From: To:	Local Plan
	Local Plan
Subject:	Representations to the Main Modifications
Date:	25 April 2023 11:33:51
Attachments:	image001.jpg
	image002.jpg
	image003.jpg
	image004.png
	image005.jpg
	image006.png
	image007.png
	image008.png

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Learn why this is important

To whom it may concern

We act on behalf of Patrick Properties and have previously made submissions to the Local Plan. Representations to Main Modifications MM002, MM005, MM007 and MM021 are being made directly online.

The reason for this email is to confirm that Patrick Properties continue to work alongside St Modwen's in respect to the promotion of land south of Birchwood railway station. Regards

Alban

Alban Cassidy BA (Hons) Cert. Ecol. MSc MIEMA MRTPI C.Env Director					
Chartered Town Planner and Environmental Consultant	2				
?					
2	?				

 From:
 Local plan web form on behalf of Main modifications consultation

 To:
 Local Plan

 Subject:
 Local plan main modifications consultation 3

 Date:
 25 April 2023 12:16:25

 Attachments:
 Image: Consultation 1

Submitted on Tue, 25/04/2023 - 10:14

Submitted values are:

#### Your information

Your name Alban Cassidy

#### Organisation (if applicable)

Cassidy + Ashton on behalf of Patrick Properties

Address

Phone number

Email address

#### Modification response

Which main modification or consultation are you responding on? MM021

Is the main modification legally compliant? Yes

Is the main modification sound? No

#### Why do you consider it is not sound (max 2000 words)

The proposed Main Modification MM02 does not satisfy the requirement to be sound in that it is not positively prepared, it is not justified and it will not be effective.

Not Positively Prepared -

MM021 will not result in Warrington meeting its Objectively Assessed Housing Needs for Employment Land for the reasons set out by ourselves and others [notably Savills] in previous representations. The reliance upon one employment allocation at Fiddlers Ferry is a negative approach and means that the only significant new employment development opportunity is in the hands of a single developer on a site where there are major issues due to the legacy of the previous use as a power station.

Not Justified -

There is insufficient justification presented for the over reliance upon one key employment allocation which itself has major uncertainties in delivery.

Not Effective -

By only having one major new employment allocation in Warrington, the local plan will not be effective in stimulating and growing the local economy at a time of stagnant national economic growth and amidst a cost of living crisis.

### Detailed response and document upload

#### Detailed response to main modification (A maximum of 5000 words, which equates to roughly 10 sides of A4 paper)

Main Modification MM021 does not address the objections previously submitted by Patrick Properties in respect to the Warrington Local Plan. Those representations (attached for ease of reference) demonstrated the substantial benefits of allocating land south of Birchwood Railway Station for employment development.

The allocation of that land would have resulted in a substantial benefit to the local economy through the creation of a major employment development and hundreds of jobs but also a major improvement to the public transport network and environmental improvements.

The major reduction in the amount of employment land allocated in the local plan means that this is now a missed opportunity.

Furthermore the major reduction in employment land has resulted in only one major new site being allocated for employment development which is in the control of a single developer and is subject to major uncertainty given its history as a major power station.

Given the substantial reduction in employment land it would have been expected that safeguarded land may have been identified which would have allowed for flexibility in the event of any change in circumstances without the need to review the local plan which would inevitably take a substantial period of time. If safeguarded land was identified it would mean that such land could be released early without a full review of employment land

requirements/local plan review and therefore allow a rapid reaction to such a change in circumstances.

It is acknowledged that the Local Plan retains a commitment to an Employment Land Review but this needs to be undertaken immediately with safeguarded land identified in advance to cover all eventualities.

The local plan following the proposed Main Modifications can only now follow a very narrow path in respect to employment land and does not incorporate any flexibility that could potentially allow a rapid reaction to any change in circumstances such as changes in demand in the local economy, any major delay in delivery at Fiddler's Ferry or changes in national policy. This could be potentially catastrophic for Warrington if adjoining areas are able to react quicker to any change in circumstances.

## **Proposed Submission Version Local Plan**

## PART A - About You

1. Please complete the following:						
Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.						
Name of person completing the form: Email address:	Alban Cassidy					
<ol> <li>What type of respondent are you? Please select one option only.</li> <li>If you are an agent please select the type of client you are representing.</li> </ol>						

A Developer / Landowner



## **PART B - Representation Form 1**

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Warrington in Context

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy
MD2.1 part 3 or paragraph 10.2.13 etc as applicable).
Para. 2.2.2

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Legally Compliant X

Sound X

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Although the general tenet of the paragraph is supported in identifying the key challenges facing the Borough which include limited employment land supply, car dependency, traffic congestion and aging infrastructure, the key challenges should also refer to "constrained railway services."

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The list of bullet points under para. 2.2.2 should include: "Constrained railway services."

This will ensure that this issue can be addressed elsewhere in the plan.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. This is relevant to constrained railway services.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Warrington in Context.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 2

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Warrington in Context

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Paragraph 2.2.4

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	Х	
Sound		Х
Compliant with the Duty to Co-operate	х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

The future opportunities for Warrington should also include "Enhancement of railway services and the provision of new park and ride facilities."

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

An additional bullet point should be added to para. 2.2.4 to say: "Enhancement of railway services and the provision of new park and ride facilities."

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. Enhancement of railway services and provision of park and ride is inherently linked to this.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

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### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Warrington in Context.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## **PART B - Representation Form 3**

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Vision and Spatial Strategy

2. What does your comment relate to? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

Section 3.1 Vision and the Vision Statement set out in the box following paragraph 3.1.3.

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Legally Compliant X

Sound X

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Although the vision correctly refers to Warrington consolidating its role as one of the most important economic hubs in the UK and that it will see the development of major new employment locations, there should be more reference to improvements to the existing public transport system, in particular the railways with the opportunity for upgrades to the CLC line through the creation of a new access to Birchwood railway station and the provision of park and ride and other improvements. This will ensure that the benefits occur within the current local plan period and not only in the long-term future.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The vision should include reference to improvements to the existing public transport system, in particular the railways with the opportunity for upgrades to the CLC line through the creation of a new access to Birchwood railway station and the provision of park and ride and other improvements.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. These include the provision of turn backs, station improvements and a park and ride.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

**Comments/file description** South Station Place Framework Document and Appendices

You have just completed a Representation Form for Vision and Spatial Strategy

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 4

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Vision and Spatial Strategy

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Paragraph 3.1.13

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Х

Legally Compliant X

Sound

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Para. 3.1.13 refers to the Warrington Local Transport Plan but no account is taken of the contents of Table 4 of the LTP which refers to the CLC line (capacity and service improvements) and Birchwood Park and Ride as this is one of a number of schemes supported by Transport for the North which can now be delivered through the Warrington Local Plan.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Para. 3.1.13 should be amended to also make reference to the Birchwood park and ride as a key aim as referred to in the Local Transport Plan.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination to demonstrate conformity with the Local Transport Plan.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

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### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Vision and Spatial Strategy.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 5

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Vision and Spatial Strategy

2. What does your comment relate to? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Objectives as set out in the box following paragraph 3.2.3, namely objectives W1, W2, W4 and W5

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	х	
Sound		х
Compliant with the Duty to Co-operate	х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Objective W1 fails to make sufficient provision to meet the employment land needs of the Borough. Objective W2 fails to ensure the long-term permanence of the revised green belt boundaries by failing to make sufficient provision for additional employment land.

Objective W4 fails to give sufficient weight to the importance of providing new public transport infrastructure.

Objective W5 is supported. It is essential to secure high-quality design.

Objective W6 is supported. It is essential to support development that reduces carbon emissions.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The objectives should be revised as set out in box 4 above.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The proposals have a direct relationship with a number of the objectives set out in the Local Plan.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

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Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Vision and Spatial Strategy.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 6

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Vision and Spatial Strategy

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Paragraph 3.2.8

3. Do you consider the Draft Local Plan to be: Please select one option in each row.
 Yes No
 Legally Compliant X
 Sound X
 Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Not applicable.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

The release of land from the green belt to meet Warrington's development needs is supported and therefore this element of the plan is sound as there are exceptional circumstances which make green belt release necessary in this local plan.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Not applicable.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Vision and Spatial Strategy.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

### PART B - Representation Form 7

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Vision and Spatial Strategy

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy **MD2.1 part 3 or paragraph 10.2.13 etc as applicable).** Paragraphs 3.3.1-3.3.4 and Figure 3.

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	Х	
Sound		Х
Compliant with the Duty to Co-operate	х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

The Spatial Strategy as proposed in the local plan is not acceptable. It is heavily dominated by sites in the south of the Borough where infrastructure provision is poorer and the impacts of development upon the environment would be more pronounced. Development to the east of Warrington, where it can be assimilated with public transport improvements should be included in the spatial strategy.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The Spatial Strategy should be amended to incorporate development on the east side of the Warrington built up area, specially in respect to the identification of South Station Place for development.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The proposed development would have a beneficial impact upon the Spatial Strategy.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Vision and Spatial Strategy.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## **PART B - Representation Form 8**

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Vision and Spatial Strategy

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Paragraph 3.3.18

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Legally Compliant X

Sound X

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

It is not accepted that an urban extension to the east of Warrington would have significant ecological impacts as there is sufficient land available outside of any designated mossland or areas of biodiversity significance and the minerals reserves are not of such significance such that they would prevent development taking place.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The final bullet point to paragraph 3.3.18 in respect to an urban extension east of Warrington should be deleted as the land is required to facilitate access to Birchwood Station and a employment and community hub. It would not result in harm to ecological interests nor mineral reserves.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

# If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The relationship of the site with adjoining designations is a key element for the consideration of the site.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

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**Comments/file description** South Station Place Framework Document and Appendices

You have just completed a Representation Form for Vision and Spatial Strategy.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 9

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Vision and Spatial Strategy

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Paragraphs 3.3.23-3.3.26

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Х

Legally Compliant X

Sound

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Cumulatively these paras. fail to make sufficient provision for additional employment land at South Station Place, Birchwood. This will result in a shortfall of employment land within the Borough that is brought forward through the plan period and consequently a reduction in economic growth. In particular the land at South Station Place should be listed in para. 3.3.23 as one of the main employment sites allocated in the plan with the following description:

South Station Place (approximately 43 ha gross) – this land is located adjacent to j21 of the M6 and south of Birchwood Railway Station and provides industrial and distribution uses, and a business hub.

Para. 3.3.25 should be revised to remove the reference to Land to the East of M6 junction 21. The land is now being promoted together and a new long term and defensible boundary for the green belt has been defined.

Para. 3.3.26 raised the question of a review into Warrington's employment land uses before the end of the plan period. This should be amended to make reference to providing sufficient land to cater for such a review.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

An additional bullet point should be added to Paragraph 3.3.23 to state:

South Station Place (approximately 43 ha gross) – this land is located adjacent to j21 of the M6 and south of Birchwood Railway Station and provide industrial, distribution uses and a business hub.

Para. 3.3.25 should be revised to remove the reference to Land to the East of M6 junction 21. Para. 3.3.26 should be amended to make reference to providing sufficient land to cater for a future employment land review.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Vision and Spatial Strategy.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

### PART B - Representation Form 10

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Vision and Spatial Strategy

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Paragraphs 3.4.1-3.4.16

3. Do you consider the Draft Local Plan to be: Please select one option in each row.						
	Yes	No				
Legally Compliant	х					
Sound		х				
Compliant with the Duty to Co-operate	х					

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Whilst the general exceptional circumstances set out in para. 3.4.1-3.4.9 are broadly supported in terms of there being exceptional circumstances for green belt release in Warrington, there should be an additional bullet for para. 3.4.10 which states:

Land at South Station Place will provide a new access to Birchwood Railway Station with associated station improvements including park and ride and turnback facilities. The land will also make a significant contribution to the employment needs of the Borough without harming the wider purposes of the Warrington green belt.

The argument about not meeting Warrington's full development needs and the implications for the Duty to Co-operate set out in para. 3.4.11 to 3.4.16 are supported.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

There should be an additional bullet for para. 3.4.10 which states:

Land at South Station Place will provide a new access to Birchwood Railway Station with associated station improvements including park and ride and turnback facilities. The land will also make a significant contribution to the employment needs of the Borough without harming the wider purposes of the Warrington green belt.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

## If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. Employment use is a key element of the plan and it is essential to examine in depth the justification for the green belt release and allocation of land south of Birchwood railway station for station improvements and employment uses.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Vision and Spatial Strategy.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 11

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Objective 1

2. What does your comment relate to? Please select one option.

None of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Box ref. Objective W1

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	Х	
Sound	Х	
Compliant with the Duty to Co-operate	Х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Not applicable on this matter.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

The objective of supporting Warrington's ongoing economic success is supported but it is essential that any need for employment land is met by genuinely deliverable sites.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

None

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

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If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Objective 1.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 12

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

DEV4 Economic Growth and Development

2. What does your comment relate to? Please select one option.

A specific policy sub-number (s)

## If a paragraph or policy sub-number then please use the box below to list. (For example - Policy **MD2.1 part 3 or paragraph 10.2.13 etc as applicable).** Policy DEV4 Point 4 and Point 11.

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Legally Compliant X

Sound X

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

This policy is strongly objected to as it fails to allocate land at South Station Place, Birchwood for Employment development.

The identification of only two substantial allocations for employment development is of grave concern as any issues in respect to delivery will result in a major shortfall of employment land within the plan period. As such an additional site should be allocated which can be brought forward in the early years of the plan period. There is already a slight shortfall of 8ha in the land allocated for employment uses and such delays would only exacerbate the situation.

As such there should be an additional site allocated under point 4 of the policy to say: c) South Station Place - approximately 43 ha

In addition, there should be an additional line under point 11 to say: f. South Station Place

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

There should be an additional site allocated under point 4 of the policy to say: c) South Station Place - approximately 43 ha

In addition, there should be an additional line under point 11 to say: f. South Station Place

# 7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

# If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The proposed allocation of this land to support the employment needs of the Borough needs to be discussed in detail at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for DEV4 Economic Growth and Development.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 13

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Objective 1

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy **MD2.1** part 3 or paragraph 10.2.13 etc as applicable). Paragraphs 4.2.18-4.2.20

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	Х	
Sound		х
Compliant with the Duty to Co-operate	х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Paras. 4.2.18-4.2.20 should make reference to the allocation of land at South Station Place for employment and other uses, specifically as an extra bullet under para. 4.2.18 and with a consequential adjustment to para. 4.2.19 in order to accommodate the proposals set out in other representations.

The reliance set out in para. 4.2.20 for other sources of employment land is unrealistic and should not be relied upon.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Paras. 4.2.18-4.2.20 should be revised to make reference to the allocation of land at South Station Place for employment and other uses, specifically as an extra bullet under para. 4.2.18 and with a consequential adjustment to para. 4.2.19.

Para. 4.2.20 should be deleted.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The need for additional employment land is paramount to the local plan and needs to be discussed at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

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### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Objective 1.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 14

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Objective 1

2. What does your comment relate to? Please select one option.

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Paragraph 4.2.22

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Legally Compliant X

Sound X

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Para. 4.2.22 refers to a review of Warrington's employment land supply but states elsewhere that the changes to the green belt boundary are long term and there is no requirement for safeguarded land to be provided. Indeed, there are no further changes to the green belt anticipated prior to 2050. These two approaches are contradictory in that if the review finds there is a need for additional employment land there will be no land available. Such provision should be made as part of the preparation of this local plan.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Additional provision of employment land should be incorporated within the current local plan to include the land proposed at South Station Place which is the subject of other representations to this plan.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The implications of allocating insufficient employment land are sever and require detailed discussion at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

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### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Objective 1.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## **PART B - Representation Form 15**

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

GB1 Warrington's Green Belt

2. What does your comment relate to? Please select one option.

A specific policy sub-number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Policy GB1 Parts 1 and 3

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	Х	
Sound		Х
Compliant with the Duty to Co-operate	Х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Part 1 of Policy refers to no further changes to the green belt prior to 2050. This is contradictory to the proposal for a review of Employment Land Requirements prior to the end of the plan period [which is in 2038]. If this review finds that there is insufficient Employment Land available, the rigid approach to the green belt taken now will mean that there will be no opportunity to identify additional land for release from the green belt at that time.

Part 3 of the policy identifies those parcels of land which are to be removed from the green belt. To this list should be added:

K. Land at South Station Place

There is also concern about the green belt impacts of removing

b. South East Warrington Employment Area from the green belt.

This land performs a number of green belt functions and its removal would be harmful to the overall character and openness of the Warrington green belt. It is poorly related to existing settlement boundaries and there are doubts about whether it is an appropriate parcel of land to be considered for green belt removal and whether it would be deliverable within the plan period given the likely requirement for major highway improvements.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

To Part 3 should be added:

K. Land at South Station Place

In addition, reliance should not be given to the whole of b. South East Warrington Employment Area coming forward.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The future of the Warrington green belt is one of the most important aspects of the plan and those sites identified for release and those sites with potential such as the land south of Birchwood station need to be discussed in depth at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for GB1 Warrington's Green Belt.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 16

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Objective 2

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Paragraph 5.1.19

3. Do you consider the Draft Local Plan to be: Please select one option in each row.				
	Yes	Νο		
Legally Compliant	х			
Sound		х		
Compliant with the Duty to Co-operate	Х			

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Policy GB1 refers to no further changes to the green belt prior to 2050. This is contradictory to the proposal for a review of Employment Land Requirements prior to the end of the plan period [which is in 2038]. If this review finds that there is insufficient Employment Land available, the rigid approach to the green belt taken now will mean that there will be no opportunity to identify additional land for release from the green belt at that time. Paragraph 5.1.19 should be modified to accord with the requisite changes to Policy GB1.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Paragraph 5.1.19 should be modified to accord with the changes to Policy GB1 to ensure that there is adequate employment land for the current and future needs of Warrington Borough.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

# If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The long term implications for the Warrington green belt are significant and need to be considered at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

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**Comments/file description** South Station Place Framework Document and Appendices

You have just completed a Representation Form for Objective 2.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 17

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

INF1 Sustainable Travel and Transport

2. What does your comment relate to? Please select one option.

A specific policy sub-number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Policy INF1 section 3

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Х

Legally Compliant X

Sound

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Section 3 of Policy INF1 should include reference to the proposed improvements to Birchwood Station to include the provision of a new southern access, park and ride facilities, enhancements to the station and the provision of land for turnbacks.

