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Client	South Warrington Parish Councils Local Plan Working Group (SWP)
Document Title	Statement of Case
Version/Date	V1 3 Feb 2023
GTP ref	2301001
PINS ref	APP/0655/V/22/3311877
Application reference	2019/34799
Appellant	Langtree PP and Panattoni
Site	Land to the west of Junction 20 of the M6 Motorway, and Junction 9 of the M56 Motorway and to the south of, Grappenhall Lane/Cliff Lane (known as Six:56 Warrington) Grappenhall, Warrington

1 Introduction

- 1.1 This statement sets out the case for the South Warrington Parish Councils (SWP) in their objection to the proposed development of 98 ha of Green Belt at Grappenhall Lane and Cliff Lane in South Warrington
- 1.2 The South Warrington Parish Councils came together in reaction to a Preferred Development Options Paper issued by Warrington BC in July 2017 in respect of review of the February 2015 Warrington Local Plan Core Strategy. The PDO promoted the removal of large areas of land from the Green Belt around South Warrington for residential and employment related development.
- 1.3 The Parishes of Appleton, Grappenhall and Thelwall, Hatton, Lymm, Stretton and Walton have committed to present unified representations to the emerging local plan.
- 1.4 Whilst the emerging local plan has been under consideration two major proposals for distribution related development have emerged. The development which is the subject of this inquiry is one. Applications submitted jointly by Liberty Properties Development Ltd and Eddie Stobart Ltd, the second. The Liberty/ESL proposals relate to land which shares a boundary with the Six/56 site and effectively makes up the employment allocation in the emerging local plan known as the South East Warrington Employment Area (SEWEA). In response to public concern the SWP has mandated to engage in presenting objection to development on both of these sites.
- 1.5 The PDO attracted 4000 plus representations, and a scale of local concern which clearly merited SWP engagement in the process of determination of related

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applications for planning permission including that which has become the subject of this inquiry.

1.6 SWP has consequently and subsequently made representations at each stage of the Local Plan process, including appearances at the Local Plan Examination which took place in September and October 2022.

1.7 Objections were tabled in opposing two applications made by Liberty/ESL. One application was refused and the subject of an appeal, the other recommended for approval by the Council and called in for determination by the Secretary of State. SWP appeared as a Rule 6 Party at the Inquiry which considered the appeal and application concurrently.

1.8 SWP first commented on the Six/56 proposals in June 2019 (WBC ref 2019/34799). Determination did not proceed – no reasons for delay have ever been publically explained.

1.9 SWP were advised that the application was to be considered by WBC Development Management Committee on 10 March 2022. Again there was no logical reasoning presented as to why the application came forward for determination at that point. SWP became aware that the appellant had been afforded the opportunity to present the proposals to members of the Committee in a closed meeting which excluded ward councillors and the public. Whilst SWP acknowledges this matter to be of limited relevance to this Inquiry, the matter will inevitably be highlighted by members of the public who will express concern that the determination of the application was driven by corporate objectives rather sound planning considerations.

1.10 Throughout the process of consideration of the application SWP has been in correspondence with the Secretary of State and the National Planning Case Unit seeking to ensure that the matter was considered outwith the local planning authority given the level of objection, the extent to which the development impacted on the Green Belt and the wider strategic significance of the proposed development.

1.11 Whilst the Secretary of State initially responded to referral by the LPA with a letter which indicated that there would be no intervention it was understood that this was issued in error. Subsequent correspondence directed the Council not to determine the application and then indicated that the matter would be decided by the Secretary of State.

1.12 SWP requested to be afforded Rule 6 status at this Inquiry. This status was granted through correspondence with PINS dated 10 January 2023.

1.13 It is regrettable that the Council has seen fit to provide only limited engagement with the Inquiry. This results in SWP providing the only means of challenge to the case presented in support of the development by the appellant.

2 South Warrington Parish Council – Key considerations

2.1 The SWP has consistently raised issue with proposals to bring development to land which has come to be known as the SEWEA. The position has been reflected in representation made to the Council and to Inspectors advising the Secretary of State in respect of planning applications and the emerging local plan.

