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Local Plan, Planning Policy and Programmes, Growth Directorate
Warrington Borough Council
East Annexe
Town Hall
Sankey Street
Warrington
WA1 1HU

12 November 2021

Dear Sir / Madam

**WARRINGTON UPDATED PROPOSED SUBMISSION VERSION LOCAL PLAN 2021 – 2038
PUBLIC CONSULTATION OCT/NOV 2021 - LETTER OF REPRESENTATION**

On behalf of our clients, Omega Warrington Limited (OWL), we write to submit representations to Warrington Borough Council in relation to the emerging Local Plan (2021 – 2038), and specifically the ‘Updated Proposed Submission Version’, which is currently undergoing a consultation period running from 04 October – 15 November 2021.

OWL are the developers behind the Omega development site and since 2002, have worked in partnership with the landowner, Homes England, to bring Omega forward as a focus for economic, social and environmental regeneration within the area. This representation relates to OWL’s continuing interest in both Omega and Omega West, which are both referred to in the Updated Proposed Submission Version Local Plan (UPSVP).

Omega

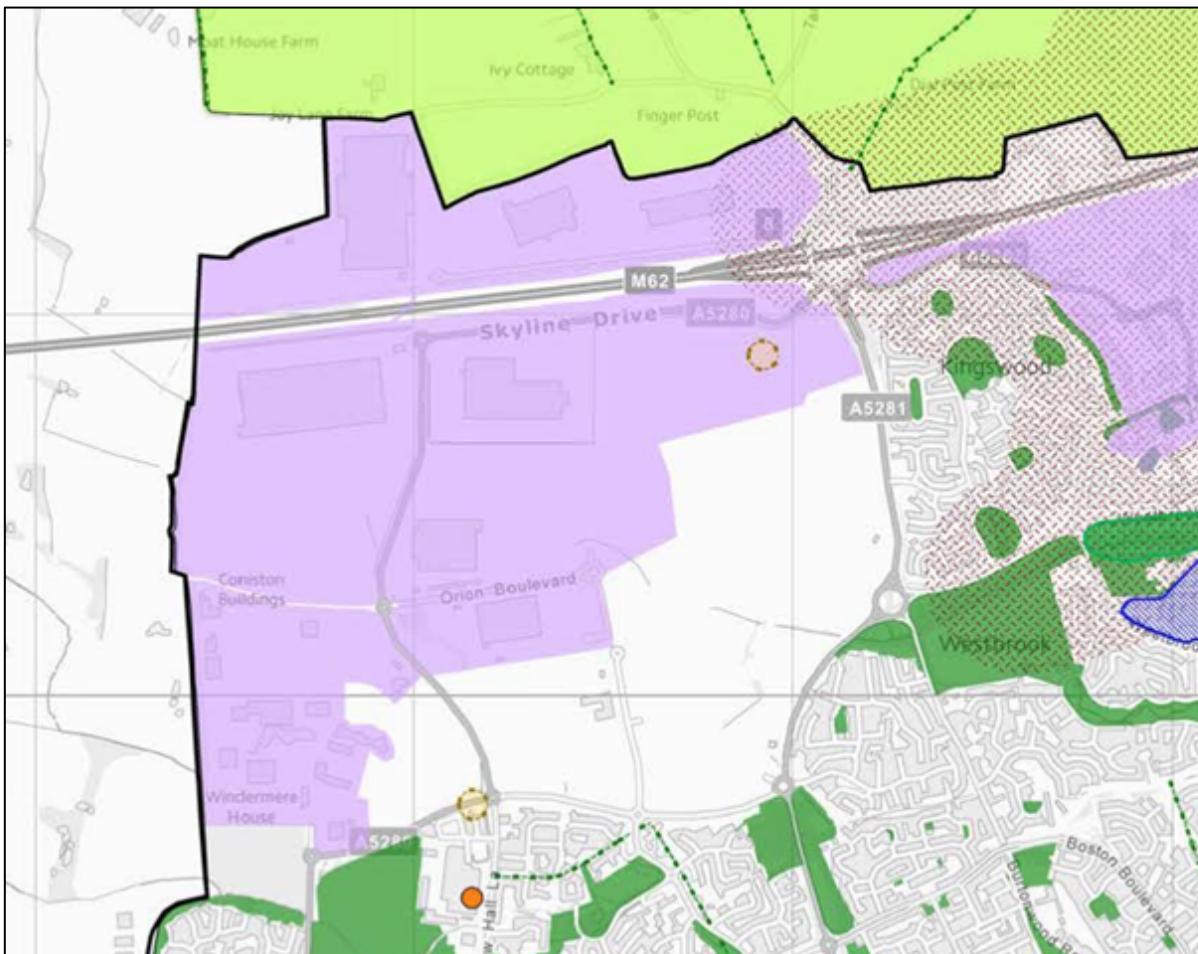
Over the course of the last 7 years OWL have overseen the delivery of over 5m sq.ft of manufacturing and logistics development at Omega, together with permission for up to 1400 residential units, all set within a high quality environment underpinned by a strong landscape framework.