It should have the following point added:

h. Opening of a southern access to Birchwood Railway Station to include a new park and ride, station improvements and provision of turnbacks to improve services on the CLC line.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Policy INF 1, Part 3 should have the following point added:

h. Opening of a southern access to Birchwood Railway Station to include a new park and ride, station improvements and provision of turnbacks to improve services on the CLC line.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The opportunities for enhancements and the implications for other elements of the plan are essential to the overall success and should be discussed at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for INF1 Sustainable Travel and Transport.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## **PART B - Representation Form 18**

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

INF2 Transport Safeguarding

2. What does your comment relate to? Please select one option.

A specific policy sub-number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy **MD2.1 part 3 or paragraph 10.2.13 etc as applicable).** Policy INF1 Parts 1 and 2

3. Do you consider the Draft Local Plan to be: Please select one option in each row.		
Ŷ	(es	No
Legally Compliant	Х	
Sound		Х
Compliant with the Duty to Co-operate	Х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Although the General Safeguarding Principles set out in the Local Transport Plan and noted in Part 1 are supported, including the provision of a park and ride and improvements at Birchwood station, part 2 of Policy INF2 should include safeguarding of the proposed improvements to ensure that they are brought into fruition, through the addition of the following point:

e. Provision of a new southern access, park and ride, station improvements and turnback facilities at Birchwood station.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Policy INF2 Part 2 should have the following point added:

e. Provision of a new southern access, park and ride, station improvements and turnback facilities at Birchwood station

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

**Comments/file description** South Station Place Framework Document and Appendices You have just completed a Representation Form for INF2 Transport Safeguarding.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 19

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

DC3 Green Infrastructure

2. What does your comment relate to? Please select one option.

A specific policy sub-number (s)

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Policy DC3 Point 3

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Legally Compliant X

Sound X

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Not applicable on this particular point.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

The identification of Greater Manchester Wetlands Nature Improvement Area is appropriate and reference to this is supported.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

None in respect to this point.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for DC3 Green Infrastructure.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

## PART B - Representation Form 20

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

DC6 Quality of Place

2. What does your comment relate to? Please select one option.

None of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Policy DC6 3. Do you consider the Draft Local Plan to be: Please select one option in each row.

YesNoLegally CompliantXSoundXCompliant with the Duty to Co-operateX

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Not applicable on this particular point.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

We support the need for good design to be at the core of all development proposals.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

None in respect to this particular point.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

#### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for DC6 Quality of Place.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

#### PART B - Representation Form 21

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

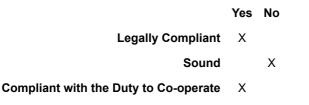
ENV2 Flood Risk and Water Management

2. What does your comment relate to? Please select one option.

None of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Policy ENV2 in general

3. Do you consider the Draft Local Plan to be: Please select one option in each row.



4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Policy ENV2 sets out the Council's approach to Flood Risk and Water Management but the policy is reliant upon up to date information. The EA has recently made substantial amendments to the online Flood Map but there remains a number of inconsistencies and it is essential that the Council works closely with the EA to ensure that site allocations and decision making are based upon accurate and up to date information.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Policy ENV2 and the Local Plan as a whole should ensure it is based upon the most up to date and accurate flood zone information.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

### If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. An up to date flood map is essential to plan future development and the evidence should be tested at examination to ensure this is the case.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

#### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for ENV2 Flood Risk and Water Management.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

#### PART B - Representation Form 22

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

ENV3 Safeguarding of Minerals Resources

2. What does your comment relate to? Please select one option.

None of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Policy ENV3 as a whole.

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	Х	
Sound		х
Compliant with the Duty to Co-operate	Х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

A number of the sites allocated for green belt release and allocation for development are located within areas where there is some evidence of mineral resources being present. However, the benefits of bringing the sites forward for development clearly outweigh the presence of any such minerals and the policy should therefore be revised to make it clear that where the benefits of development outweigh the benefits of extracting the mineral resource, priority will be given to the beneficial development.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The policy should be revised to state that where the benefits of development outweigh the benefits of extracting a mineral resource, priority will be given to the beneficial development.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

### If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The issue of mineral reserves should be considered to ensure clarity and consistency.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

#### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for ENV3 Safeguarding of Minerals Resources.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

#### **PART B - Representation Form 23**

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Objective 6

2. What does your comment relate to? Please select one option.

None of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Figure 16 of the Local Plan

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes	No
-----	----

#### Legally Compliant X

Sound X

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Figure 16 does not provide an up to date and accurate portrayal of the distribution of peat within the Borough particularly to the east of the M6 corridor. Much of the peat in this area was removed during the second world war to be used as fuel and the plan should be updated to reflect the current position.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Figure 16 should be revised to more closely reflect the distribution of peat east of Warrington.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

### If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. The distribution of peat needs to be based upon accurate information and should be considered at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

#### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Objective 6.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

#### PART B - Representation Form 24

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

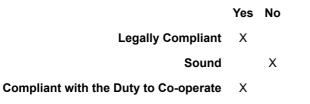
ENV7 Renewable and Low Carbon Energy Development

2. What does your comment relate to? Please select one option.

None of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Policy ENV7 as a whole.

3. Do you consider the Draft Local Plan to be: Please select one option in each row.



4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Policy ENV7 sets out the benefits and appropriateness of low carbon development. This is supported although there may be an opportunity to extend this further to provide stronger support for net carbon zero development

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The policy should include reference to support for net carbon zero development.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

### If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the need for improvements and additional access to Birchwood Station which need to be considered in depth at the oral examination. Opportunities for net carbon zero development all relate to the potential station improvements and need to be considered as a whole at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

File: South Station Place Framework Document Appendices 1A of 2.png File: South Station Place Framework Document Appendices 2A of 2.pdf

#### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for ENV7 Renewable and Low Carbon Energy Development.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

#### **PART B - Representation Form 25**

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Plan as a whole

2. What does your comment relate to? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Chapter 10 as whole

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	Х	
Sound		Х
Compliant with the Duty to Co-operate	Х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Chapter 10 – Site Allocations fails to allocate land for release from the green belt and development of a new Net Carbon Zero Public Transport Led Community and Employment Hub at South Station Place, Birchwood.

The site provides a unique opportunity to open up a new southern access to Birchwood railway station which would allow for station improvements, the provision of a park and ride and community facilities, and land for turnbacks for the CLC line.

The provision of a link road to the station would open up the land for the provision of an employment led scheme for industrial uses and logistics, alongside a more flexible business hub.

The development would also provide a small number of live work units in replacement of existing dwellings and the creation of large areas of public open space and nature conservation facilities which will result in biodiversity net gain whilst ensuring the protection and improvement of the adjacent local wildlife and other sites.

Alongside the exceptional circumstances that have been identified by Warrington Council as whole the unique opportunity to open up the southern access to Birchwood station alongside the new facilities proposed would increase the capacity of the CLC line and reduce overall road traffic, whilst the provision of additional employment land and nature conservation benefits would be a significantly positive impact of the proposed development.

A full description of the proposal and the exceptional circumstances which justify the release of this site are set out in the attached Framework Document.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Land at South Station Place should be identified for green belt release and allocation for a mixed use development to consist of a new Net Carbon Zero Public Transport Led Community and Employment Hub.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

### If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The benefits of developing South Station Place and the exceptional circumstances that exist are complex and need to be considered in depth at the oral examination. The development will make a major contribution to the employment land supply of Warrington in a sustainable manner associated with major public transport improvements. It is essential that it is considered in depth at the examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

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If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

File: South Station Place Framework Document.pdf File: South Station Place Framework Document Appendices 2 of 2.pdf

#### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

#### PART B - Representation Form 26

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

MD3 Fiddlers Ferry

2. What does your comment relate to? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable). Policy MD3 and paragraphs 10.3.1 to 10.3.14

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	Х	
Sound		Х
Compliant with the Duty to Co-operate	х	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

The allocation of land at Fiddler's Ferry for Employment Uses is appropriate in principle but there are significant concerns about the deliverability, viability and timescale of the development proposed such that it would not be appropriate to rely on this site to make a tangible contribution towards employment land supply within the Borough during the plan period.

It is therefore necessary to identify other land as a source of employment land supply such as the land at South Station Place.

Fiddler's Ferry can then come into play as part of the Employment Land Review referred to elsewhere in the plan.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The employment land allocation at Fiddler's Ferry should be reviewed and a more realistic contribution put forward as part of the current Local Plan with the remainder identified for longer term needs as is likely to come from the Employment Land Review.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

### If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues relating to Fiddler's Ferry which are complex and need to be considered in depth at the oral examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

#### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for MD3 Fiddlers Ferry.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (Part B)

#### PART B - Representation Form 27

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

MD6 South East Warrington Employment Area

2. What does your comment relate to? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy **MD2.1** part 3 or paragraph 10.2.13 etc as applicable). Policy MD6 and paragraphs 10.6.1 to 10.6.10.

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

Yes No

Legally Compliant X

Sound X

Compliant with the Duty to Co-operate X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

The extent of the proposed removal of land at South East Warrington and its allocation for employment development conflicts with national planning guidance for green belts. The land does not relate to any existing settlement boundary and only has a slight relationship with a small area that lies outside of the existing green belt. As such the removal of the whole site from the green belt will conflict with the purposes of green belt and be detrimental to the essential characteristics of the green belt which is its openness.

The scale of the development and the extent of infrastructure required to support it also bring the viability and deliverability of the site within the plan period into question with the result that, particularly given similar concerns at Fiddlers's Ferry, there is a grave concern that Warrington will fail to deliver the additional employment land needed to maintain its economic growth.

It is therefore necessary to allocate additional land at South Station Place to address this concern.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

On this matter there would not appear to be any conflict with legal compliance or the duty to co-operate.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The proposed removal from the green belt and allocation of land under Policy MD6 should be reviewed and deleted unless it can be shown that the green belt harm is limited and the scheme is deliverable within the local plan period, taking into account infrastructure requirements.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

### If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are a number of issues all relating to the green belt and deliverability of this site which need to be considered in depth at the oral examination.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

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If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

#### Comments/file description

South Station Place Framework Document and Appendices

You have just completed a Representation Form for MD6 South East Warrington Employment Area

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response (Part C)

#### Part C - About you

Q1. Age. Please select one option.

45-54

Q2. Gender. Please select one option.

Male

Q3. Is your gender identity the same as your sex registered at birth? Please select one option.

Yes

Q4. What is your relationship status? Please select one option.

Married

Q5. How would you describe your ethnic origin? Please select one option.

White

White ethnic group of background. Select one option.

English, Welsh, Scottish, Northern Irish or British

Q6. How would you describe yourself? Please select one option.

Straight/Heterosexual

Q7. Your religion or belief. Which group below do you most identify with? Please select one option.

Christian (Church of England, Catholic, Protestant and all other Christian denominations)

Q8. Are you currently pregnant or have you been pregnant in the last year? Please select one option.

No

Q9. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? Please select one option.

No

# South Station Place

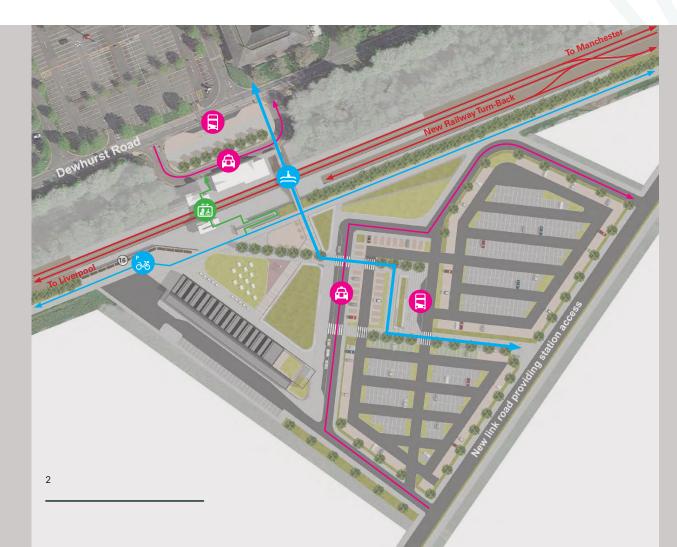
PATRICK PROPERTIES

A New Net Carbon Zero Public Transport-Led Community and Employment Hub

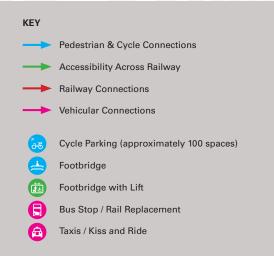
DAYCARE NURSERY

#### SOUTH STATION PLACE

"If we want to encourage people into public transport, then we have to make public transport more easily accessible, user friendly and save commuters time and money"



$$S+ O+P=$$



SOUTH STATION PLACE

QUALITY ASSURANCE

Issued by:



www.cassidyashton.co.uk

## Title: Framework Document Submission Version Date: November 2021

### Contents

1.0 Vision and Key Development Objectives	8.0 Employment
2.0 Introduction	<ul> <li>9.0 Nature Conservation and Open Space</li> </ul>
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5.0 Planning Context	12.0 Construction Charter
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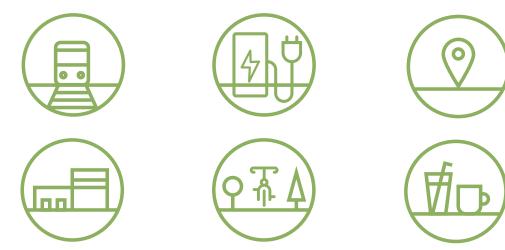
## 1.0 Vision and Key Development Objectives

"To create a high-quality, sustainable development that opens up a new access and facilities at Birchwood Station whilst promoting an attractive, healthy and environmentally-conscious development, which promotes connectivity within and throughout the local and wider area, and contributes significantly to the local economy."



SOUTH STATION PLACE

## Vision and Key Development Objectives

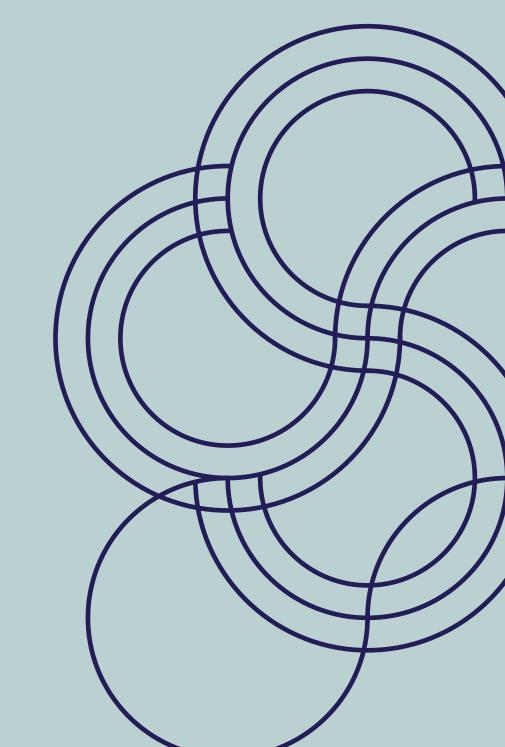


- To deliver key strategic public transport Infrastructure which is aligned with the aspirations of Network Rail, Warrington Borough Council and the wider regional and local transport sector.
- To create a new southern access to Birchwood Station, allowing for future expansion, an increase in usability and improved customer satisfaction.
- To create an opportunity for rail infrastructure enhancements and support the CLC line with rail turn backs and bay platforms.

- To create a new park and ride that has opportunity to grow to suit future demands.
- To provide enhanced station facilities and public realm areas, supporting the existing business community and local residents with investment into public transport.
- To meet the aspirations of 'levelling up' through considerable private investment in public infrastructure.
- To create and enhance pedestrian and cycle links.



## 2.0 Introduction



### Introduction

Birchwood Railway Station lies in a key location on the Liverpool-Warrington-Manchester railway line but suffers from poor pedestrian and vehicular accessibility.

Although there is a large shopper's car park at Birchwood Shopping Centre, there is only limited all day parking, whilst the presence of the Centre itself, together with the railway station and business park, means that at peak times congestion is at such a high level that it deters potential travellers from accessing the rail network. Whilst it is recognised that the COVID-19 pandemic has impacted traffic levels, this congestion issue is expected to return to precovid levels within the 3-5 years these proposals would be delivered.

There is a lack of available land north of the railway station and railway line to address these issues, as much of the adjacent land is already in use by Birchwood Shopping Centre and there is minimal parking at the station itself. The only realistic solution to these issues is to open up the southern approach and provide new facilities on the southern side of the station. Alongside measures to increase the capacity of the line, this will create the opportunity for a large increase in travellers to and from Birchwood whilst reducing existing traffic congestion at the station.

Patrick Properties are therefore delighted to present their proposals to open up the southern approach to Birchwood Railway Station as part of a mixed use, public transport-led development proposal, to be known as South Station Place [SSP], which is being submitted to Warrington Borough Council as part of their Local Plan process. With a focus on investment in public transport, SSP are working with Network Rail and operator Northern Rail to enhance the CLC corridor, which will represent an urban extension at the gateway to Warrington's largest employment and central innovation area.

