



Historic England

By Email: [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk)

Our ref: PL000774402

Your ref:

Date 21 July 2022

Dear Sir/Madam

**Consultation: Wirral Local Plan 2021 –2037 Submission Draft – Publication for Representations (Regulation 19)**

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 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.

Wirral has an extremely rich and diverse historic environment. With this wealth of heritage, it is essential that the Local Plan, as a whole, sets out a robust policy framework for its future management.

Local Plan

Historic England extremely concerned about the lack of a strategic policy for the historic environment in the Plan. We consider that the lack of a locally specific detailed policy to set out the strategy for the historic environment across the Wirral to be a serious omission. The drafted Policy WD2.1, only presents a framework for managing proposals affecting heritage assets. It does not set out spatially the elements that contribute to Wirral's unique character and provide detail on how this is going to be

delivered as required in the NPPF. Further information on this is provided within our response.

The evidence base for the individual site allocations includes Heritage Impact Assessments (HIA). Whilst Historic England welcomes the Council undertaking this work, the content of the document is not tied into the Plan. The individual site policies therefore do not contain guidance specific to the site that will safeguard the future of the heritage assets in line with the requirements of the NPPF. Historic England has suggested that the Plan be amended to ensure that reference to these mitigation measures is tied into the Plan. This could be done through additional bullet points that include the mitigation measures or direct reference to the HIA within the policy.

In addition, we have also raised concerns about the tall building policy which fails to provide a robust and relevant framework to guide development for tall buildings within the Borough supported by an appropriate evidence base. The lack of a place specific approach and support from a clear understanding of context (informed through evidence), fails to conserve and enhance the historic environment as required in the NPPF.

The table (attached to this letter) provides further detailed comments on the Plan. We have also provided a response to the Sustainability Appraisal (see letter reference PL0077442, which should be read in conjunction with this letter.

Historic England would welcome the opportunity to work with you to resolve the matters raised prior to examination.

Yours sincerely,

***E.Hrycan***

**Emily Hrycan**

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Development Advice

Historic England

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## Table of Historic England's comments on the Wirral Local Plan Publication Draft

**July 2022**

Page	Section	Sound/Unsound	Comments	Suggested Change
31	Overview of the Borough  Para 2.14	Unsound	There is no content within the overview of the Borough which sets out the historic environment of the Wirral and how it contributes to its special character and identity. This paragraph just states that the Borough has a rich heritage.	That additional text should be provided to ensure that the overview of the Borough treats the historic environment equally in line with other matters.
34	Para 2.17 Bullet xxii	Sound	We welcome the Plans recognition of the historic environment in its list of issues that it will need to address for the Wirral.	-
38	Local Plan Vision	Sound	We welcome the content of the Local Plan Vision for 2037.	-
40	Para 2.39	Sound	We welcome the content of the strategic objectives for the Local Plan including in particular Strategic Objective 8.	-
47	Para 3.10	Sound	We welcome the vision for Birkenhead.	-
65	Policy WS 3.2 Housing Density	Unsound	Historic England recognises that the provision of more homes across England is a Government priority with increasing residential density of development identified in the Housing White Paper and the NPPF as a key way of meeting growing housing need. In light of this it is important that the impact of such proposals, have a positive relationship between any new development and the existing character of a place and the historic environment. Indeed, the NPPF requires that providing more homes is more about just a greater quantity of homes it is also about quality and the need to understand and reflect local conditions.	The policy should be expanded to define the application of the policy in a more detailed way and to demonstrate why it might not always apply. See comments for further information.

