



Warrington Borough Council
Local Development Framework – Core Strategy
Issues and Options Report of Consultation
September 2009



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Introduction

1 Introduction

1.1 The Core Strategy Issues and Options Report was the subject of consultation between the 2nd February and the 23rd March 2009. The main report was supported by five area background papers and seven topic background papers as well as a revised Sustainability Appraisal Scoping Report.

1.2 This report sets out all of the consultation responses received during and since this consultation and gives an initial response from Planning Officers as to how the comments will be taken forward in the Core Strategy production process. The responses to the Issues and Options main report are set out first, followed by those that were received for individual area background papers and topic background papers. Finally, responses to the Sustainability Appraisal Scoping Report are set out. No specific responses were received on the background papers for East Warrington and for Waste, although reference may be made to this area and topic in the more general responses received to the main Issues and Options Report.

1.3 During the consultation period a focus group was held at the Village Hotel. Points raised and discussions held at this focus group were the subject of a separate report published in April 2009.

1.4 The Issues and Options consultation was undertaken for a number of reasons:

- To set out the overall approach and test the degree of support for it
- To obtain the views of consultees on the key issues, draft vision and objectives
- To seek views as to whether the options presented were appropriate and to gain an initial view of which option may be preferred prior to further detailed work.

1.5 Much work has been carried out since the consultation period on the Issues and Options Report closed with additional pieces of evidence and research being undertaken as well as meetings and discussions with stakeholders. Work on the Core Strategy document has therefore progressed as a result of the consultation and additional work and it is anticipated that a Refined Options Report will be the subject of consultation early in 2010. This document will set out in much more detail future proposals for the Core Strategy and will enable more meaningful engagement of stakeholders in the selection of a preferred option.

2 Issues and Options Report Schedule

Issues and Options Report Schedule 1

ID	Name and Organisation	General Comments	WBC Officer Comments
General Comments			
CSIO/1	Jill Stephenson Network Rail	<p>Network Rail supports the inclusion of railway stations and passenger facilities within the list of infrastructure provision to be supported by developer contributions. This policy should be exercised where development benefits from the existence of a railway station, and where it may put increasing pressure on capacity (through increased passenger numbers).</p> <p>If the Council intends to adopt CIL, we would be grateful to be consulted.</p> <p>A further objective that the report should support is the provision of car parking for rail passengers. This is essential to meet the growing demand on rail travel and to promote multi-modal journeys.</p>	<p>Support for the inclusion of railway stations and passenger facilities within infrastructure provision noted.</p> <p>Future proposals on CIL will involve appropriate consultation.</p> <p>The issue of car parking at rail stations is recognised as an important consideration in Warrington.</p>
CSIO/2	Civil Aviation Authority	<p>Whilst the CAA would not wish to comment on local development plans, where officially safeguarded aerodromes lie within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the aerodrome operator(s) / licensee(s) directly.</p> <p>Notwithstanding the comments above, the following, whilst by no means a comprehensive list of all development/aviation related issues, might provide useful background material:</p> <p>'Other' Civil Aerodromes. Operators/licensees of civil aerodromes other than those that are officially safeguarded are advised to take steps to protect their locations from the effects of possible adverse development. To this end local authorities might agree to accept a 'non-official' safeguarding map from any local aeronautical site. If the Council has agreed to hold such maps, it should approach the site operator directly for comment on planning matters. Local planning authorities are asked to respond sympathetically to requests for non-official safeguarding. The CAA is prepared to offer advice on the preparation of a non-official safeguarding map at the request of aerodrome operator or local planning authority. ODPM circular 1/2003 (annex 2, paragraph 13) refers.</p>	<p>Comments and Background material noted.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Telecom Installations. Whilst it is noted that the General Development Order states that applications for the masts within 3km of an aerodrome should contain evidence of notification to the CAA or aerodrome operator, the appropriate contact is the aerodrome operator. Notification to the CAA will result in advice to contact the aerodrome operator.</p> <p>Wind Turbines. All wind turbine proposals, whether prior to, or at, formal planning application stage, should be notified to both the CAA's Directorate of Airspace Policy and to Ministry of Defence (Defence Estates). Addresses for each organisation are:</p> <p>Directorate of Airspace Policy, K6 Gate 3, CAA House, 45-59 Kingsway, London, WC2B 6TE Safeguarding, Defence Estates, Blakemore Drive, Sutton Coldfield, B75 7RL</p> <p>High Structures. Notwithstanding the requirements of local aerodrome operators to consider the impact of structures within their (officially or unofficially) safeguarded area, away from the immediate vicinity of an aerodrome, tall structures might nevertheless constitute an aviation hazard. In view of this, there is a mandatory lighting requirement for structures of a height of 150m or more. Moreover, away from aerodromes, even structures less than 150m high may need to be lit if by virtue of their nature or location they constitute a significant hazard to air navigation. It is recommended that all proposed developments over 90m in height should be notified to the Directorate of Airspace Policy (DAP) and comment sought relating to the need or otherwise for aviation obstruction lights.</p> <p>Additionally, to cater for the need to record in aviation documents and charts at structures extending 91.4m (300ft) above ground level, local planning authorities are asked to inform the CAA/DAP about developments that might breach this level.</p> <p>DfT/ODPM Circular 1/2003 (annex 2, paragraph 30-32) refers.</p> <p>Venting and Flaring. Venting and flaring of gas should be anticipated with mineral extraction. This might have a potential impact upon the safe operation of aircraft in the immediate vicinity. With this in mind, should planning permission be granted, it would be essential to establish whether such releases of gas would constitute a potential danger to overflying aircraft. If there were such a danger, the site would need to be promulgated to the aviation community along with advisory avoidance criteria.</p>	Comment noted.
CSIO/3	Louise Dale Defence Estates	I am writing to confirm the statutory safeguarding position of the Ministry of Defence (MOD) with respect to the above consultation document.	

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		I can confirm the areas outlined fall outside of a statutory safeguarding area. Therefore, the MOD has no safeguarding objections to development within this area.	
CSIO/18	Laurie Lane CBRE for United Utilities	<p>The outline planning permission for the site permits the relocation of the existing sub standard playing fields at Cardinal Newman High School from their existing location at the south of the school to the north, onto the former Westy Wastewater Treatment Works. The facilities that will be relocated include:</p> <ul style="list-style-type: none"> • 1 all-weather pitch (including cricket nets); • 2 grass football pitches; • 1 grass rugby pitch • 1 grass athletics park; • 1 Cricket square, field event facilities; and • orienteering circuit <p>The outline planning permission also permits the redevelopment of the existing playing fields for residential development, which is required in order to fund the new and improved playing field facilities along with a new superior access off Kingsway South for the school and housing development.</p>	<p>This site is included as a commitment in the Strategic Housing Land Availability Assessment.</p>
CSIO/36	Carolyn Wilson Mono Consultants Limited for Mobile Operators Association		<p>We have no representations to make in respect of the Council's draft Core Strategy Issues & Options as we understand that this is a strategic document. We would take this opportunity however to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Framework. It is recognised that telecommunications play a vital role in both the economic and social fabric of communities. National guidance recognises this through PPG8, which provides clear guidance as to the main issues surrounding telecommunications development. These include the legislative framework, siting and design issues, levels of consultation and issues surrounding electromagnetic fields (EMFs). Clear guidance is also given regarding what should be included within local plan (now LDD) policy.</p> <p>This guidance states that local plans (LDDs) should set out criteria based policies to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited. PPG8 also makes clear "Criteria should be flexible enough to allow for the efficient development of the network and the demands imposed by the technology".</p>

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		<p>Since the revision of PPG8 in 2001, the Office of the Deputy Prime Minister (ODPM) has produced, in conjunction with the industry, a Code of Best Practice. This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.</p> <p>As indicated above the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being PPG8. On this basis we would suggest that within the Local Development Framework there should be a concise and flexible telecommunications policy contained within one of the Council's statutory Local Document. We recognise that this is likely to be contained in a Development Control/Management DPD rather than the Core Strategy which is of a strategic nature. Such a policy should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads;</p> <p><i>Proposals for telecommunications development will be permitted provided that the following criteria are met:-</i></p> <ul style="list-style-type: none"> <i>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i> <i>(ii) If on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i> <i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i> <i>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</i> <p>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.</p> <p>It will of course depend on your Local Development Scheme as to which documents have statutory role in development control and which would be considered as material considerations. We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information,</p>	

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		<p>such as electromagnetic fields (EMFs) and public health, being contained within a separate LDD or what is currently termed Supplementary Planning Guidance (SPG). This could then be read with PPG8, the Code of Best Practice to give a comprehensive background to any proposed development. We would consider it appropriate to introduce the policy and we would suggest the following:</p> <p>Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the populations now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operation and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location an existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.</p>	<p>In summary, we recognise the early stage of LDFs and the early stage of the consultation process at which we are being asked for comment. We are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and the Council's policy aims. We have suggested text for both above. In keeping with the aims and objectives of the new legislation any background information should be contained within a separate LDD which would not need to go through the same consultation process.</p> <p>Gas and Electricity infrastructure will be considered as part of the Infrastructure work which will support production of the Core Strategy.</p> <p>The useful background information provided will feed into the Council's Infrastructure Capacity Assessment.</p>
CSIO/37	Leslie Morris National Grid	<p>The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for;</p> <ul style="list-style-type: none"> • An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations). • New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites). <p>Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.</p> <p>We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues;</p>	

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		<ul style="list-style-type: none"> • Any policies relating to overhead transmission lines, underground cables or gas pipeline installations • Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines • Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations • Any policies relating to the diverting or undergrounding of overhead transmission lines • Other policies relating to infrastructure or utility provision • Policies relating to development in the countryside • Landscape policies • Waste and mineral plans <p>In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.</p> <p>National Grid infrastructure within Warrington Borough Council's administrative area</p> <p><u>Electricity Transmission</u></p> <p>National Grid's high voltage electricity overhead transmission lines / underground cables within Warrington Borough Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:</p> <ul style="list-style-type: none"> • 4ZF line, 275,000-volt route from Rainhill substation to Frodsham substation. <p>The following substations are also located within the administrative area of Warrington Borough Council:</p> <ul style="list-style-type: none"> • Fiddlers Ferry substation - 275kV <p>National Grid has provided information in relation to electricity transmission assets via the following internet link:</p> <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW</p> <p><u>Gas Transmission</u></p> <p>National Grid has the following gas transmission assets located within the administrative area of Warrington Borough Council:</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
Pipeline	Feeder Detail		
1038	15 Feeder Crank / Warrington		
2617	21 Feeder Warrington / Warburton Fenceline	<p>National Grid has provided information in relation to gas transmission pipelines via the following internet link:</p> <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW</p> <p>Gas Distribution</p> <p>National Grid Gas Distribution owns and operates the local gas distribution network in the Warrington Borough Council area. Specific advice is available from the Plant Protection Team.</p>	Comments noted. Work is ongoing on the Council's Infrastructure Capacity Assessment which includes co-operation and information exchange with energy suppliers. In order for the Core Strategy to be sound it must ensure that appropriate infrastructure is provided to support the level of development envisaged over the next 15 years.

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CSIO/46	Ms Samantha Turner Principal Planning Officer 4NW	<p>As you will be aware, the Regional Spatial Strategy for the North West of England [1] was published on 30 September 2008. The plan replaces the previous RSS (formerly RPG13).</p> <p>You will no doubt also be aware of the Government's response to their consultation on the Sub National Review [2] and the subsequent publication of draft legislation [3] which sets out the Government's plans for each region outside of London to develop a Regional Strategy (section 65).</p> <p>It is intended that the Regional Strategy will in time replace the RSS and the Regional Economic Strategy (RES). The draft legislation identifies (section 65(6)) that the Secretary of State will direct which parts of the current published RSS and RES in each region will be deemed to form the Regional Strategy at the time the legislation is enacted. An important point to note is that the Regional Strategy will be part of the development plan (section 76) directly replacing the role currently occupied by the RSS.</p> <p>In advance of the legislative framework, regional agencies are developing a non statutory version of the Regional Strategy for the North West. The Regional Strategy will be a new and clear strategic investment framework for the region which builds on the learning gained in the process of developing the RES 2006, the Regional Spatial Strategy and current Partial Review of RSS and the Regional Housing Strategy.</p> <p>This Regional Strategy will not be statutory. It will provide an important building block which will give the region a head start in the development of a statutory Single Regional Strategy once the emerging primary legislation is in place. To keep updated on what is happening with the development of the Regional Strategy - please visit the dedicated website http://www.nwregionalstrategy.com/ and register to receive the regular email newsletter updates.</p>	<p>Comments noted. Full account will be taken of the emerging Single Regional Strategy in the preparation of the Core Strategy.</p>
CSIO/47	Ms Samantha Turner Principal Planning Officer 4NW	<p>Economy</p> <p>Housing Growth comes across as a fundamental issue for this Core Strategy Issues and Options report (due to Growth Point status and wider Government agenda), and as such the approach taken to deliver housing growth will have a significant bearing upon the types/locations/amounts of employment land provision required within the development period covered by this Core Strategy.</p> <p>The Vision for the Warrington Core Strategy emphasises the role that Warrington will play in the regional economy, identifying Omega as a key strategic location by which to fulfil its economic aims. The Core Strategy highlights the importance of developing the Omega site as a major employment location that will be of regional significance for high quality strategic business developments. This identified location relates well to the criteria based policy in W2, and will assist in the achievement of policies W1 and MCR6.</p>	<p>Comments noted, particularly the comment regarding RSS Policies W2, L2 and L4.</p> <p>The vision will evolve as the Core Strategy progresses. As a preferred strategy emerges, this will allow the vision to become more Warrington specific.</p> <p>Flooding issues will be fully considered in relation to Warrington Waterfront.</p>

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		<p>The Town Centre is also identified as another strategic site, and its importance as a community hub and the key focus for shopping, civic and cultural activities, food and drink, and for a significant number of jobs is highlighted. This approach is consistent with policy RDP1 which identifies Warrington as being the third priority for growth within the region and as such this means that development should be focused in and around the centres of the towns and cities. There are no other strategic sites identified relating specifically to economic uses.</p> <p>Policy MCR6 indicates that the strategic Framework for Warrington should focus on Brownfield sites to ensure that there is no further significant expansion onto open land, and that regeneration and restructuring of the older urban areas is supported. This policy approach would appear to favour Options 1 and 2 and possibly Option 3 in certain circumstances, depending upon detail provided at a later stage. The validity of the proposed options will become clearer once the evidence base; i.e. SHLAA etc. is in place to support the proposed approach.</p> <p><u>Housing</u></p> <p>Key issues: There is a strong focus on numbers - Policy L2 and L4 of the RSS give a steer on the need not just to deliver numbers, but to deliver the right mix and type of properties. This is something which will need to be guided by the Strategic Housing Market Assessment that has been prepared for Warrington. This has shown a demand for four bedroom dwellings in owner occupied section and two bedrommed houses in the social rented sector. The first paragraph mentions the fact that Warrington has been identified as Growth Point, however it needs to be recognised that it has been identified as part of the Mid Mersey Growth Point and that this will require joint working with Halton and St Helens.</p> <p>Vision: This could possibly more "Warrington specific", for example in the fifth bullet the disparities and inequalities that are specific to Warrington could be identified. Consideration should also be given to the importance of housing quality.</p> <p>Current situation of Warrington's Strategic Sites and Areas: The section on Warrington Waterfront does not refer to flood risk issues. Our understanding is that this is quite a serious issue in this area, and something which Environment Agency have flagged up through the Growth Point process.</p>	<p>Comments noted.</p> <p>Protecting, conserving and enhancing the historic assets of the borough has now been recognised as a key issue.</p>
CSIO/53	Ms Samantha Turner Principal Planning Officer 4NW	Environment	<p>Some text within the Issues and Options Paper seems to be positive in terms of the natural environment and we are pleased to note that a number of the key issues to be addressed relate to climate change and to safeguarding and enhancing the borough's environmental assets.</p>

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		<p>There are a number of RSS policies which would offer further support to the document, in particular policy DP1, DP7, EM1 and EM3.</p> <p>In terms of the natural environment, there is a need to ensure that growth has a limited impact on biodiversity, green areas, including open space and green belt. We are pleased to note that the Core Strategy encourages the promotion of a more integrated approach to delivering a better environment within the borough.</p> <p>4NW would like emphasise the importance of protecting, conserving and enhancing the historic assets of the borough and that growth should have a positive impact on these assets - this should be stressed through out the Core Strategy.</p> <p>We welcome the use of the integrated network of multi-functional open spaces and green corridors which are set to run throughout the borough as one of the key objectives for the Core Strategy. However there is a need to ensure this is continued throughout the future preparation of the Strategy. The Green Infrastructure Guide for the North West provides a detailed definition of green infrastructure, as outlined in Policy EM3 of the RSS. The guide offers broad advice on how to plan and enhance green networks.</p> <p>In relation to climate change, there is a need to ensure that new development integrates sustainable design such as Sustainable Drainage and Green Infrastructure to help tackle and adapt to climate change effects. Please see RSS policies DP9 and EM5.</p>	<p>The Green Infrastructure Guide for the North West will be taken into account in producing future documents.</p> <p>Comments regarding climate change have been noted.</p> <p>Comments regarding flood risk have been noted. A Stage 2 Strategic Flood Risk Assessment will be commissioned shortly which will look more closely at actual flood risk to sites.</p> <p>Comments regarding air pollution and energy conservation are noted.</p> <p>Wherever possible, new development should be located in areas where flood risk is low and that measures are to be taken to minimise the risk of flooding. The Core Strategy must therefore make sure that it takes account of the actual calculated risk of flooding and levels of mitigation in the borough when deciding where development should and should not take place. Sequential tests / Strategic Flood Risk Appraisal (SFRA) should highlight areas of flooding and the potential levels of risk in terms of probability analysis. Development should be guided by the technical/support document and the SFRA.</p> <p>In terms of air pollution and energy issues, Warrington should ensure that the borough supports sustainable development; if the population can access jobs and services near to their homes then this has a positive affect on climate change.</p> <p>There is also a need to ensure that within new development measures are taken to ensure we conserve energy and protect the natural environment, for example taking steps towards the Code for Sustainable homes.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>For information, the Sustainable Energy Strategy for the region reinforces relevant policies from the RSS but more importantly offers important practical advice and information on taking these issues forward.</p>	<p>Agreement noted.</p>
CSIO/54	Ms Samantha Turner Principal Planning Officer 4NW	<p>4NW's stance on sustainable waste management is a mix of policy which is set out in the RSS and also Regional Waste Strategy for the North West (RWS). The approach contained within these strategies should be viewed as a whole.</p> <p>4NW would agree that the Core Strategy Issues and Options Paper has correctly highlighted the key issues facing Warrington with regards to sustainable waste management, including dealing with its own and imported waste arisings, ensuring sufficient provision of waste management facilities and identifying suitable sites for new or enhanced waste management facilities.</p>	<p>Comments noted. The Key Issues have been expanded to recognise the historic environment and this will be reflected in future documents.</p> <p>Comments regarding the evidence base are noted. Conservation Area Appraisals are currently being undertaken and Warrington has a list of locally significant buildings.</p> <p>Comments regarding the objectives are noted. The objectives will be recast and reviewed in the light of consultation responses.</p> <p>Comments regarding the development management policies are noted. Once the Core Strategy is in place, it will be appropriate to review existing and required Supplementary Planning Guidance and Supplementary Planning Documents.</p>
CSIO/57	Judith Nelson English Heritage	<p>The Government has made it clear that protecting the historic environment is a key objective in delivering sustainable development. Heritage protection is an integral part of the planning system and an essential element of building sustainable communities and contributing towards social well being.</p> <p>The historic environment can create and support sustainable communities by providing:</p> <ul style="list-style-type: none"> • a sense of place and continuity, local distinctiveness and community identity and a source of civic pride; • an important social and economic asset as a cultural resource for learning, recreation and enjoyment and a generator of tourism and inward economic investment; • places that tend towards an efficient use of land through mixed use; • opportunities for regeneration and economic development through the reuse of historic buildings; and • opportunities to reduce construction waste and carbon emissions and avoid energy use through the reuse of durable traditional buildings and building materials. <p>The historic environment whilst constantly changing, re-asserting and re-establishing its relevance, represents a finite resource. If it is not sustained, not only are its intrinsic heritage values eroded or lost, but so is its potential to provide all of these benefits to sustainable communities.</p>	

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		<p>The Core Strategy should shape and sustain the historic environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same. Changes that would harm the heritage values of a significant place should be understood as undesirable and avoided. Core Strategies need to provide the framework to demonstrate how the historic environment and individual assets will be managed.</p> <p>In introducing the Core Strategy the Report describes it as providing a guide to regeneration and the promotion of environment well-being. The Key Issues include Safeguarding and Enhancing Environmental Assets however a very narrow and partial view is taken of the borough's environmental assets with no mention of the historic environment. The borough's conservation officer should be involved in the identification of key issues for the historic environment.</p> <p>English Heritage would expect the evidence base to identify how the historic environment contributes to the local identity and distinctiveness of Warrington and how might it contribute to the achievement of economic and social objectives. Conservation Area Appraisals would form part of this evidence base.</p> <p>The Vision for the Core Strategy includes reference to the unique elements of the built environment and is assumed that this would encompass heritage assets. It is important however to have a wide definition of the historic environment which covers locally valued and important historic environment features as well as those with statutory designation.</p> <p>The report suggests four sets of objectives however there is nothing relating to the historic environment. All Core Strategies should either include a specific objective for the historic environment or one that refers to the historic environment as part of a broader environmental objective or part of an objective promoting local distinctiveness. Whichever choice is made the plan must set out a subsequent framework to demonstrate how the historic environment will be managed in the area. The objective should not repeat national guidance, but should be tailored to create locally relevant and place-specific objectives for the historic environment.</p> <p>It will be important in developing the development management policies that existing useful guidance is not lost, such as the SPG on Shopfronts and Advertisements. It will be necessary to consider what additional guidance will be needed to supplement the development management policies in order to deliver high quality design building on local distinctiveness.</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/123	Mr John Coxon Emery Planning Partnership	<p>Emery Planning Partnership is instructed by various clients to submit representations to the above consultation document.</p> <p>We note that the plan is at a very early stage, but there are a number of issues which we wish to make comments on. The main issues are:</p> <ul style="list-style-type: none"> • Housing Requirement; and, • Housing Distribution. 	<p>Warrington's housing figure is passed down from the Regional Spatial Strategy. It is recognised that the RSS figure is now considered to be an annual average and not a ceiling for housing number provision. The policy states that the figures "may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub regional strategies". This has been Warrington's approach since the adoption in 2006 of the Unitary Development Plan and the adoption in 2007 of the Managing the Housing Supply Supplementary Planning Document.</p>

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		<p>Table 1 (page 8, Appendix EPP1) of the NHPAU report sets out minimum and maximum delivery rates for each of the regions. As will be noted the minimum delivery rate for the North West to 2026 is 26,600, although by 2016, the minimum delivery point should be 27,600. This is an increase of 16% or 4,489 households over the current RSS. The upper delivery rate for the North West to 2026 is 29,500, although by 2016, the projected delivery point should be 31,300. This is an increase of 26% or 8,189 households over the current RSS.</p> <p>This indicates a significant upward trend in housing provision. It is not the purpose of this representation to rewrite the RSS/Core Strategy housing requirement, but that in supporting our view that additional sites are required in addition to those already allocated, there is clear statistical justification with the upward trend in housing need. As the DPD is to plan for new housing to 2030 these figures should not be ignored. Clearly additional sites can be phased so that their release is delayed until a new RSS requirement is adopted.</p> <p>This can be achieved through the use of safeguarded land in the emerging LDF.</p> <p>Growth Point Status</p> <p>With the Growth Point status now confirmed, the annual requirement will increase by 20% to 418. As indicated above, we consider that there is clear statistical evidence that this figure will increase significantly as the new RSS emerges. The growth point status gives a clear emphasis on meeting Warrington's future housing requirements and needs.</p> <p>Non Delivery of Commitments</p> <p>When it comes to allocating sites, provision needs to be made for sites that may not come forward for development, as well as reductions in the housing stock (for example, through demolitions). We note that the council is currently still maintaining its position that it has a deliverable 10 year supply of housing land. On this basis, it is our understanding that the council is neither allocating sites for housing through the Core Strategy, nor producing a 'Site Allocations' DPD.</p> <p>The housing land supply figures rely heavily upon the development of flats, particularly in Central Warrington. We have serious concerns as to whether these sites will actually be developed in the current market. Even if the recession was to end, there is evidence that the desirability of flats has decreased significantly.</p>	<p>currently within the planning system, i.e. benefit from extant consents. The evidence provided by the document will help to determine whether there is already sufficient flexibility within the sites available or whether further measures such as allocations are necessary.</p> <p>Support for Strategic Option 3 noted but premature at this stage of the process. An evidence based assessment of these issues will be undertaken at the next stage of the process.</p> <p>Comments regarding prejudicing the LDF process are noted. However, the Regional Spatial Strategy states that there should be no strategic Green Belt boundary review in Warrington before 2021, which is the basis of the presumption that the Green Belt boundary will remain for of the life of the Core Strategy (which looks to 2026). The evidence collected for the Core Strategy will determine whether this is an appropriate assumption or whether smaller scale boundary changes need to be considered.</p> <p>RSS also places a clear focus on regeneration and seeks to protect open land from development.</p> <p>Comments regarding Section 106 agreements are noted.</p>

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		<p>Our own clients have advised that they will only be interested in sites which can deliver a significant proportion of family housing. Developers are unlikely to build flats at the rates seen previously, irrespective of existing planning permissions. The viability of the delivery rate the council is currently relying upon must be questioned.</p> <p>We are aware that a number of the major schemes in Warrington now have little prospect of being delivered particularly those involving mixed use with a high proportion of apartments.</p> <p>Thus flexibility must be built in to allow for this type of slippage.</p> <p>Soundness of the DPD</p> <p>On the basis of the above, it is a significant risk by the council not to make strategic housing allocations either in the Core Strategy or a specific Allocations DPD. Para 4.52 of PPS12 states that to be sound, a core strategy must be:</p> <ul style="list-style-type: none"> (i) Justified (ii) Effective (iii) Consistent with national policy <p>The Planning Inspectors advice, outlined in <i>Examining DPDs: Soundness Guidance</i>, clearly states that in order to meet test ii (effective), the DPD must be flexible enough to respond to unexpected changes, and changes to the RSS. Specific reference is made to being flexible enough to respond to changing housing figures.</p> <p>If the Warrington LDF is to proceed as we currently understand it will do, e.g. without housing allocation sites either within the Core Strategy or a separate DPD, it will clearly not have the inbuilt flexibility to deal with the increase in household projections and the non-delivery of commitments.</p> <p>Housing Distribution</p> <p>The consultation document invites representations to be made regarding the distribution of future housing, and how Warrington will deliver a level and type of housing to meet the boroughs objectives. We consider that there are three clear issues we wish to make representations on:</p> <ul style="list-style-type: none"> • Vision for the Core Strategy; 	

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<ul style="list-style-type: none"> • Strategic sites and development options; and, • Prejudicing the LDF process. <p>Vision for the Core Strategy</p> <p>Question 2 is concerned with the appropriateness of the vision for Warrington. We would question whether the vision has enough emphasis on housing. Specifically, the vision should explicitly state that as well as providing high quality, safe, secure and inclusive living environments, these living environments will be where people want to live. This is a necessity if Warrington harbours ambitions of meeting its overall vision of being "recognised as one of the best places to live and work in the UK where everyone enjoys an outstanding quality of life".</p> <p>In the recent past, policy has directed housing into Central Warrington. The housing restriction policy that has been in place has emphasised this. Whilst we agree that the development of central Warrington should be continued, we consider that an over reliance would compromise the borough meeting its Vision for the Core Strategy'.</p> <p>Strategic sites and development options</p> <p>Questions 4 and 5 relate to the assembly of strategic sites, and their respective policy approaches. Broadly, we agree with Strategic Option 3. Development should be promoted on suitable and available sites within the borough. If Warrington is to rely too heavily on meeting its annual housing requirements through inner Warrington brownfield sites, it may be in a position to meet these numbers but not be able to fulfil the overall vision.</p> <p>However, an over reliance on these sites cannot meet the requirements for family housing, of which there is a recognised shortage at national and local level. We note that there is also no mention of a rural renaissance within the document.</p> <p>In Warrington, the Strategic Housing Market Assessment identifies that there is a clear need for two-bedroom, and in particular four-bedroom, owner-occupied and social-rent houses. The study also recognises that Warrington has house prices above the North-West average, and first time buyers struggle to get onto the housing market.</p> <p>Therefore we consider these issues need to be addressed through the Core Strategy. We believe that only though development outside of inner Warrington combined with some within , and in strategic locations through the release of greenfield / Green Belt land, can these requirements be met.</p>	

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		<p>Prejudicing the LDF process</p> <p>We note that 'Maintaining the Green Belt Beyond 2021' is identified as a key objective in the policy. Similarly, 'The countryside and its constituent settlements' are excluded from all development options in section 9. We do not question the principle of urban regeneration, and we acknowledge that the maintenance of the Green Belt is an objective of PPG2. We do however question the predetermined view that the Green Belt boundary is to remain.</p> <p>In essence prejudging the LDF process at this early stage is contrary to the purpose of this stage in the process, which should in our view consult on a wide range of possibilities, one of which would be Green Belt releases. Therefore the Preferred Options stage should include a broader range of options for consultation, with specific regard to the above.</p> <p>Conclusion</p> <p>There is clear statistical evidence of an upward trend in housing projections, which will heavily influence any future review of the RSS. We also have grave concerns over the deliverability of Warrington's current housing commitments. We therefore consider it essential that Warrington allocates land for housing either through the Core Strategy, or a specific 'Allocations' DPD.</p> <p>Meeting Warrington's future housing needs, and to match the ambitious vision set out in the core strategy, will require the allocation of land for family and affordable housing, in particular two-bedroom and four-bedroom properties. We propose that this cannot be met purely through previously developed land within inner Warrington, and consider that the council should consider promoting development outside of inner Warrington, including the strategic release of greenfield and Green Belt sites for housing.</p> <p>Other matters</p> <p>As part of the LDF process we would also ask that serious consideration be given to the way planning gain is dealt with. The inclusion of onerous off-site contributions as part of Section 106 agreements has been a known negative factor in the delivery of major sites not only in Warrington but elsewhere in the Northwest.</p>	<p>The 2006 Retail and Leisure study is currently being updated through a new household survey. This will provide the</p>
CSIO/126	Laurie Lane CBRE	<p>1.1 CBRE Planning is instructed by First Alliance Properties to promote their site in Gemini Business and Retail Park as an extension to the existing shopping provision. The Park is currently a mix of office, light industrial and retail with occupiers such as Marks & Spencer, Toys R Us and Ikea.</p>	<p>The 2006 Retail and Leisure study is currently being updated through a new household survey. This will provide the</p>

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First Alliance Properties	<p>1.2 First Alliance Properties understands that Warrington Borough Council's retail study published in 2006 concluded that there is a quantitative and qualitative need for additional comparison goods floorspace in Warrington, but in the short term (2011), this is entirely accounted for by committed floorspace. However, the study states that in the longer term (2016), much of the quantitative and qualitative need could be taken up by mixed-use pipeline schemes that should be designated in the Local Development Framework (LDF).</p> <p>1.3 It is to our client's view that their site in Gemini Business and Retail Park should be allocated as retail use, therefore, there is the need for First Alliance Properties to participate in the consultation of the emerging LDF documents.</p> <p>1.4 This document provides representations and observations towards the Council's Core Strategy Issues and Options Paper published on 2 February 2009.</p> <p>Site Background</p> <p>1.5 The site is located on Europa Boulevard within the Gemini Business and Retail Park which lies just to the north of Warrington town centre. The Park lies adjacent to junction 8 of the M62 motorway and near to the A49 dual carriageway.</p> <p>1.6 The site is situated on the north side of Europa Boulevard, with other occupiers within the immediate surrounding area including Marks and Spencer, Ikea and Toys R Us. There is also a BP Express Petrol Filling station situated nearby.</p> <p>1.7 The property comprises a single storey warehouse, originally constructed in 1990 by AMEC Developments. To the front of the building, there is a main service yard with two access roads at either end of the site together with a staff/customer parking area for approximately 79 vehicles. Currently, the property is occupied by the electrical company, Newey and Eyre.</p> <p>1.8 The site area is approximately 1.904 hectares.</p> <p>Site Allocations</p> <p>1.9 The site is covered by Policy EMP4 in the adopted Warrington Borough Council Unitary Development Plan (UDP) (January 2006). The Policy states the following:</p>	<p>evidence as to whether it will be necessary to make allocations for new retail floorspace within the plan period. If allocations are necessary these will be made in accordance with national guidance and will follow the sequential approach set out in PPS6.</p> <p>It is therefore premature to consider site specific representations for retail allocations.</p>	

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		<p>"The Council will approve planning applications for development, redevelopment and changes of use within existing employment areas as shown on the Proposals Map, provided that the use falls within Use Classes B1, B2, or B8, or is a sui-generis employment use, or other appropriate use that will contribute to the local economy, and provided that: -</p> <ul style="list-style-type: none"> • the development provides for access in accordance with the transport priorities set out in policies LUT1 and LUT2 to prioritise walking, public transport and cycling and minimise new trips by car, and will not materially worsen traffic conditions or adversely affect road safety; • there is no detriment to the amenity of people living or working nearby, or to the effective use of other nearby land; and • in cases of new development or redevelopment, the design and appearance of the development relates well to its setting and the character and quality of the local environment in terms of its scale and density, its height and massing, its landscape and layout, and its use of materials." 	<p>Conclusion</p> <p>3.1 First Alliance Properties supports the overall objective of the Core Strategy Issues and Options Paper.</p> <p>3.2 Warrington's vision is that it will be recognised as one of the best places to live and work in the UK where everyone enjoys an outstanding quality of life. The Council states that by 2030 Warrington will be firmly established as an outstanding place in the North West, fulfilling a key role in the regional economy and is a location of choice for national and international business.</p> <p>3.3 The Warrington Retail Study published in July 2006 recognises Gemini Business and Retail Park as a popular destination for shoppers as the Park is easily accessible and provides free car parking.</p> <p>3.4 Unit 1120, First Alliance Properties' site, is located within Gemini Business and Retail Park and adjacent to large format retail stores such as Marks and Spencer, Ikea and Toys R Us. Even though a large number of sites within the Park are operating under retail use, the Park is allocated as 'existing employment site' in the adopted UDP.</p> <p>3.5 A retail allocation of Unit 1120 will allow a greater synergy between the unit and the rest of the Gemini Business and Retail Park. The Ikea and Marks and Spencer stores are recognised as key attractors. The addition of further large format retail floorspace within the Gemini Business and Retail Park will assist in stemming identified leakage from the borough.</p>

