



Historic England

Our ref: PL00574795/792

Email: localplan@warrington.gov.uk

Date: 14 June 2019

Dear Sir/Madam

**Public consultation – Warrington Proposed Submission Version Local Plan/SEA**

Thank you for consulting Historic England on the above.

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 Digital 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 raised several issues in relation to the Plan for Warrington (see attached table).

SEA

In view of our comments on the Plan, Historic England would consider that as drafted, they do not represent having a positive effect on SA Theme: *built and natural heritage*. However, the suggested changes would help achieve this.

If you have any queries about the content of this letter, please do not hesitate to contact me. Historic England would be happy to work with the authority to resolve the matters raised in the local plan consultation.

Yours sincerely



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Correspondence or information which you send us may therefore become publicly available.



## Historic England Response to the Warrington Proposed Submission Version Local Plan (June 2019)

Page	Section	Sound/Unsound	Comments	Suggested Change
-	Evidence base	Unsound	<p>A requirement in the NPPF is that Local Plans need to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area which would include the historic environment on the historic environment.</p> <p>An up-to-date local plan should be based on a sound evidence base which will contain enough detail to allow the significance of heritage assets to be assessed and to secure a commitment to high quality design.</p> <p>It does not appear that the evidence base includes all information relevant to the historic environment and should be amended</p>	That the evidence base is amended to ensure that all the information that is relevant to the historic environment in Warrington is included.
5-14	2.1 Spatial Portrait	Unsound	<p>Subject to the suggested amendment, we would support the Spatial Portrait for Warrington.</p> <p>We welcome the description of the town of Warrington and how it has evolved over the years.</p> <p>In relation to Para 2.1.42 to 2.1.59, the heading is incorrectly titled 'Warrington's built and natural environment'. The content of this section focuses on the historic and natural environment, and given the historic environment is not just a "built asset" this</p>	<p>The title of Para 2.1.42 should be amended to read:</p> <p><i>"Warrington's Historic and Natural Environment"</i></p> <p>An additional paragraph should be included which summarises the character of Warrington as a place.</p>

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Page	Section	Sound/Unsound	Comments	Suggested Change
			should be amended. This would also provide consistency with Para 6 of the Vision. In addition, the Plan mentions the importance of character (See Vision objectives and opportunities) this section would benefit from identifying what this is.	
15	Para 2.2.4	Unsound – subject to minor change	<p>Subject to the suggested amendment, we support the opportunities for Warrington.</p> <p>The Local Plan for Warrington represents a fantastic opportunity to sustain, conserve and enhance its built environment, historic environment and local character and distinctiveness. To ensure consistency with the Plan as a whole (in areas such as the vision, objectives and policies), an additional bullet should be introduced here.</p>	<p>An additional bullet should be introduced to read:</p> <p><i>An improved historic and built environment, that sustains local character and distinctiveness, conserves and enhances its important assets and recognises the opportunities it can bring to town.</i></p>
17	Vision – Warrington 2037	Sound	<p>We support the Vision for Warrington, especially that by 2037, Warrington will be:</p> <p>A place to be proud of</p> <p>Attractive, well-designed, sustainable and healthy communities</p> <p>The character of Warrington’s places will be maintained and enhanced with a vibrant town centre and main urban area</p> <p>Unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed.</p> <p>The enhancement of the town centre’s cultural offer</p>	-
20	Objectives	Sound	We welcome the content of this objective	-