2.2 The key areas of concern have and continue to cover the following topics

- Sustainability

- Prematurity
- Green Belt and very special circumstances
- Transport and infrastructure
- Heritage
- Landscape and visual impact
- Air quality
- Cumulative Impact

3 Relevant Policy Considerations

3.1 There is no specific contention over which policies are relevant to the determination of the application.

3.2 The Council has presented the application to its Development Management Committee on two occasions – 10 March 2022 and 1 February 2023. Section 8 of the March 2022 report lists the following policy considerations.

National Planning Policy Framework

3.3 The Revised NPPF (2019) confirms that decisions should apply a presumption in favour of sustainable development. Paragraph 7 of the document states that the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. This is balanced by Paragraph 9 which states that plans and decisions need to take local circumstances into account, so that they reflect the character, needs and opportunities of each area.

3.4 The NPPF also includes sections relating to the Green Belt, Building a Strong and Competitive Economy, Promoting Sustainable Transport, Making Effective use of Land, Conserving and Enhancing the Historic Environment, and Conserving the Natural Environment.

3.5 The development plan in this case consists of Warrington Local Plan Core Strategy and the Appleton Parish Thorn Ward Neighbourhood Plan.

Relevant Policies in the Local Plan Core Strategy

CS1 – Delivering Sustainable Development

CS2 – Quantity and Distribution of Development

CS4 – Transport

CS5 – Green Belt

PV3 – Strengthening the Borough's Workforce

SN7 – Enhancing Health and Wellbeing

QE1 – Decentralised Energy Networks and Low Carbon Development

QE3 – Green Infrastructure

QE4 – Flood Risk

QE5 – Biodiversity and Geodiversity

QE6 – Environmental and Amenity Protection

QE7 – Ensuring High Quality Place

QE8 – Historic Environment

MP1 – General Transport Principles

MP3 – Active Travel

MP4 – Public Transport

MP5 – Freight Transport

MP7 – Transport Assessment and Travel Plans

MP8 – Waste

CC2 – Protecting the Countryside

Relevant Policies in the Appleton Parish Thorn Ward Neighbourhood Development Plan (adopted 2017)

AT - D1 – Design of Development in Appleton Parish Thorn Ward

AT - D2 – Protecting and Enhancing Local Landscape Character and Views

AT - D3 – Flood Risk, Water Management and Surface Water Run - off

AT - TH1 – Traffic Management and Transport Improvements

AT - TH2 – Sustainable Transport Measures

AT - E1 – New Local Employment Opportunities

Other Planning Policy and Guidance Documents

Planning Practice Guidance (PPG)

National Planning Policy for Waste (2014)

Design and Construction Supplementary Planning Document (2010; updated 2016)

Environmental Protection Supplementary Planning Document (2013)

Planning Obligations Supplementary Planning Document (2017)

Updated Proposed Submission Version Local Plan (2021)

Transport for the North Freight and Logistics Strategy

Other documents and Local Plan evidence base

Green Belt Assessment (GBA) 2016 and subsequent updates

Green Belt Site Selection – Implications of Green Belt Release (2021)

GBA Garden Suburb Options (2021)

Warrington Means Business (2020)

Economic Development Needs Assessment (2016 and 2021)

Landscape Character Assessment (2007)

Local Transport Plan (LTP) 4 (2019)

Warrington Updated Submission Version Local Plan

3.6 The submission version of the Local Plan was placed with the Secretary of State in April 2022.

3.7 The plan was considered at Examination by Inspectors in September and October 2022.

3.8 The Inspectors produced initial findings through correspondence with the Council dated 16th December 2022. Critically the Inspectors indicated that the plan could only be considered to be sound with a number of main modifications including the deletion of the SEWEA.

3.9 It is evident that this decision, together with the related evidence base considered at the Examination will be of clear material consideration to the Inquiry.

3.10 The following objectives and policies of the plan are relevant to the determination of this application

W1 Planning for Warrington's Economic Growth

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W2 Warrington's Green Belt

W4 Sustainable Travel and Transport/ Delivering Warrington's Infrastructure

Site Allocations

- South East Warrington Urban Extension – SEWUE
- South East Warrington Employment Allocation - SEWEA

DEV4 Economic Growth and Development

GB1 Warrington's Green Belt

INF5 Delivering Infrastructure

DC2 Historic Environment

MD2 SEWUE

MD6 SEWEA

4 South Warrington Parishes Statement of Case

4.1 The South Warrington Parishes seek the refusal of the application for planning permission which is the subject of this Inquiry.