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		<p>3.6 First Alliance Properties fully supports the Council's view that there is a need to assess the capacity for more retail floorspace, whether there is a market for additional housing and what the appropriate balance should be between office provision in the town centre and the periphery of the town.</p> <p>3.7 The Council states in the Issues and Options Paper that the Core Strategy will focus on the delivery of sustainable development and high quality design in the Borough and will set the context for the negotiation of planning obligations. First Alliance Properties is fully committed in working with the Council in order to achieve this.</p> <p>3.8 As discussed, the addition of further large format retail floorspace within the Park will assist in stemming identified leakage from the borough. This will in turn reduce the need for shoppers to travel beyond the borough for comparison goods, something which is currently considered unsustainable. There will be benefits in grouping retail floorspace as more linked trips can be made and number of trips by car will be minimised outside the town centre. This is particularly relevant in Gemini Business and Retail Park as it is a well-established and popular retail location in Warrington.</p> <p>3.9 Lastly, Gemini Business and Retail Park is strategically located on the M62 between Junction 8 and 9, making it a highly accessible and sustainable location for further retail floorspace. The retail allocation of Unit 1120 is therefore wholly consistent with the aspirations of Planning Policy Statement 1: Delivering Sustainable Development.</p>	<p>The 2006 Retail and Leisure study is currently being updated through a new household survey. This will provide the evidence as to whether it will be necessary to make allocations for new retail floorspace within the plan period. If allocations are necessary these will be made in accordance with national guidance and will follow the sequential approach set out in PPS6.</p> <p>It is therefore premature to consider site specific representations for retail allocations.</p>
CSIO/141	Nicola Sewell Indigo Planning Prudential Pensions Ltd	<p>Indigo Planning Limited (Indigo) act on behalf of Prudential Pensions Limited ("Prudential") who are the owners of Pinners Brow Retail Park, and the units occupied by Next and Boots at Gemini Retail Park, Europa Boulevard, Warrington.</p> <p>In summary, we request that the positive role and functions of existing retail parks are recognised in the economic objectives summarised at Section 5 of the CSIO, linked to their complimentary relationship with the established shopping centres highlighted, and their benefit to the local economy. In terms of the strategic sites set out in Figure 6.1 we welcome confirmation that Pinners Brow Retail Park is situated within the Regeneration Area (alongside the Riverside Retail Park). We also support Strategic Option 2 which prioritises development within the Regeneration Area, whilst enabling promotion of development within the 'suburban' areas of the town (Gemini).</p>	<p>Prior to responding to the specific aspects of the Core Strategy Issues and Options the following sets out the context of Pinners Brow Retail Park and Gemini Retail Park.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Pinners Brow Retail Park Pinners Brow is located off Pinners Brow, to the immediate north of Warrington Town Centre. The site falls within Policy EMP8 on the UDP Proposals Map; 'Winwick Street/Winwick Road (west) Area', and is the subject of a site specific SPC which was adopted by the Council in February 2004. The SPC identifies a number of key aims for the Winwick Street area, which include the need to provide a mix and variety of uses which "...supplement the existing diversity of the town centre and its surroundings" (para. 8.1).</p> <p>The site is also located within allocation EMP5 of the Warrington UDP. The boundaries of the Regeneration Area set in the Core Strategy Issues and Options have been drawn to reflect the boundary of allocation EMP5.</p> <p>Pinners Brow Retail Park comprises 4 retail units currently occupied by Storey Carpets, Wickes, Walter Wall Carpets and CSL, and 1 vacant unit.</p> <p>The Retail Park is situated in a highly accessible location, being approximately 200m and 350m north of Warrington Train and Bus Station (respectively). The site is also located approximately 2 miles south of Junction 9 of the M62.</p> <p>Next and Boots, Gemini Retail Park, Europa Boulevard</p> <p>The units occupied by Next and Boots at Gemini Retail Park are approximately 2 miles north of Warrington Town Centre. This site forms part of a wider retail park which comprises a number of other retailers including Ikea, Marks & Spencers and Porcelanosa.</p> <p>The site is situated in a highly accessible location as it is within walking distance (i.e. 300m) from the bus terminus, which provides a regular service to Warrington Town Centre, the bus interchange and Warrington train station. The site is situated in the suburban area as set out in Figure 6.1 of the Core Strategy Issues and Options.</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/75	Miss Rachael A. Bust Deputy Head Planning and Local Authority Liaison Department The Coal Authority	<p>Surface Coal Resources and Prior Extraction</p> <p>The northern perimeter of Warrington contains coal resources which are potentially capable of extraction by surface mining operations. This information is available to Mineral Planning Authorities free of charge from The Coal Authority following signing a data sharing licence. It is acknowledged that this only affects a small proportion of the plan area and as such is not an issue likely to be affected by the spatial options chosen in the Core Strategy.</p> <p>The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In cases 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.</p> <p>As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.</p> <p>We do NOT wish to see any changes in the Core Strategy in relation to mineral safeguarding.</p>	<p>Comments noted. A minerals assessment is being undertaken as part of the Core Strategy evidence base. This will inform the Core Strategy approach.</p>
CSIO/122	Mr Simon Artiss Bellway Homes	<p>First, the context for the Core Strategy is the adopted RSS. For Warrington Borough, this sets a minimum target for new homes (net) of 6,840 in the period to 2021 with at least 80% to be on previously developed land (PDL). This is your Core Strategy target, being a minimum of 380 new homes (net) each year. The RSS places Warrington as within what it refers to as 'Mid Mersey' and Paragraph 7.18 of RSS states that '<i>in Warrington the focus will be on housing provision which meets local and affordable housing needs and development in support of agreed local regeneration strategies'</i>';</p> <p>RSS Policy MCR6 sets out the strategic framework for Warrington and states that Warrington's Core Strategy must: support sustainable economic growth; focus development on sites that are accessible by public transport, walking and cycling and accord with other relevant RSS policies on spatial planning, with development focusing '<i>particularly on Brownfield sites to ensure no further significant expansion onto open land</i>'; furthermore, Warrington is part of the successful Growth Point bid along with Halton and St Helens Councils. This seeks to deliver an additional 6,500 to 7,700 new homes over and above RSS targets. The focus is on regeneration and bridging the affordability issue as well as supporting growth in Warrington;</p>	<p>Comments and support for the delivery of new homes as a priority noted.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		Within this context, the Council has prepared the Issues & Options Paper. We support Section 2.3 and the drive towards the delivery of more new homes as a priority. It raises the existing policy focus upon regeneration, which is supported, although the Core Strategy must strike a balanced approach if it is to deliver these new homes;	
CSIO/90	Gerry McCann Croft Parish Council	The Parish Council welcomes the many references in the report to the fact that the Green Belt in Croft will be kept intact.	Comments noted.
CSIO/119	Lisa Henderson Highways Agency	<p>The Parish Council is of the opinion that Croft already has its quota of affordable housing, especially as there is to be further such housing provided in the centre of the village on the site of the former Croft House. Any further affordable housing cannot be supported due to the lack of facilities in the village.</p> <p>The comments in this response take account of the Highways Agency policy outlined in Department for Transport (DfT) Circular 02/2007 'Planning and the Strategic Road Network' which sets out how the Agency should deal with emerging Local Development Frameworks as a consequence of the Planning and Compulsory Purchase Act 2004.</p> <p>The Secretary of State for Transport (referred to as the Secretary of State) is the highway authority for the Strategic Road Network (SRN) roads in England. In carrying out the policies of the Secretary of State, the Agency has to ensure that the safety and free flow of traffic on the trunk road in England is not prejudiced by new developments proposals.</p> <p>At a strategic level this is done by reviewing development plans to ensure that the potential demand for travel generated by future allocations does not compromise the safety and the level of service afforded to existing users of the SRN to an unacceptable degree. In this role, a key function of the Agency is the management and operation of the trunk road network to make best use of the existing infrastructure provisions.</p> <p>The Agency would like to see new developments promoted at sustainable locations with appropriate demand management measures incorporated in to the proposals. We would also like to engage with Local Planning and Highway Authorities in order to facilitate better integration of demand management between the strategic and local road networks as allocated sites are developed.</p> <p>The Agency would like to work with local authorities, developers and public transport operators to take greater account of transport options that are sustainable, including those that can be secured through the use of planning conditions and obligations. However, there is a need to be satisfied that any sustainable</p>	Comments noted.

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		<p>initiatives being put forward as part of a development proposal are realistic, will achieve the required targets of public transport use and can be delivered in practice prior to such a development coming into use.</p> <p>The SRN within Warrington is comprised of sections of the M6, M62 and M56. These routes are deemed to be of national importance and therefore if any proposed development sites or land allocations were to have an adverse impact upon their safety and / or operation the Agency would potentially raise concerns.</p>	<p>Comments regarding the objectives are noted. The objectives will be recast / redrafted as a result of consultation responses.</p> <p>Support for the town centre being the focus for shops, civic, cultural and entertainment activities noted.</p>
CSIO/124	Rose Freeman The Theatres Trust	<p>The Theatres Trust is the national advisory public body for theatres and a statutory consultee on planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old and new, in current use, in other uses, or disused. Established by The Theatres Trust Act 1976 <i>'to promote the better protection of theatres'</i>, our main objective is to safeguard theatre use, or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.</p> <p>Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore expect to see matters relating to cultural facilities.</p>	<p>Aspiration for protection for continued theatre use noted. Cultural facilities will be considered as part of the Infrastructure planning process that will support Core Strategy production.</p> <p>We note the item quoted from the Sustainable Community Strategy at 3.2 under the heading 'Our People' regarding <i>Benefit from plenty of leisure and cultural activities for young and old</i> and the first bullet point under the heading 'Our Environment' ...<i>providing entertainment, cultural facilities, homes</i> but the aspiration regarding 'cultural activities/facilities' is not reflected in the Economic Objectives at 5.2 on page 7 (no page numbers). We suggest for clarity and continuity the inclusion of the word 'cultural' after 'leisure' to read <i>from Warrington town centre as the location for the concentration of retail, office, leisure, cultural and recreational development</i>.</p> <p>We support the statement at 8.1 that the town centre should be the focus for shops, civic, cultural and entertainment activities. Cultural and leisure facilities that are likely to attract large numbers of visitors should in the first instance be clustered within the town centre and have good accessibility to the public transport network. Locally important cultural facilities should be protected and enhanced where they contribute to wider regeneration.</p> <p>The Trust particularly requests that the document provides sufficient protection to ensure continued theatre use within the area, particularly where buildings for performance arts may not be covered by listing or conservation area designations, or may be affected by proposals which come forward for development sites. This should include performing arts facilities that stand-alone, are part of other facilities, or are contained within educational or community buildings.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/144	Clare Oliver The Mersey Forest	<p>The Mersey Forest is an environmental regeneration initiative creating woodlands and involving people across Merseyside and North Cheshire. The Mersey Forest Partnership includes seven local authorities (Cheshire West and Chester, Halton, Knowsley, Liverpool, Sefton, St.Helens and Warrington) as well as the Forestry Commission, Natural England and businesses including United Utilities.</p> <p>The Partnership works to the 30-year Mersey Forest Plan, written in 1994 and updated in 2001. The Plan sets a target of creating 8,000 hectares of new community woodlands over its 30 years, bringing a wide range of environmental, economic and social benefits. The plan is advisory and seeks to bring about changes to the character and landscape of North Cheshire and Merseyside. This provides a framework for each local authority district, enabling the implementation of policies and opportunities for changing land use. Since 1994 the Partnership has planted over 8 million trees and brought more than 70% of the woodlands in the Forest into management to secure their long-term future.</p> <p>Networks, such as The Mersey Forest, of woodlands and other habitat are increasingly being recognised as part of our green infrastructure.</p> <p>The Mersey Forest Team welcomes the opportunity that Warrington has taken to include green infrastructure within its Local Development Framework. A strong green infrastructure policy within the Core Strategy, with back up within Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), will help to realise The Mersey Forest Plan. The Mersey Forest, as an existing and effective partnership, should be identified as a key green infrastructure delivery mechanism.</p> <p>This Green Infrastructure Core Strategy should be spatially articulated using a green infrastructure plan, identify delivery mechanisms, and use developer contributions to aid delivery. The Mersey Forest Plan is a key mechanism for delivering green infrastructure in the borough:</p>	<p>Comments and support for approach noted. Further work will be undertaken to map and understand Green Infrastructure within Warrington to support the Core Strategy approach.</p> <p>Comments regarding Green Belt boundary changes and energy need are noted.</p> <p>The policy framework set out in the Unitary Development Plan has facilitated the investment referred to and acknowledges that very special circumstances would need to be demonstrated to allow further land to be</p>
CSIO/156	Chris Brake Dalton Warner Davies Scottish and Southern Energy	2. Previous owners of Fiddler's Ferry submitted objections during the consultation process of the Warrington UDP (WUDP), culminating in evidence being given before an inspector in January 2004 in which it was contended that land should be designated for purposes that would enable further development to occur in connection with the use of the site for energy related purposes. It was explained that there was a strong business case for the continuing operation of the plant in producing electricity, with potential for various forms of development including, co-firing coal with other renewable fuels, eventual re-powering, building alternative electricity generating technologies, introducing greater flexibility in fuel supplies and the means of delivery, additional rail infrastructure, ash processing and environmental improvements.	

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		<p>3. Since July 2004 when SSE acquired Fiddler's Ferry it has obtained consent from Government to install flue gas desulphurisation (FGD) to three of its four units, which will be operational this year; and it has worked with Rocktron to build an ash processing plant, that is currently being commissioned. SSE also proposes to begin an EIA process to assess the effects of developing improved rail facilities at the site and is conducting a front end engineering design study to assess the potential for further environmental improvements to improve the quality of emissions from the power station.</p> <p>4. The effect of building the FGD project and the ash processing plant is that it has now used land on the east side of the site, which at the time of the WUDP public inquiry was available for development. It now has further plans for investment in rail infrastructure and other improvements, which will require that land is identified to undertake this and other energy related development at Fiddler's Ferry. It was recognised by the inspector at the WUDP inquiry, that while he felt there was ample land within the operational area of the power station to allow for future development, there might be a time, if very special circumstances were demonstrated, to allow land from the Green Belt to be used for purposes related to the operation of the power station. Our clients believe that the LDF process necessitates bringing this to the Council's attention.</p> <p>Green Belt</p> <p>5. The land to the east of the main power station and the land to the south of the railway line, where the ash lagoons are located is designated Green Belt. The Green Belt boundary was affirmed by the adoption of the WUDP in 2006. Policy RDF4 (Green Belt) in the North West of England Plan Regional Spatial Strategy to 2021 (2008) (RSS) states that 'Overall the general extent of the Region's Green Belt will be maintained' and that 'There is no need for any exceptional substantial strategic change.....', however it also acknowledges that other more location specific detailed boundary changes may be required to meet exceptional purposes. (paragraph 5.26).</p> <p>6. The circumstances are that, whereas as recently as 2004 the WUDP inspector felt there was sufficient land within the operational area of the power station to accommodate development, there has since been substantial major investment which has taken up nearly all the available area on the east site of the power station. Even to undertake further major environmental improvements at the site would require a substantial area of land for contractors lay down and delivery/parking.</p> <p>7. The RSS contemplates that where such changes would not require a reconsideration of wider green belt boundaries through a strategic study and would comply with guidance in PPG2, they should be dealt with through the LDF process. This is a situation where Fiddler's Ferry power station, which contributes substantially to the provision of energy in the North West must look forward to its need to plan for future investment even in the near term.</p>	<p>excluded from the Green Belt. The framework offers clear support for development related to the operation of the power station.</p> <p>The Core Strategy process will have to further investigate how future investment at Fiddlers Ferry can be accommodated and whether an examination of small scale boundary changes is appropriate in this location.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Energy Need</p> <p>8. Government is aware that a substantial proportion of the UK's generating capacity will close over the next few years. DECC's 2007 and 2008 Energy Markets Outlook Reports (EMOR) note that as a consequence of the Large Combustion Plants Directive (LCPD), plants which opted out would have to close by the end of 2015, or after 20,000 hours of operation after 1.1.08, whichever is the sooner. The latest EMOR refers to the LCPD requiring large generation plants to meet more stringent air quality standards, meaning that around 12 GW of coal and oil fired generating plant which "opted out", would have to close by not later than the end of 2015 and similarly around 7.3 GW of nuclear capacity by 2020</p> <p>The conclusion is therefore drawn that in the "medium term as plants start to close, the electricity generating industry faces a substantial challenge in ensuring delivery of the new generating capacity that will be needed if Britain is to maintain security of supply at similar levels to those so far enjoyed" (EMOR 2008, paragraph 4.9.1).</p>	
CSIO/184	Lewis Evans Turley Associates	<p>Conclusions</p> <p>9. Fiddler's Ferry is in a unique position to support the provision of investment in generating capacity within the North West of England, both in the use of carbon based fuels and renewable forms of energy generation. It is therefore requested that the Council considers a way forward to identify land within SSE's property holding that will enable future investment to occur. One option would be for the strategic nature of the site to be formally recognised. This should be incorporated in the Core Strategy bearing in mind also that the power station contributes substantially to security of energy supplies in the North West. Both directly and indirectly, Fiddler's Ferry is a major employer, with a skilled workforce, comprising engineering, environmental and business personnel; it is also a substantial provider of training positions.</p>	<p>Comments noted.</p> <p>Birchwood is a key and integral part of the business community in east Warrington and the wider Borough with Birchwood containing the largest concentration of employment within the Borough, supporting over 300 companies employing almost 18,000 people. Birchwood Park is a key component of this; it comprises a 123 acre mixed-use business park with over 1,100,000 sq ft of commercial floorspace across a variety of building types and sizes, on flexible lease terms, in a location which is attractive, secure and accessible. Over 4,000 people are employed within the Park. It has associated amenities which support and enhance its offer including a conference centre, restaurant, health and fitness club and nursery.</p> <p>MEPC Birchwood Park is committed to the long-term ownership and improvement of the Park. The overall objective is to develop Birchwood Park into Warrington's premier business park and a business park of regional importance. This commitment is reflected by the level of MEPC's investment with over £75m being invested since 1998 and a further amount in excess of this over the next 10 years.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Recent development within Birchwood Park has taken place with the context of a 10 year outline planning permission which sees out the long term phased redevelopment of the Park which was to comprise of almost 1000,000m² of office, research and development uses, industrial and warehousing space. The outline permission provides a strategic framework in order for MEPC to realise their aspirations for the park.</p> <p>MEPC's commitment and significant investment has been justified to date with Birchwood Park playing a key as a market leader in the region, consistently attracting inward investment to Warrington. This has included prestigious and high profile employers such as</p> <ul style="list-style-type: none"> • Atkins • Department of Work & Pensions; and • Serco <p>It is against this context of sustained investment in Birchwood Park and MEPC's ongoing commitment to it that MEPC wishes to comment on the Core Strategy Issues and Options Paper.</p>	<p>Comments noted. It is acknowledged that Birchwood is a very important component of the forward supply of employment land in the borough that will continue to be supported.</p>
CSIO/185	Lewis Evans Turley Associates	<p>The Core Strategy identifies a number of key issues including 'Sustaining Economic Success', in terms of appropriate levels and locations of employment and making the right education and skills available and 'Addressing inequalities' in terms of levels of deprivation. As demonstrated above, Birchwood and Birchwood Park have been instrumental in achieving recent economic and regeneration success for Warrington and must be allowed to continue to do so. It is, therefore, wholly appropriate these achievements by should continue to be fostered and developed and should underpin any emerging strategy.</p> <p>Providing enhanced employment opportunities and improving access to employment opportunities in Birchwood (both in terms of the availability of jobs and transport provision to these opportunities), has contributed to and will continue to contribute to addressing inequalities.</p> <p>It must be recognised that in order for areas such as Birchwood to continue to play a significant role in supporting the economy of Warrington it must have long term support, including planning policy support.</p>	<p>Comments regarding the biodiversity duty are noted. Similar comments have been raised in respect of the Core Strategy Sustainability Scoping Report.</p>
CSIO/155	Janet Belfield Natural England	Biodiversity Duty	<p>Biodiversity is a core component of sustainable development, underpinning economic development and prosperity, and has an important role to play in developing locally distinctive and sustainable communities. From 1 October 2006, all local authorities and other public authorities in England and Wales have a Duty</p>

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		<p>to have regard to the conservation of biodiversity in exercising their functions. The Duty aims to raise the profile and visibility of biodiversity, to clarify existing commitments with regard to biodiversity and to make it a natural and integral part of policy and decision making.</p> <p>The Duty is set out in Section 40 of the Natural Environment and Communities Act (NERC) 2006 and states that:</p> <p><i>"Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity".</i></p> <p>This is a new duty for Local Authorities and we would expect to see a reference to it in all relevant planning documents. Guidance is available in the Defra publication, Guidance for Local Authorities in Implementing the Biodiversity Duty, http://www.defra.gov.uk/wildlife-countryside/pdfs/biodiversity/a-guide-english.pdf</p> <p>The Issues and Options report makes no reference to the Duty and we would welcome additional text to highlight how the Duty affects the Council. This document should demonstrate how the Council applies the Duty to its planning functions.</p> <p><u>Habitats Regulations Assessment (HRA)</u></p> <p>Amendments have been made to the Habitats Regulations to reflect recent clarification of the status of land-use plans as 'plans or projects' under Article 6(3) & 4 of the Habitats Directive. Natural England is awaiting further guidance on how Habitats Regulations assessment procedures will need to be applied specifically in the case of Local Development Frameworks. In general terms, this means that if a land-use plan is likely to have a significant effect, alone or in combination, on one or more European sites (SACs, SPAs) it must be subject to an 'appropriate assessment'.</p> <p>We recommend that consideration be given to Habitats Regulations Assessment (HRA) requirements at an early stage in the development of your Core Strategy, and look forward to your consultation on the screening report in due course. We encourage work to be undertaken on this alongside any drafts or sustainability appraisal and used as another method to assist with screening out incompatible options.</p> <p>We consider that where assessment is deferred to the preferred options stage which whilst acceptable an opportunity is missed to use the HRA Screening as another tool to work up any preferred option. We always recommend starting this work at the earliest possible stages of plan production. We will be pleased to discuss this further if required.</p>	<p>Documents produced in future will have regard to the Biodiversity Duty as set out.</p> <p>Comments regarding Habitat Regulations Assessment are also noted. A Screening assessment will be undertaken in due course and will be sent to Natural England for comments.</p>

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		<p>Paragraph 3.2 of the DCLG guidance recommends: "We recommend that AA should be undertaken in conjunction with the SA. It would be best practice to maximise the relevant evidence gathered in the SA and to use it to inform the AA and vice versa. SA and AA outputs must be clearly distinguishable and reported on separately." This is practice that we too encourage.</p> <p>Sections 10.6 to 10.8 state that you will scope out whether an Appropriate Assessment if required. We refer to this as a Habitats Regulations Assessment Screening exercise and we shall be pleased to be consulted on this at your earliest opportunity.</p>	
CS10/174	Peter and Irene Sargeant	<p>Omission</p> <p>I should like to see the 'Infrastructure' paper, when available. However, I fear the the pre-existence of the 'Green Infrastructure' paper is going to cause confusion.</p> <p>I take the opportunity to confirm that, whatever the intended import of the penultimate paragraph of your (rather anonymous) letter dated 16th January - which can be read as requiring re-registration - I should like to be kept informed of future stages of the process.</p> <p>The balance between the Core Strategy document and issues identified (one might say, hidden) in topic area papers, upon which i comment individually below, is mistaken. This is partly because the summaries of RSS are very general, on one hand, and very specific to Warrington, on the other: see typical paragraphs 5.11-5.12, in area papers.</p> <p>Overall, the discussion is introverted and pays insufficient attention to major projects such as the second Mersey crossing and the permissive identification of Newton-le-Willows, in the new RSS, as a location for strategic rail freight interchange, which you acknowledge could be party in Warrington and (having swallowed the propaganda, it seems) generate 10,000 jobs.</p> <p>Such extraneous factors must have bearing on travel patterns, road traffic patterns, road traffic congestion, the evolution of public transport, (competing) economic development sites within Warrington itself, climate change and the decision-making process for problem sites like Peel Hall.</p> <p>You say there would be no change to Greenbelt boundaries, including in the Winwick sector; however you actually describe Parkside as being a Green Belt site, without any reconciliation - for example at 4.4 and, still more obviously, at 7.1 of the North & West Warrington paper. (Both references also incorrectly imply that the current application curtilage is derived direct from RSS, which makes one wonder if the Council is about to fall over its own left foot)</p>	<p>The Infrastructure Capacity Assessment will be released for consultation in due course. The document addresses all types of infrastructure, including green infrastructure and is intended to document existing infrastructure within Warrington. The Green Infrastructure Paper that has already been the subject of consultation is intended to be a "living document" that is updated as the Core Strategy and policy approach to green infrastructure develops.</p> <p>Comments regarding cross boundary issues and impacts is noted. These issues will be addressed as a priority in the next stage of Core Strategy development.</p> <p>In compliance with the Regional Spatial Strategy there will be no strategic changes to Green Belt boundaries proposed within the Core Strategy. There may, however, where justified by exception circumstances be proposals for more localised Green Belt boundary changes.</p>

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		<p>In regard to Peel Hall, it rather looks as though attribution to Poulton North (Warrington East) is a mistake, which distorts the picture further.</p> <p>It appears, in fact, to be in Warrington Central (perhaps in Poplars & Hulme Ward), from 7.1 of that paper. It is also clearly relevant to Warrington North & West. Indeed, the true position is amply illustrated by the diagram at Figure 6.1. However, a symbol for Parkside could be a helpful addition!</p>	<p>Comments regarding Peel Hall and Figure 6.1 are noted. Figure 6.1 will be amended accordingly.</p>
CSIO/179	Peter and Irene Sargeant	<p>Having some relevant professional background, i am better placed than some to understand and make informed guesses about the meanings of acronyms such as 'CWEA' (Employment, 6.2), 'IPCC' AND 'UNKCIP' (Climate Change, 6.1). I may also be a harsh critic. Even so, i feel for others.</p> <p>It is only by reading the main document that you discover the existence of background or topic papers (both terms are used). However, there is no list, as such. Even in the topic papers, themselves, one has to look for an order in paragraphs 1.5 and 1.8. Whether the bundle your kindly supplied to me came in that sequence, i cannot remember. However, it should be no surprise if people comment at random.</p> <p>The fact that you have common elements in the background papers can be a little confusing, as there are some parts which show (needless) variation on the common format or are subject to change according to topic. One then has to spot the substantive differences.</p> <p>There are a number of stylistic and language issues, down to an including (lack of and inconsistent) use of punctuation marks. Some are marginal irritations; others get in the way of understanding. As indicated, various acronyms are used without explanation; other mentions only make proper sense if you already know what the 'Nottingham Declaration' says or what a 'Local Area Agreement' is (Climate Change, 2.4).</p> <p>Warrington still has difficulty in differentiating between borough and town (including town centre); added to this, the five 'neighbourhoods' are not really single neighbourhoods, as most people would understand them. It would be better to treat them as planning (and management) areas, which are collections of wards.</p> <p>The process of differentiation itself gives rise to the risk of confusion. For one thing, which is correct: 'North & West' (title), 'North West' (Map 1.1), 'North and West' (1.9), 'North-West', 'north-west' or 'north west' (2.7-2.8, for example)? For another, there is no map of wards, as such! In similar vein, 'Culcheth and Croft' is also 'Culcheth & Croft'.</p>	<p>Comments noted. A full glossary will be provided for future documents and the use of acronyms and jargon will be avoided where these cannot be fully explained.</p> <p>Future documents will aim to be consistent in all aspects, including grammar.</p> <p>Comments regarding the aspirational nature of the vision are noted. It is imperative that the Core Strategy is realistic and deliverable.</p> <p>Comments regarding the difficulty of collecting and aligning collective aspirations of an area are noted. Public consultation and stakeholder engagement will ensure, as fully as possible and practical that all identified aspirations are reflected in the document.</p>

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		<p>Further, there needs to be greater recognition that, issues of definition and naming part, dividing the borough up may cause items to get lost in the cracks: Peel Hall is a good case in point, as - regardless of attribution to Poulton North - it clearly has a bearing on the neighbouring area to the north.</p> <p>Terms such as 'New Town' (found both with lower case <i>and</i> inverted commas at 5.30 in the Central Warrington paper) would be much better with capitals; and the mixed usages found for expressions such as Highways Agency, Council, Borough, Town Centre and Green Belt suggests there is schizophrenia in New Town House.</p> <p>My rule of thumb is that if capitals assist clarity, it is better to use them. Calling Jacqui Smith home secretary does nothing for her dignity or ease of reading. There may be some room for debate, in context, about 'Devil' versus 'devil'; there is none when it comes to 'Highways Agency'. Perversely, however, I have also found 'Carbon Dioxide' (Transport 2.1), where i would have expected 'carbon dioxide' - for Carbon is not yet God.</p> <p>Similar considerations arise with respect to hyphens, whose omission frequently obstructs comprehension and spee of reading. Consistency is kind. Equally, the American yen for running words together, seemingly borrowed from German, helps nobody. Thank you for resisting it.</p> <p>However, please note that, contrary to 7.5 of the Transport paper, applications are 'called in' (no hyphen). Of course, those which have already been called in may be described, albeit rather inelegantly as 'called-in applications'. As with commas, hyphens should not be scattered like confetti in the hope that they will fall in the right place: they should be used with understanding and discretion.</p> <p>I have found horrors such as 'Borough objective' (Waste, 9.1), along with the alternative possessive 'Boroughs' (Waste, 8.1), and 'residential skills base' (Employment,2.1); the latter is intended to refer to the skills of residents rather than knowledge of one's area and how to use a vacuum cleaner, I think! Note-forms, such as 'Jan 2009' (Transport, 3.3), should also be regarded as simply unacceptable.</p> <p>All of which leads me to various assertions about the differences between the most recent 'old-style development plans' and LDFs.</p> <p>I dispute what you say about the supposed faults, at 1.2 of the background papers. The new system shows every sign of being still more complicated, wordy and ridden by jargon. It is also grossly opinionated and shows every sign of creating a gulf between the aspirational world it describes, what can realistically be achieved and the actual world, pot-holes and all, that we daily experience in this shamefully filthy country.</p>	

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		<p>Bad habits are so ingrained that, rather than the young, it is now those of increasingly advanced years who are at the root of the decline in manners. Whilst new schools and health facilities are going up, the cost is being deferred and the immediate loss is quite often buildings important to past 'shaping of place'; at the same time, maintenance of virtually everything else seems to be going backwards.</p> <p>Even by 2030, Warrington cannot be, or expect to become, paradise-on-earth. Portrait and vision appear destined to become mirage and dissolve into empty words on the page. And, ironically enough, attempts to summarise the Borough Portrait comments are mixed: the Green Infrastructure paper is particularly bad, in this regard.</p> <p>There is an interesting contrast between the alleged fault of 'policies that could relate to anywhere' and the outcome of the new partnership in 'place-shaping' (hyphen added). At 1.4 you actually feel it necessary to refer to local 'distinctiveness', as if it is at risk - perhaps, advisedly so. In fact, the superseded system, properly applied, gave ample recognition to local distinctiveness. After all, under any regime, it is those who live by the 'street scene' and envy of their neighbours who show a deadened mentality.</p> <p>The suggestion that there will be less, rather than too much, policy is also rather belied by the growth of both national and regional prescriptions, on one hand, and the proliferation of SPDs, on the other-though you barely mention them. Not forgetting the other DPD LDDs, of course!</p> <p>What puzzles me - and this is where the pomposity enters in - is who is going to establish and evaluate the 'aspirations' of different areas. Indeed, how does one verify the collective aspirations of an area, in a simple, reliable and meaningful way?</p> <p>Is it going to be the Council, in a rough and ready way (as used to be the case), or an unholy alliance with other public agencies (generally based outside) and the private sector (the larger the financial clout, the more likely to be based outside), with such representatives of the local community as they see fit to include?</p>	<p>Comments noted. Some of these issues can be addressed through the Core Strategy. Consultation and engagement through this process will hopefully raise awareness of these issues within communities.</p>
CSIO/212	John Mulhall	<ul style="list-style-type: none"> • We need key recycling centres; that's why we missed EU recycling targets, ie by derogating time again. • We should be encouraging companies to use recycled products such as plastics etc thus creating jobs in the North West and reducing CO2 emissions through reducing shipping to and from Eastern Countries. We need government incentives then we start to success. • New waste processing plants must be away from built up housing areas and adjacent to motorways or dual carriageways. 	<p>Comments noted. Some of these issues can be addressed through the Core Strategy. Consultation and engagement through this process will hopefully raise awareness of these issues within communities.</p>

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		<ul style="list-style-type: none"> • The main thing i am trying to emphasise is the lack of education of the public at large • The numbyism attitude of some communities has to be addressed. • Local Authorities should be very careful how they negotiate waste contracts with land fill operators as punitive charges can arise. <p>Can this consultation act as an education working tool when it comes to best practices in place? For example:</p> <ul style="list-style-type: none"> • Recycling and separating of co-mingled waste Warrington is starting a programme with a second bin for some types of waste for recycling but have missed the point of separation within the household • Anaerobic digestion • Separate food collections • The use of land fill trading allowances/schemes • Last resort incineration as to land filling • How much compost can the economy sustain and quality of compost needs assessing. • We also need to consider separate collections for putrid waste collection (household food and pet waste) and possible clinical and surgical waste from households. • To avoid punitive charges and potential conflicts of interest Local Authorities should be encouraged to privatisate the whole of the waste management and disposal system. 	<p>Other matters relate to Waste Management and are outside of the scope of the Core Strategy.</p>
CSIO/213	John Mulhall	<ul style="list-style-type: none"> • Housing - flooding - insurance, new housing on the flood planes, people cannot get house and content insurance, or cannot afford high rates of insurance, they will not be able to even insure their personal possessions, thus are not protected against other problems like burglary, what is the gov't going to do about this? • In terms of affordability, nobody has defined what affordability is, this means in terms of pounds. Warrington has already built more than double its housing quota and what do the government partners propose for the future in Warrington • In terms of housing sooner or later the greenbelt areas in the North West will need to be encroached on as we are running out of brown sites, so why don't we start the debate now. 	<p>The approach of the Core Strategy will follow Government guidance set out in Planning Policy Statement 25 which deals with flood risk. This will ensure that future development is directed away from high risk areas and where development does take place in areas at risk, development is resilient to flooding.</p> <p>In terms of affordability, the Strategic Housing Market Assessment defines what is considered to be affordable in the Warrington context.</p> <p>The policy for housing provision at a Regional context is set out in the Regional Spatial Strategy which states</p>

