

Green and Grey Belt Appraisal Ince Park, Grinsome Road, Ellesmere Port

August 2025



Turley

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Client
PEEL NRE
Our reference
PEEM2101

August 2025

1. Introduction

- 1.1 This report presents the Turley Landscape appraisal of a Site located on land that falls within Peel NRE's ownership nearby to Ince and Elton villages within the local authority of Cheshire West and Chester. The purpose of the report is to provide an assessment of the contribution of the Site to Green Belt purposes and whether it meets the criteria of 'grey belt' land as set out in the National Planning Policy Framework (NPPF) (December 2024) and supporting Planning Practice Guidance (PPG) (February 2025 update).
- 1.2 The Site predominantly comprises agricultural land and the red line boundary is illustrated in **Figure 1.1**. The blue hatched area indicated on **Figure 1.1** represents ecological improvement areas that are currently being established under the existing planning permission for Protos.

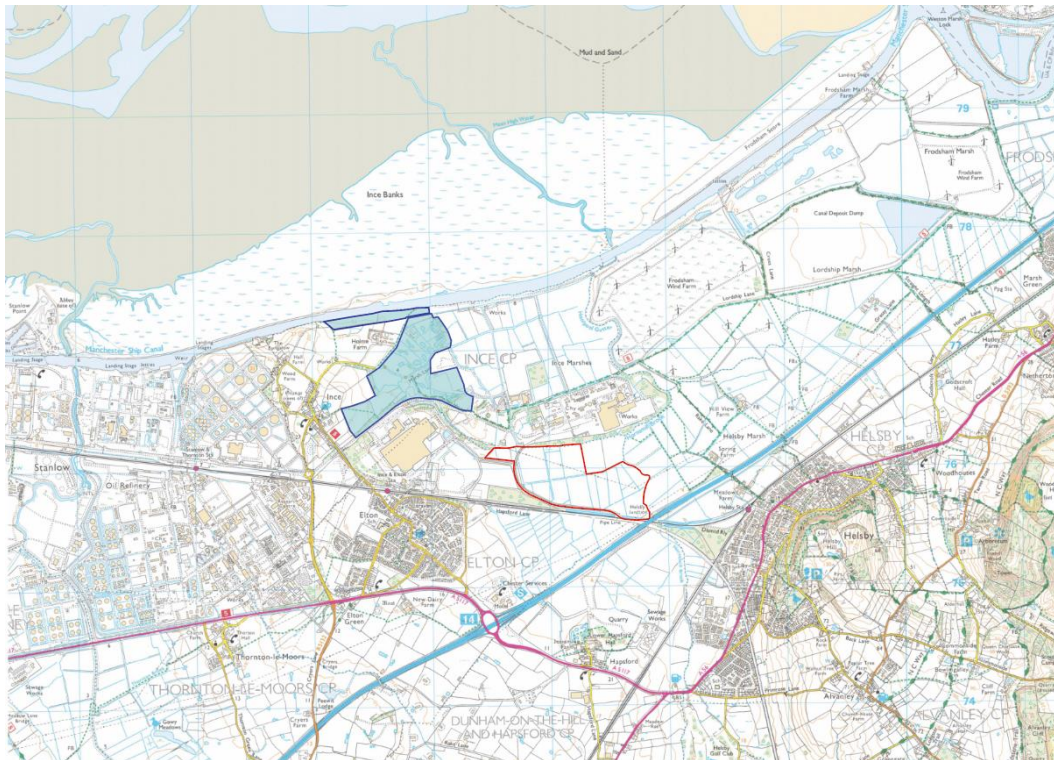


Figure 1.1: Site plan (red line boundary) overlaid on to Ordnance Survey mapping, to illustrate the wider context. Blue hatched areas denote ecology areas established under existing planning permission for Protos

Approach and Methodology

- 1.3 The revised NPPF (December 2024) introduced a new sub-type of Green Belt which is referred to as grey belt land and is defined as:

'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'

- 1.4 Supporting guidance on the methodology and criteria to be used when undertaking green belt assessments and identifying grey belt land was provided in a PPG update on Green Belt (February 2025). This report provides an assessment of the Site against the confirmed definition of grey belt set out in the December 2024 NPPF and uses the criteria and methodology set out in the new PPG. It has been informed by a desktop appraisal of relevant mapping and background documents, undertaken in August 2025.

