

To Jennifer Bolton Ref: P/2020/0061/HYBR

From Ian Bond – Growth Lancashire

Subject Conservation Comments

Date 31 March 2020

Proposal: Hybrid PA for; Full PP for the erection of a B8 logistics warehouse, with ancillary offices, car parking, infrastructure and landscaping; and Outline PP for manufacturing B2 and Logistics B8 development with ancillary offices, associated access and infrastructure works (detailed matters of appearance, landscaping, layout and scale reserved)

Site Address: Land to the west of Omega South and south of M62, Bold, St Helens

Site / Building / Location

The site relates to a large area (18.5 hectares) of farm land south of the M62 with its eastern boundary adjoining onto Omega South.

Designations

A large number of designated and non-designated heritage assets lie on the land surrounding the site and are identified in the supporting documents (Chapter 8 of the Environmental Statement – Cultural Heritage).

The summary of the above document identifies a total of 57 heritage assets within the study area, 15 of which are designated (10 Listed Buildings and 5 Scheduled Monuments).

Legislation

The principle statutory duty under the Planning (Listed Building and Conservation Areas) Act 1990 is to preserve the special character of heritage assets, including their setting. LPA's should, in coming to decisions, consider the principle Act which states the following;

Listed Buildings – Section 66(1)

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have

special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Planning Guidance and Policy

NPFF

In determining planning applications LPA's should take account of;

- a. The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b. The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c. The desirability of new development making a positive contribution to local character and distinctiveness.

P.193 states that when considering the impact of proposals on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be applied. This is irrespective of whether any harm is identified as being substantial, total loss or less than substantial harm to its significance.

P.196 identifies that where a proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

P. 200 states that LPA's should look for opportunities for new development within CA's and within the setting of heritage assets to enhance or better reveal their significance. Proposals which preserve those elements of the setting that make a positive contribution to the asset should be treated favourably.

Local Plan

St Helens Local Plan Core Strategy (adopted Oct 2012)

Policy CQL4

Saved Policies of the St Helens 1998 Unitary Development Plan

Policies ENV24B and ENV25

St Helens Borough Local Plan 2020-2035 Submission Draft (not yet submitted for Examination so limited weight)

Assessment

I have read through the relevant supporting documents which includes Chapter 8 Cultural Heritage (Volumes 1 and 2 plus appendices) of the Environmental Statement produced by WSP, dated January 2020. This includes a Historic Environment Desk based Assessment.

I am also mindful of the views made by Historic England in the letter dated 24 February 2020.

For avoidance of doubt my comments relate to above ground heritage matters only and I will leave issues relating to the value of the wider archaeology of the site/surroundings to other consultees.

The key heritage issues for the LPA to consider are:

1. The level of the impacts, if any, of the proposal, on the significance of any of the designated heritage assets identified, which includes their setting
2. The level of impacts, if any, on any non-designated heritage assets

Proposed work

The scheme involves the erection of a logistics warehouse totalling approximately 79 000 sq. metres of space together with an outline proposal for a further 107 000sq.metres of B2 and B8 uses.

Impact on the setting to designated heritage assets

I visited the site and surrounding area and have considered the context in which the development will sit from various locations around the site, including a number of the key/closest heritage assets identified in the documents.

Firstly, I agree with Historic England's view that the application submission should have included photographic evidence to enable a more accurate and proper assessment. It is common for large scale development proposals i.e. wind turbine proposals, to have photo montages from various key locations, included with the submission. This enables consultees to look carefully at the visual experience of the building within the landscape and how views may be changed/impacted upon.

Notwithstanding the above I have made an assessment based upon the information provided.

In this respect I find the documentation generally to be a fair and robust desk top assessment and the methodology to be appropriate.

Historic England's advice on setting is contained in its Planning Note 3 (second edition) entitled *The Setting of Heritage Assets* describes the setting as being the surroundings in which a heritage asset is experienced and explains that this may be more extensive than its immediate curtilage and need not be confined to areas which have public access. Whilst setting is often expressed by reference to visual considerations it is also influenced by the historic relationships between buildings and places and how views allow the significance of the asset to be appreciated.

From my site visit I found the landscape to be flat farmland interspersed with large wooded areas which have the effect of breaking up long distant views. This is true of the south and south west where woodland limits the extent of views across the site. To the north the land is more open and appears to fall down towards the M62. These more distant views are already degraded by other large scale developments.

The closest heritage asset is Old Bold Hall moated site which sits within a wider non-designated medieval and post medieval park land setting, which includes 2 listed buildings (gate piers and bridge). I feel that whilst the development of the logistics 'shed' is likely to be noticeable from the location the level of harm to the setting because of the distance will only be minor.

There are 10 designated Listed Buildings within the area;

Table 7-3 identifies the contribution made by the settings to the significance of the heritage assets. I agree with the finding in this Table which identifies the contribution made by setting and the level of harm caused by the development.

Harm is identified to;

Walled garden adjoining site of former Bold Hall	negligible
Farmhouse at former Bold Hall Estate	adverse harm
Former stables at Bold Hall Estate	adverse harm

A summary of the impacts on heritage assets is included in Table 8.8 of Volume 1 of Chapter 8 of the ES. I agree with the summary included for the each of the assets identified and accept that some of the likely impacts will be temporary during the construction phase.

Having regard to all of the above, I consider that overall the proposed development would only likely lead to a low level of harm to the significance which I would regard as being slight within the spectrum of less than substantial harm as identified under p.196 of NPPF. You will need to give great weight to this harm in your planning balance. However under P.196 the harm can be weighed against the public benefits of the proposal. Information on what is meant by the term public benefits is included in the Planning Practice Guidance and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8).

In my view this slight harm may be mitigated by undertaking appropriate landscape works to reduce the visual impact of the buildings within the wider landscape.

Impact on non-designated assets

The recorded non designated assets relate to a mix of above and below ground assets, identified in Table 5-3 of Volume 2 of the Historic Environment Desk based Assessment.

On the whole these assets are of a lower significance. Any harm caused to their historic settings should be regarded as negligible.

Conclusion / recommendation

As I am required to do so, I have given the duty's imposed by s.66(1) of the P(LBCA) Act 1990 considerable weight in my comments.

I agree with the findings of the submitted ES and feel the proposal would cause some low level (slight) harm to the setting of the listed buildings on the former Bold Hall Estate.

Other harm to the setting of heritage assets are identified in the submission, these relate to the scheduled monuments at Old Moat House and Old Bold Hall. The level of harm is likely to be low. You need to clarify this matter with your Archaeological advisor

This harm should be regarded as being contrary to Chapter 16 of the NPPF, Policy CQL4 of the St Helens Core Strategy and Policy ENV24B of the Saved Policies of the St Helens 1998 Unitary Development Plan.

In respect to the harm, as indicated above it is down to the LPA to consider the wider public benefits of the proposal in its planning balance, remembering that great weight should always be given to any harm to the heritage asset(s).

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