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			<p>that the annual average figures set out are not absolute targets and may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies. This has been the policy approach in Warrington since the Managing the Housing Supply SPD was introduced in 2007 and will therefore continue to be the approach for the foreseeable future.</p> <p>The Strategic Housing Land Availability Assessment will provide evidence as to whether the town is running out of brownfield sites and whether future housing provision can be accommodated within the current built areas of Warrington.</p>
CSIO/223	Eng Klaus Armstrong-Braun	Flintshire county council forward planning department are extremely impressed with this document and say it is a model for all councils to use.	Comment noted.
CSIO/214	Mr John Holmes Holmes Antil Chartered Town Planners	We would draw your attention to Policy RT8 in the North West of England Plan which specifically identifies a broad location for an 'Intermodal Freight Terminal' at 'Newton-le-Willows (with access to the West Coast Main Line and Chat Moss rail route)'.	<p>Comments noted. Future documents will reflect the importance of RSS Policy RT8 and the significance of proposals at Parkside for the Borough.</p> <p>In order for this 'broad location' to be deliverable, land within Warrington Borough is required, not least for a related J22 of M6.</p> <p>The emerging Core Strategy of St Helens Council's LDF highlights the requirement for the development of the SRFI to straddle the boundaries of the two local authorities. The planning application submitted to the two Councils in 2006 explains how the road and rail accesses interrelate with the development itself. As you know, extensive consultation has taken place in connection with the application, involving statutory consultees, other groups and bodies and the general public. Exhibitions were held at Winwick, for example.</p>

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		<p>St Helens Council is about to reach its Submission Draft Stage of the Core Strategy which we believe is likely to endorse the Parkside proposal.</p> <p>I understand that liaison between the Authorities has been taking place, but it is important for the two Core Strategies to be properly co-ordinated and aligned with regard to the implementation of RSS Policy RT8.</p> <p>I should be grateful therefore if you could advise us how you intend to progress this particular matter. We are of course willing to meet to discuss the relevant issues.</p>	<p>outcome of the planning application process in considering how best to include an appropriate policy framework.</p>
CSIO/38	Phil Lally Government Office for the North West	<p>1. One of the problems in responding to the report is that the issues, vision, objectives and strategic options are not sufficiently developed at this stage to enable meaningful comments to be made. We commented on these matters when responding to a draft of the Issues and Options Report and unfortunately the problems we identified at that stage have not been addressed to any great extent.</p> <p>2. As we indicated previously, the spatial portrait needs to be seen as the starting point in terms of identifying issues as it provides the essential place based dimension and gets away from the traditional theme based approach that largely characterised the 'old', more land use based, planning system. What are the places making up the borough, what are their characteristics and what are the key issues affecting them? There are a number of area based background papers but it is difficult to see how the issues they raise have influenced the identification of key issues, vision, objectives and options in the main document. We also indicated that the spatial portrait should place the borough within a wider sub-regional context which identifies the sub-regional policy context and key cross boundary issues as it is essential that the Core Strategy is developed in harmony with the emerging strategies of neighbouring authorities.</p>	<p>Comments noted. The "Next Steps" section sets out that the options will be further developed and consulted on before progression to the preferred option.</p> <p>The links and flow from the spatial portrait, key issues, vision, objectives and options will be made clearer in future documents. A summary of the spatial portrait will be included in future documents focused on the sites and areas identified in the original report.</p> <p>Placing the borough within the wider sub-regional context and identifying cross boundary issues is a priority in progressing Core Strategy production.</p>
CSIO/180	Stephen Brown Environment Agency	<p>The Environment Agency would support any policies which aim to appropriately bring derelict or Brownfield land back into beneficial use.</p> <p>Reference is made to tidal flooding and the effects of climate change in Central Warrington. This should be expanded to include other tidal and flood risk areas in the Borough.</p>	<p>Support for policies which aim to appropriately bring derelict or brownfield land back into beneficial use noted.</p> <p>It is accepted that other tidal and flood risk areas in the Borough not just Central Warrington should be identified as being</p>

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		<p>Issues around waste management for Warrington could potentially be influenced by the Joint Merseyside Waste Development Plan Document and Greater Manchester Joint Waste DPD which are both currently being prepared by the Merseyside and Greater Manchester Authorities. The move towards waste minimisation, re-use, recycling and diversion from landfill may reduce the imports of waste to the landfills within Warrington. There is limited potential for future landfill within the region.</p> <p>The Regional Spatial Strategy (RSS) has a policy EM5 (Integrated Water Management) which mentions delivery of River Basin Management Plans. More emphasis needs to be given to rivers (and their quality). The Environment Agency considers that the Water Framework Directive (WFD) should be identified as a key issue.</p> <p>The WFD (2000/60/EC) is a wide-ranging and ambitious piece of European Environmental Legislation. Its overall objectives is to bring about the effective co-ordination of water environment policy and regulations across Europe. The aspiration is that it will give people a clean, healthy environment fit for the 21st Century and an environment they can take pride in and enjoy to the full. The vision is for all surface water bodies to achieve 'good ecological status' or 'good ecological potential' by 2027.</p> <p>The WFD will have implications for spatial planning and development decisions in Warrington. Development can contribute to an improved water environment but can also have an adverse impact. Spatial planning bodies can help deliver the WFD objectives by adopting policies that contribute to, or support, measures put in place to achieve 'good ecological status'. For example, new housing developments could be assessed against:</p> <ul style="list-style-type: none"> ● Available water resources ● Existing capacity for sewerage treatment ● The potential environmental impacts discharges of treated effluent might have on receiving water bodies 	<p>Issues around waste management for Warrington could potentially be influenced by the Joint Merseyside Waste Development Plan Document and Greater Manchester Joint Waste DPD which are both currently being prepared by the Merseyside and Greater Manchester Authorities. The move towards waste minimisation, re-use, recycling and diversion from landfill may reduce the imports of waste to the landfills within Warrington. There is limited potential for future landfill within the region.</p> <p>Regard will be had to the Joint Merseyside Waste Development Plan Documents and the Greater Manchester Joint Waste DPD in addressing cross boundary issues for waste.</p> <p>Comments regarding the Water Framework Directive and the River Basin Management Plan are noted. Water quality is acknowledged as an important consideration and should be recognised as part of the key issues. Future documents will be amended to reflect this.</p>

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		<p>The adoption of a River Basin Management Plan will cover the whole water environment in the North West area, which included Warrington. The Plan will establish new and better ways of protecting and improving the water environment. It is ambitious, wide-ranging and challenges us to take a more holistic approach to the way we manage our waters. It sets the bar higher than ever before in terms of environmental quality. It is an opportunity for individuals and organisations to work together to improve the quality of every aspect of the water environment.</p> <p>Urban and rural waters that achieve good status will allow a full range of uses including clean water for drinking and bathing, recreational opportunities for communities and have economic benefits. There will be sustainable amounts of water in rivers, groundwaters and wetlands, and diverse habitats for wildlife in and around those places. There will be an improved and protected natural landscape that will help us to promote the value of recreation and contact with the natural world.</p>	<p>The Regional Spatial Strategy sets out an over provision of employment land in Cheshire and Warrington. Any Core Strategy strategic employment land allocations would have to be brought forward and justified in that context.</p> <p>Existing allocations include the extensive Omega site which is identified as a Strategic Investment Site in the RSS</p> <p>An appropriate level of employment land will be explored as part of Core Strategy development, options refinement and testing.</p>
CSIO/211	John Mulhall	<p>Provision should be made for a 40-80 hectare (100 - 200 acre) site for medium and heavy industry to either locate, relocate, nationally or internationally to the Mersey Belt Corridor. Such a facility is required provided it's next to the motorway and dual carriageway infrastructures.</p> <p>Warrington's current policy as we don't have such a site (or provision of such) is to grant planning permissions on brownfield sites that are in built up areas, especially in areas that suffer ill health and many forms of deprivation. Furthermore the current provision in Warrington is of 320 hectares that is identified in UDP policies EMP1 and EMP3 consists of small parcels of land scattered across the Town that should only be used for housing or warehousing - such a site would also benefit planners and the SoS and would avoid the controversial and costly planning applications and Public Inquiries. Such a facility, be it on greenfield or brownfield land or a mixture of both, the site could be carried out by a CPO in line with the Environment Agency IPPC strict policy guidelines</p>	
CSIO/60	Mr David Hardman Asset Protection United Utilities	<p>Thanks to the environmental improvements brought about by pressure from the Environment Agency and investment by United Utilities over the last 20 years the Warrington Waterfront project is now an attractive proposition now that the River Mersey is much improved in its water quality.</p>	Comments noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/77	Miss Rachael A. Bust Deputy Head Planning and Local Authority Liaison Department The Coal Authority	<p>Coal Mining Legacy</p> <p>As you will be aware, the North-West has been subjected to coal mining which will have left a legacy, both in areas directly mined and also in surrounding areas, for example mine water run-off can often occur at some distance to where the mining activity actually occurred. Whilst most past mining is generally benign in nature potential public safety and stability problems can be triggered and uncovered by development activities.</p> <p>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 where coal exists near to the surface, including existing residential areas. The new Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.</p> <p>Within Warrington, The Coal Authority records identify that some coal mining related hazards are likely to be present in the area of coal resource and beyond further into the plan area.</p> <p>The Coal Authority has records of over 178,000 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. It is estimated that as many as 2 million properties 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 needs to take account of the coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.</p> <p>Although mining legacy is a minerals related development it is important that new development delivered through the Local Development Framework, recognises the problems and how they can be positively addressed. Land instability and mining legacy is not a complete constraint on the new development, rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p> <p>The changes which The Coal Authority would like to see in relation to mining legacy issues are:</p> <p>Section 11 Development Management Policies - Consistency with National Policy</p>	<p>Comments noted. Reference to the need to consider ground stability will be included in future development management considerations.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Comment - The Coal Authority considers that the principles of sustainable development set out in paragraph 11.5 should include reference to the need to consider issues of ground stability, not only in relation to mining legacy but in wider terms, as part of the overall approach to development management.</p> <p>Reason - To comply with the guidance and advice set out in PPG14, particularly in relation to paragraphs 26 and 27 which set out the need for both strategic and local policies in the development plan on this topic.</p> <p>The Coal Authority welcomes the opportunity to make these early comments; we are of course willing to discuss the comments made above in further detail if desired. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.</p>	<p>General comments noted. Issues raised will be addressed in future documents and in the Infrastructure work that is being undertaken to support the Core Strategy.</p> <p>Regarding the evidence base - an open space assessment has been published and work is ongoing on Green Infrastructure evidence collection and assessment.</p> <p>Comments regarding the protection and management of sport facilities are noted.</p> <p>Regard will be had to the Planning Policy Objectives set out.</p> <p>Comments regarding design are noted.</p> <p>Contributions for sport and recreation already form part of the Council's approach through the Supplementary Planning Document adopted in 2007.</p>
CSIO/210	Stephen Hughes Sport England	<p>In addition to the above specific comments, we offer some more general pointers to the development of a sound approach to planning for sport and recreation as the Core Strategy evolves. In essence, the Core Strategy Preferred Options should include policy-related considerations of:</p> <ul style="list-style-type: none"> • open space provision and protection; • facility provision; • access for all/equality of access; • quality of provision; • the needs of specific sports and user groups; and • opportunities for countryside recreation. <p>The Core Strategy will be a spatial plan and as such needs to clearly demonstrate how land use is connected with wider policy considerations concerning the development of sustainable communities. Sport and active recreation can make an important contribution to this relationship through:</p> <ul style="list-style-type: none"> • Identifying opportunities for delivering an enhanced quality of life for communities, in the short, medium and longer term; • Recognising and taking full advantage of the unique ability of sport and active recreation to contribute to a wide array of policy and community aspirations; 	

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		<ul style="list-style-type: none"> • The development of partnership working stimulated by, and perhaps centred on, sport and active recreation as a common interest; • Using sport and recreation as one of the building blocks of planning and delivery of sustainable communities. <p>The Evidence Base</p> <p>A fundamental pre-requisite to decision-making is a sound evidence base on patterns of usage and value to the local community. A PPG17-compliant assessment of open space, sport and recreation facilities, in particular playing fields should address this issue. The PPS12 Companion Guide (p.34) states that: 'Comprehensive survey and monitoring information will be needed to develop evidence bases which help authorities to identify opportunities, constraints and issues for their areas. Authorities will need to assess and build on this to ensure they have sufficient social, environmental, economic and physical information to identify the spatial characteristics of their locality'. The <u>centrepiece of this effort should be a PPG17-compliant assessment of open space and recreation facilities</u>. Reliance on NPFA standards is not an adequate means of establishing local needs, as was established in the Stafford and Lichfield Core Strategy Inquiries. For example, the ruling that Lichfield's Core Strategy was unsound was partly based on the finding that there was a lack of a credible evidence base to support the policy relating to the provision of open space in new development. Further details can be found in the Inspector's report (paragraphs 2.3 to 2.5 and 2.74-2.80 of the report are particularly relevant), which can be downloaded from: www.lichfielddc.gov.uk/downloads/Report_on_the_Examination_into_the_Core_Strategy.pdf</p> <p>The PPG17 Companion Guide offers an indicative means of undertaking this assessment, in order to guide the assessment process and help structure subsequent policy making.</p> <p>'Details included in full response'</p> <p>The protection and Management of Sport Facilities</p> <p>The following objectives and policy approach summarise Sport England's aspirations for the protection and management of sport and recreation resources and their provision within new development. These may help in developing policies for the emerging Core Strategy specifying the infrastructure required or improved as part of new development scenarios.</p> <p>'Details included in full response'</p>	Content and procedure checklist noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Opportunities for Countryside Recreation</p> <p>The following policy objectives and approaches should assist the Council in developing policies for these resources:</p> <p>Planning Policy Objective 13: To support and promote the use of natural resources for sport in a way which meets sustainable development objectives. Sport England considers that development proposals for sport should be based on the 'Best Available Place' principle. This involves a planned approach to the provision and protection of sites and facilities, including the assessment of the impact of any sports use and a commitment to appropriate management measures.</p> <p>Planning Policy Objective 14: Where management solutions have been tried and shown not to work due to irreconcilable conflict, then alternative locations should be found to accommodate the displaced sports activities, to a similar or improved standard.</p> <p>Planning Policy Objective 10: To promote the urban fringe as an important resource in providing opportunities for sport, and support proposals for improved access for sport, for the development of extensive facilities such as golf courses and pitches, and for built facilities which can be developed in a way which meets sustainable development objectives and which helps to maintain and improve the identity of this resource.</p> <p>Design</p> <p>In preparing policy for development areas, reference to Sport England's guidance on creating environments which encourage physical activity could be of particular assistance in preparing detailed proposals. Taking widely accepted principles of good design (character, continuity, quality, legibility etc) as a starting point, the guidance uses three objectives to frame advice on positive design: improving accessibility; enhancing amenity; and increasing awareness. Using the three design objectives, the guidance explores in detail their application to three activity settings:</p> <ul style="list-style-type: none"> ● Everyday activity destinations (shops, homes, schools workplaces) ● Informal activity and recreation (play areas, parks & gardens) ● Formal sports and leisure activities (sports pitches, swimming pools etc) <p>Active Design poses a number of questions for consideration by planners.</p> <p>'Details included in full response'</p>	

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Planning Contributions</p> <p>Sport and recreation facility has key role to play in the creation of healthy and sustainable communities. As well as meeting sport/recreation needs of the community, facilities can contribute towards improving health and education and reducing crime and anti-social behaviour. Sport England therefore considers that when considering community infrastructure provision associated with new development, the approach taken to sport/recreation facility provision should be similar to that taken to education and health facilities. Unless existing facilities have the capacity in quantitative and qualitative terms to accommodate the additional demand generated by a development of this scale, financial contributions should be secured towards the provision or enhancement of sports facilities both on and off -site, in line with policy on planning obligations developed for the area. The financial contributions needed to meet the sport/recreation needs of a development of this scale should be incorporated into the financial appraisal of the development proposals. Sport England has developed detailed guidance on these matters, and is available at: www.sportengland.org/get resources>planning for sport>planning contributions</p> <p>A Checklist of Content and Procedure</p> <p>As a summary of the proceeding points is included in the full response document.</p>	<p>Support for Option 3 noted in the context of the suggested alternative development option.</p>
CS10/173	Louise Morrissey Peel Holdings	<p>4. Summary</p> <p>4.1 Peel supports Warrington Council's vision for the future development of Warrington and, subject to the alteration to the key diagram suggested at Appendix 1, feels that the key strategic places have been correctly identified.</p> <p>4.2 Peel is of the view that should its alternative development option not be accepted, Option 3 represents the most appropriate development strategy to pursue for the reasons outlined earlier.</p>	<p>Comments noted. It is acknowledged that Birchwood is a very important component of the forward supply of employment land in the borough that will continue to be supported.</p>
CS10/190	Lewis Evans Turley Associates	<p>The areas of Birchwood and Birchwood Park have played a significant role in the economic growth of Warrington and have been instrumental in attracting inward investment to the borough. This role can be demonstrated by the level of businesses and jobs supported and recognition given to these areas within the evidence base for the Core Strategy. This role is likely to continue as MEPC continue to invest in Birchwood Park with a long term investment by MEPC requires equally long-term policy support through the Core Strategy.</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Despite the recognised and significant role these areas have played and will continue to play and the recognition of this within the Evidence Base, the Core Strategy fails to build upon the sustained success of these areas with only passing references made. Our clear contention is that Birchwood and Birchwood Park should be identified as strategic sites as part of a Strategy which builds on historic and ongoing successes and develops a future role to support the objectives and vision which underpins the Strategy.</p> <p>As the emerging Strategy fails to do this for a number of reasons, MEPC wished to object to the Core Strategy objectives and component places and requests that it is reworded as set out above.</p> <p>I trust that you will give due regard to these representations in progressing the Core Strategy. If you wish to discuss the contents of this letter, please do not hesitate to contact me.</p>	Comments and consistency with RSS noted.
Section 2: Key Issues			
Question 1 - Have we correctly identified the Key Issues for Warrington?			
CSIO/48	Ms Samantha Turner Principal Planning Officer 4NW	Tackling Congestion has been identified as a key issue, which is in line with wider RSS policies. Acknowledgement is given to issues both inside and outside of the borough, which shows an appreciation that issues of traffic congestion transcend spatial boundaries and occur at a corridor level. Sustainable Economic Development is also identified as a key issue, again in line with RSS policies, and the need to identify appropriate locations for development, and the pressure this has upon sustainability, is acknowledged.	Comments and consistency with RSS noted.
CSIO/93	Laurie Lane CBRE First Alliance Properties	Support is given to the recognition at paragraph 2.3/2.4 of the need for new housing in particular with the Growth Point status (jointly with Halton and St Helens), which will significantly increase RSS housing targets by up to 43%. However, the current policy focus within Warrington is to deliver new housing in areas in need of regeneration. Central to selecting an appropriate strategy option must be the need to deliver the substantial housing housing targets.	Support noted. The Core Strategy will be underpinned by evidence demonstrating how housing figures will be met.
CSIO/94	Lauren Ashworth How Planning United Utilities	Affordability It is recognised that the delivery of affordable housing within the Borough is an important issue. However, given current market conditions the Council must acknowledge the issue of viability currently facing developers. The Council must therefore remain flexible and work with developers to ensure that affordable housing requirements on new housing developments (extant and future permissions) do not lead to schemes becoming unviable and therefore undeliverable.	Comments noted. An affordable housing viability assessment will fundamentally inform the Core Strategy approach to setting targets, the level of affordable housing sought on individual developments, and on what size of developments affordable housing is sought. All figures will be the basis of negotiation providing flexibility and ensuring deliverability.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/95	Lauren Ashworth How Planning United Utilities	<u>Sustaining Economic Success</u> Support is given to the Council's recognition of the need to ensure economic development is planned for in Warrington for a range of economic sectors. It is important that sufficient land is provided across the Borough.	Support noted.
CSIO/87	Dennis Smith Trafford Council	<u>Housing</u> I note that at this stage there is little information in relation to the location and phasing of residential developments. As detailed above, Trafford would encourage further engagement with regards to future developments in Culcheth and Lymm, as it may have impacts on Trafford residents and infrastructure.	Further detail regarding location and phasing of residential development will emerge through work on the Strategic Housing Land Availability Assessment being undertaken as part of the Core Strategy evidence base. The need for cross boundary co-ordination is recognised.
CSIO/88	Dennis Smith Trafford Council	<u>Sustaining Economic Success</u> Trafford Council would be particularly interested in receiving an update on your Employment Land Review and engaging with yourselves regarding employment opportunities in the north and eastern part of your Borough. This may bring benefits to residents of Trafford, particularly Partington and Carrington.	Comments noted. Cross boundary issues will be addressed as a priority in the next steps of Core Strategy production.
CSIO/89	Dennis Smith Trafford Council	<u>Tackling Congestion</u> The Issues and Options report would benefit from details of which roads are congested and what strategy is being developed to mitigate additional congestion by new developments. It may prove beneficial to work jointly with neighbouring authorities before engaging with bodies such as the Highways Agency to ensure a co-ordinated approach towards tackling congestion has been established. Ensure that any additional trip generation is taken into consideration in the Greater Manchester transport modelling work or specifically the Trafford/Salford joint modelling work.	Comments noted. Details of current congestion and planned mitigation will emerge through infrastructure planning which will support development of the Core Strategy. The need to work with adjacent authorities is recognised.
CSIO/4	Mr Derek Warren	2.14 Waste: Why are there "significant" land fill sites? By whose definition? Whether this is a fact is immaterial and does not necessary mean that W must import waste.	There are a number of landfill sites within Warrington, which given its size are considered to be significant. Comments regarding the importation of waste are noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/32	Mr Roger Lamming Secretary Croft Residents Action Group	<p>The vision is that Warrington will be recognised as one of the best places to live and work in the UK where everyone enjoys an outstanding quality of life. Key to this is the variety of living environments across the Borough and choices of places to live together with the ability to enjoy the countryside on the edge of the towns and around the villages. We are supportive of the view that the Green Belt should not be compromised but that this should be reinforced to state consider that existing boundaries should not be changed ie no Green Belt land lost to development. We are supportive of the view that there is a need for affordable housing but that this should be met within the strategic areas reinforcing the regeneration of the town and by re-development of sites outside of the Green Belt particularly within the villages.</p> <p>Re.2.13 Sites of Importance to Nature Conservation (SINCs) provide the opportunity to enhance the environmental assets and require ongoing protection. They contribute to the quality of life and a sense of place for both local residents and visitors</p>	<p>The strategic policy context set out in the approved Regional Spatial Strategy is that there should be no Strategic review of Green Belt boundaries before 2021. Green Belt Policy ensures that land within the Green Belt is not lost to inappropriate development. The Regional Spatial nevertheless accepts that minor localised changes to detailed boundaries may be proposed and cannot be ruled out at this stage.</p> <p>Comments regarding affordable housing and Sites of Importance to Nature Conservation are noted.</p>
CSIO/59	Mr David Hardman Asset Protection United Utilities	<p>The location of development throughout the Borough is important and attention to potential flooding issues in deciding where development should be built is very important.</p>	<p>Comments noted. Flooding issues will be fully considered when deciding where development should be built.</p>
CSIO/105	Greater Manchester Geological Unit	<p>Question 1 - Have we correctly identified the Key Issues for Warrington?</p> <p>Minerals should also be recognised as a key issue. At the very least the Core Strategy needs to address the requirements set out in National Policy (Minerals Policy Statement 1 - MPS1) which requires local planning authorities to provide a clear guide to mineral operators and the public about the locations where mineral extraction may take place, the safeguarding of sensitive environmental features and of mineral resources with potential for future extraction, and cover all aspects of environmental and resource protection including restoration.</p> <p>GMGU welcomes the inclusion of waste as a 'key issue' and the recognition that waste does not necessarily respect administrative boundaries. Cross boundary movements are identified as a key issue within the Waste Core Strategy Background Paper and the report 'Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities - Final Report October 2008' (Urban Mines) will be an important consideration in the development of the Core Strategy.</p>	<p>Comments regarding minerals are noted. A minerals study is currently being carried out as part of the emerging evidence base for the Core Strategy. The results of this study will help to identify whether Minerals should be regarded as a Key Issue for Warrington. The study will also provide the evidence for the Core Strategy to identify where mineral extraction may take place and whether areas should be safeguarded due to sensitive environmental features of for potential future extraction.</p> <p>Comments regarding waste are noted. Urban Mines are currently carrying out a Waste Needs Assessment for Warrington which will add to the evidence base for consideration.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/71	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning Cushman & Wakefield LLP	We agree with the issues that the Council have identified as those being most relevant in respect to Warrington. In order to achieve the aspirational vision of being "recognised as one of the best places to live and work in the UK where everybody enjoys an outstanding quality of life" issues such as Housing Growth, Economic Success, Revitalising the Town Centre, Maintenance of the Green Belt and Tackling Congestion will all need to be addressed.	Agreement noted.
CSIO/111	Satnam Millenium Ltd	The key issue for Warrington over the forthcoming plan period will be how the Growth Agenda is successfully handled for the town over the forthcoming years. The Growth Agenda should aim to bring maximum advantage to existing communities and areas, whilst resulting in the least amount of disadvantage to the town and its inhabitants. All of the other key objectives need to be set against this priority to achieve growth. Development should be allocated to provide for local improvements to the lifestyle and wellbeing of local communities within Warrington, whilst enabling the inward investment and population growth required to make Warrington a success.	Comments noted. The Growth Point status and increase in housing numbers has to be taken forward and tested through the statutory planning process. This will ensure consultation, sustainability testing and also deliverability and appropriate infrastructure provision.
CSIO/118	Mr M Durrington Culcheth and Glazebury Parish Council	In the main yes but Section 2.14 on waste should refer to local waste i.e "appropriate locations for local waste disposal"	Comments noted. Future documents will be amended to refer to local waste.
CSIO/146	Warrington & Co	The Board agrees that the right issues have been addressed.	Agreement noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/153	Mr John Brooks Director GVA Grimley for the Homes and Communities Agency	<p>The key issues identified, whilst wide ranging, are broadly correct in terms of Warrington. The development of Omega, in the amended form as proposed above, is central to the response on a number of those issues identified as follows:</p> <ul style="list-style-type: none"> • Omega would contribute to the delivery of housing growth, both open market and affordable housing, fully supporting Warrington's Growth Point status. • Omega would assist in respect of the affordability issue and the requirement for over 400 additional new affordable houses per annum. • Omega would continue to contribute to sustaining economic success; Omega would remain a major contributor towards economic development and performance in the Borough; even allowing for the widened approach to land use set out above, Omega South would deliver a significant quantum of B1 and B8 floorspace. Omega would clearly continue to be central in meeting sectoral demand and accommodating growth to the benefit of the town and the wider sub region. • The use of Omega for a wider range of uses would assist in the maintenance of the Green Belt beyond 2021. • Omega is capable of contributing to tackling inequalities through the delivery of a significant scale of employment opportunities. • The range of uses would also assist with a reduction in originally anticipated traffic movements in the vicinity of the development. 	<p>Comments noted. Comments will be taken into account as the options are assessed at the next stage of the process.</p>
CSIO/157	Sarah Jones Turley Associates	<ul style="list-style-type: none"> • We endorse 'revitalising the town centre' as a key issue for the LDF, including the recognition of the need to diversify uses within the town centre. • The identification of areas/sites around the town centre for potential investment for key town centre uses should be based upon a review of the capacity/need for such uses as is referenced. We would, however, cross reference this key issue to the Town Centre Core Strategy Background Paper in which it is unclear whether an update to the 2006 Retail and Leisure Study will be undertaken by the Borough Council to inform the LDF process (see separate representation to that Background Paper). • We would question the tone of this key issue which appears to cite the opening of the Golden Square extension as the reason for the poor performance of other parts of the town centre. There are likely to be other considerations to the performance of such areas, and any 'post opening' adjustment of the profile and function of parts of the centre is a normal process and generally temporary in nature. • There is no recognition that Golden Square has a critical role in the function and attraction of the town centre. Golden Square is a catalyst for further investment in the Centre which is not identified as an element of this key issue. Relevant considerations include that effective linkage of the shopping centre into the town centre could assist in securing the improvement and investment of a number of areas of the town centre. 	<p>Support for identification of "revitalising the town centre" as a key issue noted.</p> <p>An update to the capacity element of the 2006 retail and leisure study is currently underway with a new household survey which was undertaken earlier in 2009. This will provide more up to date evidence for the Core Strategy.</p> <p>Comments regarding Golden Square are noted. The role of Golden Square in the Town Centre will be reflected in future documents.</p> <p>Design and townscape will be recognised as a key issue in future documents.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/196	Mrs Jacqueline Johnson Cheshire Branch CPRE	<p>The importance of urban design and townscape/streetscape is not recognised as a key issue. This could be included within an expanded key issue 'Safeguarding and Enhancing Environmental and Townscape Assets'</p> <p>Question 1 - Have we correctly identified the key issues for Warrington?</p> <p>Not all of them- there is nothing about protecting farmland and the importance of locally grown food both now and in the future. There is also an overarching key issue with respect to delivering desirable outcomes within the restrictions of the present infrastructure. This is referred to later in the document but needs including at this stage.</p>	<p>Comments noted. The issue of protecting farmland should be reflected in considering the Green Belt issue. Work is ongoing on an Infrastructure Capacity Assessment which will support the Core Strategy work and acknowledge the importance of the issue.</p>
CSIO/206	Stephen Hughes Sport England	<p>Key Issues</p> <p>Sport England considers that attention should be paid to sport recreation as part of a good quality of life in the Borough. This would accord with the proposed vision and objectives of the Core Strategy, and more accurately reflect the need to help deliver the aspirations of the Sustainable Community Strategy. This is important for the justification and development of the vision and the objectives later on.</p>	<p>Comments noted.</p>
CSIO/215	Eng Klaus Armstrong-Braun	<ul style="list-style-type: none"> • Maintain and enhance biodiversity • Ensuring a high protection of the natural environment • Ensuring a high protection of the cultural heritage • Policies/Issues of the young - how to engage them and see what they want in the LDF. • Use schools, youth clubs, youth councils, school councils or youth gathering places. They will be that future implementers of the plan or ignore it. • Environmental issues missed out of policy: Sustainable development balancing community's need with those of wild life • Ascertaining where human activities can take place which does not impact on EU sensitive protected species. • Connecting communities through the planning system • Increase Blue corridors and green corridors for wildlife (blue=water) • Rural transport - use of "merry-go-round" Taxis where the passengers pay a bus price for journeys. • Tapping into diversity of local skills or hidden skills to make use of in what ever area the skills can be put to good use skills by new enterprises. • Focus on SME's and start up businesses 	<p>Comments on natural environment, biodiversity, green infrastructure, landscape and sustainability noted.</p> <p>Comments on culture, engaging young people, connecting communities and diversity of local skills and empty homes noted.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<ul style="list-style-type: none"> • Fragmentation of habitat in increasing built developments • Enhance the countryside landscape where degraded (EU Habitats Directive Part 2) • Extension of Agriculture in urban areas • Increase tree planting in urban areas 'Shade' CO2 absorbed and help biodiversity • Empty homes private and Council - Use the empty homes Act introduced in 2009 to ensure reuse of empty and derelict houses. The Council should have a vision of a "Sustainable Economy" and not economic Growth. 	
CSIO/13	Laurie Lane CBRE for client	<p>Paragraph 2.7 considers the Key Issue of 'Revitalising the Town Centre'. It states, 'The fringes of the town centre are also in need of investment and there are key sites at the doorstep of the town centre that do not enhance the image, appearance or economy of the borough'.</p> <p>We support this identified key issue. The site at Fennel Street is on the periphery of the town centre and is identified within the 2008 Austin-Smith Lord Draft Town Centre Strategy (as a 'Gateway Linkage Site'). The Fennel Street site is an example of a location which could play a key role in stimulating the economy and vitality of the town centre and could also serve to improve the image and appearance of the borough through appropriate design. This would in turn encourage greater footfall with and around the town centre.</p>	<p>Support noted.</p>
CSIO/19	Laurie Lane CBRE for United Utilities	<p>Key Issues promoted include 'delivery of housing growth' which is identified as a Council priority, as well as 'sustaining economic growth' which acknowledges the link between the levels of housing growth required and economic growth in Warrington.</p> <p>We support the Key Issues identified for the Warrington Core Strategy, including the identified need for new housing in Warrington and the identified need for housing growth to support economic development.</p>	<p>Support noted.</p>
CSIO/24	Alan Hubbard National Trust	<p>Para 2.3 - The overall approach as set out in the third sentence of this paragraph is appropriate, demonstrates an integrated approach to sustainable development in accordance with PPS1, and is supported accordingly.</p> <p>Para 2.6 - It is considered that the approach set out here to employment land needs to mirror that proposed for housing land, therefore the third sentence should be amended to read "if additional land for employment development is needed, appropriate locations will have to be identified without compromising the Green Belt or posing a threat to environmental assets".</p>	<p>Support and comments regarding employment provision, reducing emissions and adaptation measures are noted. Future documents will be amended to reflect these comments.</p> <p>Comments regarding heritage resources are noted. Future documents will be amended to reflect this.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Para 2.11 - Whilst the overall transportation issue is set out here it does need to be assessed in the context of the need to reduce emissions from a climate change perspective and the steers provided by RSS and national policy in PPG13 - in particular measures to reduce the need to travel, shorten journeys, and enable an increased proportion of necessary journeys to be by public transport, cycle or on foot, need to be pursued.</p> <p>Para 2.12 - This generally summarises the current issues well, but attention is drawn to the role of the spatial distribution of development in reducing emissions associated with transportation, and the specific need to promote adaptation measures that will facilitate the migration of species (flora and fauna) in response to a changing climate.</p> <p>Para 2.13 - No specific consideration is given to the issues relating to how heritage resources, including archaeology, and landscape character will be protected/enhanced and how valued characteristics and distinctiveness will be safeguarded/reinforced. It is important that 'sense of place' is identified and reinforced.</p>	The need for flexibility within employment / economic policy is noted.
CSIO/69	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning Cushman & Wakefield LLP	2.6 Sustaining Economic Success: In order to address issues of economic stability, future policy documents need to retain a suitable degree of flexibility in order to adapt to fluctuating economic climates. Flexibility within employment/economic policy will allow the authority to marry opportunity and need, linking areas of economic opportunity with those areas of the greatest economic, social and physical regeneration. By seeking to link opportunity and need Warrington will be able to react quickly to growth in the economy and attract investment to the town centre and its fringe areas.	Comments noted. Future documents will look to align the identification of key issues with a more spatial approach. The scale and distribution of development will begin to emerge as options become more refined. This will inform infrastructure requirements.
CSIO/39	Phil Lally Government Office for the North West	We pointed out previously that the Key Issues section sets out a rather brief and not particularly spatial description of the issues. This is still the case. It is difficult to get any impression for the scale and distribution of development that could take place over the period covered by the Core Strategy and what the infrastructure requirements of this will be.	
CSIO/127	CBRE for First Alliance Properties	Chapter 2: Key Issues <ul style="list-style-type: none">• First Alliance Properties supports the Council's view that there is a need to assess the capacity for more retail floorspace, whether there is market for additional housing and what	Support noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/70	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning Cushman & Wakefield LLP	<p>the appropriate balance should be between the office provision in town centre and the periphery of the town (Paragraph 2.7).</p> <p>2.7 Revitalising the Town Centre:</p> <p>Ensuring the future health of the town centre is a fundamental initiative of PPS6 and the RSS and should be a central strand of any emerging local planning document. Areas located on the fringe of the town centre should also be considered as opportunities to enhance the image of the centre itself. These locations can accommodate a number of retail and leisure provisions that will not detract from the vitality and viability of the centre where they are well connected to the primary shopping areas.</p> <p>In revitalising the town centre specific reference should be taken from the emerging Masterplans that support development outside of the defined town centre and where it is envisaged that the opportunity to provide a diverse range of uses, contributing to the vitality and viability of Warrington exist. The role that mixed use developments could play in revitalising the town centre should be acknowledged.</p> <p>There is also a notable gap in the evidence base as the Retail Capacity Study dates from 2006. Since its production there have been significant alterations in the retail provision of the town centre which poses significant questions in regards the capacity for future retail and leisure additions.</p>	<p>Comments noted. The potential value of edge of centre sites for mixed use development is acknowledged, subject to the town centre first approach, relevant assessments of need and of sequentially preferable sites.</p> <p>The 2006 retail and leisure study is currently being revised using an up to date household survey. The updated capacity assessment will inform the need to make any future allocations and the policy approach.</p>
CSIO/80	Jasmine So Planner CBRE for First Alliance Properties	<p>First Alliance Properties supports the Council's view that there is a need to assess the capacity for more retail floorspace, whether there is market for additional housing and what the appropriate balance should be between the office provision in town centre and the periphery of the town (Paragraph 2.7).</p>	<p>Support noted.</p>
CSIO/254	Mr Simon Artiss Bellway Homes	<p>Para 2.5 - the SHMA has identified the need for over 400 new affordable homes each year in the Borough which in itself exceeds the minimum RSS target. We therefore support the Growth Point strategy as it is clear that there is a need for significant new homes. Only through the delivery of significant new homes (open market) will affordable needs to met to any significant extent;</p> <p>Para 2.6 - new homes serve an important role in sustaining economic growth, as recognised in the Regional Economic Strategy;</p>	<p>An update to the Strategy Housing Market Assessment has been undertaken to take into account the current economic climate. This identifies a lower need than that in the original SHMA. An affordable housing viability assessment will be carried out to inform the setting of a realistic and viable target for affordable housing in private housing</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		Para.2.8 - RSS allows insignificant or non-strategic changes to the green belt boundary in the period to 2021;	<p>development in the Core Strategy. Other means of delivering affordable housing are also being examined.</p> <p>Comments regarding the role of housing in sustaining economic growth and the green belt boundary are noted.</p>
CSIO/244	Phil Lally Government Office for the North West	<p>The question of affordable housing is dealt with briefly. It is said that the SHMA suggests that an additional 400 affordable homes need to be provided each year, which is higher than the RSS annual dwelling requirement. PPS3 says that there is a need to set an overall target for the amount of affordable housing to be provided and that the target should reflect the definition of affordable housing set out in Appendix B. This makes clear that affordable housing includes social rented and intermediate housing provided to specified eligible households whose needs are not met by the market. The recent Blyth Valley judgement emphasised the need to take account of advice in PPS3 in respect of affordable housing as the document progresses. In particular, paragraph 29 advises that plan wide-targets for affordable housing should reflect an assessment of the likely economic viability of land for housing within the area. We have previously circulated an advice note from CLG on this issue.</p>	<p>Comments noted. An update to the Strategic Housing Market Assessment has been produced to reflect changes in the current economic climate. This update has calculated a lower number of affordable homes that need to be provided each year.</p> <p>An affordable housing viability assessment is also being commissioned to provide evidence to allow a realistic and viable affordable housing target to be included within the Core Strategy.</p>
CSIO/245	Phil Lally Government Office for the North West		