- 1.5 The grey belt assessment has been undertaken in two stages. The first stage assessed whether the land makes a 'strong contribution' to any of Green Belt purposes: a) – restricting urban sprawl; b) – preventing towns from merging or d) preserving the setting and special character of historic towns. The assessment has been informed by the PPG which provides guidance on illustrative features that should be considered when making judgements on the level of contribution for each of these purposes. An extract from the PPG is included in **Appendix 1** to this report. The first stage also assessed whether applying the policies relating to the areas or assets of particular importance identified in footnote 7 to paragraph 11 of the NPPF could potentially provide a 'strong reason for refusing or restricting development on the Site'.

- 1.6 The second stage of the grey belt assessment was undertaken to assist in judging whether proposed development in this area could be regarded as 'not inappropriate' development in the Green Belt in the context of NPPF paragraph 155a. This comprised a judgement on whether potential development on the Site would 'fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan¹'. Planning strategy advice should be sought in relation to the compliance with NPPF paragraph 155b-d.

¹ NPPF para 155a

2. Appraisal of the Site

The Site

- 2.1 The Site falls within the Ince area of Cheshire West, to the east of the village of Ince; to the north-east of the village of Elton; and to the immediate east of the Stanlow Oil Refinery and Thornton Technology Park. The Site is set within a corridor of land between the M56 motorway which runs south-west/north-eastwards, the Manchester Ship Canal and the stretch of the Northern Railway line running between Helsby and Stanlow & Thornton stations. The Site abuts Helsby Junction where the M56 bridges over the railway line. The Protos Resource Recovery Park is located to the north of the Site, with Ince Marshes and Goldfinch Meadows open space to the north and west respectively.

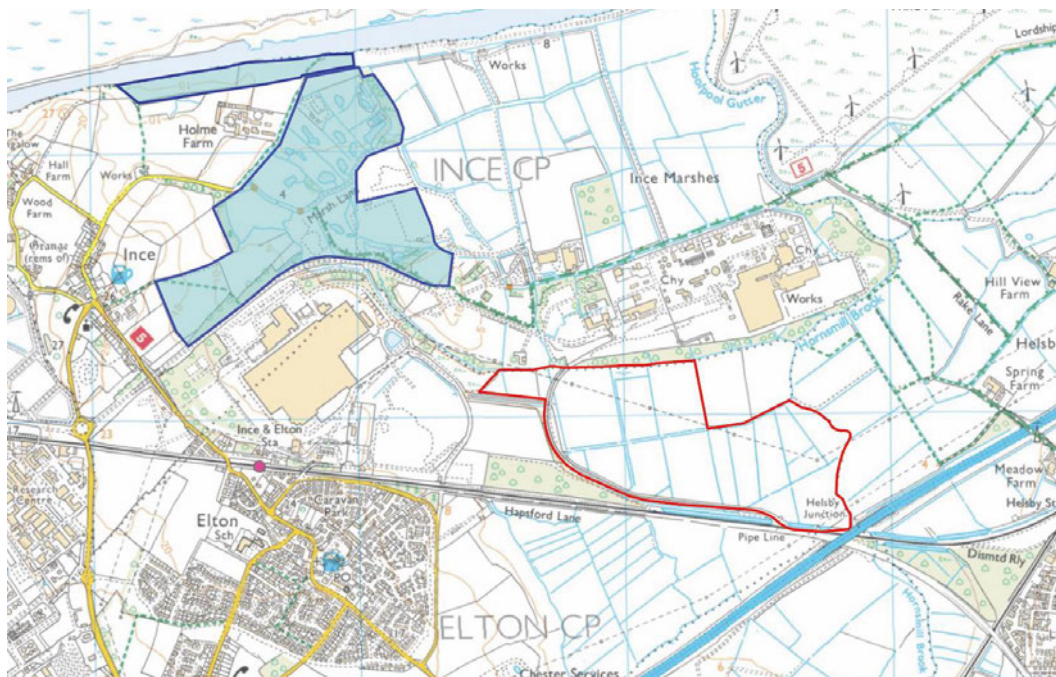


Figure 2.1: Site plan (red line boundary) overlaid on to Ordnance Survey mapping, to show the 3 sites in more detail than Figure 1.1. Blue hatched areas denote ecology areas established under existing planning permission for Protos