Page	Section	Sound/Unsound	Comments	Suggested Change
			<p>The NPPF also requires planning policies and decisions to address the connections between people and places and the integration of new development into the natural, built and historic environment. Policy WS 3.2 does not provide a balanced approach to new housing density and provides more emphasis on setting minimum requirements. There is little information on how, where and why these minimum densities might apply – with only a reference to ‘site characteristics’.</p> <p>In addition, we are concerned that there is no caveat that allows for a variety of densities (some of which can be lower than that listed) in the identified zones and that which recognises that within these zones this policy might not always apply.</p> <p>This contradicts the requirements of the NPPF in which the starting point of any new development should be its location and what the local natural, built and historic environment is like including the setting of heritage assets further afield. This ensures that the density on the site will be appropriate and enhances its context – variations in density may be required in order to mitigate harm to heritage assets for example or to relate to local character. The policy needs to be amended to ensure that the policy starts with what defines development densities and not the actual density itself. In addition, the lack of a section to guide new development proposals including design and heritage as well as local context, further weakens the need for development to be appropriate to its context and minimise any harm.</p>	

Page	Section	Sound/Unsound	Comments	Suggested Change
73	Para 3.99	Sound	We welcome recognition of the contribution heritage makes to Wirral's visitor economy.	-
756	Policy WS4.3 The Port and Maritime Zone  Bullet E6	Unsound	The NPPF requires that any proposals affecting heritage assets should avoid harm to the significance of heritage assets, and if this harm cannot be avoided then this needs to be mitigated.  Bullet E6, incorrectly refers to 'adverse impact' and it is worded to suggest that development will be approved where it can be mitigated. It is expected that proposals should sustain and enhance the significance of heritage assets and avoid any harm.	Bullet E6 be reworded to read:  ' <u>can demonstrate that there will be no harm any adverse impact on the historic environment, heritage assets, and their setting neighbouring uses and the environment can be mitigated.</u>
78	Para 3.112	Sound	We welcome recognition of the contribution that green and blue infrastructure can make to heritage assets and the quality of the environment.	-
86	Policy WS 5.1 Green and Blue Infrastructure	Sound	Wirral has four registered parks and gardens which are designated heritage assets. We welcome the content of the policy including the content of Bullet A1, which seeks to protect green and blue infrastructure in line with the relevant legislation.	-
94	Policy WS 6.1 Placemaking Principles	Sound	We support the content of Policy WS 6.1 as it seeks to conserve and enhance the historic environment in line with the requirements of the NPPF.	-
95	Policy WS 6.2 Gateway areas	Unsound	It is unclear from the policy and supporting text how this policy will be applied and how 'gateway' and 'landmark' is defined. There is a wide range of preferred definitions of these words which can mean a tall building for example.  Developments as such can have an impact on the historic environment and therefore the policy needs to be expanded to	The Policy should be amended, and definitions provided on the terminology used to ensure that in its application it doesn't promote development that will harm the historic environment.

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			provide further clarity on what it means and how it will be applied and used in any development proposals.	
95	Policy WS 6.3 Masterplan areas	Sound subject to minor amendment	<p>We welcome the content of this policy and the need for development to be guided by masterplans which should be developed for the listed areas. We also support the supporting text that states that they should be produced with regard to the Placemaking Policy (WS 6.1) as well as other policies of the local plan (see paragraph 3.156). However, there is no requirement within the policy for this – there is other requirements such as background evidence, national design guides etc but nothing about what is contained within Para 3.156.</p> <p>It is therefore recommended for consistency that the policy WS 6.3 be amended to ensure that it reinforces all requirements contained in the supporting text for the masterplans.</p>	<p>Bullet G should be amended to read:</p> <p>Masterplans should have regard to <u>other relevant policies in the Local Plan including Policy WS 6.1 Placemaking</u>, relevant strategies and background evidence base documents produced by the Council, including Neighbourhood Frameworks</p>
97	Para 3.164	Unsound	<p>Historic England objects to the content of this paragraph and its definitions of tall buildings. The paragraph proposes the definition of tall buildings within the Wirral without any evidence to support this definition. Historic England has some advice on Tall Buildings which provides further detailed support on this topic (<a href="https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/">https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/</a>).</p> <p>The NPPF (paragraph 8) defines the protection and enhancement of the historic environment as a key aspect of sustainable development's environmental objectives.</p>	<p>The Council needs to commission evidence to support the content of this paragraph or any amendments (pending its findings). Without the evidence base, the plan cannot demonstrate that it can conserve and enhance the historic environment in line with the requirements of the NPPF</p>

