

## **Record G – Evidence Bases**

- Responses from Prescribed Bodies and Specific Consultation Bodies as part of the Local Plan process on Local Plan evidence bases.
  - Green Belt Assessment 2016
  - Minerals Safeguarding Areas 2017

**From:** [Mcgrath, Joanne](mailto:Mcgrath.Joanne)  
**To:** [Jimmy.McManus@salford.gov.uk](mailto:Jimmy.McManus@salford.gov.uk); [lesley.franklin@trafford.gov.uk](mailto:lesley.franklin@trafford.gov.uk); [N.Clarke@wigan.gov.uk](mailto:N.Clarke@wigan.gov.uk); [Adrian.Fisher@cheshireeast.gov.uk](mailto:Adrian.Fisher@cheshireeast.gov.uk); [D.Hodcroft@agma.gov.uk](mailto:D.Hodcroft@agma.gov.uk); [Joanne Harding](mailto:Joanne.Harding); [Lyndsey Darwin@urbreg/STHMBC](mailto:Lyndsey.Darwin@urbreg/STHMBC) ([LyndseyDarwin@sthelens.gov.uk](mailto:LyndseyDarwin@sthelens.gov.uk)); [spatialplanning@cheshirewestandchester.gov.uk](mailto:spatialplanning@cheshirewestandchester.gov.uk); [MikePalin@sthelens.gov.uk](mailto:MikePalin@sthelens.gov.uk)  
**Cc:** [Bell, Michael](mailto:Bell.Michael); [Sarah Lewis \(Sarah.Lewis@arup.com\)](mailto:Sarah.Lewis@arup.com); [Anna Ortega](mailto:Anna.Ortega)  
**Subject:** Warrington Borough Council Green Belt Assessment - Draft Methodology Report  
**Date:** 26 April 2016 16:02:00  
**Attachments:** [Warrington Green Belt Assessment Part 1 Final Draft 19.4.pdf](#)  
[Map GA1 \(LR\).pdf](#)  
[Map GA2 \(LR\).pdf](#)

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Dear All

Warrington Borough Council have recently appointed ARUP to undertake a Green Belt Assessment.

The proposed methodology report is now complete in draft form and we would welcome your comments on the document.

The overall aim of the study is to undertake an independent and comprehensive assessment of how land within the Warrington Green Belt performs against the Green Belt purposes (as set out in paragraph 80 of the NPPF).

Please could you review the attached report and accompanying maps and let us know if you have any comments or queries. We would be grateful if you could provide any written comments by close of play on **Monday 16th May**

If you have any questions in the meantime, please do not hesitate to contact me.

Many thanks

**Joanne McGrath**  
**Principal Planning Policy & Strategy Officer**  
Planning Policy and Programmes  
Warrington Borough Council  
Economic Regeneration, Growth & Environment  
New Town House  
Buttermarket Street  
WARRINGTON  
WA1 2NH

**From:** [Joanne Harding](#)  
**To:** [Mcgrath, Joanne](#)  
**Cc:** [Bell, Michael](#); [Alasdair Cross](#); [Anne Moyers](#)  
**Subject:** RE: Warrington Borough Council Green Belt Assessment - Draft Methodology Report  
**Date:** 05 May 2016 12:04:51  
**Attachments:** [image001.jpg](#)  
[Warr\\_GBelt\\_Assessment\\_Part\\_1\\_Final\\_Draft\\_2016-04-19th\\_\(Cmts\)\\_v2.docx](#)  
[ATT00001.txt](#)

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Hi Joanne,

Please find attached HBC's comments on the draft methodology report and below some of our more general comments on the report.

- Please suggest to Arup that they have a look at the Plain English Guide and review the document again, some of the language and sentence structures appear to be used specifically to confuse the reader
- It is rather difficult to comment on some aspects of the methodology without a better understanding of the parcels to be used for the assessment
- In some instances it may be easier to include a diagram or real life examples to explain an area of the methodology eg para 98
- The explanation of the proposed methodology is impenetrable in places
- It is disappointing that they have chosen to ignore the Green Belt Studies from Sefton / West. Lancs / Knowsley that were done to broadly the same methodology and have each been through examination. (is it because they predate the PAS Guidance?)
- At para 55 the report comes close to misleading the reader by inviting them to conclude that the Courts have ruled the PAS Guidance is a material consideration.
- The report does not include Cheshire East in '*Appendix B Good Practice Review of Methodologies Adopted Elsewhere*', but quote it repeatedly throughout the document.
- The Maps supplied relate only to the Phase 1 high level assessment parcels, it would be useful have sight of the other parcels as and when they are determined.
- There are some concerns in relation to the approach proposed for the assessments, particularly the historic towns and urban regeneration, however this may be more to do with the clarity issue raised above.

