD	AV
P03	Footways updated	08/01/19	DD	AV
P02	Cliff Lane Roundabout. Northern arm entry updated	28/11/18	DD	AV
Rev:	Description:	Date:	By:	Chkd:



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Status:	PRELIMINARY			
Project:	WARRINGTON SIX 56			
Orig Title:	POTENTIAL IMPROVEMENTS			
Size:	Date:	Drawn By:	Designed By:	Checked By:
A1	15/11/18	DD	DD	AV
Scale:	1:1,000			
Project No:	Originator:	Volume:	Level:	Type:
64076	- CUR - 00	- XX	- DR	- TP -
75011	- P06			

NOTE: The content of this drawing is for indicative information only and NOT suitable for Construction purposes

\\msd2\Projects\64076 - 06000064076 - Warrington Interchange (P)MAE - Drawings\2.0\W075

CLIFF LANE ROUNDABOUT ARRANGEMENT

GENERAL VIEW

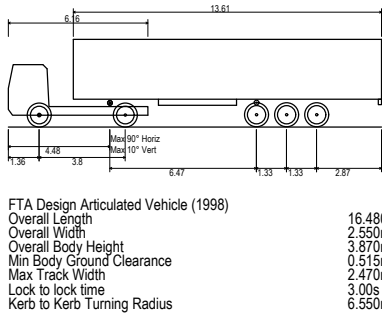
CLIFF LANE
ROUNDAABOUT
ARRANGEMENT

1:5,000

GENERAL NOTES:

KEY: — PROPOSED KERB LINE
- - - PROPOSED FOOTWAY
- - - - - PROPOSED ROAD MARKINGS

VEHICLE PROFILE:



47.9m

Ward Bdy

CR

Drain

P02	Layout updated	12/09/19	DD	FF
Rev:	Description:	Date:	By:	Chkd:



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Status: PRELIMINARY

Project: WARRINGTON INTERCHANGE

Orig Title: CLIFF LANE ROUNDABOUT
PROPOSED IMPROVEMENTS
SWEEP PATH ANALYSIS
16.5m ARTICULATED HGV

Size:	Date:	Drawn By:	Designed By:	Checked By:			
A1	22/10/18	DD	DD	AV			
Scale: AS STATED							
Project No:	Originator:	Volume:	Level:	Type:	Role:	Category / Number:	Rev:

64076 - CUR - 00 - XX - DR - TP - 05002 - P02

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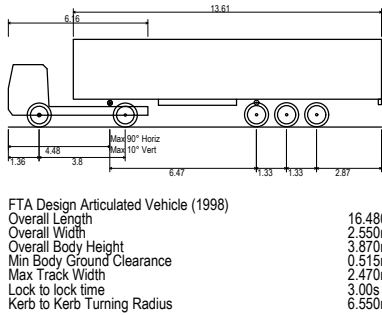
M6 J20 WESTERN ROUNDABOUT ARRANGEMENT

GENERAL VIEW

GENERAL NOTES:

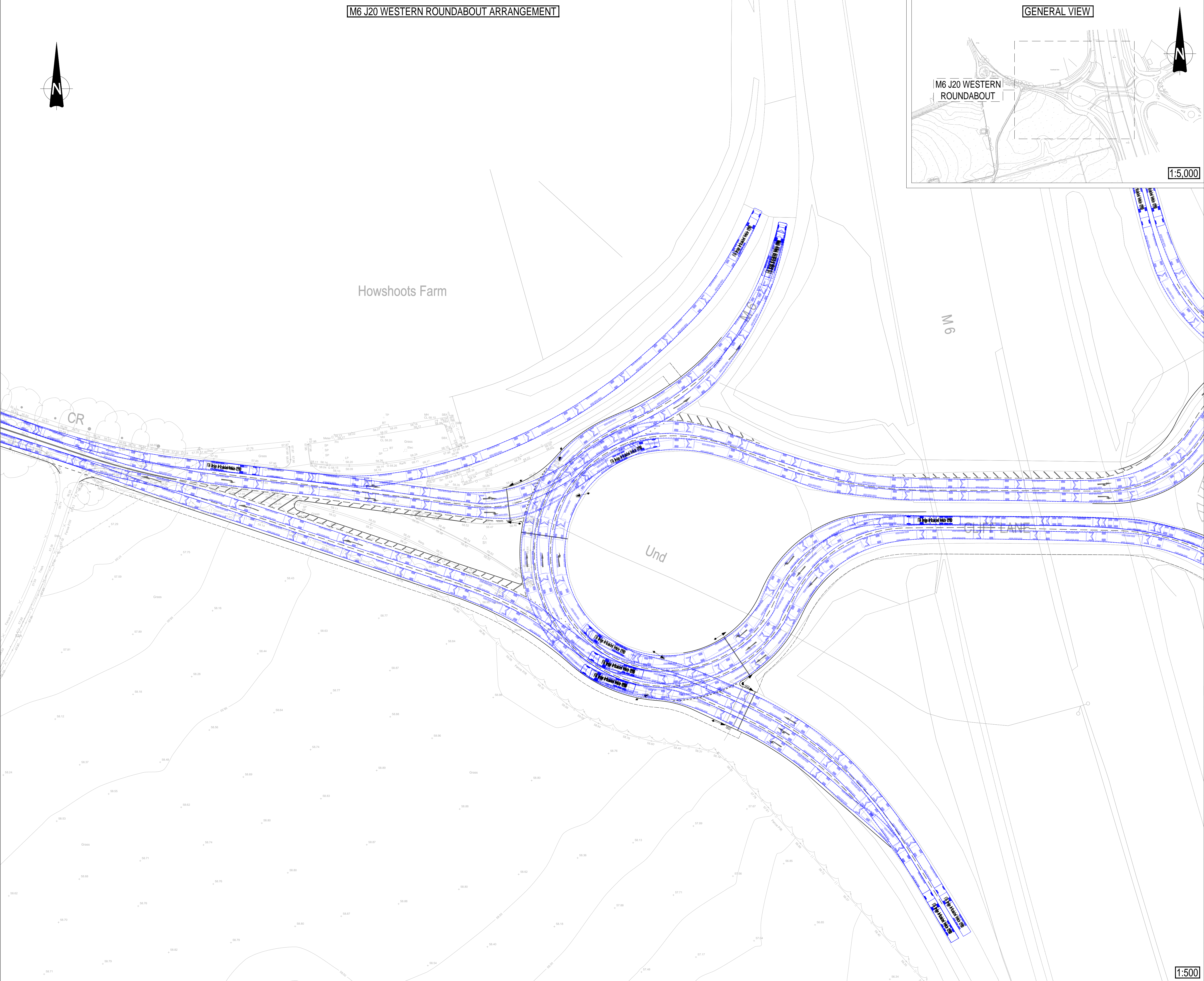
KEY: — PROPOSED KERB LINE
- - - PROPOSED FOOTWAY
- - - - - PROPOSED ROAD MARKINGS

VEHICLE PROFILE:



1:5,000

1:500



P02	Layout updated	12/09/19	DD	FF
Rev:	Description:	Date:	By:	Chkd:



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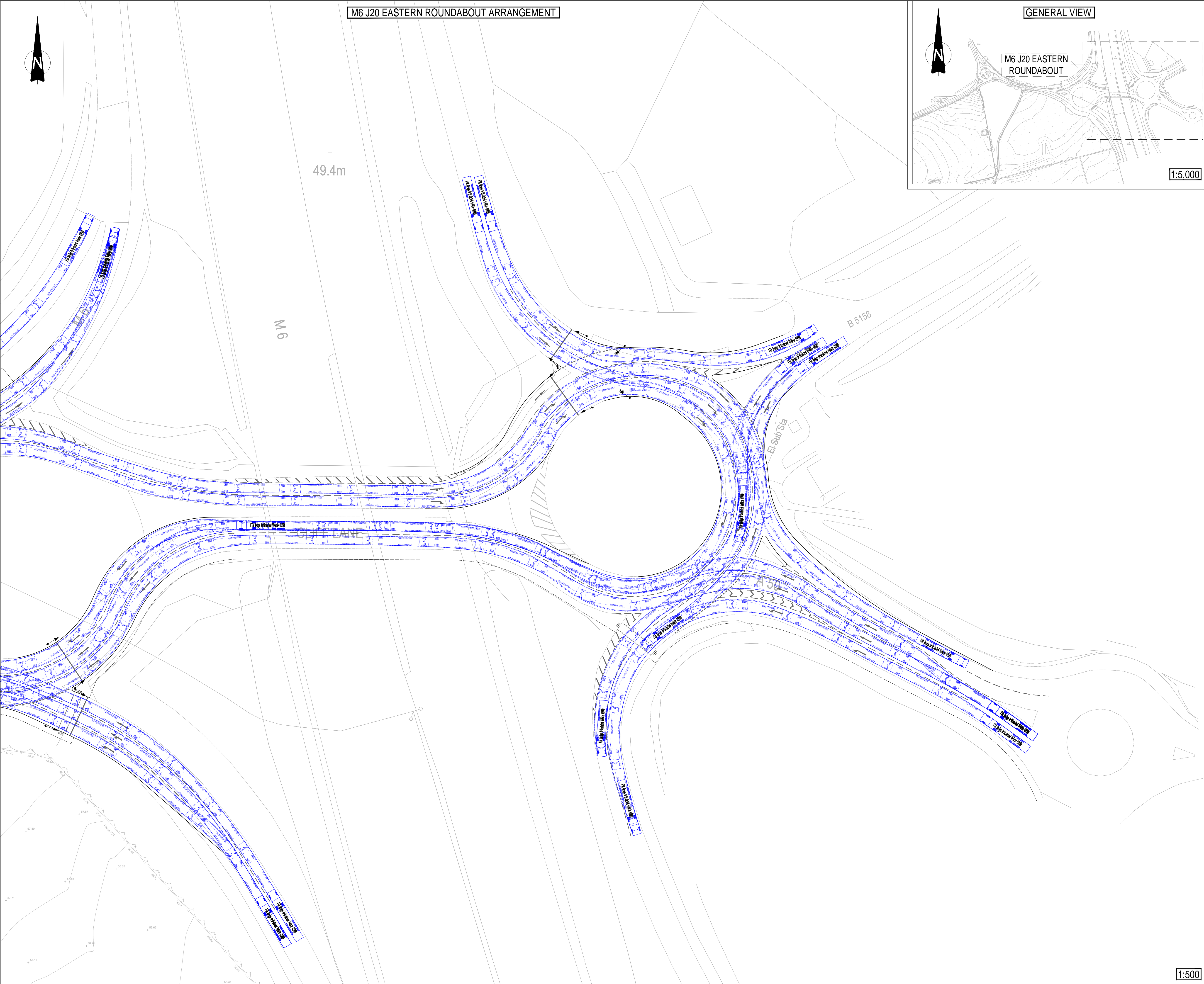
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Project: WARRINGTON INTERCHANGE

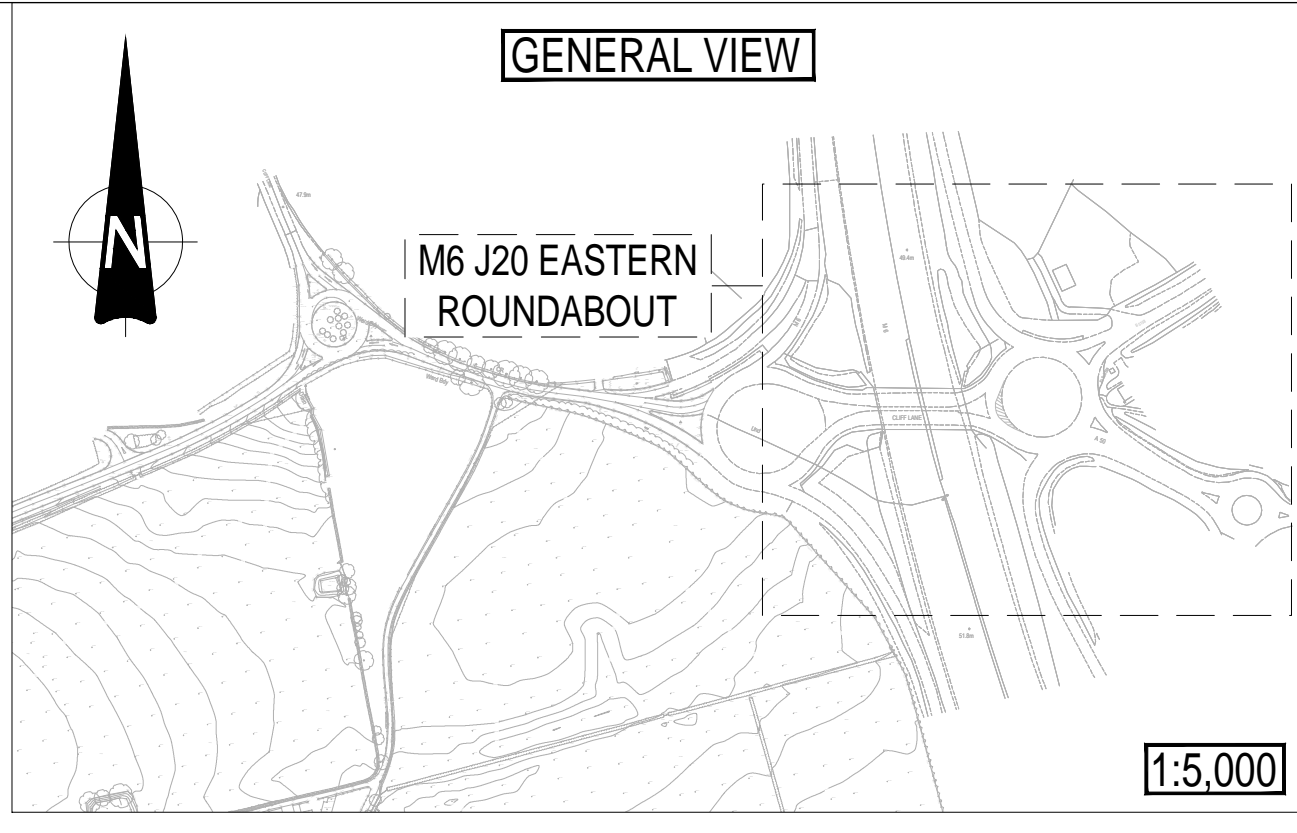
Orig Title: M6 J20 - WESTERN ROUNDABOUT
POTENTIAL IMPROVEMENTS
SWEPT PATH ANALYSIS
16.5m ARTICULATED HGV