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			<p>Definitions of tall buildings can vary, but in general they should be informed by an assessment of local context and character. Other methods of definition may be appropriate depending on local circumstances. For instance, the 'Guidance Notes for Design Codes' defines a tall building as a structure that exceeds the general height guidance for a particular area type (paragraph 117). Whereas the 'London Plan' (2021) - which is a good example of a plan that sets out a clear strategy for the development of tall buildings – requires local authorities to define what is tall, based on evidence of the local context, and, for those situations where such a definition is absent, there is a minimum height threshold for the policy to be applied.</p> <p>Ensuring that there is a robust evidence base that also includes character and context can ensure that in defining tall buildings it is based on an assessment of local character, which contributes to local context, helps to identify potential impacts in respect of proposed height, mass and location of tall buildings' (Historic England's 'Good Practice Advice in Planning Note 3: The Setting of Heritage Assets' paragraph 7).</p> <p>In view of this, the Council needs to commission evidence to support the content of this paragraph or any amendments to the plan (pending its findings). Without the evidence base, the plan cannot demonstrate that it can conserve and enhance the historic environment in line with the requirements of the NPPF.</p>	
100	Policy WS 7.5 Tall Buildings	Unsound	Development plans and planning decisions need to promote sustainable development. The NPPF (paragraph 8) defines the protection and enhancement of the historic environment as a key aspect of sustainable development's environmental	The Policy needs to be amended to ensure that it provides a robust plan-led approach to tall buildings. The Council needs to

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			<p>objectives. Therefore, tall building proposals that take account of the historic environment and are designed to avoid or effectively mitigate harm to it, would constitute sustainable development in heritage terms.</p> <p>The NPPF goes on to emphasise the importance of a plan-led approach (paragraph 15) which can be used to direct the location and development parameters of tall building development and help deliver sustainable development.</p> <p>Tall building development by its nature can have transformational impacts upon a place. This can be achieved without harm to heritage primarily by focusing on sustainable locations and avoiding or effectively mitigating impact on the significance of heritage assets.</p> <p>The development of tall buildings can have positive impacts upon an area, particularly if they are part of a wider regeneration scheme. Equally, there will be sites where the impacts upon the historic environment cannot be overcome or minimised. Such sites may be inherently unsuitable for tall buildings due to the harm they would cause to the significance of heritage assets.</p> <p>Therefore, there is an opportunity for a local plan to implement a robust tall building policy which sets out clear development parameters, which can mitigate the risk of harm to the historic environment including acceptable zones, design coding, height parameters and other locally specific measures. Underpinned by proportionate evidence to direct tall buildings to suitable</p>	<p>commission evidence to support the content of this policy or any amendments (pending its findings). Without the evidence base, the plan cannot demonstrate that it can conserve and enhance the historic environment in line with the requirements of the NPPF</p>



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			<p>locations. Historic England has guidance on best practice for tall buildings that can provide further information and support (<a href="https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/">https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/</a>).</p> <p>In view of this, Historic England is concerned that the policy as drafted fails to provide a robust framework to guide the development of tall buildings within the Wirral, nor is it supported by a robust evidence base. The policy does not really go beyond what a generic design policy would consider, other than to specify planning application requirements for tall buildings which lacks detail and is inconsistent. It also does not provide a place specific approach and be supported by a clear understanding of the context (supported by an evidence base). In addition, there are also elements that are contrary to the requirements of the NPPF such as 'acknowledge and respect the heritage context'. This is not in line with the requirements of national policy with regards the historic environment, heritage assets and their setting.</p>	
101	Para 3.170	Unsound	It is suggested that reference to outline proposals for tall buildings might be acceptable. Given the impact such structures can have and the need for even the principle to be accompanied by a high level of detailed information, the encouragement of outline proposals would not assist in addressing these matters.	Delete reference to ' <i>outline proposals for tall buildings might be acceptable</i> '.
104	Para 3.179	Sound	We welcome recognition of the need for a balanced approach to protecting the heritage assets of the Wirral whilst ensuring that they can contribute to climate change and reducing climate emissions.	-