OWL, together with Homes England, remain committed to the delivery of the Omega development opportunity in accordance with both the extant planning applications and planning policy designations for the site. OWL therefore welcome the Council’s continued recognition of the importance of Omega as an Existing Employment Area and primary location for industrial, warehousing, offices, distribution development, under UPSVP Policy DEV 4: Economic Growth and Development.





OWL also support the change to the Omega Employment Area allocation in the Policies Map, which now reflects the most up-to-date planning position on the site following the approval of outline planning permission 2019/36241 for further residential development in Phases 4-7, Omega South. However, OWL wish to highlight that the proposed Policies Map (extract below) does not show the most up-to-date information in relation to the Scheduled Ancient Monument previously situated on the site.

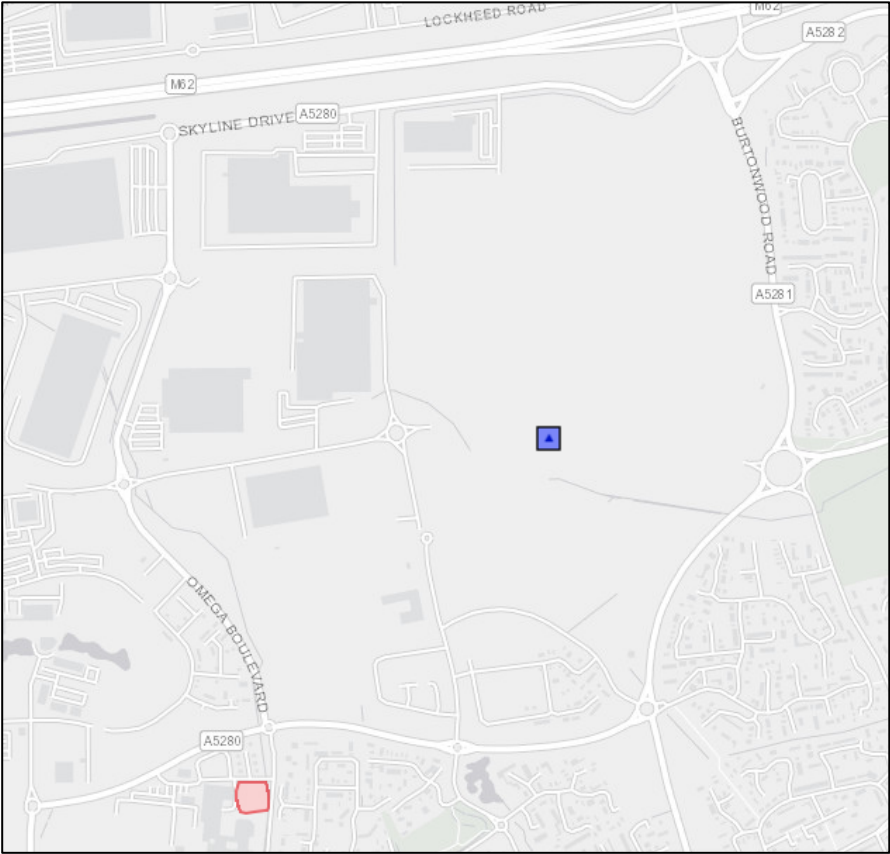


To facilitate the development of the Omega site, this heritage asset (Pickett Hamilton Fort) was removed from the location shown on the extract above, under Schedule Ancient Monument Consent (Ref. S00166399) and relocated to a new location on the edge of the Omega Green Heart as part of a public art installation scheme (Planning Permission Ref. 2018/33116).