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/246	Phil Lally Government Office for the North West	<p>To what extent do you have an evidence based understanding of the local feasibility and potential for renewable and low-carbon technologies, including microgeneration, to supply new development in the Borough? The PPS1 Climate Change Supplement (paragraph 26) indicates that, drawing on this evidence-base, the LPA should:</p> <ul style="list-style-type: none"> I. set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable. The target should avoid prescription on technologies and be flexible in how carbon savings from low energy supplies are to be secured; II. where there are particular and demonstrable opportunities for greater use of decentralised or low-carbon energy than the target percentage, bring forward development area or site-specific targets to secure this potential;and, in bringing forward targets, III. set out the type and size of development to which the target will be applied; and IV. ensure there is a clear rationale for the target and it is properly tested. 	A renewable energy study is currently being carried out as part of the work on the Growth Point programme. The Growth Point authorities have joined with the Merseyside authorities to ensure a comprehensive assessment of the issues.
CSIO/247	Phil Lally Government Office for the North West	The revitalisation of Warrington Town Centre is rightly raised in the key issues section but the need for improvements of other centres is not mentioned here. The question of the health of these other centres is raised in the background papers dealing with various parts of the Borough and the need for their improvement should be addressed in the Core Strategy.	Comment noted. An updated local centre survey is currently being carried out which will provide evidence for an appropriate strategy for all centres.
CSIO/248	Phil Lally Government Office for the North West	There seems to be no mention of minerals issues in the Issues and Options report. How do you propose to deal with minerals issues in the Core Strategy?	Comment noted. This issue will be given due prominence in future documents. A Minerals Study has been commissioned. Future documents will reflect the findings of this report.
CSIO/249	Phil Lally Government Office for the North West	Health issues are not specifically addressed in the key issues section. What are the main health issues facing the borough? Also have you considered crime issues?	Comments noted. These issues will be addressed in future documents when looking at the more spatial approach and particular areas.
CSIO/232	Janet Belfield Natural England	Section 2 ~ Key Issues Broadly we concur with the content but would want to see them expanded to cover the following: <ul style="list-style-type: none">• What is the value of the natural economy to sustaining economic success? (Issue 2.6);	Comments noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
	Biodiversity exists in urban areas as well as in the countryside. Town centre development can deliver benefits for biodiversity too. (Issue 2.7) Sustainable town centre development can contribute to local landscape and townscape character, quality and distinctiveness and we would welcome inclusion of this in the issue. (Issue 2.7); Maintaining the green belt should not be an issue in its own right. It should deliver more for the borough than just preserve a green wedge. We would welcome aspirational policy for the green belt that delivers green infrastructure; conserves and enhances biodiversity and geodiversity; conserves and enhances local landscape character and quality; and conserves and enhances opportunities for people to enjoy the countryside and natural environment. Green belts should recognise the value of a well managed, accessible natural environment and green infrastructure to the health and well-being of the borough's residents. (Issue 2.8) Tackling congestion should explore the issues of public transport and the necessity to provide a sustainable transport network that gives people a real alternative to the use of the car. (Issue 2.11); We would welcome a commitment to a strategic plan of green infrastructure as a network of linked green spaces to help adapt and mitigate to the effects of climate change. (Issue 2.12); We support issue 2.13, 'safeguarding and enhancing environmental assets', although we would welcome explanation that environmental assets includes biodiversity, geodiversity, landscape character and quality, and parks and open spaces. We broadly support issues 2.14 concerning sustainable waste management.		The Strategic Housing Land Availability Assessment will evidence whether the borough has a deliverable 5, 10 and 15 year housing supply which is deliverable for both the RSS and the Growth Point figures.
CSIO/164	Louise Morrissey Peel Holdings	2.2 Peel agrees that Warrington has identified the main issues that the LDF will need to address during the plan period, subject to the following observations: 2.2.1 [2.3 - 2.4] Inclusion within the Mid Mersey Growth Point should mean that the level of housing provision within the Borough will be higher than the minimum provision currently set out in RSS. This is alluded to in [7.5] although no formal position is taken by the Council. The focus must be set on <i>deliverability</i> and responsiveness to the market. Putting in place an overly restrictive policy regime will ultimately stifle regeneration as the 'planning gain' that those few schemes to come forward are expected to deliver will result in many sites being economically non-viable.	Agreement, subject to observations noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/250	Louise Morrissey Peel Holdings	[2.5] Peel concurs that Warrington faces a significant challenge in terms of providing adequate Affordable Housing to meet the identified need in the recent Fordham Research report. Peel notes that the Government has recently announced (January 2009) that it intends to relax Treasury rules to enable Council's to engage in their own house building programmes to help deliver affordable homes. The Core Strategy must include reference to the aforementioned Council house building programme and evidence to support such a programme should be produced to set out the capacity that the Council's own land holdings might deliver. Reliance on the private sector to deliver this level of affordable housing is unrealistic, particularly when combined with the Council's insistence on RSL only affordable housing provision. The Core Strategy must make provision for a broader range of affordable housing tenure as espoused in PPS3 Housing (2008).	Comments noted. Future documents should make reference to other initiatives to deliver affordable housing that are being explored in Warrington. Whilst the Strategic Housing Market Assessment and its update give an overall target for affordable housing provision, a realistic assessment needs to be made of how much can be delivered through private sector housing developments. An affordable housing viability assessment is currently being commissioned and this will ensure that a realistic and viable affordable housing target for private sector developments is included in the Core Strategy.
CSIO/251	Louise Morrissey Peel Holdings	[2.11] reads as though roads are the only part of transport infrastructure that has the potential to affect and be affected by the different growth scenarios proposed in the CSOIR. The Core Strategy must recognise that 'transport infrastructure' refers to roads, rail and canals as all are relevant to the borough. In particular the potential role of the Manchester Ship Canal and Acton Grange (Port Warrington) in removing freight traffic from the road network must be acknowledged and developed in line with Government policy that seeks to encourage modal shift not just for private journeys but also commercial freight distribution. Policy MCR6 of adopted RSS for the North West states that plans and strategies should 'support Warrington's role as a regional transport gateway / interchange'. This is further reinforced in policies RT6 and RT8. Ignoring the potential of the Manchester Ship Canal to facilitate this modal shift is contrary to policy.	Comments noted. Future documents should reflect the important role of rail and canals in Warrington's transport infrastructure.
CSIO/252	Louise Morrissey Peel Holdings	[2.12] acknowledges that 'The extent of areas at risk from tidal flooding at the historic heart of the town means that the effects of climate change are potentially significant, particularly in central Warrington.' The present thrust of planning policy in Warrington is to concentrate development in these vulnerable areas. The Core Strategy must balance the needs for regeneration of inner Warrington with the fact that this area is the most susceptible to flooding.	Comments noted. The Strategic Flood Risk Assessment (SFRA) will provide evidence to justify the Core Strategy approach. The Stage one SFRA has already been completed. A stage two SFRA is currently being commissioned. This will look at actual risk of potential development sites to flooding.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/253	Louise Morrissey Peel Holdings	[2.14] correctly identified the significance of extant landfill sites within the Borough, and the fact that Warrington currently receives waste from other Boroughs which reflects the significance and importance to the region of Warrington's landfill capacity. During the period of the Core Strategy the Council should ensure that available landfill capacity at existing facilities, such as Arpley Landfill Site is fully utilised. The recent report produced for 4NW, 'Nationally, Regionally and Sub-Regionally Significant Waste Management facilities' (October 2008) recommends that 'sub-regional planning authorities extend the timescale over which landfill sites operate in order to use all of their available potential capacity that is allowed for in existing planning permissions, in order to minimise the need to develop new alternative landfill sites'. The Core Strategy must therefore contain appropriate policies and/or allocations to ensure that the regionally important landfill capacity at Arpley is identified and its utilisation supported.	Comments noted. A Waste Needs Assessment has been commissioned to provide evidence which will support the Core Strategy approach to provision of waste facilities, alongside infrastructure planning.
CSIO/50	Ms Samantha Turner Principal Planning Officer 4NW	An emphasis is placed on reducing CO2 emissions, an area which can obviously be addressed through transport. In addition, the need to connect people with employment and other services is identified, as is the need for sustainable travel and adequate interchange between these modes of travel. These policies are all in line with RSS objectives.	Comments and consistency with RSS noted.
CSIO/25	Alan Hubbard National Trust	SECTION THREE - Sustainable Community Strategy It is not clear that the overall stance here presents an integrated approach to the achievement of sustainable development. In particular key strands as set out in PPS1 and the UK Sustainable Development Strategy are missing; specifically: <ul style="list-style-type: none"> • the protection and enhancement of the Borough's heritage • protection and reinforcement of landscape character • the prudent use of natural resources 	Comments noted. The section outlines the contents of the Sustainable Community Strategy, which has been subject to its own consultation process and which is not possible to amend in response to this consultation.
CSIO/49	Ms Samantha Turner Principal Planning Officer 4NW	Sustainable Community Strategy: An emphasis is placed on reducing CO2 emissions, an area which can obviously be addressed through transport. In addition, the need to connect people with employment and other services is identified, as is the need for sustainable travel and adequate interchange between these modes of travel. These policies are all in line with RSS objectives.	Comments noted particularly as regards consistency with RSS.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/233	Janet Belfield Natural England	<p>Section 3 - Sustainable Community Strategy (SCS)</p> <p>We welcome broad coverage of the majority of our environmental interests in the SCS Vision. However, it does not refer to geodiversity alongside biodiversity, and although it refers to 'well maintained areas of natural beauty ...' this statement is limited and implies exclusivity. We would welcome rephrasing to 'landscapes and townscapes' so as to include all urban and rural areas and not just areas of existing natural beauty.</p>	<p>The Sustainable Community Strategy was subject to its own preparation processes and consultation. Changes to this document cannot be made through this process.</p>
CSIO/165	Louise Morrissey Peel Holdings	<p>2.3 Peel agrees that the Core Strategy must be integrated with other plans and initiatives such as the Sustainable Community Strategy but would caution that the Core Strategy must take account of the specific Health & Safety as well as access and maintenance requirements associated with the Manchester Ship Canal which often mean that public access needs to be curtailed and controlled. The Manchester Ship Canal is a commercial waterway rather than a leisure water way and as such has markedly different operating and safety characteristics. The seventh bullet point under the heading 'Our Environment' in the CSOIR appears to indicate that spaces adjacent to the Canal will function as '...a focus for local amenity' but the canals contribute to overall connectivity throughout the borough and link green spaces; they are not 'green spaces' in and of themselves.</p>	<p>Comments noted. Future documents will reflect these comments.</p>
<p>Section 4: A Vision for the Core Strategy – Question 2 - Is this an appropriate vision for Warrington?</p>			
CSIO/145	Warrington & Co	<p>1. The Board felt that the Core Strategy would benefit from a clear sense and definition of Warrington's role and ambition in the region. In particular: how can Warrington position itself as a major economic player in the Northwest of England that significantly adds to the potential of the region and equally derives benefit from its location relative to other major cities?</p> <p>2. Following on from the first point, the Board feels that there needs to be a clear definition of the adequate size and capacity of the town in order to fulfil that potential; ie how far and how fast should Warrington grow in the next 20 years as a consequence, and what are the consequences for spatial planning, infrastructure and land use in the town?</p>	<p>Comments noted. The vision will be amended to reflect Warrington's regional position.</p> <p>Further work on the Core Strategy options will allow a clearer idea of the capacity of the town to develop and the implications of future growth.</p>
CSIO/14	Laurie Lane CBRE for First Alliance Properties	<p>We support the current vision for Warrington, particularly where it states, 'The town centre and its surrounding area are the vibrant focus of the borough for retail, leisure, entertainment and business providing plenty to do and see for people of all ages and interests throughout the day.'</p>	<p>Support noted.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
		Focussing on the town centre is important. Not only does it embody the central tenets of national guidance, but it will encourage competition and avoid leakage of expenditure elsewhere.	
CSIO/26	Alan Hubbard National Trust	<p>Whilst the Vision makes a passing nod to landscape character and the Borough's environmental assets it is considered that these aspects need drawing out more carefully. Specifically:</p> <ul style="list-style-type: none"> • in the penultimate bullet point it is considered that there should be direct reference to landscape character (rather than just countryside) together with an aspiration to see its distinctiveness reinforced. • in the final bullet point the issues relating to the environment need to capture the concepts of protection and the wider settings of these assets which, especially in terms of heritage, are a fundamental part of their overall significance. It is suggested that alternative wording along the lines of "The unique elements of the built and natural environment that Warrington possesses and their wider settings are protected, enhanced and well managed." 	Comments noted. The vision will be amended where appropriate.
CSIO/20	CBRE for United Utilities	We support the current vision for Warrington, particularly "high quality, safe, secure and inclusive living environments that meet residents' needs and encourages healthy lifestyles".	Support noted.
CSIO/40	Phil Lally Government Office for the North West	<p>1. There is a need for the vision to be set within the wider spatial context mentioned above and to identify cross-boundary issues. This is necessary in order to address the soundness test concerning coherence with the core strategies prepared by neighbouring authorities. The vision for Warrington, located as it is between two major conurbations, cannot be an isolated one. The role of the borough within the wider sub-region therefore needs to be set out. In addition, cross boundary issues concerning, for example, housing market areas, employment and transport should also be addressed. These sub-regional and cross boundary matters should also be picked up in terms of strategic objectives.</p> <p>2. The emerging St Helens Core Strategy has a proposal for a major rail freight interchange at Parkside. What implications does this have for Warrington?</p> <p>3. Besides having regard to these wider sub-regional and cross boundary matters, the vision should also be developed further so that it is more locally distinctive. It should have regard to the different parts of the Borough and the future roles of these areas.</p> <p>4. The vision needs to be developed further to provide greater clarity as well as making it more place specific, as some aspects are vague and could apply anywhere. For example:</p>	<p>Comments noted. Future documents will further address cross boundary issues and set Warrington in the sub-regional and regional context. Major cross boundary proposals such as Parkside and their implications will also be considered in more detail in future documents and work.</p> <p>Comments on the vision itself and its local distinctiveness are noted. This will emerge as the vision evolves in future documents as a preferred option for the spatial strategy for Warrington emerges.</p> <p>Reference to the Strategic Framework for Warrington set out in RSS Policy MCR6 will be included in future documents.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>I. "By 2030 Warrington is firmly established as an outstanding place in the North West, fulfilling a key role in the regional economy and is a location of choice for national and international business". Being an outstanding place in the North West is a very vague aspiration. What does it involve? What will the borough's role in the regional economy be? What are the implications for different parts of the borough?</p> <p>II. "Omega is established as a successful location for sustainable economic development.....". The future role of Omega would seem to be uncertain as one of the objectives refers to a review to decide on an appropriate mix of uses on the site. How will it be a location for sustainable economic development given its apparent poor accessibility by public transport? How well does Omega accord with the criteria set out in RSS Policy W2 for Locations for Regionally Significant Economic Development?</p> <p>III. "The town centre and its surrounding areas are the vibrant focus for the borough for retail, leisure, entertainment and business". The reference to 'surrounding areas' is unclear. PPS6 indicates that such uses should be within town centres.</p> <p>5. Reference needs to be made to the Strategic Framework for Warrington set out in RSS Policy MCR6.</p>	<p>Comments noted. It is acknowledged that Birchwood is a very important component of the forward supply of employment land in the borough that will continue to be supported.</p>
CSIO/186	Lewis Evans Turley Associates	<p>The importance of Birchwood and Birchwood Park in supporting Warrington's economic growth and prosperity and seeking to address inequalities and skills shortages within the Borough is clearly reflected by the level of employment and number of businesses occupying the Park. This is recognised by the Warrington MBC Employment Land Review 2008 and the Warrington East Background Paper which forms part of the evidence base for the Core Strategy. However, despite its status the vision for the Core Strategy only refers to Birchwood as a business location which should be complemented by Omega.</p> <p>This lack of recognition of Birchwood's strategic importance of significant concern to MEPC as the vision will inform the objectives of the Core Strategy and suggested approaches. The vision therefore needs to properly acknowledge the important role that Birchwood Park has to play in the future of the Borough. The Vision should be reworded to reflect this.</p>	<p>Comment noted. The Core Strategy will have to be deliverable in order to be considered to be sound.</p>
CSIO/255	Mr Simon Artiss Bellway Homes	<p>General - we ask that the Core Strategy limits the amount of aspirational text (eg. Mission statements/visions etc) and focuses on policies that delivery its land-use objectives for the plan period. We want the document to have substance in its ability to deliver on the ground, as opposed to being simply a well-drafted policy document;</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/256	Mr Simon Attiss Bellway Homes	<p>Section 4 (Vision) - of the 10 bullet points listed in Para 4.2, none specifically refer to the issue of new homes. The closest we get is the provision of '<i>high quality, safe, secure and inclusive living environments that meet resident's needs and encourages healthy lifestyles</i>' which is rather woolly and non-specific. Surely a Vision for the Core Strategy should be embedded in such matters as the creation of sustainable communities, as required by Government policy, but also include specific and identifiable / measurable objectives. Including: 'the delivery of new homes to support the Borough's Growth initiative and its economic role and to provide for the housing needs of the area' and 'the identification of sufficient sites to deliver the required new homes to the Borough' or similar. The regeneration agenda should also be represented, including specific reference to projects / areas / sites where possible;</p>	<p>Comments noted. The vision and / or objectives will be amended to reflect this.</p>
CSIO/181	Stephen Brown Environment Agency	<p>The Municipal Waste Management Strategy for Warrington is key in helping the Borough to deliver the environmental objectives within the vision for Warrington. However, objectives should not be limited to just municipal waste but include commercial/industrial and construction and demolition wastes as identified by the targets in the RSS (Policy EM10). The waste objectives within the environmental objectives capture much of what the Waste Strategy for England 2007 sets out but could go further to capture the need for waste minimisation and re-use within the waste hierarchy outlined in Policy EM11 of the RSS.</p> <p>Paragraph 4.1 sets out critical infrastructure including transport 'as being a' ...strategic element of the Borough Portrait that shapes Warrington'. Paragraph 10.11 outlines what infrastructure is for the purpose of the core strategy. Waste facilities are omitted from this although several closely linked infrastructure such as delivery of energy and renewable energy, waste water treatment and disposal are included in order for the waste targets set out in the RSS (Policy EMP10) to be achieved, waste facilities need to be considered alongside other utilities infrastructure.</p> <p>We recommend the following amendment in the 'Our Environment' section (Page 10):</p> <p>Replace: '<i>A well used network of attractive and clean green spaces with River Mersey and our canals developed as a focus for local amenity and biodiversity.</i>'</p> <p>Objectives to help to deliver the vision for Warrington?</p>	<p>Comments noted. A Waste Needs Assessment is currently being carried out and the issue will be dealt with in more depth through the Core Strategy process. The assessment will look at commercial / industrial and construction and demolition wastes as well as municipal waste. 'Waste infrastructure is included within the Infrastructure Capacity Assessment currently being produced, which will be the subject of consultation.</p> <p>Comments regarding specific objectives are noted. The objectives will be reviewed and recast in the light of consultation responses.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>The waste objectives within the environmental objectives capture much of what the Waste Strategy for England 2007 sets out but could go further to capture the need for waste minimisation and re-use within the waste hierarchy outlined in Policy EM11 of the RSS.</p> <p>To avoid ambiguity we recommend that the following objective is re-worded from:</p> <p><i>'...to create multi-functional networks of green spaces and green corridors building on the borough's canals and rivers...' </i></p> <p>To:</p> <p><i>'...to create multi-functional networks of green spaces and green corridors by developing and enhancing the borough's wildlife corridors...' </i></p>	<p>Comments noted. A summary of the Borough Portrait will be included in future Core Strategy documents. Cross-boundary issues will also be made more explicit.</p> <p>An initial meeting with officers from Salford and Wigan has discussed a joint policy approach to the Mosslands. This will be further considered in future Core Strategy documents.</p>
CSIO/192	Chris Findley Salford City Council	<ol style="list-style-type: none"> Paragraph 4.1 of the vision refers to a 'Borough Portrait' which was consulted on in 2007. It would be useful to summarise the Borough Portrait in the Core Strategy, to explain the location and context within which the Core Strategy is being produced, and allow for any strategic cross boundary issues to be identified. As you will be aware, the Mosslands area that stretches across the administrative boundaries of Salford, Warrington and Wigan was subject to the development of a Mosslands Vision, which was published in February 2007. Salford's Core Strategy Issues and Options Report identifies the Mosslands as the city's most important biodiversity resource, with the restoration of a major area of degraded lowland raised bog being specifically identified in its spatial vision. The Mosslands Vision explains that a coordinated approach will be required to address the fragmentation and decline of the landscape, and realise its potential. The Core Strategy Vision for Warrington should therefore reflect the importance of the long term sustainable management of the Mosslands and aim for a strategic approach to their conservation. I would welcome the opportunity to have a meeting at the earliest opportunity to discuss the approach to the Mosslands, and the need to progress in a coordinated manner, to ensure that a consistent approach to this issue is taken across the three local authorities (including Wigan) through appropriate policies in their Core Strategies. 	

ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/5	Mr Derek Warren	The vision is remarkable but based on recent developments is misleading. Where will the Omega site be with a prison and waste incinerator. Not much room for offices and industrial units or do you consider that by having an incinerator that (by accounts from other incinerators) gives out noxious and "smelly" fumes will attract "fulfilling a key role in the regional economy and is a location of choice for national and international business"	The Core Strategy will consider the appropriate land use mix for the Omega site and the implications for the surrounding area, taking account of the vision and objectives for the borough. The site does not have planning permission for an incinerator or a prison.
CSIO/61	Mr David Hardman Asset Protection United Utilities	The flood resilience of new development is very important and all forms of flood risk should be considered in making site allocations.	Comments noted. The Core Strategy will follow the principles set out in Planning Policy Statement 25 which deals with flood risk issues. The Strategic Flood Risk Assessment will ensure that all forms of flood risk are taken into account in Core Strategy preparation.
CSIO/97	Lauren Ashworth How Planning for United Utilities	Question 2 - Is this an appropriate vision for Warrington Yes. The vision places a strong emphasis on Warrington's economic growth and its role in the local and regional economy. The vision specifically refers to Omega as a location of choice for national and international business. The vision should also refer to Lingley Mere Business Park as a location of choice for business. Lingley Mere Business Park is an important established employment area with planning permission for further expansion to assist with economic growth. The vision acknowledges the need for future growth and expansion of neighbourhoods, which is required to ensure delivery of sufficient housing in line with regional housing targets.	Support noted.
CSIO/106	Greater Manchester Geological Unit	GMGU broadly agree with the vision for Warrington	Agreement noted.
CSIO/72	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning	In general we agree with the vision for the future of Warrington. However, we would exercise caution over the reliance on the Omega site becoming fully established as a location for sustainable economic development. It is acknowledged that this site provides an excellent opportunity for the expansion of employment opportunities within the borough, however, this site has remained undeveloped for a number of years and through a period of relative economic buoyancy. A significant shift in the approach to how this opportunity is to be developed is needed if investment is to be attracted to the area and the site is to retain its regional importance.	General agreement noted along with caution over Omega site and support for the A49 corridor and the town centre providing a focus for retail, leisure, entertainment and business.

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ID	Name and Organisation	General Comments	WBC Officer Comments
	Cushman & Wakefield LLP	<p>The A49 is identified as a key gateway and important corridor on the approach to Warrington Town Centre which can become a focal point for economic growth. The continued investment in this area will help to stimulate the future attraction of the corridor and enhance business and enterprise opportunities.</p> <p>It is important that the town centre and its surrounding areas provide a focus for retail, leisure, entertainment and business making provisions available for a variety of people with varied interests.</p>	
CSIO/112	Satnam Millenium Ltd	<p>We agree with the vision set out for Warrington, especially those elements which seek to improve existing neighbourhoods and provide a life-changing opportunity for all concerned.</p>	Agreement noted.
CSIO/147	Warrington & Co	The Board believes that the vision is generally appropriate.	Comment noted.
CSIO/158	Mrs Sarah Jones Turley Associates	The vision is endorsed - we question the role for Omega as 'complementing the town centre'	Endorsement noted. The relationship between office provision within the town centre and in other employment locations will be further examined during Core Strategy production.
CSIO/197	Mrs Jacqueline Johnson Cheshire Branch CPRE	<p>Question 2. Is this an appropriate vision for Warrington?</p> <p>Add "More food is locally produced and the aim is to increase this amount. The rural economy is supported and farmland has not been lost to development."</p> <p>There is a strong focus on economic growth, but as this is a Vision it should be setting out what that economic growth is intended to achieve, i.e. better quality of life in a range of ways for ALL the residents of Warrington. It should also set out how this growth will contribute to improved quality of life and in particular to reducing disparities/inequalities. We strongly support "All development is set in the context of a secure, long term Green Belt and countryside that is sustainable and attractive with a thriving rural economy and communities."</p>	Comments noted. Comments will be taken into account in reviewing the vision for future documents as the Core Strategy progresses.
CSIO/226	Mr M Durrington Culcheth and Glazebury Parish Council	Question 2. Is this an appropriate vision for Warrington? Yes	Agreement noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/234	Janet Belfield Natural England	<p>Section 4 - A Vision for the Core Strategy</p> <p>We would wish to see a Vision that covers issues important to us including conservation and enhancement of local landscape (and townscape) character and quality, biodiversity and geodiversity, and opportunities for recreation and access to the countryside and green spaces.</p> <p>We would welcome amendments to the vision to include the above.</p>	Comments noted. The vision will be amended where appropriate.
CSIO/166	Louise Morrissey Peel Holdings	<p>Peel supports the Council's overall Vision for the Core Strategy as detailed in [4.2]. The aspirations for growth encapsulated within the Vision will be challenging particularly in light of the current economic downturn and realisation of the Vision will necessitate a positive attitude toward development that takes full account of project economic viability.</p> <p>2.5 The seventh bullet point of the Vision set out under [4.2] is entirely focused on private transport choice. In the Core Strategy the focus must be broadened to encompass the issue of achieving a better distribution of road, rail and canal <input type="checkbox"/> based freight transport</p>	Support noted. Comments regarding the seventh bullet point of the vision noted. The vision will be amended to reflect commercial travel choices.
CSIO/207	Stephen Hughes Sport England	<p>Sport England considers that specific reference should be made to improving the quality of life in the Borough and the means of achieving this. Good access to a wide range of sport and recreation facilities (both informal and formal) will play a central role in this, and make an important contribution to securing other aspirations such as a health improvement.</p>	Comment noted. The vision will be amended to reflect this.
CSIO/216	Eng Klaus Armstrong-Braun	<p>Relatively yes. Add:</p> <ul style="list-style-type: none"> • Provide a high quality of life for all Warrington's citizens without causing deterioration of the quality of life of all other species • Maintain or create distinctiveness in the urban area so as to allow communities to "own" the place they live in • A place in Warrington for all young people; inclusive and not exclusive • Women will have a full part also in the life of the community of Warrington and their specific needs as parents 	Comments noted. Comments will be taken into account in reviewing the vision for future documents as the Core Strategy progresses.
CSIO/224	Mr John Brooks Director GVA Grimley for the Homes and Communities Agency	<p>The vision for Warrington is ambitious but achievable. The JV would support the commitment of Omega as a successful location for sustainable economic development.</p> <p>Having regard to the potentially broader range of uses for Omega outlined above the JV would suggest that Omega is capable of contributing to other elements of the Warrington Vision.</p>	Support and comments noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
Section 5: Objectives			
CSIO/45	Rebecca Burnhams Drivas Jonas for Universities Superannuation Scheme	<p>Question 3 - Will these objectives help to deliver the vision for Warrington?</p> <p>The Core Strategy vision:</p> <p>"By 2030, Warrington will be recognised as one of the best places to live and work in the UK where everyone enjoys an outstanding quality of life."</p> <p>The Core Strategy seeks to create a framework to guide regeneration through public and private investment and promotes economic environmental and social well-being for Warrington. It also seeks to co-ordinate and deliver the public sector components of this vision with other agencies and processes.</p> <p>Employment</p> <p>Opus 9 on Calver Road is allocated in the existing UDP as an Existing Employment Area. It is also situated close to a Greenway Network, Trunk Roads and Primary Routes. Policy EMP4 states that <i>'the Council will approve planning applications for development, redevelopment and changes of use within existing employment areas as shown on the Proposals Map, provided that the use falls within Use Classes B1, B2 or B8, or is a sui generis employment use, or other appropriate use that will contribute to the local economy'</i>.</p> <p>These uses will only be accepted if they satisfy the following criteria: the development provides for access in accordance with the transport priorities, there is no detriment to the amenity of people living or working nearby or to the effective use of other nearby land, and in cases of new development or redevelopment, then design and appearance of the development relates well to its setting and the character and quality of the local environment.</p> <p>The core strategy aims to ensure that an appropriate level of economic development is planned for in Warrington. There are therefore a number of economic objectives set out in the core strategy, which seek to:</p> <ul style="list-style-type: none"> • make provision for a supply of employment land to support the business sector and ensure that sustainable economic development is not held back by a lack of suitable sites; • review and decide on an appropriate land use mix at the regionally significant Omega site; • promote a hierarchy of strong and viable centres; • support the sustainable diversification of the rural economy; and • assist the economic development potential of tourism in Warrington. 	<p>Support for economic development aims noted. An assessment of an appropriate level of provision of employment land and the availability of existing sites will be undertaken as part of the evidence base for Core Strategy production.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/264	Lisa Henderson Highways Agency	<p>USS supports these aims but encourages the Council to make provision for a supply of employment land to support the business sector and to ensure that sustainable economic development is not held back by a lack of suitable sites. Existing employment sites should however, be considered in the first instance for expansion, given that this type of use is already established in this particular location. USS would encourage flexible employment uses in these location</p> <p>The objectives set out in the Sustainable Community Strategy (SCS) that are relevant to transport and accessibility, and therefore of consequence to the Agency, are:</p> <ul style="list-style-type: none"> • To make provision for a supply of employment land to support the business sector and ensure that sustainable economic development is not held back by a lack of suitable sites; • To review and decide on an appropriate land use mix at the regionally significant OMEGA site; • To improve and maintain Warrington's existing transport infrastructure in good order; • To improve journey time reliability and tackle congestion in the borough's main transport corridors and around the town centre; • To secure a shift towards the use of more sustainable modes of transport with a focus on public transport, walking and cycling; • To secure safe and efficient access by all modes of transport between residential areas and the town centre, peripheral employment areas, schools, shops and other local services including health; • To improve surface access and interchange arrangements to and between transport modes particularly at Central and Bank Quay and Birchwood Stations; • To reduce the adverse impacts of transport, in terms of road safety hazards, climate change, environmental pollution, residential amenity and social exclusion; and • To integrate the management and planning of transport systems to address needs arising from new development. 	<p>Comments and support for objectives noted.</p> <p>The Agency would support any objectives that aim to encourage sustainable travel and reduce the need to travel by private car. In addition, any improvements to accessibility and connectivity would also be welcomed. Whilst we recognise the need for Warrington Borough Council (WBC) to identify sites for future economic growth, these sites should come forward sustainably and not be at the detriment of the safety and operation of the SRN. Due to the SRN's proximity to Warrington and Birchwood, sustainable sites will need to be identified that fully utilise public transport, walking and cycling, and reduce the need to travel by private car.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/15	Laurie Lane CBRE for client	<p>We support the objectives identified to deliver the vision for Warrington. However, we suggest that to correlate with the Vision, the fourth bullet in the Economic Objectives section should read, 'from Warrington town centre and its surrounding area for the concentration of retail, office, leisure and recreational development. Edge of centre and out of centre development may be appropriate where it meets a specific need and does not detract from the vitality and viability of the main town centre'. This is because development in the surrounding areas will provide the opportunity for high quality development to come forward and support the vision for the borough, complimenting investment in the core of the town centre.</p>	<p>Support and comments noted. Objectives will be recast to align with spatial vision and to ensure they are deliverable and measurable. Any revision will need to recognise that sequentially preferable sites will take precedence over edge of centre and out of centre locations.</p>
CSIO/21	Laurie Lane CBRE for United Utilities	<p>We support the identified objectives. In particular, we consider the United Utilities site would assist in delivering the 'social objectives' as it will deliver new housing and improvements to community facilities, as well as creating a sense of community. We also consider that it will support the environmental objectives. It may be worth adding to the environmental objectives "permitting development where flood risk can be mitigated".</p> <p>The "Suburban" Areas of the Town: Paragraphs 8-20-8-22 - We consider that reference should be made to the United Utilities site in this section, as it is a site that has been granted planning permission and would provide regeneration benefits.</p>	<p>Support and comments noted.</p>
CSIO/27	Alan Hubbard National Trust	<p>It is considered that some additional development of the objectives is needed to ensure that the Vision is achieved, especially in the context of the response above to Question 2.</p> <p>Environmental Objectives:</p> <ul style="list-style-type: none"> the approach to multi-functional networks of green spaces is strongly endorsed; however, the wording in respect of building on the Borough's canals and rivers is perhaps a little unfortunate ("..green corridors reinforcing existing quality provision in the Borough as exemplified by its rivers and canals"?). there is an absence of any objective in respect of the built environment, including archaeological resources - this gap needs to be filled. 	<p>Comments noted. The Objectives are being reviewed and recast in light of consultation responses.</p> <p>Overall - it is suggested that whilst there are elements of an approach here towards addressing climate change issues that there is in fact the opportunity to have a set of climate change objectives, e.g. based upon reducing emissions, the prudent use of resources, ensuring that new development and existing environmental resources (water, air, biodiversity, heritage) are resilient to those impacts that are now unavoidable.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/41	Phil Lally	Objectives	<p>Comments noted and agreed. The objectives will be recast to align with the spatial vision and to ensure they are deliverable and measurable.</p> <p>Specific comments on particular objectives will be taken into account.</p>
	Government Office for the North West	<p>1. The objectives will need to be clarified and developed so that they have clear outputs, targets and indicators. At present they are vague, largely aspirational and not capable of measurement.</p> <p>2. Another problem is that the objectives are set out in a largely thematic way and there is little spatial content. If the vision could be made more locally distinctive, as indicated above, this would assist in leading to more spatial objectives and, in turn, a spatial strategy. As PPS12 says, the overall vision in the Core Strategy should set out how the area and the places within it should develop, the strategic objectives should focus on the key issues to be addressed, and the delivery strategy for achieving these objectives should set out how much development is intended to happen where and when, and the means by which it will be delivered.</p> <p>3. In their present form there are a number of comments to make on the objectives.</p>	<p>The economic objectives:</p> <ul style="list-style-type: none"> ● “<i>to make provision for a supply of employment land.....</i>” - How much and what type of land is needed for various employment uses? What are the broad locations for economic development? How will the current overprovision of employment land be addressed? ● “<i>To review and decide on an appropriate land use mix at the regionally significant Omega site</i>” - This is not an appropriate objective. The review of the site should inform the preparation of the Core Strategy. ● “<i>to promote a hierarchy of strong and viable centres</i>” - The Core Strategy will need to deal with the scale of retail, office and leisure development proposed for Warrington Town Centre. It should also set out the strategy for other centres. ● “<i>to support the sustainable diversification of the rural economy</i>” - This is rather vague and the ways in which the rural economy is to be diversified could be set out. ● “<i>to assist the economic development potential of tourism</i>” - This is also vague and needs to be developed further. <p>The social objectives:</p> <ul style="list-style-type: none"> ● “<i>to promote healthy, safe, cohesive, mixed and thriving communities where people will want to live now and in the future</i>” - This is not locally distinctive. There is a need for objectives to deal with the places within the borough in a more integrated way. ● “<i>to deliver a better balance between housing demand and supply</i>” - This is unclear. The approach to housing delivery needs to be consistent with that set out in PPS3. The