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	W5		which seeks to secure high quality design which reinforces the character and local distinctiveness of Warrington as well as protecting, enhancing and embracing its historic, cultural, built and natural assets.	
68	Policy TC 1 Bullet 9a	Unsound	<p>Historic England welcomes the content of this policy including improving the role of the town centre and its environment and enhancing its cultural activities.</p> <p>However, Bullet 9a needs to be amended in line with the terminology of the NPPF. The use of 'heritage values' should read historic environment in line with the NPPF definition contained in the Glossary.</p> <p>Subject to this amendment, Historic England would support this policy.</p>	<p>Bullet 9a should be amended to read:</p> <p><i>'ensure the historic environment and heritage assets are sustained, conserved and enhanced'</i>.</p>
87	Policy INF3 Utilities and Telecommunications	Unsound	<p>Proposals for telecommunications have the potential to harm heritage assets and their settings. Whilst we welcome the intention to ensure that there is no impact on heritage assets, the proposed wording suggests that it is only 'significant detrimental' impacts. The NPPF talks about harm and this could be substantial or less than substantial harm. It is unclear what a significant detrimental impact is and how would the policy deal with a proposal which is not significant. In view of this, the policy would not provide a framework that would safeguard the Borough's heritage assets or provide clear guidance on what would be accepted for those submitting planning</p>	<p>Bullet 9d should be amended to read:</p> <p><i>'There is no unacceptable harm to residential amenity, the character and appearance of the area, the street scene, a heritage asset, pedestrian movement or the satisfactory functioning of the highway'</i></p>

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			applications. In view of this the policy should be amended to refer to 'harm' in line with the NPPF.	
93	Policy INF5 Delivering Infrastructure	Sound – subject to minor amendments	<p>Whilst we welcome inclusion of heritage assets in the list of matters to be dealt with by planning obligations, it would be better to include reference to the historic environment with specific mention of heritage at risk. It is also not just about improvements but for example about safeguarding and enhancing.</p> <p>Subject to this minor amendment, Historic England would support this policy.</p>	<p>Bullet 5 of the policy should be amended to read:</p> <p><i>Historic environment including heritage at risk</i></p>
98	Policy DC1 Warrington's Places	Unsound	<p>Warrington's historic environment is varied and includes both designated and non-designated heritage as well as its local character and distinctiveness. The policy as drafted only includes reference to this within certain places in the policy and not others, which suggests that it is not relevant or does not exist in some of them.</p> <p>In addition, Para 16 makes reference to the need for all proposals in the Walton Hall Estate to have regard to national and local policies relating to the historic environment, yet this does not apply to anywhere else in the places policy.</p> <p>The policy would be enhanced if it made sure that the historic environment, was treated equally in the other areas of the borough rather than selectively.</p>	<p>This policy should be amended to enhance the approach to the historic environment and to ensure that it is conserved and enhanced in all places in Warrington and not just selective areas.</p>

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100	Policy DC1 Warrington's Places  Bullet 15d	Unsound	Whilst we welcome the intention to ensure that proposals are not detrimental to the historic environment, the proposed wording suggests that it is only 'detrimental' that needs to be taken into account. The NPPF talks about harm and this could be substantial or less than substantial harm. It is unclear what detrimental to is and how the policy intends to safeguard the various heritage assets. The policy should also ensure that opportunities to enhance the estate and its heritage assets are included.	Bullet 15d should be amended to read:  <i>"Conserve and enhance the historic environment"</i>
104	Policy DC2 Historic Environment	Sound	We welcome the inclusion of a policy for the historic environment in the Warrington Local Plan. The policy sets out its strategy based on elements which contribute to Warrington's distinct identity and sense of place.  We welcome the inclusion of the list within Para 2 of the policy and also the list of actions contained in Para 3 of the policy.  In addition, we consider that Para 4 to 8 will provide an appropriate framework on which to guide the assessment of applications that affect Warrington's historic environment.	-
125	Policy DC6 Quality of Place	Unsound	We welcome the inclusion of this policy which promotes the principal of good design in Warrington. The need for development to make a positive contribution to local character and distinctiveness is outlined in the NPPF. Therefore, the policy should include this within bullet point 1a, as the	Bullet 1a should be amended to read:  <i>'Respect, sustain and make a positive contribution to local character and distinctiveness within the surrounding area, and where appropriate.....'</i>

