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Our ref:
Your ref:

[Redacted]

Date: 29 September
2017

Dear Sir

Warrington - Local Plan Preferred Development Option

Thank you for consulting Historic England about the above document. This response details the expectation of the Preferred Development Options for Warrington and the intention for a proposed new Local Plan as indicated in the report (Para 2.33).

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

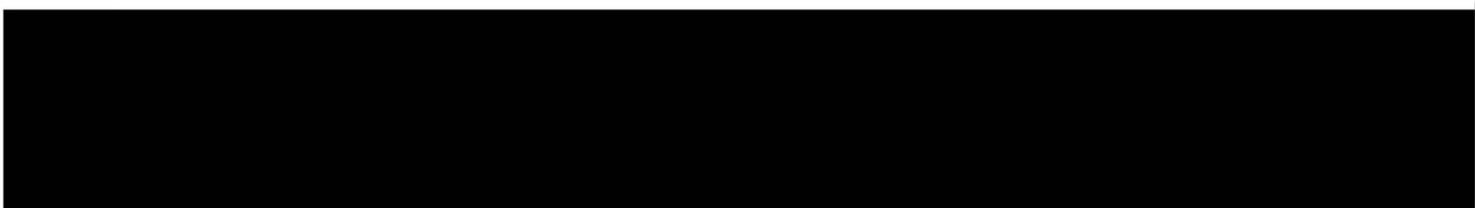
Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans [Redacted]

[Redacted] which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans

[Redacted]

[Redacted] may be useful in the production of your Plan.

The Local Plan for Warrington will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.



Evidence base

A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. The evidence base needs to identify:

- What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities;
- What issues and challenges it is facing and likely to be facing in the future;
- What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area.

When undertaking this exercise, it is important to bear in mind that it is not simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the Borough and its local distinctiveness and character which can easily be lost. There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being discovered in the future. It may also be necessary to identify heritage assets outside the Council's area where there are likely to be setting impacts caused by any development proposals put forward in the area. It is also important to bear in mind that some asset types are not currently well recorded. For example, the Register of Parks and Gardens of Historic Interest in England, is thought to represent only around two thirds of sites potentially deserving inclusion. Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a local list.

Potential sources of evidence include:

- National Heritage List for England
- Historic Environment Record
- Conservation Area Appraisals and Management Plans
- Local Lists
- National and Local Heritage At Risk Registers
- Historic Characterisation Assessments
- World Heritage Site Management Plans
- In house and local knowledge expertise

Where the evidence base is weak, the Council will need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan.

Spatial Portraits

The Local Plan should include a proper description and assessment of the historic environment in the Borough and the contribution it makes to the area (NPPF, Paragraph 169). The Plan needs to describe the historical growth of the area and identify its historic environment. It should also clearly identify the different places their character and identity and the contribution it makes to all aspects of life in Warrington.

Strategic Objectives

The report (page 18) sets out the new objectives for the Local Plan, which do not make reference to the historic environment. To contribute to ensuring that the Plan sets out a positive strategy for the conservation, enjoyment and enhancement of the historic environment as required in the NPPF, Objective W5 should be amended to make reference to it.

In view of this, Historic England is concerned, using the evidence provided that the assessment criteria which have been developed using the new strategic objectives, will not allow for any assessment of the historic environment for the options put forward within the report. As mentioned above, Objective W5 lacks any reference to the historic environment and Assessment Criteria W5 only refers to character implications. Therefore, in view of this we cannot see how the Plan will deal with the requirements of the NPPF and primary legislation on matters in relation to the historic environment.

Local Plan Policies

One of the twelve principal objectives of planning under the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations (NPPF, Paragraph 17). Conservation means maintaining what is important about a place and improving this where it is desirable. It is not a passive exercise. It requires a Plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness.

Strategic policies

Local Plans should include strategic policies to conserve and enhance the historic environment of the area and to guide how the presumption in favour of sustainable development should be applied locally. It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and any Neighbourhood Plans that come forward are required to be in general conformity with the strategic policies of the Local Plan.