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107	Policy WS8.2 Sustainable Construction	Unsound	<p>The energy efficiency and carbon performance of most historic buildings can be improved and assumptions about poor performance are not always justified. However, standard approaches and the unintended consequences of not getting the balance right can result in harm to the significance of the heritage asset, as well as harm to human health and building fabric and failure to achieve predicted savings or reductions in environmental impact.</p> <p>The policy provides an overarching requirement for all development proposals of new and refurbished buildings, without any exclusions.</p> <p>The NPPF requires that proposals affecting a heritage asset should sustain and enhance their significance. This also includes avoiding any unnecessary harm as well. In view of this the policy as drafted, fails to safeguard them from inappropriate development (and harm)</p>	The policy should be amended to clarify the instances where the requirements will not apply e.g., heritage assets.
108	Policy WS 8.3 Improvements to Historic Buildings	Unsound	<p>The NPPF requires that proposals affecting a heritage asset should sustain and enhance their significance. This also includes avoiding any unnecessary harm as well.</p> <p>The title refers to historic buildings, but the policy text uses heritage assets – it would be helpful for clarity in its application that a single term is used.</p> <p>The policy seeks to only ensure that the significance of the asset is not compromised. which is not in line with the requirements of the NPPF. In addition, it would be helpful to define in the supporting text what a historic building is and</p>	<p>Line one ‘compromised’ should be replace with ‘harmed’.</p> <p>Supporting text should be expanded to include definition of a historic building (and amendments to terminology within the policy).</p>

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			whether this means heritage assets or any building as defined by the Council.	
110	Para 3.191	Unsound	In addition to the bulleted list, applicants will need to demonstrate a thorough understanding of the significance of the building through a heritage statement and this should be included in the requirements	An additional bullet point to be inserted to cover the need for a heritage statement.
130	Policy RA1 Seacombe River Corridor Regeneration Area	Unsound	<p>The NPPF requires that development proposals should protect/sustain and enhance the significance of heritage assets including their setting, the policy only refers to setting, which reduces the protection of the mentioned heritage assets.</p> <p>For example, Wallasey Town Hall is a designated heritage asset, the policy proposed alternative uses as well as development within its setting. There is also a need for proposals to consider the impact on the historic environment as well, rather than just individual assets.</p> <p>Therefore, the policy needs to be amended to ensure that it provides an appropriate framework for the management of heritage assets in line with the requirements of National Policy.</p>	The text should be amended so that it covers heritage assets and the historic environment and not just setting.
134	Policy RA2 Scotts Quay Regeneration Area	Unsound	<p>The NPPF requires that development proposals should protect/sustain and enhance the significance of heritage assets including their setting, the policy only refers to setting, which reduces the protection of the mentioned heritage assets.</p> <p>For example, a designated heritage asset might be converted into an alternative use, which would need to consider the actual asset's significance which includes setting.</p>	The text should be amended so that it covers heritage assets and the historic environment and not just setting.

