



Proof of Evidence  
**Vol 7 – Ecology**

Produced by Geoff Settle  
Rule 6 Party  
Peel Hall - APP/ M0655/W/17/3178530

## Contents

0	Peel Hall – Proof of Evidence - Ecology.....	2
1	Personal Details .....	2
2	Scope of Evidence .....	2
4	Site Land Management and current wildlife value.....	3
5	Net Environmental gain .....	5
6	Developer Proposals .....	6
7	Is there a better way? .....	7
8	Conclusion.....	7
	Appendices.....	8

## 0 Peel Hall – Proof of Evidence - Ecology

### 1 Personal Details

- 1.1 My name is Geoff Settle. I appear on behalf of the Rule 6 Party, I have lived in the area for 36 years at [REDACTED] and I was a ward councillor between 2010 & 2016. I have a degree in Geography and Economics, served on both the Mersey Gateway Environmental Trust and Mersey Forest and for the last 10 years I have chaired the Warrington Nature Conservation Forum.

### 2 Scope of Evidence

- 2.1 This proof covers wildlife and biodiversity. In May 2019, a UN report declared that human activity is causing an unprecedented decline in biodiversity, with more than a million species across the planet threatened with extinction. I will cover why wildlife and biodiversity are important in general and specifically to the people of north Warrington including how Covid-19 has revealed exactly how nature enhances physical health and mental well-being.
- 2.2 I will cover how the applicant has treated wildlife over several decades, but how despite this, the site contains a lot of wildlife despite the active mismanagement.
- 2.3 I will discuss the requirement for net environmental gain and how the proposals measure up and consider both on-site change and off-site mitigation measures.

### 3 The last great green wild space of Warrington

- 3.1 Peel Hall is a large site and is known as the “last great green wild space of North Warrington”. Local people spend their leisure time there enjoying the wildlife and habitat, walk, or run or ride horses across the fields. It is a place where they have gone to relax and improve their mental health and wellbeing for decades.
- 3.2 The landscape consists of a tapestry of woods, ponds, hedges, and grassland that is surrounded by the busy M62 and A49 to the north and dense housing around the rest of the area. It is the last remaining example of the way the landscape use to be in North Warrington. It has huge potential as the lung of north Warrington.
- 3.3 The recent coronavirus (COVID-19) pandemic has demonstrated the benefits of Peel Hall because during lockdown hundreds more people were out and about using the footpaths and wild areas they have trodden over many decades. When the landowner ploughed up the footpaths in April 2020 – at the height at the Covid-19 pandemic there was outrage. Perplexed, saddened, and angered people immediately began re-establishing what they consider as their paths. They even asked if the paths could be considered for inclusion on the rights of way definitive map so that the footpaths could receive some protection.
- 3.4 People posted their feelings about what the paths and place meant to them on Facebook pages with moving testimonies and photographs of the wildlife they saw (Appendix A). Photographs included foxes, raptors (birds of prey), herons, and wetland features. Many people on their walks noticed things they had not seen before.
- 3.5 Jean Hall said *‘I have been on furlough from work and would have gone stir crazy had it not been for walking my dog every day across Peel Hall. It helps clear my head listening to the sounds of nature. Shame its been ploughed over though’.*

- 3.6 Sammy Dobson said *"I'm struggling to comment as it's so upsetting to think it might all disappear, 😞 I can spend hours just watching the bird life, buzzards , kestrel , sparrow hawk, and the last 5yrs a sky lark which has now GONE."*
- 3.7 The Environmental Bill states that *"people care about wildlife in its own right'* and that *'our ecosystems and their component species – plays a vital role in climate change mitigation, by removing, trapping and storing carbon, as well as in pollination, flood alleviation, and public health and wellbeing.'* All these considerations apply to Peel Hall
- 3.8 Local people can and certainly do relate to these comments, aims and objectives.

