

◆ Archaeology

INTRODUCTION

1. Intermodal Logistics Park North Ltd. ('the Applicant') is promoting proposals for a new strategic rail freight interchange (SRFI) and associated development on land to the east of Newton-le-Willows, in the jurisdictions of Warrington, St Helens, Wigan and Warrington Councils. An SRFI is a large multi-purpose freight interchange and distribution centre linked into both the rail and trunk road systems. SRFIs reduce the cost of moving freight by rail and encourage the transfer of freight from road to rail, thereby reducing carbon emissions and contributing to the UK's target to achieve net zero by 2050.
2. Under the Planning Act 2008, the proposals qualify as a Nationally Significant Infrastructure Project (NSIP). Accordingly, an application for a Development Consent Order (DCO) is to be made to the Planning Inspectorate (PINS), which will examine the DCO application on behalf of the Secretary of State (SoS) for Transport.
3. Before making a DCO application, an Environmental Impact Assessment (EIA) of the Proposed Development will be undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations'). EIA is a process that provides the decision maker with sufficient information about the likely environmental effects of a project and is used to improve the environmental design of a development proposal. The first stage of this process was the submission of a request for a formal scoping opinion under Regulation 10 of the EIA Regulations.
4. The Applicant submitted an EIA Scoping Report to the Planning Inspectorate in October 2024. This outlined the work undertaken to date and sought advice from the Inspectorate on the likely significant effects of the Proposed Development and the topics that needed to be assessed as part of the Environmental Impact Assessment (EIA). A Scoping Opinion was received in December 2024 and this will be used to inform the EIA process for the Proposed Development. A summary of the main comments received and how the Applicant intends to address these are set out in the table below.

Table 1 Scoping Opinion comments and responses

Inspectorate's Comments	Applicant's Response
The Scoping Report seeks to scope out effects on archaeological remains from Prehistoric, Roman, Medieval, Post-Medieval remains	The Applicant notes this comment.

Inspectorate’s Comments	Applicant’s Response
during operation. The Inspectorate agrees that this matter can be scoped out of the assessment on that basis. The ES should nevertheless confirm that no below ground works are required during the operation phase.	
The valuation of receptor sensitivity should be consistent with Built Heritage and clarified in the ES for the assessment of archaeological receptors.	The Applicant notes this comment.
The ES baseline data should be supported by information from the Cheshire Historic Environment Record.	The Applicant notes this comment.

5. Icení Projects have been commissioned to undertake an assessment of the effects of the Proposed Development on archaeology. Icení Projects is a multi-disciplinary consultancy with offices in London, Birmingham, Manchester, Edinburgh and Glasgow. The Icení Archaeology Team has Registered Organisation (RO) status with the Chartered Institute for Archaeologists (CIfA). The topic paper is authored by Phil Stastney PhD MCIfA, Senior Project Manager.
6. Archaeology includes a wide range of features recognised in policy as 'heritage assets', specifically those heritage assets that are wholly or partially buried ('below ground'), and may include designated heritage assets such as World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Registered Historic Battlefields and below-ground remains relating to Listed Buildings, as well as below-ground non-designated heritage assets, such as sites, monuments and landscapes. Built heritage, which focuses on standing structures and their setting and conservation, is considered separately from archaeology.

RELEVANT LAW, POLICY AND GUIDANCE

7. The DCO application will be determined pursuant to the Planning Act 2008 and relevant regulations, the National Networks National Policy Statement ('NPSNN', adopted 2024) and the National Planning Policy Framework (NPPF). Relevant local planning policy are material considerations.
8. The following pieces of legislation, policies and guidance documents are relevant to the assessment of the potential effects of the Proposed Development on archaeology:

Legislation

- Ancient Monuments and Archaeological Areas Act 1979 – Part I Ancient Monuments:

Protection of Scheduled Monuments. This legislation established the protection of archaeological heritage in England, Wales and Scotland, and further introduced the legal protection of sites of national significance/archaeological importance as 'Scheduled Monuments'. Through this Act, damage to a scheduled monument became a criminal offence.

