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## **Strategic Planning Board**

**Date of Meeting:** 11 July 2019

**Report Title:** Crewe Hub Area Action Plan – Development Strategy and Further Options

**Portfolio Holder:** Cllr Toni Fox - Planning

**Senior Officer:** Paul Bayley, Director of Environment and Neighbourhood Services

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### **1. Report Summary**

- 1.1. This report seeks approval to consult on the next stage of the Crewe Hub Area Action Plan (CHAAP). The Plan is designed to guide and manage development in the environs of the new HS2 Hub Station at Crewe. The proposed consultation is on a series of 'preferred options' relating to both policy and land use configurations. Much of the document sets out the Council's preferred options on these issues. It also seeks feedback on a series of route options for a 'Southern Link Road Bridge' as part of the wider Transport Strategy for the CHAAP. Responses to this issue will inform the selection of a preferred option on this matter.
- 1.2. The CHAAP has been the subject of two previous consultation events the first being a four week 'issues consultation' during November and December 2018, with a series of local engagement events. The second consultation event was a six week consultation on a CHAAP 'development strategy' and parts of the emerging evidence base during February and March 2019. The general area of interest for a Southern Link Road Bridge was explored in the second consultation.
- 1.3. Alongside further evidence, feedback from these consultations has helped shape a 'preferred options' draft CHAAP which represents the next stage of developing the Area Action Plan ahead of a final submission version.

- 1.4. Importantly the CHAAP Development Strategy and Further Options includes a series of route options for the delivery of a Southern Link Road Bridge crossing the rail line south of the station and connecting Gresty Road and Weston Road. These will be presented alongside proposals for other additional highway and transport improvements.

## **2. Recommendations**

- 2.1. To consider the summary of responses to the Crewe Hub Area Action Plan: Development Strategy as set out at Appendix 1.
- 2.2. To recommend that the Planning Portfolio Holder approves the CHAAP Development Strategy and Further Options attached at Appendix 3 for consultation under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

## **3. Reasons for Recommendations**

- 3.1. The proposed consultation forms part of the engagement and consultation phase of plan making that will inform the Council's final 'publication' version of the Plan which in due course will be submitted to Examination.

## **4. Other Options Considered**

- 4.1. The preparation of an Area Action Plan is discretionary; the Council could simply opt to manage development as best it can with existing policies. However this is unlikely to provide the clarity and strategy appropriate for managing an area of rapid change and opportunity.

## **5. Background**

- 5.1. The Local Plan Strategy recognises the importance of Crewe Station as a Transport hub – but it does not plan directly for the implications of HS2 and acknowledges that a more detailed Area Action Plan might be necessary in the future. The Local Plan Strategy is a pre-HS2 document and if the Council is to manage the change associated with the new station, and the increased connectivity at Crewe through high speed rail, it needs to have a robust and up to date development plan in place which addresses the additional development directly associated with the station.
- 5.2. Via the Local Development Scheme, the Council, through its Strategic Planning Board and Portfolio Holder, agreed in August 2018 to prepare an Area Action Plan for the Crewe Hub Station and its environs. The Area Action Plan will have a very narrow geographic focus, being

confined to the area close to Crewe Railway Station to plan for economic growth emerging from the increased connectivity.

- 5.3. The Council continues to campaign for a full HS2 station (enabling north and south connections) to be provided in the town, in order to maximise the opportunities for inter-regional connectivity and economic growth. The Plan is conceived as a means of managing and coordinating the significant change likely to arise from the Government's investment in HS2 at Crewe.
- 5.4. Since the autumn of 2018 the Council has gathered additional evidence and sought the views of stakeholders on a range of issues associated with the delivery of a HS2 Hub Station at Crewe. This has enabled key development principles to be drawn up for the area Action Plan. The strategy is supported by Sustainability Appraisal and a number of evidential documents; these are accessible [here](#).

#### **The Form of the Crewe Hub Area Action Plan Development Strategy and Further Options**

- 5.5. Firstly, building on previous work, the CHAAP Development Strategy and Further Options selects a proposed plan boundary. Unlike all other development plans which match the boundary of Cheshire East as a Planning Authority (the Peak District National Park having its own planning powers) a fundamental choice for the Area Action Plan is how far it should extend. In simple terms the wider the area covered, the more comprehensive it will be – but equally the more issues that will be provoked and the longer it will take to prepare. Conversely a more confined plan may prove more agile but also may fail to address all of the development implications of the enhanced station. Accordingly it is recommended that a balance is struck between these two positions and a preferred boundary is set out in the document. The boundary includes land west of the rail line to Gresty Road in the south and to Mill Street in the north west and extending north east to Macon Way, south east across Second Avenue to Gateway.
- 5.6. Secondly the CHAAP Development Strategy and Further Options sets out a series of key policy principles for the Area Action Plan which all new development would be expected to adhere to. These include:
  - Improving accessibility to the Crewe Hub Station
  - Facilitating transport interchange
  - Improving Linkages between the Town Centre and Station

- Maximising the opportunities derived from 5-7 trains per hour
- Integrating development around the station with the rest of Crewe
- Safeguarding Crewe's Railway & Built Heritage

5.7. Thirdly the Strategy sub-divides the Plan into six development parcels for which a masterplan, detailed spatial policies and principles are drawn up. Foremost amongst these are:

Crewe Commercial Hub / Station Central – The Weston Road gateway – creation of a new main entrance to the station, alongside supporting facilities and transport interchange. Opposite this will be the new Crewe Commercial District – a fresh business location which capitalises on the enhanced connectivity afforded by the upgraded station. This area will be characterised by land mark buildings and higher density development

Mill Street Area – a revamped commercial and residential area focussing on a direct link between Nantwich road and the Town centre via Mill Street Bridge. There are also important heritage assets in this vicinity which require preservation and integration.

Gresty Road Gateway - This area will safeguard a potential future pedestrian entrance directly into the station. There is scope for additional development to complement the retained Crewe Alexandra stadium and improved public realm.

### **Infrastructure & accessibility**

5.8. The enhanced rail service requires significant improvements in accessibility in and around the station. The benefits of HS2 will not be realised if major cities can be reached in minutes by train but grid lock prevails beyond the station entrance resulting in the benefits of high speed rail travel and enhanced connectivity being undermined by poor accessibility. Accordingly, the Area Action Plan must anticipate new and improved transport infrastructure as within the station all passengers are effectively pedestrians and thought must be given initially to the movement of people by non-vehicular modes. Allied to this there will be complementary strategies for public transport interchange, public car parking, proposals to improve traffic management within the town of Crewe and additional highway capacity at key pinch points.

5.9. To help address this, the CHAAP Development Strategy and Further Options builds on the previous Development Strategy to propose a

number of route options for a new high capacity road bridge located to the south of Crewe Station. This will carry through traffic away from the congested station area and enable Nantwich Road to be significantly amended to improve the environment for pedestrians accessing the station – offering the flexibility to allow multi modal improvements on the Nantwich Road corridor.

### **Next steps**

- 5.10. This current CHAAP Development Strategy and Further Options brings together the Council's proposals for the planning and management of development around the Hub Station into a draft Area Action Plan. It reflects many of the matters raised during the period of engagement during the autumn and winter. If approved, Regulation 18 consultation is planned to take place over a six week period between 12<sup>th</sup> July 2019 and 3<sup>rd</sup> September 2019.
- 5.11. Following this it is proposed to move towards a publication draft plan later in 2019, subject to any additional consultation or engagement considered appropriate in light of responses received. The Publication Plan will be the subject of formal consultation (Regulation 19) and will then be submitted to the Secretary of State for Examination.

