



Transportation Planning : Infrastructure Design

APPEAL DOC REF: RH/4/D

REBUTTAL PROOF OF EVIDENCE

OF

DAVID ROBERTS IEng FIHE FCIHT

ON BEHALF OF REDROW HOMES

DEALING WITH HIGHWAY AND TRANSPORT MATTERS

**PROPOSED RESIDENTIAL DEVELOPMENT
ON LAND AT WARBURTON LANE, TRAFFORD**

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1.0 INTRODUCTION

- 1.1 This rebuttal evidence is produced in response to the evidence presented by Trafford Borough Council in connection with the appeal by Redrow Homes against the non-determination of their outline planning application for 400 dwellings on land at Warburton Lane, Trafford.
- 1.2 The main evidence dealing with transport and accessibility issues for the Council is presented by Mr John Morley, but references to accessibility are also made by Mrs Bethany Brown and Ms Sarah Todd, who deal with Planning (Decision-Taking) and Strategic Planning respectively. I limit my rebuttal to responding to specific matters raised by their evidence and do not seek to introduce any new evidence.
- 1.3 This rebuttal should be read in conjunction with my main proof of evidence and the Statement of Common Ground relating to Highway, Traffic and Transport Matters.
- 1.4 It is to be noted that whilst my rebuttal evidence does not comment on every aspect of the Council's evidence, this should not be taken as agreement, since there is nothing in this rebuttal evidence that diminishes any aspect of my main evidence.

2.0 EVIDENCE OF MR JOHN MORLEY

- 2.1 At paragraph 2.3, it is confirmed that the trip rates used in the analysis of the development traffic impact are higher than other areas of Trafford and Greater Manchester. The Statement of Common Ground agrees that the trip rates used in the assessment are reasonable but in the context of other evidence, it is useful to note that the trip rates can be regarded as robust.
- 2.2 At paragraph 3.10, it is stated that the traffic impact of the development is mitigated by the agreed improvement to Flixton Crossroads, but also that the improvement does not obviate the need for the Carrington Relief Road (CRR). It is accepted that the CRR is required by the Council to accommodate the full scale of the development at Carrington and also to remove existing congestion, but it is not the responsibility of a developer to remove existing congestion; simply to mitigate the impact of their development.
- 2.3 At paragraphs 4.4 & 4.5 there is reference to Core Strategy Policy SL5 which deals with the Carrington development area and contributions to highway improvements and public transport improvements for development covered by that policy. Whilst my client has no difficulties with that policy, the appeal sites are outside of that policy area and have been agreed through the Transport Assessment to deal with its own impacts, and not those of Policy SL5. Clearly it would be inappropriate for the development to have to address both its own impacts and also contribute to additional matters covered by a Policy for other sites. The principles are similar, in that both Policy SL5 and the appeal sites require highway improvements and public transport improvements, and there is no conflict in this respect. The Highway Consultation Responses included as Appendix 5 to Mr Morley's evidence are not referred to in his evidence but clearly show the topics of discussion for reaching agreement on the Transport Assessment.
- 2.4 At paragraph 4.7 it is stated that the Carrington Relief Road is required by policy in order to accommodate even just SL5 development and to unlock severe existing conditions on the A6144. However, it must be noted that some development is already approved within the area covered by Policy SL5, subject to mitigating its own impacts, as detailed in Section 3 of the Transport Statement of Common Ground, and it must follow that only where the impacted cannot otherwise be mitigated that the CRR is required. At no time during the consideration of the planning application has the highway officer mentioned that CRR is required to support the approval of the appeal proposals, as is clear from Appendix 5 of Mr Morley's evidence.
- 2.5 At paragraph 5.1 there is reference to the infrastructure that may be needed to support the draft GM45 development area. Whilst I understand that GM45 carries little weight, and there is no certainty that it will come forward, the proposals would not prejudice the provision of infrastructure to accommodate a wider development. It has been demonstrated that a link road could be

provided through the eastern appeal site and the development would contribute to public transport infrastructure improvements and provide funding for improved bus services.