Following completion of these works the Fort and its original location were de-scheduled (i.e. removed from the List of Scheduled Ancient Monuments) and the new public art installation was instead awarded Grade II listed status and added to the to the List of Buildings of Special Architectural or Historic Interest (List Entry Number: 1464711).



The Historic England Listing Notification Report (JAN 2020) prepared in respect of the listing is appended to this letter for your information and the below screenshot taken from Historic England’s mapping service shows the approximate location of the relocated listed structure. OWL therefore respectfully request that the Scheduled Ancient Monument designation shown on the UPSVLP Policies Map is removed, to reflect the status of this heritage asset.



Omega West

The UPSVLP also highlights the Duty to Cooperate between Warrington Borough Council and St.Helens Borough Council in respect of the 31.22ha site, known as Omega West, which will contribute towards the Warrington’s employment development needs. This 31.22ha site in St.Helens forms an natural extension directly to the west of the established Omega development as shown in UPSVLP Figure 4 – Existing and Proposed Employment Sites. The Site is owned by Homes England, who OWL has entered into a legal agreement with for its promotion and purchase.

Whilst the Site is currently in the Green Belt, it is proposed for allocation within the Draft St Helen’s Borough Local Plan 2020-2035 (Site Reference 1EA), which allocates the land for employment uses.



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OWL welcomes the co-operation between the two Councils which has led to the site being identified to meet Warrington's employment needs.

A hybrid planning application for the site proposing B2/B8 uses (St.Helens Borough Council planning application ref: P/2020/0061) received a resolution to grant at St.Helens Planning Committee on 27 October 2020. The application was subsequently called in by the Secretary of State in December 2020 and following a public inquiry in late April 2021, was approved by the SofS on 11 November 2021.

OWL believe that, following this approval, the UPSVLP should make reference within Policy DEV 4: Economic Growth and Development and / or its supporting text to the approved status of the Omega West site.

Furthermore, OWL would also like to restate their intention to work with Warrington Borough Council and St Helens Council to identify and deliver suitable measures to improve existing and future transport links between Omega West and Warrington / St Helens.

We trust you find this in order and look forward to receiving confirmation of receipt of this representation in due course.

Yours sincerely,

[Redacted signature]

Chris Gardner

[Redacted contact information]

Appendices:

1. Historic England Listing Notification Report (Jan 2020)



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Appendix 1:

Historic England Listing Notification Report (Jan 2020)



Case Name: Relocated Pickett-Hamilton Fort, Omega Warrington development

Case Number: 1464279

Background

An application has been received to assess the Pickett-Hamilton fort which has recently been moved with Scheduled Monument Consent (SMC) to a nearby location on the former Burtonwood Airfield, now being redeveloped as Omega Business Park.

The Pickett-Hamilton fort was scheduled on 6 December 2002 (National Heritage List for England (NHLE) 1020869). It is presently scheduled in its old location 600m south east of Limekiln Farm, national grid reference: SJ 56954 90861. We are here assessing the structure in its new location and considering whether listing is now a more appropriate designation.

Asset(s) under Assessment

Facts about the asset(s) can be found in the Annex(es) to this report.

Annex	List Entry Number	Name	Heritage Category	HE Recommendation
1	1464711	Pickett-Hamilton Fort	Listing	Add to List

Visits

None: Data from other sources.

Context

The fort was scheduled on 6 December 2002. It was moved and restored with SMC in 2018-2019. Part of the reassessment is to consider the most appropriate designation for the relocated fort, which was made clear at the consultation stage.

