

# 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:** Alban Cassidy

**Email address:** [REDACTED]

2. What type of respondent are you? Please select one option only.  
If you are an agent please select the type of client you are representing.

A Developer / Landowner

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	Patrick Properties
<b>Agent name (if applicable)</b>	Cassidy + Ashton
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

## 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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 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'.

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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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'.

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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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'.

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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>	X	
<b>Compliant with the Duty to Co-operate</b>	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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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 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 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'.

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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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
<b>Legally Compliant</b>	X	
<b>Sound</b>	X	
<b>Compliant with the Duty to Co-operate</b>	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 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).

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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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'.

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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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 severe 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'.

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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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	No
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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'.

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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

	Yes	No
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>	X	
<b>Compliant with the Duty to Co-operate</b>	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.

	Yes	No
<b>Legally Compliant</b>	X	
<b>Sound</b>	X	
<b>Compliant with the Duty to Co-operate</b>	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.

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.

	Yes	No
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

	Yes	No
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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 - [Download](#)
- File: South Station Place Framework Document Appendices 2A of 2.pdf - [Download](#)

**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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.

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).

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.pdf - [Download](#)
- File: South Station Place Framework Document Appendices 2 of 2.pdf - [Download](#)

**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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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 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
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	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.