- 2.6 At paragraph 5.5, the Council's argument seems to be that if the appeal proposals come forward at this stage, it could pre-determine the route of the suggested Southern Relief Road. This is not the case. It has been demonstrated that a link road could be provided or protected through the site. This would include a 6.75m wide carriageway to accommodate buses, if necessary. Furthermore, the proposed junction onto Warburton Lane to serve the site is located at the only realistic gap in the site frontage to accommodate such an access. The access has been designed with a high level of capacity, including separate left and right turning lanes onto Warburton Lane, and again, if necessary, traffic signals could be added in the future without difficulty. Of course, any future Southern Link Road could be outside of the site, perhaps utilising the Moss Lane junction, or taking an even more southerly route away from what I understand to be 'sensitive' housing on Moss Lane.
- 2.7 At paragraph 5.6, the Council seek to suggest that Partington has limited facilities that would require residents to drive further afield. This appears to misrepresent the level of facilities in the local centre, which have been set out previously in paragraph 7.4 of my main evidence and paragraph 6.4 of the Transport Statement of Common Ground, and are wide ranging. Indeed, the facilities were considered sufficient to allocate development in Carrington, which are further away from the centre of Partington than the appeal sites. The comment that only 6% of trips are likely to remain in Partington and that 63% of trips are likely to be by car fails to acknowledge that this would be the same for any site in Partington, even if it were within the local centre, since it is based upon census data for the existing settlement and not specific to the appeal site alone. This is confirmed by the table at 1.5 in Appendix 3 of Mr Morley's evidence which shows that the same 63% of trips from that development can be expected to be made by car, using the existing census data. Much of the data in the Transport Assessment was based upon agreements that had been used for the approved developments at Carrington, to ensure that the developments were assessed on a consistent basis. At no time during the consideration of the planning application has it been suggested by the Highway Officers that the access route, or the distance, to the shops and other facilities in Partington were unacceptable. The standard guidance is that distances of up to 2km offer the greatest opportunity for people to walk rather than make a car journey, and the facilities are within 2km of the appeal sites.
- 2.8 At paragraph 5.7, it should be noted that the proposals for new footbridges across Red Brook from each of the appeal sites were withdrawn, in part due to the highway responses to these proposals. They were proposed with a view to provide more route choices for pedestrians and cyclists, but the resistance received from the Council to these proposals meant that they were

withdrawn, since some of their requirements, for example relating to overcoming steps on an existing pedestrian route to Oak Road, cannot reasonably be achieved.

- 2.9 At paragraph 5.8 there is cross reference to the evidence of Mrs Bethany Brown, which I deal with separately, however, it seems to suggest that there is an 80m section where there is no footway, that affects the integration of the site with the surrounding area. Whilst it is not specific, I can only assume that this missing footway reference is from the western site access to the Red Brook bridge on Warburton Lane. To suggest that this is a consideration in the 'Integration and Accessibility' of the development is misleading, since it is proposed to provide a footway as an integral part of the development proposals, to ensure that there is a continuous link from the site accesses to the centre of Partington.
- 2.10 At paragraph 5.9 the 'distances and inadequacy of footway provision' are raised as an issue, along with infrequent public transport, that the Council say will encourage use of motorised vehicles. The frequency of public transport is dealt with in the Statement of Common Ground and also in my main evidence, and will be further discussed later in this rebuttal based upon the document submitted in Appendix 4 to Mr Morley's evidence. However, it must be noted again that the distances to local facilities are within acceptable distances and that there is a continuous segregated pedestrian route from the site to all of the local facilities, utilising the existing highway network and new infrastructure on the site frontages to link to the existing pedestrian network.
- 2.11 At paragraph 6.1, there is clearly a very significant disagreement in the assessment put forward by Mr Morley to suggest that the existing bus services are 'seriously deficient'. It is highlighted in Mr Morley's Appendix 4 that Partington is an area of low car ownership, yet the Transport Authority has provided the residents with a level of bus services that the Council regard as seriously deficient. As I have set out in Section 6 my main evidence, I believe that 6 existing buses per hour, along with an additional service funded by the development to provide 7 buses per hour, serving a wide range of destinations, is an existing good level of provision, that will be further enhanced by the development offer. If the site were to be promoted under the currently uncertain GM45 allocation, or as a standalone extension of the built-up area, the contribution to public transport would be similar and, even as a part of a wider development area, the development parcels would not all come forward at the same time so the public transport improvements would be incremental.
- 2.12 At paragraph 6.3 it is calculated by TfGM that the revenue generated by customers from the appeal site could be in the range £40k - £78k. This seems to take no account of other customers along the route who use the existing service or who would be attracted by an increased level of service, but would go some way to off-setting the subsidy level suggested to be £150k for a