## **6. Implications of the Recommendations**

### **6.1. Legal Implications.**

- 6.1.1. The Planning and Compulsory Purchase Act 2004 (as amended) requires local planning authorities to prepare Local Plans. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) sets out the procedures to be followed in the preparation of such plans.
- 6.1.2. The Regulation 18 consultation marks the start of the formal engagement stage of the Plan and represents the scoping stage to decide what should be included in the Plan and requires that various bodies, community and stakeholders be notified that the council is preparing a plan. It invites them to comment about what that plan ought to contain.

### **6.2. Finance Implications**

- 6.2.1. The full cost of preparing the Crewe Hub Area Action Plan will be funded from the Councils HS2 Programme budget.

### **6.3. Policy Implications**

6.3.1. The Area Action Plan sets out the Council's policies for the development of land in and around the Crewe Hub Station.

#### **6.4. Equality Implications**

6.4.1. The sustainability Appraisal that accompanies the preparation of the Area Action Plan considers the implications for equalities.

#### **6.5. Human Resources Implications**

6.5.1. There are no direct implications for human resources

#### **6.6. Risk Management Implications**

6.6.1. There are no direct implications for risk management

#### **6.7. Rural Communities Implications**

6.7.1. The Area Action Plan concerns land within the urban area of Crewe

#### **6.8. Implications for Children & Young People / Cared for Children**

6.8.1. There are no direct implications for children and young people.

#### **6.9. Public Health Implications**

6.9.1. Appropriate Development Plan policies can help foster healthier living and working environments.

### **7. Ward Members Affected**

7.1. All Crewe Wards

### **8. Consultation & Engagement**

8.1. The Area Action Plan was subject to a period of engagement during the late autumn of 2018. Consultation on a Development Strategy was held during the February and March 2019. A series of events were held for local businesses and residents alongside an online consultation. A summary of the comments received on the Development Strategy is attached as Appendix 1.

### **9. Access to Information**

9.1. Aside from the supporting information referenced in paragraph 5.4 the relevant section of the Council's [website](#) includes the previous Area Action Plan Issues Paper and related supporting information

### **10. Contact Information**

10.1. Any questions relating to this report should be directed to the following officers:

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## **APPENDICES**

**Appendix 1 Crewe Hub Area Action Plan: Development Strategy – Summary of Responses**

**Appendix 2 Southern Link Road Bridge: Route Options**

**Appendix 3 Crewe Hub Area Action Plan: Development Strategy and Further Options**

**[The documents in the following appendixes can be accessed electronically via this link.](#)**

**Appendix 4 Supporting Documents: Sustainability Appraisal**

**Appendix 5 Supporting Documents: Habitats Regulations Assessment**

**Appendix 6 Supporting Documents: Evidence Base Reports**

## **Appendix 1 Crewe Hub Area Action Plan: Development Strategy – Summary of Responses**

**The below is a summary of responses received in response to the CHAAP Development Strategy. The responses are set out in an order related to chapters of the document.**

### **1. Introduction**

- CEC should object to HSE Ltd about the Handscare Link near Lichfield and about HS2 services to Stafford. CEC should campaign for its cost neutral replacement by the 'Meaford Curve' near Stone.
- The immense cost of HS2 could be avoided by improved rolling stock and ongoing normal track maintenance on the existing system.
- CEC needs to allow improved flexibility of B-class uses at the allocated Basford East site in order to ensure that the future development of the site does not undermine the B1 proposals at the Crewe Station Hub, and the opportunity presented by the site to accommodate the relocation of existing businesses currently located in the AAP area to ensure local jobs and businesses are retained in Crewe.
- Triton Property Fund is the owner of Grand Junction Retail Park in Crewe and is currently working with CEC to help improve linkages between the Retail Park and the primary shopping area in Crewe. To ensure the full potential of HS2 is realised, a greater degree of emphasis needs to be placed on enhancements to access and infrastructure to Central Crewe which also needs to be extended to include the Grand Junction Retail Park.
- There is still some uncertainty on the future of HS2 and it seems premature to base an AAP on something that may not happen.
- The LPS should be revisited rather than spending time and resources on the AAP for Crewe when the implications of HS2a and Constellation Growth Partnership have significantly greater implications for the whole of Cheshire East.
- To plan for 5 HS2 trains from the south and 7 trains from the north is too ambitious and costly. It should not be at the expense of existing regional services. Only 3 trains per hour should be catered for.
- There was no consultation on the Constellation Growth Strategy. Based on the Growth Strategy there is a significant amount of employment and housing growth 'unallocated' in any current Local Plan. By placing reliance on this and failing to revisit the LPS there will be pressure to build on greenfield on the periphery of Crewe (in particular the corridor linking Crewe to A500) leading to the erosion of green gaps and the coalescence of settlements.
- The Strategy offers the opportunity to "realise Crewe's full potential as a regional and national hub through HS2 bringing transformational growth and significant economic and social benefits to the community of Crewe and beyond" (¶ 1.1). However the limited geographical nature of the Strategy undermines this first paragraph of the draft plan.



- The development consent (for Lidl/B & M) has caused problems for the plan because of the large surface car park where the green space was intended. The plan is being pushed forward even though other events are overtaking it.
- HS2 will have a much wider impact than just around Crewe Station. The plan is too restrictive to ensure the appropriate level and mix of housing is provided in Crewe.
- The AAP should clearly state that it only relates to Crewe Hub Station and ensure that development outside the designated area to support HS2, such as housing, is not stifled. Or the AAP should be delayed to align with the review of the LPS.
- Royal Mail owns and occupies the freehold of Crewe Delivery Office and the adjacent car park which lies centrally within the CHAAP designated area. The Delivery Office is critical to Royal Mail being able to meet its statutory duty and operate effectively. Royal Mail's concerns have not been addressed. The Delivery Office is still located within the "Core" boundary, and more significantly the Southern Link Road Bridge is shown to be located on operational Royal Mail land which is a major concern. The GRIP 2 Feasibility report identifies land to the east and west of the bridge alignment is industrial units and businesses which may need to be relocated. Royal Mail has confirmed they have no intention to relocate.
- Remodelling is a railway term usually associated with changing track layout. HS2 requires little work at Crewe Station. Re-modelling is required around Basford Hall Junction south of the station and outside the consultation zone.
- Objection to ¶1.22. CEC is required to maintain an effective and up-to-date Local Plan to support growth and meet future development needs. The LPS is a "pre-HS2" plan since the full details and implications of the major transport proposal are not yet known. It is therefore crucial that before the CHAAP the Local Plan is reviewed to take into account HS2. Having reviewed the Local Plan's growth estimates and data release by the Office of National Statistics, the Local Plan review should be conducted at least eight years earlier than the adopted plan is aiming for without even considering the growth by HS2. The annual growth rate in CE employment is significantly higher than the target growth rate of 0.7% per annum in the Local Plan. If job numbers continue to grow at the same rate they have done between 2015 and 2017 (2.3% per annum) the target of 228,000 jobs will be achieved by 2022.
- The CHAAP must be agile and flexible to support growth planned. It must also improve the accessibility to Crewe Hub Station; improve linkages between town centre, retail park and the station; promote and accommodate 5-7 trains per hour; integrate development around the station and the rest of the area; and safeguard Crewe's Railway and Built heritage.

## **2. Key Assumptions**

- The four key assumptions are focused around the 'delivery' and various aspects (vision, objectives, growth aspirations, Crewe commercial hub and improved connectivity) which are supported as it implies the Council are taking a positive approach to delivering the Crewe Hub.