Size:	Date:	Drawn By:	Designed By:	Checked By:			
A1	23/10/18	DD	DD	AV			
Scale: AS STATED							
Project No:	Originator:	Volume:	Level:	Type:	Role:	Category / Number:	Rev:

64076 - CUR - 00 - XX - DR - TP - 05003 - P02



M6 J20 EASTERN ROUNDABOUT ARRANGEMENT



GENERAL VIEW

GENERAL NOTES:

KEY: ——— PROPOSED KERB LINE
----- PROPOSED FOOTWAY
----- PROPOSED ROAD MARKINGS

VEHICLE PROFILE:

FTA Design Articulated Vehicle (1998)

Overall Length	18.450m
Overall Width	2.950m
Overall Height	3.870m
Min Body Ground Clearance	0.110m
Max Tyre Width	2.420m
Lock to Lock Time	3.00s
Wheel to Wheel Turning Radius	6.500m

P02	Layout updated	12/09/19	DD	FF
Rev:	Description:	Date:	By:	Chkd:

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Status: PRELIMINARY

Project: WARRINGTON INTERCHANGE

Orig Title: M6 J20 - EASTERN ROUNDABOUT
POTENTIAL IMPROVEMENTS
SWEEP PATH ANALYSIS
16.5m ARTICULATED HGV

Size:	Date:	Drawn By:	Designed By:	Checked By:			
A1	23/10/18	DD	DD	AV			
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Project No:	Originator:	Volume:	Level:	Type:	Role:	Category / Number:	Rev:

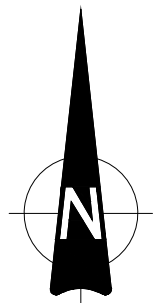
64076 - CUR - 00 - XX - DR - TP - 05004 - P02

1:500

83081 Land to the west of Junction 20 of the M6
Motorway and Junction 9 of the M56 Motorway and to the
south of Grappenhall Lane and Cliff Lane, Grappenhall,
Warrington – known as Six:56



Appendix AV006 – Pedestrian and Cycle Improvements (64076-CUR-00-XX-
DR-TP-75014-P02)



GENERAL NOTES:

- KEY:
- INDICATIVE RED LINE
 - PROPOSED KERB LINE
 - PROPOSED 3.5m CYCLE WAY / FOOTWAY
 - PROPOSED ROAD MARKINGS

PEDESTRIAN AND CYCLE
INFRASTRUCTURE TO BE TIED
INTO EXISTING NETWORK AS
PART OF S.278 DETAILED DESIGN

PROPOSED 3.5m CYCLEWAY / FOOTWAY

PEDESTRIAN AND CYCLE
INFRASTRUCTURE TO BE TIED
INTO EXISTING NETWORK AS
PART OF S.278 DETAILED DESIGN

P02	Location of eastern roundabout updated	03/02/20	LL	AV
Rev:	Description:	Date:	By:	Chkd:



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Status: PRELIMINARY

Project: WARRINGTON SIX 56

Orig Title: PEDESTRIAN AND CYCLE IMPROVEMENTS

Size:	Date:	Drawn By:	Designed By:	Checked By:			
A1	08/01/19	DD	DD	AV			
Scale:	1:1,500						
Project No:	Originator:	Volume:	Level:	Type:	Role:	Category / Number:	Rev:
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83081 Land to the west of Junction 20 of the M6
Motorway and Junction 9 of the M56 Motorway and to the
south of Grappenhall Lane and Cliff Lane, Grappenhall,
Warrington – known as Six:56



Appendix AV007 – Planning Background and Chronology

1.0 Planning History and Chronology

Pre-Application Discussions

- 1.1.1 Curtins was first made aware of the Six 56 project in September 2016 and were appointed shortly after. Curtins identified early on that there would be traffic and transport impacts on the local highway network in Warrington and the Strategic Road Network managed by National Highways (NH) (then Highways England).
- 1.1.2 Initial scoping discussions with Warrington Borough Council (WBC), National Highways and their advisors (WSP and later Atkins) took place throughout 2017. This included a series of initial meetings which touched on some possible assessment parameters and assessment methodology, but were more of an introduction to the project.
- 1.1.3 In early 2018, an Environmental Impact Scoping Report dated 23 February was submitted to WBC. A response was received on the 6th April 2018 and whilst this included some information on highway matters more detailed scoping discussions were still required.
- 1.1.4 On the 13th June 2018 a detailed traffic and transport scoping study was submitted to WBC Highways, NH and their advisors WSP and Atkins. This included details on key modelling parameters, initial modelling results, access drawings and a consideration of accessibility.
- 1.1.5 Meetings and discussions continued after the submission of the scoping note and feedback was received from all parties that enabled Curtins to refine the access strategy, the mitigation proposals, the modelling strategy and key parameters such as trip rates and committed development assumptions. Full details of the engagement that took place and the matters that were agreed are included in the ES.
- 1.1.6 In early 2019, the Transport Assessment, Travel Plan and Environmental Statement were finalised and submitted to WBC. These documents were prepared in broad accordance with the scope that had been agreed through the above discussions.

Post Submission

- 1.1.7 Following submission of the application, initial consultation responses were received from WBC Highways and NH. The NH response (CD 4.64) was dated 12th August 2019 and the WBC response (CD 4.65) was dated the 15th August 2019.
- 1.1.8 The comments from WBC largely related to the site access, accessibility, traffic forecasting, modelling and mitigation. The comments from NH covered a wide range of issues including the ES, mitigation and modelling.

1.1.9 Curtins responded to the WBC comments in Post Submission Note 1 (CD 4.66) on the 12th September 2019.

1.1.10 Curtins responded to the NH points in the form of a Post Submission Note (CD 4.67) also dated the 12th September 2019. This prompted additional comments from NH dated 16th October 2019 (CD 4.68) and the 20th December 2019 (CD 4.69). Additional post submission notes were prepared in November (CD 4.70) and January (CD 4.71) and following receipt of these NH confirmed in March 2020 (CD 4.72) that they no longer had any objections and recommended approval subject to conditions.

1.1.11 I have not reproduced these consultation responses or the post submission responses as matters have largely moved on since that time. Furthermore, all of the comments were captured in an updated Transport Assessment and Environmental Statement Addendum dated June 2020.

1.1.12 The ES Addendum provides reasoning for the addendum as follows:

‘Since the submission of the planning application, consultation responses have been received from key consultees and further discussions have taken place with the Council and their key consultees (namely WBC Highway Officers, Highways England (HE) and their consultants Atkins, WBC Environmental Protection Officers, Historic England and WBC Conservation Officer and Ramboll landscape designers acting on behalf of WBC).

Further clarification and information has been provided in line with requests by HE and WBC Highway’s Officer relating to the design of the mitigation and the WMMTM traffic model.

Consequently, the indicative masterplan and parameters plans have evolved to address comments raised by these key consultees. This addendum therefore includes additional and updated information to address the comments raised by key consultees.’

1.1.13 Following a review of the ES addendum, NH responded (CD 4.73) on the 15th February 2021, again offering no objection subject to conditions. WBC responded (CD 4.74) on the 19th May 2021 offering no objection subject to conditions.