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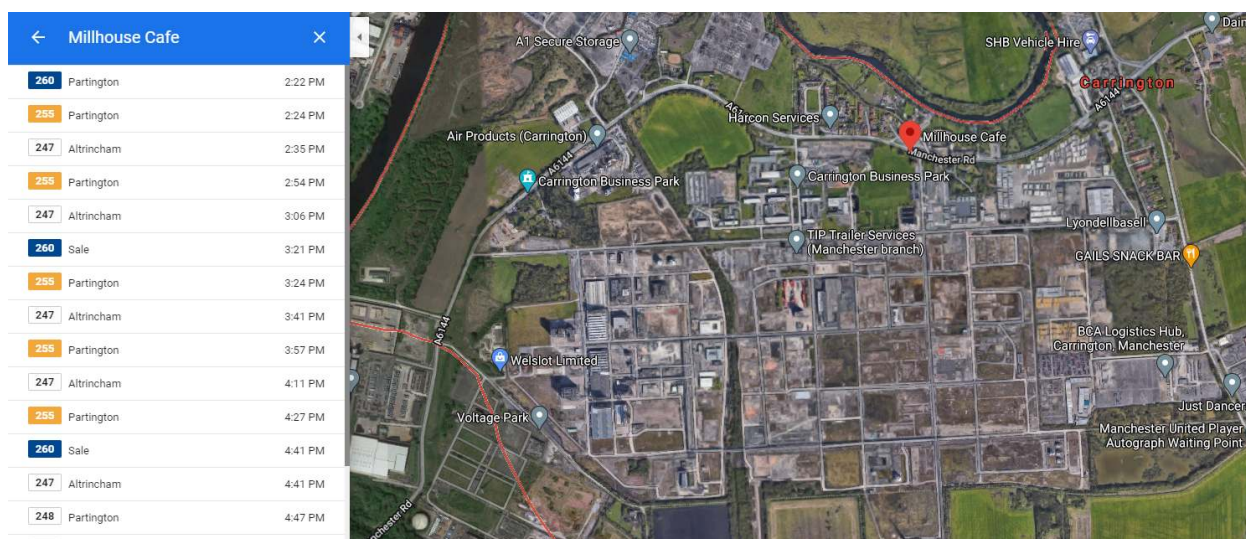
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daytime only service. Nevertheless, it has been agreed to contribute this £150k to provide an additional daytime service, and an additional £50k to extend the service into the evening.

2.13 At paragraph 6.4, the Council claim that development of the appeal sites cannot be supported without a holistic approach of the wider New Carrington area. This wider New Carrington area has no certainty of going ahead, and as described in my para 2.13 above, even as part of a wider development area, the funding and planning of improvements would be incremental. The appeal proposals could offer the opportunity for subsequent developments in a wider New Carrington area to build upon the improvements instigated by the appeal proposals. It is noted that Section 7 of Appendix 4 to Mr Morley's evidence introduces even further claims for minimum necessary improvements, which I will comment upon later, but bear no resemblance to the scale and impact of the appeal proposals, although the appeal proposals are consistent with the aims and contribute to some of the measures identified.

2.14 At paragraph 6.5, the Council confirm that the SL5 development area at Carrington is required to improve public transport infrastructure. The improvements are not described, but it should not be a requirement for the appeal site to satisfy both its own impacts and those of SL5, which may be implied by this paragraph, and which the site does not form part of. However, the appeal proposals are consistent with the broad policy aims and improve both the service frequency and the infrastructure. Whilst there should be no debate over which location has the best public transport provision, but only whether that provision is satisfactory to serve the development, my investigations have indicated that it is misleading to claim that areas further north of the appeal site have better public transport services than the appeal site. The screenshot below shows that the Carrington development area currently has 5 buses per hour within walking distance, which is less than the appeal site, and no services to Lymm or Warrington:



Service No.	Terminal Points	Daytime Frequency
247	Altrincham - Trafford Centre	2 per hour
255	Partington – Manchester Centre	2 per hour
260	Sale Circular	1 per hour

2.15 Furthermore, in relation to paragraph 6.5 of Mr Morley’s evidence, it is to be noted that Section 7 of Appendix 4 now seeks much more work than both Mr Morley and I have previously been made aware of. Whilst Mr Morley refers to a requested contribution of £2.025m, which is addressed in my main evidence, TfGM has now added in further requests:

- a) A further £576k for an improvement to the A56 in Altrincham.
- b) A contribution towards an improvement at the Flixton Crossroads junction which is suggested to cost £2.916m, to improve bus journey times, for which there is no background provided and we have no knowledge of whether this is compatible with the agreed improvement for the appeal proposals.
- c) A further contribution towards an improvement at Sale Metrolink station suggested to cost £1.051m.

Needless to say, the status of these requests by TfGM is unclear since they are not addressed in the evidence of the Council, but are not acceptable to my Client as being relevant to the scale and impact of the appeal proposals.

2.16 At paragraph 6.7.2, the Council imply that the existing bus subsidies for the services around the appeal site, and no doubt the other areas served by the bus routes, could be withdrawn at any time and there would be no bus, or limited bus services provided. Clearly, it is not the responsibility of my Client to ensure that Partington has bus services in the future, if TfGM remove their subsidies, but the agreement to fund a service by my Client for a five years period would appear to be the only guaranteed service in the area for that period, if the appeal proposals are allowed.

3.0 REPORT BY TFGM – APPENDIX 4 OF MR JOHN MORLEY’S EVIDENCE

- 3.1 Section 2 of the report seeks to suggest that bus travel is not attractive due to bus journey times in particular to Manchester city centre. However, there is no comparison with other means of travel, that could be implied to be more attractive. In the Partington and Carrington area, the buses travel in the same lanes as all other traffic, so the local journey times are similar. However, closer to Manchester city centre, there are bus lanes which allow bus journey times to be quicker than other road traffic. The choice of whether people travel by car, bus, train, tram etc, is not simply a factor of the bus journey time, as discussed in my main evidence at para 6.22.
- 3.2 Section 3 of the report provides a census analysis image which claims to show that Partington has a high ‘average distance to work by car per resident’. However, the image simply shows that the further away from Manchester city centre that a location is, the longer the length of the car journey is. The vast majority of the outer element of Greater Manchester is red, with only a minor number of exceptions, perhaps where the Metrolink serves a town.
- 3.3 Section 3 also makes assumptions that the residents of the appeal site will be the most affluent in society, with each home having parking available and most properties having a garage. It should be noted that there is no house design that is being sought for approval, but the inference of the report is that a house that complies with current policies relating to parking provision is aimed at people who will travel by car. Of course, it is not acceptable to build a house without car parking in the vast majority of situations.
- 3.4 From the assumption that the affluent residents on the appeal sites will more likely travel by car, the report claims that there will be increased congestion on the local road network. This ignores the fact that the traffic impact of the development has been agreed to be mitigated where necessary.
- 3.5 Section 4 of the report claims that the appeal sites have much poorer public transport than is typical in Greater Manchester. This is a sweeping statement which does not take into account that many homes do not have a bus stop within 400m, or they have access to a single destination, to which the resident does not wish to travel. The appeal sites have a choice of buses, the vast majority, if not all, homes would be within 400m of a bus stop and the frequencies are regular. As mentioned previously, the appeal sites have better bus services than the approved developments in Carrington, for example.
- 3.6 It is stated that a study is being carried out into bus transport in Partington and Carrington as part of the New Carrington proposals. It is not claimed that the proposals would prejudice that study, but clearly the study has no current bearing on the appeal proposals. Moreover, the agreed bus

contribution can be used by the Transport Authority in any way that they see fit to serve the appeal sites and the wider community.