- Assumption 2 (Delivery of Growth Aspirations) is supported as it clearly sets out CEC's intention with regard to housing delivery and the creation of jobs in and around Crewe.
  - The arrival of HS2 will provide great opportunities for growth and regeneration but at the same time will need to assess the impact on local infrastructure and the environment.
  - To maximise the potential for growth, the CHAAP should include a greater focus on connectivity with existing assets. This accord's with the strategic objectives within the NPPF and development plan which seeks to make effective use of land and assets, particularly those in sustainable locations.
  - To ensure full potential of HS2, a greater degree of emphasise needs to be placed on enhancements to access and infrastructure to Central Crewe.
  - The LPS and SADPD, which were used to inform housing targets, have not fully addressed the implications of HS2, and the housing numbers are not sufficient to fully capitalise on the demand from the HS2 investment.
  - The Gresty Lane site represents a deliverable site that can progress towards a full application to help address the housing shortfall and demand from HS2.
  - The delivery of town centre housing (expected to be apartments) will not allow for well needed family housing. It is paramount that the promotion of housing through the Strategy does not undermine the ability for sustainable, suitable and deliverable housing sites to come forward to meet such need.
  - It is not clear how the delivery of 3,750 homes will be generated through the Crewe Commercial Hub as suggested at ¶2.6. Evidence needs to be provided to clarify how these numbers will be delivered. The Strategy must clearly caveat that it is accepting of the fact that growth expected from HS2 cannot be expected to be accommodated within the Strategy area alone.
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- Assumption 3 (Delivery of the Crewe Commercial Hub) - a "strongly office-led development" as suggested at ¶2.9 could potentially further undermine the town centre and would conflict with town centre first approach. What assessments have been undertaken to indicate that new office development would pass relevant assessments?
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- Assumption 4 (Delivery of Improved Connectivity) - Crewe has issues with traffic congestion, constrained by Victorian railway bridges and road network. If funding to improve infrastructure is not forthcoming the proposed development of 7,150 apartments would exacerbate the traffic issue. Lower density housing located outside of the CHAAP (such as the Gresty Lane site) would alleviate traffic concerns.
  - It's a shame only "pedestrian focused routes" has been mentioned (¶2.12) rather than routes for cyclists. Most housing, and almost all new developments are too far away to walk, but within comfortable cycle commuting distance. CEC Cycling Strategy emphasises the importance of these routes.
  - It would be interesting to see how a green link (Figure 2.1) is delivered by the Strategy. Physical constraints to the north would hinder the desirability of the route and by the recent approval of the Mill Street/Lockitt Street development (18/5040N).

- An “increased focus on public transport, pedestrian and cycle access to station” (¶2.12) is supported. However the “delivery of multi-storey parking at multiple locations” (¶2.12) is opposed, in particular at Weston Road entrance.
- “A southern link bridge: this infrastructure is intended to enable greater network capacity through Central Crewe” (¶2.12) – this does not seem to affect what people of Crewe would consider to be Central Crewe, although it has a massive impact on Crewe South.

### **3. Emerging Issues**

- A key issue to raise is security – these trains will be operating at high speeds so will be vulnerable to sabotage so adequate security screening and surveillance must be in place at the station.
- An area for existing emergency services needs consideration and careful planning.
- Maintenance costs should be considered when designing the structure of the building. One thought is to incorporate solar panels into the structure. Other areas that need consideration is to do with climate and the impacts on station design and passengers being able to get to/from car parks.
- The CSHAPP does not plan for enough homes, of the right kind, in the right places. There is an ageing population in Crewe (¶3.2). High density housing will appeal to mainly young professionals. The CHAAP does not therefore adhere to the NPPF which requires that “plans should positively seek opportunities to meet the development needs of their area.” The Gresty Lane site should be incorporated into the Basford development area to help provide a variety of housing for the wider population.
- Historic England welcomes the commissioning of a Heritage Impact Assessment and agrees with the assessment of significance set out in ¶3.7.
- Objection to the Southern Link Bridge (¶3.9). Implications for residents of the homes in Gresty Road and South Street are barely mentioned, road widening would require demolition of homes. By referring to Laura Street as the desired area of the junction on Gresty Road there is the implication that Manor Way is being viewed as an alternative route from Wistaston. Manor Way is not able to accommodate an increase in traffic flow.
- There will be an increased risk to local safety. Manor Way is used by local residents daily accessing local schools by foot/bike and bus routes to Nantwich schools. The area is also popular for walking/cycling for residents accessing local businesses, bus stops and railway stations. Pebble Brook School is at the bottom of Manor Way and is already congested at peak times.
- The bypasses developed in the last few years were to reduce traffic accessing Nantwich Road, and whilst this has resulted in a reduction in traffic to some degree it has not achieved

the desired effect. How can we assume a further bridge will reduce traffic along Nantwich Road?

- Traffic on Nantwich Road has seen a noticeable reduction since the opening of the David Whitby Way. There is immediate scope to improve pollution without major investment.
- There is still bottleneck around the railway station pelican crossing which has never worked for pedestrians or traffic, but since Nantwich Road station entrance cannot be retained in the new design, due to security concerns, they can be removed and replaced by one zebra crossing at a better location.
- Loss of traffic along Nantwich Road could impact business revenue for local businesses located along Nantwich Road.
- “Crewe is well served by bus routes” (¶3.10) is inaccurate. Crewe has a terrible bus service with few routes operating outside of 07:00 -19:00.
- ¶3.11 is misleading mentioning pedestrians and cyclists but then only mentioning facilities for pedestrians. Currently Crewe town centre is not open to cycling, but allowing cycling is strongly supported.
- Cycle routes in the area around Crewe town centre needs to be improved as recommended in Cheshire East Council’s “Crewe Cycle Network Masterplan”. This involves creating good cycle routes connecting to Tipkinder Park; Northwest end of Leighton Greenway to Leighton Hospital; Southeast end of Leighton Greenway to Crewe Town Centre; Crewe Railway Station to Crewe Town Centre.
- Cycle routes are hindered by pedestrianised streets because provision for safe shared use was never made.
- ¶3.19 sets out that “a housing strategy is being developed to instigate the approach to delivering residential development...” This must be made available for public consultation. There is a disagreement with the assumption that because Crewe has smaller household sizes then the borough average, a requirement for smaller property types may be needed. Similarly, current low car ownership rates suggesting the potential for higher densities of development is disputed. The Strategy should promote additional family housing within other higher value areas of the town.
- The Strategy should incorporate flexibility to ensure that it does not stifle suitable and deliverable housing sites coming forward and should even go as far as identifying potential sites to accommodate the growing need. Potential sites include – Land to the rear of Hunters Lodge Hotel, Crewe; Land south of Bradeley Hall Farm, Crewe; Crewe Road, Winterley.
- The comment for the development of the former Gorstyhill golf course in Appendix 3 was rejected by the Parish Council through the Neighbourhood Plan, through CE Local Plan and by the secretary of state through a public enquiry. How can the landowner keep offering up this site when it has been rejected at each and every stage?
- ¶3.19, refers to “low car ownership rates.” Has DVLA statistic been used? The Bentley employee car scheme means that a significant proportion of residents use cars leased at discount rates but don’t actually own them.

#### **4. Area Description**

- Grand Junction Retail Park should be included within the definition of ‘Central Crewe’. The Retail Park performs an integral role in the commercial offer and wider function of Crewe town centre.
- The boundary will need to be fluid and flexible in order for a relationship to be established between the future development and that which is established.
- The boundary should not be limited to the location of key infrastructure of development. Instead the boundary should reflect the relationships between the proposed development and the existing communities. This includes the communities who will benefit and be affected by development to the North and West of the station, but also emerging communities within Basford East and West (strategic locations for growth).
- To use the name ‘Central Crewe’ to describe the area is likely to cause confusion. It is neither town centre, as known to residents, nor is it the CEC Crewe Central Ward. Much of this area is in the East and South wards whilst parts of Central Ward are not in this area.
- To “rationalise the road hierarchy” mentioned in ¶4.6 is not clear and worrying – assume it means increasing road capacity for cars?
- Reducing vehicle access through the town as mentioned in ¶4.6 is supported, but it needs good integrated public and active travel options.