Sustainability

4.2 SWP will contend that the determination of this application does not reflect the core provisions of the NPPF which notes the purpose of the planning system as contributing to the achievement of sustainable development. (NPPF para 7)

4.3 The NPPF notes the three interlinked objectives of the planning system to achieve sustainable development an economic objective, a social objective and an environmental objective. (NPPF para 8)

4.4 It is the SWP's case that these fundamental objectives are not achieved by the proposed development. In reaching his decision to refuse planning permission of logistics based development on land adjoining the application site to south Secretary noted the advice of his Inspector that this exercise of balancing economic, social and environmental benefits of development did not secure a position which sustainable development, as defined within the NPPF was achieved.

[APP/M0655/W/19/3222603 & APP/M0655/V/20/3253083 APPLICATION AND APPEAL MADE BY LIBERTY PROPERTIES & EDDIE STOBART LTD. LAND AT BARLEYCASTLE LANE APPLETON THORN, WARRINGTON APPLICATION REFS: 2017/31757 & 2019/34739] {The Liberty/Stobart Decision}

4.5 Following Examination of the Submitted Version of the Local Plan the Inspectors have written to the Council noting that plan is not considered to be sound and suggesting that in order to make it sound the SEWEA should be deleted. Whilst the Inspectors' letter does not make specific reference to the NPPF, the recommendation is clearly based on conclusion implementation of the plan and its specific allocations would not represent sustainable development in the context of NPPF Para 8

4.6 It must follow that the development now tabled, which represents more than 70% of the total area of the SEWEA cannot be considered to be sustainable development.

Prematurity

4.7 The Liberty/Stobart appeal considered the issue of prematurity, with the Inspector and Secretary of State concluding that there was no justification to argue that determination of application would prejudice the outcome the local plan process as it stood at that time – November 2020.

4.8 Circumstances have since changed and the status of the emerging Local Plan has moved on since that previous decision.

4.9 The status of the emerging Local Plan and the timing of this Inquiry raise issue in this regard.

4.10 As noted above the Local Plan has been through an examination process and Inspectors have prepared an initial report. That report concludes that the plan is not sound in the form that it was submitted to the Secretary of State. Main modifications would be needed enable the tests of soundness to be satisfied. The principal main modification would require the deletion of policy MD6 and the deletion of the SEWEA in its entirety.

4.11 Paragraph 49 of the NPPF notes the limited circumstances when prematurity may justify refusal to grant planning permission. Paragraph 49a notes that where development proposed is so substantial, or its cumulative effect would be so significant, that to grant planning permission would undermine the plan making process by predetermining decisions about the scale, locations or phasing of new development that are essential to an emerging plan.

4.12 The provisions of paragraph b) which must be met alongside the provisions of paragraph a) require the emerging plan is at an advanced stage but is not yet formally part of the development plan.

4.13 It is the position of the SWP that both limbs of paragraph 49 are met. The SEWEA is of a significant size and of strategic importance. Its inclusion or deletion from the emerging plan is of major consequence as recognised in the Inspectors' interim report.

4.14 Whilst the SWP disagrees with Borough Council's decision to not engage fully in the Inquiry process. Scrutiny of the report to Development Management Committee (DMC) which set out the Council's position would appear to suggest that the Council accepts that determination of this application at this stage would be premature and compromise the local plan process.

4.15 At paragraph 1.24 of the information report to the meeting of the DMC on 1st February 2023 the Council seems to accept that the outcome of this Inquiry may occur before deliberation of further stages of the local plan process. This would seem to be the very position envisaged in the NPPF.

4.16 It is of considerable concern to the SWP that to those residents which they represent will see no logic in reaching a decision on this application which invalidates any decision made through the local plan process. The local plan process should be allowed to reach a conclusion to establish clear and appropriate parameters for the development of the Six/56 site or to conclude that any decision to allocate employment land in this location is fundamentally flawed.

Green Belt

4.17 It is clear that notwithstanding copious evidence presented to the Local Plan Examination, that the Inspectors have agreed with the standpoint that land which includes the application site makes a significant contribution to the purposes of Green Belt designation.

