Intermodal Logistics Park North Ltd

# INTERMODAL LOGISTICS PARK NORTH (ILPN)

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## Intermodal Logistics Park North (ILPN) Strategic Rail Freight Interchange (SRFI)

**Project reference TR510001**

## Preliminary Environmental Information Report (PEIR)

## Appendix 12.1: Built Heritage Response to PINS Scoping Opinion

**October 2025**

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**Planning Act 2008**

**The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017**

## This document forms a part of a Preliminary Environmental Information Report (PEIR) for the Intermodal Logistics Park North (ILPN) project.

A PEIR presents environmental information to assist consultees to form an informed view of the likely significant environmental effects of a proposed development and provide feedback.

This PEIR has been prepared by the project promoter, Intermodal Logistics Park North Ltd. The Proposed Development is described in Chapter 3 of the PEIR and is the subject of a public consultation.

## Details of how to respond to the public consultation are provided at the end of Chapter 1 of the PEIR and on the project website:

## https://www.tritaxbigbox.co.uk/our-spaces/intermodal-logistics-park-north/

This feedback will be taken into account by Intermodal Logistics Park North Ltd in the preparation of its application for a Development Consent Order for the project.

**To: Historic England; St Helens Council (Conservation – Growth Lancashire); Wigan Council (Conservation); Warrington Council (Conservation)**

**From: Iceni Projects Built Heritage Team**

**Date: 25th April 2025**

**Title: Proposed Intermodal Logistics Park North_Built Heritage Response to PINS Scoping Opinion**

## 1. Introduction

This document responds to the Scoping Opinion (the 'Opinion') provided by the Planning Inspectorate on 12th December 2024, relating to the proposed Intermodal Logistics Park North Rail Freight Interchange (the 'Proposed Development') on land to the east of Newton-le-Willows, in the jurisdictions of St Helens and Wigan Councils.

This document addresses feedback presented by the Opinion relating to the proposed scope of the built heritage assessment to be included within a forthcoming Environmental Statement ('ES'). It responds to the Opinion's request for clarification and additional justification regarding the proposed scope of assessment and is intended to inform a final scope and methodology to be taken forward in the Preliminary Environmental Impact Report ('PEIR'). This additional information is set out within the Note for agreement with heritage consultees, where relevant.

The proposed scope of assessment and assessment methodology was mostly accepted by the Scoping Opinion and responses to Non-Statutory Consultation. Only a couple of queries were raised, namely requesting further clarification, as follows:

- The valuation of heritage assets in the proposed assessment methodology was queried.
- Further reasoning for the lack of visibility between the Bowl Barrow West of Highfield Lane (Scheduled Monument) and the Proposed Development was requested to be part of the future ES assessment.
- Demonstration of the unlikeliness of significant effects to heritage assets within a wider 3km study area was requested to be part of the future ES assessment.

## 2. Overview of the Scoping Opinion and Written Response

**Heritage Assessment Methodology**

The Opinion queried the proposed heritage assessment methodology with regards to the valuation of heritage assets.

Specifically, the Opinion suggested that, *'Table 11.1 should identify non-statutory designated sites such as Registered Parks and Gardens and Registered Battlefields'*.

The Opinion also suggested that clarity, *'on how non-designated heritage assets that are not in a poor state of preservation would be valued'.*

Finally, the Opinion suggested that, *'Grade II Listed Buildings should be afforded the same value (high) as other nationally designated sites in the methodology'*.

In response to the Opinion's comments regarding the proposed heritage methodology, Table 11.1 (Sensitivity Classification) has been updated as below.

| Heritage Value | Designation of Receptor |
|---|---|
| Very High<br>(i.e. International) | Site acknowledged of international importance / World Heritage Site |
| High<br>(i.e. National) | Grade I or Grade II* Listed Asset (including Listed Building and Registered Park & Garden) / Scheduled Monument / Registered Historic Battlefield |
| Medium<br>(i.e National) | Grade II Listed Asset (including Listed Building and Registered Park & Garden) / Conservation Area |
| Low<br>(i.e. Local) | Non-Designated Heritage Assets of higher local importance (including local listing) |
| Very Low<br>(i.e. Local) | Non-Designated Heritage Assets of lower local importance or compromised by poor preservation |

Table 11.1 Sensitivity Classification

It should be noted that, contrary to the Opinion's suggestion that Grade II listed buildings should be valued as 'high', it is proposed to retain the initial valuation of these assets as 'medium'. Table 11.1 seeks to differentiate the relative sensitivity of assets in ES terms only and does not challenge the nationally designated status of Grade II listed buildings in legislation and policy terms.