## 5. Vision

- There is general support for the vision which seeks to maximise the potential for growth through the delivery of HS2 and a new station hub.
- The vision should be aspirational and ambitious, creating an environment for the private sector to prosper for the good of the local community.
- The vision should reflect the associated environmental benefits associated with a large sustainable transport infrastructure plan including reduced air pollution and biodiversity gain.
- The vision makes no reference to present or future residents. It should spell out what is hoped for investment and physical development will do for the community. This must include reference to how Crewe residents will benefit for example through improved housing, job opportunities, environment, leisure provision, living spaces and improved air quality.
- The AAP is vital with regards to the economic benefits and opportunities that will arise, and it is essential that it is broad and ambitious, which currently it is not. An extra bullet point to the vision should be added to discuss the knock-on impacts/effects HS2 will have on the wider area.
- Is there any case study evidence that the arrival of High Speed rail in towns of our size in Germany or France achieved growth like this?
- The AAP does not contain any recognition or consideration of the value of existing business to the economy of Crewe and the success of the future Crewe Station Hub Area. This is contrary to ¶182 of the NPPF. The Council should acknowledge the importance of Royal Mail

and MECX as an employer and strategic operator, and the need to ensure the long-term retention of the asset for Crewe and the wider CW postcode area. Alternative locations for the Southern Link Bridge should therefore be considered.

- Objection to ¶5.6 which states “the local highways network will see significant investment in infrastructure, capacity and parking facilities.” Increasing road space is unwise as many studies show that more roads generate more driving.
- Objection to ¶5.7. How can you “improve the amount and quality of new and enhanced public realm and green spaces”, and “increase infrastructure, capacity and parking facilities”. Take a look at what they did in Groningen.

## **6. Plan Objectives**

### **Objective 1 – Crewe Commercial Hub**

- The objectives would be supported if it is clear that they are intended to deliver a vision which includes improving the quality of life for existing and future local residents, and businesses of Crewe.
- The primary objective of development in the AAP area should be to create employment uses.
- Objective 1 is supported. It is essential that national retailers and flagship companies should be encouraged to move into the area, which would lead to the knock-on effects and would encourage other companies and businesses to invest in the area.
- To support the growth that HS2 will bring, the Council should reconsider the Garden Village concepts well beyond the AAP area – and not just those considered through the Local Plan Examination – in particular to create communities and housing that suits the work force required to support growth industries.
- Objection to "supporting improved transport infrastructure..." (¶6.7). It is unwise to increase road capacity for cars.
- Objection to ¶6.9. The paragraph should be changed to “new and improved pedestrian AND CYCLIST links between the town centre and the HS2 Hub Station”.

### **Objective 2 - Connectivity**

- The Gresty Lane site is in a sustainable location well positioned to adhere to the CSHAPP objective of delivering improved connectivity.
- Strongly support the concept of stopping more HS2 services at Crewe (¶6.14). Without good connections, the benefits of HS2 will not be spread so widely.
- The AAP is far too narrow and it is absolutely crucial to local economic growth in Cheshire. The design of the Crewe Hub needs to allow for sufficient local train services to call. There is a lack of platforms in general and in particular of bay (terminus) platforms accessible from the Manchester direction. It is essential for the AAP to require new platforms to be in place to provide growth before the earlier completion of Phase 1 and the commencement of construction of Phase 2a.
- Crewe North Junction - It is imperative that the North Junction is completed in time for HS2 Phase 2b operation and the AAP should emphasise and allow for this. The objective should

therefore be updated and expanded to cover the full requirements of the new platforms, the Mid-Cheshire Rail Link and the North Junction.

- To ensure that the potential for growth generated by HS2 and the Station Hub and the elements of the Vision are realised, it will be necessary to deliver greater enhancements to infrastructure. A greater level of improvement schemes should be considered to other local commercial areas to create greater cohesiveness around Crewe's wider town centre. In particular the CHAAP should include provision for: 1. Roads to the north of the town centre, including Earle Street, are also in need of upgrading to enhance the functionality of Central Crewe. These works should be considered as part of the wider works to deliver HS2 and the Station Hub area through cross funding or Community Infrastructure Levy; and 2. Significant improvements to pedestrian and cycle infrastructure should underpin the Strategy in order to address connectivity issues and minimise congestion and the reliance on private modes. This should include direct links to Grand Junction Retail Park and the commercial areas along Macon Way and the areas of the town to the north east.
- Having the "Nantwich Road entrance reconfigured with a focus on pedestrian, cyclist and public transport" (¶6.16) is unnecessary and at odds with Department for Transport security rules.
- Creating a new southern link road (¶6.18) is unwise as new roads generate more car traffic.
- Whilst there is a Bridge Feasibility Report provided as Appendix 4 to the Strategy document, there is no information provided regarding the effect of the proposed Southern Link Bridge upon traffic movements in the area. Vectos have sourced some traffic data on behalf of Esso Petroleum Ltd to understand the effect on Crewe Arms Service Station – this shows Nantwich Road and Weston Road experience the greatest traffic flows of all the arms of the Crewe Arms roundabout. Diverting traffic between these two roads via an alternative route will result in a significant reduction in traffic passing Crewe Arms Service Station. More detailed information is required regarding the effects of the proposed Southern Bridge Link and also that on Nantwich Road, to enable a better understanding of the likely effects of this upon passing trade at the Crewe Arms Service Station.
- The need for a new southern link road bridge has not been proved. CEC cannot have accurate figures for Nantwich Road traffic with David Whitby Way open and Sydney Rd open and improved since that project will not be ready for a few more weeks. It will then take some months for traffic flows to settle down into their new patterns.
- The Southern Link Bridge will require Royal Mail and MECX and its other tenants to relocate. Royal Mail strongly opposes this.
- Locomotive Storage Ltd occupies the 10 acre Crewe Diesel Depot site south-west of Crewe station. Concern is raised on how the proposed Southern Link Road overbridge, crossing the northern end of the depot, will affect business. Locomotive Storage Ltd cannot contemplate any bridge abutment, or similar structures, being placed within their long leasehold which would severely curtail present and future railway operations.
- "Wider improvements and investment in the local highways network to upgrade junctions, roundabouts and capacity" (¶6.19) will merely draw more traffic. Other towns are creating modal filters, cutting roads and narrowing them (even in Crewe, e.g. Minshall New Road and West St).



- Change ¶6.19 "g Vastly improving the pedestrian experience to, from and around the HS2 Hub Station in terms of pedestrian and cyclist priority, accessibility, safety and comfort " to "g Vastly improving the pedestrian AND CYCLIST experience to, from and around the HS2 Hub....."
- "Establishing new primary routes for cars" (¶6.20) and "delivering increased parking capacity" (¶6.21) will increase driving.
- "Promoting sustainable travel options" (¶6.22) is supported through there needs to be challenging targets. The latest Crewe Station Travel Plan was extremely weak, simply aiming to maintain the small number of people arriving by bicycle rather than increasing it significantly.
- Past experiences of promoting sustainable travel options is not good. CEC have never promoted the Cheshire Travelcard despite it being valid on buses in this area. Given that CEC cannot fix the bike pump on platform 5, considerable convincing is required that this is a serious aspiration.
- New and improved pedestrian and cycle links (¶6.24 and ¶6.26) is welcome through building high quality or at least to standard guidance is important.
- Providing new and improved pedestrian links to the town centre (¶6.26) seems thwarted by the recent approval (18/5040N), where one of the suggested relatively narrow pathway connections to Mill Street is alongside the proposed supermarket. This is not an inviting route.