The strategic policies for the historic environment will derive from the overall strategy to deliver conservation and enjoyment of the area's heritage assets for generations to come. These may be policies that concern themselves specifically with the development of types of heritage asset. But delivery of the NPPF objective may also require strategic policies on use, design of new development, transport layout and so on. Indeed every aspect of planning conceivably can make a contribution to conservation. Plan policies in all topics should be assessed for their impact on the strategic conservation objective.

Conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF objectives. The Local Plan should also consider the role which the historic environment can play in delivering other planning objectives:

- Building a strong, competitive economy
- Ensuring the vitality of town centres

- Supporting a prosperous rural economy
- Promoting sustainable transport
- Supporting high quality communication infrastructure
- Delivering a wide choice of high quality homes
- Requiring good design
- Protecting green belt land
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Facilitating the sustainable use of minerals

In formulating the strategy it is advisable and often necessary to consider the following factors:

- How the historic environment can assist in the delivery of the vision and the economic, social and environmental objectives for the plan area;
- How the Plan will address particular issues identified during the development of the evidence base including heritage at risk;
- The interrelationship between the conservation and enhancement of the historic environment and the other Plans policies and objectives;
- The means by which new development in conservation areas and within the setting of heritage assets might enhance or better reveal their significance;
- How local lists might assist in identifying and managing the conservation on non-designated heritage assets;
- How the archaeology of the Plan area might be managed;
- How CIL funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified;
- Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed;
- What implementation partners need to be identified in order to deliver the positive strategy;
- What indicators should be used to monitor the effectiveness of the strategy.

Development Management Policies

In terms of development management policies, it is clear that the NPPF expects plans to include detailed policies, which will enable a decision maker to determine a planning application.

The Local Plan for Warrington should include specific policies for the historic environment in order to help inform decisions that affect it and others should where possible cross-reference heritage related issues.

Key issues to be considered are (not wholly comprehensive):

- Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc).

- Designated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc).
- Archaeology including remains of less than national importance.
- Conservation areas
- Registered parks and gardens
- Heritage at Risk
- Important views and vistas
- Landscape character
- Local character and distinctiveness
- Individual settlements
- Historic shopfronts and advertisements
- Public realm
- Design
- Information to accompany an application.

Strategic Cross Boundary Issues

Strategic cross boundary issues that affect the historic environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues listed below, this is not an exclusive list and strategic issues will have to be considered on an area by area basis.

- extensive designated and non-designated heritage assets, e.g. World Heritage Sites, historic landscapes,
- major heritage based tourism attractions, the management of which may impact upon more than one Authority
- major quarries for building and roofing stone, e.g. Portland stone
- major changes to green belt which affect the preservation of the setting and character of historic towns
- major development proposals likely to affect important heritage assets in a neighbouring authority, e.g. major urban extensions, infrastructure proposals

These strategic issues will not necessarily and always be the same as the strategic policies for the protection and enhancement of the historic environment included in a Local Plan but are likely to be a sub-set of them. Indeed local circumstances may indicate that strategic approaches may not always be needed.

Site Allocations and the Preferred Development Option consultation

The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.

Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate:

1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution.
2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets.
3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level.
4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset?

The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.

The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.

Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.

The Preferred Development Option Regulation 18 consultation (July 2017) defines the development needs of the area and puts forward sites which the Council is putting forward as their preferred areas for growth and development. In identifying these sites, it is expected that the Council will have undertaken a robust assessment to understand the impact of these sites/areas of growth will have on the historic environment. There is no evidence that this has been undertaken.

Stage 3 of the process (Page 20 of the report) outlines the process that the Council took to assess the spatial options to understand where this can take place. In order to inform the

options appraisal process, the Council has prepared Area Profiles for the individual parts of the main urban areas and for each of the outlying settlements. These documents do not contain an assessment of the historic environment. The tables refer to the number of assets that are within or adjacent to the site but there is no assessment of these assets. Whilst this can be a useful starting point in the process in helping to identify assets, there does need to be an assessment undertaken of the impact that the sites may have on the historic environment and heritage assets including their setting.