Assessment

CONSULTATION

The owner and the occupier (developer) were consulted via their agent, the local authority and the Historic Environment Record (HER) were also consulted. The County Archaeologist was also consulted, but the Cheshire Archaeology Planning Advisory Service (Cheshire East) replied to say that they had forwarded the consultation report on to the planning department of Warrington Borough Council as a more appropriate respondent. The Ancient Monuments Society was also consulted as an interested party due to the possible re-designation.

The agent responded on behalf of the developer and the owner to confirm their support for the review process. They comment that while they are aware that both scheduling and listing offer similar levels of protection, which should be maintained, they consider that listing may now be more appropriate as the fort has been moved and is now displayed in a way that is not consistent with its historic setting. A typo was picked up and information about the interior was provided, which have been added to the Details.

No other responses were received.

DISCUSSION

Modern military structures are discussed in Historic England's Scheduling Selection Guide for Military Sites Post-1500 (July 2018) and the Listing Selection Guide for Military Structures (December 2017). The Listing Selection Guide states that certain non-adaptable structures, such as blast pens, and certain defence structures, like Pickett-Hamilton forts and bomb stores, have historically been designated by scheduling. More recently consideration has been given to listing which may often be a more appropriate approach because of the greater flexibility this offers in terms of maintenance and protection.

Defensive structures associated with Second World War airfields may be designated where they form part of a near complete defensive provision, or where a portion of an airfield represents the nature of the airfield defence that existed more widely across the site. Alternatively, defensive structures can be considered for individual designation if they are particularly rare survivals nationally. The latter is the case for the Pickett-Hamilton fort located on the former Burtonwood Airfield, as the airfield has been redeveloped as a business centre and the main runway was built over with the post-war construction of the M62.

It is estimated that approximately 240 Pickett-Hamilton forts were constructed in England. A document in the National Archives lists the sites where retractable pillboxes had been constructed by June 1941, but does not quantify how many were built at each site. The total number of surviving examples are not known at the present time, but it is possible to identify some of these and a small number have been assessed and designated for their national importance. Eight Pickett-Hamilton forts have historically been scheduled, included the subject fort at Burtonwood Airfield, which was scheduled in December 2002 in its former location. The other examples are one Pickett-Hamilton fort at RAF West Malling, Kent (National Heritage List for England 1020308), with its pair removed and displayed at the Imperial War Museum, Duxford; three at RAF Swanton Morley, Norfolk (NHLE 1020780); two at RAF Honington, Suffolk (NHLE 1020779); one at RAF Middle Wallop, Hampshire (NHLE 1001795). More recently a Pickett-Hamilton fort at RAF Worthy Down Airfield, Hampshire, was listed at Grade II in April 2010 (NHLE 1393762).

The Defence of Britain database is a useful resource in identifying surviving Pickett-Hamilton forts, although the data was collected by volunteers and should not be considered definitive. It lists 38 forts in England of which three had been destroyed by 2008, suggesting that there are 35 extant examples (including the designated forts) although the condition of some of this group has not been verified. There are also a few other known examples: two at former RAF Kenley, Greater Manchester; one at RAF Trebekzue and one at RAF Cleave, both in Cornwall; three at Exeter Airport; one at Thorpe Abbots Museum, Norfolk; one at the Imperial War Museum, Duxford (as mentioned above); one in Southsea (one of two from Portsmouth Old Airport which was relocated here for public display; the other may survive in situ). This suggests that approximately 45 examples survive in England, which is a relatively small number, although it is acknowledged that there may be more to discover, or more losses also.

The Pickett-Hamilton fort at the former Burtonwood Airfield was recently relocated approximately 600 metres south of its original location with Scheduled Monument Consent. It remains an intact example of an ingenious type of defensive structure specifically associated with airfield defence during the Second World War, of which only a small number survive. As part of the relocation, the fort has been restored and is now displayed in a manner that makes its form more visible, rather than its original arrangement where the majority of the structure was buried beneath the ground. While the fort remains on the site of the former Burtonwood Airfield, its relocation means that it is no longer in its original context, nor its original configuration, although it now benefits from greater accessibility by a wider audience. Given this change of location and context, it is considered that it is more appropriate to list rather than re-schedule the fort in its new location. It is therefore recommended that it is listed at Grade II.