- 3.7 Section 5 of the report states that the Council policy is to prioritise development in the most accessible locations; within 800m of metrolink, rail station or bus station, or within 400m of a quality bus corridor. Clearly, this has not been the case with the committed development in Carrington and is a test that has not been applied previously in this area. The strict application of this guidance would blight any development in Carrington and Partington.
- 3.8 Section 6 of the report sets out the Council's aims to promote new Carrington with associated improvements to public transport. The draft policy requirement for New Carrington is to deliver or contribute to measures to improve access to more sustainable transport choices. The development is consistent with this draft policy.
- 3.9 TfGM suggest that very significant work is needed to support the wider New Carrington proposals and they claim that only by delivering the whole of New Carrington will it be possible to elicit the quantity of developer contributions to undertake their plans. Whilst this aim is unworkable, due to no consideration being given to the link between the public transport improvements and their affordability by further development, it is clear that the appeal proposals contribute to achieving improved public transport services and improved bus stop infrastructure, and do not prejudice any other measures, or aims, that may, or may not, be included in future policies.
- 3.10 TfGM suggest that there is a risk that the land needed for public transport improvements could be lost if the appeal proposals were to be approved, however, there is no congestion around the appeal sites that could require bus priority measures and none of the items listed in the improvement schedule are affected by the appeal proposals.
- 3.11 It is suggested by TfGM that the drip-drip' approach, as they describe it, to public transport improvements could potentially compromise a wider strategy for New Carrington, however, there is always likely to be an incremental approach to improvements, especially on the scattered approach to improvements identified in their table of works. It is therefore perhaps more important for TfGM to spend the contributions that they collect wisely, to meet their own aspirations. The contributions must be affordable and reflect the scale and impact of the development, which is the approach taken with the appeal proposals.
- 3.12 In Section 7, it must be reiterated that there is a discrepancy between what TfGM include in their table, the requests made by the Council in their evidence, and what has been communicated to my Client in the past. However, the public transport infrastructure improvements and the bus service improvement contribution that are offered as part of the appeal proposals, reflect the

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affordability and the scale and impact of the proposed development, which are consistent with the wider improvements that TfGM wish to see.

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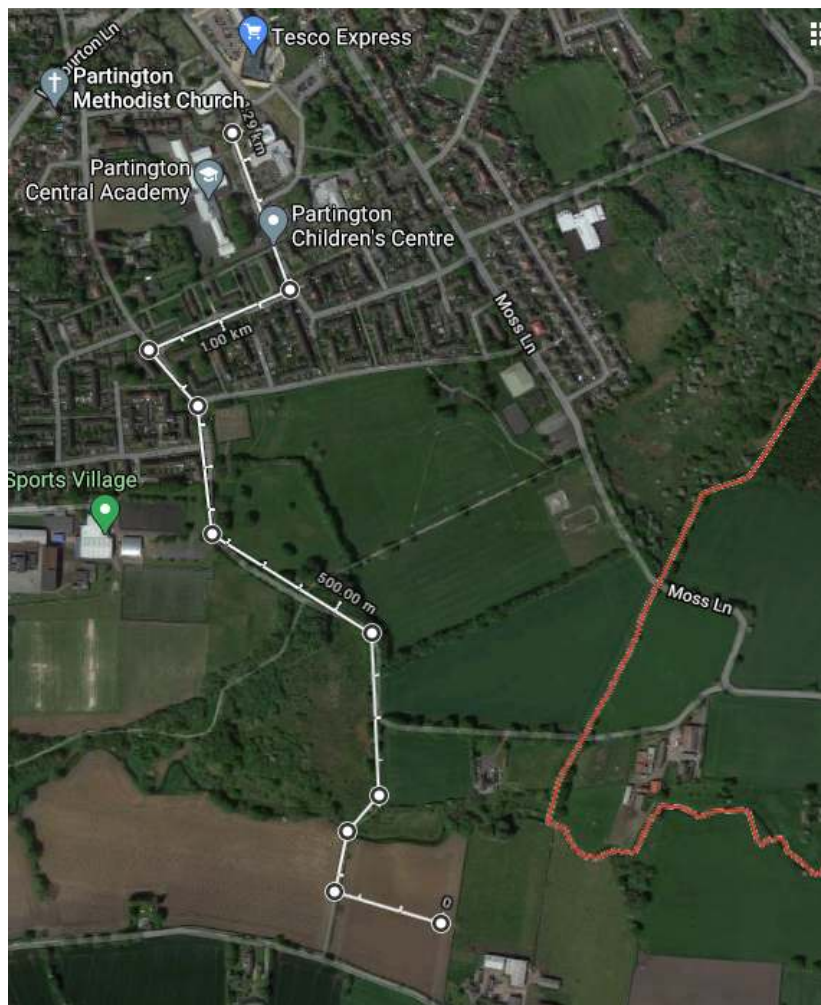
4.0 EVIDENCE OF MRS BETHANY BROWN

