

OMEGA ZONE 8**Application No, P/2020/0061/HYBR****Response to Historic England letter (ref: P01166371) dated 24th February 2020**

Historic England comment	WSP response
<p>Historic England considers that that application as submitted contains insufficient information to allow the impact of the Proposed Development upon the settings of key designated heritage assets to be properly assessed, or the suitability of the measures proposed to mitigate that impact to be confirmed. We consider that Chapter 8 of the Environmental Statement (ES) needs to be revised to include consideration of the impact of the Proposed Development on the setting of Old Moat House medieval moat, Bold (SM1017582), and that the photographic supporting information for the Landscape and Visual Impact assessment also needs revision so that the scale and siting of the elements of the Proposed Development can be properly appreciated.</p>	<p>Please refer to responses below.</p>
<p>The site of the Proposed Development contains no designated heritage assets, although Chapter 8 of the Environmental Statement ('Cultural Heritage') identifies a number of undesignated heritage assets which would potentially be directly affected by the development. We recommend that the guidance of the Merseyside Environmental Advisory Service be sought on the requirement for further archaeological work within the site of the Proposed Development, and its phasing, and the suitability of the measures proposed for the mitigation of the impacts on undesignated heritage assets.</p>	<p>MEAS was consulted during the production of the Historic Environment Desk-Based Assessment (HEDBA). The HEDBA was submitted in support of the planning application (OPP DOC.11.21). Further to the production of the HEDBA, a Level 2 Archaeological Landscape Survey was agreed with MEAS as an additional phase of works. Following consultation on the results of this survey, MEAS confirmed on 9 March 2020 that <i>"the work done to date has sufficiently established the archaeological potential of the site and as such further mitigation is not warranted"</i>.</p>
<p>Historic England has some concerns about the way in which potential impacts on the settings of designated heritage assets, and particularly of scheduled monuments, have been assessed within the ES. Chapter 8 identifies a number of scheduled monuments within the agreed 2km buffer study area whose settings might potentially be impacted by the Proposed Development These are Old Bold Hall moated site, Bold (SM1010703), Barrow Old Hall moated site, Great Sankey (SM1013363), Old Moat House medieval site, Bold (SM1017582), Site of Heavy Anti-Aircraft Gun, South Lane Farm (SM1019531) and Pickett-Hamilton fort,</p>	<p>The definition of setting used in the HEDBA is taken from the NPPF and is defined as <i>'the surroundings in which an asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'</i>.</p> <p>The setting and significance of the two remaining Scheduled Monuments (SM1010703 and SM1017582), and any impacts to them from the Proposed Development, are discussed within the HEDBA.</p>

<p>south-east of Limekiln Farm (SM1020869). SM1013363, SM1019531 and SM1020869 have subsequently been scoped out of the assessment, either because they are said to be screened from the Proposed Development site, or because their settings are already degraded.</p> <p>Of the two remaining Scheduled Monuments, an assessment is provided in Chapter 8 of the potential impact upon the setting of SM1010703 of both the construction and operational phases of the proposed development, but there is no further mention within this chapter of SM1017582.</p>	<p>Old Bold Hall moated site (SM1010703) is assessed further within Chapter 8 of the ES, as the HEBDA considered there to be potential for significant effects to occur on the setting of this asset.</p> <p>Old Moat House medieval site, Bold (SM1017582) is <u>not</u> assessed further within Chapter 8 of the ES, as the HEBDA considered the potential for significant effects to occur on the setting and significance of this asset to be unlikely, with only minor impacts predicted, as outlined below.</p> <p>SM1017582 once lay within a landscape of small irregular shaped fields, suggestive of an old enclosure, much of which has now disappeared, as has a large area of ancient woodland (Hollin Wood; see HEDBA Figure 4-4). Furthermore, recent development, principally the construction of the M62, has cut off the asset from the former enclosed field landscape that it shared with Old Bold Hall moated site, Bold (SM1010703) to the south-west. Also, the development associated with Moat House farm to the south has further removed its rural setting. Although the asset is surrounded by tree cover, it retains some aspect of a quiet rural setting, although modern infrastructure has intruded on this. The Proposed Development will be visible from the asset, but given its distance (the asset is located 1.3km to the north) it is suggested that the contribution of the setting of the cultural heritage asset to its significance will be slightly degraded as a result of the Proposed Development, but without adversely affecting the interpretability of the asset and its setting: characteristics of historic value can still be appreciated, the changes do not strongly conflict with the character of the site, and could be easily reversed to approximate the pre-development conditions. Therefore, there will be less than substantial harm (Minor) to the asset.</p>
<p>This is particularly unfortunate since Appendix 3 of Chapter 10 of the ES ('Landscape and visual impact') identifies the significance of the effects of construction and operation, and the residual effect of the proposed development, on the setting of SM1017582 as 'major adverse' in each case. We are concerned, therefore, about the failure to ensure a proper correlation between chapters 8 and 10 of the ES.</p>	<p>The Landscape and Visual Impact Assessment (LVIA) presented in Chapter 10 of the ES assessed assets at the same location as the moat, but did not assess the Scheduled Monument. The LVIA assessed a residential property and an open space, as well as assessing the potential effect upon "views and visual amenity as experienced by people (the visual effects)". The LVIA identified residential receptors and open spaces of Very High value. The receptor values, and therefore the significance of effect, are not comparable between the Cultural Heritage and Landscape and Visual assessments.</p> <p>The Cultural Heritage assessment (presented in Chapter 8 of the ES) did not assess impacts to residential amenity or to views from open spaces – other than where they</p>