- Planning Act 2008 ('the 2008 Act') - specific reference to Section 104, which imposes a statutory duty on the Secretary of State to determine applications for development consent in accordance with that section where a national policy statement has effect.
- Infrastructure Planning (Decisions) Regulations 2010 ('the 2010 Act') – specific reference to Regulation 3 (1-3). This regulation set out the matters which the decision-maker must have regard to, for development consent order applications under the Planning Act 2008. Regulation 3 specifically outlines that if a proposal potentially affects a listed building or its setting, the decision-maker must take into account the desirability of preserving a listed building or its setting, or indeed other features of historical interest. This principle is also mirrored for development consent order applications affecting conservation areas and scheduled monuments and their settings.

National Planning Policy

- National Networks National Policy Statement ('NPSNN', adopted 2024) – specific reference to paragraphs 5.205-5.226 which relate to the historic environment. The policy sets out the requirements to, and framework for, considering the potential effects to designated and non-designated heritage assets, including where harmful effects may arise.
- National Planning Policy Framework ('NPPF', 2024) – specific reference to Section 16: Conserving and Enhancing the Historic Environment, paragraphs 202-221. The emphasis of this policy reflects the NPSNN above.

Local Planning Policies and Guidance

9. St Helens Borough Council Local Plan Up to 2037 (adopted 2022) – specifically:
 - Policy LPC11 Historic Environment which requires the submission of a desk-based assessment and, where necessary, a field evaluation where a development would be likely to any site with potential to include archaeological interest, and assessment of impact on the significance of assets, in line with case law, legislation and the NPPF; and
 - Policies LPA09 Parkside East which allocates the Main Site and part of the Western Rail Chord for a Strategic Rail Freight Interchange, and LPA10 Parkside West which allocates this area (including a small part of the Western Rail Chord) for industrial, storage and distribution. Related to archaeology, both of these policies require compliance with LPC11 on protection of designated heritage assets, including the Registered Battlefield of Winwick.
10. Wigan Statutory Development Plan comprising: Core Strategy DPD Remaining Policies (March

2024)

- Policy CP11: Historic Environment which requires the conservation and enhancement of heritage assets, and assessment of impact on the significance of heritage assets, in line with national planning policy.
11. Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 to 2039 (adopted 2024) – specifically:
- Policy JP-PS: Heritage which requires the conservation and enhancement of heritage assets, and assessment of impact on the significance of heritage assets, in line with national planning policy.
 - Wigan Council ‘Historic Environment Strategy SPD’ (2021)
12. Warrington Borough Council Local Plan 2021/22 - 2038/39 (2023) – specifically:
- Objective W5 Warrington’s Historic Environment, and Policy DC2 Historic Environment which requires the conservation and enhancement of heritage assets, including archaeology, including particular consideration to be given to the Registered Battlefield of Winwick (among others), and assessment of impact on the significance of heritage assets in line with statutory considerations and national planning policy.

Other Relevant Guidance

- Planning Practice Guidance (2023) – Historic Environment (2019);
- English Heritage (2008) Conservation Principles, Policies and Guidance;
- Historic England (2015), Managing Significance in Decision-Taking in the Historic Environment – Historic Environment Good Practice Advice in Planning: 1. The Historic Environment in Local Plans (‘GPA2’);
- Good Practice Advice in Planning 3 (GPA3) (2017): The Setting of Heritage Assets;
- Historic England (2017), Guidance on Battlefields; and
- Historic England (2020) Good Practice in Planning 4: Enabling Development and Heritage Assets.

Professional Regulations and Standards & Guidance

- Historic England (2022) Planning and Archaeology: Historic England Advice Note 17;
- Chartered Institute for Archaeologists (CIfA), 2023, Standard for archaeological excavation;
- Chartered Institute for Archaeologists (CIfA), 2023, Standard for archaeological monitoring and recording;

- Chartered Institute for Archaeologists (CifA), 2014, Standard and Guidance for the Collection, Documentation, Conservation and Research of Archaeological Materials (revised 2020);
- Chartered Institute for Archaeologists (CifA), 2014, Standard and Guidance for Archaeological Field Evaluation (revised 2023);
- Chartered Institute for Archaeologists (CifA), 2014, Code of Conduct (revised 2022);
- Chartered Institute for Archaeologists (CifA), 2014, Standard and Guidance for the Creation, Compilation, Transfer and Deposition of Archaeological Archives (revised 2020); and
- Chartered Institute for Archaeologists (CifA), 2014, Standard and Guidance for the Collection, Documentation, Conservation and Research of Archaeological Materials.