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			<p>need to respect local character only would not provide the most appropriate framework for the Borough nor be in accordance with the NPPF.</p> <p>So in view of this, the policy should be amended.</p> <p>Subject to this minor amendment, Historic England would support this policy.</p>	
167	Policy MD1	Unsound	<p>Warrington Borough Council has produced a number of heritage impact assessments to accompany their site allocations.</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development proposals. 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.</p> <p>Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment.</p>	<p>The plan needs to be amended in the following ways:</p> <p>Para 57 amended to read:</p> <p><i>Development will be required to preserve and enhance the historic environment, heritage assets and their setting.</i></p> <p>Para 58 amended to read:</p> <p><i>Development proposals will be required to be in accordance with the Waterfront Heritage Impact Assessment including the proposed mitigation and enhancement measures.</i></p> <p>Bullet a and b: It is recommended that these bullets be deleted to ensure that it is consistent with the NPPF and the content of the HIA. At the moment it appears to not match its recommendations or include all of the heritage assets.</p> <p>Para 59 should be amended to read:</p>

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			<p>However, there needs to be amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk.</p> <p>This will ensure that the HIA and the mitigation measures are properly embedded in the policy and will therefore ensure the conservation and enhancement of Warrington's historic environment in future development proposals.</p>	<p>Development proposals will need to demonstrate how it will safeguard and sustain the future of the Bank Quay Transporter Bridge (Grade II*) which is currently on the Heritage at Risk Register. A planning contribution will be expected from both the residential and employment development towards securing the future of this heritage asset.</p>
181	MD2 – Warrington Garden Suburb	Unsound	<p>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.</p> <p>Site MD2 Warrington Garden Suburb</p>	<p>The plan policy needs to be amended in the following way:</p> <p>Para 67 amended to read:</p> <p><i>Development will be required to preserve and enhance the historic environment, heritage assets and their setting.</i></p> <p>Para 68 amended to read:</p> <p><i>Development proposals will be required to be in accordance with the Garden Suburb Heritage Impact Assessment including the proposed mitigation and enhancement measures.</i></p> <p>Paragraph 69 to be deleted.</p> <p>The heritage impact assessment should be amended to include the following mitigation</p>



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			<p>has the potential to harm the historic environment including a number of highly graded heritage assets. Therefore it is important that the Plan and its evidence base sets out a framework to appropriately manage the development proposals including setting out in its heritage impact assessment specific mitigation measures to guide future development proposals.</p> <p>A development framework has been produced for the site to inform the local plan, however Historic England understands that this will be replaced. In order to demonstrate that the site can be developed without harm to the historic environment, specific mitigation measures need to be included in the heritage impact assessment and then tied into the policy. This can be through specific reference within the policy or reference to the content of the (amended) heritage impact assessment. This will ensure that any future SPD (or revised development framework) carries these specific mitigation measures forward.</p> <p>In view of the above, Historic England considers that the proposed design measures do not go far enough to mitigate the harm.</p>	<p>measures:</p> <p><b>Country Park</b> We welcome the inclusion of the country park to the south of Grappenhall Conservation Area. It would be helpful if the details of this proposal in terms of its specific location, boundaries etc. and any landscaping proposals are within the HIA. This will help sustain the open setting of the conservation area to the south. Therefore, it is expected that the country park and specific details should be included as a specific mitigation measures.</p> <p><b>Plot B5</b> This plot is open land which currently makes a positive contribution to the setting of the Grappenhall Conservation Area and the various heritage assets. It will be important to ensure that harm any harm is minimised and therefore, the location of the open space and any proposed landscaping areas including tree belts needs to be clearly identified. There is also a need to state the need for the retention of the cricket ground as this makes an important contribution to the setting of the conservation area.</p> <p><b>Plot A6</b> This plot includes a scheduled monument (Roman road). There should be a requirement that Cheshire Archaeology Service is consulted to ensure that the potential for archaeology is fully understood and that any conditions in terms of assessments or trial trenches etc. that they</p>