4.18 At paragraph 27 of their letter of 16th December 2022 the Inspectors note:

"The site for the proposed SEWEA is located immediately to the east of the Appleton Thorn Trading Estate, Barleycastle Trading Estate and Stretton Green Distribution Park which are inset within (excluded from) the Green Belt. However, it is separated from the urban area of Warrington by significant areas of open countryside which are also within the Green Belt. In terms of the purposes of the Green Belt, the primary role of the site in its current form is to assist in safeguarding the countryside from encroachment. The site is bounded to the south by the M56, the east by the M6 and the north by the B5356 and so the allocation could create strong, permanent Green Belt boundaries. Nonetheless, the scale and extent of the site and the development proposed on it would involve a substantial incursion into largely undeveloped and open countryside. It would represent significant encroachment into the countryside."

4.19 At paragraph 28 it is noted that:

"The site is largely flat with limited internal and boundary vegetation, and therefore has a high degree of openness. Such visual openness would be lost to development on a considerable scale, accommodating very large buildings and associated vehicles. The visual harm to the openness of the Green Belt would be severe."

4.20 At paragraph 30 it is concluded that development would result in:

"..a significant encroachment into the countryside, undermining one of the purposes of the Green Belt and would cause severe harm to the openness of the Green Belt. It would also have a significant adverse effect on the character and appearance of the area. Whilst there would be economic benefits as a result of the

allocation, these do not outweigh the above concerns. Exceptional circumstances to alter the Green Belt in this case do not exist."

4.21 SWP presented Hearing Statements on both Green Belt in general and SEWEA to the Local Plan Examination. It is pleasing that the position of SWP is so closely reflected in the Inspectors' comments and provides so adequately for the SWP Case on Green Belt Grounds.

Very Special Circumstances

4.22 It is clearly the contention of the applicant and the basis for the decisions made by the Council, that the development proposed can be justified by the very special circumstances advocated with paragraph 147 of the NPPF.

4.23 Paragraph 148 notes that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness will, and any other harm resulting from the proposal is clearly outweighed by other consideration.

4.24 It is submitted by SWP that the proposed development fails this test and that the substantial harm to the openness and functions of the Green Belt and other material considerations weighs heavily against the grant of planning permission.

4.25 Both the applicant's submissions made with the application and the Council's decision in 2022 to indicate that they are minded to grant planning permission are based on the economic benefit of the development.

4.26 This decision has subsequently been found to be flawed as now the Liberty/Stobart Inspector, the Secretary State and now the Local Plan Inspectors have found reason to conclude that any potential benefit accruing from the development fails to outweigh harm to the Green Belt.

4.27 The Council in concluding that they were minded to support the proposed development, placed undue weight the then untested position of the Economic Development Needs Assessment which had been prepared as the evidence base for the Local Plan.

4.28 It can be noted from the SWP representations on the Local Plan and the Hearing Statement on Economic Development that the reliability of the EDNA has consistently been questioned. It is now clear, as evidenced in the Local Plan Inspectors' conclusions that questions over its conclusion are valid. The Council's basis for concluding that there are very special circumstances, or exceptional circumstances for Green Belt release are not justified.

4.29 SWP have consistently raised issue with the rationale behind the EDNA. The document was driven by the now dated Cheshire and Warrington LEP Strategic Economic which was reflected in the approach taken by Warrington &Co the Council's development arm which produced Warrington Means Business a document presented as supporting the growth agenda of the SEP. Neither body is wholly democratically accountable and has a mandate to promote development irrespective of planning decisions.

4.30 Both the LEP and Warrington &Co include developers and property companies, including Langtree amongst its membership.

4.31 SWP concern is not over the potential advantages of securing commercial acumen to assist in decision making, but the over reliance of WBC on documents based largely on the ambitions of such bodies.

4.32 Unlike other parts of Cheshire, the role for Warrington indentified in the SEP was to establish city status, with no clear logic as to how this would promote

or support growth and to build on its strategic location to support logistics based development.

4.33 It is perhaps unfortunate that Warrington does not employ a Chief Planning Officer, with senior planning officers answerable to the Director of Growth in whose name planning reports are issued.

4.34 Changes in circumstances since the EDNA was first presented include Brexit, Covid and latterly the Russian invasion of the Ukraine. There have been later updates and amendments to the EDNA but it has remained a document driven by aspirational levels of growth.