SITE DESCRIPTION

Site location

13. The DCO Site is located on the eastern extent of Newton-le-Willows in a flat, agricultural landscape. The DCO Site is located within the local authority areas of St Helens Borough Council, within the Liverpool City Region Combined Authority area; Wigan Council, within the Greater Manchester Combined Authority area; and Warrington Borough Council.
14. The DCO Site is split broadly in two sections:
 - the Main Site – land to the east of the M6 motorway, to the south of the Chat Moss Line and to the west of Winwick Lane incorporating the triangular parcel of land located to the west of Parkside Road and to the north of the Chat Moss Line; and
 - the Western Rail Chord – land to the west of the M6 motorway, which bisects the DCO Site in a northwest southeast orientation, and to the east of the West Coast Mainline.
15. The majority of the land contained within the Main Site is bound to the north by the Chat Moss Line (Liverpool-Manchester railway line), to the west by the M6 motorway and to the southeast by Winwick Lane (A579). The Main Site south of the Chat Moss Line is approximately 198 hectares in size. The Highfield Moss Site of Special Scientific Interest (SSSI) is also adjacent to the north of the DCO Site, which is described in more detail below. A number of other uses exist at the Main Site currently, including:
 - Kenyon Hall Airfield, which is a small airfield used by the Lancashire Aero Club for recreational flying of small propeller planes;
 - Warrington Model Flying Club, which is a model club for radio-controlled model aircraft; and
 - Highfield Farm, which is comprised of two agricultural/residential buildings set within a curtilage surrounded by agricultural fields.

16. The majority of the Main Site is comprised of agricultural fields used for arable crops, with some small patches of woodland in the east. There are also a number of residential properties, farmsteads and a commercial yard within the Main Site. Parkside Road (A573) runs through the DCO Site to the south before passing over the M6 where it provides access to Parkside Link Road West.
17. The triangular parcel of land located to the north of the Chat Moss Line and to the east of Parkside Road also forms part of the Main Site.
18. The Western Rail Chord of the DCO Site is approximately 12 hectares in size and is bordered to the west by the West Coast Mainline railway, to the north by the Chat Moss Line and to the east by the Parkside West Development. The Western Rail Chord is comprised of safeguarded land for the rail-turn head to enable trains to be serviced to and from the North and the East.
19. The Western Rail Chord is comprised of scrub land and areas of woodland which are set within the context of an area of redevelopment with commercial uses proposed, which is known as Parkside West, and is currently being promoted through the Town and Country Planning Act process.