In considering the fort during the reassessment we have considered whether powers of exclusion under s1 (5A) of the 1990 Act are appropriate, and consider that they are for the gambion cages and the hard-surface viewing area in front of the fort, which are modern additions associated with its display in the relocated position.

CONCLUSION

After examining all the records and other relevant information and having carefully considered the architectural and historic interest of this case, it is recommended that the Pickett-Hamilton fort at RAF Burtonwood Airfield (later USAAF base) is listed at Grade II and this designation replaces the previous designation as a Scheduled Monument.

REASONS FOR DESIGNATION DECISION

The Pickett-Hamilton fort at the former Burtonwood Airfield is recommended for listing at Grade II to replace the previous designation as an Scheduled Monument for the following principal reasons:

Relocation:

* the fort has been moved approximately 600m and so no longer has its original context, nor its original configuration, as it is now displayed raised with the sloping embankment cut away to show the originally hidden underground structure.

Protection:

* statutory protection is maintained, but the structure has been recommended for listing to reflect the more recent approach to designating certain types of modern military structures.

Countersigning comments:

Agreed. As this Pickett-Hamilton fort has been moved (and therefore has lost its original archaeological context) and is now displayed as a monument we recommend that it should be listed at Grade II as a rare surviving example of this type of Second World War defence nationally.
V Fiorato, 11 July 2019

Annex 1**List Entry****List Entry Summary**

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: Pickett-Hamilton Fort

List Entry Number: 1464711

Location

Pickett-Hamilton fort at SJ 56782 90304, Omega, Warrington

The building may lie within the boundary of more than one authority.

County	District	District Type	Parish
	Warrington	Unitary Authority	Burtonwood and Westbrook
	Warrington	Unitary Authority	Great Sankey

National Park: Not applicable to this List entry.

Grade: II

Date first listed:

Date of most recent amendment:

Legacy System Information

This section only relates to older records, created before the introduction of the National Heritage List for England in 2011.

Legacy System: Not applicable to this List entry.

Legacy Number: Not applicable to this List entry.

Asset Groupings

This List entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List Entry Description**Summary of Building**

Pickett-Hamilton fort of around 1940 on the former RAF Burtonwood Airfield, from June 1942 former USAAF base. Relocated to its present location at SJ 56782 90304 in 2019.

Reasons for Designation

The Pickett-Hamilton fort of around 1940 on the former RAF Burtonwood Airfield (from June 1942 a former USAAF base) is listed at Grade II for the following principal reasons:

Architectural interest:

- * as a specialist type of pillbox designed specifically for airfield defence, ingeniously remaining flush with the ground and raised to provide cross-fire in the event of an enemy attack;
- * the fort is largely intact, though no longer in working order, with the concrete firing platform, central hydraulic jack and pump mechanism surviving.

Historic interest:

- * the fort is a remaining reminder of the defensive measures Britain put in place to protect its airfields during the Second World War, here associated with RAF Burtonwood, which was transferred in 1942 to the United States Army Air Forces to become a servicing centre for their aircraft.

History

The importance of defending airfields against attack was realised before the outbreak of the Second World War, prompted by the Munich Crisis of 1938, and a strategy evolved as the war went on. Initially and during the outbreak of war this involved the dispersal of aircraft and other largely passive measures such as camouflage, sandbagging and the creation of some trench shelters and gas decontamination centres. Light anti-aircraft guns were installed at the perimeters of many airfields, but little more was built until the summer of 1940. At this point it was realised that airfields were extremely vulnerable to enemy attack. The scale of airfield defence depended upon the likelihood of attack, with those airfields in the south or east of England, and those close to navigable rivers, ports and dockyards being more heavily defended. A suite of defences, some to fire on attacking enemy craft and others to prevent airfield capture, were constructed such as pillboxes, machine gun posts, more substantial towers for Bofors guns and slit trenches. Fighter pens were provided for the aircraft, usually grouped in threes. Night fighter stations had sleep shelters where the crews could rest. An airfield's defence would have been coordinated from its own Battle Headquarters building.