4.35 The applicant's say that development will bring lots of money into the local economy – possible £216m per annum. There is no absolute method to calculate such a figure. To their credit Council officers tested the numbers and engaged their own consultant prior to determination of the application. Reading of the information provided suggests that the Warrington consultant produces a figure one third of that indicated by the applicant. A difference of £148 million per annum – 30% less than the applicant's prediction

4.36 It might be expected that development of the exceptional scale proposed would bring exceptional benefits. The Liberty/Stobart proposal at Barleycastle Lane and a proposal at Haydock – both Green Belt and both justified on the basis of economic benefit were both dismissed on appeal because the benefits were insufficient to outweigh Green Belt policy objection. Yet it would appear both of these schemes delivered more benefit than that quoted in this case.

4.37 In terms of employment numbers – that absence of information about possible users makes any numbers quoted speculative.

4.38 A table produce in the officer report of March 2022 is of value. Officers analyse which compares two sets of figures from alternative advisors. The applicant says that the operation of the site will produce 4113 jobs. Warrington's consultant says 2989. Perhaps of even greater interest is the net FTE's actual new jobs in the local economy where the applicant says that of the 4000 plus jobs on the site less than 2000 will be new. Warrington's consultant says this number is likely to be 1412.

4.39 The applicant suggests that 50% of jobs created would be taken up by Warrington residents, so that might mean just over 700 new jobs? The Stobart appeal considered 40% 565 jobs.

4.40 There is no argument that any new job should be welcomed, but in this case decision makers are being asked to weigh economic and employment benefits against the massive impact of this development – where Green Belt objection must be “clearly outweighed”.

4.41 The applicants and the Council in their analysis of the application rely on a number of issues which are presented as very special circumstances. These matters are presented as having weight in the planning balance which might support the grant of planning permission.

- Need
- Lack of alternative sites outside the Green Belt
- Deliverability of the application proposals
- Delivering socio- economic benefit
- Ecology benefits
- Transportation benefits

4.42 For the reasons highlighted in the preceding paragraphs it will be the SWP's contention that argument that economic benefit and need can no longer secure the weight attributed by the applicant and the Council in the context of the Local Plan Inspectors' comments.

4.43 The following paragraphs seek to raise issue over a range of other material considerations which add further weight to objection to the proposed development.

Transport and infrastructure

4.44 It has been noted above that the Six/56 development effectively represents more than 70% of the total land take of the SEWEA. It is curious in that context how the Council concludes on the one hand that the SEWEA can only be developed in the context of an interlinked range of highway and infrastructure improvements and the implementation of the provisions of the Local Transport Plan 4 adopted in 2021 and yet sanction the approval of the proposed development on a far less complex and set of highway and infrastructure improvements.

4.45 The Local Plan examination exposed fundamental weaknesses in the delivery of key components of the Infrastructure Delivery Plan presented within the evidence base which supported the Local Plan. This particularly relates to the proposed Western Link Road which the Council has always presented as a means of opening up development opportunities and contributing to the resolution of long standing and severe traffic problems in South Warrington. The Hearing Statement of to the Local Plan Examination explains the wider concerns of SWP.

4.46 As it stands it considered that LTP4 is undeliverable. Even if that is not the case key components are only expected to come on stream in the 2040's

4.47 SWP has consistently raised issue over the development of an urban extension or a new "Garden" village in South Warrington, but in reality such a comprehensive, plan led approach would be the only viable means of securing adequate levels of infrastructure to serve the massive scale and concentration of development proposed.

4.48 A key criticism, highlighted by SWP at previous examinations and the Local Plan examination has been the lack of understanding of the local highway network. Excluding the M6 crossing of the Mersey and the Manchester Ship Canal via the Thelwall Viaduct – all other traffic has to rely on 3 swing bridges across the Ship Canal and two across the Mersey. The network is uniquely constrained as a consequence. The swing bridges date from the Victorian era when the Ship Canal was constructed yet they remain operational allowing shipping to reach Port Salford.

4.49 It would appear from review of the Hearing Statements of other parties, including developers that concern over the adequacy of infrastructure is shared by a range of parties with differing interests by common views in this regard.