Baseline environment

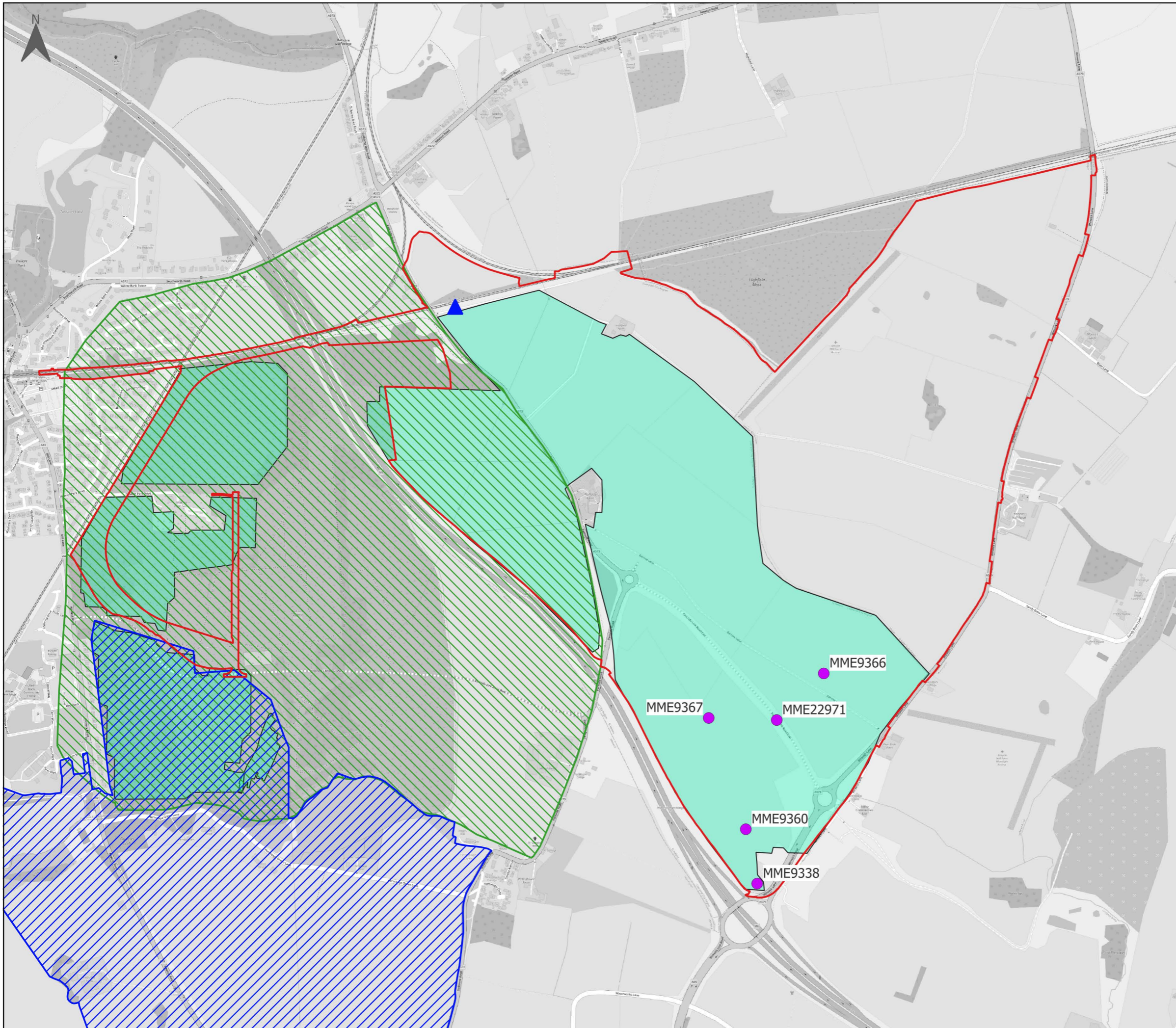
20. For the purposes of this Topic Paper, the archaeological baseline conditions have been established by carrying out a high-level review of datasets including Historic Environment Record (HER) data from Merseyside (MHER) and Greater Manchester (GMHER), Historic England Aerial Archaeology Mapping Explorer and National Heritage List for England, and a report on a previous geophysical survey carried out in the area.¹
21. At present, the following baseline information has been established and is illustrated in Figure 1:
 - No World Heritage Sites or Historic Wrecks are located within a 1km radius of the DCO Site.
 - The Registered Battlefield of the Battle of Winwick (also known as Battle of Red Bank) 1648 is located directly adjacent to, and partially overlapping with, the western edge of the DCO Site boundary (List Entry Number 1412878).
 - No Scheduled Monuments are located within the DCO Site, although one Scheduled Monument is located within a 1km radius: ‘Castle Hill Motte and Bailey and Bowl Barrow’ (List Entry Number: 1009867), which is located to the north-west of the DCO Site.
 - The ‘Huskisson Memorial on south side of Railway’ is a Grade II Listed Building (List Entry Number: 1075900) located within the northern part of the DCO Site.
 - The site of a medieval park, Newton Park, Newton-in-Makerfield (MHER Monument ID:

¹ Stratascan, 2007, Geophysical Survey Report, Newton-Le-Willows, Merseyside.

MME9311), is partially located within the western part of the DCO Site.

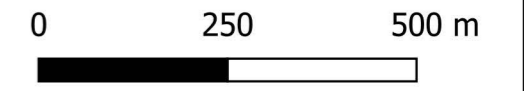
- A cropmark interpreted as a possible ring ditch (MME9366) and a Neolithic tree throw (MME22971) are recorded in the MHER north of Rough Farm.
- A possible barrow is recorded in the MHER south of Rough Farm, at the junction of the M6 and Winwick Lane (MME9338).
- Possible Post medieval field boundaries located east of M6 on Newton-in-Makerfield are recorded in the MHER (MME9360 and MME9367).
- The site of the medieval Kenyon Hall (CHER612/2), a possible site of a medieval mill (CHER590), and a nearby Bronze Age round barrow (CHER588) are recorded beyond the southeastern edge of the DCO Site boundary (not shown in Figure 1).