## 4 Site Land Management and current wildlife value

- 4.1 Although poorly drained, the site has a long farming history. There is evidence of a Medieval Moat at Peel Hall that was unearthed during an exploratory dig in 2001 by Lancaster University Archaeological Unit. Cheshire Archaeology Planning Advisory Service have stated that **Peel Hall moat** is of County Interest (Appendix B) and no development should take place within the area until a programme of archaeological work has been secured.
- 4.2 Very soon after the current owner acquired the site farming ceased, and fields were abandoned as the applicant had no interest in land or wildlife, just the profit they could make from development. There have been three or four occasions when machinery has been brought on to spray the land and turn it over without any benefit to nature and simply to destroy any wildlife value that might reduce development profits. The applicant has no interest in wildlife or the local community.
- 4.3 In 1999 the developer cleared the fields of self-seeded saplings and bushes that had taken root, flourished, and were developing into woodland. The greenery was put into piles and set alight and the smoke from the fires billowed across the M62 causing motorists all sort of problems. A fire appliance was called out to extinguish the fires.
- 4.4 During the bird nesting season of 2016/17, the land was sprayed and as recently as April 2020 the fields were ploughed but not in preparation for any planting. Just to stop people using the land. And this, despite the worst peacetime emergency we have ever faced, when people needed to exercise and get out into the countryside for their well-being.
- 4.5 The spraying operation was filmed by a drone showing what appears to be a ground nesting bird flying down to its nest in front of the spray machine, protecting its young. The driver of the large yellow spray machine just carried on spraying and there was no movement from the bird afterwards, as can be seen on the footage. (Appendix C). This incident was reported to the police however they were reluctant to act without more evidence.
- 4.6 I believe that a responsible landowner should be taking every action they can to protect the environment and encourage the increase of local biodiversity, they should not be reducing or destroying it.
- 4.7 We just need to look one kilometre away, the other side of Delph Lane, to see how the local wildlife site of Houghton Green Pool has prospered over the years. It has had its battles with changing levels of the Pool, but it has fought back through a massive increase in self-seeding trees. There are around 10 concentric rings of 16,000 beech and willow growing around the Pool. In 2017 over one thousand common spotted orchids blossomed around the western

perimeter attracting many thousands of butterflies and insects. The place shows that if left alone nature can grow and prosper. The Peel Hall site would look like this.

- 4.8 Even with the best of intent, things do not always turn out the way that they are expected after development takes place. A large pond outside Cinnamon Brow Farm disappeared as brooks dried up and stream beds became dry. This was because rainfall was directed into the new drainage system and away from the pond. This demonstrates that if Peel Hall is developed, habitats proposed for retention may just disappear anyway, particularly as land drainage patterns change.
- 4.9 Evidence provide to the last PI in 2016 contained over 282 different species which can be broken down into 110 species of Bird, 84 flowering plants, 4 Fungi, 7 Beetle, 14 Butterflies, 4 Dragonflies, 6 Bees, 6 moths, 2 grasshoppers, 31 bugs, 101 flies, 2 molluscs, and 7 mammals.
- 4.10 Of the 110 species of birds, eight were on the critical Red at risk list and include Skylark, Grey Partridge, Grey Wagtail, Pochard and Woodcock. These birds are facing increasingly severe declines in breeding populations across the UK, so it is good that they have found a haven at Peel Hall. There were twenty-seven birds on the amber list of which examples include Black-necked Gleebe, Common Sandpiper, House Martin, Willow Warbler, Kingfisher, and Tawny Owl whilst not under so much of a threat as the red list but are at a high risk and just as welcome at Peel Hall.
- 4.11 Surveys have shown that Peel Hall supports a population of great crested newts. A mitigation plan has been put forward as part of the amended ES. However given the record of the applicant in deliberately destroying wildlife, and the potential constraint GCN are on development, together with inevitable hydrology changes after development it is impossible to see a situation where the GCN colony would even survive, let alone thrive.
- 4.12 The site is of value several important bird species, including at least 8 'priority' species for conservation. Loss of and fragmentation of habitat is likely to affect the local population status of at least some of these species by reducing opportunities for feeding and nesting.
- 4.13 The site also supports valuable foraging habitat for local bat populations. The loss of certain habitats to the development (notably ponds, watercourses and woodlands), and the fragmentation of the landscape, without sufficient mitigation, is likely to affect the nature conservation status of local bat populations by reducing the local feeding resource.
- 4.14 The field study provided by the developer picks up on several mammals that would be expected to be found on site but do not appear present when the habitat is suitable for example badger and water vole. These may be present but have been missed (for instance an inactive badger sett was found). The most likely answer is the land management practice that the developer has pursued to deliberately deter wildlife.
- 4.15 Another mammal that has been proving elusive is the hedgehog. In 2013 several hedgehogs were found injured close to Peel Hall, maybe because of work being done on the site. They were taken to the local hedgehog rescue centre (now closed) in Padgate for treatment. The centre was visited at the time by David Lindo when he came to film in the North West wildlife as part of the BBC North West Urban Jungle TV programme highlighting the hard work of the hedgehog centre saving local wildlife and promoting conservation. It would appear that none of the hedgehog details were entered into RECORD at the time.