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>objectives will need to be clearer about the amount of housing to be delivered, its distribution, and the mix of housing to be provided, including affordable housing.</p> <p>The transport and environmental objectives need to be developed further so as to make them more locally distinctive and to provide greater clarity.</p>	
CSIO/257	Mr Simon Artiss Bellway Homes	<p>Para 5.1 - might be useful to confirm the relationship of all of these various strategies to the LDF process and what weight they have in the statutory planning process;</p>	<p>Comment noted. Future documents will aim to clarify the relationship between these strategies and the weight that they have in the statutory planning process.</p>
CSIO/193	Chris Findley Salford City Council	<p>Reference to improving journey time reliability on the main transport corridors is supported. This is consistent with objective ix) of Salford City Council's Core Strategy Issues and Options Report, which seeks to improve journey times on the M60 and M62 motorways in Salford. It will be necessary to ensure that development proposals support this approach, both in terms of their scale and location.</p> <p>Further to the comments made on the vision, it is considered that there should be an objective relating to the Mosslands. Objective xvii) of Salford's is '<i>to commence by 2027 schemes for the managed restoration of at least 300 hectares of degraded lowland raised bog</i>'.</p>	<p>Support for improving journey time reliability noted.</p> <p>Comments regarding an objective relating to the Mosslands are noted and will be taken into account when the objectives are recast to align with the spatial vision and to ensure they are deliverable and measurable.</p>
CSIO/187	Lewis Evans Turley Associates	<p>The objectives set out include a number of Economic Objectives which place an emphasis on concentrating office uses in Warrington town centre. Such an approach is consistent with national planning policy set out in PPS6; however the objectives should also recognise the complementary role that the offices in other identified employment locations can play in supporting the town centre office market. The office market is such that many operators will not consider town centre locations due to the nature of their use and operation needs. Non town centre office locations provide for these businesses and ensure that the economic benefits they offer are not lost to other boroughs. This is particularly true in Warrington where important employment locations such as Birchwood and Birchwood Park have been, and continue to be, instrumental in attracting new employers to the Borough. The objectives should recognise this and seek to build on this success.</p>	<p>Comments regarding the balance between town centre office provision and office provision in important employment areas are noted and will be reflected in future documents.</p> <p>The objectives will be recast to align with the spatial vision and to ensure they are deliverable and measurable.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/62	Mr David Hardman Asset Protection United Utilities	With Habitats Directive, Water Framework Directive and Climate Change we cannot be complacent about drinking water sources and the need to manage demand in new and existing development will become more important.	Infrastructure planning undertaken to support Core Strategy development will address this issue.
CSIO/98	Lauren Ashworth How Planning for United Utilities	<p><u>Economic Objectives</u></p> <p>The first and arguably most important economic states: 'to make provision for a supply of employment land to support the business sector and ensure that sustainable economic development is not held back by a lack of suitable sites'. In order to achieve the vision of Warrington playing a key role in the regional economy and attracting national and international businesses, it is essential that sufficient employment land is available in a range of locations to suit a variety of businesses including small businesses who have an important role in supporting the local economy.</p> <p>The second objective relates to Omega and states: 'to review and decide on an appropriate land use mix at the regional significant Omega site'. This should be amended to include reference to Lingley Mere Business Park. When reviewing appropriate land uses, the Council should be mindful of the suitability of this area to provide a range of other uses which would assist in creating a sustainable, mixed use development.</p> <p><u>Social Objectives</u></p> <p>The social objectives relate primarily to housing and communities. The objectives will help to deliver the vision in respect of the future growth of neighbourhoods and it is particularly important, in line with PPS3, that not only is additional housing provided to deliver a better balance between housing demand and supply, but that housing is promoted in locations where people want to live in order to improve choice. The social objectives are therefore supported.</p>	Comments regarding the objectives are noted. The objectives will be reviewed and recast in the light of consultation responses.
CSIO/107	Greater Manchester Geological Unit	<p>GMGU welcome the inclusion of waste as part of the 'environment objectives'. Capturing the energy value of waste should be considered as part of an integrated approach to sustainable waste management.</p> <p>The Environmental Objectives (end of Section 5) should include something about prudent use of resources, particularly minerals and sites capable of receiving waste.</p> <p>Should waste sites be included in 10.11 Utilities Infrastructure?</p>	Support noted. Comments regarding the objectives are noted. The objectives are being recast / reassessed in the light of consultation responses. Waste has been included in the infrastructure planning work that is being undertaken to support the Core Strategy.

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>In preparing the Core Strategy it will be necessary to consider the requirements of PPS10 which states that the core strategy should set out policies and proposals for waste management in line with the regional spatial strategy and ensure sufficient opportunities for the provision of waste management facilities in appropriate locations including for waste disposal. The core strategy should both inform and in turn be informed by any relevant municipal waste management strategy.</p> <p>There is no mention of the sustainable use of minerals or need to safeguard mineral resources, which should be included as part of the 'environment objectives'. Minerals are an important resource which are essential to built development and should be included in the Core Strategy in line with Minerals Policy Statement 1.</p> <p>The growth agenda in Warrington will mean that an adequate and steady supply of minerals is essential and that this provision is made in accordance with the principles of sustainable development. This is particularly the case in terms of the supply of aggregates and the importation of these from outside the Borough.</p>	<p>Both a Waste Needs Assessment and Minerals Study are being undertaken to provide evidence and inform the Core Strategy.</p>
CSIO/142	Nicola Sewell Indigo Planning for Prudential Pensions Ltd	<p>Objectives of the Core Strategy - Question 3 The draft Economic Objectives include reference to the need to promote a hierarchy of strong and viable shopping centres. However, it does not provide any recognition of the complimentary and supporting role that the retail parks perform in supplementing the retail offer of these centres. It is recommended that an additional objective should be included, stating the following:</p> <p>"To support the ongoing role that the retail parks perform in supplementing the retail offer of the hierarchy of the centres."</p> <p>The retail parks function as an integral part of the retail hierarchy as they are complimentary to Warrington Town Centre and beneficial to the local economy, in retaining as much retail expenditure as possible within the Borough.</p> <p>Retail Parks provide economic benefits such as employment and attracting investment, in addition to meeting shopping needs. Retail Parks offer the opportunity to provide an alternative form of retail provision to that found in the town centres, thereby providing a wide range of choice of retail facilities (i.e. 'consumer choice') as well as meeting modern retailer requirements (i.e. inward investment). The complimentary, combined offer of the centres and retail parks maximises the economic benefit of the retail sector for the Borough, and this relationship should therefore be recognised.</p>	<p>Out of centre retail parks are not promoted or protected by national Government Policy. It would therefore not be appropriate to include these sites within the hierarchy of retail centres identified within the Development Plan. The role of the retail parks is recognised in the capacity calculations of the Retail and Leisure study.</p> <p>The capacity element of the Retail and Leisure study is currently being updated. This will identify whether further retail floorspace can be supported within Warrington Borough. If the evidence shows that further floorspace can be supported and evidence suggests that allocations may be necessary, these will be made in accordance with the sequential approach set out in Government guidance.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>There are several retail parks in the Borough which are situated in highly accessible locations in the inner Warrington area and well related to the town centre such as Pinners Brow Retail Park situated in an edge of centre location.</p> <p>In addition, there is also Gemini Retail Park which is also situated within a highly accessible location as it has its own bus terminus which provides good links to the Town Centre.</p> <p>In addition, enhancing or improving consumer choice will assist in achieving the vision for Warrington as set out in Section 4 of the CSIO, which states: "It will be one of the best places to live and work in the UK. Where everyone enjoys an outstanding quality of life".</p> <p>Paragraph 4.2 of the CSIO states that this means that: "The Town Centre has developed as a focus for economic growth, building on investment in regeneration and restructuring and improvement of the older parts of the town including the northern spine (A49 corridor); and The Town Centre and its surrounding area are the vibrant focus of the Borough for retail, leisure, entertainment and business providing plenty to do and for people of all ages and interests throughout the day".</p> <p>(Indigo emphasis) Clearly, the CSIO recognises that there is a need for retail and leisure facilities to be situated within the Town Centre and its surrounding area to provide a vibrant focus of the Borough.</p> <p>Regeneration Area</p> <p>Indigo support Pinners Brow Retail Park being situated within the Regeneration Area as shown on Figure 6.1, as this area relates to other core areas of inner Warrington</p>	<p>Further expansion of out of centre retail parks may be appropriate, but only where justified by capacity, sequential and impact assessments.</p>
CSIO/73	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning Cushman & Wakefield LLP	<p>The objectives as set out within Section 5 will assist in the delivery of the vision for Warrington. We would however suggest the language for the fourth bullet point under the "Economic Objectives" sub heading be amended as follows:</p> <ul style="list-style-type: none"> ● In promoting a hierarchy of strong and viable centres: <ul style="list-style-type: none"> ● from Warrington town centre and the fringe areas as the location for the concentration of retail, office, leisure and recreational development. 	<p>Comments noted. The objectives will be recast / reviewed in the light of consultation responses.</p> <p>In accordance with Government policy, the Core Strategy will direct town centre uses towards the town centre, followed by edge of centre sites where appropriate.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/113	Sathnam Millenium Ltd	A targeted Growth Agenda, focusing on inner Warrington, will enhance the lifestyles and opportunities for existing communities and provide maximum opportunity for improvements arising from the Growth Agenda.	Comments noted
CSIO/159	Sarah Jones Turley Associates	Question 3 - Objectives to Deliver the Vision We consider that good design should be included as an environmental objective as endorsed by PPS1.	Comment noted. This is included as a key issue of development management.
CSIO/198	Mrs Jacqueline Johnson Cheshire Branch CPRE	Economic objectives This should again include an objective re reducing inequalities, e.g. reducing levels and concentrations of worklessness, ensuring that employment opportunities are accessible by sustainable and affordable means from areas in need of regeneration and/or where there are concentrations of deprivation. Replace "ensure that sustainable economic development is not held back by the lack of suitable sites" with " ensure that appropriate sites are available for sustainable economic development". Add "to support the rural economy and the production of local food" Environmental objectives We are pleased to see the reference to water resources - the Regional Strategy sustainability appraisal scoping report states that there are predicted water deficits for large parts of the region's population by 2014. To "create multifunctional networks." add "and to preserve existing green spaces and corridors" The bullet points re "to produce a concise waste strategy" should be stronger, referring directly to "treating waste at as high a level of the waste hierarchy as possible" and therefore focusing firstly on reducing waste generation (not just the impacts of waste generation), secondly on re-using products and materials, and only then on recycling (and composting). Add a reference to maintaining and enhancing landscape character and relative tranquillity These objectives will help to deliver the vision.	Comments noted. The objectives will be reviewed and recast in the light of consultation responses. Comments made will be reflected in future drafts of the objectives"

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/227	Mr M Durrington Culcheth and Glazebury Parish Council	Question 3 . Will these objectives help to deliver the vision for Warrington? Yes	Support noted.
CSIO/148	Warrington & Co	<p>Q3 - The Board believes that the objectives are generally acceptable in themselves but appear unambitious and very inwardly-focused. The Board would suggest the following additions:</p> <ul style="list-style-type: none"> • Economic potential - <ul style="list-style-type: none"> • Release the full potential of existing locations, including Birchwood, Woolston Grange, Northern Spine and Winwick Quay; • Develop new locations linked to the Waterfront and the Manchester Ship Canal Corridor • Transport linkages - ensure adequate links to the strategic transport network, including road, rail, port/waterways and air. <p>In addition, the Board suggests that the following strategic sites be added:</p> <ul style="list-style-type: none"> • Manchester Ship Canal / Port Warrington • Birchwood • Woolston • Northern Spine 	<p>Comments regarding the objectives are noted. The objectives will be reviewed and recast in the light of consultation responses.</p> <p>Reference to all of sites suggested will be included within future documents.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/235	Janet Belfield Natural England	<p>Social objectives</p> <p>In the 2nd bullet point - We welcome the reference here to 'reasonable access to recreational facilities', and request that you ensure it includes green spaces and not just built facilities.</p> <p>Transport objectives</p> <p>In the 4th bullet point - We request that access to recreational opportunities be also included.</p>	<p>Comments noted. Objectives will be amended and comments taken into account where appropriate.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
	Environment objectives	<p>We are disappointed that the Objectives do not refer to conservation and enhancement of local landscape (and townscape) character and quality, conservation and enhancement of biodiversity and geodiversity, and conservation and enhancement of opportunities for recreation and access to the countryside and green spaces. We would welcome revisions to the environment objectives to include them.</p> <p>In the 2nd bullet point, we would welcome specific mention of 'green infrastructure' and would welcome all existing assets being used as the foundation; not just rivers and canals.</p>	<p>Detailed comments regarding the objectives are noted. The objectives will be reviewed and recast in the light of consultation responses. Future iterations of the objectives will reflect the comments made.</p>
CSIO/167	Louise Morrissey Peel Holdings	<p>2.6 Peel agrees that the twenty two objectives identified by the Council listed under [5.2] of the CSIOR will assist in the delivery of the Vision for the Core Strategy, subject to the observations below.</p> <p>2.6.1 In the Core Strategy the third and fourth bullet points under the heading 'Social objectives' need to be addressed as one in order to reflect the inter-relationships between housing demand, supply and provision of affordable housing.</p> <p>2.6.2 It is again evident under the heading 'Transport Objectives' that the focus is on achieving modal shifts for private individual journeys. The significant impact that commercial freight movements can have on congestion and environmental quality appears to be overlooked. The potential role of the Manchester Ship Canal in achieving the Government's stated objective of securing a redistribution of freight traffic onto modes other than roads must be acknowledged and reflected in the Core Strategy objectives.</p> <p>2.6.3 The second bullet point under the heading 'Environment Objectives' does not need to include reference to canals and rivers. It is sufficient to state that it is a Council objective to 'create multi-functional networks of green spaces and green corridors'.</p> <p>The inclusion of 'buildings on the borough's canals and rivers' does not add anything to this objective and may in fact create the impression that such linked spaces are appropriate only within canal and river corridors. This should be addressed in the Core Strategy.</p>	<p>Agreement noted.</p>
CSIO/175	Peter and Irene Sargeant	I have serious doubts in relation to Question 3. The objectives derived stand in conflict, to a greater or lesser degree, with development along the Ship Canal (Moore), at Omega and Parkside, among other locations.	Comments noted. The objectives will be reviewed and recast in the light of consultation responses.

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ID	Name and Organisation	General Comments	WBC Officer Comments
		Nor is there a Question 3a, which enables one to put forward additional sites of strategic significance, for consideration in the mix. Omega and Peel Hall are in; however, Moore and Parkside are not.	Future documents will consider the strategic significance of the Moore and Parkside sites.
CSIO/208	Stephen Hughes Sport England	Whilst Sport England agrees with social objective of reasonable access to recreational facilities, the objective should be more specific about why this is important and different ways in which it can be achieved. For example, access to high quality opportunities to participate in sport and recreation should be fundamental part of delivering sustainable communities, and can be secured through the protection, enhancement and provision of new facilities.	Comments noted. The objectives will be reviewed and recast in the light of consultation responses.
CSIO/209	Stephen Hughes Sport England	Sport England welcomes the reference made to sport and its contribution (10.11) as the basis for the protection and provision of sports facilities, and their relationship with other facilities. In all cases, there should be a sound understanding of need, and in that regard reference should be made to a PPG17 Assessment of Open Space and Sports Facilities, prepared as the reference point for objective-setting, policy making and standard setting.	Comment noted. An appropriate evidence base will be in place to justify and support the Core Strategy approach.
CSIO/217	Eng Klaus Armstrong-Braun	Relatively yes. Add: Protect the fresh water easyflow from pollution, degradation and harmful extraction	Comment noted. The objectives will be reviewed and recast in light of consultation responses.
CSIO/33	Mr Roger Lamming Secretary Croft Residents Action Group	It is noted that development in the countryside should be restrained which we would support. However, to maintain the current Green Belt boundary this should be restricted to opportunistic redevelopment of land outside of the Green Belt. Any development in the Green Belt should concentrate on derelict buildings eg barn conversions, renovation of farm buildings etc. This would secure the current boundaries well into the future beyond 2021.	Support and comments noted.
Section 6: What are the component places that comprise building blocks for the Core Strategy?			
CSIO/42	Phil Lally Government Office for the North West	It is unclear how these sections relate to the key issues, vision or objectives. It is here, though, that spatial issues start to emerge. In the light of the comments above, it would be useful if material here could inform a more place based approach towards identifying the key issues from which could emerge a more integrated spatial vision and set of strategic objectives.	Comments noted. The areas identified will form the basis for a more spatial approach in future documents. Further work will be carried out on the relationship of the Key Issues identified to these areas and the implications for the vision and objectives for each of these areas.
CSIO/128	CBRE for client	The Council identified the 'Suburban' areas of the town as one of the strategic sites and areas. Gemini Business and Retail Park is located within the 'Suburban' areas of town and therefore supports the Council's identification in Paragraph 6.2.	Support noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/74	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning Cushman & Wakefield LLP	A number of Strategic Sites and areas have been identified within Section 6. Given the important "gateway" opportunity the A49 corridor presents we feel that this should be included as one of the strategic areas. This area extends from the M62 to the town centre and is the "shop window" for the town. At present the corridor is characterised by unpleasant vistas which do not attract people in to the centre. The inclusion of the corridor as a Strategic Area for development would encourage regeneration of key sites and promote environmental improvements along the A49.	Comments noted. The gateway corridor will be referred to in future documents as part of the strategic areas identified. This may justify a particular policy approach for the area.
CSIO/81	Jasmine So Planner CB Richard Ellis for First Alliance Properties	The Council identified the 'Suburban' areas of the town as one of the strategic sites and areas. Gemini Business and Retail Park is located within the 'Suburban' areas of town and therefore supports the Council's identification in Paragraph 6.2.	Support noted.
CSIO/258	Mr Simon Artiss Bellway Homes	Section 6 - the title is rather confusing: what does 'component places' and 'building blocks' actually mean and what is their purpose? If it is designed to assist our understanding of place does it achieve this and what does it include/exclude? It seems strategic and broad brush only;	Comment noted. The chapter is intended to identify areas and / or sites that require a specific policy approach - this will be clarified in future documents.
CSIO/236	Janet Belfield Natural England	Section 6 - What are the component places that comprise building blocks for the Core Strategy? In 6.1 we would welcome green infrastructure being considered of strategic significance and such sites planned and identified to enable strategic planning.	Comment noted. Whilst it is acknowledged that green infrastructure is of strategic importance, it may not be appropriate to show the green infrastructure network on this diagram. A separate green infrastructure network diagram will however support and ensure integration with the key sites and areas shown in this diagram.
CSIO/168	Louise Morrissey Peel Holdings	Peel is of the view that the list of strategic sites and areas set out in [6.2] is incomplete as it entirely omits the Manchester Ship Canal corridor. [Figure 6.1] should be updated to reflect the inclusion of this regionally significant geographic and economic feature, as shown at Appendix 1. The Manchester Ship Canal is a 'major port' as defined by the Department for Transport and handles in excess of 6million tonnes cargo per annum. Peel notes that at paragraph [5.2] the CSOIR states, with emphasis:	Comments noted. The Manchester Ship Canal will be added to figure 6.1 in recognition of its importance to the town.

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>'The overriding objective of the Core Strategy is to ensure that all relevant strategies are reflected in the framework for decision making in the borough.'</p> <p>The Regeneration Framework and programme identified in [5.2] <i>does</i> include specific reference to the Manchester Ship Canal corridor and goes further in depicting it graphically on a plan adduced to the aforementioned document. Omission of the Manchester Ship Canal corridor from [Figure 6.1] must not be carried through into the Core Strategy or there is a risk of inconsistency between Council documents.</p> <p>The Warrington Waterfront is identified as a Strategic Site and an area which it is understood will be subject to prioritised regeneration. It is noted that at paragraph [8.10] that the Council intend to bring forward the masterplan for this area and it is Peel's belief that such a masterplan must recognise and identify existing adjacent land uses, in particular the strategically important landfill site at Appley.</p>	<p>The Air Quality Management Areas in Warrington are designated as a buffer around the Motorways and around Wilson Patten Street. Consideration of these areas will be included in future documents.</p> <p>Comments regarding the car park at Birchwood are noted, although Warrington Borough Council are not responsible for the management of this car park.</p>
CSIO/178	Peter and Irene Sargeant	<p>6.1 Indicates that air quality improvements are not being maintained, which is a warning in itself. Where exactly are the two AQMAs referred to in 9.1 and why do they not feature in the Climate Change paper?</p> <p>A further curious omission is proper discussion of parking problems, including sheer lack of capacity, at stations like Glazebrook and Birchwood.</p> <p>It is possible that the regime has changed again; however, it got to a point where parking outside the limited station car park at Birchwood was impossible, if one wished to return late in the evening, because of gates being locked. It helps little that correspondence on the subject never gets answered.</p>	<p>Comments noted. It is acknowledged that Birchwood is a very important component of the forward supply of employment land in the borough that will continue to be supported. The strategic sites identified are those sites that are considered will be subject to significant change over the Core Strategy period. Whilst the role of Birchwood should be acknowledged and supported, it would not</p>
CSIO/188	Lewis Evans Turley Associates	<p>This section of the Core Strategy identifies a number of strategic sites which are shown diagrammatically at Figure 6.1. Despite the Core Strategy evidence base recognising Birchwood's importance, and by implication that of Birchwood Park, neither are identified as strategic sites and no reference made to their role. Whilst Birchwood Park is subject to a 10 year masterplan which has been partly implemented, its development and growth will continue through the Core Strategy plan period. It is, therefore, essential that the emerging Core Strategy supports its role within the Borough and as part of the wider Birchwood area, supporting its ongoing regeneration and the development of Birchwood Park.</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>It is our contention that the Core Strategy identifies a number of sites which are shown diagrammatically at Figure 6.1. Despite the Core Strategy evidence base recognising Birchwood's importance, and by implication that of Birchwood Park, neither are identified as strategic sites and no reference made to their role. Whilst Birchwood Park is subject to a 10 year masterplan which has been partly implemented, its development and growth will continue through the Core Strategy plan period. It is, therefore, essential that the emerging Core Strategy supports its role within the Borough and as part of the wider Birchwood area, supporting its ongoing regeneration and the development of Birchwood Park.</p> <p>It is our contention that the Core Strategy, as currently worded, would underly the current profile, role and historic success of Birchwood and Birchwood Park and will potentially hinder economic growth to the detriment of the stated objectives and vision underpinning the Strategy. MPEC, therefore, objects to the exclusion of Birchwood and Birchwood Park as 'Strategic Sites' and requests that they are included.</p>	<p>be appropriate to suggest a significantly different policy approach by identifying it as a strategic site.</p>
CSIO/51	Ms Samantha Turner Principal Planning Officer 4NW	<p>Figure 6.1: This is helpful in showing the key strategic sites picked out by Warrington and how they connect with the Strategic Route Network (i.e. the M6, M62 and M56).</p>	Comment noted.
Section 7: Higher Order Strategies			
CSIO/63	Mr David Hardman Asset Protection United Utilities	United Utilities Water plc are committed to working with the Mid Mersey Growth Point and the Environment Agency to enable the aspirations of the Growth Point by encouraging sustainable development.	Commitment noted.
CSIO/76	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning Cushman & Wakefield LLP	We support the scope for change as highlighted within the Core Strategy Issues and Options Paper and its assimilation with higher order strategies. The RSS specifically notes that future development within Warrington should focus on the regeneration of the older parts of the town. The visions, objectives and strategies outlined elsewhere within the Core Strategy Issues and Options Paper are in line with the aspirations of the RSS.	Support noted.
CSIO/259	Mr Simon Artiss Bellway Homes	Section 7 - again, the title of ' <i>Higher Order Strategies</i> ' could benefit from clarification. This Section appears to set out the strategic policy framework within which the Core Strategy sits;	Comment noted. This will be addressed in future documents.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/237	Janet Belfield Natural England	<p>Section 7 - Higher Order Strategies</p> <p>To accommodate growth there should be an equal growth in availability of green spaces for recreation. We would welcome the green belt being perceived positively rather than as a barrier to development. We would welcome strategic visions for the green belt to provide conservation and enhancement of landscape character and quality, conservation and enhancement of biodiversity and geodiversity; and recreation opportunities for people to enjoy access to the countryside and green spaces.</p>	<p>Comments noted. By recognising the Green Belt and constituent settlements as one of the building blocks of the Core Strategy a specific policy approach can be set out that will take into account the issues raised.</p>
Section 8: Current Situation of Warrington's Strategic Sites and Areas			
CSIO/28	Alan Hubbard National Trust	<p>SECTION EIGHT - Strategic Sites and Areas It is disappointing that the discussion of opportunities and potential in this section does not consider the wider asset base of these areas, including built and natural environment assets which can often be key features - for example in heritage led regeneration, and the potential to improve the image and attractiveness of the Borough by enhancing its river corridors and wider landscapes.</p>	<p>Comment noted. Future work will aim to reflect this.</p>
CSIO/64	Mr David Hardman Asset Protection United Utilities	<p>The Arpley Meadows proposed development has significant utility infrastructure issues and United Utilities should be involved in any proposals for this area.</p>	<p>Comment noted. Infrastructure planning is being undertaken to support development of the Core Strategy. This will involve United Utilities alongside other infrastructure providers.</p>
CSIO/78	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning Cushman & Wakefield LLP	<p>The Town Centre</p> <p>The town centre must remain the key focus for shopping, civic and cultural activities, food and drink and a significant number for jobs. Its continued success remains the key asset to the borough and as such needs to be enhanced through the Council's policies and management of developments. As such we consider it is important that the Council safeguard sites for mixed use development which can help promote and enhance the town centre.</p> <p>The masterplans, Area Action Plans and Supplementary Planning Documents which are being formulated to assist development on the fringe areas and regeneration areas must be tailored to address future demands and allow flexibility in their implementation.</p>	<p>Comments noted. The Town Centre has been identified as a key area which reflects comments set out here. The Core Strategy will help to achieve a positive plan based approach to town centre development based on available and up to date evidence. The 2006 Retail and Leisure study is being revised taking into account an up to date household survey. This evidence base will provide justification for the approach set out in the Core Strategy.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/120	Lisa Henderson Highways Agency	The Town Centre The Agency would support development located within Warrington Town Centre as it is unlikely that development in this location would significantly impact upon the SRN. However, should large-scale, trip generating developments come forward within the Town Centre; we may have to assess any potential impacts.	Support for development in the town centre noted alongside the need to assess potential impacts of large-scale, trip generating development.
CSIO/260	Mr Simon Artiss Bellway Homes	Section 8 - this is a helpful section and is well set out. Many of these areas/sites will be covered in the SHLAA in terms of their ability to deliver sufficient sites as required in the Core Strategy. Clearly the SHLAA will assess these areas/sites accordingly and is an important evidence source in confirming the future supply of new homes from these sources, and we will comment on the SHLAA accordingly. Some words of caution: the Core Strategy must realistically reflect economic conditions if it is to be deliverable in terms of outputs. It must therefore take a realistic position in respect to: planning commitments and their likely implementation; the apartment market and density (our experience is that sites will not yield the number of units previously envisaged); sale values and development costs (the former has dropped to a greater extent relative to the latter). The Core Strategy has to plan ahead but must also deal with these short term considerations;	Comments noted. The Strategic Housing Land Availability Assessment will reflect reality and viability in its assumptions as to if and when sites may come forward for housing development. The assumptions contained within the SHLAA will also be the subject of consultation to ensure they are appropriate.
CSIO/199	Mrs Jacqueline Johnson Cheshire Branch CPRE	Section 8 Current Situation for the countryside and its constituent settlements sections 8.11/12 Again there is no mention of the importance, support and promotion of locally grown food. 8.13 No need for a local exceptions policy as one already exists at national level.	Comments noted. National policy permits local exception policies to be included in LDDs - it is part of the Core Strategy debate to consider whether an exceptions policy is needed here in Warrington.
CSIO/265	Lisa Henderson Highways Agency	Omega Whilst the Omega site continues to be one of regional significance and importance, the Agency would continue to ensure that any development coming forward at this location comes forward in a sustainable manner. The Agency would ensure that connectivity to Warrington Town Centre and the surrounding residential areas by non-car modes is provided to reduce the need to travel by private car.	Comments regarding connectivity of the site to Warrington Town Centre and residential areas and the impact of the proposed development on the Strategic Road Network are noted. The Multi Modal Model for Warrington will be available to identify potential impacts of revised schemes in this location. This model is currently being finalised and tested.