- 2.2 The Site is a collection of agricultural land parcels, measuring c.50.5 hectares set either side (north and south) of an access track (Elton Lane) which connects from the entrance route to the industrial estate on Ash Road (mainly used by Encirc Glass manufacturing), eastwards to further agricultural land around Boow Norman Farm (accessed off Rake Lane). The fields are sub-divided by a series of drainage ditches (extending from/to Hornsmill Brook on the northern boundary) some of which appear to be densely planted, and others which comprise rough grassland verges). The northern boundary is separated from the former CF Fertilisers Plant by the Brook, as well as dense tree and scrub planting. Frodsham Wind Farm West Substation is located to the immediate north west

and a large area of hardstanding, currently being used for heavy good vehicle parking, lies adjacent to the west. The vegetated edges of the local road network and M56 motorway (to the south-eastern corner of the Site) screen views into the Site. There are no public rights of way crossing the Site. There are a series of Public Rights of Way to the east of the Site (including refs: Helsby FP8, Helsby FP9, and Helsby FP27), providing accesses through the Boow Norman Farm landscape. An aerial image of the Site to illustrate the landscape features is shown below (**Figure 2.4**):



Figure 2.2: Plan of the Site (red outline) indicatively overlaid on to aerial mapping. Blue hatched areas denote ecology areas established under existing planning permission for Protos. (Map source: Google)

3. Part 1: Does the Site meet the definition of grey belt land?

Introduction

3.1 As illustrated by **Figure 3.1** below, part 1 of this report makes an assessment of whether the Site can be identified as grey belt, in line with government guidance. The first part of this chapter considers whether the land contributes strongly to Green Belt Purposes a, b and d. The second part appraises whether there are areas or assets of importance (identified in footnote 7 to the NPPF) within or close to the Site which would provide a strong reason for refusing or restricting development.

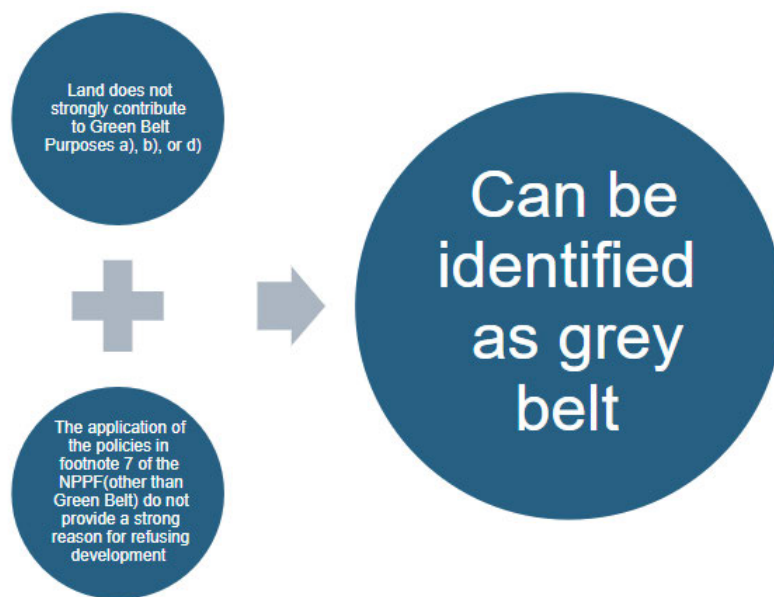


Figure 3.1: Extract from the Green Belt Guidance: 'Figure 1. When can land be identified as grey belt'. Paragraph: 007 ID: 64-007-20250225

Green Belt Context

3.2 Cheshire West and Chester Green Belt Study (Parts 1 and 2, March 2016) form the Council's latest Green Belt Study. However, this focuses on land around Chester and neither Part 1 nor Part 2 provides an assessment of the wider Green Belt outside the fringes of Chester. It is understood the Council will be preparing a Green Belt Assessment to support the evidence for the preparation of a new Local Plan. As a result, no assessment of the Site or the Green Belt around Ince, or other settlements within the area including: Elton and Helsby, has been carried out by the Council.

Green/grey belt appraisal of the Site

Contribution of the Site to Green Belt Purposes a, b and d

3.3 To meet the definition of ‘grey belt’, land must be previously developed land and/or, not contribute strongly to Green Belt purposes (a), (b) or (d). The Green Belt context of the Site is illustrated in Figure 3.2 below and the contribution of the Site to purposes a), b) and d) is then considered below in Table 3.1. This assessment is based on the approach and criteria set out in the PPG on Green Belt (published February 2025), the criteria of which is enclosed within Appendix 1.