Historic England identifies Grade I and Grade II* listed buildings as respectively possessing '*exceptional interest'*, making up 2.5% of all listed buildings, and '*of more than special interest'*, collectively making up 5.8% of all listed buildings. Grade II listed buildings make up 91.7% of all listed buildings and are identified by Historic England as possessing, '*special interest'*. The classification of Grade II at 'medium' value reflects Historic England's approach to grading the sensitivity of such designated assets.

The proposed differentiation between 'medium' and 'high' heritage value as set out in Table 11.1 is also reflected in NPSNN para.5.219, where substantial harm should be *'exceptional'* for Grade II and *'wholly exceptional'* for Grade I and II*. Therefore, the Applicant believes that the use of 'medium' is considered appropriate in ES terms to allow for differentiation of Grade II from Grade I and II* which are of higher relative importance in policy terms. We also believe it is appropriate to differentiate international designations (i.e. WHS) as 'very high' due to their 'outstanding universal value'.

It is important to note that understanding value is primarily a descriptive exercise. However, guidance by IEMA, IHBC and CIfA identifies that 'importance' can be defined and scaled as 'high', 'medium' or 'low' or any other simple scale that offers a form of gradation. For the purposes of this assessment, 'importance' is considered to be synonymous with 'sensitivity'. As such, designation is an obvious way of attributing sensitivity to heritage receptors, as set out in Table 11.1.

The Applicant confirms that valuation of assets set out in Table 11.1 is for EIA purposes only and this methodology has been accepted on other NSIPs assessments. This methodology would not conflict with the consideration of Grade II listed buildings as nationally designated heritage assets in line with relevant legislation and policy (see paras 11.52 – 11.55 of the Scoping Report). Policy tests remain relevant to an assessment of the Proposed Development. Notably, NPPF Paragraphs 212 - 215 remain relevant, and great weight will continue to be applied to the statutory duty where it arises, and any harm to significance will continue to require a clear and convincing justification.

**Scope of Assessment**

The Opinion requested that additional reasoning be provided to justify the proposed omission of certain heritage assets from the scope of the forthcoming ES.

Specifically, the Opinion stated that, *'provided the reasons for the lack of visibility between the [Bowl Barrow West of Highfield Lane (Scheduled Monument)] and the Proposed Development are set out in the ES, the asset can be scoped out of further assessment'.*