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>The Agency has worked proactively and pragmatically with the developer of the Omega scheme to enable the development to gain planning permission. The Agency would continue with such an approach with any revised schemes in this location that would come forward at a similar scale and pace as the quantum of development currently consented.</p>	
CSIO/266	Lisa Henderson Highways Agency	<p>Older Parts of Warrington, otherwise termed the Regeneration Area</p> <p>The Agency would welcome development in older parts of Warrington, as they are built on previously developed land and should be accessible via public transport. This is in accordance with national and regional policy, but in addition should have minimal impact upon the operation of the SRN.</p>	<p>Support for development in older parts of Warrington on previously developed land noted.</p>
CSIO/267	Lisa Henderson Highways Agency	<p>Warrington Waterfront (Arpley Meadows / Bridgefoot / Bridge Street)</p> <p>The Agency would like to be involved at the earliest opportunity if these schemes were to come forward; as despite being located away from the SRN on the edge of Warrington Town Centre, a large trip generating development in this location could impact upon the SRN.</p>	<p>Request for involvement noted.</p>
CSIO/268	Lisa Henderson Highways Agency	<p>The Countryside and its Constituent Settlements</p> <p>Warrington is surrounded by the SRN on three sides and as such any development within the greenbelt land is likely to be close to the motorway network. As a consequence the Agency would discourage any development in such locations, especially as it goes against national and regional planning policy. Our policy does not encourage the location of sites in unsustainable locations.</p>	<p>Comments noted.</p>
CSIO/269	Lisa Henderson Highways Agency	<p>English Partnership Sites at Appleton Cross, Grappenhall Heys and Pewterspear</p> <p>Although these sites have already been determined through the planning process, if new development proposals are considered at these locations, the Agency would like to engage in pre-application discussions at the earliest opportunity.</p>	<p>Request for involvement noted. Decisions on the development of these sites will be taken in the context of the Core Strategy, and not on the basis of historic planning consents.</p>
CSIO/270	Lisa Henderson Highways Agency	<p>Peel Hall Farm</p>	<p>Comments and request for involvement noted.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		The site flanks the M62 and is located close to the SRN, although there is no direct access (the Agency policy dictates that no direct access from the SRN will be allowed to facilitate development sites). Notwithstanding this, if this site were to be developed, it is likely that in order to gain access to the site, access into the local road network close to Junction 9 of the M62 is likely. As such, we would like to become involved at the earliest opportunity in pre-application / master planning discussions if this site were brought forward for development purposes.	Comments regarding influencing travel behaviour noted.
CSIO/271	Lisa Henderson Highways Agency	Chapelford As this development is a brownfield site with good access to public transport infrastructure, the Agency would not comment upon the development proposals. However, we have looked into this site from an Influencing Travel Behaviour (ITB) perspective to try and identify smarter travel choices in the context of the impact upon the SRN. Should development come forward at this site, the ITB work may play a more prominent role in ensuring the site comes forward on a sustainable basis.	Comments regarding influencing travel behaviour noted.
CSIO/272	Lisa Henderson Highways Agency	The "Suburban" Areas of the Town The Agency would welcome the intentions of WBC to redevelop the older parts of Warrington where previously developed land is available and restrain suburban development, which may be closer to, and therefore may have an impact upon, the SRN.	Comments noted.
CSIO/238	Janet Belfield Natural England	Section 8 - Current Situation of Warrington's Strategic Sites and Areas We welcome inclusion of 'the countryside and its constituent settlements' within this section. We also agree that it has a role in the core strategy, i.e. value of the rural economy and provision of sites for formal and informal recreation. We welcome the core strategy managing pressures on the countryside to improve its character and appearance. We would add that this management should also benefit biodiversity, geodiversity and adaptation and mitigation of the effects of climate change. We note that some of the sites are brownfield sites, which often hold value for biodiversity. We request that this is considered in the strategy for developing these and other similar sites.	Comments noted. It is recognised that brownfield sites can hold value for biodiversity. Landscape character assessment work is currently being undertaken.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/222	Eng Klaus Armstrong-Braun	<p>We would welcome the use of landscape Character Assessment to set the framework for clear landscape based policies.</p> <p>To meet the requirements of the SEA and EIA directorates the Appleton Cross, Grappenhall Heys and Pewterspear need to go through the SEA and EIA Process</p> <p>Peel Hall Farm - this should be converted into either a wild life site woodland, ponds etc or an Agricultural extension so as to give clear use for the site</p> <p>Chapelford - this also needs going through the SEA and EIA process and should be reviewed possibly as a public amenity open space but better a new pocket park etc</p>	<p>Comments noted. If the Core Strategy intends to bring these sites forward, they will be subject to testing through Sustainability Appraisal and Strategic Environmental Assessment through that process.</p> <p>Suggestions for Peel Hall Farm are noted.</p> <p>Proposals for Chapelford emerging through the Core Strategy will similarly be subject to Sustainability Appraisal and Strategic Environmental Assessment.</p>
CSIO/99	Lauren Ashworth How Planning for United Utilities	<p>Omega - paragraph 8.4 refers to Omega as a strategic site and explains that the majority of its identified in the UDP as a Regional Investment Site for high quality strategic business developments. It also refers to a smaller part being granted outline permission in 2007 for a 3-phase business park development - this should be explicitly acknowledged as Lingley Mere Business Park.</p>	<p>Comments noted. Future documents will aim to reflect this.</p>
<p>Section 9: Assembling the Strategic Sites -</p> <p>Question 4 - Are there any other options that should be considered?</p> <p>Question 5 - Which option would be your preferred choice and why?</p>			
CSIO/108	Greater Manchester Geological Unit	<p>Both with regard to generating and evaluating options GMGU would ask for consideration to be given to ensuring that the operation of existing and future waste disposal and management sites is not compromised by other development proposals. Also, that existing minerals reserves are not sterilised by inappropriate development proposals.</p>	<p>Comments noted. Appropriate consideration will be given to the issues outlined.</p>
CSIO/114	Satnam Millennium Ltd	<p>A variation to Option 2 should be set out, which includes Peel Hall Farm within the housing allocations under that, medium-growth, scenario. This would allow for the necessary flexibility and locational choice/advantage which arises out of significant growth in North Warrington.</p>	<p>Comment noted.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/160	Sarah Jones Turley Associates	<ul style="list-style-type: none"> We support the recognition of the town centre as an area where development is to be promoted and prioritising development on inner Warrington brownfield sites. This is in line with national and regional planning policy aims. Options 1 and 2, in terms of the areas where development would be reviewed and potentially promoted, would be in line with national and regional planning policy aims. 	Support for Strategic Options 1 and 2 noted though this is premature at this stage of the process
CSIO/200	Mrs Jacqueline Johnson Cheshire Branch CPRE	Question 4. Are there any other options that could be considered? We have no suggestions.	Noted.
CSIO/228	Mr M Durrington Culcheth and Glazebury Parish Council	We know of none, but in reference to Section 8.13 we believe that there is no case for an exceptions policy to enable the provision of affordable housing on the edge of villages, in Green Belt locations, because this is already covered by National Policy.	Comment noted. National policy permits local exception policies to be included in Development Plan Documents - it is part of the Core Strategy debate to consider whether an exceptions policy is needed here in Warrington.
CSIO/149	Warrington & Co	Q4 - The Board agrees that the options are adequate in principle but need to be quantified in relation to their likely growth outcomes for Warrington.	Comment noted. The objectives will be reviewed and recast in light of consultation responses. This will help to identify likely outcomes in terms of growth.
CSIO/171	Louise Morrissey Peel Holdings	Without prejudice to Peel's position (stated below) in relation to the proposed Strategic Options, Peel would suggest that consideration be given to Option 4 which is summarised below:	<p>Suggestion of additional Strategic Option 4 noted. This suggestion will be considered in future documents.</p> <p>The future of the EP sites will be determined within the Core Strategy debate and not on the basis of historic planning consents.</p> <p>It is agreed that further reference needs to be made to the other settlements in the borough.</p> <p>The English Partnership sites all benefit from the equivalent of outline planning consent issued under section 7(1) of the New Towns Act 1981 which never time expire. These sites were identified for growth under a completely different planning regime and the extent to which they accord with RSS policy needs re-examination. Policy MCR6 requires plans and strategies to focus 'particularly on brownfield sites to ensure no further significant expansion onto open land' (bullet 2) and to 'support and diversify the rural economy and improve access to services in the rural areas focusing development in locations which accord with RDF2'. RDF2 requires local authorities to identify a 'subset of towns and villages as Key Service Centres' within which development will be of a 'scale and nature appropriate to fulfil the needs of local communities for housing, employment and services and to enhance the quality of rural life'. The EP sites do not accord with MCR6 or RDF2; outlying villages such as Culcheth and Lynn could reasonably be described as Key Service Centres however, and this bears further examination.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/7	Mr Derek Warren	<p>Strategic Option 3</p> <p>Is the better option as it would invite families with varying financial means. I would have considered that if the town is to grow as you suggest then families should be attracted to move to the affluent areas of W in addition to the developed brownfield sites.</p>	<p>Support for option 3 noted though this is premature at this stage of the process.</p>
CSIO/79	Winwick Quay LLP Mr Christopher Jones Head of Manchester Planning Cushman & Wakefield LLP	<p>We would promote the pursuance of Strategic Option 2. We feel this option provides the most appropriate level of restraint, taking into account the national and regional objectives in promoting inner Warrington brownfield development, whilst supporting it with a credible degree of flexibility to development opportunity and need.</p> <p>We feel that this strategic vision will allow Warrington as a borough to make the most of future investment opportunities.</p>	<p>Support for Strategic Option 2 noted though this is premature at this stage of the process.</p>
CSIO/115	Satnam Millenium Ltd	<p>Options 2 and 3, with Peel Hall Farm shown as a housing allocation, would be our preferred options. This is because the allocation of Peel Farm allows for the following opportunities:</p> <ul style="list-style-type: none"> (i) A continuity of housing supply within the town, irrespective of whether existing brownfield opportunities are available or viable over the forthcoming plan periods. (ii) It avoids an over-reliance on urban sites where infrastructure may not be provided as predicted on account of economic, environmental or other reasons. (iii) It provides a real opportunity for a wide range of affordable housing in a variety of styles and tenures at a critical point in the delivery cycle. (iv) An allocation at Peel Hall Farm provides the opportunity to bring forward large-scale benefits and improvements to North Warrington which would otherwise not be available. (v) A large land release in South Warrington would not be well-located to existing and proposed employment areas in central and North West Warrington. South Warrington is isolated from the town centre by limited river crossings. 	<p>Support for options 2 and 3 noted though this is premature at this stage of the process.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/201	Mrs Jacqueline Johnson Cheshire Branch CPRE	<p>Option 1 - prioritising development on inner Warrington brownfield sites- This is our preferred choice because:</p> <ol style="list-style-type: none"> 1. There is a greater probability of this option addressing the key issues- for example there would be employment opportunities near to the housing already built in the town centre. 2. This option is more likely to comply with the environmental and infrastructure constraints that exist. 3. In May, 2000, a consultation leaflet "Warrington's Way Ahead" went out to residents through free papers. This wide consultation culminated in the present UDP Option 1 is closest to it as are the aims of regeneration and affordable housing. 4. This option complies best with the spatial principles of the RSS. It will be the best at directing development and investment to the places where it can achieve the greatest public good and minimise any negative impacts. 	Support for Strategic Option 1 noted though this is premature at this stage of the process.
CSIO/229	Mr M Durrington Culcheth and Glazebury Parish Council	<p>Option 1 Because Option 1 follows more closely the Unitary Development Plan which was the result of wide consultation and a Public Inquiry.</p>	Support for Strategic Option 1 noted though this is premature at this stage of the process.
CSIO/150	Warrington & Co	<p>Q5 - The Board prefers an option that allows adequate growth potential commensurate with its agreed potential (please also refer to general comments above). In the absence of a means to quantify their likely outcomes, it is impossible to choose a specific option.</p>	Comment noted. Further work on refining options will allow more meaningful analysis.
CSIO/172	Louise Morrissey Peel Holdings	<p>3.4 Option 3 is Peel's preferred Strategic Option. 3.5 Option 3 will not prejudice the regeneration of brownfield sites within Inner Warrington. These sites will still be available for redevelopment and there will be no conflict with RSS policy MCR6 in this regard.</p> <p>3.6 The exclusive focus on brownfield sites in the Inner Area has not proven resilient to changes in the economy. Many such sites present considerable obstacles to delivery that reduce margins; changes in the local economy can swiftly render such schemes nonviable, e.g. the "Wireworks" scheme originally promoted by Modus.</p>	Support for Strategic Option 3 noted though this is premature at this stage of the process. RSS Policy MCR6 also states that the focus on brownfield sites is "to ensure no further significant expansion onto open land". A Stage 2 Strategic Flood Risk Assessment will examine the issue of sites within Inner Warrington that are at risk of flooding.

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>3.7 The Strategic Flood Risk Assessment (Jan 2008) identifies several significant sites within Inner Warrington that are at risk of flooding. Pursuing Options 1 and 2 would continue to focus development into areas that are at greater risk of flooding, contrary to guidance in PPS25. The more disaggregated approach put forward under Option 3 and Peel's Option 4 would mitigate this by allowing less vulnerable sites outside of the Inner Area to be brought forward.</p> <p>3.8 Peel believes that Option 3 presents the best opportunity to accommodate the predicted growth in households envisaged by DCLG's statistics. Development under Option 3 would be more responsive to market demands as there would be a wider scope of sites available unencumbered by abnormalities such as land contamination, flood risk attenuation etc. which would allow more rapid development (and thus contribution toward the supply of housing, both private and affordable).</p>	The Core Strategy housing figure will be guided by the RSS housing requirement and the new Growth Point figures.
CSIO/176	Peter and Irene Sargeant	<p>My general preference (Question 5) is for Strategic Option 1. However, i take issue with paragraphs 11.2-11.3. Detailed restatement of national policy, for its own sake, has often been frowned on; and rightly so, except where it would provide a clear benefit to the user. However, the Council is under an obligation to take account of national and regional policies. It is therefore sensible that it should seek to draw attention to them.</p> <p>The proliferation of policy instruments in constant flux, which is itself a curse (albeit dressed up as a benefit, in the form of a portfolio), requires that there should be a modicum of helpful cross-referencing. After all, we are fast moving to the position where only one geek understands what is going on and nobody actually quite knows who he (or she) is.</p> <p>One should also recognise that, to the extent UDPs and their forebears contained details, at least as much is now being produced, except that it is now in the form of SPDs.</p>	<p>Support for Strategic Option 1 noted though this is premature at this stage of the process.</p> <p>Appropriate reference will be made to national policy within the Core Strategy where this is considered helpful.</p> <p>It is acknowledged that there is potential for confusion now that the Local Development Framework constitutes a folder of documents, rather than the Unitary Development Plan, which was just one document.</p> <p>Cross-referencing will be included to other Development Plan Documents and Supplementary Planning Documents where this is considered helpful.</p>
CSIO/16	Laure Lane CBRE for client	We support Strategic Option 3: Promoting development on all suitable and available development sites. This is because it would provide for flexibility in delivering the Core Strategy, is a key requirement for the 'soundness' of Development Plan Documents in accordance with PPS 12.	Support for option 3 noted though this is premature at this stage of the process.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/22	Laurie Lane CBRE for United Utilities	We support Strategic Option 3: Promoting development on all suitable and available development sites. This option provides for flexibility in delivering the Core Strategy which is a key requirement for the 'soundness' of Development Plan Documents in accordance with PPS12.	Support for option 3 noted though this is premature at this stage of the process.
CSIO/29	Alan Hubbard National Trust	Question 5 - Having regard to the stance taken in adopted RSS, especially in respect of the Green Belt and the focus of development in existing main settlements it appears that Option 1 is much more in conformity than the other options.	Support for option 1 noted though this is premature at this stage of the process.
CSIO/52	Ms Samantha Turner Principal Planning Officer 4NW	<p>Strategic Option 1 - Development on inner Warrington brownfield sites: Concentration of development in the town centre implies that the sites should already be accessible by sustainable modes of travel. Warrington town centre does suffer from congestion issues already. By providing additional development here, it is possible that this could be made worse if additional traffic is attracted to the area. A strong strategy for promoting non-car transport modes will therefore be vital, so as to support the key issue of tackling congestion.</p> <p>Strategic Option 2 - as Option 1 with selected release of other sites: This option proposes to promote more suburban areas. It is important that these areas are accessible by sustainable modes and are not isolated and restricted to private car use.</p> <p>Strategic Option 3 - Development on all suitable/available sites: Each site would have to be addressed on its own merits however, any sites which would increase the need to travel may not be in line with RSS policy, unless they can be accessed sustainably.</p> <p>In all options, the Omega site is prioritised. Given its location on the M62, an already congested motorway, it will be important that the site does not create additional pressure on the Strategic Road Network.</p>	Comments noted.
CSIO/43	Phil Lally Government Office for the North West	1. This section starts by saying that the development of strategy options is a matter of assembling the strategic sites and their respective policy approached in different ways. It is the objectives, though, that should set out what the Core Strategy is aiming to achieve in spatial planning terms and the options should represent alternative ways of achieving the objectives. It is unclear as to whether this is the process that has been adopted given the above opening statement.	Noted. The more spatial approach that will be adopted to progress the Core Strategy will recognise this and look at more detailed options that are generated through objective setting.

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>2. Is it intended to allocate strategic sites in the Core Strategy. Also, is it proposed to include development management policies?</p>	<p>At the present time it is intended to identify strategic locations in the Core Strategy. It is also intended to include development management policies. The development of these will feature in future consultations.</p>
CSIO/140	Mr John Coxon Emery Planning Partnership	<p>Strategic sites and development options</p> <p>Questions 4 and 5 relate to the assembly of strategic sites, and their respective policy approaches. Broadly, we agree with Strategic Option 3. Development should be promoted on suitable and available sites within the borough. If Warrington is to rely too heavily on meeting its annual housing requirements through inner Warrington brownfield sites, it may be in a position to meet these numbers but not be able to fulfil the overall vision.</p> <p>However, an over reliance on these sites cannot meet the requirements for family housing, of which there is a recognised shortage at national and local level. We note that there is also no mention of a rural renaissance within the document.</p> <p>In Warrington, the Strategic Housing Market Assessment identifies that there is a clear need for two-bedroom, and in particular four-bedroom, owner-occupied and social-rent houses. The study also recognises that Warrington has house prices above the North-West average, and first time buyers struggle to get onto the housing market.</p> <p>Therefore we consider these issues need to be addressed through the Core Strategy. We believe that only though development outside of inner Warrington combined with some within, and in strategic locations through the release of greenfield / Green Belt land, can these requirements be met.</p> <p>Prejudicing the LDF process</p> <p>We note that 'Maintaining the Green Belt Beyond 2021' is identified as a key objective in the policy. Similarly, 'The countryside and its constituent settlements' are excluded from all development options in section 9. We do not question the principle of urban regeneration, and we acknowledge that the maintenance of the Green Belt is an objective of PPG2. We do however question the predetermined view that the Green Belt boundary is to remain.</p>	<p>Support for Strategic Option 3 noted but is premature at this stage of the process. An evidence based assessment of these issues will be undertaken at the next stage of the process.</p> <p>Comments regarding prejudicing the LDF processes are noted. However, the Regional Spatial Strategy states that there should be no strategic Green Belt boundary review in Warrington before 2021, which is the basis of the presumption that the Green Belt boundary will remain for of the life of the Core Strategy (which looks to 2026). The evidence collected for the Core Strategy will determine whether this is an appropriate assumption or whether smaller scale boundary changes need to be considered.</p> <p>RSS also places a clear focus on regeneration and seeks to protect open land from development.</p> <p>Comments regarding Section 106 agreements are noted.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>In essence prejudging the LDF process at this early stage is contrary to the purpose of this stage in the process, which should in our view consult on a wide range of possibilities, one of which would be Green Belt releases. Therefore the Preferred Options stage should include a broader range of options for consultation, with specific regard to the above.</p> <p>Conclusion</p> <p>There is clear statistical evidence of an upward trend in housing projections, which will heavily influence any future review of the RSS. We also have grave concerns over the deliverability of Warrington's current housing commitments. We therefore consider it essential that Warrington allocates land for housing either through the Core Strategy, or a specific Allocations' DPD.</p> <p>Meeting Warrington's future housing needs, and to match the ambitious vision set out in the core strategy, will require the allocation of land for family and affordable housing, in particular two-bedroom and four-bedroom properties. We propose that this cannot be met purely through previously developed land within inner Warrington, and consider that the council should consider promoting development outside of inner Warrington, including the strategic release of greenfield and Green Belt sites for housing.</p> <p>Other matters</p> <p>As part of the LDF process we would also ask that serious consideration be given to the way planning gain is dealt with. The inclusion of onerous off-site contributions as part of Section 106 agreements has been a known negative factor in the delivery of major sites not only in Warrington but elsewhere in the Northwest.</p>	<p>Support for a hybrid of options 2 and 3 noted, though this is premature at this stage. The issues raised will be addressed in the next stage of the process and decisions on a preferred option made in the light of the evidence base.</p>
CSIO/100	Lauren Ashworth How Planning	<p>Instead of selecting an option from the above, we suggest a new option is considered by the Council which comprises a hybrid of options 2 and 3. Development should be promoted within the town centre; Arpley Meadows/Bridgefoot; the Regeneration Areas; and suburban areas. However, areas where development would be reviewed and promoted should include Omega/Lingley Mere Business Park; and the two greenfield sites of Peel Hall Farm and English Partnership sites. Development should be restrained in the countryside and its settlements as per option 3.</p>	

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>This hybrid option should be promoted as the preferred option for the Core Strategy as it allows for the greatest degree of flexibility in terms of providing sufficient land to deliver housing and economic growth in line with the vision, whilst prioritising development on sustainable brownfield sites ahead of greenfield sites.</p> <p>In terms of housing, this option allows for suitable sites across the majority of Borough to be promoted for development, with the exception of the countryside and its constituent settlements. This is important for a number of reasons. Firstly, given the Borough is under pressure to deliver RSS housing targets alongside the Growth Point status which implies a higher level of housing provision, the Core Strategy must not seek to overly limit areas where housing development could be delivered. Furthermore, the principal aim of PPS3 is to provide a more responsive approach to land supply at the local level, and paragraph 3 in particular reflects the Government's commitment to improving the supply of housing in all communities.</p> <p>In terms of economic development, this option allows for flexibility with development in a broad range of locations across Warrington. This is essential to ensure sufficient sites are available to a range of businesses in various locations id the economic objectives and ultimately the vision are be delivered. Furthermore, with reference to PPS4 (paragraph 24) which is in draft form at present but sets out the Governments anticipated future direction of policy, Local Authorities are required to develop flexible policies that are able to respond to economic change.</p>	<p>Support for Strategic Options 2 and 3 noted.</p> <p>Gemini is a recognised retail park, but such retail floorspace is not promoted or protected by national Government Policy. It would therefore not be appropriate to include Gemini within the hierarchy of retail centre identified within the Development Plan.</p> <p>The capacity element of the Retail and Leisure study is currently being updated. This will identify whether further retail floorspace can be supported within Warrington Borough. If the evidence shows that further floorspace</p>
CSIO/129	CBRE for First Alliance Properties	<p>With regard to the Council's strategic options in assembling the strategic sites and their respective policy approaches, First Alliance Properties supports Strategic Option 2, where the Council will prioritise development on inner Warrington brownfield sites with selective release of other sites and Option 3, where the Council will promote development on all suitable and available development sites.</p> <p>First Alliance Properties recognises that Gemini Business and Retail Park is located within the 'Suburban' areas of the town, which is not traditionally promoted for commercial developments. However, the site is allocated as 'existing employment site' in the adopted UDP and it is located adjacent to large format retail stores such as Marks and Spencer, Ikea and Toys R Us. These retail sites are also allocated as 'existing employment site' in the adopted UDP.</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Gemini Business and Retail Park is widely seen as a retail park. This is recognised by the Economic Development Team of Warrington Borough Council, who state in their website, Warrington UK, that 'Gemini/Business Park is a mixed-use business park known <i>predominantly for its large retailers - Marks and Spencer and Ikea</i>'.</p> <p>The site is highly accessible and strategically located on the M62 between Junction 8 and 9, making it an ideal location for retail expansion in the area.</p>	<p>can be supported and evidence suggests that allocations may be necessary, these will be made in accordance with the sequential approach set out in Government guidance.</p> <p>Further expansion of Gemini may be appropriate, but only where justified by capacity, sequential and impact assessments.</p>
CS10/143	Nicola Sewell Indigo Planning Prudential Pensions Ltd	<p>Indigo supports Strategic Option 2 as it prioritises development in the central areas of the Borough where the CS10 objectives are best able to be met, whilst allowing development to be considered in other sustainable locations i.e. brownfield sites in accessible suburban locations (Gemini).</p> <p>This approach is consistent with national planning policy PPS1 and the adopted RSS for the North West, as set out below.</p> <p>National Policy</p> <p>Regenerating and making efficient use of previously developed land situated in accessible locations is compliant with the sustainability objectives of PPS1.</p> <p>PPS1 sets out the key principles of Central Government's Planning Policies, which reaffirms the role of the British Planning System in meeting the needs of a growing and competitive economy, and in providing for new development without harm to the natural and built environment. It states that one of the key roles of planning policy is to foster economic development and investment, which is consistent with the principles of sustainable development</p> <p>PPS1 seeks to restrain the use of natural resources, through maximising development opportunities. It states that:</p> <p>"The broad aim should be to ensure that outputs are maximised whilst resources used are minimised...."</p> <p>(paragraph 21 of PPS1)</p>	<p>Support for Strategic Option 2 noted though this is premature at this stage of the process.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>The minimisation of the need to consume new resources can be achieved by maximising the efficient use and reuse of existing brownfield sites: ".....rather than making new demands on the environment....."</p> <p>(paragraph 22 of PPS1).</p> <p>PPS1 is concerned with delivering sustainable development, and establishes 10 key principles as part of the "</p> <p>General Approach</p> <p>" to sustainable development</p> <p>(set out in paragraph 27 of PPS1). It is of note that the key principles includes urban regeneration (General Approach Number ii), Development in Appropriate locations (General Approach Number iv); and Provide Improved Access for All (General Approach Number C), which states: "Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space....by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car" (paragraph 27v of PPS1).</p> <p>Consequently, the Core Strategy needs to prioritise development on previously developed sites in highly accessible locations and make efficient use of land for example, by intensifying the use of existing retail facilities.</p> <p>Regional Policy</p> <p>Strategic Option 2 is also consistent with the RSS Policy MCR6, which sets out the strategic framework for Warrington and states that plans and strategies should amongst other matters should: "Support sustainable economic growth in Warrington and its role as a source of employment for that area including Warrington, Knowsley, Halton, St Helens and Wigan; Focus development on sites which are accessible by public transport, walking and cycling and accord with policy RDF1, the spatial principles (Policies DP1 to 9), Policies W2 and W2 and MRCR1, focusing particularly on brownfield sites to ensure no further significant expansion onto open land; and Support regeneration and restructuring of the older urban areas."</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Clearly, Strategic Option 2 is consistent with the above matters particularly in relation to supporting sustainable economic growth and focusing development on sites which are accessible, and brownfield, as well as supporting regeneration and restructuring of urban areas.</p> <p>Summary</p> <p>In summary, we request that the positive role and function of existing retail parks are recognised in the economic objectives summarised at Section 5 of the CS10, linked to their complimentary relationship within the established shopping centres highlighted, and their benefit to the local economy.</p> <p>Indigo support Strategic Option 2 in relation to inner Warrington brownfield sites with selective release of other sites, as it prioritises development in the central area of the Borough where the CS10 objectives are best able to be met, whilst allowing development in other sustainable locations.</p> <p>The most important factor which needs to be taken into account in relation to the location of new development should be the redevelopment of previously developed land situated within accessible, sustainable locations.</p>	<p>Support for Strategic Options 2 and 3 noted.</p> <p>Gemini is a recognised retail park, but such retail floorspace is not promoted or protected by national Government Policy. It would therefore not be appropriate to include Gemini within the hierarchy of retail centre identified within the Development Plan.</p> <p>The capacity element of the Retail and Leisure study is currently being updated. This will identify whether further retail floorspace can be supported within Warrington Borough. If the evidence shows that further floorspace</p>
CS10/82	Jasmine So Planner CBRE for First Alliance Properties	<p>With regard to the Council's strategic options in assembling the strategic sites and their respective policy approaches, First Alliance Properties supports Strategic Option 2, where the Council will prioritise development on inner Warrington brownfield sites with selective release of other sites and Option 3, where the Council will promote development on all suitable and available development sites.</p> <p>First Alliance Properties recognises that Gemini Business and Retail Park is located within the 'Suburban' areas of the town, which is not traditionally promoted for commercial developments. However, the site is allocated as 'existing employment site' in the adopted UDP and it is located adjacent to large format retail stores such as Marks and Spencer, IKEA and Toys R Us. These retail sites are also allocated as 'existing employment site' in the adopted UDP.</p>	

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ID	Name and Organisation	General Comments	WBC Officer Comments
	Gemini Business and Retail Park is widely seen as a retail park. This is recognised by the Economic Development Team of Warrington Borough Council, who state in their website, Warrington UK, that 'Gemini Business Park is a mixed-use business park known predominantly for its large retailers - Marks and Spencer and Ikea.'	The addition of further large format retail floorspace within the Park will assist in stemming identified leakage from the borough. This will in turn reduce the need for shoppers to travel beyond the borough for comparison goods, something which is currently considered unsustainable. There will be benefits in grouping retail floorspace as more linked trips can be made and number of trips by car will be minimised outside the town centre. This is particularly relevant in Gemini Business and Retail Park as it is a well-established and popular retail location in Warrington.	can be supported and evidence suggests that allocations may be necessary, these will be made in accordance with the sequential approach set out in Government guidance. Further expansion of Gemini may be appropriate, but only where justified by capacity, sequential and impact assessments.
CSIO/86	Dennis Smith Trafford Council	<u>Strategic Option</u> Trafford is supportive of Option 1 which prioritises development in inner Warrington brownfield sites. This would be in line with RSS policy MCR 6, which details development should focus on brownfield sites to ensure no further significant expansion on to open land. This will focus development in sustainable locations and increase the opportunities for public transport usage and improve local employment opportunities minimising out-commuting to Greater Manchester and the Regional Centre. <u>Strategic Sites and Areas diagram</u> This diagram or the spatial options do not clearly state the future role Culcheth and Lymm will play in new developments of both housing and employment.	Support for option 1 noted though this is premature at this stage of the process. The future role of Culcheth and Lymm will be set out clearly in future Core Strategy documents.
CSIO/261	Mr Simon Artiss Bellway Homes	Section 9 - we support the identification of Strategic Sites through the Core Strategy. Such sites must be robustly assessed in accordance with SHLAA Guidance. We do not consider that Strategic Option 1 will deliver the new homes needed; it would constrain development and should not be pursued (for the reasons stated in 13 above). Equally, Option 2 may be too constrained, given the state of the market. We therefore support Option 3. Would Peel Hall Farm fall to be considered as a suitable and available site? The criteria under Option 3 needs to be made clear;	Support for Strategic Option 3 noted. An assessment of whether Peel Hall Farm is considered to be suitable and available will come through the Strategic Housing Land Availability Assessment. Details of the strategic options will emerge through continuing work on their refinement. This will be the subject of future consultation.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/239	Janet Belfield Natural England	Section 9 - Assembling the Strategic Sites At this stage we have no desire to promote one option over another.	Comment noted.
CSIO/182	Stephen Brown Environment Agency	In section 9, we note that all 3 strategic options include Arpley Meadows/Bridgefoot (the waterfront) as areas where development would be promoted. We consider it appropriate to add in the proceeding section 'Current Situation of Warrington's Strategic Sites and Areas' that Warrington's Strategic Flood Risk Assessment (SFRRA), January 2008 forms part of the Core Strategy evidence base outlines that the 'Sequential Test' would need to be satisfied where development is proposed in Flood Zones 2 and 3. The sequential test aims to ensure there are no reasonably available alternative sites of lower flood risk where development should be located.	Large parts of Arpley Meadows are in Flood Zone 1. It is, however, acknowledged that parts of the area are in Flood Zones 2 and 3 and the sequential test will therefore need to be addressed if the site is promoted for development through the Core Strategy. Emergency access and egress will also be an issue in the area as it is surrounded by areas at risk from flooding in Flood Zone 3. Future documents will make reference to the flooding issues in the area.
CSIO/195	Chris Findley Salford City Council	It is noted that the Issues and Options Report assembles its strategic sites into 3 possible options; prioritising development on inner Warrington brownfield sites; prioritising development on Inner Warrington brownfield sites with selective release of other sites; and promoting development on all suitable and available development would be 'reviewed and promoted'. The opportunity to revisit the development strategy for Omega is particularly supported. The scale of office development permitted is considered to be excessive given the location and nature of the site, and the city council would support a more mixed approach to the remainder of Omega, focused on the development of manufacturing and warehousing. The Core Strategy should provide clarity with regard to the scale, phasing and nature of the development on the operation of the M62, and the need to ensure consistency with national and regional planning policy. Notwithstanding the fact that phases 1 and 2 have outline planning permission, the development of the remainder of the site will need to be consistent with Regional Spatial Strategy Policy W2 and Planning Policy Statement 6. The borough council will need to take into account work currently being undertaken by the North West Regional Development Agency to review strategic sites, which will feed into the development of the Regional Strategy. The Strategic Sites Review Technical report (February 2009) proposes that the emphasis for Omega should be for manufacturing and process industry.	Support for revisiting the development strategy for Omega is noted. Concerns regarding Strategic Option 3 and conflict with RSS Policy MCR6 are noted. Salford City Council has concerns regarding the proposed Strategic Option 3, which promotes development on all suitable and available sites. In the regional context, the strategic framework for Warrington is provided through Regional Spatial Strategy RSS Policy MCR6, which explains that the focus for development should be on brownfield sites, to ensure no further expansion

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>onto open land. Strategic Option 3 promotes development at Peel Hall Farm, a greenfield site. This presents conflict with RSS Policy MRC6, and could also have an impact on the efficient operation of the M62.</p>	<p>Comments noted. Birchwood forms a key element in the established forward supply of opportunities for economic development in the borough and as such support for its continued development is not at issue.</p>
CSIO/189	Lewis Evans Turley Associates	<p>This section outlines three options for the approach to locating development within the Borough with the strategy sites identified being placed into one of three categories;</p> <ul style="list-style-type: none"> ● Areas where development would be promoted; ● Areas where development would be reviewed and promoted; and ● Areas where development would be restrained <p>As a consequence of the omission of Birchwood/Birchwood Park this area is not categorised. However, it is MEPC's view that Birchwood would most appropriately fall within the first category. If this is the case, any of the Strategic Options would be acceptable. However, any approach which would restrain Birchwood Park's growth is unacceptable and MEPC reserves the right to object in the future if future drafts of the Core Strategy sought to do so.</p>	<p>Comments and support for Strategic Options 1 and 2 noted though this is premature at this stage.</p>
CSIO/55	Ms Samantha Turner Principal Planning Officer 4NW	<p>In summary, all of the 3 strategic options concentrate development on Warrington in line with RDP1 and MCR6. However options 1 and 2 are more likely to be in line with RSS policies including MCR6 which states that development in Warrington should focus on sites accessible by public transport, walking and cycling, and should focus particularly on brownfield sites to ensure no further significant expansion onto open land. Development of the suburban greenfield sites such e.g. the EP sites and Peel Hall Farm, especially earlier in the Strategy period, could prejudice regeneration in inner Warrington and also mean that the 80% brownfield target for housing may not be met.</p>	<p>Comments and support for Strategic Options 1 and 2 noted though this is premature at this stage.</p>
CSIO/44	Phil Lally Government Office for the North West	<ol style="list-style-type: none"> 1. Until further work has been done to develop the key issues, vision and objectives as set out above it is difficult to comment on the options. 2. As we indicated previously, the options seem to relate to the development of alternative strategic sites which seems to be rather limited in terms of the range of issues facing the borough. The classification of the countryside as a strategic site seems a little odd and you may wish to give some further thought to this. Because the options have been insufficiently developed it will be difficult to carry out an initial sustainability appraisal. All of this will make it difficult to move from this initial consultation to further consultation on a preferred option without having to do further work developing, appraising and consulting on the options. 	<p>Noted. Further work to develop options is underway.</p> <p>A further consultation will be undertaken on refined options before further assessment and selection of a preferred option.</p>

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/121	Lisa Henderson Highways Agency	<p>Strategic Options</p> <p>Upon reading the options the Agency has come to the following conclusions, Option 1 has a more defined focus of development land with the existing urban core and on previously developed land, where as Options 2 and 3 include some sites which are not as well connected to existing public transport links and core services, and which are located closer to the SRN. However, until further information is forthcoming regarding the number of sites / development quantum coming forward under each option, we would not be able to make a decisive comment to encourage or discourage any of the spatial options at this point.</p> <p>In summary the Agency supports policies that aim to locate development within established urban areas where there are good public transport links and networks. The Agency would also support policies that will see brownfield and windfall sites developed within town and local centres where good links to services and opportunities already exist, therefore by reducing the need to travel by private car.</p> <p>Notwithstanding the comments made regarding the specific strategic options, the Agency may still need to comment on planning applications should it be decided that a proposed development could have an impact upon the operation of the SRN.</p> <p>As we have mention there is lack of detailed transport impact information provided regarding land allocations and development quantum within this document, therefore the Agency is unable to comment on any of the Spatial Options proposed at this point. Further information is required by the Agency to be able to advise on the preparation, production and submission of a robust transport related evidence base.</p> <p>However, you maybe aware that to overcome this we are working with Warrington Borough Council in building the evidence base require for your preferred options through the building and use of the Warrington multi modal model. Once completed in the next few months, the model will provide the tool to decide which of the three Spatial Options would be best to take forward from a transport impact viewpoint. The model should therefore assist in providing a robust evidence base with the travel implication and impacts suitably identified and mitigation measures agreed on a cumulatively basis where necessary. This will help to form a coherent infrastructure plan for Warrington.</p> <p>The Strategic Options presented have allowed an understanding and appreciation of the spatial issues which will potentially shape development within the Borough through to at least 2026.</p>	Comments regarding options and the multi modal transport model noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/169	Louise Morrissey Peel Holdings	<p>Peel agrees that subject to the observations below, the framework for assessing the Strategic Options advanced in section 9 of the CSOIR is appropriate.</p> <p>Infrastructure</p> <p>2.9 As acknowledged in [10.10] of the CSOIR paragraph 4.8 of PPS12 (June 2008) unequivocally states that:</p> <p>2.10 By the Council's own estimate evidence relating to Utilities infrastructure, Social infrastructure and Transport infrastructure is only expected to become available in mid part of this year, by which time the initial consultation on the CSOIR will have been concluded. Any slippage in the provision of such critical evidence has the potential to undermine the delivery of the Core Strategy.</p> <p>2.11 Notwithstanding the above Peel would again draw attention to the significance of the Manchester Ship Canal both in the context of Utility infrastructure and Transport infrastructure. In the case of the former the Canal can function as a major receptor of surface water run off, a fact acknowledged in the Strategic Flood Risk Assessment (Jan 2008). In the case of the latter the Canal, when combined with the development of adjacent land, has the capacity to deliver a modal shift in freight distribution traffic that would demonstrably benefit Warrington.</p>	<p>Conditional support noted.</p> <p>As is suggested, infrastructure planning is being undertaken as part of the Core Strategy production process. It is recognised that it is essential that the conclusions of the infrastructure planning process feed into consideration of the Core Strategy issues and options.</p>
CSIO/219	Eng Klaus Armstrong-Braun	<p>No.1 option:</p> <ul style="list-style-type: none"> • Sustainable • Keeps communities together • Focuses regeneration of central and run down areas • Reduces climate change and Warrington's carbon footprint. People can walk, cycle, bus to required places. • If done correctly can make Warrington a "living city" as Santander, Hannover, and Hamlin. Good design in all aspects will improve quality of life of urban areas. 	<p>Support for Strategic Option 1 noted though this is premature at this stage of the process.</p>

Section 10: Assessing the Options - How do we decide which one is right for Warrington?
Question 6 - have we set out an appropriate basis for assessing development options?