#### Objective 3 – Sustainable Development

- Support for Objective 3: Sustainable Development.
- The CHAAP should include a significant increase in improvements to infrastructure and connectivity to create a town centre with greater cohesion. Improvements in sustainable links will also help reduce reliance on private modes for movement around Central Crewe and the Station Hub; consistent with the overarching objective to deliver sustainable development.
- The Strategy area should to be expanded given the impact HS2 will have on the whole Borough, particularly in terms of the anticipated increase in population growth. The Strategy should incorporate flexibility to ensure that it does not stifle suitable and deliverable housing sites coming forward and should even go so far as identifying potential sites to accommodate the growing need- Land to the rear of Hunters Lodge Hotel, Crewe; Land south of Bradeley Hall Farm, Crewe; Crewe Road, Winterley.
- The boundary of the Strategy area should be enlarged to encompass key sites to support the deliverability of family housing. If this is not feasible, the Strategy needs to be revised to remove the reliance on housing delivery within the area only. Based on the available evidence, it is difficult to see how CEC can deliver sufficient housing within the urban area of Crewe to meet the growth requirements of HS2.

#### Objective 4 – Environmental Quality



- Objective 4 contains very little on the natural environment. Natural England would like to see something included around habitat creation (biodiversity net gain) that links in with HS2's Green corridor concept.
- Sustainable drainage is an integral part of improving the environmental quality of an area. The existing drainage system in the area is largely dominated by combined sewers which take both foul and surface water, and the combined networks include several overflow points that are permitted by the Environment Agency. The purpose of such overflows is to prevent network flooding by discharging into a nearby watercourse at times of high flow. If surface water entering the sewer network is significantly reduced by discharging to more sustainable forms, it subsequently decreases the discharges from such overflow points. This will result in the discharges occurring less frequently, possibly not at all, with resultant environmental improvements for the wider environment. United Utilities recommends the following addition to Objective 4: *"6.41 Creating a sustainable solution to the water environment as a result of new development."*
- Given that car tyres are by far the greatest cause of ocean micro plastic pollution everything should be done to cut down vehicle movements, especially given the nearness of the brook and flood plain.
- Support Objective 4 which aims for "outstanding station design" (¶6.33). Aspiration for the design of the Crewe Hub Station should be taken from the design of Kings Cross station in London. The transformation of King's Cross Station for Network Rail involved three very different styles of architecture: reuse, restoration and new build. The train shed and range buildings had been adapted and re-used, the station's previously obscured Grade I listed façade had been restored, with a new, highly expressive Concourse that had been designed as a centrepiece. The images shown to date of both the station and public realm lack inspiration and charm and create spaces that feel inhuman and unlikely to age well. Design and materials are essential to the success of the AAP and need a significant revisit.

## **7. General Development Control Policies**

- The General Development Policies are generally supported.

### GD1 – Policy Hierarchy

- Support for Policy GD1, recognising that the policies within the Area Action Plan (AAP) will take precedent ahead of the policies within the CELPS should a conflict arise. An alignment between the Strategy and the adopted Local Plan is encouraged, so as to be in conformity with the NPPF, but also to ensure the strategic and detailed policies outlined within the Local Plan are not lost within the AAP document. The AAP should be an extension of the LPS as opposed to a separate document.
- Morning Foods objects to Policy GD1 whereby the policies and proposals of the AAP will take precedence over any Local Plan; specifically, outside the 'core' and 'primary' areas. The AAP covers over 150 acres of what is currently the "Crewe Gates Industrial Estate". The AAP is therefore directly opposed to the continuing development of, and investment in, the existing

uses of many successful local businesses. Nowhere does the AAP support the activities of, or provide an alternative location for these existing industrial users.

#### Policy GD2 – Supporting the development and maximising the opportunities of the Crewe Hub Station

- Support for Policy GD2, recognising that the areas closer to the Crewe Hub will gain from the proximity. It should also be noted that additional communities, of greater distance from the Hub, will still benefit from this location. The development opportunities and improved transportation links will provide benefits across Crewe and to the wider Borough.
- It should be noted that 'locational advantages' are not limited to areas within the immediate vicinity. Although land to the West of Crewe Road and South of Gresty Lane may not be considered to have 'locational advantages' as stated in the Strategy, the improved pedestrian and cycle route to the station and the proposed future development along Gresty Road means that even though this site is considered to fall outside of the CHAAP boundary, it still benefits from its proximity to the Crewe Hub. It is crucial to the development of the CHAAP for the Council to recognise the need for fluid and flexible boundaries in order to provide sufficient growth and foster better connections between the Crewe Hub and existing communities.
- The design of the Station is critical to maximise the benefits of investment locally. The Station must be of a high quality design building on the heritage locally, and that all development locally facilitates its function as a high quality, accessible location. The Hub also has the potential to be a destination in its own right, with the development of conferencing and meeting spaces to serve Crewe and major employers. There are also opportunities to bring new ways of working and build a community at the Station, through flexible workspaces, incubators, and other innovative models.

#### Policy GD3- Facilitating New Infrastructure

- Natural England notes air quality impacts, as a result of increased traffic, has been recognised. Roads within 200m of a designated site that is sensitive to air quality need to be included in any future assessment. This initial level of assessment could perhaps have been included at the Screening stage. The HRA does not refer to hydrological pathways that could be impacted at the development stage; evidence of this consideration should be presented in the HRA. Natural England agrees with the overall conclusion that further assessment of air quality impacts on West Midland Mosses SAC is required.
- Support for Policy GD3, recognising the importance of transport and digital infrastructure within new development. However, more detail needs to be provided regarding the types of infrastructure required and the reasoning behind this, as high infrastructure costs will need to be taken account of at both concept and detailed viability stage. In addition, the policy wording states that "all new development" shall make provision for new infrastructure, therefore more detail needs to be provided on the specific types and location of development that qualifies for making this contribution. CEC will need to provide further and more detailed information regarding this and how such proposals will align with the recently adopted CIL charging schedule.

- The facilitation of new infrastructure is the foremost benefit of the HS2 expansion to Crewe. Investigation would be welcomed into multi-modal solutions (e.g. park and ride), especially as the densities in the area increase and to service major employers and employment areas such as Crewe Business Park, the Science Corridor, and Bentley Motors.
- Infrastructure should maximise opportunities for energy generation, for example through car park solar canopies, and minimise embodied energy in construction and design wherever possible, including utilising the current PAS 2080.
- The intention for a Southern Link Bridge is noted and agreed. It is suggested that this is an ideal conduit for protected ducting to carry necessary infrastructure (including digital) across the rail lines in a manner that is accessible and economical. The specific reference to digital infrastructure is welcome. The Skills and Growth Company would like to explore with CEC how to accelerate deployment of digital technologies (fixed line and wireless), potentially beyond Local Full Fibre Networks and IOT, and even 5G. It is also important that new infrastructure realises the benefits of digital improvements. CEC should prioritise and maximise the use of Smart technologies within the fabric of the development. PAS 184 could be referenced as an approach to take.
- A major infrastructure development area such as the one proposed will carry with it substantial electricity and heat demands and will necessitate upgrades to the networks in order to facilitate these. This is an area in which CEC can take a strong leading position in order to facilitate the best development options for the area and that ownership of network upgrades being in local authority control has the potential to offer long term benefits to an area of importance within the borough.
- The development of local heat and power networks as an important part of improving sustainability in the area and as an enabler for growth and development is encouraged.
- The development of the station itself provides the opportunity to facilitate the low-carbon growth ambitions of Crewe. This can be both in the design of the station itself, with the inclusion of solar panels and heat pumps, and also the use of the station building as a means of facilitating the crossing of the rail lines for pipes and cables which will enable a heat network to be created around the station. Reference should be made to the existing model of New Street Station, Birmingham, which houses the energy centre for, and acts as the anchor for a large heat network within the city centre.