Pillboxes (fortified gun positions) took many forms, from standard ministry designs used throughout Britain and in all contexts, to designs specifically for airfield defence. Three Pickett-Hamilton forts were issued to many airfields and located on the flying field itself. These forts were designed by engineer Francis Norman Pickett and architect Donald St Aubyn Hamilton. Their plans for a 'disappearing pillbox' for airfield defence were submitted to the Government by the New Kent Construction Company of Ashford in 1940, who then built many of the forts. Pickett-Hamilton forts were ingeniously designed so that they could remain flush with the ground surface to allow aircraft to move freely across the airfield, but could be manned and the forts raised to provide cross-fire in the event of an enemy attack. In cross-section they consisted of two reinforced concrete cylinders, one inside the other. The concrete lid of the smaller cylinder had a single access hatch through which two men could enter before raising the structure by a lifting mechanism (there were also rarer, four-man designs). The lifting mechanism initially consisted of a standard eight-ton aeroplane jack, but was then replaced by a compressed air system, which operated more quickly, supplemented by a hand pump for emergency use. It could be raised approximately 2.5 ft (0.75m), revealing three loopholes.

This Pickett-Hamilton fort was designed to form a small part of the defences for Burtonwood Airfield and was one of three constructed by 1941. Burtonwood had opened on 1 January 1940 as a servicing centre for British aircraft and was operated by No 37 Maintenance Unit, Royal Air Force, until June 1942. The airfield was then transferred to the United States Army Air Force (USAAF) to become a servicing centre for the United States Eighth, Ninth, Twelfth and Fifteenth Air Force aircraft.

The US Air Force use ended in 1959, with the site returned to the Ministry of Defence in 1965. In 1973 the M62 was built over the main runway. The site was officially closed in June 1994 and has been gradually cleared as new business development took place. The Pickett-Hamilton fort was scheduled in December 2002. In 2018 Scheduled Monument Consent was granted for the fort to be moved approximately 600m south to enable development of the site. After restoration the Pickett-Hamilton fort was relocated to this new position. It is now displayed raised and partially set into a sloping embankment, enabling more of the structure to be seen. An information board is due to be erected.

Details

Pickett-Hamilton fort of around 1940 on the former RAF Burtonwood Airfield, from June 1942 former USAAF base. Relocated to SJ 56782 90304 in 2019.

MATERIALS: concrete and steel.

PLAN: circular.

EXTERIOR: the fort has been moved to a different location on the former airfield where more of the structure has been made visible than would originally have been the case.

The outer concrete cylinder (which would have been sunk entirely into the ground with only the top surface visible) is only partly sunk into the ground, with the eastern side fully exposed. The inner concrete cylinder is fully raised. It has three horizontal rectangular loopholes and an overhanging, circular, concrete slab lid. The lid has an offset manhole with a steel cover.

INTERIOR: the fort retains the central hydraulic jack and original pump mechanism, which are no longer in working order. They have been sand blasted and painted to preserve the components. The hydraulic jack is encircled by a concrete firing platform on which the men stood to reach the loopholes. It is unclear whether the original metal rungs set in the outer cylinder wall, used to climb down into the fort, survive.

Pursuant to s1 (5A) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') it is declared that the modern gambion cages and hard-surface viewing area in front of the fort are not of special architectural or historic interest, however any works which have the potential to affect the character of the listed building as a building of special architectural or historic interest still require LBC and this is a matter for the LPA to determine.

Selected Sources

Other

Information about the former airfield and the fort from draft design for a display board to be displayed beside the relocated Pickett-Hamilton fort.

Map

National Grid Reference: SJ5678290304



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The above map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - 1464711_1.pdf