CSIO/65	Mr David Hardman Asset Protection United Utilities	It is very important to coordinate plans for development with the availability of utility infrastructure and good planning liaison is essential.	Comment noted. Infrastructure planning is being undertaken to support the development of the Core Strategy.
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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/101	Lauren Ashworth How Planning for United Utilities	Chapter 10 of the report identifies a clear and appropriate basis for assessing the development options.	Support noted.
CSIO/109	Greater Manchester Geological Unit	Given the issues raised above minerals Minerals Policy Statement 1: Planning and Minerals should also be included in the range of national policies that are particularly relevant to the core strategy. MPS1 sets out the Government's objectives in terms of minerals planning and are not restricted to identifying sites for the extraction of primary minerals but extend to, for example, the use of recycled materials, sustainable transport of minerals and safeguarding of mineral resources.	Comment noted. Minerals Policy Statement 1 will be included in future documents that refer to national policies. A Minerals Study is being carried out to provide evidence for the Core Strategy process.
CSIO/116	Satnam Millenium Ltd	Whilst we agree with the basis for assessing the various development options as set out, there also needs to be a thorough analysis on the basis of: (i) Certainty for Growth. (ii) Improvements in the existing Inner Areas of Warrington. (iii) The availability and viability of existing urban sites. (iv) The availability and viability of infrastructure to provide for new urban sites. (v) The reliable provision of affordable housing.	Comments noted. All of these issues will be considered in constructing and assessing options and deciding on a preferred option.
CSIO/117	Satnam Millenium Ltd	Broadly, we agree with the approach as set out.	Broad agreement noted.
CSIO/161	Mrs Sarah Jones Turley Associates	Question 6 - Assessing Development Options • We are pleased to be involved in the LDF process. We would be grateful to be made aware of future stages of the process and would be willing to be specifically consulted/meet with Borough Council officers to discuss town centre issues in more detail if this would be of assistance.	Offer of additional consultation / meetings noted.
CSIO/202	Mrs Jacqueline Johnson Cheshire Branch CPRE	Yes, this is a comprehensive list.	Support noted.

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/230	Mr M Durrington Culcheth and Glazebury Parish Council	Yes, as far as we can see but it is difficult for us to assess this.	Support and comment noted.
CSIO/151	Warrington & Co	Q6 - The Board believes that there needs to be a quantitative assessment of economic and population outcomes of the options, in relation to the regional role and defined growth ambitions of the town. These outcomes may be implicit in some of the other suggested assessment vehicles but need to be made explicit in their own right.	The quantitative assessment of economic and population outcomes of the options will be undertaken in due course and will be the subject of further consultation.
CSIO/30	Alan Hubbard National Trust	Para 10.19 should also include reference to PPG16: Archaeology. The full Sustainability Appraisal will need to consider a very wide range of relevant documents in setting the context and direction for the assessment of the Core Strategy Policies. This will obviously run in parallel with the preparation of the Core Strategy but will need to encompass such diverse contextual documents as DEFRA's Soil Action Plan and English Heritage's series of Heritage Counts documents (including their Regional datasets).	Comment noted. Future documents will aim to reflect this.
CSIO/262	Mr Simon Artiss Bellway Homes	Section 10 - your assessment is limited to sustainability appraisal and infrastructure capacity along with impact upon neighbourhoods. These accord with broad policy themes but miss out important monitoring of outputs. An assessment of Options should therefore include such considerations as: which delivers the new homes required, including affordable; which supports the economic growth strategy; which provides most job opportunities;	Comments noted. These considerations will also be part of the assessment of options and the decision of which is the preferred option. Future documents will reflect this.
CSIO/240	Janet Belfield Natural England	Section 10 - Assessing the Options We welcome acknowledgement that the Sustainability Appraisal and Habitat Regulations Assessment screening will be used as a tool to assess the options. It may be necessary to assess potential impacts upon sites outside the borough as well as within as there may be pathways with other sites beyond the borough itself. We welcome inclusion of green infrastructure in context with the Core Strategy term 'infrastructure'. We ask that you also make it clear that this includes green spaces used for recreation and not limit it to formal parks and gardens. Previously in the report canal corridors were included with river corridors and we assume that this is the case here, (paragraphs 10.9 - 10.11).	The Habitat Regulations Screening will include sites outside of the Borough where there are linkages and will assess potential impacts upon them. The definition of green infrastructure can be found in the background paper and will be examined in more detail in the upcoming Infrastructure Capacity Assessment document, which will be the subject of consultation.

Issues and Options Report Schedule

ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/194	Chris Findley Salford City Council	The Issues and Options Report explains that it will consider the impact of the strategy on existing neighbourhoods, in determining which option to take forward. It is considered useful to also consider the impact on and links to strategies being produced in adjoining authorities such as Salford.	Comments noted. The impact of different strategies and links to strategies being produced in adjoining areas will be an important consideration in determining which option to take forward.
CSIO/220	Eng Klaus Armstrong-Braun	Yes	Support noted.
CSIO/11	Mr Derek Warren	<p>Section 11: Development Management Policies - Question 7 - Is this the correct approach to development management policies?</p> <p>The Chelford Development that has been built on a virtual virgin site giving developers, planners and highways consultants and managers the opportunity to apply the principles noted in 11.5</p> <p>I quote</p> <p><i>providing for safe walking and cycling, including where appropriate secure cycle parking and changing facilities; and</i></p> <p><i>an appropriate approach to the provision and management of car parking;</i></p> <p>What has been the result?</p> <p>Insufficient car parking.</p> <p>These flats and houses are owned by Professionals with a company car each; or, a family of 4 with 2 grown up children will have 4 car. What is the result? The cars are parked on the road in the cycle lanes thus making the children using the cycle lanes continually go into the main road, (that is wide open and straight perfect for speeding!!!)</p> <p>With regards to cycle lanes, the planners have made a joint Bus and cycle lane. It is beyond comprehension. Do the planners never ride a bike? Can you imagine the slip stream from a bus at 30 mph on a child on a bike?</p> <p>Why were the cycle lanes not fenced off as a separate lane. There was all that open land but everything is squeezed in. Terrible.</p>	Comments regarding car parking and design are noted.

Issues and Options Report Schedule

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>High Quality Design (11.6)</p> <p><i>I quote</i></p> <p><i>are visually attractive as a result of good architecture and appropriate landscaping;</i></p> <p>With reference to Cheshire. The terraced houses are already showing signs of age with green mould on some stone window cills.</p> <p>The landscaping? What landscaping? A few bushes here and there and a pond in a field. Its just acres of Tarmac! Please go and look at the pond opposite the Thatched Cottage. It is full of rubbish., broken fences and litter. The citizens in general have no confidence that the planners will be directed appropriately nor will WBC ensure that the areas are kept clean and tidy. This estate was the pride and joy of this area a few years ago.</p>	
CSIO/17	Laurie Lane CBRE on behalf of client	We support the approach outlined for the proposed Development Management Policies; however, it we think it would also be worth including as an additional bullet point, "apply a flexible approach, which is sensitive to market conditions". This approach would enable high quality development to come forward without being comprised by viability issues. This is particularly relevant where market conditions make it more difficult to deal with common issues such as remediation, affordable housing and section 106 contributions.	Support and comments noted.
CSIO/23	Laurie Lane CBRE on behalf of United Utilities	We support the approach outlined for the proposed Development Management Policies; however, we think it would also be worth including as an additional bullet point, "apply a flexible approach, which is sensitive to market conditions". This approach would enable high quality development to come forward without being comprised by viability issues. This is particularly relevant where market conditions make it more difficult to deal with common issues such as remediation, affordable housing and Section 106 contributions.	Support and comments noted.
CSIO/31	Alan Hubbard National Trust	Question 7 - In most respect the approach is agreed. However, a more explicit approach to the understanding and reinforcement of landscape character should be set out; and the objectives for biodiversity are too low key - a more explicit stance relating to the protection and enhancement of existing resources and the creation of new resources (especially linking existing important habitats) will be required in order to be in conformity with adopted RSS.	Comments noted. Future documents will aim to address concerns over landscape character and biodiversity.
CSIO/130	CBRE On behalf of First Alliance Properties	<p>2.1 First Alliance Properties supports paragraph 11.4:</p> <p>2.2 "It is proposed that development management policies in the Warrington Core Strategy will focus on the delivery of:</p>	Support noted.

Issues and Options Report Schedule

ID	Name and Organisation	General Comments	WBC Officer Comments
		<ul style="list-style-type: none"> - sustainable development, with a particular emphasis on climate change considerations; and - high quality design, <p><i>and will set the context for the negotiation of planning obligations.</i></p> <p>2.3 First Alliance Properties is fully committed to delivering sustainable development which will comply with the guidelines set out by the Council. Any future new development within the site will consider the extent to which the proposed massing of buildings, density and mix of development helps to minimise energy consumption. In addition, it will optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. First Alliance Properties welcomes the Council's requirements on sustainable development and high quality design.</p>	
CSIO/83	Jasmine So Planner CBRE for First Alliance Properties	<p>First Alliance Properties supports paragraph 11.4:</p> <p><i>"It is proposed that development management policies in the Warrington Core Strategy will focus on the delivery of:</i></p> <ul style="list-style-type: none"> - sustainable development, with a particular emphasis on climate change considerations; and - high quality design, <p><i>and will set the context for the negotiation of planning obligations."</i></p> <p>First Alliance Properties is fully committed to delivering sustainable development which will comply with the guidelines set by the Council. Any future new development within the site will consider the extent to which the proposed massing of buildings, density and mix of development helps to minimise energy consumption. In addition, it will optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. First Alliance Properties welcomes the Council's requirements on sustainable development and high quality design.</p>	Support noted.
CSIO/263	Mr Simon Artiss Bellway Homes	Section 11 - we seek Development Management Policies that accord with national policy and RSS and which are precise. We seek to avoid overly prescriptive policies and support a negotiated approach based upon the merits of each site/application, especially in terms of on-site requirements (design/energy/Code, etc) and any off-site benefits (S.106), as these	Comments noted.

Issues and Options Report Schedule

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/183	Stephen Brown Environment Agency	need to be factored in at the earliest opportunity. These considerations can seriously impact upon viability and therefore delivery of development and policies must have due regard to their impact.	Comments noted.
CSIO/66	Mr David Hardman Asset Protection United Utilities	<p>Within sustainable development the provision for sustainable waste management has been identified and this can be assisted by using the statements on new development design/layout to include consideration for the storage and/or collection of recyclable wastes at residential and commercial premises. Such provision can assist the borough in achieving its own targets and those set out within the RSS (Policy EM10).</p> <p>United Utilities Water plc agrees with most of this section, however in relation to the words "pay attention to the potential contribution to be gained to water harvesting from impermeable surfaces and encourage layouts that accommodate waste water recycling";</p> <p>Please also note that United Utilities recognises that there is a lot of interest in grey water recycling and/or rainwater harvesting. However, a lot of research studies have been undertaken, which have demonstrated that they are currently expensive to install and to maintain, often use significant amounts of energy (increasing carbon emissions) and have public health concerns. Therefore, before seeking to require developers to implement these systems, you should be aware that acceptable and sustainable use of such systems has not been proved and so United Utilities cannot endorse their use at present.</p>	Comments noted.
CSIO/67	Mr David Hardman Asset Protection United Utilities	United Utilities agrees that the Council should promote prudent use of natural resources. Our particular interest is drinking water supply and water saving should be promoted in new and existing development.	Agreement and comments noted.
CSIO/68	Mr David Hardman Asset Protection United Utilities	You may wish to add reference to mitigation against flood risk as part of your sustainable approach to development?	Noted. Reference will be made to mitigation against flood risk in future documents.
CSIO/110	Greater Manchester Geological Unit	GMGU broadly agree with the approach taken to development management policies. The sustainable development section refers to the requirement for sustainable waste management. Key considerations include the impacts of waste development, minimising waste during development, restoration and aftercare	Broad agreement noted. Further issues relating to sustainable waste management also noted.
CSIO/162	Sarah Jones Turley Associates	The areas identified for demand management policies are generally endorsed.	General endorsement noted.

Issues and Options Report Schedule

ID	Name and Organisation	General Comments	WBC Officer Comments
		The consideration as to whether a significant proportion of energy supply generation can be from on-site or renewable provision should recognise the economic impact of such requirements to the deliverability of development schemes and the practicalities of such generation in a town centre.	Issues of viability of energy supply generation will be addressed as part of a renewable energy study being progressed with the other Mid Mersey Growth Point authorities.
CSIO/203	Mrs Jacqueline Johnson Cheshire Branch CPRE	<p>Yes, if these are the considerations when development is possible within the constraints of environment and infrastructure.</p> <p>It could be improved by adding "Ensuring opportunities are identified and taken to improve the quantity and quality of public realm and green infrastructures- especially to create new wildlife corridors linking existing habitats - and to incorporate innovative features such as green roofs".</p> <p>(this ties in with the existing recognition of the importance of water and energy efficiency).</p> <p>Also refer to sustainable construction techniques.</p>	Support and comments regarding sustainable construction and green infrastructure are noted. These will be reflected in future documents.
CSIO/231	Mr M Durrington Culcheth and Glazebury Parish Council	The statement needs personalising into neighbourhoods/parishes	Comment noted. Future documents will take a more spatial approach setting out particular policy approaches for certain areas, but there will be a need for some development management policies that cover the whole borough.
CSIO/152	Warrington & Co	The Board believes that the suggested Development Management policies are adequate.	Comment noted.
CSIO/241	Janet Belfield Natural England	<p>We agree that core strategy policy should not repeat national and regional policy. However, we would welcome strategic policies that add a local dimension and clearly meet a policy need for Warrington. We acknowledge and agree that there is a necessity for this policy direction to commit to the principles of sustainable development and high quality design.</p> <p>We note the list in paragraph 11.5, but ask that the list is reviewed to ensure that they can all be written positively, for example, 'ensure new development conserves and enhances local character and quality and makes a positive contribution to the conservation and enhancement of biodiversity and geodiversity'. We also consider that open space can deliver far more than just shelter and shade and this should be broadened.</p>	Comments noted.

Issues and Options Report Schedule

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/170	Louise Morrissey Peel Holdings	<p>2.12 In general Peel supports the stated intention that the development management policies shall focus on achieving sustainable developments that exhibit high quality design, but these aspirations do not appear to be clearly reflected in the Vision for the borough as set out in section 4 of the CSOIR. There needs to be a clearer and more explicit link between the Vision and the development management policies in the Core Strategy.</p> <p>2.13 Peel would also caution that should the Core Strategy development management policies be constructed in such a way as to place too great an emphasis on climate change considerations (e.g. by requiring housing developments to always achieve specific Code Level ratings, to always incorporate sustainable drainage systems etc. irrespective of scale) it may act as a constraint on delivery. With this in mind Peel would suggest that the policy imperatives listed under [11.5] of the CSOIR will need to be framed and expressed very carefully.</p> <p>2.14 Peel is also of the view that many of the policy imperatives set out under [11.5] appear to be very general. Advice provided by the Planning Advisory Service and the Department for Communities and Local Government in the <i>Plan Making Manual</i> states that:</p> <p>Core Strategies should not contain bland general policies that are little more than public relations statements such as the following example: 'Housing development must contribute to the creation of sustainable and mixed communities. Proposals must provide housing types and tenures that address local housing needs'.</p> <p>Peel would therefore urge that the policy imperatives listed under [11.5] be refined and made much more specific to reflect the Vision for the borough, the Objectives of the Core Strategy (taking full account of all assessments of infrastructure) and the selected Strategic Option.</p>	<p>Support for high quality design noted.</p> <p>Comments regarding the link between the vision and the development management policies noted.</p> <p>Comments regarding delivery noted. The Core Strategy will need to consider the necessary balance between achieving sustainable design and construction with viability of development.</p> <p>Comments regarding the generality of the policy imperatives are noted. Future documents and consultations will refine the current approach and will be more specific and reflective of the vision, objectives and preferred strategic option.</p>
CSIO/221	Eng Klaus Armstrong-Braun	Yes	Support noted.
Section 12: Next Steps			Comment noted and agreed.
CSIO/204	Mrs Jacqueline Johnson Cheshire Branch CPRE	12.3 refers to further consultation with stakeholders This is important, particularly with respect to the Area Background Papers where local input is essential.	

3 Area Background Papers

Central Warrington

ID	Name and Organisation	General Comments	WBC Officer Comments
BACEN/3	Peter and Irene Sergeant	Refers to Peel Hall at 7.1, without discussing the wider context. However, to do so is plainly important. For example, apart from the interaction with neighbouring Green Belt areas, any development would have traffic impacts in the already stressed M62 corridor.	Concerns regarding development at Peel Hall noted.
BACEN/2	Winwick Quay LLP	We support the identification of the A49 corridor as an " <i>important gateway to the town and as having potential to be transformed into a zone of active business and enterprise as well as environmental improvements</i> ". The corridor is identified within the Regeneration Framework as part of the Northern Spine within which regeneration and environmental upgrading will be encouraged. We have raised in accompanying representations on the Core Strategy Issues and Options Paper that the A49 Corridor should be identified as a strategic area for development to encourage the regeneration of key site and environmental improvements along the corridor.	Support noted. Representations on the Core Strategy Issues and Options Paper will be dealt with in that document.

Culcheth, Glazebury and Croft

ID	Name and Organisation	General Comments	WBC Officer Comments
BACUL/3	Mr M Durrington Culcheth and Glazebury Parish Council	We strongly disagree with the title of this paper. The title should be "Culcheth, Glazebury and Croft Core Strategy", reflecting the name of the ward, the names of the two parishes and the fact that these are the three inset villages. The simpler alternative would be to call this area Warrington North-East	The title of this background paper will be changed for future documents. Comments regarding accuracy are noted. Detailed facts and figures will be contained in pieces of evidence such as the Strategic Housing Land Availability Assessment and the Local Centres Study which is being reviewed in consultation with Parish Councils.

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>We are concerned that the paper does not describe the actual situation with respect to housing, employment and development opportunities. There is no reference in the General Description to the varied existing rural diversification, nor to the horse economy and the businesses that depend on it.</p> <p>The following comments refer to Culcheth and Glazebury unless Croft is specified</p>	<p>The background document is intended to be a summary of the existing situation rather than a detailed representation of it.</p> <p>Comments regarding clarity noted.</p> <p>The section will be amended as appropriate.</p>
BACUL/5	Mr M Durrington Culcheth and Glazebury Parish Council	<p>2.General Description</p> <p>2.1 Refer to "this neighbourhood or ward" as it is more clear. Add "There has also been housing development associated with the prison at Risley and on a lesser scale with Newchurch Hospital.</p> <p>2.2 Glazebury is not just "a ribbon development with no obvious centre" but a community centred on churches, a primary school and a cricket club. There is a major employer- the award winning Bents Garden Centre. The employment area at Albion Park is mainly distribution, and there is a large store selling clothing and other remaindered items. In addition there are farms, small businesses, shops and 5 public houses, 4 with restaurants.. There is a regular bus service to Leigh and Warrington. 4/hr in each direction.</p> <p>2.3 Replace "this area" with "Croft"</p> <p>2.4 Does "neighbourhood" mean "ward" ? Add M6 to M62 and A580</p> <p>2.5 Add "Leigh Business Park is on the main bus route and the Stonecross Lane employment area in Golborne is accessible by car. In addition to Bents and Albion Park there are many retail and office businesses as well as other businesses. There is large horse economy and varied farm diversification, an example being the Fishing Lakes and business premises on Glaziers Lane.</p> <p>2.6 After "library" add "churches, doctors, dentists, pharmacies, chiropodists and orthopaedic practitioners. After "secondary school" add "and pre school groups".</p>	<p>Comments regarding clarity noted.</p> <p>This will be clarified in future documents.</p>
BACUL/6	Mr M Durrington Culcheth and Glazebury Parish Council	<p>3. Key Facts and Figures This refers to the "Culcheth area" but gives figures for the entire ward..</p> <p>This should be clarified.</p>	<p>Comment noted. This will be clarified in future documents.</p>

Area Background Papers

ID	Name and Organisation	General Comments	WBC Officer Comments
BACUL/7	Mr M Durrington Culcheth and Glazebury Parish Council	<p>4 . Relationship to other areas</p> <p>4.1 Add " These add to the range of services and opportunities for residents of our villages. This ward is also linked to the North because it was originally in Lancashire, and until more recently some areas of Glazebury were in the Borough of Wigan.</p>	Comments noted. Future documents will reflect this.
BACUL/4	Peter and Irene Sergeant	<p>Contains no reference to Parkside and its wider implications, even though the pending application made to St Helens directly impinges on the boundary of this area, along Winwick Lane (A570)! This is even more surprising when you consider the repeated references to traffic problems, at 5.7, 6.1 and 7.2</p>	Comments noted. Future documents will reflect the emerging proposals and their implications.
BACUL/8	Mr M Durrington Culcheth and Glazebury Parish Council	<p>5. Key Elements of National Planning Policy</p> <p>5.4 The policy comment should read. " The growth of the New Town was accompanied by growth in the villages. In Culcheth Newchurch Hospital, the SRD site and the extra dwellings on the Prison Officers Estate (an extra 10 being added recently) were the larger housing areas whilst the conversion and additional housing on the New Hall Hostel site added 50 plus dwellings. Retirement flats and housing have added a significant amount. There have been other smaller developments at Ribchester and Petersfield Gardens , Trent, Paythorne , Daisy Bank Mill, Lawton, and Stainforth Closes as well as individual infill houses .</p> <p>In Glazebury, developments have been at Millbrook Close, Lowfield and Meadowbank Gardens, a small estate on Queens Avenue and an apartment block on Warrington Road. In addition to single infill houses a group of 5 are presently under construction.</p> <p>With respect to further development in Culcheth and Glazebury A site for 7 rented Housing Association houses already has permission as has a site for 10 houses".</p> <p>5.5 The nearby Birchwood area provides employment for Culcheth and Glazebury residents via a bus service of 2 per hour . There are 4 per hour to central Warrington. More central sites can compete because the bus routes are mainly radial. What is needed is a circular "cross country "route.</p> <p>5.6 We believe Glazebury Post Office should have been retained.</p>	<p>Comments noted. This section shows how development in the area reflects National Planning Policy. It is not intended that the section should detail all development that has occurred.</p> <p>Comments regarding bus routes, park and ride, congestion and greenways are noted.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>5.7 We query whether the rush hour congestion has increased but we need also to look at Birchwood's road capacity. One important cause of congestion both on the main roads and within the villages is that of obstructive parking. This can be dealt with in some part by double yellow lines and more robust monitoring but the issue of the availability of parking spaces in the village centre needs addressing.</p> <p>One of the problems is the informal park and ride where a parking space is occupied all day whilst the driver travels into Warrington by bus.</p> <p>More buses to Birchwood station than 1/hr are needed, as is a "rural rider" that travels round and within the villages during the day.</p> <p>5.8 Greenways, such as Culcheth Linear Park, and footpaths are important as is their upkeep. The Village Green is a most valued centre of Culcheth but has a drainage problem. Urban Green spaces, Parish Gardens and playing fields are a necessary balance to the built environment. The mosslands, other than the protected ones, need to be protected and improved. We are hoping the Parish Plan will address the questions on the built and natural environment.</p> <p>5.9 i. There are sheep, cattle, and poultry farms in the ward.</p> <p>ii. The Nobel (with one I) storage facility is now owned by Orica.</p> <p>iii. After Culcheth Linear Park add " and footpaths network"</p> <p>iv Council policies could do more by supporting and promoting local food, farm shops and protecting farmland from development</p> <p>5.10 Note Risley is both landfill and landraise. 100 hectares of land now lies under waste, well over half the area of Culcheth inset village. There is green waste processing on the redundant railway line north of Kenyon .</p>	<p>Comments noted. This section reflects comments received to the Borough Portrait consultation and as such cannot be amended.</p>
BACUL/9	Mr M Durrington Culcheth and Glazebury Parish Council	<p>6. Responses to the Borough Portrait</p> <p>The proposal for a parkway station at Kenyon was the subject of a Public Inquiry and was rejected .We disagree with this proposal, the way forward is to improve bus services to Birchwood Station with extra services for commuters. 1 bus/hour is not enough. Bus services to Glazebrook station should be included in the rural rider route.</p>	

Area Background Papers

ID	Name and Organisation	General Comments	WBC Officer Comments
BACUL/10	Mr M Durrington Culcheth and Glazebury Parish Council	<p>Altering existing public transport routes within villages is not viable which is why we need a rural rider.</p> <p>Rural businesses need to be supported by residents</p>	<p>Comments noted. Appropriate amendments will be made to future documents.</p>
BACUL/11	Mr M Durrington Culcheth and Glazebury Parish Council	<p>7. Key issues</p> <ol style="list-style-type: none"> 1. There has been housing development within the villages within the present policy framework. Further development is already planned which includes social housing. 2. There is existing capacity for employment both outside the villages and within them. 3. A key transport issue is obstructive parking, parking provision and its management. 4. Youth provision has been omitted 	<p>Comment noted and agreed. The background papers are intended to be taken forward and used for further involvement and discussion.</p>
BACUL/2	Mr Roger Lamming Secretary Croft Residents Action Group	<p>General comment. We see the background paper as a work in progress and the basis for further discussion.</p> <p>5.3 It is stated that there is no change to the extent of Green Belt... However, it is equally important that it should not be reduced (See my comments under Sections 2, 3 and 8 in the Core Strategy).</p> <p>5.4 The scope for significant housing development in Croft Village is limited. However, the scope for large scale development outside of the Village inset is limited by the complete lack of day to day facilities. There are no shops (except for 1 craft shop and 1 hairdressers), no post office or banks and no medical facilities. Any development should be on a small scale within the current Village Inset or where outside of it should be restricted to re-development of farm buildings and other derelict buildings. We do support the view that there is a need for affordable housing but this should be located close to day to day facilities and within easy reach of employment centres.</p> <p>5.5 There is now a disconnection between Croft and Risley. Croft is essentially still a dormitory village serving employment areas more widely across Warrington but additionally more widely across the North West particularly Liverpool and Manchester. There is little employment within the Croft Village and there is therefore no demand for development to meet local needs.</p>	<p>Comments regarding the extent of the Green Belt are noted.</p> <p>Comments regarding facilities are noted. The current designation of Croft as an Green Belt inset village allows only the development described. The Core Strategy must determine whether this approach continues to be appropriate.</p> <p>Comments regarding nature conservation, heritage facilities and public rights of way are noted.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>5.8 Croft has a Site of Importance to Nature Conservation (SINC) - Croft Grasslands, which additionally is an area of high landscape value cherished by local residents providing a sense of place. This should be preserved or even enhanced despite not being in public ownership.</p> <p>There is an opportunity to develop heritage facilities within the parish and the neighbouring Winwick Parish as these areas were key in the provision of early water supplies for Warrington. There is a network of shafts, adits, and pipelines together with a pumping station and a reservoir. Displays using information boards and signage could be erected showing the role they played.</p> <p>5.9 Access to the countryside via the Public Rights of Way (Public Footpaths) could be further promoted by improved signage together with suitable leaflets showing circular walks.</p>	

North and West Warrington

ID	Name and Organisation	General Comments	WBC Officer Comments
BANW/5	Peter and Irene Sargeant	<p>It may be a minor point. However, if the Council is genuinely concerned about maintaining the quality of the countryside, 5.9 is surely mistaken in the passage where it refers to the growth of equestrian businesses, which are frequently unsightly in effect, as if they were not actually signifiers of proximity to urban areas and part of the problem.</p> <p>2.8 and 5.3, together, acknowledge the particular sensitivity of the Green Belt in the vicinity of Winwick; 5.15 obliquely acknowledges the possibility that the open setting afforded by land south of the M62 could be lost, in respect of Peel Hall. However, 7.2 fails to draw this out or reflect on the more immediate threat of the Parkside development, even though it is described as a Green Belt location / site partially in Warrington, at both 4.4 and 7.1 (5.11-5.12 are silent).</p> <p>It is, of course, a mistake to confuse a location with a site, as defined in a speculative planning application. (Rather, the Council should, perhaps, be reflecting on the possibility that the project could grow, or transfer wholesale to a site with greater physical presence in Warrington, to the south-west). Further 5.7 says nothing about the SRFI as a cause of, or cure to, congestion, although the threat is noted at 6.1 and congestion itself is mentioned as a key issue at 7.2.</p>	<p>Comments regarding equestrian businesses are noted.</p> <p>Comments regarding clarity in terms of Green Belt and Parkside are also noted. Future documents will be more precise.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>6.3 refers to maintenance of Green Belt. Like 7.2 it stands in contradiction of the assumption that development will take place in Warrington's Green Belt, as a consequence of the Parkside Project.</p> <p>If the words 'in the near future' in 7.2 are a get-out clause, they will apply <i>mutatis mutandis</i> to anybody who wants to take advantage of them. Equally, one is entitled to argue that, given the heading, they mean there is security up until, at least, 2021. (For comparism, see the identical wording used at 7.2 of the Culcheth and Croft, along with the South Warrington, paper; only the East Warrington paper is unequivocal).</p> <p>Much greater clarity is required!</p>	<p>Comment noted regarding established employment areas.</p> <p>The quantitative capacity assessment of the Retail and Leisure Study 2006 is currently being updated. This will help to inform whether further retail allocations are necessary in the borough over the plan period.</p> <p>In accordance with Government Guidance and the town centre first approach set out in PPS6, the preferred location for new retail floorspace would be within the town centre retail core, followed by edge of centre and out of centre sites only when more sequentially preferable sites are not available, suitable or viable.</p>
BANW/2	Winwick Quay LLP Mr Richard Birchfield Planner Cushman & Wakefield LLP	<p>We support the existing UDP aim of directing and encouraging investment in established employment areas such as Gemini Business Park and Winwick Quay.</p> <p>As part of balancing future retail needs and in addition to town centre allocations, consideration should also be given to locating new retail provision in appropriate fringe and out of centre locations and those existing retail destinations which are accessible and sustainable.</p>	
BANW/3	Winwick Quay LLP Mr Richard Birchfield Planner Cushman & Wakefield LLP	We note that Gemini Business Park is identified as an important area in terms of employment provision in the borough which should be protected and enhanced. We consider that the Winwick Quay area serves a similar function in employment terms and should likewise be enhanced and promoted for appropriate employment opportunities where possible.	Comment noted. All areas of employment provision should be identified in a similar way.

South Warrington

ID	Name and Organisation	General Comments	WBC Officer Comments
BASTH/2	Peter and Irene Sargeant	Notes the Port Warrington initiative at 7.1 but fails to examine the wider implications, despite hints of potential conflicts with swing bridges and congestion, as at 2.5, 3.1 and 6.1. Are there not, perhaps, Green Belt implications, too?	Comment noted. As proposals for the area emerge, it will be possible to consider wider implications including congestion and Green Belt issues.