#### Policy GD4 – Improving Linkages between Town Centre and Station

- There is a conflicting message in ¶7.11 -"The Plan seeks to support the on-going regeneration of the town centre, in particular, through contributions to the creation of a new pedestrian link between the hub-station and town centre" (cyclists not mentioned); and "particular emphasis given to better and more direct pedestrian and cycle access" (cyclists mentioned). It is suggested that both elements should be aligned.
- Improving the linkages between the town centre and the station is an area of significant importance to Crewe. A high quality, safe, pedestrian and active travel route is vital to support the integration of these two locations. Regard should be given to both the requirements of the day-time economy and furthering the night-time economy in the design

of this route, encouraging high levels of interaction and activity, and providing for natural surveillance and mixed use in this area.

- Regard should be given to accessibility and design for those with limited mobility. Regard should also be given to the linkages to the retail park facilitating non-car accessibility to support combined trips linked to the leisure offer in the town centre.
- Improving linkages now suffers from the recent approval at Land at Mill Street/Lockitt Street (18/5040N).

#### Policy GD5 – Facilitating Transport Interchange

- Support for Policy GD5 to create a modal shift away from the use of private vehicles and towards the use of more sustainable forms such as public transport or pedestrian methods.
- CEC should be encouraged to consider the impact of this transport interchange on the wider network and also to consider existing and future linkages to the Station Hub as this may need to be factored into any detailed design or deliverability work. This links directly with the requirement for the AAP to be fluid and flexible in its definition of boundaries so it encourages and enables infrastructure delivery across the wider network.
- Facilitating transport interchange will be a vital area given the geographic footprint of those who will be using the hub station. This should take into account the future mobility options emerging, especially the integration of electric vehicle charging, the wider mobility as a service approach, and the emergence of smart technologies to facilitate ease of access. Existing and new businesses would likely benefit from the availability of park and ride options, and this could become more important as densities increase. Although still in development, it is probable the Connected and Autonomous Vehicles will be operating in this area given the high footfall, and the plan needs to have the flexibility to accommodate them.

#### Policy GD6 – Infrastructure Costs

- Support for Policy GD6 which prioritises pedestrians and cyclists in the road hierarchy.
- The principle behind this policy is accepted but more detail is required. It is not uncommon for Councils to seek contributions from developers for pieces of key infrastructure the scheme is dependent upon. However, it is important for CEC to clearly define the infrastructure needed and the scope considered.
- Strongly support a public transport strategy which reduces the need to travel by car, successfully connects the station to wider Crewe and prioritises pedestrians and cyclists in the road hierarchy. However, all of the actions will encourage car use, or facilitate short distance walking rather than cycle commuting which is the only way to offer choice of a car. It is understood that most journeys across or to the station are less than two miles so perfect for modal shift. It would be good to get data on this.
- The principle of requiring developers to contribute to infrastructure costs where this has been provided by the authority in order to accelerate development is agreed. The inclusion of non-capital activities such as skills training is welcomed. There are also other activities such as start-up support, incubation, and shared facilities such as meeting/conference spaces which could be funded similarly.

#### Policy GD7 – Design of Development

- Policy GD7 does not go far enough in relation to biodiversity net gain and is not in line with the Chancellor's recent statement. Natural England would like to see the statement "wherever possible" removed and the Policy strengthened by setting out a clear expectation that all development should achieve biodiversity net gain and recommending the use of the Defra Metric to ensure a consistent approach. The Policy could also suggest appropriate measures to improve water quality and manage flood risk in order to better guide forthcoming development. The Policy should protect and enhance sites of biodiversity importance.
- Environment Agency (EA) are pleased to see key environmental issues relating to the provision of green space, habitats and the potential flood risk from Valley Brook have been realised (¶ 3.4 and 3.5, Policy GD7 and 7.16). The EA note in ¶7.16 consideration has been given towards inclusion and delivery of natural solutions to the issues of ventilation and water retention. The delivery of natural-based solutions is presently being explored by the EA Urban Pioneer Team.
- Excellent to consider the wider physical and mental health outcomes (¶7.16).
- Skills and Growth Company are currently working with the North Cheshire Garden Village to understand how 'smart' and digital can contribute towards sustainable development in the Masterplanning of the site, and would welcome a similar discussion to ensure that the design of the area is future proofed. The confirmation of the incorporation of renewable or low carbon technology is welcomed, alongside high levels of energy efficiency, within the design of the development. A heat network would be an ideal asset within the area and that the station itself probably the best place to house the energy centre and anchor the development.
- Addition consideration should be given to the following areas: Direct reference to sustainable urban drainage; cooling in the public realm and climate resilience of design; integration of smart and digital technologies. In addition, a holistic approach to design would be welcomed across the masterplan area, utilising building standards such as WELL [www.wellcertified.com](http://www.wellcertified.com) to ensure the ongoing sustainability and desirability of development.
- United Utilities would recommend additions within the AAP to ensure the standards for high quality design includes reference to ensure improvements to the water environment are delivered. United Utilities recommends the following addition: "5. Include an assessment of the surface water hierarchy."

#### Policy GD8 – Integrating Development around the Station with the rest of Crewe

- It is important for any new development that comes forward under the CHAAP to integrate fully not only with the immediate development but also "with the existing urban fabric of Crewe beyond the boundary of the Area Action Plan".
- Support the identification of three modes to integrate the wider context to the proposed future development and the usage of housing type and tenures as a method of integration.
- Acknowledge the role that good-design can play within a community and actively encourage it where possible.

- The land to the West of Crewe Road and South of Gresty Lane can facilitate such links between the Station Hub and the wider community.
- To maximise the benefits to Crewe, it is critical that the HS2 Station is successfully integrated into the urban fabric. Regard should be taken of the business assets within the station area. Strengthening the physical linkages between the Station and key employment sites within the immediate vicinity of the Station (such as Crewe Business Park) and to facilitate access for assets further (such as bus priority or intelligent traffic management).

#### Policy GD9 – Safeguarding Crewe’s Railway and Built Heritage

- Agree with the aim to safeguard Crewe’s railway heritage, which has the potential to support the visitor economy, encourages the take up of science and engineering, and be part of the town’s USP to attract investment.

#### Policy GD10 – Complementing Crewe Town Centre

- Not sure that the town centre can offer anything. Perhaps the centre should shift to the station, with a pedestrian bridge link over the short distance to the heritage centre and retail park.
- Agree with the need to ensure that the development complements the town centre whilst serving the needs of development around the Station.

### **8. Developing the Options**

- The options section of the Strategy is confusing in that it mixes geographical boundaries with different approaches to development. The two should be considered separately.
- The boundary of the AAP should be drawn so as to manage and co-ordinate demand for development arising from the HS2 Hub Station. This would imply a boundary following the geography of Option 3. There is an argument for extending this boundary further to incorporate the length of Mill Street up to the junction with Vernon Way, and the High Street area of the Town Centre, to complete the route of the link between the station and the town centre.
- The Strategy does not make it clear why the three descriptors (Commercial and Regeneration led; Mixed Use Development led; and Opportunity and Market led) are applied to specific geographical areas. Is there any reason why the geographical area of Option 3 should not focus on commercial and regeneration?
- It is suggested that the three levels of development are either dropped from the Strategy, or a separate section is included to deal with different types of development.
- The Strategy should cover a wider area. The Strategy incorporates a large number of thriving businesses off Weston Road and Macon Way. Should re-development proposals come forward for higher value uses on these sites, where will existing employers go, given that there is little or no immediately available employment land in Crewe (save for the large scale logistics development on Basford West). There should therefore be a restriction on the

redevelopment of B1, B2 or B8 uses for residential or other non-employment purposes unless there is land available in the Crewe area for their relocation.