4.50 Evidence presented in support of the Liberty/Stobart applications included analysis of the source of existing employees on the Stretton Industrial Estate. It was recognised that more than 60% of staff travelled from outside Warrington. This might prove to be acceptable if the application site was close to centres of population in adjoining boroughs. In reality it is remote from residential populations in Halton, St Helens, Wigan and Salford.

4.51 Rather than several hundred employees the development now proposed would, according to the applicants submissions attract several thousand staff.

4.52 It was noted that witnesses appearing for the applicants at the Local Plan Examination indicated a different model for the use of warehousing on the site than that which was previous presented with the application. The focus of attention of transport analysis by both the developer and the Council has always focused on HGV movements onto a part of the highways network which is recognised as operating beyond capacity. The Local Plan Examination was told about a model where HGVs delivered to the site, to offload onto smaller vehicles. The location of the site meant that electric LGVs could reach into the Merseyside and Greater Manchester conurbations from a central South Warrington base.

4.53 LGVs would be able to use parts of the network which are inaccessible to HGV's either through practicalities or statutory restrictions. Existing issues with rat running via country lanes would be exacerbated

4.54 The implication of such a model would mean more light goods vehicles using the local highway network in order to avoid pinch points on the motorway network. For example, travelling through Appleton Thorn and Stretton to reach junction 10 of the M56 or crossing Warrington to reach junctions 7 and 8 of the M62 avoiding the busy M6/M56 junction – junction 21A/9. It is not clear as to the extent to which this pattern of vehicle movements has been incorporated into transport modelling.

4.55 Since the closing of the Local Plan Examination Transport for the North has published a Freight and Logistics Strategy in November 2022. This report does not avoid the issue of need for access to an operational strategic highway network but

recognises that many of the issues which are identified are best resolved through model shift on to the railway network.

- 4.56 It is recognised that this is a challenging objective, but the construction of massive distribution centres with no option other than to use road based transport appears to be inconsistent with the objectives of the TfN report.

“if TfN were to support investment in new warehousing through policy and other interventions as a stand-alone initiative this would risk only entrenching existing highway freight modal dominance. Therefore, we will work with Local Authorities in support of greater logistics warehousing but also seek that such warehousing should, by default, be also rail connected where possible”.

Heritage

- 4.57 The proposed development pays insufficient regard to the scheduled monument at the centre of the site. The illustrative master plan shows the heritage asset located next to a roundabout at the centre of the road network within the development. It is otherwise enclosed by the largest buildings on the site, related hard standing and car parking. The proposed development is for a logistics centre. It is not for a highly landscaped, visually attractive science park. Review of any equivalent facility, including those existing on adjoining sites, amply demonstrates the inevitable appearance of areas in this form of use. The Council has expended considerable effort in protecting the setting of scheduled monuments elsewhere in the Borough and has resisted development in the Green Belt in North Warrington largely on the basis of a battlefield designation. The grant of planning permission on this site would be inconsistent with approach applied elsewhere.

4.58 Council officers in their report of March 2022 accept that the residual impact of the development on the Scheduled Monument is moderate adverse. Whilst this qualification of impact is understood in terms of a planning balance, the test required by the NPPF is different. The Council's officers do not reach a conclusion on this point merely repeating the position established by the applicants in their ES

4.59 The applicants describe the impact as insignificant as a consequence of the proposed landscaping treatment and improved public access. The impact of the development is substantial. It is not mitigated by landscape and other treatment and is not justified by any benefit of the proposed development.

4.60 The SAM is surrounded by tall featureless buildings removing any semblance of the historic setting for the Hall and its moat.

4.61 Even if it is accepted that impact on the heritage asset is less than significant paragraph 201 of the NPPF requires that harm to be weighed against public benefit. The conclusion reached by the Local Plan Inspectors question the extent of the benefit. They conclude that there are insufficient exceptional circumstances to justify the release of Green Belt. There is no public benefit through as need for the development is not proven. There is considerable disbenefit arising from the impact on openness and the visual impact of the development.

4.62 There are other moated sites in Warrington. One, also a scheduled ancient monument is located at also known as Bradlegh Old Hall in Winwick. The description of the listing of both sites as Schedules Ancient Monuments are similar.