- 4.16 The good news is that this year (2020) there have been sightings in people's gardens and the animals have been seen crossing local roads near the site. Healthy hedgehogs have been seen during May and June wandering into people's gardens in Coldstream Close, Radley Lane and Gairloch Close whilst others have been seen crossing Ballater Drive from the playing fields, so they are active healthy and doing well this year. Given they often walk as much as 2 miles a night they are probably once more active on Peel Hall, but a survey would have to be done during the evening and into the night to confirm that they are once more on Peel Hall.
- 4.17 Continuing the positive theme, a huge number of moths have been trapped by the Peel Hall Conservation Group's George Dunbar in a local garden over a 5 year-year period leading up to 2019. RECORD only shows 6 moths whereas George's list is 106 (Appendix E). Many are not found so far north.
- 4.18 Local ecologist Rob Smith from Culcheth said on reviewing the records, **"It's an impressive moth list for such a narrow window of trapping, goes to show the potential of the area?"**

## 5 Net Environmental gain

- 5.1 The National Planning Policy Framework (NPPF), requires a measurable net environmental gain and the forthcoming Environment Act will require new developments to improve biodiversity value by at least 10 per cent.
- 5.2 The developer makes much of the technicality that the Environment Bill has not passed into law and that Net Environmental gain is not a formal legal requirement. However, the concept is accepted by central and local Government, ecologists, other professionals within the built environment and most of the construction industry. If Peel Hall is developed, the houses and the environmental consequences could still be around in 100 years or more. It seems bizarre that this Inquiry would accept a lower standard that we know will lead to environmental degradation and accelerate the crisis we already know exists around wildlife and biodiversity in Britain.
- 5.3 The developer provides an offsetting report. It does NOT say that the scheme will result in a net biodiversity gain, but concludes (5.12), just that this is theoretically possible although *'it is recognised that further stakeholder engagement is required along with off-site baseline surveys of potential compensation sites.'* One wonders why this stakeholder engagement, site identification and baselines surveys have not been carried out. In the absence of this evidence it is hard to see how the applicant can claim any biodiversity gains.
- 5.4 There are further serious flaws. The current site is a large, interconnected area which adds greatly to its wildlife value, but this will be completely fragmented by development – habitats and species will become isolated islands, and much more likely to die out as populations fluctuate.
- 5.5 In calculations of current wildlife value, the Offsetting Report uses the current relatively impoverished state of the site. This state has been deliberately created by site management practices intended to reduce the wildlife value.
- 5.6 Biodiversity gain appears to include 'Suburban mosaic of natural/developed surface' (82 units of gain). It is not obvious what this is, but it doesn't sound like a natural habitat.