- The AAP needs to recognise that the rail sector will continue to play an important part in the economy of Crewe. It should include reference to supporting the retention and expansion of this industry, which is a major employer and will have growth opportunities in the immediate future. Many such businesses are in the “opportunity areas” and consideration must be given to their future needs, and how to integrate them with the wider ambitions for the area. The railway heritage also has significant potential for giving the area a distinctive character. Consideration needs to be given to the integration of the Heritage Centre into development plans, and to the role that LNWR Heritage can play.
- Hough and Chorlton Parish Council is very close to the urban area of Crewe and consider to be particularly vulnerable to future development pressures which would ruin the character of the area and considerably reduce quality of life.
- The approach CEC has taken in identifying the development options is considered to be sound and in-line with the Vision, Objectives and Key Assumptions. The Council has used available data; growth patterns, land-uses and evidence produced by the Constellation Partnership, to underpin the options presented.
- The supporting text surrounding each of these Opportunity Areas provides detail of the land-uses expected within each area, the proposed densities, and key pieces of infrastructure expected to be implemented. Story Homes provides support to CEC in providing this detail but are unclear as to how this detail has been developed. Although the Council have appended some background evidence papers to this document, it is unclear the origins of the assumptions made within this document.
- Story Homes considers Option 3 to be the most appropriate Option for the development of the Crewe Hub. This approach allows the most flexibility for the development of the Crewe Hub, allowing the market to dictate when residential property should come forward and in what form. The Council should aim for a greater degree of investment in order to drive the job creation figure and therefore the local economy.
- There is no clear logic for the identified opportunity areas boundary and why the wider area identified on page 22 of the Crewe HS2 Hub Masterplan Vision 2017 isn’t included, which contains the Basford development area. The strategic locations of Basford East and West should be included as they directly relate to the future development at the Crewe Hub. Furthermore, the Basford development area should include the adjoining Gresty Lane site which could deliver up to 450 homes.
- ¶18.25 should be amended from "Deliver a pedestrian focused public realm that improves connectivity to and from the station" to "Deliver a pedestrian and cyclist focused public realm that improves connectivity to and from the station."
- Natural England does not agree that generic policies in the Local Plan are sufficient to mitigate for negative impacts on biodiversity as a result of delivering CHAAP. The Sustainability Appraisal (SA) should assess the impacts on the different boundary options and the results of this should influence the preferred option. Once a preferred option is selected, the findings of the SA and proposed mitigation should be incorporated into policy wording.

## **9. Boundary Options**



- The centre of Crewe has issues with traffic congestion, constrained by its Victorian railway bridges and road network. If funding to improve infrastructure is not forthcoming the proposed development of up to 7,150 apartments within the centre of Crewe as proposed under Option 3 would exacerbate the traffic issues further, given the resulting significant increase in population. In contrast, lower density housing located outside (such as on the Gresty Lane site) of the CHAAP identified boundary option plans would alleviate traffic concerns.
- Support for the application of Scenario 3 within the CHAAP; and as such also supports the application of Boundary Option 3. This Boundary Option provides the most scope to deliver the higher housing and employment number in an appropriate and suitable manner. Boundary Option 3 allows the future development to be distributed across a larger opportunity area, facilitating a greater degree of choice and variance across Crewe.
- A fixed boundary should not be applied to the CHAAP, but it is recognised that the Council needs to attribute an arbitrary boundary to each of these Development Options. Boundary Option 3 should be applied as it allows the greatest degree of flexibility.
- Story Homes strongly encourages the Council to reconsider the use of development boundaries within the CHAAP as it may stifle development and limit future opportunities.

#### **10. Identifying Potential Sub-Areas**

- Agree with providing potential sub-areas for development as they can be useful in identifying and applying specific approaches, such as land-use. However these sub-areas should not be considered in isolation of one-another and should only be used as a tool for driving progress with the CHAAP. It is important that these sub-areas are considered in this way and are not used in a prescriptive manner, as there is a risk that pockets of development will occur that do not relate to each other.
- It is essential that CEC consider these sub-areas in relation to the wider area and each other.
- Crewe Town Council supports the propositions for the opportunity areas, with the exception of Opportunity Area 8, where residential development should not be encouraged at the expense of existing employment. In any event it is unlikely to present a suitable environment for housing, unless the whole of the employment area were to be redeveloped, which would result in the loss or relocation of hundreds of jobs and businesses. Similar considerations apply to Opportunity Area 9.
- Morning Foods supports the advantages and benefits of HS2 to Crewe and the wider region. However, it is considered that the Strategy make no provision for existing industrial activities on Crewe Gates Industrial Estate. Existing businesses will find their current and future investment plans no longer meet the planning priorities of the area. Most of these businesses have been established very successfully in Crewe for many decades and provide substantial employment and positive added value to the local area. For example, on what is currently fully occupied industrial land, the AAP states that this “offers an opportunity to take a market led approach to development and enable further mixed commercial and



residential development.” Such development is in conflict with existing use AAP policies (promoting classes A2 & B1 for example) must not adversely impact the development and investment of existing businesses within the ‘secondary’ and ‘peripheral’ zones. The majority of businesses on Crewe Gates Industrial Estate have existing B2 & B8 use. These classes must be favoured over the AAP to protect existing jobs and investment.

- The AAP must also provide viable relocation options if existing jobs and investment are to be maintained and valued. Where industrial land to date has been allocated in local plans, it has not been reasonably accessible to the established businesses of Crewe.
- Several opportunity areas as noted within Picture 10.1 are within proximity of Valley Brook which is a designated “main river”. The section of the river in question flows through the area part in open channel and part in culvert. According to Environment Agency Flood Mapping, Opportunity Areas 2, 3 and 4 have sections which fall within Flood Zone 2. In the case of Opportunity Area 4 there is partial encroachment into Flood Zone 3. The Environment Agency asks that any development within these areas follows the standard correct procedure in line with the Planning Practice Guidance (PPG) and strongly recommend the use of flood proofing and resilience measures.
- If a Main River is located on or within 8 metres of a proposed development site, then an ecological survey is required to establish whether development is likely to have a detrimental impact on the biodiversity of the watercourse. Development proposals would not be supported if there was shown to be a likely detrimental impact on the water environment. Opportunities to incorporate biodiversity in and around the development should be encouraged. Schemes should be designed with a naturalised buffer zone of at least 8 metres from the main river to protect and enhance the conservation value of the watercourse and ensure access for flood defence maintenance.
- Aspirations of a “green and vibrant route” in Opportunity Area 1 suffers from the recent planning approval 18/5040N.
- ¶10.5 is confusing and should be changed from “The pedestrian link will be an exemplary feature of the public realm strategy, prioritising pedestrian and cyclist movement and fully integrating green and blue infrastructure” to “The pedestrian AND CYCLIST link will be an exemplary feature of the public realm strategy....”
- The Crewe Arms Service Station lies within Opportunity Area 3. Esso are supportive of development that could result in additional trade at the Service Station. However, they are fully committed to the future operation of this site as a petrol filling station, and would contest any desire to redevelop the site as part of any wider masterplan.
- The Strategy states that Crewe Arms Roundabout ‘should be reconfigured so as to improve the quality of public realm and the environment and ease of access for pedestrians and cyclists’. Given the trading advantages enjoyed by virtue of the location of the Crewe Arms Service Station adjacent to the roundabout, any reconfiguration of this roundabout would be of potential concern.
- Does Opportunity Area 4 mean that CEC are looking to take over the Ludlow Avenue area and replace the bungalows with higher density housing?
- The Royal Mail Group site is located within Opportunity Area 6 which suggests that “the fundamental objective for the area could be to provide the best possible interface between the operational station and the town of Crewe.” Royal Mail supports this statement but

believe that in terms of implementation, CEC must look at different options particularly in relation to the Southern Link Bridge that would require Royal Mail and its tenants to relocate.