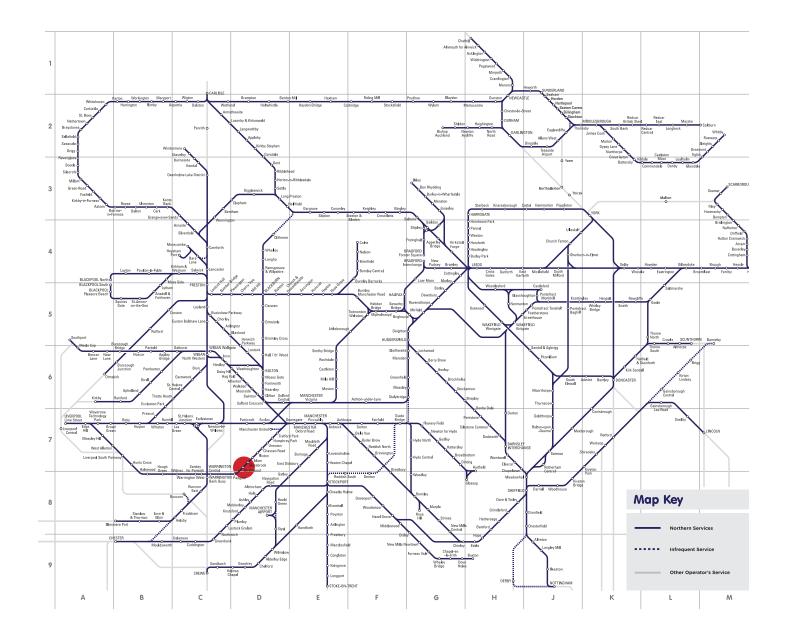
The purpose of this document is to outline the proposed development, demonstrating the need for the improvements to Birchwood Railway Station and how this would form an integral element of a wider sustainable urban extension which would deliver much needed employment opportunities within a sustainable net carbon neutral development.

The document will demonstrate the opportunities afforded by opening up the southern access to create a railway station that is fit for the 21st century with an extensive park and ride facility, alongside a community hub with local shops and services. The new access opportunities, to ensure that the existing highway network can accommodate the development, are identified, with new employment also an integral part of the scheme. These proposals will be set within a green landscape infrastructure to ensure that not only will the scheme be net carbon neutral but it will also make a considerable contribution to biodiversity net gain and crucially protect and enhance the adjacent mossland.



### Introduction

Birchwood Railway Station lies in a key location on the Liverpool-Warrington-Manchester railway line but suffers from poor pedestrian and vehicular accessibility.

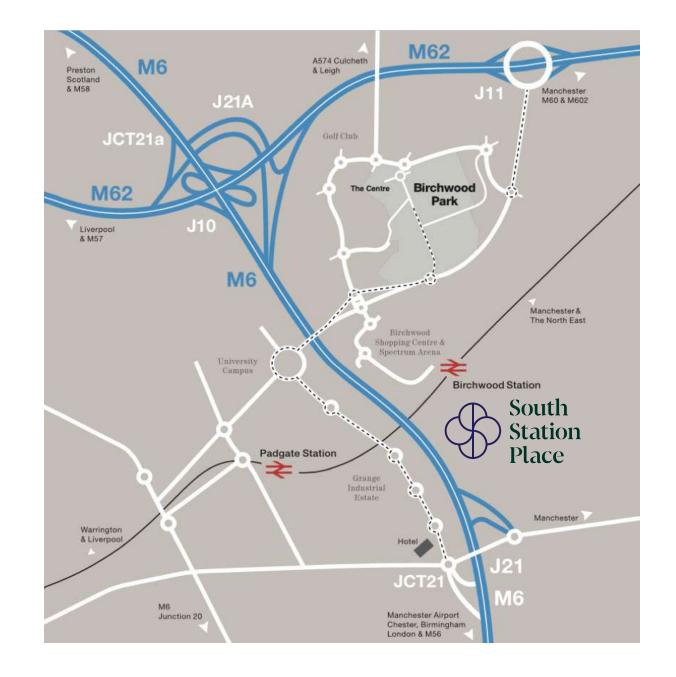


### Introduction

The document concludes with a proposed masterplan approach to the development which is based upon detailed studies into accessibility, landscape, ecology, flood risk, hydrology, ground conditions and other technical concerns such that it is demonstrated that the proposal is genuinely deliverable and can make a tangible contribution to the development needs of Warrington, alongside providing considerable benefits to the public transport infrastructure of the Borough and beyond.

It is acknowledged that the site currently lies within the Warrington Green Belt, but it is considered that the development would not conflict with the key purposes of the green belt as it relates to Warrington but also that the opportunities afforded provide the exceptional circumstances necessary to justify releasing the land from the green belt at this time.

South Station Place will provide exceptional and unique benefits that cannot be provided elsewhere within Warrington and the site should be allocated within the emerging Warrington Local Plan to assist the Borough in meeting its development targets and producing a Local Plan that can be regarded as sound and in full compliance with legal requirements.



## 3.0 Project Team and Stakeholders

### **Project Team**



Patrick Properties are working with a group of landowners to develop the site collectively. Currently two opportunities are being promoted and this document therefore presents two Masterplan options in line with each eventuality.

The Latium Enterprises Group ("LE") controls a number of companies operating in the United Kingdom and the United States in diverse business sectors, all of which are either totally or materially controlled by Brian Kennedy & Family, working with specialised management teams. Latium launched its first company over 30 years ago, and now controls eight separate companies from its UK headquarters in Manchester, England and from New York in the USA. The group has a combined annual turnover of £300 million and employs over 3,500 staff. Business sectors have included; Renewable Energy Development ownership and operation, Industrial and Commercial property investment and development, strategic land and sustainable development, Plastic Extrusion Manufacturing, Home Improvements and outdoor living, modern methods of construction, conservatory roof manufacturing, Glass Sealed Unit Manufacturing, Software and technology businesses, Feature Film Production, Professional Sports Team Ownership and E-commerce. The group operates with almost zero debt from third parties and is fully self-funding.

Patrick Properties is part of the family Latium group and has been established for over 20 years having developed over 4 million sq. ft. of commercial space within the United Kingdom. The business prides itself on its family ethos and principle of putting its customers first. With a real focus on sustainability and the environment. All new developments are delivered to BREEAM standards and include an array of additional benefits such as solar and EV charging. Building from the ground up, Patrick Properties sees each development through from inception of an idea, to creation of a world class product. Creating places is a key driver in breathing life into new communities by creating homes, jobs and community infrastructure. The group has a diverse range of investments and ownership and with operations which have active requirements for new business and employment space along the M6 corridor for both start-up and well-established businesses, ranging from 10,000 sg. ft. - 400,000 sg. ft. and including a need for distribution and manufacturing floorspace.





## Deliverability Patrick Properties – High quality sustainable developments



### **Stakeholders**

JORTHERN

# NetworkRail

Network Rail have been fully engaged and consulted throughout the evolution of these proposals and are key partners in delivering South Station Place.

Northern Rail have been fully consulted

and greater accessibility to additional

service operations.

and whole heartedly support these proposals which generate improvements to passenger experience through improved facilities



national

The Highways Agency have been consulted and support the principle of this project.



Transport for Greater Manchester have been consulted on and whole heartedly support these proposals.



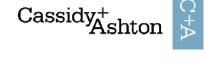
Merseytravel have been consulted on and whole heartedly support these proposals.



Warrington Borough Council have been engaged with throughout the preparation of these proposals and see South Station Place as a prosperous opportunity for the Borough and its transport infrastructure.

16















STRZALA architects









## 4.0 Site Context and Characteristics

SOUTH STATION PLACE

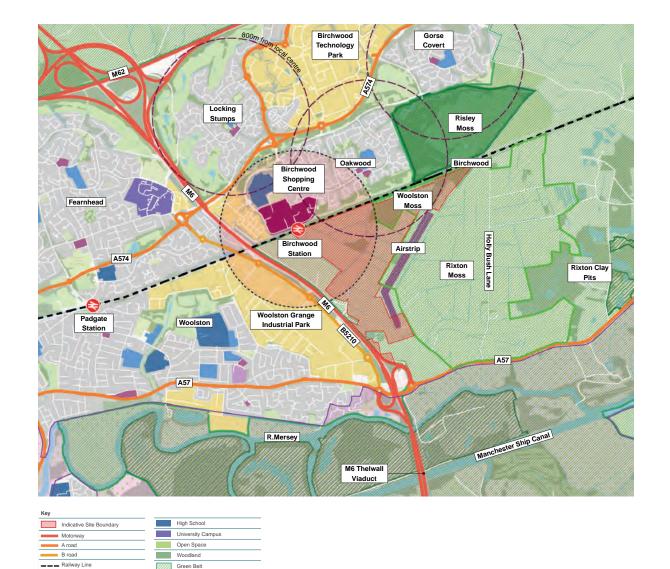
# Site Location

### Site Location

The representation site consists of land largely enclosed by the Manchester-Warrington-Liverpool railway line (to the north), the M6 (to the west) and the A57 Manchester Road (to the south).

These boundaries, together with Birchwood to the north and Woolston to the west, provide a substantial degree of containment with dense urban built development on two of the site's three sides.

The town centre of Birchwood and Birchwood Railway Station and Shopping Centre lie immediately to the north, whilst Warrington Town Centre lies 4.7km to the west. Birchwood lies almost halfway between Liverpool and Manchester. Birchwood Technology Park lies to the northeast, whilst Woolston Grange Industrial Park lies to the west. Given the close proximity to a range of services and facilities, the site is considered to lie within a highly sustainable location.



District / Neighbourhood Centre

Employment / Industrial Area Primary School

Local Centre

Community Hub

SSSI

Local Nature Reserve

LP CS6 Strategic Green Link

## Gateway to Birchwood Park and Science Corridor





# Site Description & Accessibility

The total land area available for which this document is concerned totals well over 100 ha, consisting largely of monotonous agricultural land with scattered dwellings and a light airfield. The land is generally fairly level with a series of ditches used to drain the land in the past.

#### Accessibility

Despite being located centrally between Liverpool and Manchester along the Cheshire Lines Railway, the operational capacity of Birchwood Railway Station is restricted. However, the station is also well served by bus routes, with frequent services to Warrington, Gorse Covert, Oakwood, Leigh and Callands.

Within the current Local Plan Policies Map, the South Station Place land area is designated green belt, which surrounds the settlements of Birchwood and Warrington. However, given the very dense urban development to two of its three sides, this provides an urban fringe environment and creates a unique opportunity for an urban extension whilst respecting the existing urban form.



### Site Boundaries

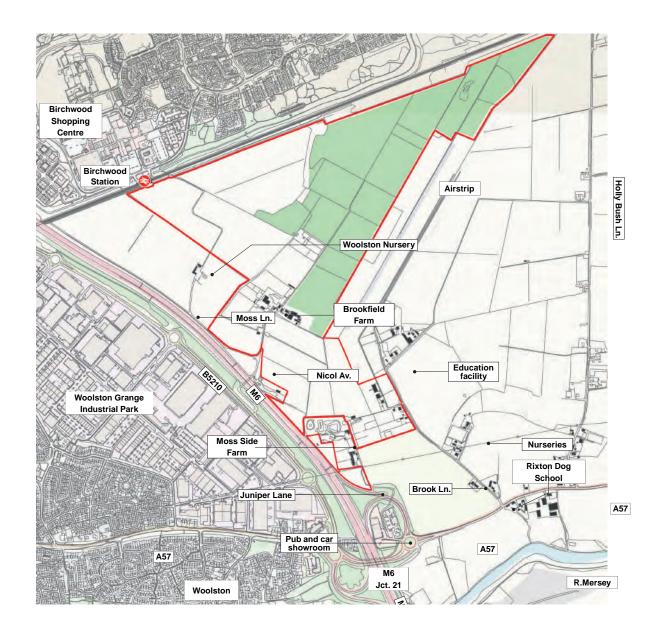
The SSP site has very strong, definable boundaries – the railway line to the north, the M6 Motorway the west, Birchwood Airport / Airstrip to the east and the A57 / River Mersey to the south. The edges containing the development site are therefore logical revised Green Belt boundaries which strictly encapsulate the land area and therefore prevent any risk of urban sprawl.

The triangular nature of the site presents South Station Place as a logical urban extension 'infilling' the existing development line which borders two of its three triangular edges.

#### A Sustainable Urban Extension

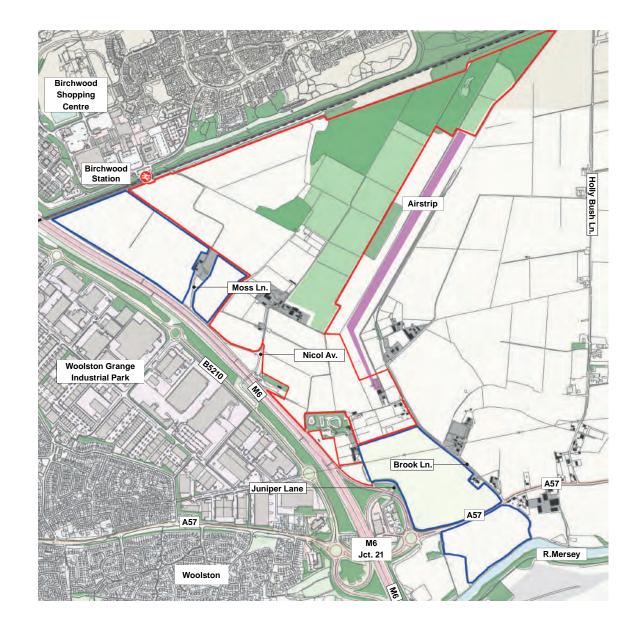
South Station Place is well connected to its adjoining urban area. In delivering a southern access to Birchwood Station the proposals seek to enhance the connectivity to neighbouring facilities.

Birchwood Park is located just 1 mile from the site, affording itself as an existing vibrant business park, which the SSP proposals seek to complement. The facilities across the wider area of Birchwood would be equally as accessible from the site, extending the southern aspect of the town and improving usability of its key services and amenities, in turn generating further urban economic growth.



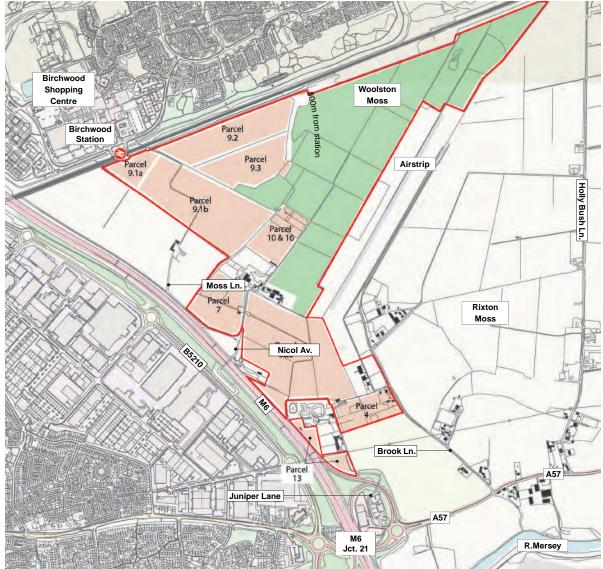
### Site Boundaries

In addition to land controlled by Patrick Properties, the land outlined in blue is controlled by others and can be brought forward for development. This site is deliverable with or without the neighbouring land.



### Schedule of land parcels

Parcel	Gross area (ha)	Gross area (acres)
4	2.7	6.67
5 & 6	10.93	27
7	2.56	6.32
9.1b	9.66	23.86
9.2	5.34	13.19
9.3	5.53	13.66
10	3.39	8.37
16	0.57	1.41
13	1.09	2.69
9.1a	1.7	4.2
Total	43.47	107.37



### Site History

The land to be known as South Station Place falls on the edge of a large area of former mossland which formed part of the original Risley Moss. According to T. Lloyd-Morgan, the land originally lay between two Danish settlements, namely Eric's Town [Rixton] and Wulfige's Town [Woolston]. Martinscroft became established as a small hamlet to the south of Woolston.

Historically, the wider local area was under the domain of the Culcheth family, when following the death of Gilbert de Culcheth in 1246, the estate was divided between his four daughters with the Risley area falling to Ellen who married into the de Hindley family and took the name Risley which was a small hamlet north of Woolston. The family held the land until 1736, after which it was sold and broken up a number of times.

Much of the land was subsequently drained and became some of the most productive agricultural land in the country. Land was also used for commercial peat cutting until 1928, whilst the army removed large areas of peat in the area now enclosed by the railway line and M6 motorway to be used as fuel during the Second World War. Drainage and construction works also took place in the mid to late 19th century to facilitate the building of a second Liverpool to Manchester railway line following the opening of the first in 1830. This second route opened in 1873 and is still in use today as part of the Cheshire Lines Committee route. This line forms the northern boundary of the promotion site.

In 1939, Risley Moss was acquired by the Government to build an Ordnance factory, reputedly as the frequent fogs would make the factory more difficult to spot for enemy aircraft. The factory was subsequently taken over by the Admiralty and then the Atomic Energy Authority before becoming vacant whereby it fell into disrepair. This land was subsequently promoted to be Birchwood New Town which eventually led to the creation of the Warrington and Runcorn New Town.

Birchwood and Woolston grew rapidly in the 1980s and 1990s and are now densely built up areas of residential, industrial and retail uses. Rixton in contrast has remained a small hamlet with almost no growth, whilst Martinscroft has been absorbed into the larger built up area of Woolston.





#### 1849

The 1849 [1st Edition] Ordnance Survey map shows an area of small farming units, matching the tithe map of 1840 surrounding Woolston Moss which forms part of the larger Risley Moss. Other than Manchester Road and Brook Lane there is little in the way of a road network.

#### 1896

By 1896 the distinctive feature of the Cheshire Lines railway had cut through Risley Moss with subsequent land drainage leading to the creation of new and amalgamation of former farm fields to create a more agricultural landscape. The remaining area of mossland within the site, remains largely untouched to the present day other than a short stretch to the west of what is today the airfield. The road network however, remained simple.

#### 1908

By 1908 the agricultural landscape that is there today had largely been completed with the remaining moss sitting in the north east corner of the site and the current field patterns having been created by this time.

#### 1929

Little changed in the period to 1929 other than land in the vicinity of the modern airfield was drained and changed to agricultural use.

#### 1955

By 1955 little further change had taken place on the site itself but the lack of mapping to the north would seem to indicate the presence of the Ordnance factory. Additional sidings alongside the railway had also been created.

#### 1967

The two most substantial changes by 1967 were the construction of the M6 motorway and the revealing of the Ordnance factory to the north. The site itself however experienced little further change.

#### 1977

The Ordnance factory remained in 1977 although by now plans were well advanced for Birchwood and subsequently Warrington New Town. Again, little changed on the site itself. To the west, development was beginning to grow around Woolston.