- 5.7 GMEU conclude that *'Currently I would regard the amount of mitigation and/or compensation for impacts on local nature conservation impacts as insufficient, ... the full details of the development, including landscape and habitat creation, are unknown. I would recommend that proposals for a new, meaningful area of enhanced, un-fragmented, semi-natural greenspace, either on or off-site, should be put forward as compensation for lost habitats and green infrastructure and to achieve biodiversity net gain.'*
- 5.8 Off-site mitigation measures are not detailed – we can't be sure they will be delivered, establish or be maintained over 30 years and in any case they will be remote from existing and future residents. GMUE suggest that *'Currently the plans do not appear to include the provision of any significant new, un-fragmented areas of semi-natural greenspace incorporated into the scheme that could be managed for people and for nature conservation. Much of the greenspace shown on the outline plans is existing space which will be retained. The proposed new strip of landscaping along the northern boundary will function much more as a noise and landscape screen between the motorway and the new development rather than functioning as an effective area for public recreation or wildlife, although it is referred to in places as an ecology park '.*
- 5.9 The site was included by the Greater Manchester and Cheshire LNPs (local nature partnership) in the Greater Manchester Wetlands Nature Improvement Area (NIA). The developer proposes miniscule wetlands enhancements and as explained elsewhere, development will change the hydrology of the area such that existing wetland may degrade further.
- 5.10 The predicted condition of proposed habitats is based on assumed conditions 30 years after development (Offsetting report 2.24). This means for any theoretical biodiversity gain to materialise will take 30 years.

## 6 Developer Proposals

- 6.1 Large developments like this take the approach of building as many properties on a space as possible and wildlife is treated as an afterthought. There have been numerous failed attempts to get permission to build on this land over the last 30 years and none have proposed any benefit to wildlife or any solutions to their issues both now and in the future.
- 6.2 The developer proposes an 'Ecology Park', although the sketchy details so far suggest that this is an abuse of the term. It is not clear what is meant by this term or what its aim is other than perhaps a nod to wildlife. They appear to propose to landscape an undevelopable area hard up against the M62 that they could not use any other way. It is hard to imagine wildlife surviving such conditions alongside the pollutants, noise and light next to the M62.
- 6.3 A green bund, rather than artificial acoustic fences, was built a kilometre away at Cinnamon Brow between the Poulton Golf course and the M6. It is now a mature woodland protecting the houses of Cinnamon Brow built during the New Town Development.
- 6.4 It is even harder to imagine humans (which are also animals) living in these conditions either. I wouldn't want to read about another asthmatic death like Ella Kissi-Debrah. (Appendix D)

## 7 Is there a better way?

- 7.1 It is not contested by the applicant that their proposal would mean significant habitat destruction. But if more trees were planted on the Peel Hall land it could become a mini carbon sink, capturing the fumes from the M62 traffic and soaking up the rainfall throughout the year. The place is already regarded as a green lung by the local community and a great amenity that could be enhanced if protected and managed as a green resource.
- 7.2 Peel Hall is now in the newly designated Northern Forest where there is a joint aim between the Mersey Forest and Woodland Trust to plant 50 million trees between Liverpool and Hull, the M62 has been designated as the spine of the project. The project has government support and initial funding and planting began in 2016 again. Peel Hall would be an excellent place to be part of that vision. Trees bring many benefits, they produce oxygen, help cleanse the air by intercepting airborne particles acting as a filter, clean the soil, control noise pollution, lock away carbon dioxide, provide shade and cooling, acts as a windbreak and fight soil erosion, soak up rainfall and of course help increase biodiversity by attracting and sheltering all sorts of fauna and flora.
- 7.3 We feel that a development built in the human scale 'Compact City' style that is common in other northern European countries in towns like Warrington, and of which there are some examples in Britain would allow a significant number of houses to be built near the A49, close to amenities, and a fast and effective bus route. This would allow the remainder of the site to become a Forest Park as part of the Northern Forest.
- 7.4 Peel Hall is ideally placed to contribute to mitigating the impact of traffic pollution, light at night and noise from the M62 using nature, rather than making a large number of people live next to it.