Any comments or queries do please feel free to get in touch.

Kind regards

**Joanne Harding MRTPI**

Principal Planning Policy Officer  
Halton Borough Council  
Municipal Building  
Kingsway  
Widnes  
WA8 7QF

**Email:** [Joanne.Harding@halton.gov.uk](mailto:Joanne.Harding@halton.gov.uk)

**Tel:** 0151 511 6458



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**From:** Mcgrath, Joanne [mailto:jmcgrath@warrington.gov.uk]  
**Sent:** 26 April 2016 16:03  
**To:** Jimmy.McManus@salford.gov.uk; 'lesley.franklin@trafford.gov.uk'; 'N.Clarke@wigan.gov.uk'; Adrian.Fisher@cheshireeast.gov.uk; 'D.Hodcroft@agma.gov.uk'; Joanne Harding; Lyndsey Darwin/urbreg/STHMBC (LyndseyDarwin@sthelens.gov.uk); spatialplanning@cheshirewestandchester.gov.uk; MikePalin@sthelens.gov.uk  
**Cc:** Bell, Michael; Sarah Lewis (Sarah.Lewis@arup.com); Anna Ortega  
**Subject:** Warrington Borough Council Green Belt Assessment - Draft Methodology Report

Dear All

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Many thanks

**Joanne McGrath**  
**Principal Planning Policy & Strategy Officer**  
Planning Policy and Programmes  
Warrington Borough Council  
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**From:** [Franklin, Lesley](#)  
**To:** [Mcgrath, Joanne](#)  
**Cc:** [Taylor-Russell, Clare](#)  
**Subject:** RE: Warrington Borough Council Green Belt Assessment - Draft Methodology Report  
**Date:** 16 May 2016 10:14:25

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Hi Joanne

Thank you for sending your Green Belt methodology for comment. I have looked over your methodology and I consider it comprehensive and do not have any comments to make.

As you are aware Greater Manchester GMSF are also carrying out a Green Belt Assessment and I would be interested in seeing a copy of your completed Green Belt Assessment Report.

Regards

Lesley

**Lesley Franklin**  
**Senior Strategic Planning Officer**  
**Strategic Growth Services**  
**Economic Growth, Environment and Infrastructure**  
**Direct Dial: 0161 912 4770**  
**Planning Enquiry Line: 0161 912 3149**  
**Trafford Council | Trafford Town Hall, Talbot Road, Manchester M32 0TH**

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**From:** Mcgrath, Joanne [mailto:jmcgrath@warrington.gov.uk]  
**Sent:** 26 April 2016 16:03  
**To:** Jimmy.McManus@salford.gov.uk; Franklin, Lesley; 'N.Clarke@wigan.gov.uk'; Adrian.Fisher@cheshireeast.gov.uk; 'D.Hodcroft@agma.gov.uk'; Joanne Harding; Lyndsey Darwin/urbreg/STHMBC (LyndseyDarwin@sthelens.gov.uk); spatialplanning@cheshirewestandchester.gov.uk; MikePalin@sthelens.gov.uk  
**Cc:** Bell, Michael; Sarah Lewis (Sarah.Lewis@arup.com); Anna Ortega  
**Subject:** Warrington Borough Council Green Belt Assessment - Draft Methodology Report

Dear All

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Please could you review the attached report and accompanying maps and let us know if you have any comments or queries. We would be grateful if you could provide any written comments by close of play on **Monday 16th May**

If you have any questions in the meantime, please do not hesitate to contact me.

Many thanks

**Joanne McGrath**  
**Principal Planning Policy & Strategy Officer**  
Planning Policy and Programmes  
Warrington Borough Council  
Economic Regeneration, Growth & Environment  
New Town House  
Buttermarket Street  
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## Bell, Michael

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**From:** Jan Lourens/CEXEC/STHMBC <JanLourens@sthelens.gov.uk>  
**Sent:** 16 May 2016 17:03  
**To:** Mcgrath, Joanne  
**Subject:** Warrington Draft GB methodology  
**Attachments:** Warrington GB Assessment - St Helens comments.pdf

Hi Joanne

I hope you are well? Please find attached my comments, most of which are minor. The only bit that causes us some significant concern is the reference to historic towns in St Helens in Paragraph 117. I have annotated my comments and will be happy to discuss if needs be.

Kind regards

Jan

Jan Lourens  
Development Plans Manager  
Development Plans  
St Helens Council  
Tel: 01744 676198

(See attached file: Warrington GB Assessment - St Helens comments.pdf) "This e-mail and any file transmitted with it are confidential, subject to copyright and intended solely for the use of the individual or entity to whom they are addressed.