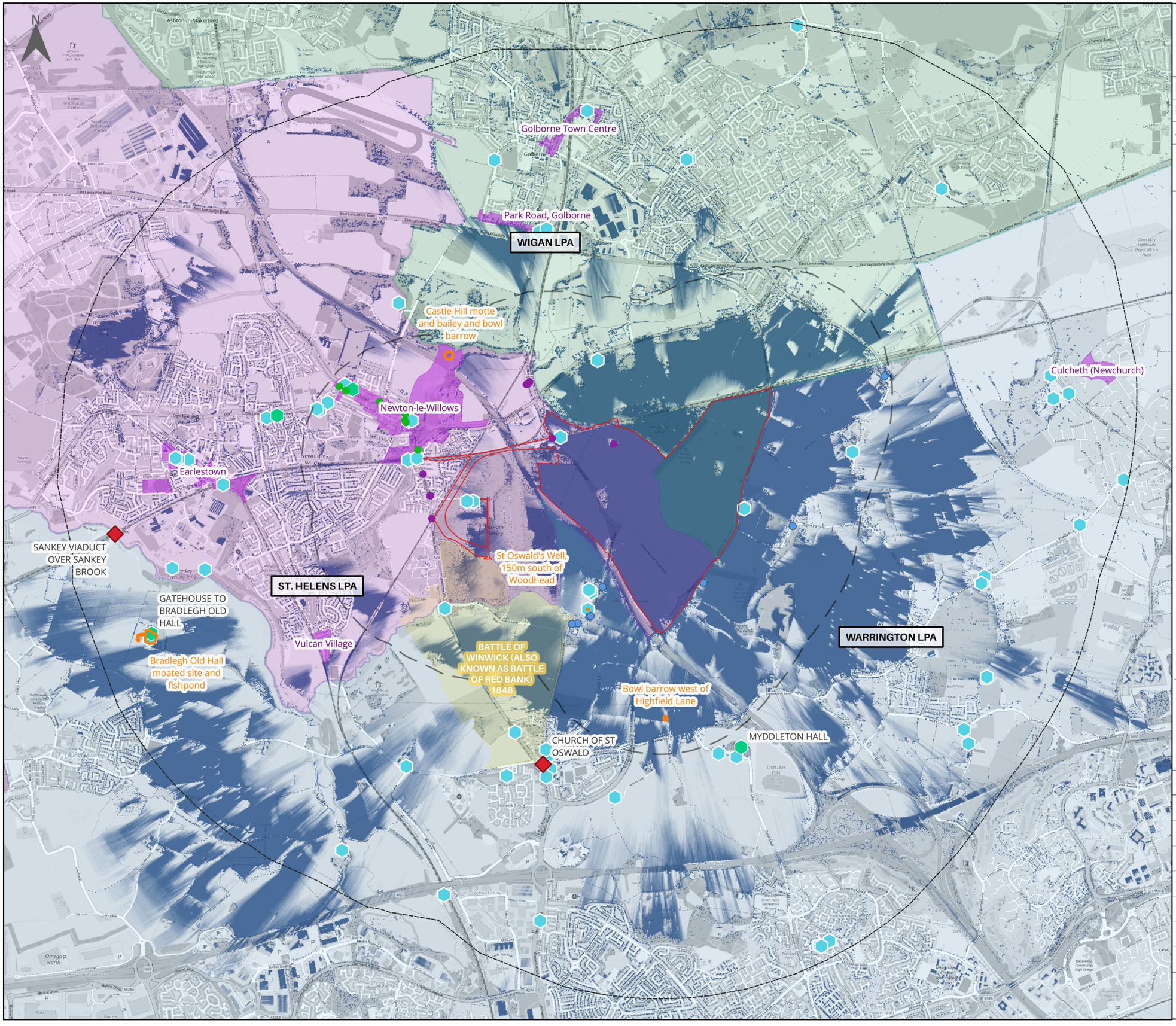
Similarly, the Opinion stated that, *'subject to confirmation in the ES, demonstrating that significant effects [to heritage assets within a wider 3km study area] are unlikely, the Inspectorate agrees to scope this matter out'.*

The heritage assets within a 3km study area are listed above and identified in Figure 1 (as shown within the Scoping Report and subsequent Topic Paper). Figure 1 also includes a Zone of Theoretical Visibility ('ZTV') based on the Proposed Development.[1]

The ZTV was prepared to understand the potential visibility of the Proposed Development and inform a scope of assessment for the forthcoming ES. The assets identified above are located within 3km of the DCO Site and are proposed to be scoped out of the forthcoming ES owing, in part, to their lack of intervisibility with the Proposed Development, suggested by ZTV analysis. As requested by the Scoping Opinion, additional reasoning for the proposed scoping out of such assets from the forthcoming ES, is provided below.

The assets located within 3km which are reviewed in detail are highly designated assets which are judged to potentially experience visibility of the Proposed Development. No, or very limited visibility of the Proposed Development is suggested by the ZTV to potentially be experienced within the context of all other assets located within 3km of the DCO Site. A preliminary review of these assets further suggests that they experience no historic relationship with the DCO Site and are therefore unlikely to be affected by the Proposed Development. As such, these assets have been scoped out of the forthcoming ES.

[1] The ZTV is modelled based on a height of 35m from the existing ground level to reflect the maximum height above ground of new built form proposed within the DCO Site. A 'worst-case' scenario has been modelled, assuming that buildings 35m tall will exist throughout the whole DCO Site. Existing vegetation and built development are considered by the ZTV.