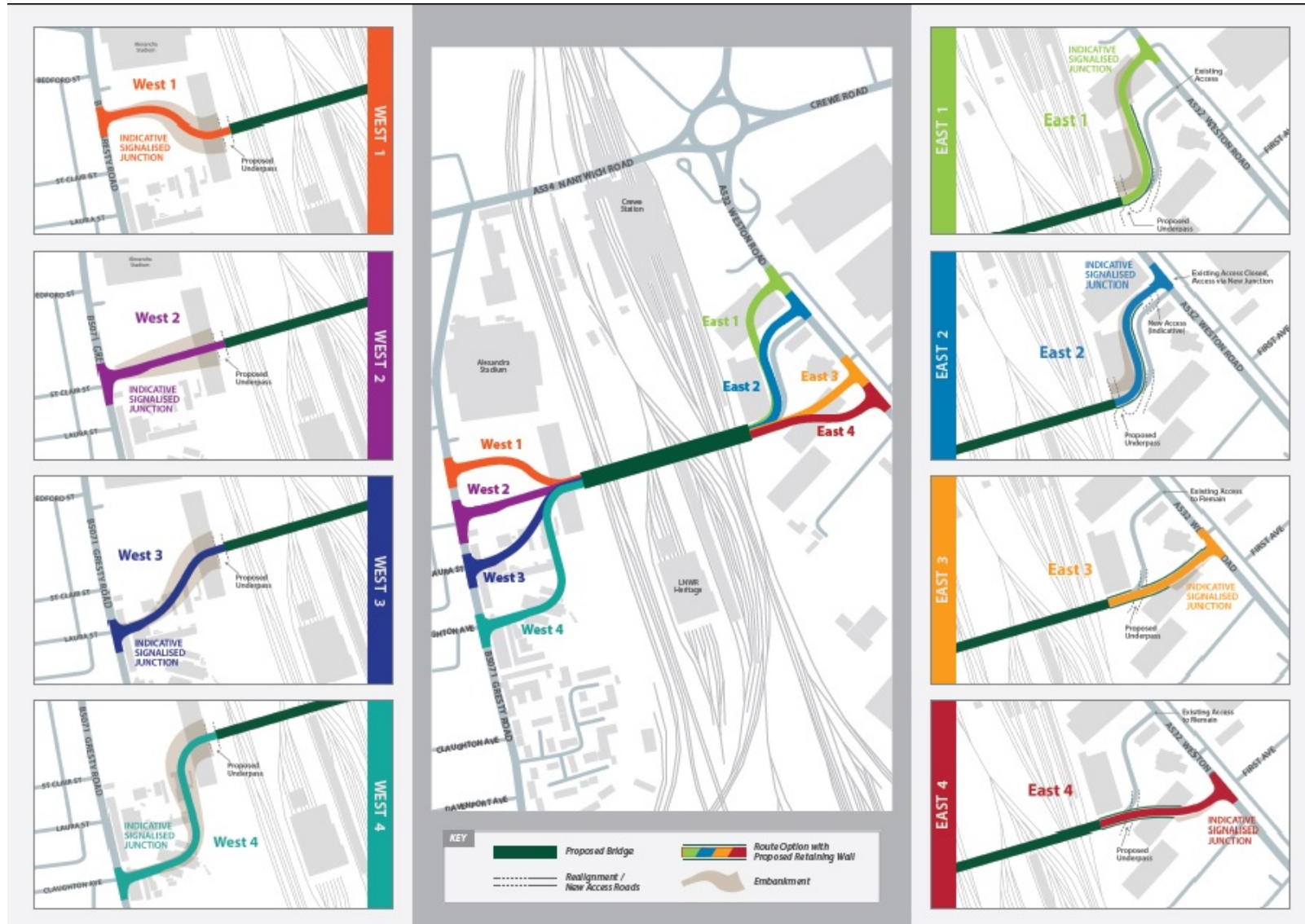
- Regard should also be had to the appropriate land uses within the vicinity of the site to prevent conflict between the existing Royal Mail operation at the Crewe Delivery Office and future occupiers that are particularly noise-sensitive. Royal Mail recommends that future uses for the area directly surrounding the Delivery Office should be safeguarded for commercial and industrial uses.
- The additional homes and businesses proposed would create a demand for postal services, increasing the importance of retaining the Crewe Delivery Office in close proximity to its aimed location.
- The “triangle of land” in Opportunity Area 10 is occupied by 59 houses and 9 businesses. At a time when there is an acknowledged national shortage of homes, demolishing 59 homes makes no sense. To replace the houses and businesses with “further office led development” also makes no sense, especially when Rail House is apparently almost empty.
- Objection to ¶10.37 where Gresty Lane is to remain as a two way for cyclists.

## **11. Seeking your Feedback and Next Steps**

- South Cheshire Chamber of Commerce wishes the following to be considered: how the developments will impact on existing businesses and work with them to minimise the impact of changes, but conversely help them prosper; how the station can be developed should HS2 not happen; a focus on employment sites in and around the station that will not impact on the ambitions of the town centre. The Chamber of Commerce would also like to see a better collaboration between the public and private sector to maximise the benefits of this development. There needs to be strong leadership promoting the benefits of the Crewe Masterplan and vision, and making sure the impact of HS2 is seen throughout the region.
- National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets.
- Network Rail is a statutory consultee for any planning application within 10 metres of relevant railway land and for any development likely to result in a material increase in the volume or material change in the character of traffic using a level crossing over a railway. Network Rail will continue to work with CEC to seek ways to deliver a Crewe Hub.
- Highways England notes the publication of the Strategy report with interest. Whilst the Strategy does not discuss connections with the Strategic Roads Network (SRN), this is implied by the aims of the Strategy. Highways England would therefore expect continued engagement with CEC on these proposals - in particular, discussion of the scheme’s impacts on SRN connections and existing sensitivities, the scope of Mott MacDonald’s modelling exercise, and explore the quantum of development and impact assessment associated most notably with a market led development option.
- The Coal Authority has confirmed that the site does not indicate any risks posed to site stability from past coal mining activity at shallow depths or surface features.

- Homes England have confirmed that they do not have any land holdings affected by the consultation but are keen to continue to work with CEC to fulfil housing growth ambitions.
- Manchester Airport are supportive of the Strategy. Journeys made to airports by passengers are extremely time-sensitive and they can have a high economic value. Passengers require a high level of confidence that transport links will be reliable, frequent and of high quality of service. The current rail connectivity between the Airport and Crewe is underserved with an hourly service operating by Northern Rail. Manchester Airport are working with partners to explore the opportunity to increase the rail capacity between the Airport, Crewe and beyond. This is to develop improved transport choices for passengers and staff in areas to the south of the Airport. Manchester Airport are also fully supportive of the Strategy including the opportunities to capitalise on and reinforce the opportunities of HS2 and Northern Powerhouse Rail.
- A timetable contained within the Strategy (Table 11.1) identifies that the CHAAP is scheduled to be adopted in the 2nd quarter of 2020. This is assumed to be a typographical error as the submission to the Secretary of State for examination is scheduled for the 4th quarter of 2020. It is therefore assumed that the adoption of the CHAAP is anticipated to be in 2021.
- The Strategy (Table 11.1) states that a Publication Version will be completed in the 3rd quarter of 2019 and that ahead of submitting a Pre-Publication Draft, the Council may undertake further consultation under Regulation 18 as additional evidence is prepared. It is requested that further consultation does take place prior to submission of a Pre-Publication Draft CHAAP to enable a fully informed response to the CHAAP, as the current version is considered to be lacking in sufficient detail.

## Appendix 2 Southern Link Road Bridge: Route Options



OFFICIAL