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## **St Helens Response to Warrington Draft GB methodology (comments extracted)**

### **Boundary Definition -**

Some water courses do not provide a strong boundary such as ditches with running water

Ownership has little influence on GB function and can change quite easily, fence line and hedgerow does not provide strong boundary but may be useful when drawing up parcel boundaries.

### **General Area Definition / Parcel Boundary Definition**

Safeguarded existing railway line as well as railway line in use?

### **Purpose 4 – Stage 1**

Newton Le Willows is not a nationally recognised historic town, we would prefer it if this paragraph is removed. This was not raised during the adoption of our core strategy and is not referenced in our 2013 scoping consultation

### **Purpose 5 – (unconstrained PDL SHLAA sites)**

Currently reviewing our SHLAA, should be able to provide updated data soon

**From:** [McManus, Jimmy](#)  
**To:** [Mcgrath, Joanne](#)  
**Cc:** ["D.Hodcroft@agma.gov.uk"](mailto:D.Hodcroft@agma.gov.uk)  
**Subject:** RE: Warrington Borough Council Green Belt Assessment - Draft Methodology Report  
**Date:** 20 May 2016 09:30:54

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Joanne

Apologies for the delay in responding to your email.

Thank you for sending through your Green Belt assessment methodology and the opportunity to comment.

You are of course aware that Greater Manchester is currently undertaking a similar assessment and we have also shared our methodology.

Further to your email, I have spoken with David Hodcroft at AGMA and we have no formal comments on your methodology at this stage, but would welcome the opportunity to review your draft study as it progresses.

Kind regards

Jimmy McManus

Principal Planning Officer  
Regeneration  
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Tel: 0161 793 2796

Email: [Jimmy.mcmanus@salford.gov.uk](mailto:Jimmy.mcmanus@salford.gov.uk)

---

**From:** Mcgrath, Joanne [mailto:[jmcgrath@warrington.gov.uk](mailto:jmcgrath@warrington.gov.uk)]  
**Sent:** 26 April 2016 16:03  
**To:** McManus, Jimmy; 'lesley.franklin@trafford.gov.uk'; 'N.Clarke@wigan.gov.uk'; Adrian.Fisher@cheshireeast.gov.uk; 'D.Hodcroft@agma.gov.uk'; Joanne Harding; Lyndsey Darwin/urbreg/STHMBC (LyndseyDarwin@sthelens.gov.uk); spatialplanning@cheshirewestandchester.gov.uk; MikePalin@sthelens.gov.uk  
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Many thanks

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**Principal Planning Policy & Strategy Officer**  
Planning Policy and Programmes  
Warrington Borough Council  
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Thank you.





# The Coal Authority

## Warrington Borough Council - Safeguarding Minerals

### Consultation Deadline – 10 February 2017

#### Contact Details

Planning and Local Authority Liaison Department  
The Coal Authority  
200 Lichfield Lane  
Berry Hill  
MANSFIELD  
Nottinghamshire  
NG18 4RG

Planning Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)  
Planning Enquiries: 01623 637 119

#### Person Making Comments

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*  
Planning Liaison Manager

#### Date of Response

10 February 2017

### **Background on the Coal Authority**

The Coal Authority is a Non-Departmental Public Body sponsored by the Department for Business, Energy & Industrial Strategy. The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The main areas of planning interest to the Coal Authority in terms of policy making relate to:

- the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework and the National Planning Practice Guidance;
- the inclusion of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in the National Planning Policy Framework and the National Planning Practice Guidance; and
- ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework and the National Planning Practice Guide.

### **Background to Coal Issues in Warrington**

#### Surface Coal Resources and Prior Extraction

As you will be aware, the Warrington Borough Council area contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting to approximately 0.42% of the Warrington Borough Council area.

The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.

### Coal Mining Legacy

As you will be aware, the Warrington Borough Council area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas. The Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.

The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of coal mining legacy issues.

Within the Warrington Borough Council area there are approximately 5 recorded mine entries. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards.

Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

### **Specific Comments on the Warrington Borough Council - Safeguarding Minerals Consultation**

The comments and/or changes which The Coal Authority would like to make or see in relation to the above document are:

#### **Question 1**

Although the Coal Authority would not wish to make specific comment on all of the minerals proposed in the list we are pleased to see that the shallow coal resource present in Warrington is identified as a nationally important resource that should be safeguarded.

It is also welcomed that the PEDL license areas, although not proposed for safeguarding, will be identified on the map.

## **Question 2**

The Coal Authority is pleased to see that the extent of the MSA for coal, as shown on Map 6, accords with our own records in respect of surface coal resource in Warrington. The Coal Authority therefore supports the extent of the MSA as proposed.