# INTERMODAL LOGISTICS PARK (ILP) NORTH

| | |
|---|---|
| Date: | 22-01-2025 |
| Paper size: | A3 |
| Scale: | 1:30,000 |

0 500 1,000 m

Key:

- Site Boundary*
- 3km Buffer
- 1km buffer

*Note: Draft DCO Order Limits shown correct at the time of preparation of this document but since updated as shown in Figure 1.1

Designated Heritage Assets:

- Grade I
- Grade II*
- Grade II
- Conservation Areas
- Protected Battlefields

3km SMs

- Bowl barrow west of Highfield Lane
- Bradlegh Old Hall moated site and fishpond
- Castle Hill motte and bailey and bowl barrow
- St Oswald's Well

Non-Designated Heritage Assets:

- NDHAs
- St Helens Locally Listed Buildings
- Warrington Locally Listed Buildings

LPAs

- St. Helens LPA
- Warrington LPA
- Wigan LPA

Potential Visibility

- High Visibility
- Low Visibility

TRITAX BIG BOX

## Heritage Asset Map 3km with ZTV

| | |
|---|---|
| APFP Regulation: | N/A |
| Document Ref: | N/A |
| Drawing Number: | Figure 1 |
| Drawing Status: | INFORMAL CONSULTATION |
| Revision: | 01 |
| Drawn by: | GM |
| Approved by: | GF |

Bowl Barrow West of Highfield Lane, Scheduled Monument

The Scheduling entry for the asset suggests that it derives significance from its condition, which *'survives reasonably well'* and its contents, which archaeological investigation have evidenced to remain in-situ. The asset's setting is considered to make a lesser contribution to its significance when compared to its surviving historic fabric, for the following reasons:

- Some significance is derived from the asset's immediate situation amongst an open, green space; however,
- More widely, the asset's setting is characterised by the area's continuous change, having been developed by field systems, railway infrastructure and modern roadways, including the M6. The asset's lack of physical and visual inaccessibility from the public realm limits the contribution of this wider setting to its significance.

As set out within the Scoping Report, there are no above ground features of the DCO Site that contribute to an understanding or appreciation of the significance of this asset.

The ZTV suggests that the Proposed Development will likely be experienced in the background of long-distance views looking north from the asset (Figure 2). Such views, as existing, are not considered to contribute to the significance of the asset. They capture the asset's situation amongst an agrarian field system, which is not representative of its antiquarian setting. The Proposed Development, whilst potentially visible from the asset, will be located 780m away, beyond multiple field boundaries, Highfield Lane and Winwick Interchange (the M6) situated between the asset and the DCO Site. Furthermore, at present, the asset is neither visible nor accessible from within the public realm. Whilst Historic England advises that a view does not need to be public to be contributory to the significance of a heritage asset, the predominant inaccessibility of views from the asset looking north further limits their contribution to its significance.

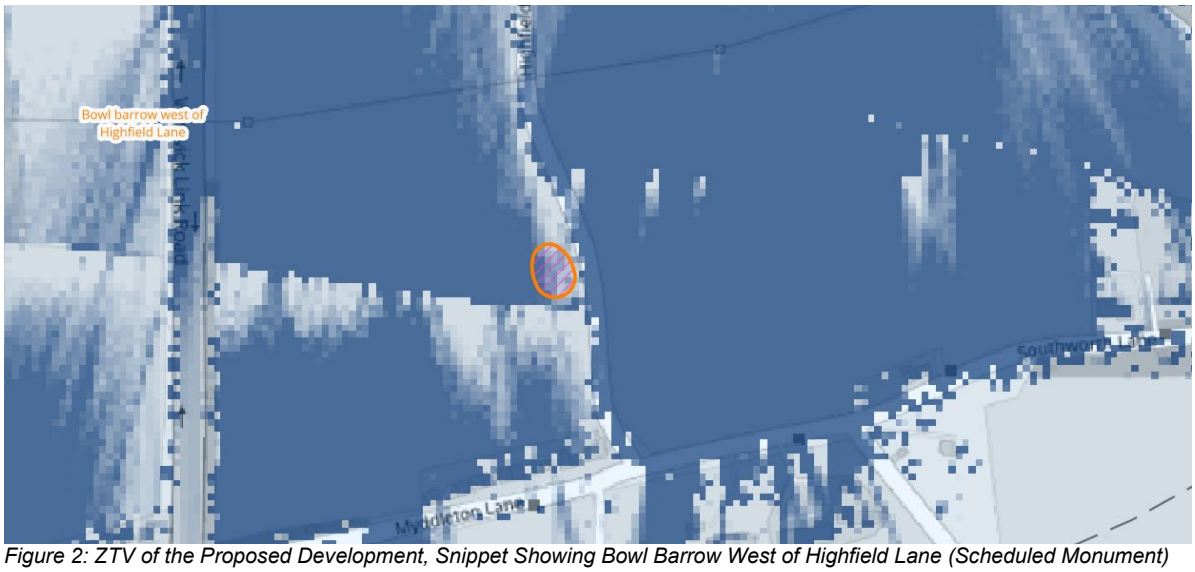


*Figure 2: ZTV of the Proposed Development, Snippet Showing Bowl Barrow West of Highfield Lane (Scheduled Monument)*

Were such views to be made publicly accessible, the potential visibility of the Proposed Development in the background is judged unlikely to affect an appreciation of the asset's immediate situation amongst a green, but non-representative setting. Indeed, the Proposed Development would be experienced as part of an established pattern of change amongst the widest surrounds of the asset, which include the installation of railway infrastructure and modern roadways, including the M6.