#### 1991

A significant growth spurt took place in the period to 1991 with Woolston extending its residential development and adding a large industrial estate known as the Grange. Birchwood by now was well established with Birchwood Centre alongside the new railway station and the Oakwood residential district largely complete. To the north east of the site, Risley Moss Country Park was welcoming visitors.

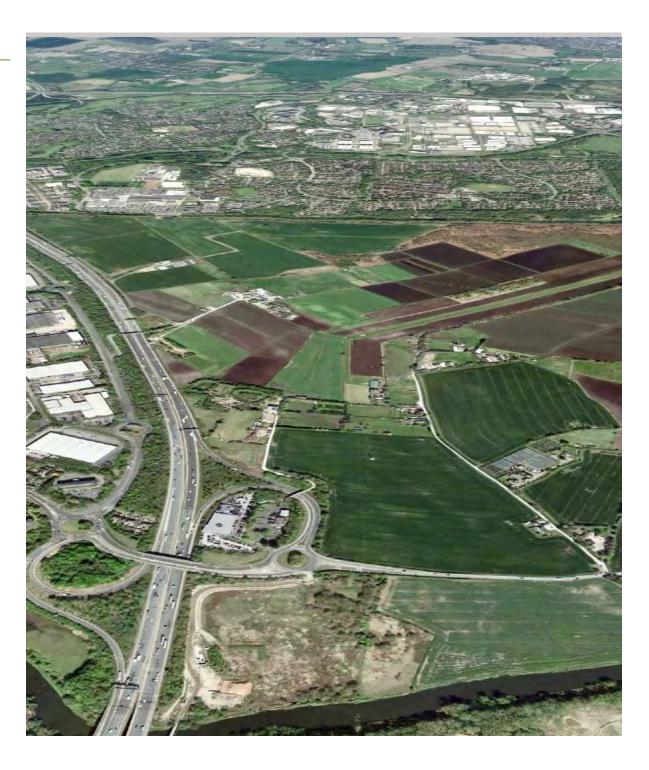


SOUTH STATION PLACE

### **Present Day**

Although the site area itself remains fairly undeveloped, the surrounding area has evolved significantly over time. As indicated by the modern day aerial view, the adjoining land is therefore comprised of dense urban development, to which South Station Place would feature as a natural urban extension, infilling the land between Birchwood and Woolston.

It has always been an aspiration to deliver a second access to Birchwood Station. South Station Place seeks to facilitate this, by providing this access. The new link road intends to alleviate traffic congestion at the station, enhancing its appeal, usability and service offering.



## 5.0 Planning Context

SOUTH STATION PLACE

### Planning Context

The Development Plan for Warrington is presently comprised of the Warrington Local Plan Core Strategy to 2027, which was adopted in 2014.

Work on a replacement plan began in 2016 and a submission plan was consulted upon in 2019. Due to the extent of responses received and the outcome of the Housing Delivery Test - an annual review of housing delivery - that version of the local plan was abandoned and the new submission draft commenced consultation in October 2021. It is this plan that this document is submitted in response to.

A full set of representations to the submission draft will be made separately and this document concentrates upon the exceptional circumstances that apply to the land at South Station Place which justify it being allocated for a public transport led mixed-use and sustainable development.

#### **Existing Status**

The site is shown in the adopted Warrington Local Plan Core Strategy as lying within the green belt, with existing employment and residential areas to the north and west. Birchwood District Centre lies immediately north of the railway station and Rixton Moss local wildlife site lies to the east but outside of the area being proposed for development.



### Submission Draft Local Plan

The Submission Draft Local Plan acknowledges the need for land to be released from the Warrington Green Belt to meet the future development needs of the Borough and follows national planning guidance in providing justification for this.

The National Planning Policy Framework [NPPF] sets out five purposes of green belts [para. 138]:

- 1. to check the unrestricted sprawl of large built-up areas;
- 2. to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- 4. to preserve the setting and special character of historic towns; and
- 5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 140 asserts that exceptional circumstances should and could support amendments to Green Belt boundaries, whilst Paragraph 142 goes on to define that sustainable patterns of development should be promoted when making any such changes to Green Belt boundaries, giving priority to land which is well served by public transport.

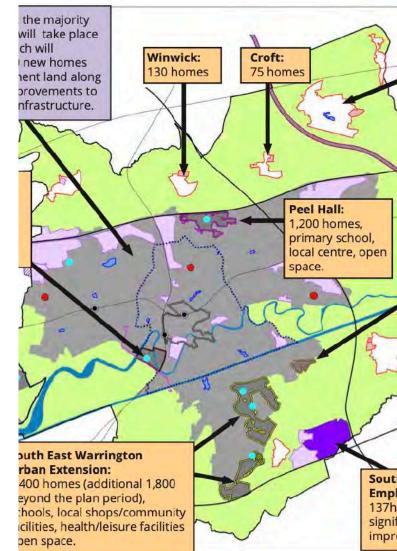
#### Green belt boundaries [para. 143] should:

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

#### The 2021 Submission Warrington Local Plan states that:

"3.4.1 The Council is able to fully evidence and justify the exceptional circumstances required for Green Belt release, in accordance with the NPPF.

3.4.2 In accordance with paragraph 141 of the NPPF the Council has examined fully all other reasonable options for meeting Warrington's identified need for development before concluding that exceptional circumstances exist to justify Green Belt release."



### Submission Draft Local Plan

#### It was also noted that:

"3.4.4 The Council recognises that some of these opportunities will fall outside of the Plan period. Together with the longer term delivery from the Plan's site allocations and other potential sites within the wider existing urban area, this negates the requirement to take any additional land out of the Green Belt as Safeguarded Land."

### Alternative locations outside of the Borough were also given consideration but:

"3.4.6 St Helens are making a contribution to meeting Warrington's employment land needs through the proposed western extension of the existing Omega development. This is demonstrated in the Council's Statement of Common Ground. It is also apparent that all of Warrington's neighbouring authorities are having to release Green Belt themselves to meet their own development needs."

### Reaching a conclusion on Green Belt release, the submission local plan states:

"3.4.7 The starting point for Warrington's exceptional circumstances is the requirement to ensure that sufficient land is provided to meet Warrington's development needs. The Plan's proposed housing requirement will ensure that issues of affordability are addressed and that sufficient homes are provided to support the planned level of economic growth, but this can only be achieved with the release of Green Belt. Similarly, if Warrington is to provide sufficient employment land to meet its future needs, then this can only be achieved with the release of Green Belt.

3.4.8 The exceptional circumstances are further justified through the spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.

3.4.9 This will ensure that the release of Green Belt land will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole."

The draft plan also provided what were regarded as exceptional circumstances for each area of Green Belt release. It is not the purpose of this document to critique other proposed green belt releases, but it is noted that the justification for the various sites included:

... a major proportion of Warrington's need for housing and employment land can be met sustainably through comprehensive planning and infrastructure delivery. The scale of the urban extension will also provide capacity for growth well beyond the Plan period, ensuring the permanence of the revised Green Belt boundaries.



### **Purposes of Green Belt**

The release of the land at SSP from the green belt would not compromise the five purposes of the green belt in Warrington and would also accord with the requirements of national planning guidance in respect to the establishment of a new, long term green belt boundary.

The nature of the site which is broadly triangular in shape and has existing development on two sides is such that the development will not appear as unrestricted sprawl or result in the merging of existing towns as the next settlement is a substantial distance away. The development will be well planned, mixed use and incorporate substantial areas of green space. As such it will not appear as an encroachment into the countryside and will relate well to the existing extent of development to the north and west.

Turning to the issue of preserving the setting of historic towns, it is not considered that this is a primary purpose of the Warrington green belt as the adjacent built-up areas are both relatively modern and the only heritage feature is a listed milestone to the southeast of the site. The historic heart of Warrington will not be affected by the proposed development.

Given the accepted exceptional circumstances for green belt release have been accepted by Warrington Council due to a lack of available land within the urban area, it is not considered that the release of the site will harm regeneration initiatives within the town.

#### **Green Belt Boundaries**

When making changes to the green belt it is essential that the guidance set out in the NPPF is adhered to.

The proposed development of SSP accords with the development strategy of the Local Plan in that it is a public transport-led sustainable mixed-use development in an accessible part of the Borough where development demands are high but existing opportunities are minimal.

There is no particular benefit in keeping the land open. It is visually dominated by the existing built up area on two sides which partly enclose it from the wider open countryside. It has no particular landscape or heritage value and its development would not compromise the overall character and purpose of the Warrington Green Belt.



### These reasons are all applicable to South Station Place but in addition, the specific exceptional circumstances include:

- The delivery of key public transport infrastructure through private sector investment
- The creation of new access to the south of Birchwood Railway Station
- The opportunity to enhance and upgrade Birchwood Railway Station to increase capacity, usage and customer satisfaction
- Aligns with rail and transport stakeholders aspirations, by facilitating enhancements along the CLC rail corridor. Not only benefiting Warrington but serving enhanced regional connectivity.
- The provision of a substantial park and ride scheme, with capacity for growth. This
  represents a significant opportunity to take cars off the road and encourage people onto
  public transport
- An improved gateway to Warrington major employment area and science corridor. The proposal serves the existing business community by delivering a significantly improved public transport infrastructure
- Assist carbon landscaping and carbon reduction
- The creation of a community hub with Doctors / Dentist and other community uses
- The provision of 1.6 million sq ft industrial floorspace
- The creation of an Employment Park/Business Hub to boost new business growth and support the opportunity for the creation of approximately 3,000 new jobs within the local economy once built
- · Safeguarding and enhancement of key designated Moss land and protected habitats
- Creation of new green links and ecological havens
- A logical extension to existing settlement is in a highly sustainable location
- Deliverable within the next 3 to 5 years

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### Submission Draft Local Plan

The draft plan also identifies the implications of not meeting Warrington's full development needs. These include:

- In the short term the Council considers that Warrington's economic strength and attractiveness will result in ongoing development pressure. This may initially be accommodated in the existing urban area through higher density development but these options still require Green Belt release.
- A lower level of development may reduce the ability of the Council to plan comprehensively for growth and as a result infrastructure delivery could be piecemeal and reactive.
- It is likely that there will be an absolute and proportionate increase in the number of people commuting into the Borough to work. The consequences from this are likely to include increasing congestion on Warrington's transport network and a risk of worsening air quality on some of the busier transport corridors where people live.
- If the Council does not release additional land for employment, then the Council is concerned that in the medium and longer term Warrington's status as a key driver of the North West economy will be threatened.
- As development land is used up, potential development and investment could be lost to other regions of the UK and potentially overseas. The Council's Economic Development Needs Assessment is clear that there is already suppressed demand for employment land.

There is clearly not only an overwhelming argument that exceptional circumstances for green belt release in Warrington do exist but that there are also exceptional circumstances to justify the release of the land at South Station Place, particularly in view of the unique nature of the railway led development that will come about as a result of the allocation of the land for a mixed use scheme.

Failure to allocate the land would potentially result in the Warrington Local Plan failing to deliver the full development needs of the Borough, thus making the Plan unsound.

# South Station Place

# South Station Place

### National Planning Policy Framework

There are a number of other policies in the NPPF which provide the framework for considering the merits of high quality, sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development, with the key purpose of the planning system seen as being to contribute to the achievement of sustainable development [para. 7]. There are three overarching objectives to sustainable development, which are interdependent and need to be pursued in mutually supportive ways; an economic objective, a social objective and an environmental objective [para. 8].

Paragraph 81 highlights that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.

Paragraph 82 goes on to state that planning policies and decisions should recognise and address the locational requirements of specific sectors highlighting preferences for suitably accessible locations.

Paragraph 92 requires planning decisions to aim to achieve healthy, inclusive and safe places, which; promote social interaction, are safe and accessible and enable and support healthy lifestyles.

Paragraph 105 supports development focused in sustainable locations, which reduce the need to travel and are well connected to key transport nodes.

Paragraph 112 requires developments to:

- Give priority first to pedestrian and cycle movements, both within the scheme and within neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport.
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive;
- Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations

Paragraph 122 asserts that planning policies and decisions need to reflect changes in demand for land, which should be informed by regular reviews of available land and allocated land.

SSP satisfies all of these requirements of the NPPF and will result in a high quality, accessible and sustainable development.



### Site Opportunities and Constraints

The site area has been subject to an extensive suite of surveys and analysis, which have identified a number of specific characteristics materialising as opportunities and constraints. Each of these have informed the design process, allowing the inclusion of appropriate enhancement and mitigation solutions. This evaluation exercise has then guided and will continue to guide the design evolution.

The technical characteristics of the site are set out in further detail in the supplementary Technical Appendices, however are summarised within Chapter 10 of this document.

#### **Opportunities:**

- There is a unique opportunity to open up access to the southern side of Birchwood Railway Station
- The development provides the opportunity for transport enhancements and other public infrastructure, including new footpaths and cycle links
- The site will be highly accessible from the M6 and from the railway network as well as from the local area through a network of existing and proposed cycle and footpaths
- The site is in close proximity to existing local facilities and services, including those within Birchwood District Centre
- The site is considered to be within a sustainable location
- The site provides the opportunity for environmental safeguarding and enhancement including peat restoration and protection of the adjacent mosslands
- The topography of the land is relatively flat and the area is readily available for development
- The development can provide net zero carbon live-work units

#### **Constraints:**

- The site is a greenfield site
- The site is allocated within the green belt under local planning policy
- Birchwood Airport and the Airstrip lay adjacent to the site
- There is a need to identify two access points to the site and the existing Nicol Avenue route into the site would require highway improvements
- There are potential issues with noise due to the proximity to the development will result in additional traffic movements at the M6 Junction 21
- The site is located adjacent to land identified as mossland and due regard should be given to this

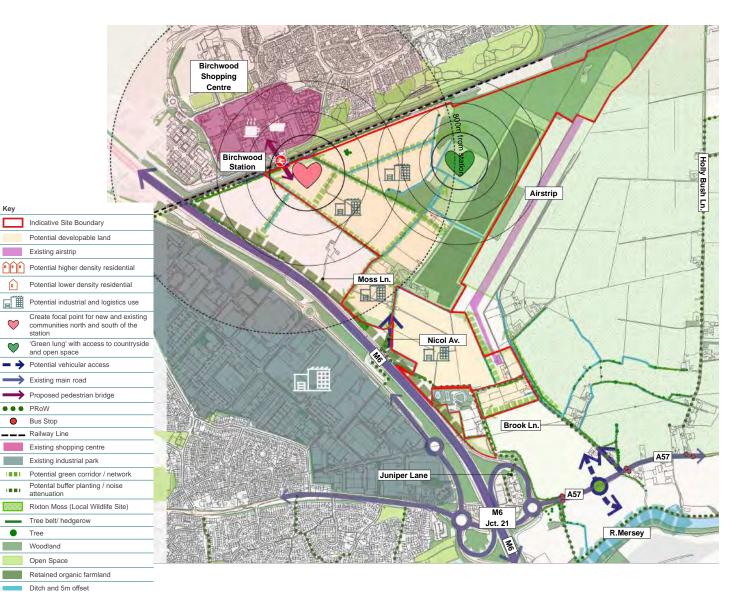
Both the opportunities and constraints have informed the proposed masterplan to ensure the creation of an inclusive sustainable development.





### Site Opportunities

- The delivery of key public transport infrastructure through private sector investment
- The creation of new access to the south of Birchwood Railway Station
- The opportunity to enhance and upgrade Birchwood Railway Station to increase capacity, usage and customer satisfaction
- Aligns with rail and transport stakeholders aspirations, by facilitating enhancements along the CLC rail corridor. Not only benefiting Warrington but serving enhanced regional connectivity.
- The provision of a substantial park and ride scheme, with capacity for growth. This represents a significant opportunity to take cars off the road and encourage people onto public transport
- An improved gateway to Warrington major employment area and science corridor. The proposal serves the existing business community by delivering a significantly improved public transport infrastructure
- Assist carbon landscaping and carbon reduction
- The creation of a community hub with Doctors / Dentist and other community uses
- The provision of 1.6 million sq ft industrial floorspace
- The creation of an Employment Park/Business Hub to boost new business growth and support the opportunity for the creation of approximately 3,000 new jobs within the local economy once built
- Safeguarding and enhancement of key designated Moss land and protected habitats
- Creation of new green links and ecological havens
- A logical extension to existing settlement is in a highly sustainable location
- Deliverable within the next 3 to 5 years

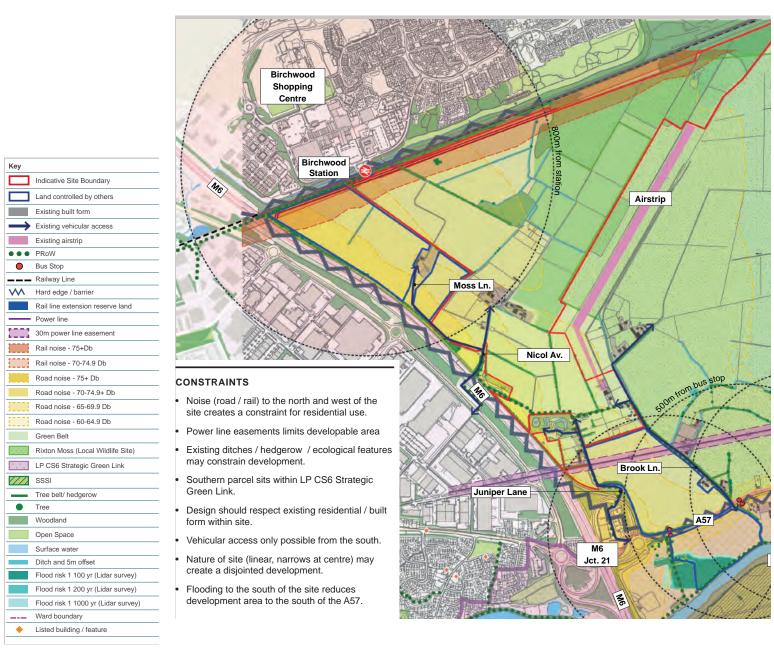


### Understanding Constraints

The mapping of key features, characteristics and constraints has facilitated a comprehensive understanding of the site. As such, these factors have each been carefully considered, providing a basis for an effective, appropriate masterplanning process.