## 8 Conclusion

- 8.1 In conclusion.
1. Wildlife and biodiversity are important in general and specifically to people of north Warrington
  2. Covid-19 has revealed exactly how important the chance to enjoy nature is to physical health and mental well-being
  3. The developer has actively tried over several decades to destroy biodiversity on site to maximise its development value. They are no friend of nature.
  4. The site contains a lot of wildlife despite the active mismanagement – think how much more biodiversity there would be with a more enlightened owner
  5. Environment Bill requires net environmental gain. The development will be here for 100+ years. The PI should accept 110% (as Government and the housebuilding industry does) as the standard to judge the scheme.
  6. The proposals are mean to wildlife. Isolated, bog standard spec builders landscaping is not a replacement for genuinely wild habitats. They don't even meet a requirement for net environmental gain.
  7. Off-site mitigation measures are not detailed – we can't be sure they will be delivered, establish or be maintained over 30 years and in any case they will be remote from existing and future residents.



8.2 The proposed Peel Hall application fails to deliver any ecological benefit. It is the wrong plan for the wrong location and will simply add issues to the area and resolve none. Trying to deliver a housing solution for 1,200 properties and add-ons will have a disastrous impact on wildlife and will place too much pressure on what will be left of the natural habitat, the rest having been dug up and built on.

End of main document, appendices follow.

## Appendices

Appendix A – Residents Testimonials – see attached

Appendix B – Peel Moat Documents – see attached

Appendix C – Crop spraying machine footage Chris Digas – on **Warrington Worldwide** – (24<sup>th</sup> May 2016) <https://www.warrington-worldwide.co.uk/2016/05/24/wildlife-destroyed-by-developers-claims-former-mayor/>

Appendix D - <https://www.bbc.co.uk/news/uk-england-london-48132490>

Appendix E – Moths trapped by George Dunbar

***For the complete collection see his spreadsheet (Appendix E) attached.***

The following are moths that caught which are noteworthy.

They are mainly found in the Southern half of Britain but good to see that they have been found in the north west.

Triple-spotted clay

Dingy footman

Suspected

Beautiful hook-tip

Small ranunculus – formerly thought to be extinct but now recovering

Red twin-spot carpet

Barred Sallow

Chocolate-tip

Dwarf Pug

Marbled white spot

Round-winged muslin

Obscure wainscot

Red-necked footman

Buff footman

Grey shoulder-knot

Silky wainscot

## Appendix A – Testimonials

### 1. Neil R Stanley

We first arrived in Cinnamon Brow in 1986 - the New Town was still new as were most of the roads, houses and other infrastructure. The open space at Peel Hall has always been there. Yes we have the more structured areas at Peel Hall and Enfield parks but the fields and adjacent woodlands are the wilder and more natural local spaces.

Whilst you are working you don't always have the time to spend out and about locally but since retirement (7 years ago) I have made up for this, making sorties into the area, getting exercise and indulging in my passion for photography, trying to get images of the birds, flowers and other aspects of this wild space. We have our regular buzzards, kestrel, swifts, whitethroat and chiffchaff, and the hunt for bluebells, orchids and dragonflies is an important part of seasonal life.

This area has been particularly important at this time of lockdown when we have been discouraged, and even prevented, from travelling outside our locality.

Peel Hall is a natural lung for this part of Warrington and if we lost it we would have no other similar local wild open space to enjoy. Space that can be reached on foot from a wide area of already very congested residential development.

### 2. Debbie Peppert

Both us and our neighbours have been frequently walking through the woodland Areas round Peel Hall. We also used the Mill House field to play football with our little boy and teach him to ride without stabilizers. It's a shame the footpaths are not better maintained as we also realised that you can walk/ cycle over to Winwick without walking down the Narrow Delph Lane road. There is so much opportunity here to improve the green space availability to North Warrington that will be lost if this development goes ahead.