The asset's designation *'includes a 2-metre boundary around the archaeological features, considered to be essential for the monument's support and preservation'*. Elements located in areas beyond this boundary are thereby implied to have a lower capacity for affecting the preservation of the asset. The ZTV suggests that, in a worst-case scenario, the Proposed Development has potential to be visible from within the setting of the asset. Nevertheless, in reality, the Proposed Development is likely to be substantially screened by existing trees, vegetation and the slight undulation of topography, cumulated by the 780m distance between the asset and the DCO Site. This is illustrated by Figure 3, below.

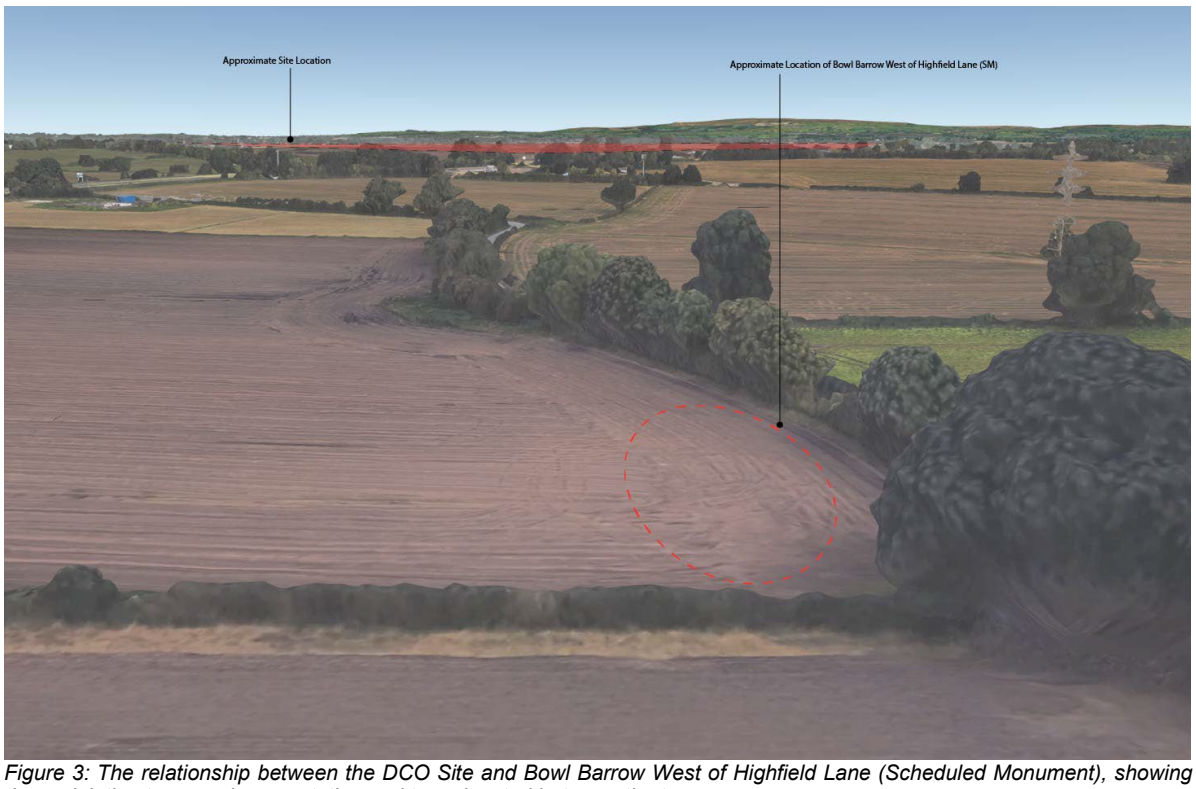



*Figure 3: The relationship between the DCO Site and Bowl Barrow West of Highfield Lane (Scheduled Monument), showing the undulating topography, vegetation and trees located between the two.*