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Appendix AV008 – Appeal Decisions on Severity

Appeal Decision on Severity

Appeal Decision No/Date	Name	Decision/Inspector	Inspector Comments
APP/X0360/W /19/3238048 9 th April 2020	Nine Mile Ride, Berkshire	Dismissed Ms Christina Downes	<p>Para 1.20 states that:</p> <p><i>There is no dispute that the local road network, including Nine Mile Ride, is busy especially during peak periods. The indications are that this will get worse once the Arborfield Garrison SDL is built out. Local residents were particularly concerned about traffic impacts and pedestrian safety.</i></p> <p>Para 1.21 states that:</p> <p><i>....The Appellant's Transport Assessment includes agreed trip rates and trip assignments. This shows 67 trips generated in the morning peak and 65 trips in the afternoon peak, which would be spread between the 2 access points. The evidence shows that the additional traffic that would be added from the appeal scheme would amount to less than one vehicle a minute and be insignificant when daily variations are taken into account.</i></p> <p>Para 1.23 concludes that:</p> <p><i>Paragraph 109 of the Framework indicates that development should only be prevented or delayed if there would be an unacceptable impact on highway grounds or the residual cumulative impacts on the road</i></p>

Appeal Decision on Severity

Appeal Decision No/Date	Name	Decision/Inspector	Inspector Comments
			<i>network would be severe. The Council as Highway Authority has raised no objection to the appeal scheme on this basis. This is a matter of importance because it is the statutory authority responsible for highway safety on the local road network. Bearing all of these points in mind, I am satisfied that there would not be an unacceptable highway impact or that the cumulative effects would be severe.</i>
APP/J1915/W/ 19/3234842 30 th January 2020	Land East of Marshgate Drive, Hertford	Allowed Mr Phillip J G Ware	<p>Para 96 states that:</p> <p><i>To conclude on capacity, neither party disputes that the Bluecoats roundabout and Ware Road/Mill Road are busy junctions at peak times and that there is some congestion.....</i></p> <p>Para 98 states that:</p> <p><i>The traffic associated with the proposed development would be 62 movements in the morning peak and 70 in the evening peak. The consequences of this would be to slightly increase queuing at the Ware Road/Mill Road junction, but this small effect can be mitigated. The residual impact is very small at around 1.3% in the peak hours. This is not a cumulative severe impact which the Framework requires to resist a development.</i></p>

Appeal Decision on Severity

Appeal Decision No/Date	Name	Decision/Inspector	Inspector Comments
APP/A0665/W /19/3220360 2 nd October 2019	Land at The Hollies, Northwich	Allowed Mr Andrew Dawe	<p>Paras 5-22 considers highway matters including peak hour spreading, daily variation, committed development and highway safety.</p> <p>Para 13 states that:</p> <p><i>I have also considered the identified very small projected increases in average journey time and distance travelled of each passenger car unit (PCU). Even taking account of the effects not being evenly distributed across the highway network, such increases would be likely to be imperceptible to drivers, amounting to a small number of seconds and metres respectively, not disputed by the parties. Like my colleague in respect of the previous outline appeal scheme for up to 350 dwellings referred to previously, I acknowledge that this is a matter of driver convenience, where relevant local and national policy concerns the impacts on the highway network.</i></p> <p>Para 23 concludes that:</p> <p><i>In this case, I consider that the proposal, for the above reasons, would not cause severe residual cumulative impacts on the road network. Therefore, the traffic generated by the proposed development would be adequately accommodated on the local highway</i></p>

Appeal Decision on Severity

Appeal Decision No/Date	Name	Decision/Inspector	Inspector Comments
			<i>network taking account of its capacity and levels of congestion. As such, in respect of this issue, the proposal would accord with policy STRAT 10 of the Local Plan Part One, policy TC1 of the HNP, and paragraph 109 of the Framework.</i>
APP/F2360/W /18/3202604 15 th February 2019	Land North of Brindle Road, Bamber Bridge	Allowed Mr Richard Clegg	Para 44 states that: <i>In addition, the traffic generated by the development would cause the practical capacities of three junctions to be exceeded at peak times, although the residual impacts on the local highway network would not be severe. These limited harms do not warrant a decision being taken other than in accordance with the Development Plan.</i>
APP/P3040/W /17/3185493 23 rd May 2018	Land North of Asher Lane Nottinghamshire	Allowed Mr Nick Fagan	Para 11 states that: <i>The Council also agreed that the meaning of the term 'severe impacts' in the last bullet point of paragraph 32 of the National Planning Policy Framework (NPPF) as set out in the recent Hartnell's Farm appeal decision, which cross referred to an earlier Secretary of State decision, was a fair approach. That approach was that the term 'severe' sets a high bar for intervention via the planning system in traffic effects arising from</i>

Appeal Decision on Severity

Appeal Decision No/Date	Name	Decision/Inspector	Inspector Comments
			<p><i>development; mere congestion and inconvenience are insufficient in themselves but rather it is a question of the consequence of such congestion.</i></p> <p><i>Para 40 states that</i></p> <p><i>The Council argued that the additional traffic from the development would have a disproportionate and exponential effect on the junction because it is already over capacity. By the appellant's figures this would produce an additional 168.5m of additional queuing traffic on the southern arm of the A60 in the AM peak. However, this arm of the junction would operate at well over capacity in the absence of the development by 2023. Furthermore that is without factoring in the potential traffic from the Council's preferred alternative housing allocation sites at RUD05 and RUD13, which together would generate substantial additional traffic at this junction. Yet in spite of this NCC does not have an improvement scheme for the junction and so is not seeking pro-rata contributions. This indicates to me that it does not really regard congestion at the junction in the future to be a serious cause for concern, even with the proposed development's traffic.</i></p> <p><i>Para 47 states that:</i></p>

Appeal Decision on Severity

Appeal Decision No/Date	Name	Decision/Inspector	Inspector Comments
			<i>....I conclude that the proposed development would not result in severe residual cumulative impacts on the local highway network....</i>

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Appendix AV009 – Accident Data Update

Highway Safety Update

Junction / Link	Slight	Serious	Fatal	Totals
Grappenhall Search Area				
A50 Knutsford Road	2	1	0	3
A50 Knutsford Road / A56 Stockport Road / A56 Chester Road	1	0	0	1
Appleton Thorn and Stretton Search Area				
B5356 Grappenhall Lane	2	1	0	3
B5356 Grappenhall Lane / Broad Lane	0	1	0	1
B5356 Grappenhall Lane / Arley Road / Lumb Brook Lane	2	0	0	2
B5356 Stretton Road	1	0	0	1
B5356 Stretton Road / Pepper Street	1	0	0	1
B5356 Stretton Road / Spark Hall Close	1	0	0	1
B5356 Stretton Road / A49 London Road	1	0	0	1
Site Frontage and Dumbbell Roundabout Search Area				
B5356 Grappenhall Lane / Cartridge Lane	3	0	0	3
A50 Cliff Lane	1	0	0	1
A50 Cliff Lane / Lymm Interchange (western roundabout)	0	1	0	1
Old Cherry Lane	1	0	0	1
B5158 Cherry Lane / Lymm Interchange (eastern roundabout)	2	0	0	2
Cliff Lane / Lymm Interchange (eastern roundabout)	1	0	0	1