### 3. Gary Wernham

I absolutely love Peel Hall and go there most days with my dogs usually about 7am. Sometimes I walk through to Elm Avenue or alternatively I go over the footbridge to Winwick. The dogs love it too, there is something magical about this place. It's not uncommon to see foxes, lots of rabbits the place abounds with wildlife. I was saddened to see that Satnam had sanctioned this beautiful place to be ploughed destroying the footpaths and any creature that got in its way. What a disgrace. So yes, please count me in too I will do anything to help prevent this land from being developed it's too special for that.

### 4. Jean Hall

I have been on furlough from work and would have gone stir crazy had it not been for walking my dog every day across peel hall. It helps clear my head listening to the sounds of nature. Shame its been ploughed over though.

### 5. Joan Rogers

The field on Ballater drive has been so used during covid. Kids parents dog walkers and many more. People are driving in as the green spaces are far and few. Don't steal it from the next generation.

#### 6. Mary Burke

We have a dog who loves to walk - hubby has taken him out first thing then I take him out at lunchtime -as I have MS I can't walk very far but I can get into Peel Hall Park on my mobility scooter so that has given the chance to exercise the dog and see more butterflies in a few years as well as some beautiful wild flowers. I've even been waving to new friends as we go to the park at more or less the same time.

#### 7. Pauline Parr

When I was 5 years old we moved to [REDACTED] it was a brand new house that faced the opening which led to Peel Hall. Myself and my friends would play all day in the fields and blue bell woods. At weekends and holidays my parents myself and baby sister would walk over the fields to the Plough where we would sit around the bowling green and play on the swings and very often we would carry onwards to Croft where my Aunt lived . It's lovely being able to go back and walk the same route whilst reminiscing getting exercise ,breathing the fresh air, peace and quiet and just appreciating the flora and fauna and the beautiful sound of the birds singing this is the best medicine for our health and well-being and we must not let it be taken from us .

#### 8. Phil Kemp

I live on [REDACTED] and prior to the lockdown I regularly saw people going past my house making their way onto the Peel Hall land. These were families out for a walk, dog walkers, ramblers and runners, the latter including myself.

Since the lockdown this has increased significantly to almost a constant stream of people going past to make the most of this valuable green space.

Also, because of the reduction in both local and motorway traffic there is a distinct increase in the wildlife in the area. We have had hedgehogs in our garden for the first time and a major increase in birds, specifically Swifts and Raptors.

I believe that people should have the right to continue to enjoy this green space in the future, because like we say, once its gone its gone forever.

#### 9. Rob Shaw

Here's our recent experience of how having this beauty spot right on our doorstep has helped us.

My daughter has used the Peel Hall area to complete her assignments for A-Level Photography.. we obviously couldn't travel anywhere so to have it on our doorstep was a godsend for her (and us) as it has meant that she found being in lockdown and preparing her coursework for her a-levels next year much less stressful.

Unlike the students who would have been taking their exams this year, she won't get any help with the studies she has missed because she isn't doing her exams until next year. The coursework still had to be completed. This had been stressing her out - which, as you can imagine, caused some friction at times.

It has also genuinely brought her and her younger sister closer during the current lockdown too because they have been going out together to explore the area for the 'perfect picture'.

To be able to get some advancement of her education and combine that with the essential exercise we all need at the moment more than ever has been an absolute blessing.

I would certainly hate to think what problems we would have had at home sometimes over the past 8 weeks or so - and counting- with six of us being cooped up in the same house 24/7 without having somewhere local to escape to and get some 'edu-cise'.