Bradley Hall Moated Site Grappenhall Lane

Around 6,000 moated sites are known in England. They consist of wide ditches, often or seasonally water-filled, partly or completely enclosing one or more islands of dry ground on which stood domestic or religious buildings. In some cases the islands were used for horticulture. The majority of moated sites served as prestigious aristocratic and seigneurial residences with the provision of a moat intended as a status symbol rather than a practical military defence. The peak period during which moated sites were built was between about 1250 and 1350 and by far the greatest concentration lies in central and eastern parts of England. However, moated sites were built throughout the medieval period, are widely scattered throughout England and exhibit a high level of diversity in their forms and sizes. They form a significant class of medieval monument and are important for the understanding of the distribution of wealth and status in the countryside. Many examples provide conditions favourable to the survival of organic remains.

Bradley Hall moated site survives well and is a good example of a moated medieval manor house. The moat itself survives in good condition and remains water filled, thus conditions suitable for the preservation of organic materials are considered to exist here. Remains of two earlier building phases of Bradley Hall will survive beneath the present house and gardens.

Details

The monument comprises a moated site, the island of which is partially occupied by a modernised farmhouse and garden but which was formerly occupied by the manor house of Bradley Hall. The island measures c.70m x 55m and is grass covered where not overlain by the house and garden. It is surrounded by a waterlogged moat c.10m wide x 2.5m deep that has been landscaped on the E side to form an ornamental pond. Access to the island is via a causeway on the E side close to the NE corner that replaced an earlier drawbridge. A secondary access point on the E side has been incorporated into the garden landscaping where the moat has been dammed to form the ornamental pond. Two sets of steps, one in the S arm and one in the W arm, lead down from the island into the moat. The

original Bradley Hall occupied the site in the early 14th century. It was rebuilt in 1460 and again in the 17th century, and has been considerably altered since. Bradley Hall and its associated outbuildings, the access drive, all fences and hedged field boundaries, and a telegraph pole are excluded from the scheduling. The ground beneath these features, however, is included.

Bradlegh Old Hall and Moat Winwick

Around 6,000 moated sites are known in England. They consist of wide ditches, often or seasonally water-filled, partly or completely enclosing one or more islands of dry ground on which stood domestic or religious buildings. In some cases the islands were used for horticulture. The majority of moated sites served as prestigious aristocratic and seigneurial residences with the provision of a moat intended as a status symbol rather than a practical military defence. The peak period during which moated sites were built was between about 1250 and 1350 and by far the greatest concentration lies in central and eastern parts of England. However, moated sites were built throughout the medieval period, are widely scattered throughout England and exhibit a high level of diversity in their forms and sizes. They form a significant class of medieval monument and are important for the understanding of the distribution of wealth and status in the countryside. Many examples provide conditions favourable to the survival of organic remains.

The monument is a well preserved example of the site of a late medieval moated manor house. The monument retains its original 15th century gateway and considerable evidence of the original Bradlegh Old Hall will survive beneath the present house and gardens. Additionally the waterlogged moat and fishpond will preserve organic material.

The monument is the moated site of Bradlegh Old Hall and its fishpond. The site includes a rectangular island c.58m x 52m upon which stands Bradlegh Old Hall and its outbuildings, a 15th century sandstone gatehouse through which the driveway passes to the Hall, and well tended lawns and shrubs. Surrounding the island is a waterlogged moat averaging c.12-14m wide x 1.4m deep. Water feeds into the W arm via a pipe and exits by an outlet pipe in the E arm. Along the W half of the N arm the outer scarp has been given a shallower batter to measure c.25m across at this point. Access to the island is across the N arm via a modern

causeway leading to the gatehouse that replaced an earlier stone bridge. A short distance to the W of the moat is a narrow L- shaped fishpond - its N arm measuring c.60m long x 8m wide, and its W arm measuring c.30m long x 8m wide before opening out at its S end into a sub- rectangular dry hollow c.20m x 14m x 1.5m deep. Bradlegh Old Hall was originally a 15th century moated manor house of which only the gatehouse and moat remain. The present building is late 16th century incorporating earlier features. The hall and gatehouse are both Listed Buildings Grade II. Bradlegh Old Hall, its outbuildings and service pipes; the gatehouse, driveway and sandstone flanking walls the modern causeway; the moat inlet and outlet pipes; an oil storage tank, all fences, flagged areas, and an ornate timber feature on the E lawn, are all excluded from the scheduling. The ground beneath all these features, however, is included. The monument includes two separate protected areas.