Junction / Link	Slight	Serious	Fatal	Totals
Lymm Interchange (between both roundabouts)	2	0	0	2
M6 Offslip (N) on approach to Lymm Interchange (eastern roundabout)	1	0	0	1
M6 / M6 Onslip (N) from Lymm Interchange (western roundabout)	1	0	0	1
A50 Cliff Lane / Lymm Truck Wash Access	1	0	0	1
M6 Junction 20 Merge and Diverge Points Search Area				
M56 (W/E) / M6 (S) Onslip from Lymm Interchange (eastern roundabout)	2	0	0	2
M6 (N) / M56 (W) Onslip	0	1	0	1
M56 (W/E) Onslip from Lymm Interchange (eastern roundabout)	2	0	0	2
M6 (N) Offslip onto M56 (W/E)	1	0	0	1
M56 (W) Offslip onto M6 (N)	1	0	0	1
M56 (W) Offslip onto Lymm Interchange (western roundabout)	2	0	0	2
M6 (S) / M6 (S) Onslip from Lymm Interchange (eastern roundabout)	1	0	0	1
M56 (E) Offslip onto M6 (N)	2	0	0	2
Total	35	5	0	40

Table 1.1 – Personal Injury Accident Data Summary (July 2018 to December 2021)

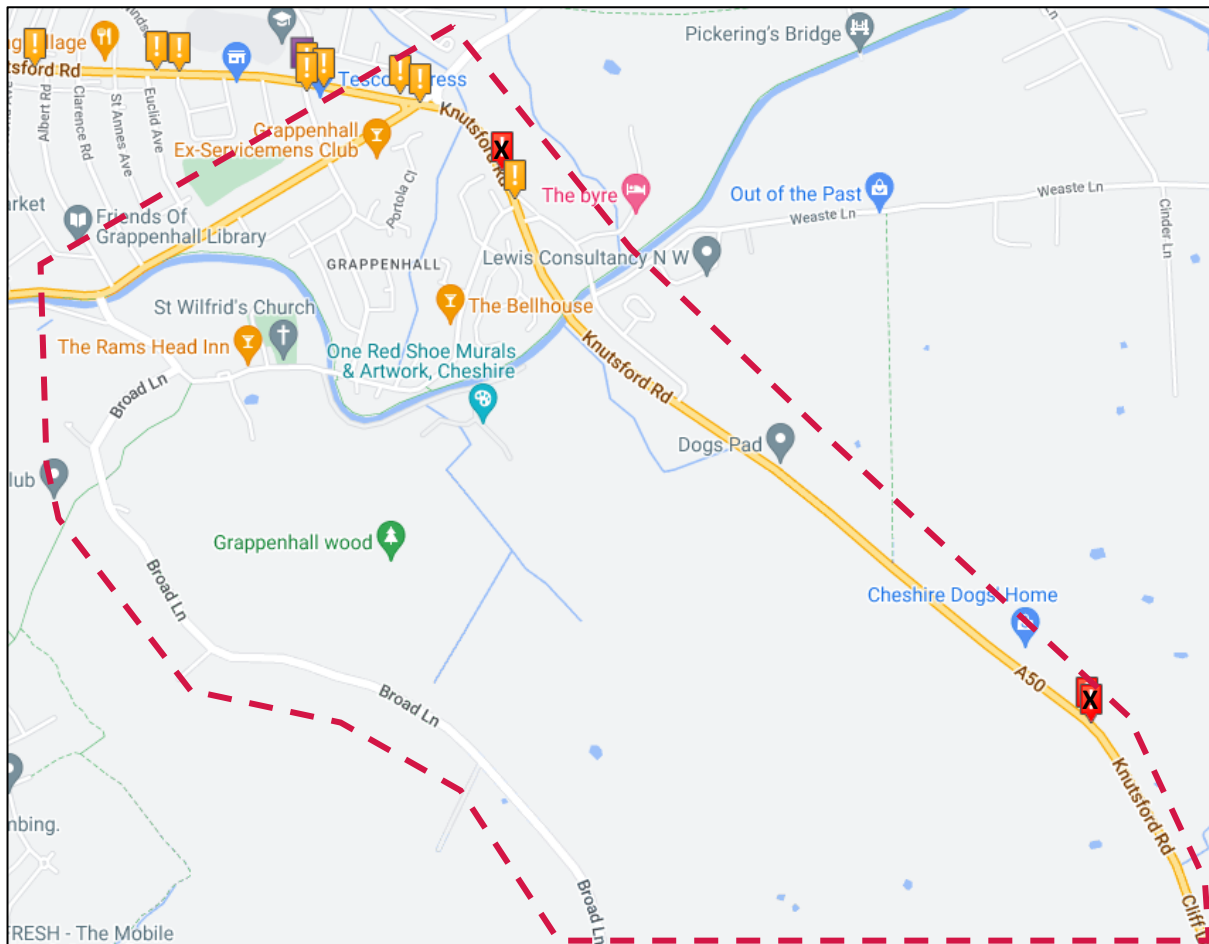
1.1.1 A review of Table 1.1 shows that a total of 40 accidents, categorised as 35 ‘slight’ severity accidents and 5 ‘serious’ severity accidents were reported across the entire study area

between July 2018 to December 2021. No fatal accidents were recorded within the study area and study period.

- 1.1.2 The frequency of accidents reported at the motorway junctions is considered to be fairly low (8 accidents along the M6 J20 dumbbell roundabouts and to the north of the dumbbell roundabouts (7 'slight' severity and 1 'serious' severity), and 11 accidents at the M6 / M56 interchange to the south of the M6 J20 dumbbell roundabouts (10 'slight' severity and 1 'serious' severity)).
- 1.1.3 A review of the accident locations indicate that the accidents are generally disbursed across the study area with no significant clusters.