The enclosed constraints plans have enabled the careful location of suitable land uses in line with specific contextual factors, guiding community services away from the M6 Motorway and closer to the railway station, enabling the formation of a 'community hub'.

Development has also been guided away from important peatland areas so as to protect these habitats.

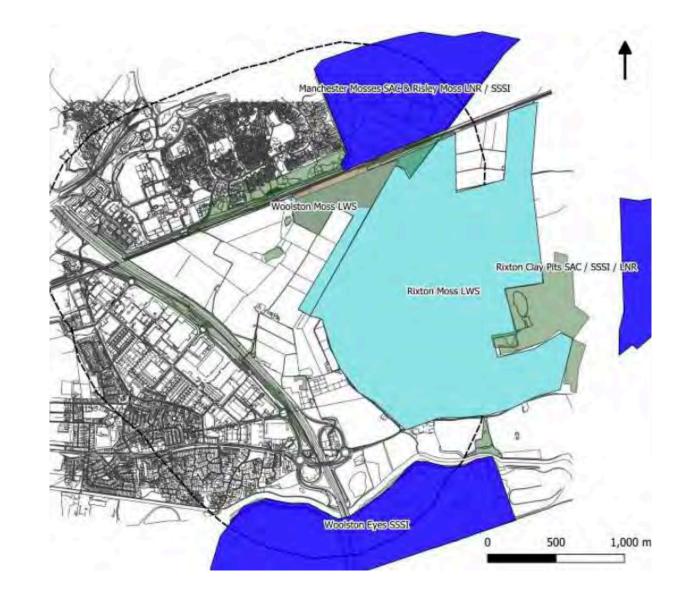


### Constraints Designated Sites

The Designated Sites Plan demonstrates the relationship of SSP land with regard to statutory and non-statutory designated sites within a 1km buffer. The proximate assets highlight site area's where additional consideration is needed with regard to land use in pursuing any development at this site.

Accordingly, the biodiversity value associated with protecting and enhancing these assets has been prioritised in designing the SSP proposals. It has therefore been a key development objective, seeking to secure biodiversity net gain across the development.

The mossland areas highlighted within this plan are a key site characteristic considered throughout the design evolution, as adjoining the site area their absolute protection from development is key. Whilst the mossland areas are most certainly not part of the proposals, it is the intention of SSP to allow for this safeguarding throughout the lifetime of the development and beyond.



### Design Development

It was originally the intention to pursue residential development at this site neighbouring the station hub. However, following discussions with Warrington Borough Council, we were encouraged to focus on provision for employment development.

The proposals will continuously evolve throughout the design process, which will take on board the following:

- The site's constraints and opportunities, in respect of physical attributes and planning considerations;
- The context analysis; and
- Discussions with sub-consultants

The land to be known as South Station Place presents itself as a logical urban extension, infilling the triangular parcel which is bordered by key transport corridors and dense urban development. A baseline analysis of the site and surrounding context has allowed the development to be guided by a series of design principles, centred around the vision for the area, including:

#### **Urban Design Objectives**

- To concentrate development upon the new access to Birchwood Railway Station which will become a focus for the new community
- To create an attractive walkable net carbon zero mixed use community using the best of current design guidance
- To create new and modern employment opportunities in an accessible location
- To encourage good design that will create places with distinctive character, which are pleasant to use and suitable in scale & to make efficient use of available land
- To promote character by responding to and reinforcing I
   locally distinctive patterns of development and landscape
- To promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public spaces
- To promote accessibility and local permeability by creating routes that are attractive, safe and work effectively for all users
- To promote legibility through development that provides recognisable routes, gateways and landmarks
- To create an attractive public realm with a series of linked streets, squares and spaces



### Design Development

The proposed development objectives and design principles draw upon the aspirations of the Garden Village principles, which include:

- Strong vision, leadership and community engagement
- Land value capture for the benefit of the community
- Community ownership of land and long-term stewardship of assets
- A strong local jobs offer in the Garden City itself and within easy commuting distance
- Generous green space, including: surrounding belt of countryside to prevent unplanned sprawl; well connected and biodiversity-rich public parks; high quality gardens; tree-lined streets; and open spaces
- Strong cultural, recreational and shopping facilities in walkable neighbourhoods
- Integrated and accessible transport systems

#### **Green Network Opportunities**

Garden Village principles seek to create generous green space within developments including well connected and biodiversity-rich public parks, high quality public gardens, tree-lined streets and open spaces.

The proposed development will seek to provide a firm and defensible long-term boundary to the green belt to the east whilst providing a soft outer boundary to the existing urban area in order to prevent unplanned urban sprawl. The proposals seek to enhance and promote the existing green infrastructure, through a series of green corridors, which connect the site and the surrounding area. In turn, this will provide a series of ecological corridors to enhance and promote biodiversity within the site and enhance the biodiversity value of the site and surrounding mossland for both the residential and employment areas.

These qualities will provide a key design framework for the development of the site. The green corridors are to be designed alongside pedestrian and cycle movement which navigate across the site, alongside a 'blue' network of sustainable urban drainage systems.

The Garden Village principles place emphasis on creating walkable neighbourhoods, which can be applied to a business context and which will be encouraged throughout these green networks, decorated as tree-lined streets to encourage travel via foot or cycle through an attractive landscape. This in turn promotes a healthy, sustainable community.

It is anticipated that the landscaping treatment for the 8 livework units will be characterised with high-quality and wildlifefriendly garden spaces. This includes, but is not limited to, the provision of bird boxes and baths, and the introduction of native plant species.

The landscaping provision, including provision for new open spaces and public parks, will be determined through the proceeding masterplanning process.



### Network Opportunities

#### **Blue Network Opportunities**

The landscape analysis acknowledged the importance of the existing 'blue' network of watercourses within the site's landscape.

The integration of the existing blue network into the development's design has been a critical element to ensure that the scheme responds positively to any future impacts of climate change.

The proposals seek to introduce a series of new Sustainable Urban Drainage Systems (SUDS), which will allow the Masterplan and future development the opportunity to prevent any surface water increase and control discharge rates into the existing and proposed network. These will be across all areas of the site.

#### **Urban Network Opportunities**

The development's design has sought to retain, incorporate and enhance the local landscape and site assets, including the character of the local mosslands.

Given the site's location between a rural and urbanising context, the design process has acknowledged the need to approach the development character of the site in a distinct way, which directly responds to the density, scale and design languages (architectural, landscape and movement) of the surrounding areas, and thus creates new character areas within the development.

This contributes to a passive approach to wayfinding and connectivity through improved interventions on legibility, such as key nodes, vistas and materiality. The nature and density of land use will vary across the site, to reflect contextual factors and constraints. The detailed design scheme will be set out to follow the following guidelines.

#### Land use and density design principles to follow:

- Community and Business Hub facilities concentrated close to Birchwood Railway Station and the heart of the development
- Lower density development towards the areas of open space and ecological corridors
- Heavy industrial development along the Motorway corridor

The response to the surrounding urban context will therefore contribute to the creation of character areas, leading from the strong vision, which will deliver a mixed-use community, providing an enhanced station, a range of employment uses and community facilities, in line with Garden Village principles.

### The Masterplan Concept

The proposed development has not been subdivided into distinct 'zones', however, the site analysis informing the design evolution has influenced land use location across the site, representative of various opportunities and constraints and the associated best use of certain land. As such, the more substantial commercial development has been located adjacent to the M6 Motorway, ensuring the business hub is situated away from the Motorway and closer to the enhanced station facilities, in turn forming the community hub.

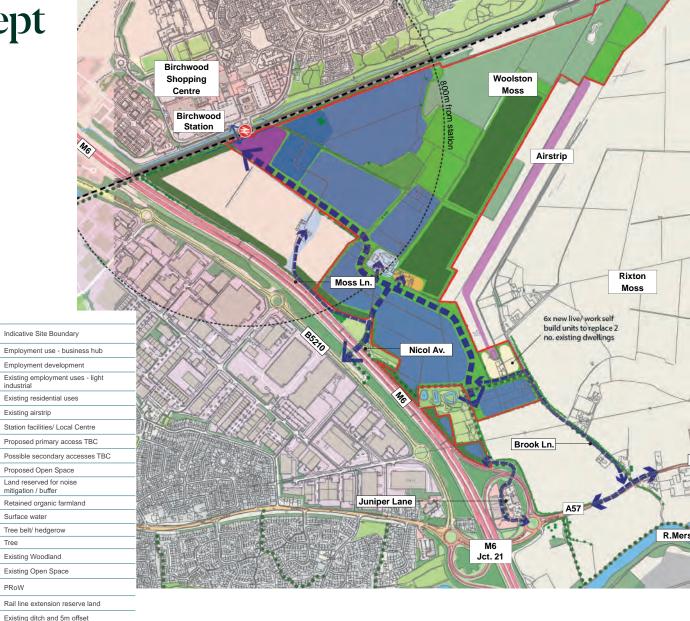
As the business hub has been situated around the enhanced station, this allows for the utilisation of the facilities in extending the presence and use of the station's community hub. Accordingly, akin to the settlement pattern of Birchwood, the livework units would be positioned away from the surrounding highways network, and towards the existing semi-rural setting, to enhance the 'living in a park' concept.

The various site areas identified for green network opportunities have been located adjoining the proposed new green belt boundary, so as to provide a softer outer boundary.

Patrick Properties are working with landowners and two development scenario's are being considered, both of which are deliverable.

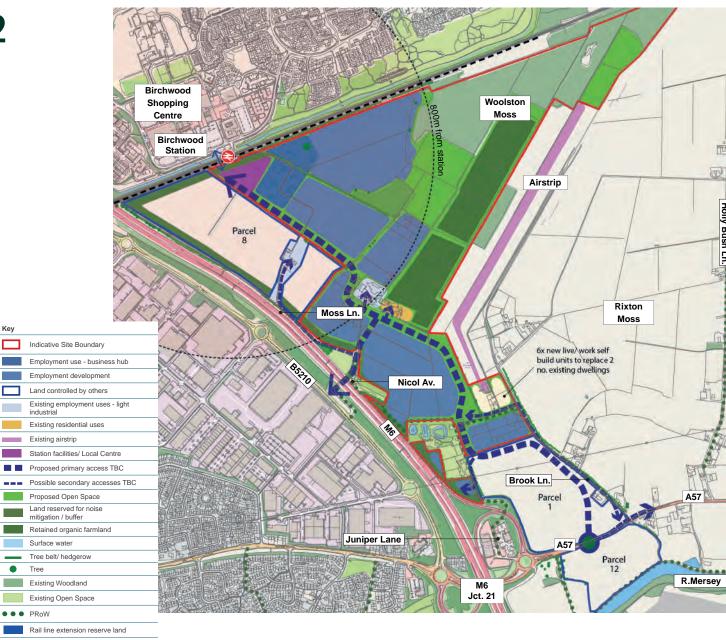
Tree

PRoW



### Masterplan Option 2

The constraints set out for the site have helped to shape the nature, form and location of development across the site area. This analysis process has led to the production of the site's development framework, identifying key areas of opportunity.



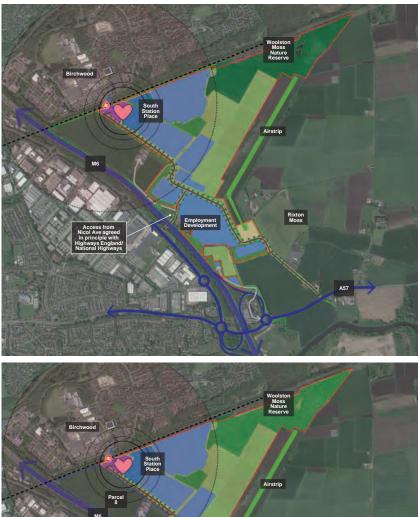
Kev

### SSP Masterplan

The vision of SSP to deliver a new link road, park and ride, a new community and employment hub, through allocation in the draft Local Plan, is demonstrated to be exceptionally justified and 'sound'. Alongside this new development and associated infrastructure, the proposals will also provide the opportunity for new parklands and the creation of a new Nature Reserve and Country Park area, including over 45 acres of public open space and woodland for informal use. These areas will assist in providing a robust long term boundary for the green belt and will generate significant benefits for the local community and wildlife, as links to the existing residential areas both by foot and cycleway will be enhanced. This section will set out the masterplan and development framework for South Station Place.

This site represents an integral opportunity for an urban extension, whilst seeking to provide much needed enhanced rail services and facilities, along with employment development within the local area. The proposed development will provide substantial transport, employment, economic and environmental benefits in a sustainable location that will make a major contribution to the needs of Warrington over the next decade. However, the opportunity for enhancement of the station and the creation of a new southern access will be one of the first elements taken forward, thus ensuring the key benefits are experienced early on in the process. The proposed scheme has evolved through a series of appraisals, planning and design consultations, with detailed discussions between the promoters of the site, their design team and relevant stakeholders, prior to being presented to the Council.

Patrick Properties are working with landowners and there are two development scenario's being considered.





### SSP Masterplan

In addition to the infrastructure improvement flexibility this scheme offers, the development of the station is an additional integral aspect of this proposal, which would provide substantial improvements to the transport facilities across the area, whilst enabling wider regional benefits.

#### These benefits are considered to comprise of:

- An enhanced provision of rail services and therefore capacity of the station
- Improving the accessibility of Birchwood as a destination
   and supporting its growth and development
- Supporting the reduction in traffic congestion through the new link road and being better served by public transport, therefore reducing car reliance
- Reduction in vehicle emissions in Birchwood, Padgate, Woolston through to Warrington Town centre by providing a park and ride facility supporting the clean air agenda and improving air quality in these areas
- Enhanced station facility Improved desirability and therefore usability of the railway station as a key transport service
- Opening up job opportunities throughout the Birchwood area, being considered a more sustainable location for business
- Open up the land to the south as a key development site, with the station acting as a gateway

A recent study by the Rail Delivery Group "Station Investment: A Catalyst for local economic growth" provides evidence of how recent improvements made at Nottingham, Chelmsford, Strood and Burnley Manchester Road stations, some of which funded through Public/Private Partnership as promoted in this scheme has led to wider regeneration and development of areas, growth in service sector jobs and increases in house prices for the local community.

Whilst the need for service and infrastructure improvements have been proven by the industry it has been historically difficult to unlock the funding from the rail industry, local and national government to undertake the improvements. The commitment to private development funding for the station that we propose, with the added support of Warrington BC, Merseytravel/Liverpool CA, Transport for Greater Manchester/ GMCA and Network Rail and the publicly owned train operator (Northern Trains Limited), can only further strengthen the case for funding from the treasury for these infrastructure improvements to come forward. Conversely, if a decision were taken not to commit to these works and secure the private investment that would be generated would only heighten the costs of any development to the public purse which may potentially make the scheme unviable when business cases are tested.

Warrington Council's Infrastructure Delivery Plan has identified a private-public opportunity for transport-led development at Birchwood station, equating to a  $\pm 37,000,000$  investment.

### **Development Objectives:**

- To deliver key strategic public transport Infrastructure which is aligned with the aspirations of Network Rail, Warrington Borough Council and the wider regional and local transport sector.
- To create a new southern access to Birchwood Station, allowing for future expansion, an increase in usability and improved customer satisfaction.
- To create an opportunity for rail infrastructure enhancements and support the CLC line with rail turn backs and bay platforms.
- To create a new park and ride that has opportunity to grow to suit future demands.
- To provide enhanced station facilities and public realm areas, supporting the existing business community and local residents with investment into public transport.
- To meet the aspirations of 'levelling up' through considerable private investment in public infrastructure.
- To create and enhance pedestrian and cycle links.
- To create a sustainable urban extension that maximises connectivity and linkages across and beyond the Borough of Warrington, in addition to wider services and facilities.
- To secure high quality design that follows the principles of sustainable development.
- To create sustainable patterns of development which exploit and improve accessibility to public transport.

- To create substantial new employment opportunities in a location accessible by a variety of forms of transport, including pedestrian, cycle and public transport accessibility.
- To protect and enhance adjacent mossland whilst creating new green links and ecological havens and understanding peat restoration.
- To provide high quality, safe and publicly accessible open space and community facilities.
- To provide a flexible and adaptable scheme that ensures inclusive access for all end user requirements.

The above objectives have been largely predicated upon the Garden Village principles.



### Design Approach

The SSP masterplan has been designed in line with various forms of site analysis and assessment, therefore ensuring the process be well informed regarding site context, characteristics, opportunities and constraints. This design approach has therefore sought to facilitate the creation of a truly integrated urban extension, materialising itself as a sustainable community. Accordingly, the masterplan has been shaped positively by these characteristics in line with the defined development objectives. The design approach has been led by the intention to secure a mixed-use development of this site with a focus on transport, in particular a new link road and park and ride facility.

South Station Place Community

South Station Place Workplace South Station Place Connectivity

South Station Place Commercial

### Accessibility and Transport

The mixed-use development at South Station Place will include the Park and Ride scheme and improved station facilities, new access by means of a new southern link road that will connect into the local road network and Junction 21 of the M6 that is located immediately adjacent to the site. The Park and Ride development - initially providing 300 car parking spaces, including 30 disabled spaces and 10 electric vehicle charging points - will have capacity for growth, to accommodate higher levels of commuters subject to demand. It is anticipated that phase 2 of the car park could extend the capacity up to 500 spaces. The proposal also includes provision for rail turn back facilities that would serve both main lines to Manchester and Liverpool. The station enhancements will include the creation of a community hub, whilst improving the service provision, seeking to make the rail experience more user friendly and accessible. As such, this is a public transport-led proposal with a focus on park and ride at Birchwood Railway Station to facilitate 'greener' travel, and there are also opportunities for bus service provision to the area to be improved. The South Station Place proposals will provide improvements to pedestrian and cycling facilities in the area, including upgrades to existing footpaths, new crossings, linkages to external networks and the creation of new foot and cycleway routes.