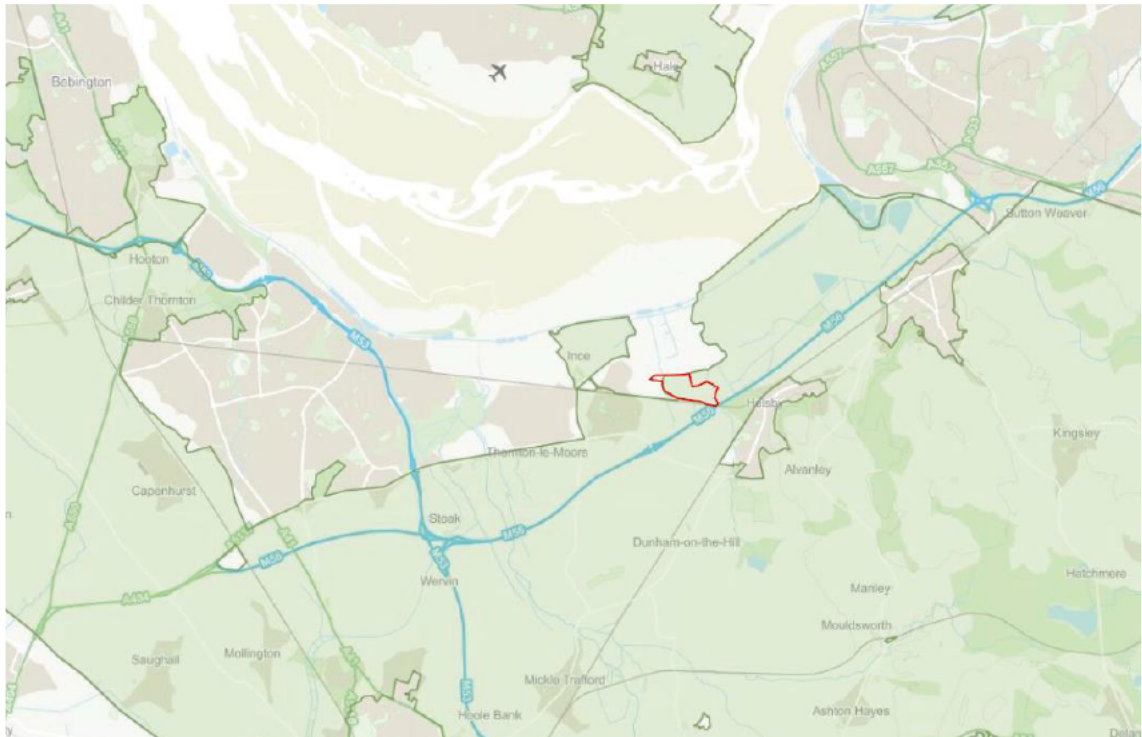


Figure 3.2: Green Belt context (source: English Local Authority Green Belt Dataset, December 2024). The Site is shown indicatively with a red outline

Table 3.1: Assessment of Site against Green Belt Purposes a, b and d

Purpose	Assessment of contribution of the Site to Green Belt Purpose
(a) To check the unrestricted sprawl of large built-up areas	<p>Large built-up areas are defined and interpreted differently and there is no specific definition for Ellesmere Port, however the town is identified within the Chester Green Belt Study (Part 1) as being a key objective for the Green Belt in this location and given the scale and extent of this area, Turley considers that it does constitute a large built-up area.</p> <p>Stanlow is separated from the town of Ellesmere Port by the M53 motorway, however in terms of</p>

perceived continuous built form, there is a potential for Stanlow to be defined as part of Ellesmere Port. For the purposes of ensuring a robust process is followed, Turley has appraised the scenario that Stanlow is deemed by Cheshire West and Chester Council to form the eastern edge of the large built up area of Ellesmere Port.

The Site is approximately 1.5km to the east of the area of Ellesmere Port/Stanolw and therefore meets the PPG description for a **Weak** contribution to checking the unrestricted sprawl of large built-up areas since it is not adjacent to or near a large built-up area.