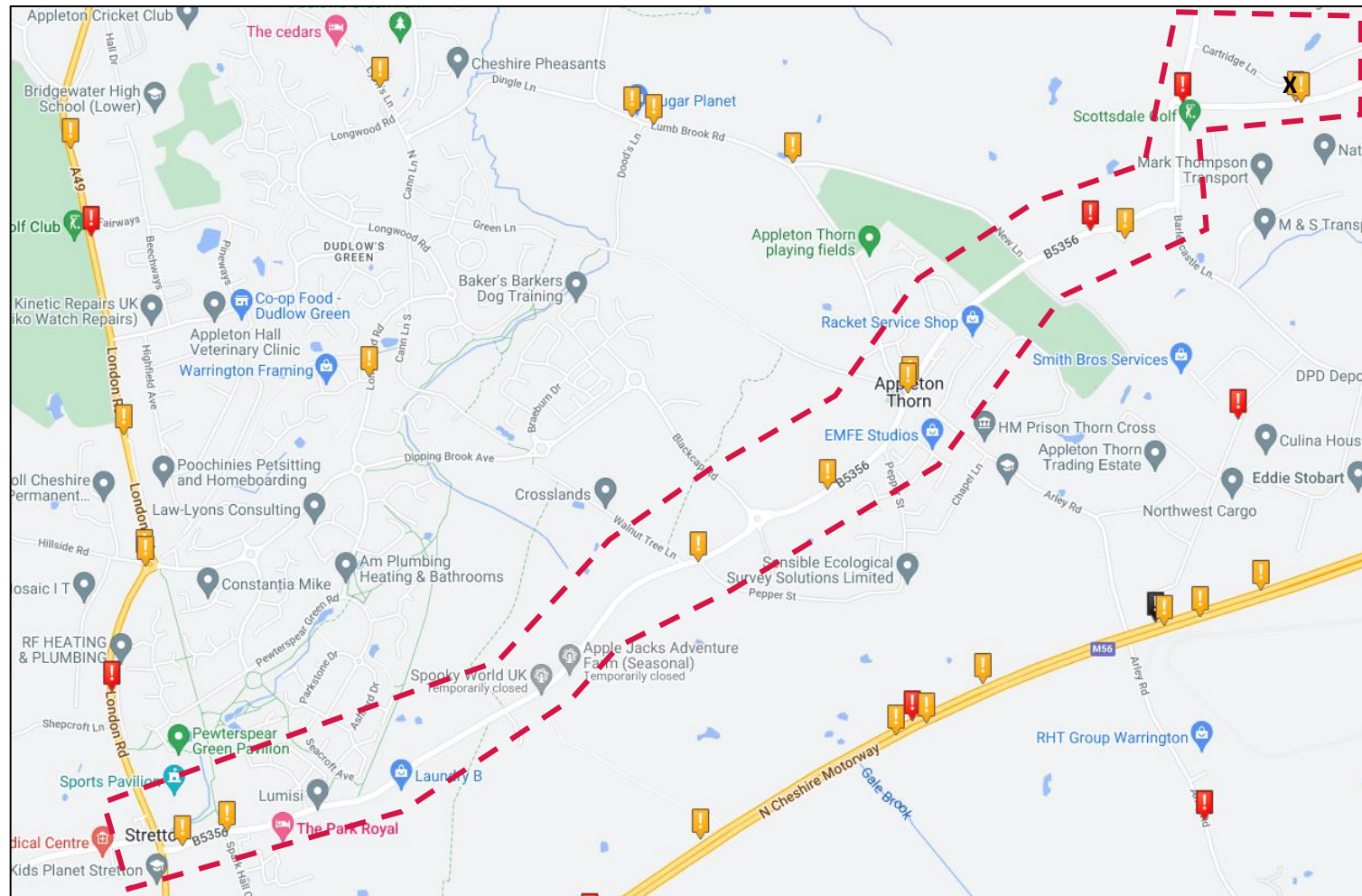
Grappenhall Search Area:

(Accidents within the study area that are marked “X” denote accidents occurring outside the study period of July 2018 – December 2021, as Crashmap releases data filtered by a yearly basis (i.e. all of 2018 – 2021))



Appleton Thorn and Stretton Search Area:

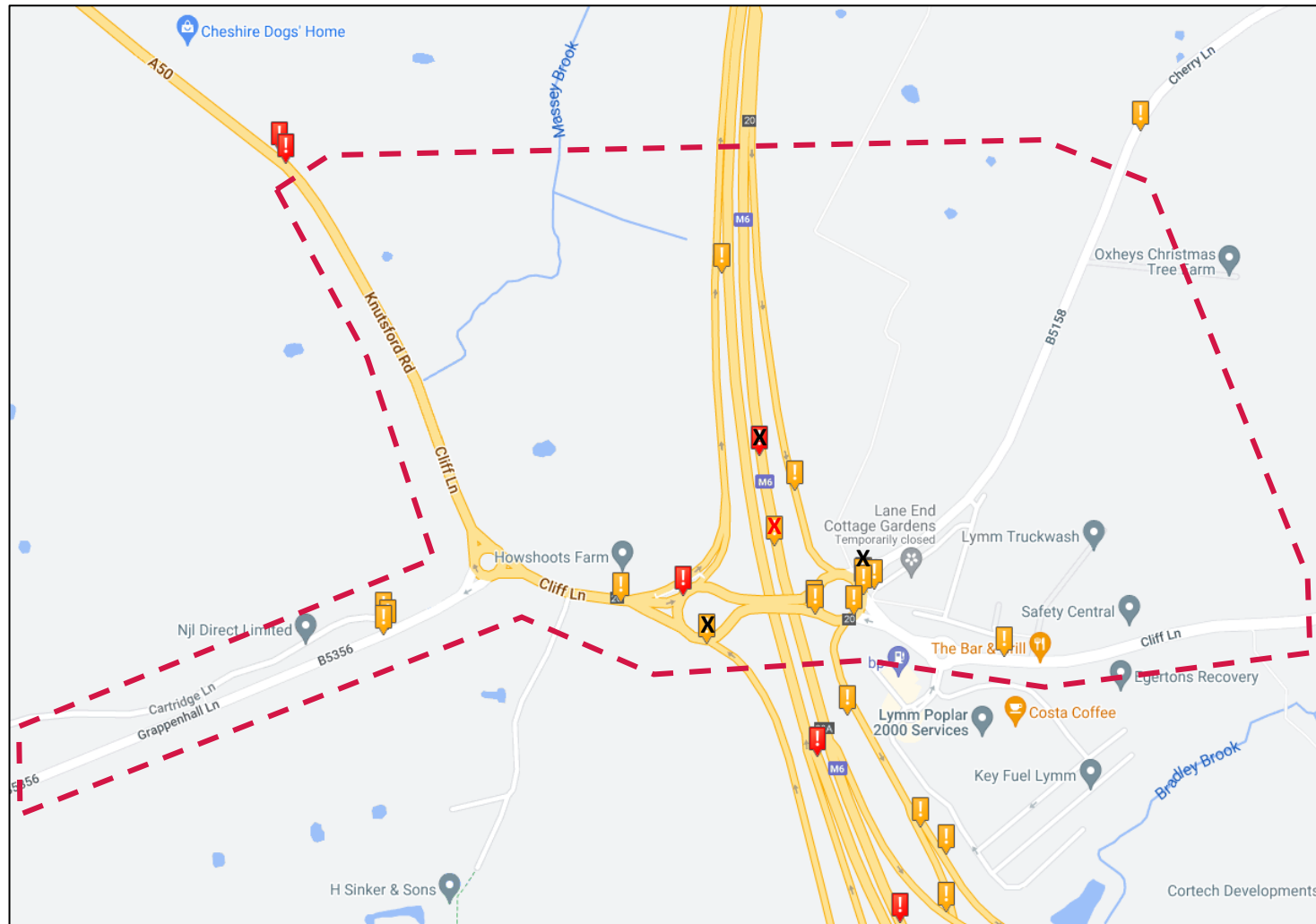
(Accidents within the study area that are marked “X” denote accidents occurring outside the study period of July 2018 – December 2021, as Crashmap releases data filtered by a yearly basis (i.e. all of 2018 – 2021))



Site Frontage and Dumbbell Roundabout Search Area:

(Accidents within the study area that are marked “X” denote accidents occurring outside the study period of July 2018 – December 2021, as Crashmap releases data filtered by a yearly basis (i.e. all of 2018 – 2021))