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			<p>There is also a need for proposals to consider the impact on the historic environment as well, rather than just individual assets.</p> <p>Therefore, the policy needs to be amended to ensure that it provides an appropriate framework for the management of heritage assets in line with the requirements of National Policy.</p>	
139	Policy RA3 Birkenhead Waterfront Regeneration area	Sound	We welcome the content of the policy which ensures that development proposals will conserve, and enhance the area's historic environment, heritage assets and their setting in line with the requirements of the NPPF.	-
145	Policy RA4 Central Birkenhead Regeneration Area	Sound	We welcome the content of the policy which ensures that development proposals will conserve, and enhance the area's historic environment, heritage assets and their setting in line with the requirements of the NPPF.	-
153	Policy RA5 Hind Street and St Werburgh's Regeneration Area	Unsound	<p>The NPPF requires that development proposals should protect/sustain and enhance the significance of heritage assets including their setting, the policy only refers to setting, which reduces the protection of the mentioned heritage assets.</p> <p>There is also a need for proposals to consider the impact on the wider historic environment as well.</p> <p>Therefore, the policy needs to be amended to ensure that it provides an appropriate framework for the management of heritage assets in line with the requirements of National Policy.</p>	The text should be amended so that it covers heritage assets and the historic environment and not just setting.

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157	Policy RA6 Wirral Waters Regeneration Area	Unsound	<p>The NPPF requires that development proposals should protect/sustain and enhance the significance of heritage assets including their setting, the policy only refers to setting, which reduces the protection of the mentioned heritage assets.</p> <p>There is also a need for proposals to consider the impact on the wider historic environment as well.</p> <p>Therefore, the policy needs to be amended to ensure that it provides an appropriate framework for the management of heritage assets in line with the requirements of National Policy.</p>	The text should be amended so that it covers heritage assets and the historic environment and not just setting.
164	RA7 Hamilton Park Regeneration Area	Unsound	<p>The NPPF requires that development proposals should protect/sustain and enhance the significance of heritage assets including their setting, the policy only refers to setting, which reduces the protection of the mentioned heritage assets.</p> <p>There is also a need for proposals to consider the impact on the wider historic environment as well.</p> <p>Therefore, the policy needs to be amended to ensure that it provides an appropriate framework for the management of heritage assets in line with the requirements of National Policy.</p>	The text should be amended so that it covers heritage assets and the historic environment and not just setting.
176	RA10 New Brighton Regeneration Area	Unsound	<p>The NPPF requires that development proposals should protect/sustain and enhance the significance of heritage assets including their setting, the policy only refers to setting, which reduces the protection of the mentioned heritage assets.</p>	The text should be amended so that it covers heritage assets and the historic environment and not just setting.

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			<p>There is also a need for proposals to consider the impact on the wider historic environment as well.</p> <p>Therefore, the policy needs to be amended to ensure that it provides an appropriate framework for the management of heritage assets in line with the requirements of National Policy.</p>	
176	RES-RA10.1 Former Grand Hotel, Marine Promenade, New Brighton	Unsound	The Council has undertaken a heritage impact assessment to support the inclusion of this site in the plan which includes mitigation measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.	The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.
176	RES-RA10.3 New Palace Amusements	Unsound	The Council has undertaken a heritage impact assessment to support the inclusion of this site in the plan which includes mitigation measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.	The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.

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			Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.	
177	RA10 New Brighton Regeneration Area  Fort Perch Rock and Lighthouse	Unsound	<p>Forch Perch Rock and Lighthouse are both Grade II* heritage assets. Within the NPPF, Grade II* heritage assets are of the highest significance and therefore, the plan should ensure that they are managed in line with their designation.</p> <p>Whilst we welcome the intention of this section of the policy it only seeks for proposals to protect their special historic interest and positively contribute to their character and setting. However, setting is an important part of a heritage asset's significance and therefore it should be treated in the same way rather than only requiring proposals to 'positively contribute to it'.</p> <p>The NPPF requires development proposals to sustain and where appropriate enhance the significance of a heritage asset including their setting. As drafted, the policy fails to safeguard these assets from harm.</p>	<p>The text should be amended to ensure that the special historic interest/significance of the asset is protected and enhanced which includes their setting.</p> <p>The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.</p>
179	RA11 New Ferry Regeneration Area	Unsound	<p>The NPPF requires that development proposals should protect/sustain and enhance the significance of heritage assets including their setting, the policy only refers to setting, which reduces the protection of the mentioned heritage assets. There is also a need for proposals to consider the impact on the wider historic environment as well.</p> <p>Therefore, the policy needs to be amended to ensure that it provides an appropriate framework for the management of heritage assets in line with the requirements of National Policy.</p>	<p>The text should be amended so that it covers heritage assets and the historic environment and not just setting.</p> <p>The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific</p>