(b) To prevent neighbouring towns from merging into one another

The closest settlements to the Site are defined as villages (Ince, Elton and Helsby) and are therefore not relevant to this purpose. The nearest towns are Ellesmere Port (c. 5.3km to the west), Frodsham (c. 4.1km to the north-east) and Chester (c.6.6km to the south-west). There are significant areas of open landscape to the east of the Site and the nearest town of Frodsham and the Site does not make a contribution to the visual separation between Chester and Ellesmere Port.

The Site as a whole therefore meets the PPG description for a **Weak** contribution to preventing neighbouring towns merging into one another since it forms only a very small part of the gap between towns, without making a contribution to visual separation.

(d) To preserve the setting and special character of historic towns

Weak – the Site meets PPG description for a weak contribution to preserving the setting and special character of historic towns.

Ellesmere Port Docks conservation area lies approximately 6km to the north-west of the Site and is effectively separated by the Stanlow industrial estates. Frodsham Town conservation area lies c.3.8km to the north-east of the Site, on the opposite side of the M56 motorway and separated by expansive tracts of open landscape. There are no important visual, physical and experiential relationships between the Site and historic aspects of the closest towns.

3.4 In conclusion, the Site is not considered to perform strongly against the Green Belt purposes a), b), or d).

Relevance of National designations and Footnote 7 areas/assets of importance to the Site

- 3.5 Land defined as grey belt excludes areas ‘where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development’. The Site has therefore been reviewed against the areas/assets of particular importance identified in ‘footnote 7’ of the NPPF below with a summary provided in **Table 3.2**.
- 3.6 The current Environment Agency flood map² (**Figure 3.3**) shows that the Site is set entirely within flood zone 3. There also appears to be areas of surface water flooding risk within the Site, primarily associated with the drainage ditches and Hornsmill Brook, as shown on **Figure 3.4**.

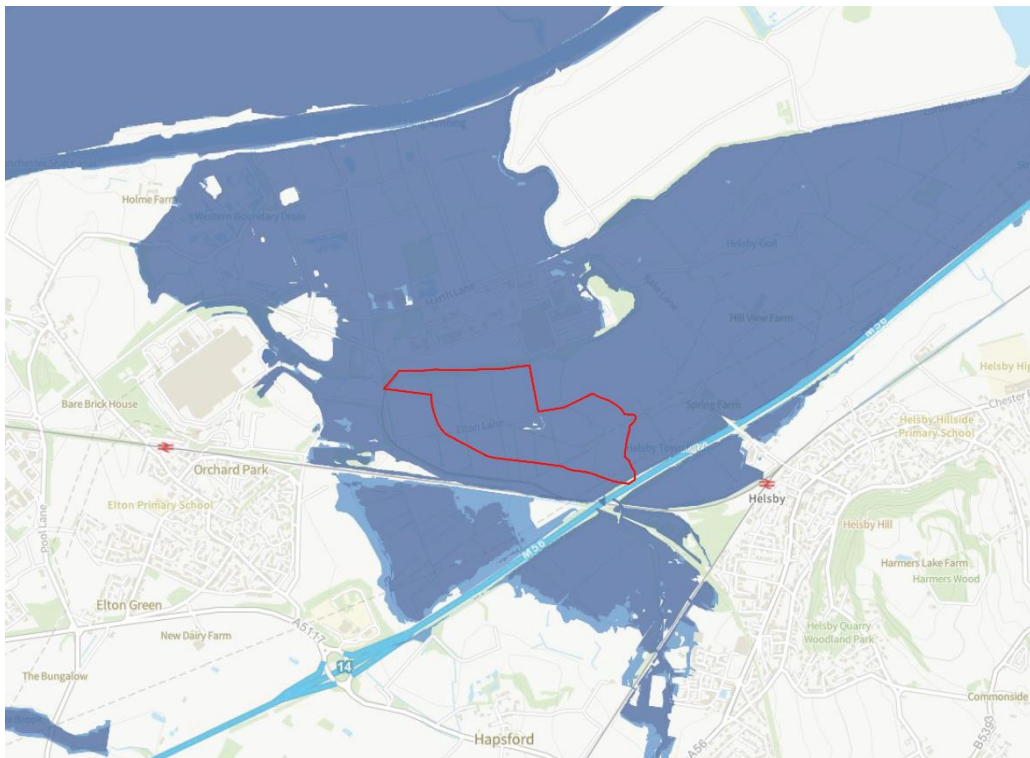


Figure 3.3: Extract from Environment Agency Zones 2 and 3 map

² <https://check-long-term-flood-risk.service.gov.uk/> accessed 11/08/25



Figure 3.4: Extract from Environment Agency 1 in 1000 year surface water flooding map.