22. A previous geophysical survey covering part of the DCO Site carried out prior to the Parkside West Phase 1 development, identified several anomalies of possible archaeological origin, in the form of positive linear and area anomalies indicating the presence of cut features (i.e. pits and ditches). These features are evident within the majority of the survey area; although particular concentrations were noted in the areas north and south of Barrow Lane, and north of Rough Farm.



INTERMODAL LOGISTICS PARK (ILP) NORTH

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Key:

- Registered Battlefield (1412878)
- Listed Building (1075900)
- MHER Monument (MME9311)
- MHER Monument Points
- Previous geophysical survey area
- Draft Order Limits



**Figure 1
 Known Archaeological Receptors and investigations**

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Drawing Number:	1
Drawing Status:	INFORMAL CONSULTATION
Revision:	02
Drawn by:	PS
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Historic Environment Record (HER) obtained on 10/07/2024 and is the copyright of Historic England 2024 (Enquiry No.: CME3210).
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DEVELOPMENT DESCRIPTION

23. The Proposed Development is for an SRFI and associated development comprising:
- provision of a rail terminal serving up to 16 trains per day, including ancillary development such as container storage, cranes for the loading and unloading of shipping containers, Heavy Goods Vehicle (HGV) parking, rail control building and staff facilities;
 - a rail turn-back facility within the Western Rail Chord;
 - up to c.767,000 square metres (m²) (gross internal area) of warehousing and ancillary buildings with a total footprint of c.590,000m² and up to c.177,050m² of mezzanine floorspace, subject to ongoing design and market assessment, comprising a mixture of units with the potential to be rail-connected, rail served and additional units;
 - new road infrastructure and works to existing road infrastructure;
 - provision of overnight lorry parking for users of the SRFI;
 - new energy centre and electricity substations, including central battery storage and potential provision of central Combined Heat and Power (CHP) units to augment the grid supply in the case of demand exceeding instantaneous firm and variable supplies;
 - provision of photovoltaics and battery storage on site;
 - strategic landscaping and open space, including alterations to public rights of way and the creation of new ecological enhancement areas;
 - demolition of existing on-site structures (including existing residential dwellings / farmsteads and commercial premises);
 - potential relocation of the Huskisson Memorial; and
 - earthworks to regrade the DCO Site to provide appropriate access, connections to the railway, development plots and landscape zones.

OUR APPROACH TO THE ASSESSMENT

24. The first stage of the assessment is to verify the baseline conditions of the DCO Site and surrounding area. The scope of work includes an Archaeological Desk-Based Assessment (DBA) which will form the archaeological baseline for the Environmental Statement (ES) Chapter.
25. The DBA will consider data from a study area, anticipated to comprise a 1km radius from the DCO Site, subject to agreement in consultation with the Merseyside Environmental Advisory Service (MEAS), Greater Manchester Archaeological Advisory Service (GMAAS), and Cheshire Archaeology Planning Advisory Service (CAPAS). These bodies provide archaeological advice to the respective Local Planning Authorities (LPAs) of St Helens Borough Council, Wigan

Council, and Warrington Council.

26. The following sources will be consulted in the production of the DBA:
- MHER, GMHER and CHER data detailing the results of finds, monuments and previous archaeological investigations within the DCO Site and in the surrounding study area;
 - Historic England National Heritage List for England;
 - Historic Maps – Ordnance Survey (OS) maps from their historic first edition through to modern OS mapping. Earlier historic maps will also be consulted where available;
 - Aerial Photography – Historic and modern aerial photography will be examined using the HE Aerial Photo Explorer;
 - BGS digital geology maps and borehole data;
 - Reports on past archaeological investigations within the study area; and
 - Details of the Proposed Development, including existing and proposed site plans, topographical survey, contamination report, borehole data, existing site services and utilities report.
27. An initial commencement meeting was held between the Applicant (Built Heritage and Archaeology), Historic England and St Helens Council on the 27th of June 2024 to introduce the emerging Proposed Development. Further engagement with relevant stakeholders, including Historic England and archaeological advisory teams to the Local Planning Authorities, will be undertaken throughout the application process, including at key milestones after scoping and PEIR comments received, to discuss key archaeological considerations.
28. The findings from the DBA will determine the need for targeted archaeological evaluation to support the ES chapter for the DCO submission, which will be discussed with Historic England and the archaeological advisory teams to the LPAs.
29. The ES Chapter will set out an assessment of the impacts of the demolition and construction works associated with the Proposed Development on any identified or potential archaeological remains. This will be followed by an assessment of the overall significance of effect upon archaeological assets, both before and after mitigation. The significance of effect reflects both the importance of the resource and the degree to which the resource would be impacted (i.e. magnitude of impact).