### Employment

The site represents a promising development opportunity due to its advantageous location, adjacent to the M6 motorway, close to the M62 interchange and local railway facilities. The SSP development seeks to build upon Warrington's strong position within the regional economy, taking advantage of the site's location and therefore providing opportunities for businesses to invest and to provide employment within the target markets of transport, storage, logistics and manufacturing. The site is in the ideal location to attract occupiers to its commercial development, through its connectivity to the national motorway network and to major population centres.

The heavy commercial aspects of the development will be concentrated on land adjacent to the M6 motorway, being expected that the majority of employment land will be more suited to this location. The South Station Place proposals include almost 75 ha of land for employment development, in Use Class B8, with 20% for B2 use. The masterplan also includes a 'business hub' adjacent to the station enhancements, for lighter employment use. Allocation is also made for Grade A accommodation and larger scale units. The intention for the employment areas of SSP is to ensure their flexibility so as to facilitate attraction by a range of businesses to the site. The level of development constitutes an efficient use of land, providing accommodation in a range of sizes and types, to meet varying business and employment needs. The nature of the layout and the units constructed at this site has been informed by BE Group, identifying warehouse floorspace to be of shortage across the Borough.

The economic analysis undertaken by Ekosgen concluded that the SSP development would facilitate the provision of 2.1 million sq ft of new employment floorspace, catering for over 2,500 employees during construction and up to 3,000 new employment opportunities during the operational phases. The extent of indirect effects associated with this scheme are important to consider, whilst the investment shown to a scheme of this scale would encourage further growth and investment in the Borough.



### Nature Conservation and Open Space

#### **Nature Conservation and Open Space**

As set out through the design evolution, the SSP proposals have been designed with due consideration to the site's distinct context. As such, the scheme has sought to protect and enhance the existing environmental assets across the site and the surrounding land, with the intention to make a material positive impact upon nature in the local area.

Peat restoration and enhancement is identified as the key area for environmental enhancements and thus biodiversity net gain across the site. Opportunities for further habitat creation are also identified across the more eastern edge of the site. This will include maximising opportunities to improve wildlife connectivity through and outside of the site. During the restoration process, there is also ample opportunity to introduce rare and specialist plant species (which have been successfully reintroduced to other mosslands such as Risley and Cadishead), such as sundews, white beaked sedge, and a variety of sphagnum moss. There is also potential for the local Wildlife Trust to include the site in future re-introduction projects (for example, large heath butterfly, white-faced darter, and the bog bush cricket).

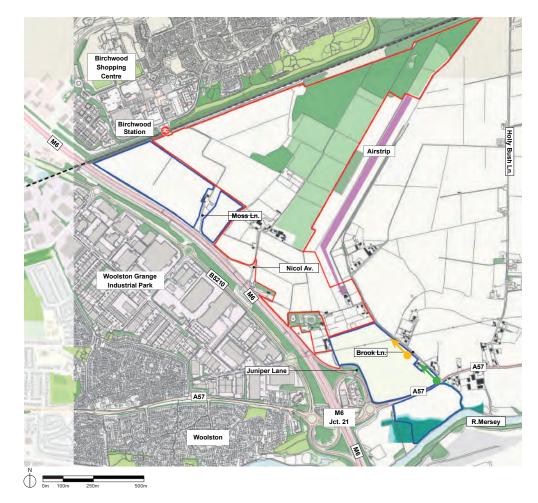
A series of formal and informal green spaces across the site will provide a range of amenity and recreational functions, which will comprise of over 45 acres of public open space and woodland for informal use.

### 6.0 South Station Place Masterplanning

### Landscaping

The revised Green Belt boundaries proposed in line with the SSP development are strong and logical, in line with natural and developed boundaries. These boundaries are formed by both mature hedging and tree planting, along with existing built form and transport corridors. The following landscape boundary analysis highlights this.







#### View 1

Southern end of Brook Lane, looking north-west along the site's eastern boundary.

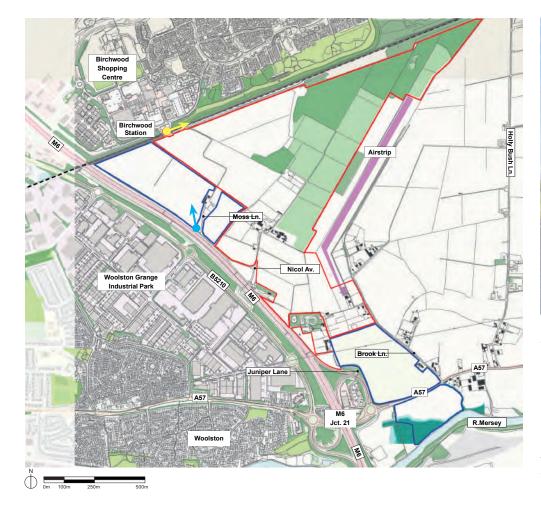
The existing residential development here and the mature tree line beyond demonstrates a strong boundary, making a clear distinction between SSP land and the neighbouring mossland to the east.





Brook Lane looking north-west along the site boundary.

The view highlights the nature of the proposed boundary, characterised by further mature tree planting, along with an extent of existing development forming a strong, logical development boundary.

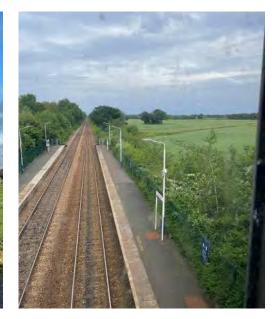




#### View 3

Moss Lane looking north towards Birchwood and the railway station.

The view highlights the strength of the site's northern boundary, significantly formed by mature trees and hedging, whilst the town's built development is



#### View 4

Birchwood Railway Station looking east along the CLC line.

This view highlights the defensible boundary of the railway line, along with the screening to its north and wider boundary hedging across the more eastern aspects of the site in the distance.

### 7.0 Birchwood Station

## Background

Birchwood Railway Station is serviced by the Cheshire Lines Railway, which runs across Lancashire and Cheshire. The route is also referred to as the 'CLC Corridor', an important route between Liverpool and Manchester via Warrington.

British Rail first opened Birchwood Station in 1981. However, the railway line dates back to the 1860's and was key in supporting the development of the area, transporting the explosives for, and products of the nearby Royal Ordnance Factories through World War II. The line was also used pre-war, to transport farming goods from the then named farming community of Risley.

### **Current Situation**

The existing access to Birchwood Station is poor and only available via heavily trafficked routes. It is not easily accessible for rail users. The high level of traffic inevitably leads to condensed carbon emissions around the station and poor air quality.

The station building itself is tired and provides very little in the manner of customer focused amenities whilst there is only limited dedicated station parking in the region of 18/20 spaces, which is of no benefit to commuters.

Although accessibility around the station itself is inclusive, the layout and access arrangements close off the south side of the station and any local residents approaching from that side. The station itself is not fully accessible and, especially out of hours, is regarded as unsafe.

Previous studies undertaken have indicated an industry desire to improve service volume/capacity along the line of the route.



SOUTH STATION PLACE

## **Station Potential**

The station is somewhat restricted with regard to the rail services it is able to provide. The development of a turnback facility at this station would significantly enhance its rail capacity and as such, support its growth as a key transport hub.

Accordingly, the provision of a 'Park & Ride' facility is anticipated to support this growth of Birchwood Railway Station and the wider area, with good quality, reliable, convenient and user friendly transport facilities.

Accessed from Dewhurst Road to the north, access to and around the station itself is limited. Access to the station from the south and eastern directions is obstructed by the adjoining green belt land, cutting off these areas from the station. The M6 Motorway further restricts the ease of access from the west. As such, pedestrian permeability around the area is limited due to these obstructions. The development of this land area therefore provides an opportunity for the opening up of access to the station from this southern direction.

In line with the enhancement of rail services, Birchwood Railway Station holds the opportunity for the modernisation of its facilities, opening it up as a key transport node and therefore better supporting its presence as a competitive transport opportunity and wider destination.

The development would deliver improved station facilities including a community-hub and public realm enhancements.





### Benefits

The development of the station is understood to be an integral aspect of this proposal, which would provide substantial improvements to the transport facilities across the area, whilst enabling wider regional benefits. These benefits are considered to comprise of:

- An enhanced provision of rail services and therefore capacity of the station:
   Improving the accessibility of Birchwood as a destination and supporting its growth and development
  - A new access road would serve Birchwood Station from the south and this would alleviate existing traffic congestion and parking issues at the station, enhancing its appeal, usability and service offering, therefore reducing car reliance.
- Enhanced station facility:
  - Improved desirability and therefore usability of the railway station as a key transport service
- Opening up job opportunities throughout the Birchwood area, being considered a more sustainable location for business;
- Open up the land to the south as a key development site, with the station acting as a gateway
- The proposal aligns with National Highways aspirations for improved rail infrastructure as noted in National Highways (former Highway Englands formal comment on the emerging local plan 12th June 2019. Please see attached within Appendix
- The proposal aligns and facilitates rail aspirations for the CLC corridor as identified in Network Rails document " How to accommodate forecast growth on the Cheshire Line Committee (CLC) corridor?" Please see attached in Appendix
- The proposal aligns with the Urban Transport Group definition of transport oriented development. Please see attached Appendix
- The proposal aligns with Keith Williams and the Governments shared vision for improving Great Britain's Railways. Please see attached Appendix









The Department for Transport's Rail plan – 'Great British Railways' sets out the following vision and key principles.



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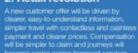
### How the railways will change for the better

Keith Williams and the government have a shared vision for Great Britain's railways that can be summarised in 10 outcomes.



#### 1. Modern passenger experience

Passengers must receive high-quality, consistent services day in, day out. This means accessible, reliable journeys that are well connected with other transport services and include new





#### 3. New way of working with the private sector

Passenger Service Contracts will replace franchising, bringing a new focus on reliability, performance and afficiency. New opportunities for innovators, suppliers (including small and loca





#### 4. Economic recovery and financially sustainable railways

The railways are a public service, paid for by taxpayers and passengers to connect places and foster economic growth through leveling up across our towns, cities and regions. Bringing together responsibility for cost and revenue across the system will ensure the raiways become more financially sustainable



#### 5. Greater control for local people and places

Railways will be more responsive to the needs of local communities and oustomers, whether from Woking, Wrexham or Wick. Empowered, locally-led teams will support

### 6. Cleaner, greener railways

Britan's reliveys can and will spearhead the nation's ambition to become a world leader in clean, green transport. Decarbonisation, greater biodiversity and improvements in air quality in



#### 7. New offer for freight

The pendemic has highlighted the importance of freight to our country greater opportunities for growth and strong safeguards will put rail freight

#### 8. Increased speed of delivery and efficient enhancements

Restoring lost rail links and accelerating the delivery of critical upgrades to the network will help level up places across the country, spark new economic growth and improve public transport connectivity and prosperity across



#### 9. Skilled, innovative workforce

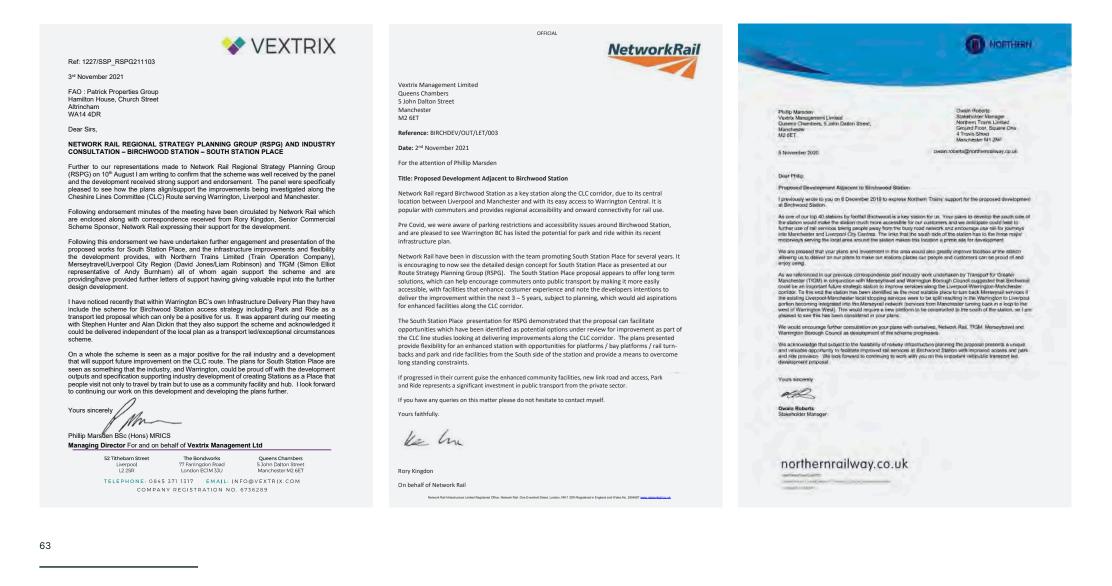
diversity across the sector will create new opportunities for the hundreds of thousands of people working on our railways. High-value jobs for the future will be created and make the most of data and



#### 10. Simpler industry structure

Track and train will come together in a 'guiding mind' for the system, Great British Railways. It will be made up of regional railways that are and incentives focused on serving customers. A 30-year strategy will enable the sector to modernise efficiently.

The opportunity set out to make enhancements to the rail service offering at Birchwood through the implementation of turn backs and park and ride, in line with station facility enhancements has received significant support from the rail industry. This support is set out in the accompanying letters of support.



### The proposal facilitates regional improved connectivity please see attached letters of support from Liverpool and Manchester stakeholders.



This proposal will improve access to the station making rail travel more appealing. This will support the use of a sustainable transport form both into and out of the City Region.

It also supports the development of rail services on the CLC route which the LCR also supports.

The LCR is currently building battery operated Class 777's for operation on the line out to a new station at Headbolt Lane. These units could be used in developing the extension of the Merseyrail service along the CLC route to Birchwood. With this in mind, the LCR would like to see any proposal developed to have incorporated within it a Liverpool facing turnback facility at Birchwood capable of handling a service operated by eight car Class 777 units.

Yours sincerely,

**CIIr Liam Robinson** 

Liverpool City Region Combined Authority Transport Portfolio Holder Chair of Transport Committee

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Phillip Marsden Vextrix Management Limited Queens Chambers 5 John Dalton Street Manchester M2 FFT 0161244 1000 www.tfgm.com Our ref Birchwood Station Your ref

2 Piccadilly Place Manchester M1 3BG

5<sup>th</sup> November 2021

Dear Phil

#### Proposed Development Adjacent to Birchwood Station

Thank you for taking TfGM through your proposals for the development of Birchwood Station with the introduction of a new link road, station building and 300 space car park south of the existing station and CLC Line, with the capacity to add additional spaces subject to demand.

I am aware of the strong commuter flows from Warrington and surrounding areas into Manchester and also recognise the highways and parking constraints around Birchwood Station that may preclude use of the railway, therefore exacerbating issues on the GM road network, with additional commuter journeys into Manchester City Centre. As such we would welcome this development and believe it will have a positive impact on road congestion in Greater Manchester, an issue we are working hard to address.

You are aware of our plans to work with DfT, Network Rail, Warrington Borough Council and Merseytravel in developing a scheme in and around Birchwood to deliver an improvement in rail services. I am pleased that you are working with my team to understand the detail of these proposals and I welcome your assurance that your developer will make the necessary passive provision for this in their plans.

Please keep us updated on the above-mentioned passive provision, so we can consider how best we could potentially support this project.

Yours sincerely

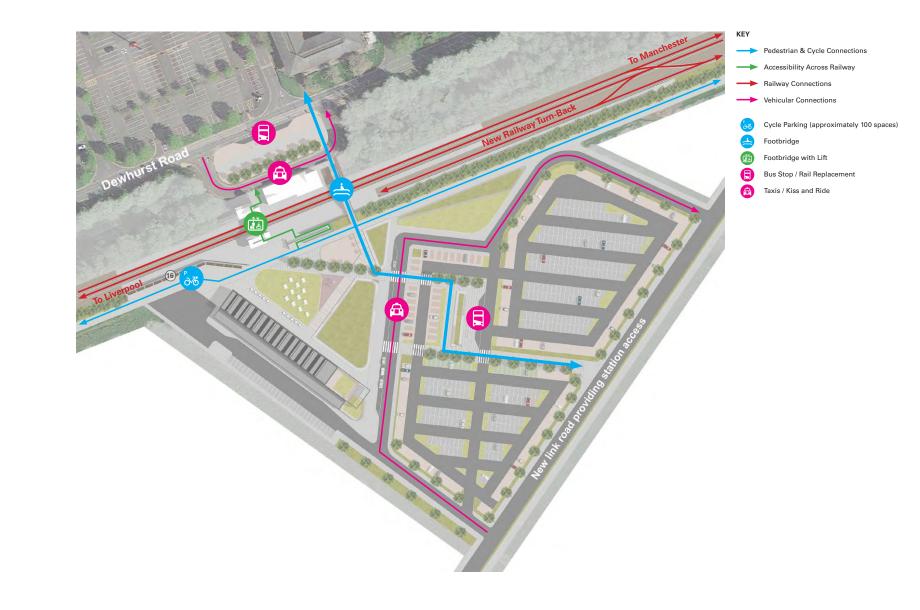


Simon Elliott Head of Rail Programme Direct line 0161 244 1536 Email simon.elliott@tfgm.com

Transport for Greater Manchester is an executive body of the Greater Manchester Combined Authority

### South Station Place Integrated Transport





### South **Station** Place Development





1. New Local Retail / Community Units 5 no. units (dependant on configuration) for retail / community use, providing 10,000 square feet of space with back of house service areas. Potential uses include: Coffee Shop, Bakery, Convenience Supermarket, Pharmacy / Healthcare, Nursery / Childcare and Community use / pop-up.

#### 2. New South Station Entrance

Hard landscaping steps and ramped access between station and new public realm, allowing for full disabled access

3. Public Footbridge Enhancements Existing public footbridge to be refurbished and reclad to upgrade passenger environment, structurally independent staircases may be added to both intermediate landings either side of the bridge to create a direct pedestrian route across the railway line

#### 4. New Public Realm

Green landscaped public realm to front of retail units and south station entrance to provide space for outdoor seating, public events etc.