3.7 As illustrated on **Figures 3.5 and 3.6** (below), the Site is almost entirely set within a Local Nature Reserve Site. Ecological advice should therefore be sought. There are no other designations on **Figure 3.5**, below: red triangles denote the boundary of Ince and Elton conservation areas, and green dashed linework denotes Local Wildlife Sites.



Figure 3.5: Extract from the Cheshire West and Chester Local Plan Map, confirming local designations.



Figure 3.6: Extract from MAGIC Map, confirming the designations within the local context (grade II listed building shown with red square, grade II* with blue square, orange hatch indicates Scheduled Monuments).

Table 3.2: NPPF Footnote 7 Area or Asset of Importance

Area or Asset of Importance	Comment
Habitats sites ³ (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest	The Site is a Local Nature Reserve Site. Technical advice from an ecology specialist would be required to ascertain whether this could constitute a strong reason for restricting or refusing development.
Local Green Space	The Site is not a designated Local Green Space. The Ince Neighbourhood Plan identifies a series of green spaces within Ince and the Site falls outside of these.
National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast	The Site is not within, or close to, any of these designations.

³ Habitat sites are defined in the glossary to the NPPF (December 2024) as 'Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.'

Irreplaceable habitats	We are not aware of the Site containing any 'irreplaceable habitats', although ecological advice should be sought to confirm this.
Designated heritage assets (and other heritage assets of archaeological interest)	<p>There are no designated heritage assets within or within the vicinity of the Site. The closest heritage assets are within Elton Village (c.950m to the south-west) and Helsby (c.900m to the south-east).</p> <p>We consider it unlikely that harm to these assets would provide a strong reason for refusing or restricting development. However further specialist heritage advice should be sought to confirm this.</p> <p>Archaeological advice should also be secured to confirm absence of any below ground assets.</p>
Areas at risk of flooding or coastal change	As described within paragraph 3.6 of this Appraisal, the Site is set within Flood Zone 3 and is at risk of flooding from rivers and sea. It is recommended that a Flood Risk Assessment is undertaken by a specialist consultant to determine whether flood risk would constitute a strong reason for refusing or restricting development within the Site.

- 3.8 Based on the above, we consider it unlikely that the Site would be considered as containing any areas or assets of particular importance identified in footnote 7 to the NPPF that would potentially provide a *strong* reason for refusing or restricting development on the Site. However, further technical assessment is required particularly in relation to ecology, built-heritage, archaeology and surface water flood risk.

Conclusion on the grey belt status of the Site

- 3.9 The Site does not perform strongly against Green Belt purposes a), b) or d) and it appears unlikely that any footnote 7 areas or assets of importance would provide a strong reason for refusing development on the Site. Resultantly, subject to the result of specialist advice on ecology, built heritage, archaeology and flood risk, there appears to be a strong case that the Site could be considered as grey belt land.

4. Part 2: Assessment of potential impact of development proposals on the strategic functioning of the Green Belt

- 4.1 For development on grey belt land to be regarded as not inappropriate in the Green Belt, a number of criteria need to be met (as set out in paragraphs 155 and 156 of the NPPF). These criteria are illustrated in **Figure 4.1**. This section considers the criterion relating to whether Development of the Site would fundamentally undermine the purposes of the remaining Green Belt. The other criteria fall outside the scope of this report.