## **Question 3**

Although the Coal Authority has no specific comments to make we do support the principle of safeguarding mineral infrastructure sites.

## **Question 4**

The consultation document includes a buffer for shallow coal resource of 250m, although the Coal Authority has no specific buffer requirement when safeguarding surface coal resource we note that this distance accords with the guidance in the Mineral Safeguarding in England: Good Practice Guidance, dated 2011.

## **Question 5**

Although the Coal Authority agrees with the majority of the exemptions proposed we do not generally support proposals to exclude the urban area from the requirements of the MSA. It is noted that it is proposed to define a size threshold, with sites under 5ha exempt. The Coal Authority does not consider with regard to surface coal resources that there is any justification for excluding the urban area from the safeguarding and the effect of sterilisation from a small development in a MSA can be significant. The extraction of coal can be successfully carried out on relatively small sites within urban areas in advance of development and the Coal Authority would therefore not wish to such areas excluded from the MSA. However, in the case of Warrington, we accept that the surface coal resource area is limited to the extreme north western corner of the LPA area and accordingly does not coincide with the urban area. In this particular instance therefore we would not object to the LPA's proposed exemptions.

Thank you for your attention.

**For and on behalf of**

**Mark Harrison** *BA(Hons), DipTP, LLM, MInstLM, MRTPI*

**Principal Manager – Planning & Local Authority Liaison**

Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
Cheshire  
WA1 2NH

**Our ref:** SO/2006/000276/OR-  
07/PO1-L01  
**Your ref:**  
**Date:** 07 February 2017

Dear Sir/Madam

### **Mineral Safeguarding in Warrington**

Thank you for submitting the above document which was received on 31<sup>st</sup> January 2017.

Please see our answers below to the questions within the document.

**Q1:** Yes - The list of minerals to be safeguarded is agreeable but it is not clear how or why a 500 m buffer is assumed around a mineral resource boundary that has not been geographically defined. (ie The proposed sandstone MSA for Southworth Quarry) The 500 metres buffer may be appropriate, or perhaps even more if the intention is to consider things like deep dewatering interfering with water resource interests, but much depends on the depth of proposed or permitted working. If the interest is only in superficial interference between developments such as noise, visual impact and emissions etc then 250m may be a more appropriate buffer.

**Q2:** No – The map presented is at much too small a scale to facilitate due scrutiny of the boundaries. For that reason it is not possible to comment in detail. For information: Just because the BGS Mineral Resource Map suggests that there may be a deposit of a given mineral, there is no guarantee that a viable economic resource exists. For example: The mapped extent of sand and gravel deposits to the south of Winwick appears somewhat over-stated where M62 site investigation borehole logs showed no sand to be present.

As acknowledged in the text of the consultation document, the Sandstone mineral resource has not been defined cartographically, so it will be appropriate to better define the extent of this potentially important resource, either by means of geological data or the extent of the existing permits.

The areas of clay resource to be subject to safeguard are similarly inadequately defined.

It is not clear from the scale of the map as to whether the proposed Mineral Safeguard

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Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

Zones have taken account of areas already sterilised by other constraints such as Habitats Regulations SAC status or existing landfill deposits or built development etc. This is particularly relevant in respect of places like the Southworth Quarry Landfills and the Rixton Landfills etc,

It is also unlikely to be meaningful to include existing built up areas in the proposed mineral safeguard area for sand and gravel unless the target mineral can be shown to be so thick as to leave a workable deposit after removal of material corrupted by the existing or former built development and services etc. (EG Callands, Hulme, Orford, Longford Westy, Paddington, Woolston etc.)

**Q3:** No objection to the safeguarding of these 'minerals infrastructure' features. - No additional sites proposed.

**Q4:** It is not clear from the consultation document why 250m is considered an appropriate distance, or how it is anticipated that new development will 'sterilise' an existing permission, - but no objection in principle to this proposal.

**Q5:** No objection to the proposed exemptions.

Should you wish to discuss anything further please do not hesitate to get in touch.

Yours faithfully

**MRS LAILA BERRY**  
**Planning Advisor**

Direct dial 02030250761

Direct fax

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Historic England

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Your ref:

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Dear Sirs,

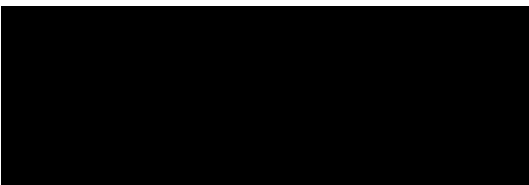
### **SAFEGUARDING MINERALS IN WARRINGTON**

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.

If you have any queries about any of this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



**Emily Hrycan**

Historic Environment Planning Adviser (North West)

Historic England



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