The potential visibility of the Proposed Development is judged unlikely to affect the contribution of the asset's setting to its significance. Furthermore, potential visibility of the Proposed Development is unlikely to affect an appreciation of the asset's condition and contents, both of which *'survive[s] reasonably well'* and are implied by Historic England to make a primary contribution to the asset's significance.[2]

Assets Within a Wider 3km Study Area

The Opinion requested that, in order for heritage assets located within a wider 3km study area to be scoped out of the forthcoming ES, significant effects resulting from the Proposed Development be demonstrably unlikely. The following assets have been identified within 3km:

- Bowl Barrow West of Highfield Lane (Scheduled Monument)
- Church of St Oswald (Grade I)
- Sankey Viaduct over Sankey Brook (Grade I)
- Gatehouse to Bradlegh Hall (Grade II*)
- Bradlegh Old Hall Moted Site and Fishpond (Scheduled Monument)

The above list of heritage assets located within a 3km study area are extracted from a wider scope of assets within this area owing to their greater sensitivity to change affecting their setting. The assets are judged to be of high value, reflected in their designation, and, in keeping with Historic England's GPA3,[3] they have been more closely considered for scoping into the forthcoming ES than other assets within the study area which are of comparatively lesser value and lower sensitivity to change. The above list of assets derive particular significance from their setting, and as such are of greater sensitivity.

[2] Historic England Listing Description for *'Bowl barrow west of Highfield Lane – 1011124'*

[3] Historic England GPA3: The Setting of Heritage Assets (2017)

*Bowl Barrow West of Highfield Lane (Scheduled Monument)*

Justification for the proposed omission of the Bowl Barrow West of Highfield Lane (Scheduled Monument) from the scope of the forthcoming ES is set out in the previous section of this document.

*Church of St Oswald (Grade I)*

The ZTV submitted within the Scoping Report demonstrates that there is unlikely to be visibility of the Proposed Development from the Church of St Oswald (Grade I). This is set out in Figure 3, below. The ZTV indicates that, in this worst-case scenario, glimpsed visibility of the Proposed Development may be experienced in the area surrounding the asset. However, this is likely to be limited by existing built form and vegetation located between the DCO Site and the asset, and any associated effects upon the setting of the asset would be mitigated by the c.145km distance between the two.

At present, the DCO Site is judged to have no relationship with the setting of the asset by way of its intervisibility, its proximity, and its lack of historic, architectural and experiential association with the asset. The Proposed Development is unlikely to impact the significance of the asset as experienced in views from its wider setting and will likely continue to allow for the significance of the asset to be appreciated, and not compete with views of the asset.[4] As such, the asset is considered unlikely to experience effects arising from the Proposed Development. In accordance with National Networks NPS paragraphs 5.210 and 5.216 and NPPF paragraph 200, the asset is proposed to be scoped out of the forthcoming ES.