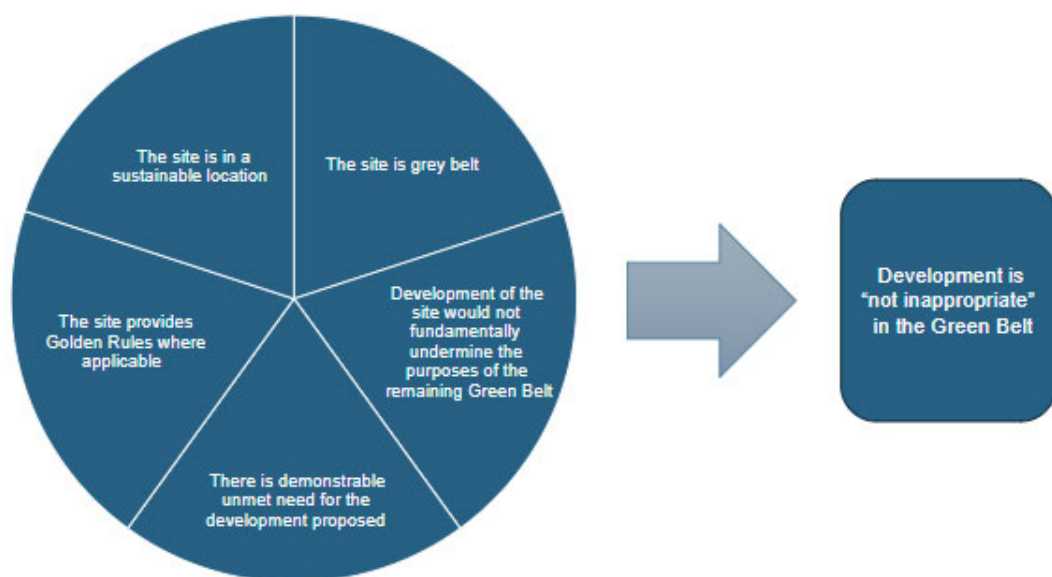


Figure 4.1: Extract from the Green Belt Guidance: ‘Figure 2. When is development in the Green Belt not inappropriate under paragraph 155 of the NPPF?’ Paragraph: 010. Reference ID: 64-010-20250225

- 4.2 Paragraph 155(a) requires proposals to demonstrate they ‘*would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*’. To come to a judgement on this, the PPG states that ‘*authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way*’.
- 4.3 The scale of the Site in the context of the Green Belt within the borough of Cheshire West is small, as demonstrated by the plan in **Figure 4.2**. Analysis on this stage of the assessment, against the five purposes of the Green Belt is provided in **Table 4.1** below.