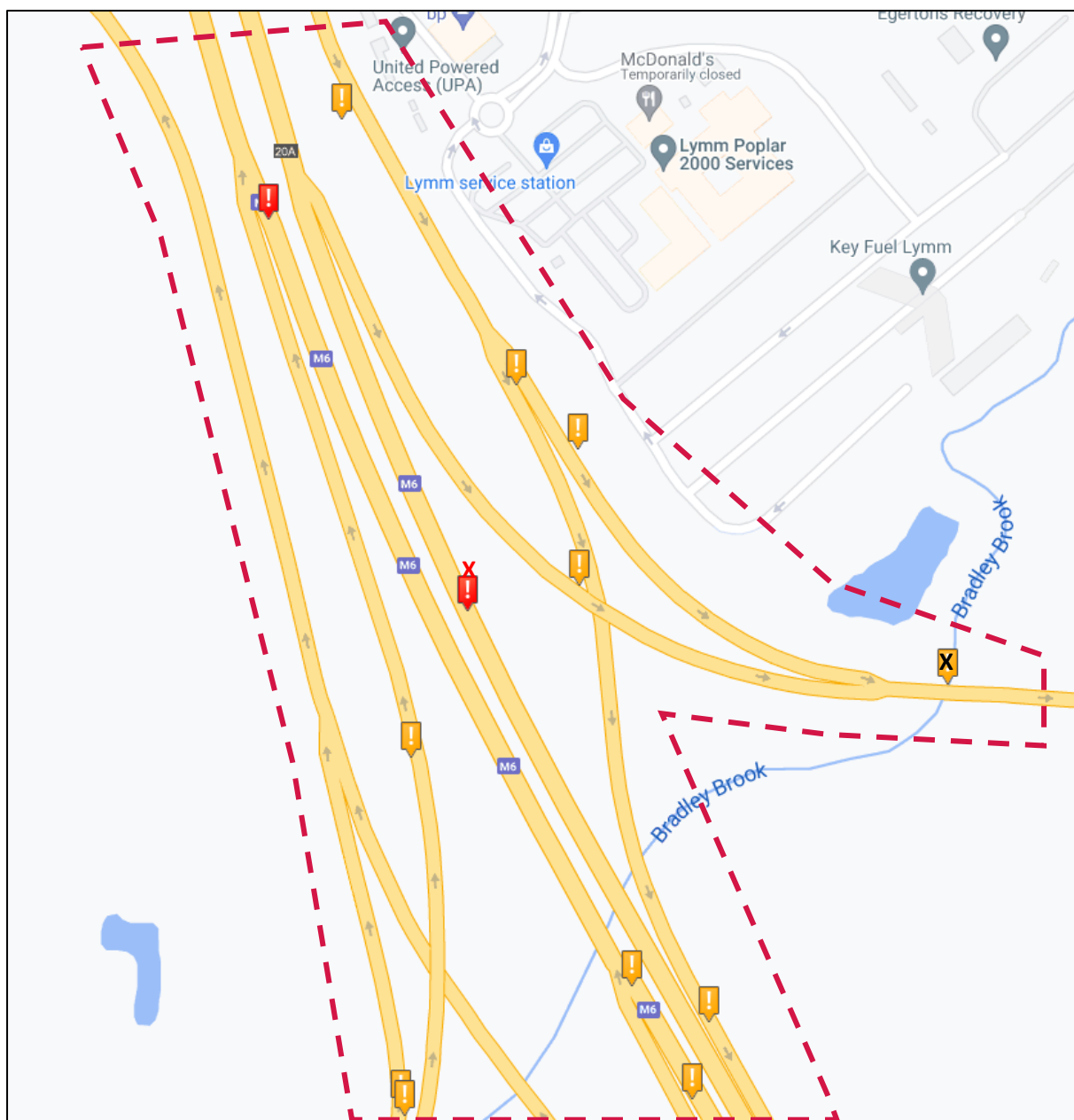
(Accidents that are marked “X” denote accidents occurring outside the study area (i.e. along the M6 under the dumbbell roundabouts))



M6 Junction 20 Merge and Diverge Points Search Area:

(Accidents within the study area that are marked “X” denote accidents occurring outside the study period of July 2018 – December 2021, as Crashmap releases data filtered by a yearly basis (i.e. all of 2018 – 2021))

(Accidents that are marked “X” denote accidents occurring outside the study area (i.e. along the M6 away from the on- / off-slips))



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Appendix AV010 – Interested Parties Summary

Interested Parties Responses

Interested Party	Concern	AV Response
Mr Andrew Thomson	The logistics sector will attract employees from outside of Warrington and this will result in an increase in traffic congestion.	The distribution of staff trips for Six:56 has been determined using journey to work census data for the Stretton Green Distribution Park as set out in Para 6.4.38 of the Transport Assessment. This methodology has been agreed with WBC Highways and NH. Peak hour traffic modelling has been undertaken using this data and I do not consider the impacts to be severe.
Mr John Appleton	Not Highways Related	N/A
Mr and Mrs Appleton	<p>An increase in HGV's and LGV's on the local and strategic road network will result in an increase in congestion on already busy roads.</p> <p>The Transport Assessment does not include consideration of the Local Plan traffic and is therefore not holistic.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>The Transport Assessment includes consideration of Local Plan traffic via utilisation of the Warrington Multi Modal Transport Model. The conventional assessments also include</p>

		the consideration of background growth, committed development and Land at Barleycastle Lane which demonstrates a cumulative assessment.
Ms Lorraine Batchelor	Concerns regarding the existing operation of Lymm services and a view that Six:56 will exacerbate these congestion issues.	Section 8 of the Transport Assessment provides detailed traffic modelling of the M6 Junction 20 and adjacent junctions. This demonstrates that the proposed mitigation at this location will offer significant benefits that result in nil detriment or betterment when compared to the base years. Neither WBC or NH have objected to the application.
Ms Helen Carson	<p>Asserts that National Highways expressed concern regarding the modelling and assessment of the Local Plan prior to the examination.</p> <p>Increased traffic on local and strategic road network.</p> <p>A lack of highway mitigation and improvements.</p>	<p>The Six:56 Transport Assessment robustly assesses the impact of the site. The assessment methodology has been agreed with NH and WBC Highways and they have accepted the findings and offer no objection, subject to mitigation.</p> <p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence.</p> <p>Highway Mitigation is proposed at the M6</p>

		Junction 20 and sustainable transport mitigation is proposed in the form of walking, cycling and public transport infrastructure, as set out in Section 6 of my Proof.
Dr Varun Chauhan	<p>Concerns that an increase in the number of HGV's on local roads will increase congestion.</p> <p>Construction impacts will prevent access via Grappenhall Lane to residential properties in Appleton Thorn and neighbouring villages.</p>	<p>The Transport Assessment demonstrates that all HGV traffic will access the site from the east. There are existing 7.5 tonne weight restrictions which prohibit HGV's from travelling to and from the west and through the village of Appleton Thorn.</p> <p>A Construction Management Plan has been conditioned to manage construction impacts on the local highway network. WBC has the ability to enforce this if the plan is not adhered to.</p>
Ms Sally Chisolm	Not Highways Related	N/A
Councillor Kenneth Critchley	<p>Concerns that the development is not multi-modal and is road dependent.</p> <p>Concerns that an increase in traffic on the South Warrington highway network cannot be supported.</p>	<p>The site currently has limited accessibility by sustainable modes of travel. However, in Section of my Proof I demonstrate how new pedestrian, cycling and public transport infrastructure is proposed to offer a genuine choice of travel in accordance with the local policies and the NPPF.</p>