4.63 The Winwick site has in the past been included on the Council's "At Risk" register and recognised as a heritage asset in need of protection. The Grappenhall Lane site has not been afforded similar recognition. There does seem to be inconsistency in the Council's approach to the protection of similar assets.

4.64 The development is inconsistent with the requirements of QE8 of the development plan and fails to follow the required approach of section 16 of the NPPF.

4.65 The Inspectors' report of 16 December 2022 notes the following

The site for the proposed SEWEA is located immediately to the east of the Appleton Thorn Trading Estate, Barleycastle Trading Estate and Stretton Green Distribution Park which are inset within (excluded from) the Green Belt. However, it is separated from the urban area of Warrington by significant areas of open countryside which are also within the Green Belt. In terms of the purposes of the Green Belt, the primary role of the site in its current form is to assist in safeguarding the countryside from encroachment. The site is bounded to the south

by the M56, the east by the M6 and the north by the B5356 and so the allocation could create strong, permanent Green Belt boundaries. Nonetheless, the scale and extent of the site and the development proposed on it would involve a substantial incursion into largely undeveloped and open countryside. It would represent significant encroachment into the countryside.

Considering the landscape and visual impacts of the allocation more broadly, the overriding character of this area is as part of Warrington's rural hinterland. This is somewhat undermined by the existing warehouse and industrial developments to the west, and the motorways to the south and east. However, the scale and form of the development proposed would be transformative in nature, substantially expanding the industrial character of the adjacent area. Furthermore, the site is located on part of the highest land in the Borough, which then gradually descends northwards towards a central band of low lying, reasonably level land. Whilst tree planting could assist with mitigating visual impacts, it is likely that development on the scale proposed would cause substantial visual intrusion, particularly when viewed from roads and public rights of way to the north. It would have a significant adverse effect on the character and appearance of the area.

4.66 To understand the scale of the development in the context of the semi-rural edge of Warrington it is useful to consider some comparisons.

4.67 The 98ha site can accommodate 43 Warrington Wolves Rugby Stadia. The existing Stretton Airfield and Barleycastle Industrial Estates cover a combined area of 70ha.

4.68 Excluding church steeples the proposed warehouse buildings would be the highest buildings in Warrington. The warehouse buildings would match the height of residential blocks close to the town centre, but would sit at the highest point of the Borough at the top of the escarpment when ascends from the floor of the Mersey Valley to a height of 60m AOD on Grappenhall Lane.

4.69 Views back across the valley towards Winter Hill and the northern towns of the Greater Manchester conurbation are illustrative of the extensive visual impact of the site.

Air quality

4.70 SWP and its constituent Parish Councils have consistently expressed concern on matters relating to air quality. The core substance of this concern is highlighted in the Local Plan Examination Hearing Statement.

Cumulative Impact

4.71 The impacts of the Six/56 need to be considered in the context of wider cumulative impact. There is inevitability that the grant of planning permission for this development would encourage and support applications for planning permission on land around junction 20 of the M6. It is evident from the input of landowners and potential developers into the Local Plan Examination that there is already interest in the development of land within the Green Belt to the north and north east of the application site.

5 Conclusions

5.1 It is the SWP case that the application represents inappropriate development in the Green Belt. There is considerable degree of other harm resulting from the

proposal. There are no very special circumstances such as would clearly outweigh objection to the proposal on this basis.

6 Documents

- Appendix 1 Warrington BC Local Plan Submission Version April 2022
- Appendix 2 Appleton Thorn Ward NDP
- Appendix 3 SWP representations to Draft Local Plan
- Appendix 4 SWP Hearing Statements
 - Spatial Strategy
 - Economic Growth and Development
 - SEWEA
 - Transport and Infrastructure
 - Air Quality
- Appendix 5 Appeal decision *APP/M0655/W/19/3222603* & *APP/M0655/V/20/3253083* Liberty Properties and Eddie Stobart Ltd Barleycastle Lane Appleton Thorn Application refs *REFS: 2017/31757 & 2019/34739]*
- Appendix 6 SWP representations to application 2019/34799
- Appendix 7 WBC original committee report and subsequent update
- Appendix 8 Inspectors' Post Examination letter 16 December 2022
- Appendix 9 Transport for the North Freight and Logistics Strategy November 2022