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				mitigation/enhancement measures.
186	Para 5.12 Bullet 8	Comment	We welcome the content of this bullet as it sets out a positive future for the management of Wallasey's historic environment	-
187	Policy WP1.1  Conservation Areas  Wellington Road  The Magazines	Unsound	<p>Historic England welcomes the inclusion of this policy.</p> <p>Development proposals whilst they are expected to preserve elements that positively contribute to a conservation area's significance there is also a need to look at opportunities to enhance a conservation area through new development or improvements to existing characteristics such as those identified within the policy. This is in line with national policy requirements.</p> <p>The Policy as drafted does not always encourage enhancement in all areas of the policy and focuses heavily on preserve. For example, in The Magazine's conservation area, there is a bulleted list (2 to 5) that only seeks to preserve elements such as character and layout and urban green spaces. Why would opportunities to enhance these not be supported as well?</p> <p>Therefore, in order to strengthen the policy, it needs to be amended to include references to 'enhance', so that it is in line with the NPPF.</p> <p>In addition, to support the implementation of this policy there should/will be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise,</p>	<p>The policy should be expanded to include reference to 'enhance' as well as the conservation area appraisal.</p> <p>For other changes see comments.</p>



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			there is no evidence to endorse these requirements or also require applicants to refer to this source of information in their applications.	
191	Policy WP 2.1 Conservation Areas Hamilton Square	Unsound	<p>Historic England welcomes the inclusion of this policy. Development proposals are expected to preserve and enhance elements that contribute to a conservation area's significance. This is in line with national policy requirements.</p> <p>In addition, to support the implementation of this policy there should/will be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise, there is no evidence to endorse these requirements and also require applicants to refer to this source of information.</p> <p>This will ensure that the policy positively manages Wirral's conservation areas in line with the requirements of the NPPF.</p>	The policy should be expanded to include reference to the conservation area appraisal.
193	Policy WP 2.3 Site EMP – SA2.2 Twelve Quays, Tower Wharf, Birkenhead (1.06ha)	Unsound	The Council has undertaken a heritage impact assessment to support the inclusion of this site in the plan which includes mitigation measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.	The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.

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			Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.	
197	<p>Policy WP 3.1</p> <p>Conservation Areas</p> <p>Bidston Village</p> <p>Birkenhead Park</p> <p>Oxton Village</p> <p>Rock Park</p> <p>Flaybrick Cemetery</p> <p>Clifton Park</p> <p>Mountwood</p>	Unsound	<p>Historic England welcomes the inclusion of this policy. Development proposals are expected to preserve and look for opportunities to enhance elements that contribute to a conservation area's significance. This is in line with national policy requirements. To support the implementation of this policy there will/should be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise, there is no evidence to endorse these requirements and also require applicants to refer to this source of information.</p> <p>Birkenhead Park is a Grade I heritage asset and therefore proposals are expected to sustain and enhance its significance rather than just its 'content' as drafted in Bullet B1.</p> <p>Flaybrick Cemetery is a Grade II* Registered Park and Garden and proposals are expected to sustain and enhance its significance as well as the other things listed. So should be amended.</p> <p>Bullet E5 – should be deleted as conservation area consent no longer exists.</p> <p>This will ensure that the policy positively manages Wirral's conservation areas in line with the requirements of the NPPF.</p>	<p>The policy should be expanded to include reference to the conservation area appraisal.</p> <p>Bullet B1 should be amended to include reference to significance.</p> <p>Section E should be amended to include reference to significance.</p> <p>Bullet E5 should be deleted.</p>