LIKELY MAIN EFFECTS OF THE PROPOSALS

30. The archaeological assessment has already commenced with a high-level review of the publicly available information to assess the potential archaeological constraints across the Proposed Development.
31. The potential sensitive receptors include all of the designated and undesignated

archaeological assets within the Study Area and all the known and as-yet unknown archaeological assets within the DCO Site to be identified as part of the DBA.

32. The following known archaeological receptors are located within the DCO Site boundary and are shown in Figure 1:
- Any Buried remains associated with the Grade II Listed Huskisson Memorial (List Entry Number: 1075900);
 - Buried remains associated with the Registered Battlefield of the Battle of Winwick (also known as Battle of Red Bank) 1648 (List Entry Number 1412878);
 - Buried remains associated with the site of the medieval Newton Park (MHER Monument ID: MME9311); and
 - Buried remains associated with the known archaeological features recorded in the MHER (MME22971, MME9338, MME9360 and MME9367).
33. There is potential for further, currently unknown, archaeological receptors to be identified within the DCO Site boundary as the assessment progresses and further work is undertaken to verify and expand the baseline conditions of the DCO Site.
34. Archaeological remains are susceptible to a range of direct permanent impacts during development associated with site preparation and construction, including demolition and site clearance, excavations for foundations, underground services, ground reprofiling and other groundworks, piling and dewatering.
35. At the time of writing and as advised by PINS in the Scoping Opinion it is not expected that the operation (including maintenance) of the Proposed Development will result in any further intrusive ground activities. Therefore, direct and indirect impacts to known and unknown buried heritage remains are not expected during the operational phase
36. The implications, if any, of these impacts and the significance of their effects will be determined by consideration of the significance/sensitivity of the archaeological assets and the magnitude of the impacts, with a level of professional judgement included in the determination.

PROPOSED APPROACH TO MITIGATION

37. For archaeological assets within the DCO Site, the priority is to avoid harm. If preservation in situ is not viable to prevent effects, an appropriate mitigation strategy will be identified, discussed and agreed as appropriate. All work will be undertaken in consultation with the archaeology advisory teams to the Local Planning Authorities and with the Inspectors at Historic England. This will be further detailed in the DBA.
38. It is expected that the following industry-wide recognised archaeological mitigation measures will be included in the program of archaeological mitigation in excess of the embedded mitigation, such as avoidance of sensitive features, included in the Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CTMP)

and will be applied to as forms of control and mitigation over any potential impact on buried heritage assets, depending on their significance and the extent of the Proposed Development's impacts:

- Archaeological excavation or strip, map and record excavation; and
- Archaeological watching brief.

39. A further review of the archaeological mitigation strategies to be implemented during the different phases of the Proposed Development, and how these will be applied to the different receptors will be included in the ES chapter, when there is more information about the actual archaeological survival on the DCO Site (via field evaluation) and the extent of the impacts of the Proposed Development.

NEXT STEPS

40. Further work is programmed to verify and expand the baseline conditions of the DCO Site and surrounding area. Once the DBA is near completion, the need for targeted archaeological evaluation will be determined in consultation with the LPA archaeological advisers and Historic England. In turn, the results of any archaeological evaluation fieldwork will support the ES chapter for the DCO submission and allow the formation of an appropriate mitigation strategy to secure the investigation and recording of archaeological remains, as appropriate.

41. This topic paper forms part of the material available for the informal consultation that is taking place between 27 January 2025 and 21 March 2025. Should you wish to comment on this paper or any other matters related to the Proposed Development you can respond to the informal consultation via:

- ILP North website – www.tritaxbigbox.co.uk/our-spaces/intermodal-logistics-park-north
- Email ilpnorth@consultationonline.co.uk
- Freepost ILP North
- 01744 802043