- 4.1 This evidence deals with Integration and Accessibility of the development proposals in paragraphs 4.19 to 4.25, and 4.34 to 4.35.
- 4.2 Paragraph 4.20 states that the northern boundary of the appeal site is ‘critical’ in seeking to connect the appeal sites with Partington. However, from an accessibility point of view, the aim is to provide opportunities to use sustainable modes of travel, where guidance confirms that walking offers the best opportunity to replace a car journey of up to 2km, cycling offers the best opportunity to replace a car journey up to 5km, and having a bus stop within 400m of a dwelling offers the best opportunity to encourage people to use public transport. Therefore, if the accessibility aims can be achieved, irrespective of the northern site boundary being Red Brook, then the ability to cross Red Brook cannot be described as critical.
- 4.3 Paragraphs 4.21 and 4.22 confirm the walking measurements from the centre of each site using the available and proposed infrastructure and reaffirms that there are no services, shops or other facilities in Partington that are outside of the acceptable walking distances.
- 4.4 In paragraph 4.23 there is an error in the measured distance suggesting that the eastern edge of the site is 700m further away than the measurements discussed previously. It should be noted that the measurements in para 4.21 and 4.22 are taken from the centre of the site, and the furthest part of the appeal site is some 350m from the centre. Central Road in the local centre is some 2km from the most eastern part of the site if residents were to walk the entirety of the access road to reach Warburton Lane, but there is a shorter public footpath route to Chapel Lane which is included in the agreed measurements in Appendix 5 of the Highway Statement of Common Ground. The most easterly part of the eastern appeal site is within 1.3km of the local centre via the public footpath and Chapel Lane; closer than the centre of the site, as shown on the measured plan below:

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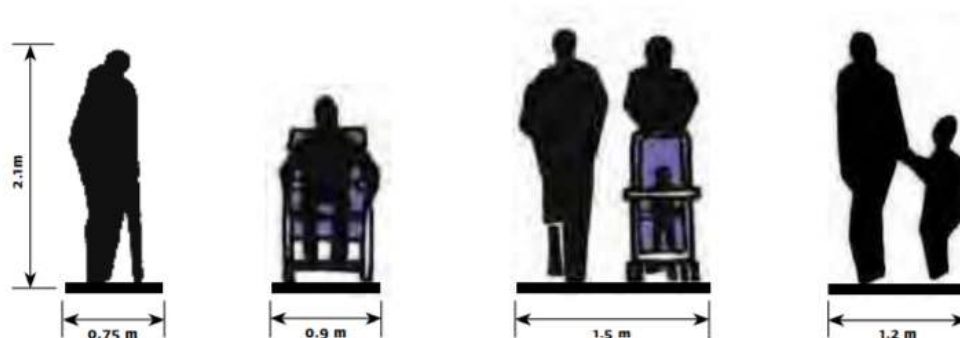
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- 4.5 Paragraph 4.24 seeks to consider the acceptability of the site location against an 800m 'reasonable walking distance'. Technical guidance does not advocate 800m being an upper limit of walking distances, indeed if it were then 50% of existing Partington homes and the whole of Carrington are outside of this distance and there would be virtually no ability to provide new homes in any part of Carrington or Partington.
- 4.6 Paragraph 4.25 acknowledges the existing public footpaths through the site, that are to be retained and enhanced as part of the development, but appears to give no weight to their future use, in particular the convenient route to the local centre via the north south public footpath, which is shown in the photograph above.
- 4.7 Paragraph 4.34 seeks to summarise the accessibility issues that the Council have, but then suggests that as part of a wider masterplan the issues can be overcome. Whilst I do not believe that the appeal proposals are unacceptable in accessibility terms, the Council's conclusion about the issues being overcome by a masterplan is not explained further, but there is no evidence to suggest that the proposals would prejudice a future masterplan, where linkages to the surrounding area can be further enhanced as additional land is developed.