#### 10. Sammy Dobson

I'm struggling to comment as it's sooo upsetting to think it might all disappear, 😞 I can spend hours just watching the bird life, buzzards , kestrel , sparrow hawk , and the last 5yrs a sky lark which has now GONE as of this year it's not been seen or heard I moved in 10 yrs ago and on my first day in my house I turned to see a male fox walk up my path and cock it's leg up against the hedge ...being and massive animal lover I nearly had a heart attack I'd never seen one so very close up ...just you know having a wee 😊!

I knew then this is the perfect home for me and my son,to grow up and old in,never dreamed it might all be gone one day,I just pray its NOT in my life time 😞XXX amen xx

[REDACTED]

Wendy Johnson-Taylor

Date: 02 June 2020 [REDACTED]

---

Dear Wendy,

Thank you for your enquiry to the Cheshire Historic Environment Record (HER) for further information on Peel Hall, Winwick.

#### HER records

I have enclosed the details of the site (monument) recorded on the HER. (See attached MonFullRpt.pdf) I also enclose the details of 3 surveys and interventions (events) whose associated reports contain information yet to be incorporated into the HER monument record. (See attached EventFullRpt.pdf)

#### Please note:

- By accepting this information, you agree to the licence outlined in the enclosed Conditions of Use and Licence for Re-use of information (see *ConditionsOfUse.pdf*). A copy of the final report or research should be submitted directly to the HER at the address above.

Please find below the consultation response to planning application 2016/28492 by APAS (Archaeology Planning Advisory Service) on 17/08/2016. This can also be viewed on the Warrington Borough Council planning application website.

**Planning Application: 2016/28492 - Land at Peel Hall; Land South of M62 bounded by, Elm Road: Birch Avenue; Poplars Avenue; Newhaven Road; Windermere Avenue, Grasmere Avenue; Merewood Close, Osprey Close Lockerbie Close, Ballater Drive and Mill Lane**

Thank you for your consultation concerning the above application which is supported by and archaeological desk-based assessment which has been prepared by Nexus Heritage on behalf of the applicants.

This study which appears as Chapter 10 of the accompanying EIA considers information held on the Cheshire Historic Environment Record. It also contains a consideration of the evidence from the historic mapping, aerial photographs, and studies concerned with earlier proposals for the development of the site. In particular, it draws on the conclusions of a programme of field evaluation carried out by the Lancaster University Archaeological Unit in 2001 in connection with earlier proposals for the development of the site.

This work successfully identified the areas of archaeological interest which are focussed on the land immediately to the south of Peel Hall, which contains the remains of a medieval moat (CHER 595) at SJ6154 9185 and an area of undated ditches extending over an area of c 50m by 50m in the north east corner of the application area at SJ 6199 9187 which may represent an area of earlier settlement.

Both of these sites lie within the latest and application area and, on present evidence, it is likely that they will be damaged or destroyed by the proposed development. It is advised, therefore, that if planning permission is granted, these two area should be subject to programmes of archaeological mitigation which ensure that the archaeological remains present are excavated and fully recorded before the land which they occupy is developed. In the case of the moated site at Peel Hall, this is likely

to involve the formal excavation of the moated platform and surrounding ditches whilst the north-easterly site should be subject to a strip and record exercise extending across an area measuring c 50m by 50m. A report will also need to be produced and the work may be secured by condition, a suggested wording for which is given below:

No development shall take place within the area indicated until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority. The work shall be carried out strictly in accordance with the approved scheme.

The use of such a condition would be in line with the guidance set out in Paragraph 141, Section 12 (Conserving and Enhancing the Historic Environment) of the National Planning Policy Framework (2012), published by the Department for Communities and Local Government and Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2 (Historic England 2015).

The Cheshire Archaeology Planning Advisory Service does not carry out archaeological work and the applicants would need to appoint their archaeological consultant to organise the mitigation. The Service will be able to provide further details of the work on request.

Mark Leah  
Development Management Archaeologist and Team Leader  
Cheshire Archaeology Planning Advisory Service Cheshire Shared Services

Yours sincerely

Moya Watson  
Historic Environment Record Officer