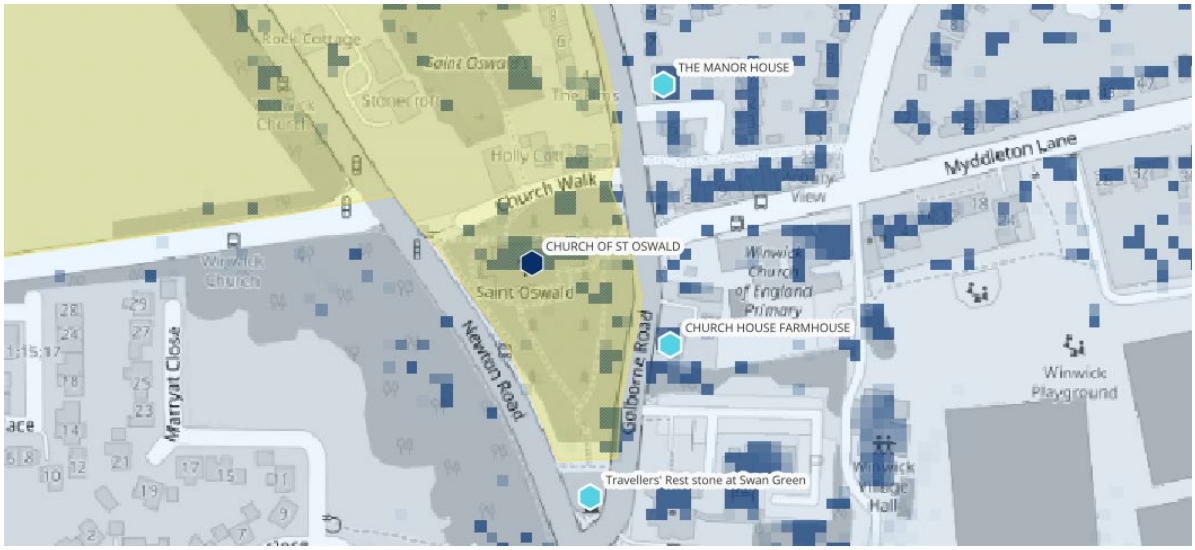


*Figure 4: ZTV of the Proposed Development, Snippet Showing Church of St Oswald (Grade I)*

[4] Ibid


*Figure 5: Aerial showing the Church of St Oswald with its prominent spire, which dominates its village setting and is located c.1.45km away from the Site and undulating topography, vegetation, trees and roadways including the M6 exist in between.*

*Sankey Viaduct over Sankey Brook (Grade I).*

The ZTV submitted within the Scoping Report demonstrates that there is unlikely to be any visibility of the Proposed Development from the Sankey Viaduct over Sankey Brook (Grade I). This is set out in Figure 6, below. Whilst there may be glimpses from atop the viaduct, this would be seen as a small part of the wider varied landscape featuring pockets of both development and open landscape. It would not affect the understanding of the viaduct, nor its role in the landscape. Due to its lack of potential visibility and the distance between the DCO Site and the asset (c.2.56km), the Proposed Development is unlikely to affect the significance of the asset. As such, the asset is proposed to be scoped out of the forthcoming ES.

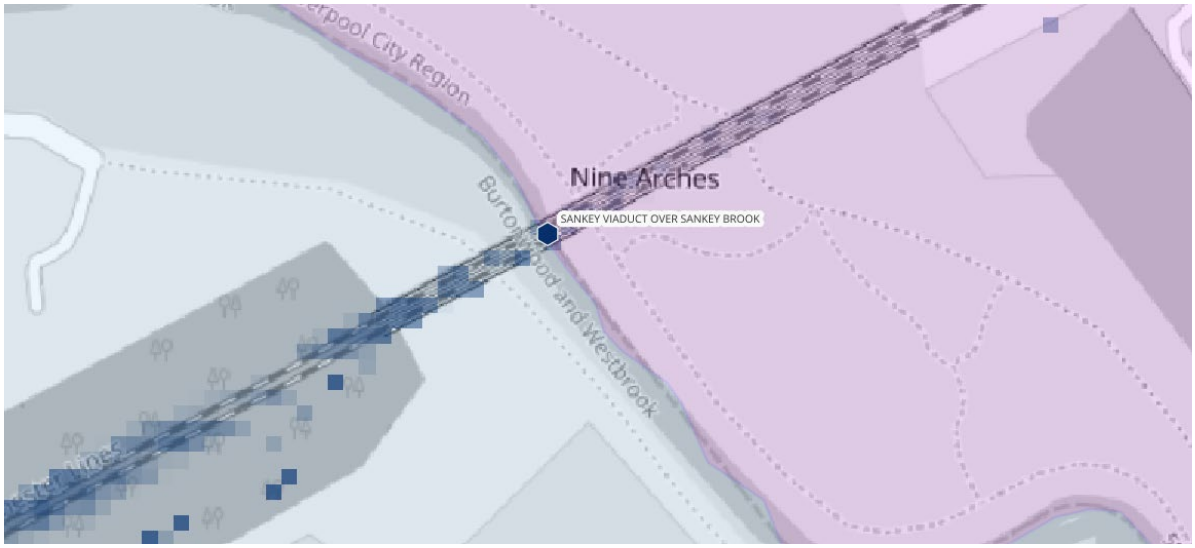



*Figure 6: ZTV of the Proposed Development, Snippet Showing Sankey Viaduct Over Sankey Brook (Grade I)*

*Gatehouse to Bradlegh Hall (Grade II*) and the Bradlegh Old Hall Moated Site and Fishpond (Scheduled Monument)*

The ZTV submitted within the Scoping Report demonstrates that there is unlikely to be any visibility of the Proposed Development from the Gatehouse to Bradlegh Hall (Grade II*) and the Bradlegh Old Hall Moted Site and Fishpond (Scheduled Monument). This is set out in Figure 7, below. The ZTV indicates that, in this worst-case scenario, glimpsed visibility of the Proposed Development may be experienced from the asset. However, this is likely to be limited by the southern section of Newton-le-Willows which comprises extensive built development which characterises the assets' wider setting, as well as vegetation located between the DCO Site and the assets. Any associated effects upon the setting of the assets would be mitigated by the c.2.45km distance between them.