5. Playground Small public playground with play apparatus to public realm

6. New Public Realm & Bus Interchange Revamp the existing station frontage to the north and provide new bus interchange facilities with feature bus shelter / ticketing facility

#### 7. New Park and Ride Car Park

300 space surface car park to south of station including 30 no. disabled parking spaces and 10 no. electric vehicle charging points

Electric Vehicle Charging Spaces Approximately 10 spaces within car park to be designated for electric vehicle charging in premium position

### 9. Rail Replacement / Bus Park-and-Ride Integrated bus stop and ticketing facilities within car

park, including car park pay points, to allow use of parking for bus park-and-ride or rail replacement services

**10. Pick-up / Drop-off** Vehicle pick-up and drop-off point to the south side of the station in close proximity to station entrance

11. Existing Station Building To be retained

### 12. Existing Overbridge with Lifts To be retained and used to provide public access across the railway line

**13. New Cycle Parking** Array of cycle shelters to provide high quality and secure cycle parking for the development and station

14. Rail Turn-backs Position of rail turnbacks to TBC pending further study by others, masterplan to keep space reserved for turnbacks

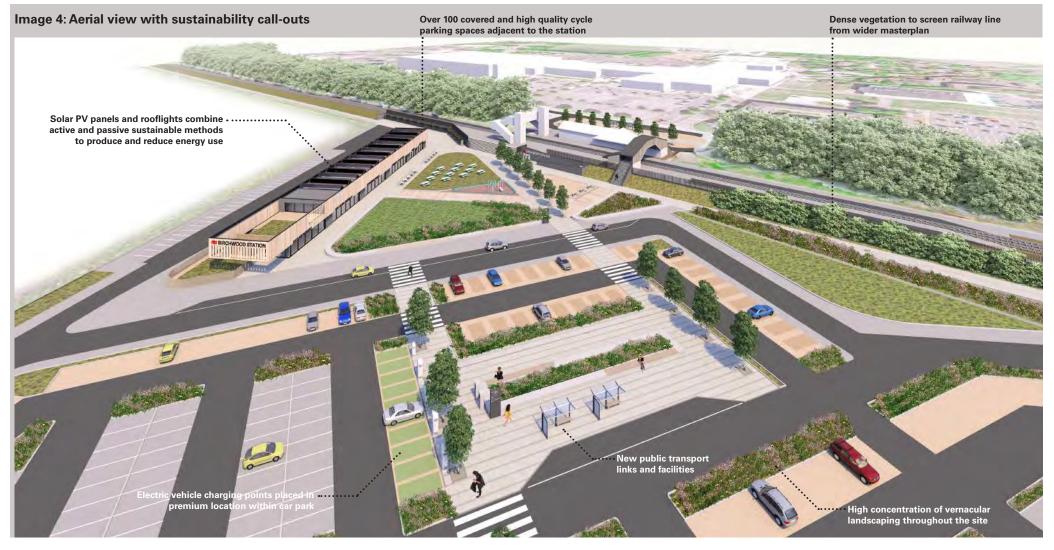
#### 15. New Bay Platforms

Bay platforms incorporated either side of the station for services to and from Manchester and Liverpool

### Station of the Future, for the Community Delivered in Public/Private Partnership



## Sustainability / Environmental Development



# 8.0 Employment

## Employment

The South Station Place proposals include almost 75 ha of land for employment development, falling within Use Classes B2, B8 and E. South Station Place is considered to represent a significant development opportunity due to the advantageous location of the site, adjacent to the M6 motorway, close to the M62 interchange and local train facilities.

Warrington is considered to be a strong performer within the regional economy, with a higher-thanaverage employment rate, higher jobs density and workplace-based employment growth over the last ten years, in comparison to the North West average. Therefore, these proposals seek to build upon this by providing further employment opportunities within the target markets of transport, logistics and manufacturing – with in particular, transportation and storage, the sectors of fastest growth in Warrington.

Sites close to the national motorway network and to major population centres are considered most attractive to occupiers and as such the development site is within a prime location to respond to these requirements. In recognising the market demand, it is intended that approximately 80% of the employment land will accommodate B8 requirements and 20% B2 requirements, with a small element of service employment space to be located adjacent to the station. The development site not only provides for additional B2 and B8 floorspace but as part of this for the construction of Grade A accommodation and larger scale units. Whilst the proposals are capable of providing flexibility in the scale of development, the current layout, informed by research undertaken by BE Group, is based upon logistics and industrial requirements of approximately 250,000 sq ft, with a number of circa. 20,000 sq ft units anticipated to satisfy other operational needs.

The employment area will comprise principally single storey large warehouse units, reflecting the industrial nature of the uses. However, the proposals have flexibility for potential occupiers in enabling supporting and ancillary uses to be located together. The flexibility in scale of plots will also allow it to respond to both current and future needs as businesses grow. Units would have associated hardstanding areas to contain their required car parking, vehicle manoeuvring and storage provision.





# Employment

Soft landscaping within the areas proposed for employment use may be limited, however, further landscaping can be provided on site boundaries or through the provision of drainage solutions such as swales and ponds. Direct access would be provided from J21 via new primary roads with the ability to have active frontages along these highways. The design and appearance of units would be of a modern, high specification to suit this landmark development.

Ekosgen analysis of the South Station Place proposals have concluded that the construction phase of the development will support 2,670 direct full-time equivalent jobs during the 3 to 5 year construction period, which is increased to 3,551 jobs with the inclusion of multipliers (indirect effects). There would be opportunities both for skilled labour as well as for apprentice programmes, leading to longer term benefits for the Warrington economy.

In addition to the main logistics areas, a Business Hub is to be created alongside the Community Hub which will provide smaller business and starter units under Class E.

#### Table 1: Forecast for Proposed Construction Jobs created by the development proposals (source: Ekosgen).

The provision of jobs once the site is operational will depend upon the scale and variety of opportunities brought forward by employers, however it is estimated that once fully operational, the development could accommodate for approximately 3,000 jobs across a variety of occupations and skills bases.

Forecast Operational Impacts				
	Jobs (FTEs)	GVA		
Direct	3,019	£188.4m		
With multipliers	3,894	£245.3m		
Source: Ekosgen calculations using HCA Employment Densities Guide and ONS Regional Accounts				

#### Table 2: Forecast for Proposed Operational Jobs created by the development proposals (source: Ekosgen)

The proposed uses would introduce a range of skills roles to support the employment opportunities of local residents, with opportunity for career progression evident.

Forecast Construction Impacts				
	Jobs (FTEs)	GVA		
Direct	2,670	£173.7m		
With multipliers	3,551	£231.0m		
Source: Ekosgen calculations using Annual Business Survey, Business Register and Employment Survey (BRES) and the Annual Population survey, ONS Regional Accounts and HCA Additionality Guidance				

# Employment

Patrick Properties are industry leaders in the provision of logistics and other industrial floorspace and as such the proposals brought forward in this location will represent exemplar facilities. Whilst units are intended to be built speculatively, due to experienced demand, a high level of pre-lets are anticipated.

### As such, the overriding economic benefits of the scheme comprise:

- The provision of 1.6 million sq ft of new employment floorspace catering for over 2,500 employees during construction and up to 3,000 new employment opportunities during the operational phases;
- The payment of business rates by new businesses;
- The support and investment shown to a scheme of this scale would encourage further growth and investment in the Borough;
- The opportunity to provide larger units would also enable existing businesses to stay in the area as they expand;
- The wider proposals comprising a part of this development, including improvement of the local train station facilities and provision of new homes, will also have a positive impact upon the employment proposals, providing users with improved transport links and the opportunity to live close to their place of work, reducing reliance on the private car;
- The wider proposals provide employees with access to public open space with associated health and wellbeing benefits.

### Table 3: Forecast for Occupation Types created by the development proposals (source: Ekosgen)

Skills and Occupational Profile					
	FTEs	%			
Skills Profile					
Level 4+	490	16%			
Level 3	617	20%			
Level 2	606	20%			
Level 1	1,306	43%			
Total	3,019	100%			
Occupational Profile					
Managers, Directors & Senior Officials	297	10%			
Professional Occupations	223	7%			
Associate Prof. & Technical Occupations	292	10%			
Admin & Secretarial Occupations	235	8%			
Skilled Trades Occupations	295	10%			
Sales & Customer Service Occupations	192	6%			
Process, Plant & Machine Operatives	179	6%			
Elementary Occupations	1,306	43%			
Total	3,019	100%			
Source: ONS Annual Population Survey and SOC Code Methodology					

# "Working in a Park"

Birchwood Forest Park was originally the name given to the entirety of the Birchwood area at the time the New Town was first established. The intention of the New Town was to create one of the country's most natural looking towns, described as somewhat "Living in a Park."

However, such aspirations have proven challenging to maintain with the growing demands and growth of the local economy and population.

Ekosgen have prepared a Birchwood Socio-Economic Assessment, in relation to the development at South Station Place, which understands that by 2040, Warrington will be home to almost 217,100 people – an increase in population of 6,468 (+3.1%) over 20 years, as suggested by ONS Population Projections. The age structure of Warrington has also seen significant changes. In 2040, those aged 65 and over are forecast to account for 25.7% of the Borough's population and those aged 80 and above will account for 8.0% of the population. The 'South Station Place' development provides the opportunity to return to the earlier vision of the New Town, in effect to facilitate "Working in a Park", whilst satisfying local and regional demand for employment space, through the provision of a highly sustainable, net carbon neutral business hub, set within a biologically diverse, green environment.



SOUTH STATION PLACE

## Character Areas & Masterplan Development

The Framework Masterplan sets out the overall aspirations of the site's development. The development of the Masterplan derived from a study of the site's features and associated constraints and opportunities, which assessed the most feasible and practical options concerning the type of development and appropriateness of the positioning of each element of the scheme within the site boundary.

As the scheme presents an opportunity for an appropriate urban extension, the layout seeks to respond to the surrounding urban context of the immediate area, particularly mirroring the settlement pattern of Birchwood to the north.

The proposed employment land is expected to sit adjacent to the M6 Motorway, in a similar nature to that of the Woolston Grange Industrial Park to the west, and the office and retail development to the north of the site, within Birchwood itself. The response to the surrounding urban context will therefore contribute to the creation of character areas, which provide some extent of individuality within the site, whilst ensuring the established 'vision' of the scheme is focal in the design development, which is to create an integrated and sustainable working environment.

## Development Mix

The proposed development mix will be subject to detailed design, site extent and the requirements of the market but will broadly consist of up to:

The proposal has already secured significant interest from end occupiers. Further evidence to support this can be provided.

Use	Gross area (ha.)	Acres
Industrial and Logistics	40.68	100.48
Other Employment Use and new station facilities/ parking	2.79	6.89
Other Station Reserve land (within red line)	0.24	0.59
Noise Buffer zone/ green corridor	6.05	14.94
Retained farmland	15.13	37.37
Retained mossland	21.51	53.13
Rixton Moss Retained Land	29.56	73.01
Existing residential uses retained	0.57	1.41
Replacement residential	0.64	1.58
Existing employment uses retained	2.74	6.77
Airstrip land retained	1.09	2.69
Spine Road - 18.8m corridor assumed (Width/ route to be determined)	4.68	11.56
Sub-total	125.68	310.43
Remainder assumed open space/ mitigation	22.73	56.14
Total Site Area	148.41	366.57

NB: To be read in conjuction with Broadway Malyan drawing 34799-03-001

# 9.0 Nature Conservation and Open Space

### Nature Conservation and Open Space

The aim of the proposal is to create a development that is as nature friendly as possible, whilst creating an attractive place to work, commute and enjoy.

Tree planting will form part of a comprehensive landscaping scheme across the site. It is encouraged that existing trees and hedgerow within and around the site will be maintained where possible and incorporated into the proposed landscaping scheme. The planting scheme would focus on the use of local provenance nature species and the establishment of appropriate habitats to the area. Where it is not possible to retain a specimen, replacement provision will be ensured. Planting will be retained where possible along the site boundaries to act as a buffer between the development and the surrounding land uses and road network. The existing woodland within the site will also be retained, ensuring it is well protected throughout the construction period.

Garden Village principles seek to create generous green space within developments including well connected and biodiversity-rich public parks, high quality gardens, tree-lined streets and open spaces. Accordingly, the integration of accessible, usable and thus effective public open space (POS) has been a key priority throughout the design evolution of South Station Place and will continue to be an increasingly high priority in the detailed design and development of this new community. The proposals seek to enhance and promote the existing green infrastructure, through a series of green corridors, which connect the site and the surrounding area. In turn this will provide a series of ecological corridors to enhance and promote biodiversity within the site and enhance the biodiversity value of the site and surrounding mossland for both the residential and employment areas of the site.



### Nature Conservation & Enhancements

The SSP proposals have been designed with strict consideration toward ecological assets across the site and the surrounding landscape. The development holds the intention to make a material positive impact upon nature in the local area, with corresponding benefits for ecology and nature. The ecological surveys undertaken by Bowland Ecology confirmed the extent of areas of peatland as a key feature of a small part of the site but also the adjacent mossland.

The site includes approximately 11.5 ha of birch woodland and mossland and therefore provides significant opportunity for habitat restoration and wider ecological enhancements.

### **Species Reintroduction**

During the restoration process, there is also ample opportunity to introduce rare and specialist plant species (which have been successfully reintroduced to other mosslands such as Risley and Cadishead), such as sundews, white beaked sedge, and a variety of sphagnum moss. There is also potential for the local Wildlife Trust to include the site in future re-introduction projects (for example, large heath butterfly, white-faced darter, and the bog bush cricket).



### **Peat Restoration**

The ecological surveys completed by Bowland Ecology identified significant potential for habitat restoration within the site, in particular lowland peat bog ('moss land') restoration. Successful examples of mossland restoration can be seen in the neighbouring Risley Moss and across the wider surrounding area. It is recognised that these Peat bogs are a vital habitat and valuable carbon sink when preserved in good condition, however, when dry and degraded they release stored carbon back into the atmosphere. The fragment of peat currently on site is of this condition and is therefore making a detrimental impact with regard to carbon storage.

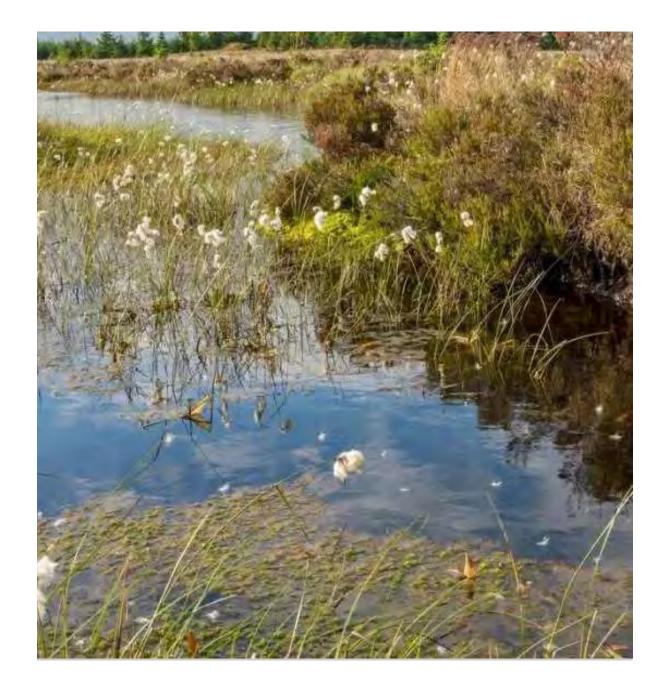
### Peat covers just 3% of the world's surface area, whilst holding nearly 30% of all the carbon stored on land.

Whilst it is understood Woolston and Risley once connected to form a large mossland, peat restoration in line with these proposals would allow for habitat enhancements, reduced fragmentation and the creation of quality linkages between Risley, Woolston and Rixton moss, which in turn will expand the existing peatland significantly.

It is understood that following restoration of Risley moss, animal species would naturally migrate towards favoured habitats and there would be the opportunity to introduce rare and specialist plant species, including sundews, white beaked sedge and a variety of sphagnum moss. In proceeding with these works, the peatland would be regenerated through re-wetting the and, filling in ditches and using peat 'bunding' to retain the water. Site investigations, including hydrology, are and will be undertaken to support the peatland restoration purposes.

Areas identified for peat restoration and other wider habitat creation opportunities are indicated in the 'potential habitat restoration and creation areas' plan.

It is important to highlight that these proposals have been suitably designed ensuring that any areas where peat is identified will not be developed and will instead be maintained and restored to achieve positive impacts for nature and ecology. 79



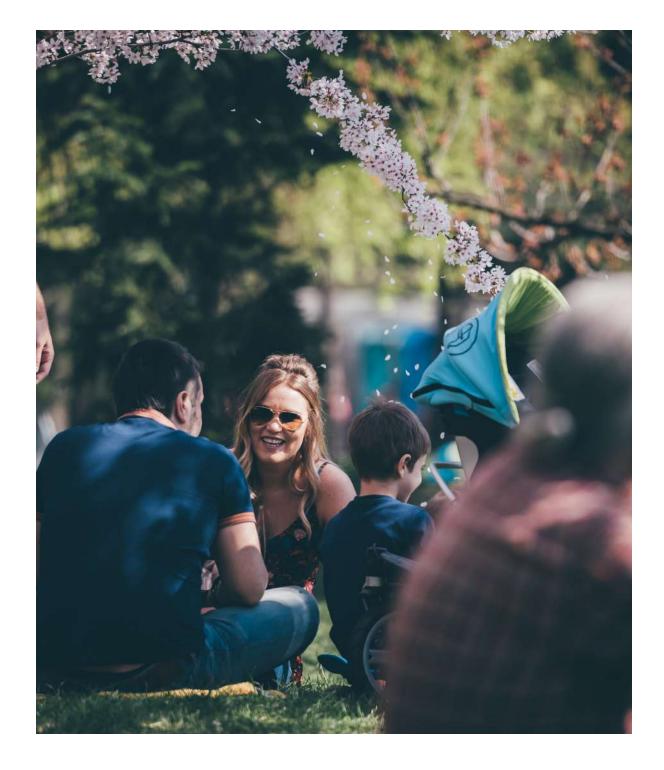
SOUTH STATION PLACE

# Public Open Space

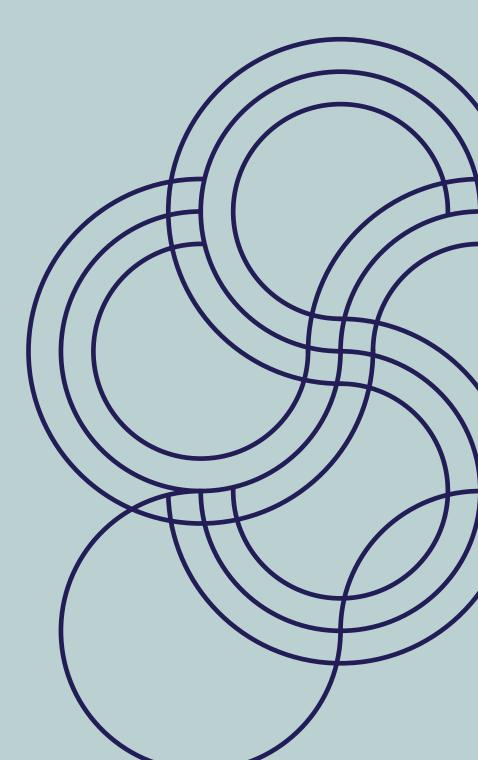
A series of formal and informal green spaces across the site will provide a range of amenity and recreational functions, which will comprise over 45 acres of public open space and woodland for informal use.