		<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p>
Councillor Harris	Not Highways Related	N/A
Unrecognizable Signature	<p>Concern regarding an increase in traffic in an already congested area.</p> <p>Concern that existing weight restrictions are not enforced.</p> <p>Concern regarding the impact of road closures on the M6 and how this affects the local network.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>WBC as the Local Highway Authority have the ability to enforce weight restrictions and can involve the Police in such checks. Furthermore, operators can ensure drivers follow certain routes via the implementation of routing strategies.</p> <p>There is no transport planning policy that requires an assessment that takes into account the</p>

		<p>impact of motorway closures. The scope of assessment has been discussed extensively with WBC Highways and NH and neither have requested such an assessment.</p>
<p>Mrs Alex Collier</p>	<p>Concerns regarding traffic impact on an inadequate road network and 24/7 traffic generation.</p> <p>No information on impact on river crossings and canal bridges.</p> <p>No traffic mitigation strategy.</p> <p>No realistic transport assessment.</p> <p>No details on funding of mitigation.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>Mitigation is proposed in the form of improvements to the M6 Junction 20 and sustainable transport infrastructure. This will all be funded by the developer.</p>
<p>Mr John Coxon on behalf of Mr and Mrs Hickman</p>	<p>A note has been prepared by SCP which raises concerns with the access into Mr and Mrs Hickman's property following the introduction of mitigation.</p> <p>Concerns relate to visibility splays, access to utilities and accessibility.</p>	<p>This matter was discussed in detail with WBC Highways Officers during the post submission stage of the project and a summary is set out in Section 4.10.4 to 4.10.6.</p> <p>Neither visibility, utility access or accessibility are considered significant issues and all can be mitigated.</p>

Mrs Claire Donlan	Supportive of the proposals due to the sites location adjacent to the motorway. This will minimise highway impacts in sensitive urban areas. Also supportive of the mitigation the development will bring.	N/A
Mr Peter Ellam	Not Highways Related.	N/A
Mrs Collette Fellowes	Not Highways Related.	N/A
Mrs Rachel Garrard	<p>Concerns regarding congestion at the M6 Junction 20 and inadequacy of the local road network.</p> <p>Concerns regarding impact of road closures on the M6.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>There is no transport planning policy that requires an assessment that takes into account the impact of motorway closures. The scope of assessment has been discussed extensively with WBC Highways and NH and neither have requested such an assessment.</p>
Mrs Louise Harding	Increased congestion on the highway network.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and

		summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.
Mrs Catherine Hawley	Increased traffic and pollution.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.
High Legh Parish Council	Concerns regarding an increase in traffic and HGV's on roads in High Legh and at the M6 Junction 20.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.
Mr Mark Jervis	Concerns that delivery vehicles could be used to make local deliveries across the north west and this has not properly been assessed in the Transport Assessment.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and

		this is a position which WBC Highways and NH have also accepted.
Ms Julie Kueres	Not Highway Related	
Ms Kath Douglas Fumer	<p>Concerns relating to significant impact on traffic at peak times.</p> <p>No sustainable transport infrastructure.</p> <p>Accidents on the M56 and M6 cause issues on the surrounding highway network.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>The site currently has limited accessibility by sustainable modes of travel. However, in Section of my Proof I demonstrate how new pedestrian, cycling and public transport infrastructure is proposed to offer a genuine choice of travel in accordance with the local policies and the NPPF.</p> <p>There is no transport planning policy that requires an assessment that takes into account the impact of motorway closures. The scope of assessment has been discussed extensively with WBC Highways and NH and neither have requested such an assessment.</p>

<p>Mr William Mack</p>	<p>Pedestrian safety concerns regarding a new residential estate at Dipping Brook Avenue. (AV comment - This is located to the west of Appleton Thorn).</p> <p>Concerns regarding an increase in traffic at the M6 Junction 20 and on local roads in Appleton Thorn and Stretton. These are locations that are already congested.</p>	<p>The first point is not specifically related to the development.</p> <p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>Traffic impacts to the west of the site have been fully considered in the above referenced assessment.</p>
<p>Mr George Marsden</p>	<p>Concerns about the operation of the motorway network, especially when accidents occur.</p> <p>Incompatibility with LTP4 which encourages a focus on sustainable travel.</p> <p>Issues with the canal and river crossings.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>The site currently has limited accessibility by sustainable modes of travel. However, in Section of my Proof I demonstrate how new pedestrian, cycling and public transport infrastructure is proposed</p>

		<p>to offer a genuine choice of travel in accordance with the local policies and the NPPF.</p> <p>There is no transport planning policy that requires an assessment that takes into account the impact of motorway closures. The scope of assessment has been discussed extensively with WBC Highways and NH and neither have requested such an assessment.</p>
Mrs Sue Marten	Not Highways Related.	N/A
Dr Kevin Mcaloon	Not Highway Related.	N/A
Mr Andrew Mcquoid	Supportive given location near motorway.	N/A
Ms Helen Middleton	Existing congestion and infrastructure that cannot support new development.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.
Mr Christopher Moran	Not Highways Related.	N/A
Mr Chris Smith	Increase in congestion.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of

		Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.
Mr Edwards	<p>Concerns regarding an increase in congestion and cumulative highway impact in the residential areas to the west of the site.</p> <p>Highway safety concerns as a result of traffic levels.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>Highway safety was considered in detail in the Transport Assessment and no objections were raised by WBC or NH on this basis.</p>
Ms Helen Neish	Not Highway Related.	N/A
Mr Rodney Peterken	Not Highway Related.	N/A
Mr Richard Wright	Concerns regarding congestion at the M6 Junction 20 and inappropriate traffic routing via High Legh when motorway is blocked.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.

		<p>There is no transport planning policy that requires an assessment that takes into account the impact of motorway closures. The scope of assessment has been discussed extensively with WBC Highways and NH and neither have requested such an assessment.</p>
Ms Jill Rowan	<p>Traffic on the A50 often queues and traffic levels have got worse over the past few years. There is no bus route in the area.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>The site currently has limited accessibility by sustainable modes of travel. However, in Section of my Proof I demonstrate how new pedestrian, cycling and public transport infrastructure is proposed to offer a genuine choice of travel in accordance with the local policies and the NPPF.</p>
Mr and Mrs Webster	<p>Significant increase in traffic in South Warrington.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport</p>

		<p>Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p>
Mr Matthew Stewart	<p>The M6 Junction 20 is already very congested at any time of the day.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>My own observations outside of the traditional peak periods have suggested the junction operates well at other times of the day.</p>
Mr Tom Hardman	<p>HGV traffic on the congested M6.</p>	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p>

Mr Terry Furner	Significant traffic impacts. Cumulative impact of traffic with residential development. Issues when there are accidents on the motorway.	<p>The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.</p> <p>There is no transport planning policy that requires an assessment that takes into account the impact of motorway closures. The scope of assessment has been discussed extensively with WBC Highways and NH and neither have requested such an assessment.</p>
Mrs Bev Walsh	M6 Junction 20 is already congested and 24/7 traffic would make this worse.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.
Mrs Anette Whiteford	Congestion issues at the M6 Junction 20 and M56.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8

		of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.
Mr Jonathan Wooler	Lack of road infrastructure is already a concern and increased traffic will exacerbate this.	The traffic impact of the Six:56 development is set out in sections 6, 7 and 8 of the Transport Assessment and summarised in my Proof of Evidence. I do not consider there to be a severe impact subject to mitigation and this is a position which WBC Highways and NH have also accepted.

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