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			<p>Therefore, in terms of the mitigation measures that are required for this site, reference will be made to this existing evidence base document – Garden Suburb Development Framework (March 2019), in particular Figure 5.7. The proposed mitigation measures should be set out within this Local Plan and its evidence base and carried through to any future development framework that is produced. Without this amendment, Historic England considers that the site cannot be developed without harm to the historic environment and strongly objects to its inclusion.</p> <p>Comments on the layout of the site:</p> <p><i>Country Park</i> We welcome the inclusion of the country park to the south of Grappenhall Conservation Area. It would be helpful if the details of this proposal in terms of its specific location, boundaries etc. and any landscaping proposals are within the HIA. This will help sustain the open setting of the conservation area to the south. Therefore, it is expected that the country park and specific details should be included as a specific mitigation measures.</p> <p><i>Plot B5</i> This plot is open land which currently</p>	<p>recommend are included with the HIA and reinforced in the site policy.</p> <p><i>Plot E4</i> This plot is adjacent to a Grade II* heritage asset. We would expect that the plot boundary is pulled away from the barn to maintain its rural setting. This includes the area to the north and to the south west. There is also a need to specify the location and type of planting proposed that will contribute to maintaining this setting. Any screening should be enhanced through a landscaping scheme.</p> <p><i>Plot E1 and E2</i> These plots are adjacent to the scheduled monument. There is currently a planning application for these two plots. Therefore, the comments here take this into account and any expectations for the site. We would expect that the mitigation measures are still included within the HIA, as this provides some certainty should any alternative proposals be put forward in the future:</p> <ul style="list-style-type: none"> <li>• The existing landscaping on the boundaries of the plots and the scheduled monument should be retained. Opportunities to strengthen this through additional planting should be part of any planning proposals.</li> <li>• The wildlife area to the extreme south of the site should be retained as it provides a buffer between the new warehouses and the Grade II* barn.</li> </ul>

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			<p>makes a positive contribution to the setting of the Grappenhall Conservation Area and the various heritage assets. It will be important to ensure that harm any harm is minimised and therefore, the location of the open space and any proposed landscaping areas including tree belts needs to be clearly identified. There is also a need to state the need for the retention of the cricket ground as this makes an important contribution to the setting of the conservation area.</p> <p><i>Plot A6</i> This plot includes a scheduled monument (Roman road). There should be a requirement that Cheshire Archaeology Service is consulted to ensure that the potential for archaeology is fully understood and that any conditions in terms of assessments or trial trenches etc. that they recommend are included with the HIA and reinforced in the site policy.</p> <p><i>Plot E4</i> This plot is adjacent to a Grade II* heritage asset. We would expect that the plot boundary is pulled away from the barn to maintain its rural setting. This includes the area to the north and to the south west. There is also a need to specify the location and type of planting proposed that will contribute to</p>	<ul style="list-style-type: none"> <li>• A view corridor to the south of the scheduled monument (running n/s) should be retained and not be developed. Taken into account with the comments on Plot E4, this would allow the retention of a rural setting for these two assets and also maintain a visual link. This should be included as a green corridor like that proposed to the south of Grappenhall. From a wider perspective, this green corridor could link in with the other ones and the neighborhood heart.</li> <li>• In addition, a view corridor should be retained to the north east of the scheduled monument to ensure an additional visual link.</li> </ul>

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			<p>maintaining this setting. Any screening should be enhanced through a landscaping scheme.</p> <p><i>Plot E1 and E2</i>                      These plots are adjacent to the scheduled monument. There is currently a planning application for these two plots. Therefore, the comments here take this into account and any expectations for the site. We would expect that the mitigation measures are still included within the HIA, as this provides some certainty should any alternative proposals be put forward in the future:</p> <ul style="list-style-type: none"> <li>• The existing landscaping on the boundaries of the plots and the scheduled monument should be retained. Opportunities to strengthen this through additional planting should be part of any planning proposals.</li> <li>• The wildlife area to the extreme south of the site should be retained as it provides a buffer between the new warehouses and the Grade II* barn.</li> <li>• A view corridor to the south of the scheduled monument (running n/s) should be retained and not be developed. Taken into account with the comments on Plot E4, this</li> </ul>	