At present, the DCO Site is judged to have no relationship with the setting of the assets by way of its lack of intervisibility, its proximity, and its lack of current association with the asset by way of land ownership or designed landscapes and views. As such, the asset is considered unlikely to experience effects arising from the Proposed Development. In accordance with National Networks NPS paragraphs 5.210 and 5.216 and NPPF paragraph 200, the asset is proposed to be scoped out of the forthcoming ES.

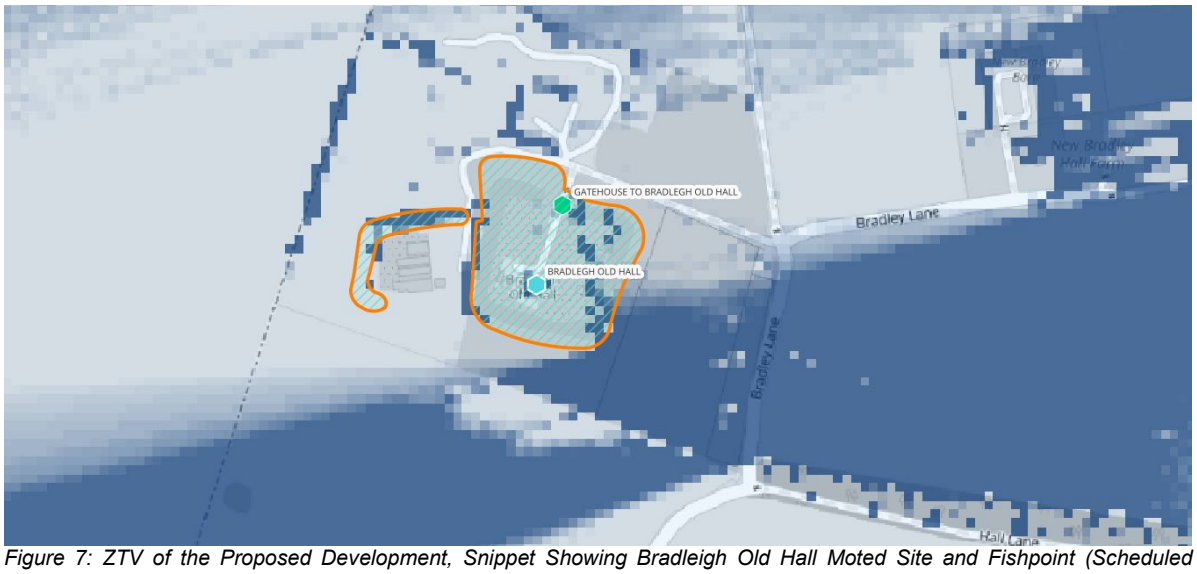



*Figure 7: ZTV of the Proposed Development, Snippet Showing Bradleigh Old Hall Moted Site and Fishpoint (Scheduled Monument) and Gatehouse to Bradlegh Hall (Grade II*)*

## 3. Conclusion

This Note has sought to provide additional clarification on the methodology and proposed scope of assessment for the forthcoming ES. This will form part of the Built Heritage ES Chapter, as requested within the PINS Scoping Opinion, but is provided in advance of the PEIR in order to agree and confirm the scope and methodology with relevant consultees in the first instance to inform the Built Heritage PEIR Chapter.

In summary and through further analysis, the scope of assessment as set out in the Scoping Report is considered to be appropriate, as agreed by PINS. There have been no comments thus far raised by consultees in relation to the Scoping Opinion or Non-Statutory Consultation. The main item for agreement is the methodology; relevant changes to 'Sensitivity Classification Table' have been made and further justification has been provided for the categorisation of Grade II listed buildings as 'medium' sensitivity. As such, the methodology is also considered to be appropriate and in line with heritage policy and guidance, pending agreement with consultees. .