	<p>would form an intentional or otherwise important part of a setting that in turn contributes to the significance of the asset.</p> <p>There is no intervisibility between any of the contemporaneous assets i.e. other moated sites and therefore no visual impact. Although there will be changes to the view, the view would need to be shown to be significant to the setting.</p>
<p>We also have concerns about the way the information in chapter 10 and its appendices is presented. Whilst we accept that full planning permission is being sought for only one warehouse, with outline permission for other manufacturing and logistics development, we would have expected the photo sheets presented in support of the Landscape and Visual Impact analysis to at least have indicated the height as well as the position of the individual elements of the Proposed Development.</p>	<p>The Old Moat House (SM1017582) falls within the visual envelope for the Proposed Development and hence was scoped into the LVIA. LVIA assesses the potential effect upon “views and visual amenity as experienced by people (the visual effects)”. The LVIA undertaken for the Proposed Development therefore assesses the potential effect arising from the Proposed Development upon a person, or persons, situated at/visiting the Scheduled Monument i.e. not the asset per se. This latter aspect of assessment is addressed in the potential effects upon ‘setting’ undertaken in the Cultural Heritage assessment and addresses a different aspect of potential impact. The LVIA methodology clearly states that all assessment is undertaken from publicly accessible locations i.e. no private land is entered (the Scheduled Monument is located on private land hence views were assessed from the adjacent public right of way), based upon a ground level receptor location with views from eye level. The field inspections took place during November 2019 hence vegetation (deciduous) was not in leaf and views can be considered a ‘worst case’ scenario for the relevant visual receptor.</p>
<p>The photo sheets appear to show only the extent of the proposed development, and as a result it is impossible to be certain that the potential visual impacts have been properly assessed. This is compounded by the limited number of viewpoints in the vicinity of these important cultural heritage receptors.</p>	<p>In respect of viewpoint locations, all locations were agreed with the local planning authority and form representative viewpoints. Similarly, the location of montages was also agreed with the local planning authority.</p>
<p>Historic England therefore considers that the application as submitted contains insufficient information to allow the impact of the Proposed Development upon the settings of key designated heritage assets to be properly assessed, or the suitability of the measures proposed to mitigate that impact to be confirmed.</p>	<p>Please refer to responses above.</p>
<p>We consider that Chapter 8 of the ES needs to be revised to include consideration of the</p>	<p>As outlined in the responses above, the impact of the Proposed Development on the setting of SM1017582 is</p>

<p>impact of the Proposed Development on the setting of SM1017582, and the pictorial supporting information for the Landscape and Visual Impact assessment also needs revision so that the scale and siting of the elements of the Proposed Development can be properly appreciated.</p>	<p>considered fully in the HEDBA that forms an appendix to the ES. In respect of viewpoint locations, all locations were agreed with the local planning authority and form representative viewpoints. Similarly, the location of montages was also agreed with the local planning authority. Given the current nationwide lockdown it has not been possible to revisit the site and take the photographs necessary to address this point, however we would point out that this receptor has been assessed in the LVIA and it is considered inclusion of this would have no effect on the LVIA outcomes.</p>
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