The future SSP community will therefore benefit from a vast area of green, open space, which has gained particular importance following the COVID-19 pandemic and the transition to a 'working from home' lifestyle, with a greater desire to be in closer proximity to green space.

In line with the Garden Village principles, ensuring the creation of generous green space within developments will be prioritised across the SSP development. These spaces will comprise of well connected and biodiversity-rich public parks, tree-lined streets and open spaces.



# **10.0 Technical Considerations**



The SSP development framework has been informed by a range of technical assessments and appraisals to understand and demonstrate the suitability of this site for development, comprising:

- Transport Appraisal
- Ecology Technical Note
- Landscape & Visual Greenbelt Review
- Landscape & Visual Technical Assessment
- Flood Risk and Drainage Assessments
- Hydrological and Hydrogeological Risk Assessment
- Preliminary Site Investigation
- Noise Screening Assessment
- Air Quality Assessment
- Socio-Economic Assessment

As demonstrated by the below extracts, these surveys and reports have not highlighted any issues to indicate notable concerns or constraints towards the development of this site. It is in fact clear that South Station Place represents a strong opportunity for an urban extension, which has been tailored to the contextual factors of the site.



### **Technical Considerations**

### **Ecological Appraisal**

Bowland Ecology have completed ecological surveys for the site. The site itself is considered to comprise arable and pasture fields separated by a network of ditches with fields of semi-natural grassland and approximately 11.5ha of birch woodland and mossland. The survey has confirmed the presence of peatland as a key feature of the site and surrounding landscape, with peat bogs considered a vital habitat.

The associated appraisal has confirmed that a strategic approach to development is important to this site, with consideration to be given to:

- The retention, protection and restoration of areas of deep peat
- Ensuring adequate buffering of habitats
- Increasing connectivity for wildlife in the local landscape
- Consideration of the sites context with nearby international, national and locally protected wildlife sites.
- Ensuring that appropriate measures are identified to protect and enhance existing species interests of the site.

#### Flood Risk and Drainage Assessments

An assessment in respect to flood risk at the representation site has been prepared by Hilson Moran. Large parts of the site had, until recently, been identified on the Environment Agency Flood Map as being within Flood Zones 2 and 3. However, as part of a modelling update for the Manchester Ship Canal, the EA removed sections of this covering the M6 and reclassified it as Flood Zone 1 (this included large portions of land within the southern and western areas of the development site). An area of land within the development site, associated with the Fishington Brook remains in Flood Zone 3. In the opinion of our drainage consultant, this remaining area is an artefact from national broad-scale JFLOW modelling of the Brook, carried out in 2004 by the EA, with more recent, detailed and reliable remodelling undertaken in 2006 demonstrating that all of the development site in fact lies in Flood Zone 1. The EA have acknowledged that this later modelling is more realistic of the extent of flooding within Warrington. As such, our consultants are working with the EA to rectify this to remove the identified area of flooding associated with the Brook.

However, it is possible to avoid this area and incorporate it within the SUDS scheme for the site if required.



### **Technical Considerations**

#### Air Quality Assessment

#### A feasibility study in respect of air quality has been undertaken for the representation site by Miller Goodall.

It is concluded that with the implementation of mitigation measures, dust impacts associated with construction are considered to have no residual effects. Nitrogen dioxide, particulate matter and fine particulate matter concentrations are considered likely to be below their respective long-term and short-term objectives at the development site and therefore the site is considered suitable for commercial use.

Further assessment requirements are set out as follows:

- The provision of a Construction Phase Risk Assessment
- Detailed assessment using air dispersion modelling
- Ecological assessment
- Consideration of site design to incorporate non-sensitive uses in air quality areas of concern
- The full air quality assessment will inform the level of mitigation required but this is expected to include a travel plan and incorporation of electric vehicle charging infrastructure

#### Transport Appraisal

A Transport Appraisal Report for the development has been completed by Vectos. The site is considered to lie within an accessible location, owing to its proximity to the M6 Junction 21 and Birchwood Railway Station. The site and proposals for South Station Place pay due cognisance to the schemes and future priorities that are identified in the Warrington Infrastructure Delivery Plan (2021), the Transport for the North Investment Programme and Warrington's Fourth Local Transport Plan (2019).

The transport-led development would comprise a new southern entrance to Birchwood Railway Station and improvements to the public footbridge linking the northern and southern side, alongside improved bus interchange facilities, a 300-space car park, electric vehicle charging points, new cycle parking shelters and rail turn-backs. Such improvements would further increase the attractiveness of rail as a key mode of transport. The assessment recognises the opportunity to improve upon the existing pedestrian and cycle connections in and around the site.

The access options are still under consideration, however an initial access feasibility exercise has been undertaken that presents potential access solutions utilising the land available fronting the A57 Manchester Road. Access to the development via an upgraded Nicol Avenue is also an option that is being considered in detail as part of the masterplanning process. The traffic impact resulting from the development scheme will be assessed in detail at the planning application stage - subject to successful allocation and through working closely with Warrington Borough Council and National Highways, to demonstrate that the development traffic can be accommodated by the surrounding highway network with the appropriate level of mitigation. It is intended that the proposed development will be assessed within the Warrington SATURN model at the earliest opportunity, in line with the emerging Local Plan testing process for strategic development sites and in agreement with WBC. As part of any future planning application, a more detailed operational analysis, using relevant junction models, will be undertaken to assess the impacts of the development trips upon the surrounding highways network.

#### **Ground Investigations**

Surveys of the site have identified the limited presence of peat within the site, as much was removed during the Second World War for use as fuel. It has been determined through assessment by ecology consultants, Bowland Ecology, that areas of peat restoration can be incorporated as part of the landscaping proposals for this development, ensuring that this species rich habitat is retained.

# 11.0 Sustainability Assessment

"Transit Oriented Development is at the very heart and soul of sustainability, and brings together compact, walkable communities with high quality rail systems. This creates low carbon lifestyles by enabling people to live, work, and play without depending on a car for mobility."



### Sustainability Assessment

An assessment of the existing vehicular and pedestrian movement framework and accessibility of the site has been undertaken. The site lies in a highly accessible and sustainable location, and the proposed development offers a unique opportunity to enhance upon the existing modes of public transport and pedestrian accessibility, to promote further sustainable development.

The design process has been, and will be, guided by a number of key principles to deliver the overall goal of sustainable development:

- Enable flexibility and adaptability to respond effectively to the changing environment and lifestyles of residents;
- Create high quality and attractive public spaces that make a positive contribution to local distinctiveness within the area;
- Create an environment that encourages good mental and physical health;
- Optimise the use of natural and local resources during and post construction;
- Enhance the natural environment and biodiversity within the development and wider site;
- Improve the efficiency, competitiveness, vitality and viability of the local economy;
- Reduce inequalities in the built landscape.
- Avoid unnecessary air, noise and visual pollution.
- Reduce waste production and increase reuse and recycling.

 Reduce the need to travel by private car and promote infrastructure improvements and sustainable modes of transport.

The Government is committed to delivering sustainable development, encouraging local planning authorities to promote urban regeneration to improve the wellbeing of communities, promote high quality and safe development and create new opportunities in sustainable locations. There are three overarching elements of sustainable development, as stated in Paragraph 8 of the NPPF; environmental, economic and social objectives.

#### Environmental

The aim of the development is to create a highly sustainable, net carbon neutral community for housing, employment, biodiversity, health and wellbeing.

Birchwood benefits from an existing Railway Station upon the Manchester-Warrington-Liverpool railway line. However, the existing access to the Station is inadequate for both pedestrian and vehicular access. The vehicular access route towards the Station is often heavily congested, which has inevitable, negative environmental impacts. In addition, the station itself is not accustomed to the needs and requirements of the modern end user.



### Sustainability Assessment

The transport-led development seeks to open up the southern access to create a railway station that is fit for the 21st century with an extensive park and ride facility, alongside local shops and services and a residential core. The improvements to the railway services and thus the capacity of the Station, will promote and encourage the use of the Birchwood Railway Station as a key mode of travel daily for local residents, employees and visitors alike. The Station is already served by a number of bus services to access the wider area, and further services will be provided as part of the development scheme.

It is acknowledged that the bus services operating along the surrounding highways network are insufficient, as existing. The proposed development offers an opportunity to upgrade the facilities as part of its sustainable transport strategy and reduce the reliance on private transportation.

The development will also promote pedestrian and cycle accessibility, with the provision of a new pedestrian access bridge between the existing Railway Station and the new facilities to the south. This will also promote connectivity for the new residents and employees with the wider Birchwood area.

The scheme adopts Garden Village principles to create a sustainable community that provides connectivity within the site area and with the surrounding urban area. The aim of the development is also is to create a scheme that is as nature friendly as possible, whilst creating an attractive place to live. Preserving and enhancing biodiversity will be encouraged as part of the proposed development, via a variety of ecological protection and enhancement measures, given the wealth of biodiversity surrounding the development site.

#### Economic

The scheme will create new employment opportunities, both during the construction period and once operational. The development will require the purchasing of local goods, materials and services. A high priority will be placed on the use of construction materials with a low environmental impact over the life cycle of the development. The specification of construction components for new build elements will focus on responsibly sourced materials for key building elements and as far as possible, thermal insulation will be specified that has low embodied environmental performance relative to its thermal properties.

The proposed improvements and enhancements to the rail services and thus capacity of the Birchwood Railway Station, will improve the accessibility of Birchwood as a destination in its own right, in turn promoting the growth and development of the area. The Station will also act as a gateway to promote the employment opportunities provided at the proposed development site.

In the long-term, future businesses and their employees, along with nearby residents will support local facilities and services, of which are all within walking distance or a short bus journey from the application site. The employment element of the scheme will positively contribute to the vibrant range of industrial premises found in the local area and provide employment opportunities for local residents.



### Sustainability Assessment

#### Social

The development seeks to create an attractive, safe and inclusive environment, which aims to encourage a sense of community throughout. The diverse nature of the type and size of the proposed employment units, promotes diversity and inclusivity as the foundation to community cohesion. This ensures that all businesses and groups in society have access to suitable and affordable accommodation.

Future employees will benefit from a range of facilities and services within the local area, aided by the proposed improvements to pedestrian connectivity and public transport opportunities afforded by the proposed development site, including, but not limited to the following; primary and high schools, supermarkets, local convenience stores, retail and leisure uses.

The site is in a highly accessible location on the edge of the existing settlement of Birchwood and the proposed employment land could provide opportunities for local residents, ultimately strengthening the local skills base. South Station Place Community

### South Station Place Connectivity

South Station Place Workplace

South Station Place Commercial

# 12.0 Construction Charter

### **Construction Charter**

This Development Construction Charter is a commitment by Patrick Properties to deliver wider benefits and opportunities through the construction of South Station place, for the local community.

The principal of this Development Construction Charter is to demonstrate how the local community can benefit from a local development project by identifying opportunities and giving due thought and consideration to the development process, to ensure maximum social and economic value can be delivered through the construction process by reputable developers working with Warrington Council / Local College / Chamber of Commerce and Local Enterprise Partnership, in addition to local community groups. It is hoped that this Development Construction Charter will provide a method of delivering greater economic and social benefits to local communities through the construction of South Station Place.

Patrick Properties is a family owned Development Company, with significant experience in delivering major projects world wide. They work with local authorities / development partners and their client base to provide the highest quality of developments in the Housing, Care, Retail, Employment, Logistics, Leisure and Renewable Energy sectors. Patrick Properties have a long history of active community engagement and employment, and have created apprenticeships and learning opportunities through their commitment to training in all that they do. They aim to make a valuable and long-lasting contribution to the people, communities and local economies that they work in.

#### Method of delivering a Development Construction Charter

This Development Construction Charter is to form a lawful agreement through the planning process between Patrick Properties and the local planning authority. This Development Construction Charter is proposed to be delivered through the construction of South Station Place

#### **Development Construction Charter Key Commitments**

In order to maximise the impact of investment in South Station Place, we aim to create a thriving and diverse economy and reduce our environmental impact on the community. We will deliver a Social Value Strategy based around employment and skills, local labour and social responsibility. We will make a significant contribution to Warrington Council's vision to "secure investment to improve the borough assets and public transport infrastructure links through the creation of high quality jobs, fairness in working lives and practices, accessibility to affordable energy and high quality affordable living"



### **Construction Charter**

Our key commitments through the construction of South Station place are as follows:

- To work with Warrington Councils Social and Economic officers, to secure opportunities and benefits through the construction of South Station Place. Providing sustainable employment and training opportunities
- 2. Job creation for local people; providing full and fair access to all jobs, apprentice, trainee and work experience roles. Creating new apprenticeship positions and supporting the learning / development of existing apprentices.
- 3. Delivering training courses to local people to recognised training and industry standards
- 4. Offering two week work experience placements working with Educational providers to deliver a bespoke Employment and Engagement Strategy, including making links with local Job Clubs across Warrington and the payment of the Living Wage
- 5. Delivering positive local economic benefits;
- Meet local supply chain target by sourcing labour and other services from Warrington and North West region.
- Provide opportunities for local businesses to access procurement contracts which we have available through the project.

- Commit to the prompt payment of subcontractors 100% supply chain payments within 28 days
- Host a Meet the Buyer Event to give an opportunity for smaller local businesses to get access to works on this or our other sites in the North West
- Make a significant contribution through buying local and up-skilling local supply chain partners
- 6. Delivering positive community impacts
- Undertaking a contract launch event to update the community and local partners on the scheme
- Supporting sustainability, by working with local people to co-design community projects linked to the scheme and effective tenancy management, including:
- Making a fund available to invest on a community initiative supported by local people
- Work with local partners to deliver additional community activities, drawing on our existing experience
- Provide access to a dedicated youth employability mentor based in Warrington and a dedicated community worker in Warrington
- Deliver a health and safety talk and careers fair workshop to raise the profile of the industry amongst younger generations

7. Considerate contractor

 By Acting as a considerate contractor by acting in an ambitious but safe and environmentally friendly way. Patrick Properties are proud to ensure the development is delivered through a Considerate Constructors Scheme, implementing a Code of Considerate Practice which ensures that they: care about appearance; respect the community; protect the environment; secure everyone's safety; and value their workforce. All construction parking requirements will be met on site to ensure minimum impact to the local community and transport network. In addition to a car sharing policy for their employees.

8. Engagement with local community and key partners.

• Engaging with the local community and key partners on an ongoing basis, including being accessible pre construction, during and post construction and monitoring and reporting back to local community and groups on the delivery of this Community Charter. We will provide a variety of different engagement methods, building on work already done to publicise the scheme via a community consultation event, a dedicated website and telephone line and other local correspondence

### **Construction Charter**

### Delivering on our Development Construction Charter Commitments

We are committed to both working with partners and being open and transparent to ensure that we deliver on all of the commitments made, as well as ensuring comprehensive, continuous and effective community involvement. This will include regularly monitoring and reporting progress against our commitments to partners (including the local community). We will pulled together an experienced Social Value Team. The team will ensure that there is a long term, positive impact on the local area through the delivery of this scheme and propose to meet with the local authority when convenient to demonstrate the delivery of the commitments made within this document during the construction process.

Patrick Properties wish to develop a beneficial and deliverable Development Construction Charter working with;

**Warrington Council** 

**Local Education Providers** 

**Local Enterprise Partnership** 

**Chamber of Commerce** 

**Local Community Groups** 

### Councillors

We are keen to ensure that the actions and commitments within this document reflect local priorities, and would be happy to discuss further.





## 13.0 Timescale

### **Delivery and Timescale**

Subject to allocation, a full planning application will follow almost immediately, within 6 months. Following this, we would plan to deliver the development of this site within 1 to 5 years.

Being the key driver for the proposal, the link road, park and ride and wider station enhancement works will be built out as Phase 1, prior to any of the wider enabling development being sold.

A detailed timeline in respect of the development of this site is set out below.

Following submission of these proposals, it is the intention that successful allocation in the emerging Warrington Borough Council Local Plan will be successful in 2022, whereby a full design team would be appointed, and detailed design works would commence. Following this, it is anticipated that detailed designs for South Station Place would be agreed by October 2022, enabling the commencement of procurement for the SSP and highways works. By January 2023, we intend to have all procurement and contractor appointments complete, prior to the completion of detailed design and full planning approvals, allowing for construction commencement by April 2023. Upon completion of the Highways works, it would be the intention that South Station Place will open, enabling the operation of the wider site by June 2024.

Although conversations with both key Councillor's and various Council Officer's have suggested there may be justification for a planning application at this site on the basis of very special circumstances, in respect to the benefits of the enhancements to Birchwood Railway Station, it is the preference of the development partners and wider project team to continue with promotion in the Local Plan.



We would like to thank the Council for their consideration.

Patrick Properties remain committed to working with all parties to deliver this significant transport-led, public infrastructure development.