4 Topic Background Papers

Climate Change

ID	Name and Organisation	General Comments	WBC Officer Comments
BTCC/2	Clare Oliver Project Development Officer The Mersey Forest	<p>The Mersey Forest is an environmental regeneration initiative creating woodlands and involving people across Merseyside and North Cheshire. The Mersey Forest Partnership includes seven local authorities (Cheshire West and Chester, Halton, Knowsley, Liverpool, Sefton, St.Helens and Warrington) as well as the Forestry Commission, Natural England and businesses including United Utilities.</p> <p>The Partnership works to the 30-year Mersey Forest Plan, written in 1994 and updated in 2001. The Plan sets a target of creating 8,000 hectares of new community woodlands over its 30 years, bringing a wide range of environmental, economic and social benefits. The plan is advisory and seeks to bring about changes to the character and landscape of North Cheshire and Merseyside. This provides a framework for each local authority district, enabling the implementation of policies and opportunities for changing land use. Since 1994 the Partnership has planted over 8 million trees and brought more than 70% of the woodlands in the Forest into management to secure their long-term future.</p> <p>Networks, such as The Mersey Forest, of woodlands and other habitat are increasingly being recognised as part of our green infrastructure.</p> <p>The Mersey Forest Team welcomes the opportunity that Warrington has taken to include climate change adaptation and mitigation within its Local Development Framework.</p> <p>Green Infrastructure is defined in the North West GI Guide (see www.greeninfrastructurenew.co.uk) as "the region's life support system - the network of natural environmental components and green and blue spaces that lies within and between the North West's cities, towns and villages and provides multiple social, economic and environmental benefits".</p> <p>Green Infrastructure has an important role to play in adapting for climate change. A recent research project into 'Adaptation Strategies for Climate Change in Urban Environments (ASCCUE)' at the University of Manchester has shown that adding 10% green cover to built up areas keeps surface temperatures at current day levels until the 2080s. It also can help us to adapt for increased rainfall and can provide corridors and habitats to allow for the northward migration of wildlife.</p> <p>Key recommendations from ASCCUE, which should be incorporated into planning where possible, were to:</p>	<p>Agreement and comments noted. Greater emphasis will be given to the links between Climate Change and Green Infrastructure and the role that the Mersey Forest Initiative.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Protect critical environmental capital (where green infrastructure assets have a demonstrable level of climate functionality, e.g. city/town centre parks, floodplains, areas where the soil has a high infiltration rate);</p> <ul style="list-style-type: none"> ● Ensure no net loss of green cover; ● Undertake creative greening to enhance green cover. Particular attention should be given to the public realm in town centres to ensure a sufficient range and quality for human comfort, and to new planting in locations where a low greenspace cover combines with socio-economic deprivation and / or human vulnerability; ● Take opportunities to improve green provision during urban restructuring and new developments; ● Ensure a water supply for vegetation, in order to sustain the functionality of greenspace during times of drought. 	<p>Comment noted. The investigation of cross boundary issues and solutions is now a key priority for work being undertaken on the Core Strategy and a preliminary meeting with officers at Salford Council has already investigated a joined up policy approach to the Mosslands. These issues will be taken into account.</p>
BTCC/3	Mrs Jacqueline Johnson Cheshire Branch CPRE	Cross boundary issues should also include references to Wigan MBC to the North and Salford to the East. One of the important issues with Salford is that of the mosslands. These are important in the mitigation of climate change and should be protected and improved. The Councils are already working together and there should be clear cross boundary policies on this issue.	
CSIO/177	Peter and Irene Sargeant	Promising to fulfil an aspirational level, as envisaged at 7.1, is something of a contradiction in terms.	The need to distinguish between aspirational and achievable targets relating to climate change is noted.

Topic Background Papers

Employment

ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/243	Phil Lally Government Office for the North West	<p>The employment background paper asks: "What level of economic development should be planned for in Warrington". The Issues and Options Report says that: "We need to ensure that an appropriate level of economic development is planned for in Warrington. Different levels of housing growth will have different implications for the level of economic development planned for in the Borough". Clearly further work is necessary to develop these issues.</p> <p>RSS indicates that there is a considerable oversupply of employment land in Cheshire and Warrington, a surplus of 438 hectares, which results in a requirement to de-allocate land. It says that the average site size in Cheshire and Warrington is over 20 hectares, with sites over 5 hectares making up 88% of committed employment land. It therefore suggests that reducing the supply may be achieved by the de-allocation of a small number of larger sites. There is no indication in the Issues and Options Report that this matter has been examined and what the alternatives are in terms of de-allocation. There is a need to work closely with the Cheshire authorities to determine how the de-allocation of employment land can be addressed via the LDF process. This joint working, as well as joint working with other neighbouring authorities, should also inform how much and what type of employment land is required in Warrington.</p> <p>Until the issues about the scale of housing and employment land requirements are clearer it is difficult to comment on the proposed spatial options.</p>	<p>It is acknowledged that further work is needed to refine the options presented by quantifying housing and employment land requirements to allow meaningful comment. Future consultations will allow further comment.</p> <p>The issue of oversupply is being addressed as part of evidence base joint work through the Cheshire and Warrington Economic Alliance. The findings of such studies will inform future documents and will be used to justify an appropriate level of provision in Warrington.</p>
CSIO/177	Peter and Irene Sargeant	Again, there is a surprising omission: the potential cross-boundary effect of the Parkside project, given the potential number of jobs.	Comments regarding the omission of the potential cross-boundary effect of the Parkside project on employment levels are noted. Future documents will be amended to reflect this.

Green Infrastructure

ID	Name and Organisation	General Comments	WBC Officer Comments
BTGI/4	Mrs Jacqueline Johnson Cheshire Branch CPRE	The list is incomplete. No mention of The Red Rose Forest e.g. Windy Bank Farm East of Glazebury, or of the Mosses, e.g Chat Moss to the East and Risley Moss. All these areas provide places to visit and walk The footpath system to the North links with Wigan MBC	Comment noted. These areas will be taken into account in future documents.
CSIO/177	Peter and Irene Sargeant	Says nothing of note about the strategic role of the Green Belt.	Comments regarding the Green Infrastructure paper are noted. Future Green Infrastructure documents should refer to the strategic role of the Green Belt.

Housing

ID	Name and Organisation	General Comments	WBC Officer Comments
CSIO/242	Phil Lally Government Office for the North West	The housing background paper identifies a number of different levels of annual dwelling requirements ranging from 380 up to 1300. It would be appropriate in the first instance to examine alternative options to meet the RSS requirement and the housing growth point aspirations.	Comment noted. The RSS requirement and growth point aspirations will be the focus of initial work through the Strategic Housing Land Availability Assessment to ensure a 5, 10 and 15 year supply of housing can be delivered. The Strategic Housing Land Availability Assessment will also inform assessments of any additional capacity.
CS10/177	Peter and Irene Sargeant	This is the one paper which seems to miss the point about oversupply, when it is the very one which should be addressing it. Compare the area papers, at 5.16. Or is 5.16 referring to the RSS which used to be RPG and changed its name to satisfy the vanity of somebody in Whitehall?	Comments regarding addressing the oversupply of housing are noted. Future documents will be amended to reflect this.

Topic Background Papers

Town Centre		ID	Name and Organisation	General Comments	WBC Officer Comments
BTTC/7	Sarah Jones Turley Associates	<p>1. The Background Paper is unclear whether the 2006 Retail and Leisure Study will be updated to provide a more relevant background to the preparation of the LDF Core Strategy and other LDF documents. Para 6.7 refers to an update, yet para 9.1 refers to no further allocations being made as a result of the 2006 study findings. It is considered that an update to the study is required to provide a robust evidence base for considering potential allocations and regeneration options for sites on the fringe of the town centre as identified in the Core Strategy Issues and Options Report.</p> <p>2. The town centre inset boundary, as defined in the adopted UDP (bounded by Midland Way to north; railway line to west and south and Mersey Street/Back Street to east), is a relevant and definable area having regard to landuses and barriers to linkage/pedestrian movements. The town centre retail core as defined in the adopted UDP is also considered to be relevant on these counts.</p> <p>The base plan of the town centre used in the adopted UDP is now out of date as it does not include the extension and improvements to Golden Square. The LDF map base should be updated accordingly.</p> <p>3. Primary frontages - This consultation seeks comments on the boundary/locations for primary frontages in the town centre. This also includes frontages in Golden Square shopping centre. It should also be a starting point for the more detailed consideration of the frontage policy wording. In the adopted UDP, all frontages within Golden Square shopping centre have been recognised as primary frontages where proposals for non A1 uses have been subject to criteria including a percentage frontage consideration and restriction on adjoining units.</p> <p>The adopted UDP policy for primary frontages has been shown to be inappropriate and overly restrictive for the shopping centre. In addition, the current UDP policy does not reflect the planning permission for the centre and its extension which provides for a wider range of A1/A2/A3 uses, recognising that other uses within the centre can complement and enhance its shopping function and that of the town centre as a whole.</p>	<p>The quantitative analysis contained in the 2006 Retail and Leisure Study is currently being updated. The level of future allocations will therefore be determined by up to date evidence.</p> <p>Comments regarding the town centre inset boundary and town centre retail core are noted.</p> <p>The base plan of the Proposals Map will be updated as and when the map is updated as part of the Core Strategy.</p> <p>Comments regarding the primary shopping frontages are noted, as the Background Paper suggests, amendments to the primary shopping frontages will be the subject of future consultations.</p> <p>Support for additional leisure facilities within the town centre as well as the catering strategy is noted.</p>		

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>The preparation of the LDF gives the opportunity to review whether primary frontages should be designated within Golden Square shopping centre, or whether the shopping centre should be treated as a whole and separate to a general frontage policy. It also allows the reformatting of the frontage policy itself. We would seek to be involved in further such discussions on frontage identification/policy wording.</p> <p>4. Additional leisure facilities within the town centre such as cinema or health and fitness are supported and will aid the vitality and viability of the centre.</p> <p>5. It is noted that a catering strategy for the centre is being considered and this would be welcomed and we would be keen to be involved in any further consultations on this.</p>	
BTTC/2	Winwick Quay LLP	We support the approach of including the network of district, neighbourhood and local centres as part of the definition of Warrington "town centre".	Support noted.
BTTC/3	Winwick Quay LLP	We are aware that there is a gap in the current evidence base as the Retail Capacity Study dates from 2006. Since its production there has been significant alterations in the retail provisions within the town centre which poses significant questions in regards the capacity for future retail and leisure additions.	Comment noted. The quantitative capacity analysis included within the 2006 report is currently being updated based on an up to date household survey and will be published in due course.
BTTC/4	Winwick Quay LLP	The evidence base for the town centre core strategy should include reference to relevant supplementary planning documents such as the Bridge Street Area SPD (draft).	Comment noted, and agreed. The document will be amended accordingly.
BTTC/5	Winwick Quay LLP	Section 7.5 Should Warrington town centre continue to occupy its current position within the retail hierarchy and stem leakage to other centres such as Manchester, Liverpool and St Helens the continued quantitative and qualitative enhancement of its services must be realised.	Comment noted. Warrington's geographical position between regional centres means that the borough will always experience a certain level of leakage, but development in the town centre appropriate to Warrington's position in the retail hierarchy will be supported.
BTTC/6	Winwick Quay LLP	Section 9.1 Against the backdrop of an out of date evidence base, specifically the Retail and Leisure Study 2006, it is difficult to comment on the validity of adopting an approach of making no further allocations for retail provision and the effectiveness that focusing on the improvement of existing facilities will have on the town centre.	The quantitative analysis contained in the 2006 Retail and Leisure Study is currently being updated using an up to date household survey. The level of future allocations will therefore be determined by up to date evidence.
			Edge of centre and out of centre proposals will be assessed against existing policy and evidence available at the time.

Topic Background Papers

ID	Name and Organisation	General Comments	WBC Officer Comments
		We would echo comments raised in associated representations made to the Bridge Street SPD, Core Strategy Issues and Options Paper and other background papers that edge of centre/out of centre locations could play a significant role in the revitalisation of the centre. The town centre, including its fringe areas, can be reinvigorated through the provision of mixed use developments which will offer a wide range of uses including leisure, residential, retail, office and cultural/civic likely to stimulate both the daytime and evening economy.	
ID	Name and Organisation	General Comments	WBC Officer Comments
BTTRAN/2	Winwick Quay LLP	We agree with key messages and themes as drawn from PPG13: Transport and the RSS. However we feel a little more weight should be attributed to the policies of the RSS as this now identifies Warrington as a Regional Gateway.	Comment noted, and agreed.
BTTRAN/3	Winwick Quay LLP	The overview of local planning policy highlights the main transport objectives and policies as set out within the UDP. This is clearly a non exhaustive list and could include reference to further relevant policies of the UDP.	Comment noted and agreed. The document will be amended to reflect this.
BTTRAN/4	Winwick Quay LLP	As acknowledged in section 6.2 there is a significant "hole" in the evidence base at this current time. The transport core strategy needs to be based on an up to date borough-wide strategic multi-modal transport model. The current strategic model, updated in 2005, does not model public transport and the 1999 transport model, built as part of the Warrington integrated transport study, is now out of date.	Comment noted, and agreed. A borough wide multi modal transport model is currently being produced and will be used to test the different options that emerge through this process.
BTTRAN/5	Winwick Quay LLP	One approach to tackling congestion could be through the provision of new high density commercial, business and employment uses within existing central areas and existing concentrations of development which are accessible and make the best uses of existing transport infrastructure.	Comment noted, and agreed. The best use should be made of existing infrastructure whilst taking into account the effects of trip generation of proposed development on existing congestion issues.
BTTRAN/6	Louise Morrissey Peel Holdings	1. This paper highlights improvements that are proposed to rail and station services which are generally supported. Pedestrian linkages and improvements between the railway stations and the bus station are not specifically mentioned and should be a factor for consideration to help make public transport and walking access to/around the centre more attractive.	Comments noted and agreed. The document will be amended to reflect the need for improved pedestrian linkages between the railways stations and the bus station. The impacts of demand management measures will be fully assessed.

Transport

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>2. The wider economic impacts of demand management measures (such as increased parking charges) should be very carefully considered and must not deter visitors to the centre in the face of transfer to other centres (eg Trafford Centre/ Liverpool/Manchester).</p>	<p>It is acknowledged that Port Salford and Parkside are emerging proposals that do not currently have planning permission. Future documents will reflect their emerging status.</p> <p>Comments regarding updated and improved modelling capability are noted. The Multi Modal Transport Model for Warrington, which is currently under construction will help to give a more accurate picture of the implications of proposals in and around the area.</p>
CSIO/177	Peter and Irene Sargeant	<p>3.7-3.8 are mistaken in treating Port Salford as a fait accompli as is 7.3 in describing Parkside in similar terms, including the 10,000 complement of jobs.</p> <p>It is far from certain that all elements are acceptable and the Council should not prejudice its own consideration in this way. If the proposals are 'called in', the Council will still be expected to take a considered position and look after the interests of affected residents.</p> <p>Clearly, all projects have to be assessed on the basis of the best information available, which means using estimates (computer models). However, 7.5 takes a very resigned position on the projects referred to (specifically, only the new Mersey bridge and Parkside), when the paper itself at 6.1-6.2 refers to the need to apply, update and improve existing modelling capability, in face of evidence of stress, and 8.1 refers to reported congestion issues - though, curiously, less effectively than the area papers do for Warrington, as a whole: see representative comments at 5.7 of the East Warrington paper, for example.</p>	

Sustainability Appraisal Scoping Report

5 Sustainability Appraisal Scoping Report

ID	Name and Organisation	General Comments	WBC Officer Comments
CSSCOP/2	David Goode NWDA	We welcome and support the amendments to the report that have been made in response to our earlier comments on the 2006 Scoping Report. As such we consider that the updated report presents a more balanced and comprehensive framework for the Sustainability Appraisal of emerging local development documents.	Support noted
CSSCOP/4	Janet Belfield Natural England	Thank you for your consultation dated 30 January 2009 received on 1 February 2009. We acknowledge that this is an updated report following initial consultation in 2007. We welcome this opportunity to update and revise the document as necessary to make it fit for purpose for the next stages of your Local Development Framework (LDF). We support this 'framework' approach provided that the main document is revised at frequent intervals to keep it fit for purpose. Our comments below follow the structure of the report, with additional comments concerning the Biodiversity Duty and Habitats Regulations Assessment:	Support for the framework approach to Sustainability Appraisal is noted.
CSSCOP/11	Judith Nelson English Heritage	I refer to your letter dated 30 th January 2009 consulting English Heritage on the above report. Unfortunately I am unable to respond in detail, however I attach English Heritage guidance on SEA/SA and the historic environment which should be helpful.	The contents of the English Heritage guidance have been noted.
CSSCOP/14	Janet Belfield Natural England	Biodiversity Duty Biodiversity is a core component of sustainable development, underpinning economic development and prosperity, and has an important role to play in developing locally distinctive and sustainable communities. From 1 October 2006, all local authorities and other public authorities in England and Wales have a Duty to have regard to the conservation of biodiversity in exercising their functions. The Duty aims to raise the profile and visibility of biodiversity, to clarify existing commitments with regard to biodiversity and to make it a natural and integral part of policy and decision making. The Duty is set out in Section 40 of the Natural Environment and Communities Act (NERC) 2006 and states that: "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity".	Comments noted. Reference to the biodiversity duty will be included in future documents and guidance in implementing the duty followed.

ID	Name and Organisation	General Comments	WBC Officer Comments
CSSCOP/12	David Goode NWDA	We are pleased to note that the Northern Way Growth Strategy is now recognised as a pan-regional study; however we wish to reiterate that the authorship should be credited to the Northwest Regional Development Agency, One North East and Yorkshire Forward, rather than the ODPM.	Comment noted - the document will be amended accordingly.
CSSCOP/13	David Goode NWDA	On a minor note of detail, table 6 in Section 4 appears to identify a significant number of key sustainability issues under the heading economic (5th heading) which are essentially environmental. Presumably this is an error, and that the column header should read 'Environmental'	Comment noted - the document will be amended accordingly.
CSSCOP/7	Ms Samantha Turner Principal Planning Officer 4NW	<p>Table 4 - Regional Context and Appendix 1, Table 5 Plans, Policies and Programmes Review</p> <p>RSS</p> <p>Regional Spatial Strategy for the North West was published in September 2008. The Regional Planning Body is 4NW not NWRA</p> <p>Regional Housing Strategy</p> <p>A Revised Regional Housing Strategy will be published by 4NW at the end of March 2009.</p> <p>Action for Sustainability - <u>Regional Sustainable Development Framework (2005)</u></p> <p>This document is no longer current and should not be included. Sustainable Development Principles for the Region have been incorporated into other documents including RSS, and the emerging RS. Regional Strategy</p> <p>Reference could be made to the emerging Regional Strategy.</p> <p>You will no doubt be aware of the Government's response to their consultation on the Sub National Review [1] and the subsequent publication of draft legislation [2] which sets out the Government's plans for each region outside of London to develop a Regional Strategy (section 65).</p> <p>It is intended that the Regional Strategy will in time replace the RSS and the Regional Economic Strategy (RES). The draft legislation identifies (section 65(6)) that the Secretary of State will direct which parts of the current published RSS and RES in each region will be deemed to form the Regional Strategy at the time the legislation is enacted. An important point to note is that the Regional Strategy will be part of the development plan (section 76) directly replacing the role currently occupied by the RSS.</p>	<p>The document will be amended in the following ways:</p> <ul style="list-style-type: none"> - The Regional Planning body will be changed from NWRA to 4NW - The new Regional Housing Strategy (March 2009) will be included - Action for Sustainability - the Regional Sustainable Development Framework (2005) will be deleted. - The emerging RS2010, The North West Best Practice Design Guide (May 2006) and the North West Green Infrastructure Guide will be included.

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ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>In advance of the legislative framework, regional agencies are developing a non statutory version of the Regional Strategy for the North West. The Regional Strategy will be a new and clear strategic investment framework for the region which builds on the learning gained in the process of developing the RES 2006, the Regional Spatial Strategy and current Partial Review of RSS and the Regional Housing Strategy. This Regional Strategy will not be statutory. It will provide an important building block which will give the region a head start in the development of a statutory Single Regional Strategy once the emerging primary legislation is in place. Further information on the Regional Strategy is available on the dedicated website http://www.nwregionalstrategy.com/.</p> <p><u>Other useful Regional Documents to include</u></p> <ul style="list-style-type: none"> North West Best Practice Design Guide (May 2006) http://www.nwra.gov.uk/documents/?page_id=4&category_id=105 North West Green Infrastructure Guide http://www.greeninfrastructurenw.co.uk/resources/GIguide.pdf <p>[1] Prosperous Places: taking forward the review of sub-national economic development and regeneration. The Government response to public consultation (25 November 2008)</p> <p>[2] Local Democracy, Economic Development and Construction Bill (Part 5 of the Bill)</p>	<p>It is not considered appropriate to add pieces of legislation to the table in Appendix 1 as these set out process and do not include objectives, targets and indicators that can feed through the process.</p> <p>Other documents will be included within the table where relevant.</p> <p>Support for the key messages that have emerged from the review of policies is noted.</p>
CSSCOP/15	Janet Belfield Natural England	<p>Section 2 ~ Review of Relevant Policies, Plans and Programmes</p> <p>We suggest that you check that the following documents are covered within the main list of relevant plans/policies and programmes:</p> <p>National</p> <ul style="list-style-type: none"> • Wildlife and Countryside Act (as amended) 1981 • Countryside and Rights of Way Act (as amended) 2001 • Natural Environment and Rural Communities Act 2006 • Conservation (Natural Habitats & C) Regulations 2006 • PPS9 Good Practice Guide. 	

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Guidance for Local Authorities on Implementing the Biodiversity Duty. (Defra, 2007) http://www.defra.gov.uk/wildlife-countyside/pdfs/biodiversity/la-guid-english.pdf</p> <p>Biodiversity Indicators in Your Pocket. (2007) Defra. http://www.jncc.gov.uk/pdf/2010-BIYP2007.pdf</p> <ul style="list-style-type: none"> * Accessible Natural Green Space Standards in Towns and Cities. (2003) Natural England (English Nature) http://www.english-nature.org.uk/pubs/publication/PDF/526.pdf 'By all reasonable means: inclusive access to the outdoors for disabled people.' CA 215. (Countryside Agency 2005). <p>http://naturalengland.twoten.com/naturalenglandshop/docs/CA215.pdf</p> <ul style="list-style-type: none"> Environmental Quality in Spatial Planning - Incorporating the natural, built and historic environment, and rural issues in plans and strategies (2005). Natural England (Countryside Agency/English Nature)/English Heritage/Environment Agency. Available at http://www.countryside.gov.uk/LAR/Landscape/PP/index.asp 'The Countryside In and around Towns - a vision for Connecting Town and Country in Pursuit of Sustainable Development', Countryside Agency and Groundwork, 2005. <p>http://naturalengland.twoten.com/naturalenglandshop/docs/CA207.pdf</p> <p>Regional/Sub-regional</p> <ul style="list-style-type: none"> North West Green Infrastructure Guide 2007. North West Green Infrastructure Think Tank. Rising to the Challenge: A Climate Change Action Plan for England's Northwest (NWDA, 2006). Available at http://www.nwda.co.uk/publications/business/rising-to-the-challenge---a-cl.aspx Countryside Character Volume 2: North West. Natural England (Countryside Commission) CCP536. Strategic Flood Risk Assessment. <p>We welcome the all the key messages that have emerged from the review of policies, plans and programmes, in particular:</p> <ul style="list-style-type: none"> Adhere to principles of sustainable development; Protect and enhance the built and natural environment; Conserve and enhance biodiversity; 	

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ID	Name and Organisation	General Comments	WBC Officer Comments
CSSCOP/16	Janet Belfield Natural England	<p>Minimising the causes of, and adapting to the impacts of climate change; and</p> <ul style="list-style-type: none"> • Enhance health and well-being. <p>Section 3 ~ Collecting Baseline Information</p> <p>As far as our interests are concerned we consider that the following should be key messages coming from any baseline review:</p> <ul style="list-style-type: none"> • conserve and enhance landscape (and townscape) character and quality; • conserve and enhance biodiversity and geodiversity; • conserve and enhance opportunities for public access to the countryside; • adopt a strategic approach to planning and provision of green infrastructure; and • ensure the natural environment can adapt and mitigate the effects of climate change. <p>Our previous letter of November 2006 explained the data that was available from Natural England, some of which has been referred to in this document.</p>	<p>Comments noted. Many of the key messages set out are objectives and not key sustainability issues or problems identified through this particular process informed by an analysis of the baseline information. These will not therefore be included specifically in table 6, but will be reflected in the development of the sustainability assessment framework. Where appropriate the document will be amended to reflect the key messages in the key sustainability issues identified in table 6 which results from amongst other processes, the review of the baseline evidence.</p>
CSSCOP/17	Janet Belfield Natural England	<p>Landscape</p> <p>Data on 'landscape' is often lacking and in this instance we particularly welcome the list of comprehensive landscape data listed in paragraph 3.4. Given that 'landscape' has many dimensions and includes a number of different elements, we would suggest the inclusion of a clear definition of landscape in the report that can also follow through into DPDs and SPDs. The definition of landscape specified within the European Landscape Convention (ELC) is, '<i>an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors</i>'. The references to landscape in this report could provide the links to a distinctive landscape character policy in the Core Strategy and DPDs.</p>	<p>The definition of landscape given will be included in the glossary of the document.</p> <p>Work has been undertaken on Landscape Character Assessment in Warrington. Consideration will be given as to how this can feed into the Core Strategy production process.</p> <p>The ELC was signed by the UK government on 24 February 2006, ratified on the 21 November 2006, and became binding on 1 March 2007. The convention highlights the need to recognise landscape in law, to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. It also encourages the integration of landscape into all relevant areas of policy, including cultural, economic and social policies. See http://www.landscapecharacter.org.uk/elc.</p>

ID	Name and Organisation	General Comments	WBC Officer Comments
CSSCOP/18	Janet Belfield Natural England	<p>Landscape character is defined as 'a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse'. Put simply, landscape character is that which makes an area unique. Landscape Character Assessment (LCA) is an approach to understanding the differences between landscapes, and can serve as a framework for decision-making that respects local distinctiveness. We would encourage the use and recognition of Landscape Character Assessment to inform the potential impact of development and monitor landscape change.</p> <p><i>Habitats Regulations Assessment / Biodiversity</i></p> <p>Firstly a general point to note is that Natural England uses the term 'Habitats Regulations Assessment' of plans rather than 'Appropriate Assessment.' The term Appropriate Assessment refers to a specific stage within the Habitats Regulations Assessment process. To refer to the whole process as 'Appropriate Assessment' is confusing and the way in which this terminology is used does not comply with the Regulations. We would therefore welcome the title of sections 1.20 - 1.25 being revised to read 'Habitats Regulations Assessment'.</p> <p>We confirm that the regulations require the local planning authority to consider whether their Local Development Documents, and in this instance the Core Strategy, Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), are likely to have a significant effect on a European Site in Great Britain, alone or in combination with other plans and projects. If, after screening, a significant effect is likely the plan must be subject to an "appropriate assessment" as required by Article 6(3) of the Habitats Directive and regulation 85B of the Conservation (Natural Habitats &c) Regulations 1994, as amended.</p> <p>We would welcome specific reference to the 'Biodiversity Duty' in this document and all DPDs and SPDs along with appropriate text that highlights how the 'Biodiversity Duty' is being applied to your Council's planning functions through these documents. There are also, of course, many other opportunities to conserve and enhance biodiversity as well as through HRA, which is specific to European Sites, and we would welcome inclusion of these too.</p>	<p>Comments noted. Future documents will refer to Habitats Regulations Assessment rather than Appropriate Assessment.</p> <p>A Habitat Regulations Assessment Screening of the Core Strategy will be carried out in the near future and sent to Natural England for their consideration.</p> <p>Reference to the Biodiversity Duty will be made in any Habitat Regulations Assessment undertaken.</p>
CSSCOP/19	Janet Belfield Natural England	<p><i>Objectives and Indicators</i></p> <p>As far as objectives and indicators are concerned we are broadly seeking the following:</p> <p>Objectives</p>	<p>Objectives 6, 10, 15 and 19 will be amended accordingly. Objective 13 will be amended to refer to geodiversity as well as biodiversity.</p>

Sustainability Appraisal Scoping Report

ID	Name and Organisation	General Comments	WBC Officer Comments
		<p>Conserving and enhancing landscape (and townscape) character and quality; and local distinctiveness;</p> <p>Conserving and enhancing biodiversity, ensuring that it includes both habitat <u>and species</u>;</p> <p>Conserving and enhancing geodiversity;</p> <p>Providing and enhancing opportunities for public access to a good quality green spaces and the countryside;</p> <p>Sustainable design and construction; and</p> <p>Adaptation and mitigation of the effects of climate change.</p> <p><i>Indicators</i></p> <ul style="list-style-type: none"> • The use of Landscape Character Assessment to provide baseline information, targets and indicators for 'landscape' and 'townscape'; • Links to Biodiversity Action Plan targets for habitat and species; • Sustainable design standards for new built developments, and sustainable drainage systems (SUDS); • Use of our Accessible Natural Green Space Standards (ANGST) for green space, (* see list of PPP's on page 2); • Quality, accessibility and length of Public Rights of Way; • Installation of micro-generation renewable energy technologies. <p>We have the following specific comments to raise concerning the objectives and indicators the report:</p> <ul style="list-style-type: none"> • Objective 6 should include 'sustainable' alongside good quality, affordable housing; • Objective 10 needs to include 'protect' alongside provide and enhance leisure opportunities, recreation facilities, green infrastructure and access to the countryside. We would welcome inclusion of an indicator to show the amount of accessible green space close to people's homes. The use of our ANGST standards would be appropriate here; • We acknowledge that there is a lack of indicators for objective 12, I landscape. We would welcome the use of landscape character assessment to fill this gap; • Objective 15 should include 'mitigate' the impacts of climate change; • Objective 19, we support this objective that ensures high quality and sustainable design for buildings, spaces, and public realm. However, the use of 'sensitive' is perhaps the wrong choice of term and we would welcome the use of 'appropriate' instead; and • We would welcome an additional objective to 'conserve and enhance geodiversity', as this has been omitted from the report. 	Consideration will be given to the inclusion of the additional indicators suggested to support objective 12 where possible.

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CSSCOP/20	Janet Belfield Natural England	<p>Section 4 ~ Identifying Sustainability Issues and Problems</p> <p>We would welcome issues raised to relate to the key messages emerging from the policies, plans and programmes review. In particular we would welcome the following raised as additional issues as they have not filtered through from the key messages:</p> <ul style="list-style-type: none"> • Sustainable design and construction; • Conserve and enhance local landscape character and quality, and promote local distinctiveness; • Conserve and enhance opportunities for public enjoyment of the natural environment and green spaces for the well-being of residents; • The necessity to provide, conserve, maintain and enhance green infrastructure for its wide ranging contribution to biodiversity, geodiversity, as a recreation resource for the benefit of the health and well-being of residents, and as a means of mitigation against the effects of climate change; • Brownfield sites are often of biodiversity value. Can they provide opportunities for green infrastructure instead of built development? • Conserve and enhance geodiversity and geological conservation; • The Core Strategy and DPDs should provide a framework for good quality sustainable transport to provide a viable alternative to the use of the car. Therefore provide, enhance and maintain a sustainable transport network to provide viable alternatives to the use of the car. Sustainable transport should also provide access to and from the countryside to encourage healthy, active lifestyles for the benefit of the borough's residents. • The planning system has a role to play in improving the health of people. Active lifestyles should be promoted and you could also refer to the value of the Warrington countryside to the borough. It is a real asset; 	<p>Many of the key messages set out are objectives and not key sustainability issues or problems identified through this particular process informed by an analysis of the baseline information. These will not therefore be included specifically in table 6, but will be reflected in the development of the sustainability assessment framework. Where appropriate the document will be amended to reflect the key messages in the key sustainability issues identified in table 6 which results from amongst other processes, the review of the baseline evidence.</p>
CSSCOP/21	Janet Belfield Natural England	<p>Section 5 ~ Developing the Sustainability Framework</p> <p>We strongly support the Framework approach being taken provided that the main document is kept up to date. We broadly welcome objectives that relate to conservation and enhancement of biodiversity; conservation and enhancement of local landscape character and quality; and provision, conservation and enhancement of opportunities to enjoy the natural environment. We refer to comments made earlier in this letter under section 3, again, geodiversity, has been omitted from the objectives and we would welcome its inclusion. We have the following specific comments to make concerning revisions to the table at 5.6:</p>	<p>Support for the framework approach noted alongside the need to keep the main document up to date.</p> <p>Comments regarding geodiversity are noted and the document will be amended accordingly.</p>

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CSSCOP/9	Winwick Quay LLP Mr Richard Birchfield	<p>Objective 5, health, relates to environmental as well as social; Objective 11 'protect and enhance places and buildings of historic, cultural and archaeological value' should relate to economic objectives as well as environmental;</p> <p>We are in agreement with the inclusion of those plans, policies and documents highlighted under section 2 of the Core Strategy Scoping Report with the exception of the omission of the proposed changes to PPS6.</p> <p>Although the weight which may be attached to the draft revisions of PPS6 is limited, we feel that the proposed revisions, if accepted, are significant enough to provoke a change in the manner in which retail development is both proposed and considered.</p> <p>The proposals include replacing the current "Needs" test with a substantially revised emphasis being placed on "Impact". The revised proposals, if accepted, would take into consideration positive impacts whereby sound design, regeneration benefits and job creation can be provided as justification for edge-of-centre retail development. This requires flexibility in the way which policy is able to respond to changes in circumstances, whilst being robust enough to ensure that the vitality and viability of the town centre is protected.</p> <p>In respect to the local context, we note that no evidence of a recent Retail Study has been put forward for consideration. The existing study's survey data dates back to 2006, and the period in which the expansion of the Golden Square was under construction. As such we are concerned that the demand for additional convenience/comparison retail floorspace is untested and should be updated as part of the LDF process.</p>	<p>Comments regarding table 5.6 are noted and the document will be amended accordingly.</p> <p>Comments noted. Future updates of the Relevant Plans, Policies and Documents section will include consultation documents on national policy guidance.</p> <p>The borough's 2006 Retail and Leisure study is currently being updated after undertaking a more up to date household survey conducted around two years after the opening of Golden Square.</p>
CSSCOP/5	Mr David Hardman Asset Protection United Utilities	Flood protection is very important and risk can be reduced if the Planning Authority leads and the various agencies co-operate to manage the fate of surface water.	The importance of flood protection is recognised.
CSSCOP/10	Winwick Quay LLP Mr Richard Birchfield	We support the key sustainability issues that have been highlighted as those which will most readily affect the borough.	Support and comments noted.

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		<p>The protection of the vitality and viability of the Town Centre is of paramount importance to Warrington's position within the retail hierarchy. Ensuring that new retail development does not detract from the vitality and viability of the Town Centre fully accords with national and regional planning guidance and as such should be considered a key sustainability issue for the borough.</p> <p>However, given the proposals put forward in the draft PPS6 revisions, the issue of "impact" on the town centre should be considered when determining new retail and leisure proposals. This will also accord with the principles of marrying opportunity and need as advocated within The North West of England Plan.</p>	



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