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199	Policy WP 3.3  Residential Sites  RES-SA3.2 Redcourt School, 7 Devonshire Place, Oxton	Unsound	<p>The Council has undertaken a heritage impact assessment to support the inclusion of this site in the plan which includes mitigation measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p>	The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.
204	Policy WP 4.1  Conservation Areas  Port Sunlight  Bromborough Village  Bromborough Pool  Lower Bebington	Unsound	<p>Historic England welcomes the inclusion of this policy. Development proposals are expected to preserve and enhance elements that contribute to a conservation area's significance. This is in line with national policy requirements. In addition, to support the implementation of this policy there will/should be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise, there is no evidence to endorse these requirements and also require applicants to refer to this source of information.</p> <p>There is an overarching need for proposals to sustain and enhance the significance of conservation areas in addition to those elements mentioned in the policy. Therefore, it should be amended.</p>	<p>The policy should be expanded to include reference to the conservation area appraisal and to ensure that proposals have due regard to significance in addition to those elements mentioned.</p> <p>Bullet B1 and C5 should be amended in line with comments.</p>

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			<p>B1 To ensure consistency with the National Heritage List for England, Bromborough Cross should be amended to the correct reference for clarity. In addition, Bromborough Cross is also a Grade II* heritage asset like St Barnabas Church, yet the policy does not seek to safeguard its significance.</p> <p>C5 Scheduled Monuments are of the highest significance and development proposals should avoid any unnecessary harm whilst sustaining and enhancing their significance. This bullet suggests that any proposals should seek to retain, preserve and maintain the scheduled monument with other non-designated heritage assets. This undermines the NPPFs requirements for scheduled monuments and they need to be treated in line with national policy.</p>	
208	<p>Policy WP 4.2</p> <p>Residential Sites</p> <p>Site RES 4.6 Former Croda, Prices Way</p>	Unsound	<p>The Council has undertaken a heritage impact assessment to support the inclusion of this site in the plan which includes mitigation measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p>	<p>The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.</p>

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228	Policy WP 6.1 Conservation areas Caldy West Kirby Old Village Kings Gap Hoylake Meols Drive	Unsound	<p>Historic England welcomes the inclusion of this policy. Development proposals whilst they are expected to preserve elements that positively contribute to a conservation area's significance (character and appearance) there is also a need to enhance a conservation area through new development or improvements to existing characteristics such as those identified within the policy. This is in line with national policy requirements. The Policy as drafted does not always encourage enhancement in all areas of the policy and focuses heavily on preserve. Why would opportunities to enhance these not be supported as well?</p> <p>Therefore, in order to strengthen the policy, it needs to be amended to include references to 'enhance', so that it is in line with the NPPF.</p> <p>In addition, to support the implementation of this policy there should be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise, there is no evidence to endorse these requirements and also require applicants to refer to this source of information.</p> <p>There is an overarching need for proposals to sustain and enhance the significance of conservation areas in addition to those elements mentioned in the policy. Therefore, it should be amended.</p>	The policy should be expanded to include reference to 'enhance' as well as the conservation area appraisal.
228	Policy WP 6.1	Unsound	D6 Historic England is concerned that bullet D6 as drafted promotes that back garden development is acceptable- even though it is putting on a caveat. The bullet should remove reference to 'within gardens' and amend the bullet to ensure	Bullet D6 should be amended to read:

Page	Section	Sound/Unsound	Comments	Suggested Change
	Bullet D6		that development responds appropriately to the existing built form and the immediate locality.	ensure that new development is of a scale, that preserves or enhances the character of the immediate locality, and responds appropriately to the existing built form;
229	Policy WP 6.3 Residential sites  RES-SA 6.4 Land at Grange Hill Farm	Unsound	The Council has undertaken a heritage impact assessment to support the inclusion of this site in the plan which includes mitigation measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.  Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.	The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.
233	Policy WP 7.1 Conservation Areas Gayton Village Heswall Lower Village	Unsound	Historic England welcomes the inclusion of this policy. Development proposals are expected to preserve and enhance elements that contribute to a conservation area's significance. This is in line with national policy requirements. In addition, to support the implementation of this policy there should be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise, there is no evidence to endorse these requirements and also require applicants to refer to this source of information.	The policy should be expanded to include reference to the conservation area appraisal.