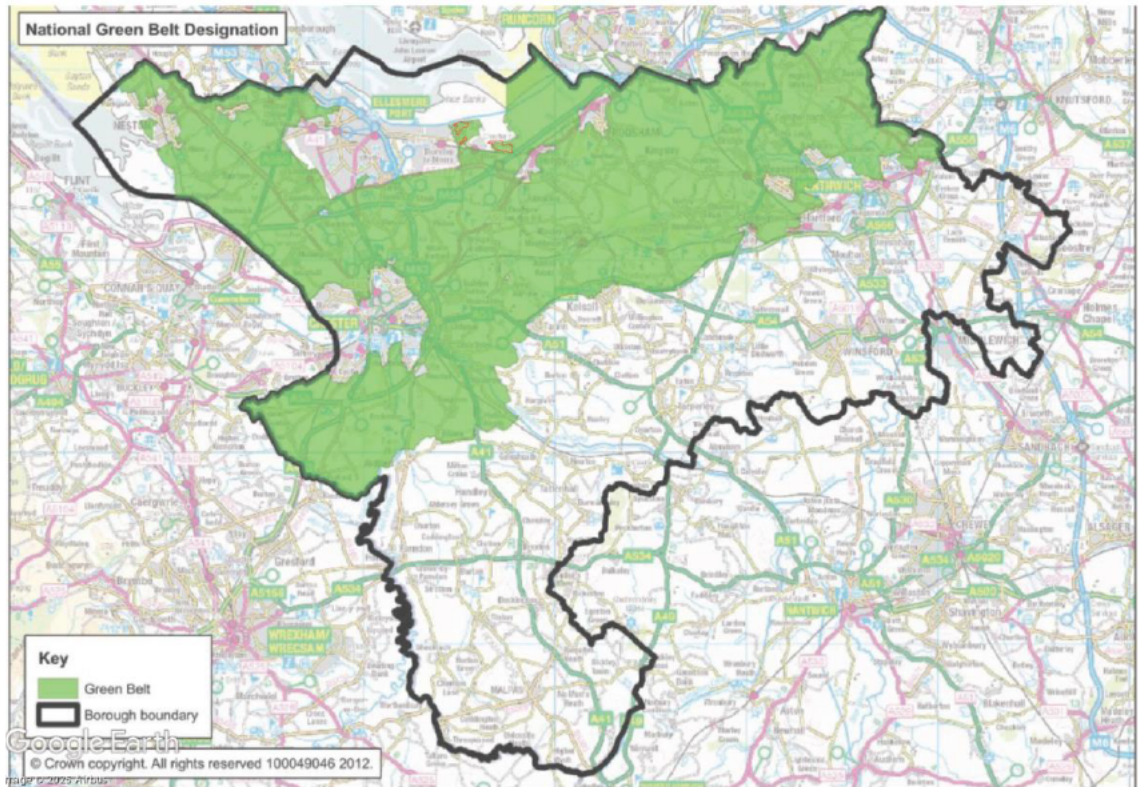


Figure 4.2: Extract from CWAC Green Belt Study (Part 1) illustrating the full extents of the borough green belt area. The Site is shown indicatively with red linework.

Table 4.1: Impact on the remaining Green Belt in the plan area

Green Belt Purpose	Commentary
Purpose a: To check the unrestricted sprawl of large built-up areas	The Site is c.1.5km to the east of the nearest large built-up area (Ellesmere Port/Stanlow) and falls within a broader piece of green belt land between the M56 motorway and the Manchester Ship Canal. There would therefore be limited change to the strategic functioning of the Green Belt in relation to this purpose and remaining Green Belt across the plan area would continue to serve this purpose in a meaningful way.
Purpose b: To prevent neighbouring towns merging into one another	Development within the Site would introduce areas of new development which are a notable distance away from the nearest towns (Ellesmere Port (c. 5.3km to the west), Chester (c.6.6km to the south-west) and Frodsham (c. 4.1km to the north-east). The remaining Green Belt within the plan area would therefore continue to serve purpose b) in a meaningful way.
Purpose c: To assist in safeguarding the countryside from encroachment	The introduction of development within the Site would introduce areas of new development on land which is currently open countryside. The Site forms a relatively expansive area of open countryside between the M56 motorway and railway to the south and the

	<p>Marsh Lane industrial estate to the north. It is also close to further industrial areas to the west and Elton (village) to the south-west. Development of the entire landscape would constitute a notable encroachment of the countryside with development narrowing the open landscape between Protos and Helsby.</p> <p>Taking into account all of the above, development of the Site would lead to notable encroachment within a localised part of the Green Belt across the plan area. There is a risk that this could be considered to undermine the strategic functioning of the Green Belt with regards to purpose c due to the fragmentation of parts of the Green Belt. However, when considered in the context of the Green Belt across the plan area as whole, there are extensive areas of landscape that are less influenced by existing development that would continue to serve purpose c in a meaningful way. It is advised that further consideration is given to the extent of the land parcels and associated mitigation measures to ensure the level of encroachment remains localised.</p>
Purpose d: Preserve the setting and special character of historic towns	The Site has no connection with the historic aspects of Ellesmere Port or Frodsham. Therefore, development of the Site would not affect the ability of all the remaining Green Belt from serving purpose d) in a meaningful way.
Purpose e: assist in urban regeneration, by encouraging the recycling of derelict and other urban land	All Green Belt within the plan area achieves purpose e) to the same extent. There would be no change to this as a result of development within the Site.

4.4 In conclusion, as described above, whilst a level of risk has been identified for the Site, overall it is considered that the localised nature of the Site in the context of the wider Green Belt would mean it could be demonstrated there that development would not *'affect the ability of the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'*.

4.5 This would be subject to further review of the extent of development within the land parcels and technical inputs in relation to footnote 7 to conclude whether the Site can meet the definition for grey belt land in the first instance.

Contact

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21 August 2025
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Appendix 1: Extract from Planning Practice Guidance (February 2025)

Green Belt

Advice on the role of the Green Belt in the planning system.

How should the contribution land makes to the relevant Green Belt purposes be assessed?

When making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d. Considerations for informing these judgements are set out below:

Purpose A – to check the unrestricted sprawl of large built-up areas

This purpose relates to the sprawl of large built-up areas. Villages should not be considered large built-up areas.

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: - be adjacent or near to a large built up area- if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built up area- are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns- the development of which would be likely to result in the loss of visual separation of towns
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - Forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Purpose D – to preserve the setting and special character of historic towns

This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and to include all of the following features: - form part of the setting of the historic town- make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - being separated to some extent from historic aspects of the town by existing

development or topography- containing existing development- not having an important visual, physical, or experiential relationship to historic aspects of the town

Weak or None

Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town- have no visual, physical, or experiential connection to the historic aspects of the town