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			<p>would allow the retention of a rural setting for these two assets and also maintain a visual link. This should be included as a green corridor like that proposed to the south of Grappenhall. From a wider perspective, this green corridor could link in with the other ones and the neighborhood heart.</p> <ul style="list-style-type: none"> <li>• In addition, a view corridor should be retained to the north east of the scheduled monument to ensure an additional visual link.</li> </ul> <p>There also needs to be amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA, we have suggested text changes to Para 67-69 which are included in our 'suggested change' column:</p> <p>Para 67: This needs to be simplified and strengthened to be in line with the requirements of the NPPF. It should be noted that there is more than 1 Scheduled monument on the site.</p> <p>Para 68: We have suggested a change which ties in the requirements of the HIA (see additional mitigation measures that need to be included); rather than reference to selective heritage assets, this will ensure that all are included.</p>	

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			<p>Para 69: We have suggested a change which ties in the requirements of the HIA (see additional mitigation measures that need to be included); rather than reference to selective heritage assets, this will ensure that all are included.</p> <p>These changes will ensure that the HIA is properly embedded in the policy and with conserve and enhance Warrington's historic environment and heritage assets in future development proposals, and any new development framework/SPD that may be produced.</p> <p>Without this, Historic England considers that the Council is unable to demonstrate through its evidence base (Heritage Impact Assessments) and the site allocation policy that the principle of development is acceptable in terms of its impact on the historic environment.</p>	
192	MD3 South West Urban Extension	Unsound	<p>Warrington Borough Council has produced a number of heritage impact assessments to accompany their site allocations.</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development proposals. 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</p>	<p>The plan needs to be amended in the following ways:</p> <p>Para 45 amended to read:</p> <p><i>Development will be required to preserve and enhance the historic environment, heritage assets and their setting.</i></p> <p>Para 46 amended to read:</p>

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			<p>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.</p> <p>Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment.</p> <p>However, there needs to be amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk.</p> <p>This will ensure that the HIA and the mitigation measures are properly embedded in the policy and will therefore ensure the conservation and enhancement of Warrington's historic environment in future development proposals.</p> <p>Subject to suggested textual amendments, Historic England would support this proposed allocation/policy.</p>	<p><i>Development proposals will be required to be in accordance with the South Western Urban Extension Heritage Impact Assessment including the proposed mitigation and enhancement measures.</i></p> <p>Bullet a and b: It is recommended that these bullets be deleted to ensure that it is consistent with the NPPF and the content of the HIA. At the moment it appears to not match its recommendations or include all the heritage assets.</p> <p>Paragraph 47 and 48: Recommendations do not appear to match that included in the HIA so this should be amended. Given the policy makes reference to the need to consider the requirements of the HIA there is no need to reference the detail (which is not always consistent).</p>
208	Policy OS1 – Burtonwood	Unsound	Warrington Borough Council has produced a number of heritage impact assessments to accompany their site allocations.	<p>The plan needs to be amended in the following ways:</p> <p>Para 19 amended to read:</p>

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			<p>The NPPF makes it clear that the significance of heritage assets can be harmed through development proposals. 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.</p> <p>Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment.</p> <p>However, there needs to be amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk.</p> <p>This will ensure that the HIA and the mitigation measures are properly embedded in the policy and will therefore ensure the conservation and enhancement of Warrington's historic environment in future development proposals.</p>	<p><i>Development will be required to preserve and enhance the historic environment, heritage assets and their setting.</i></p> <p>Para 20 amended to read:</p> <p><i>Development proposals will be required to be in accordance with the Burtonwood Heritage Impact Assessment including the proposed mitigation and enhancement measures.</i></p> <p>Bullet a: It is recommended that these bullets be deleted to ensure that it is consistent with the NPPF and the content of the HIA. The suggested change to Para 20 would mean there is no need to include additional detail.</p>
228	Policy OS6 –	Unsound	Warrington Borough Council has produced	



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	Lymm (Pool Lane)		<p>a number of heritage impact assessments to accompany their site allocations.</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development proposals. 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.</p> <p>Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment.</p> <p>However, there needs to be amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk.</p> <p>This will ensure that the HIA and the mitigation measures are properly embedded in the policy and will therefore</p>	<p>The plan needs to be amended in the following ways:</p> <p>Para 20 amended to read:</p> <p><i>Development will be required to preserve and enhance the historic environment, heritage assets and their setting.</i></p> <p>Para 21 amended to read:</p> <p><i>Development proposals will be required to be in accordance with the Heritage Impact Assessment for Lymm – Pool Lane including the proposed mitigation and enhancement measures.</i></p> <p>Bullet a: It is recommended that this bullet be deleted to ensure that it is consistent with the NPPF and the content of the HIA. The suggested change to Para 21 would mean there is no need to include additional detail.</p>