Stage 4 of the process assesses options for the main development locations. For example the SWUE assessment proformas including the Areas Profiles and Technical Paper do not contain any assessment of the impact that the sites will have on the historic environment. It mentions some types of assets but does not undertake any assessment. The other comments in this letter should also be read in conjunction with this.

The summary of the High Level Spatial Options Assessment determines that Option 2; A Garden City Suburb of approximately 6000 homes and an urban extension to the south west of Warrington of up to 2000 homes performed best when assessed against the strategic plan objectives, taking into account the results of the SA/SEA. However, we cannot find any evidence to demonstrate that there has been an assessment of the impact on the historic environment.

These comments should also be applied to the Employment Land locations included within Section 4 of the report.

These comments should also be applied to the sites being allocated for Gypsies, Travellers and Travelling Show-people (Table 10 of the report).

In terms of minerals and waste the content of this letter also applies. In addition, there will be a number of key issues which the Plan will need to address:

Minerals

- The Plan will need to demonstrate how it will deliver a steady supply of minerals whilst still safeguarding those elements that contribute to the significance of the heritage assets of the area.
- The Plan will need to show how the scale of future mineral provision is based upon a robust assessment of the likely impacts which the level of extraction proposed might have upon the environment. In this respect, it needs to examine to what extent the assessed demand for the area's mineral resources are capable of being met whilst still safeguarding its historic assets.
- The Plan needs to ensure that the strategy for minerals development and in particular, the location identified for future extraction are delivered in a manner which safeguards those elements which contribute to the significance of the heritage assets of the Warrington area.
- The Plan needs to demonstrate how it will ensure that the after use strategy for minerals sites safeguards the historic environment. This will require a strategic approach to restoration which sets out an effective and co-ordinated after use strategy.

Waste

- The Plan needs to ensure that the strategy for waste management and in particular, the locations identified for future waste developments are delivered in a manner which safeguards those elements which contribute to the significance of the heritage assets in Warrington.
- The Plan needs to show how encouraging the reuse or adaptation of existing buildings might assist in reducing the amounts of construction and demolition of waste. This can include exploring how it can include appropriate policies to encourage the reuse of existing buildings (rather than simply allowing them to be demolished and the site redeveloped).
- Consideration should also be given to the encouragement of the development of appropriate facilities for the re-use of demolition waste particularly where these might help facilitate the repair of the area's historic buildings.

The Report (Chapter 5) summarises the Council's overall approach to the Preferred Development Option for Warrington New City and the evidence base contains studies and master-planning which the Council states confirms that they are able to accommodate the level of growth required and to provide additional detail relating to infrastructure requirements, constraints and important development principles. We can find no evidence that any assessment has been undertaken for any of the sites to inform their suitability for development of the historic environment. For example, the document for the SWUE titled SWUE Framework Plan Final June has one page which maps out the historic assets in relation to the proposed site but there is no evidence to inform the conceptual site layout shown.

As outlined in this letter, the Plan needs to demonstrate how the sites can be developed without harm to the historic environment, heritage assets and their setting. We would expect a robust assessment to be undertaken for each of the sites. Other sites may provide opportunities of the historic environment, for example the WWDA includes a Grade II* heritage asset (Transporter Bridge) which is currently on the Heritage at Risk Register. The Plan would provide an opportunity to tackle this asset and remove it from the Register. Similar opportunities also exist for the conservation areas within the town centre which are currently on the Conservation Areas at Risk Register.

Historic England strongly advises that you engage conservation, archaeology and urban design colleagues to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the Local Plan, the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER (formerly SMR). They will be able to provide you with the Historic Environment Records for the area including any relevant studies, and ensure a joined-up and robust approach is undertaken.

Finally, we should like to stress that this opinion is based on the information provided by you with your email of 18th July 2017. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, this would have an adverse effect upon the historic environment.

Historic England would welcome the opportunity to work with you on the Plan for Warrington and look forward to hearing from you.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

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[Redacted contact information]

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