- 4.8 In paragraph 4.35 the Council introduces a case that accessing local facilities is problematical. In terms of distances, most people will have the choice as to whether they walk to these facilities and transport planning is about providing opportunities and choices, since people cannot be forced to use any means of transport. Choice is not generally recognised to be a problem.
- 4.9 A further issue of the width of existing footways to accommodate prams and wheelchairs is introduced, along with reference to the section of 80m on the western side of Warburton Lane, south of Red Brook bridge, where there is no footway. I am not aware of any objection or concern in relation to the works proposed between the site accesses and the Red Brook bridge. These works are shown on the agreed drawing included in the Transport Statement of Common Ground. Further north of Red Brook bridge, there has been no specific evidence of areas where prams and wheelchairs would have difficulties. The footways north of Red Brook are used to access the secondary school in Partington and it would be surprising if the footways around schools are determined to be a problem by the Council, since safe routes to schools are a priority for most Authorities. In terms of wheelchair users, the minimum width required by a wheelchair user that hand-propels their own wheelchair is 900mm and the minimum width for an adult walking with a child is 1.2m. These dimensions are included on page 68 of Manual for Streets, with an extract provided below:



- 4.10 Whilst the recommended minimum width of a new footway is 2.0m, there can be no reasonable expectation that a developer should be responsible for rectifying deficiencies within an existing built up area, in particular an area around a school where the Council has no plans of its own to improve matters, which suggests that it does not have a problem with the existing conditions. There is certainly no specific problem area identified.

5.0 EVIDENCE OF MS SARAH TODD

- 5.1 Section 5 of this evidence deals with the masterplanning of the wider New Carrington as part of the draft GMSF. This is dealt with more in the Planning evidence to this Inquiry but from a Transport point of view it is drawn upon by the evidence of Mr Morley and others to seek to suggest that the appeal site will prejudice the wider masterplan, when that masterplan is at an early stage and carries little weight. As a principle, the masterplanning of a wider area will have far more constraints to negotiate than the impacts relating to the appeal proposals, notwithstanding my views throughout that the appeal proposals will not prejudice a wider masterplan.
- 5.2 Paragraph 5.10 states that the work on the masterplan is currently 'high level' but it then suggests that the logical route for a southern link road is through the eastern appeal site. This may or may not be the ultimate result of the masterplan, and there is no certainty that the draft allocation will be taken forward in any format.
- 5.3 Paragraph 5.11 states that the appeal proposals make no provision for a southern link road, however, without any expressed view from me on whether or not a southern link road would be most appropriately located through this site, there should be no dispute that the proposed site access is capable of accommodating a high level of traffic, much higher than that likely to result from the development alone, and a route for a link road, capable of accommodating a standard bus route of 6.75m width, can be provided or accommodated through the site as part of a reserved matters application.
- 5.4 Paragraph 5.12 suggests that a more detailed phasing plan will be developed for a wider New Carrington area, but, as discussed in my main evidence, if there is to be a wider development area, and a southern link road, then the appeal site would logically form the first phase of that development, whether it contains a southern link road or not, since it would most likely be the catalyst to further development that would be accessed to the east and north of the appeal site.
- 5.5 Paragraphs 5.14 and 5.15 look at how the appeal proposals could be linked to further development to the north and east but do not identify any specific issues that would prejudice further development, if it were to take place.
- 5.6 Paragraph 7.9 expresses a view that whilst the appeal proposals offer a public transport contribution to increase the frequency of existing services in the area, this would not be effective on its own. However, this takes it lead from the public transport report which in my view is simply wrong to suggest that 7 buses per hour is not a good service, when those buses serve a number of different destinations, and provide a higher level of service than the approved development that this Council has supported in Carrington, for example.

6.0 SUMMARY

- 6.1 Overall, it remains my view that there are no highway, traffic or transport reasons to resist the grant of outline planning permission on the appeal sites and that the proposals are acceptable in the short term, and do not prejudice the longer term aims of the Council, although there is no certainty of if, or when, the longer term aims will go ahead.