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			ensure the conservation and enhancement of Warrington's historic environment in future development proposals.	
233	OS7 – Lymm (Rushgreen Road/Tanyard Farm)	Unsound	<p>Warrington Borough Council has produced a number of heritage impact assessments to accompany their site allocations.</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development proposals. 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.</p> <p>Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment.</p> <p>However, there needs to be amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk.</p>	<p>The plan needs to be amended in the following ways:</p> <p>Para 19 amended to read:</p> <p><i>Development will be required to preserve and enhance the historic environment, heritage assets and their setting.</i></p> <p>Para 20 amended to read:</p> <p><i>Development proposals will be required to be in accordance with the Heritage Impact Assessment for Lymm – Tanyard Farm including the proposed mitigation and enhancement measures.</i></p> <p>Bullet a: It is recommended that this bullet be deleted to ensure that it is consistent with the NPPF and the content of the HIA. The suggested change to Para 20 would mean there is no need to include additional detail.</p>

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			This will ensure that the HIA and the mitigation measures are properly embedded in the policy and will therefore ensure the conservation and enhancement of Warrington's historic environment in future development proposals.	
237	Policy OS8 – Lymm (Warrington Road)	Unsound	<p>Warrington Borough Council has produced a number of heritage impact assessments to accompany their site allocations.</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development proposals. 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.</p> <p>Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment.</p> <p>However, there needs to be amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application</p>	<p>The plan needs to be amended in the following ways:</p> <p>Para 20 amended to read:</p> <p><i>Development will be required to preserve and enhance the historic environment, heritage assets and their setting.</i></p> <p>Para 20 amended to read:</p> <p><i>Development proposals will be required to be in accordance with the Heritage Impact Assessment for Lymm – (Warrington Road) including the proposed mitigation and enhancement measures.</i></p> <p>Bullet a: It is recommended that this bullet be deleted to ensure that it is consistent with the NPPF and the content of the HIA. The suggested change to Para 20 would mean there is no need to include additional detail.</p>

## Historic England Response to the Warrington Proposed Submission Version Local Plan (June 2019)

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			<p>of the HIA and to appropriately deal with the heritage asset at risk.</p> <p>This will ensure that the HIA and the mitigation measures are properly embedded in the policy and will therefore ensure the conservation and enhancement of Warrington's historic environment in future development proposals.</p>	
242	Policy OS9 – Land to the north of Winwick	Unsound	<p>Warrington Borough Council has produced a number of heritage impact assessments to accompany their site allocations.</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development proposals. 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.</p> <p>Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment.</p> <p>However, there needs to be amendments to</p>	<p>The plan needs to be amended in the following ways:</p> <p>Para 17 amended to read:</p> <p><i>Development will be required to preserve and enhance the historic environment, heritage assets and their setting.</i></p> <p>Para 18 amended to read:</p> <p><i>Development proposals will be required to be in accordance with the Winwick Heritage Impact Assessment for including the proposed mitigation and enhancement measures.</i></p> <p>Bullet a: It is recommended that this bullet be deleted to ensure that it is consistent with the content of the HIA. The suggested change to Para 20 would mean there is no need to include this additional detail. This should be replaced with a new bulleted paragraph:</p> <p>Para 19:</p>

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			<p>the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk.</p> <p>This will ensure that the HIA and the mitigation measures are properly embedded in the policy and will therefore ensure the conservation and enhancement of Warrington's historic environment in future development proposals.</p>	<p>Development proposals will be expected to conserve and enhance the historic significance, appearance and integrity of and the ability to understand and appreciate the setting of the Battle of Winwick.</p> <p>This needs to be reflected in the Heritage Impact Assessment.</p>