Page	Section	Sound/Unsound	Comments	Suggested Change
			Bullet A2 :Gayton Hall is a Grade II* heritage asset and is of the highest significance. The policy fails to ensure that any proposals sustain and enhance its significance in line with the requirements of the NPPF.	Bullet A2 should be amended to ensure that proposals sustain and enhance the significance of Gayton Hall and its setting.
238	Policy WP 8.4 Conservation Areas Barnston Village Eastham Village Frankby Village Saughall Massie Village Thurstaton Thornton Hough	Unsound	<p>Historic England welcomes the inclusion of this policy. Development proposals whilst they are expected to preserve elements that positively contribute to a conservation area's significance there is also a need to enhance a conservation area through new development or improvements to existing characteristics such as those identified within the policy. This is in line with national policy requirements. The Policy as drafted does not always encourage enhancement in all areas of the policy and focuses heavily on preserve. Why would opportunities to enhance these not be supported as well?</p> <p>Therefore, in order to strengthen the policy, it needs to be amended to include references to 'enhance', so that it is in line with the NPPF.</p> <p>In addition, to support the implementation of this policy there should be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise, there is no evidence to endorse these requirements and also require applicants to refer to this source of information.</p>	The policy should be expanded to include reference to 'enhance' as well as the conservation area appraisal.

Page	Section	Sound/Unsound	Comments	Suggested Change
245	Policy WD 2.1 Protecting Heritage Assets	Unsound	The NPPF encourages proposals that both sustain and where appropriate, enhances heritage assets and Council's should support proposals that do so. In view of this and to ensure consistency with the approach to conservation areas in Policy WD 2.2 and Archaeological Assets (WD Policy 2.3) the title should be amended to just read heritage assets (without protecting).	<i>The title be amended to read 'Heritage Assets'.</i>
245	Policy WD 2.1 Protecting Heritage Assets	Unsound	<p>Historic England is concerned about the lack of a strategic historic environment policy within the Wirral Local Plan. The NPPF requires that Plans set out a positive strategy for the historic environment.</p> <p>We consider that the lack of a locally specific detailed policy to set out the strategy for the historic environment across the Wirral to be a serious omission.</p> <p>The NPPF requires that Plans set out a positive strategy for the historic environment, this includes strategic policies to deliver the conservation and enhancement of the historic environment at a local level.</p> <p>The drafted Policy WD2.1, only presents a framework for managing proposals affecting heritage assets. It does not set out spatially the elements that contribute to Wirral's unique character and provide detail on how this is going to be managed through a strategy and also wider proactive functions such as local lists, conservation area appraisals, heritage led regeneration etc.</p>	<i>The policy needs to be amended to ensure that it provides a strategic framework, that is locally specific to the Wirral. Historic England would be happy to provide additional support on this.</i>



Page	Section	Sound/Unsound	Comments	Suggested Change
			Without this, the Plan does not meet the requirements of the NPPF and therefore needs to be amended.	
245	Policy WD 2.2 Conservation Areas	Comment	Historic England welcomes the inclusion of this policy. However, the policy would benefit through references to the specific area policies contained in the plan.	-
368	Appendix 18 Housing Allocations of 1-9 Units RES- SA4.16 Methodist Church, Lower Bebington	Unsound	The Council has undertaken a heritage impact assessment to support the inclusion of this site in the plan which includes mitigation measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.  Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.	The policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.