



BY EMAIL:

planningpolicy@cheshirewestandchester.gov.uk

Our ref: PL00793309

Your ref:

Date: 28 July 2025

Dear Local Plans Team

### **Cheshire West and Chester: Local Plan Issues and Options**

Thank you for consulting Historic England on the above. This response details the expectations of the Local Plan for Cheshire West and Chester and the historic environment together with some answers to the consultation questions.

Historic England would welcome the opportunity to work with you to ensure that the historic environment is appropriately dealt with in the Local Plan. The consultation refers to the previous adopted Local Plan as a basis for policies for the new Plan. It is important that policies are updated and improved to ensure that they are robust and sound. We would welcome a meeting to discuss this and to provide support on them.

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

Historic England has produced a number of good practice advice notes on the historic environment, in particular the [Good Practice Advice Note on the Historic Environment and Local Plans](#) which provides supporting information on good practice in plan-making, and the [Historic Environment and Site Allocations in Local Plans](#) may be useful in the production of your Plan.

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



## Evidence base

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

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

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

Potential sources of evidence include:

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

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

## Spatial Portraits

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

## Vision and Objectives



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The historic environment, heritage assets and their setting is an important aspect of contributing to successful places and their character and identity. The vision for the Local Plan fails to make reference to this, only the special character of villages. This needs to be amended to ensure that it meets the requirements of the NPPF and national policy on this matter. We support the objectives in the adopted local plan although it should be expanded to include reference to archaeology given its importance in the Plan area.

## **Local Plan Policies**

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

### Strategic policies

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

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

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

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



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

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

#### Development Management Policies

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

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

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

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

#### Strategic Cross Boundary Issues



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

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

These strategic issues will not necessarily and always be the same as the strategic policies for the protection and enhancement of the historic environment included in a Local Plan but are likely to be a sub-set of them. Indeed local circumstances may indicate that strategic approaches may not always be needed. The sustainability appraisal scoping report should help to identify what is important for a particular plan area.

### Site Allocations

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

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

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



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

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

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

### **Consultation Questions**

#### *Question SD1:*

Reference to the historic environment is supported. Heritage asset and settings should also be included.

#### *Question SD3:*

Climate change adaptations and proposals are not always appropriate to the historic environment, heritage assets and their setting. Therefore, it is important that there is a caveat in the local plan recognising that alternative solutions may be needed.

#### *Question SS4*

Whilst we agree with using sustainable locations for new development unslung brownfield land, it is important that the impact that these have on the historic environment, heritage assets and their setting is robustly assessed to accompany the Plan when dealing with allocation of sites. This is also relevant to ensuring that it enhances place, identity and character.

#### *Question SS6:*

Agree

#### *Question SS7:*

Agree

#### *Question SS8:*

Agree

#### *Question SS9:*

No circumstances have changed. Chester is still defined as a historic town with its green belt contributing to its historic setting.

#### *Question SS15:*



Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS16:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS18:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS21:**

See guidance on site allocations in this letter.

**Question SS23/SS24:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS26/SS27:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS29/SS30:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS32/SS33:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS35/SS36:**

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**Question SS38/SS39:**

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**Question SS41/SS42:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS44/SS45:**

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**Question SS47/SS48:**

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**Question SS50/SS51:**



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**Question SS53/SS54:**

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**Question SS56/SS57:**

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**Question SS59/SS60:**

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**Question SS62/SS63:**

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**Question SS65/SS66:**

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**Question SS68/SS69:**

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**Question SS71/SS72:**

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**Question SS74/SS75:**

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**Question SS77/SS78:**

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**Question SS80/SS81:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question SS83/SS84:**

Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question CH1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question CH2:**



Any option should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question CH10:**

Historic England would welcome the opportunity to work with you to ensure that any policy approaches are robust and reflect the designation and needs of the area.

**Question EP1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question EP2:**

Any use of previously developed land should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question NO1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question NO2:**

Any allocation/site should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question NO6:**

Historic England would welcome the opportunity to work with you to ensure that any policy approaches are robust and reflect the designation and needs of the area.

**Question WN1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places. Historic England would welcome the opportunity to work with you to ensure that any policy approaches are robust and reflect the designation and needs of the area.

**Question WN2:**

Any allocation/site should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question FR1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places. Historic England would welcome the opportunity to work with you to ensure that any policy approaches are robust and reflect the designation and needs of the area.

**Question NE1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places. Historic England would welcome the opportunity to work with you to ensure that any policy approaches are robust and reflect the designation and needs of the area.



Question MI1:  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places. Historic England would welcome the opportunity to work with you to ensure that any policy approaches are robust and reflect the designation and needs of the area.

*Question MI4:*  
Any allocation/site that is safeguarded should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

*Question GB1:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question TA1:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question EG1:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question TC1:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question VE1:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question VE5:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question HO6/HO7/HO8/HO9:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question HO15:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question GT1:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

*Question GT2/GT3/GT6/GT7:*  
Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.



**Question HW1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question FW1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question LA1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question LA2:**

Any allocation/site should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question HI1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question DS1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places. It incorrectly promotes development that is 'sympathetic' to heritage assets, which does not accord with the NPPF. Historic England would welcome the opportunity to work with you to ensure that any policy approaches are robust and reflect the designation and needs of the area.

**Question DS4:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question DS10:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question EN1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question EN4:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question EN6:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question MW1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.



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**Question MS1:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question MS2:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question MS3:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question MS5:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question MS6:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question MISC2:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places. Jodrell Bank is a World Heritage Site and therefore any policy should be produced to deal with this.

**Question MISC4:**

Any allocation/site should be accompanied by a robust assessment of the historic environment, heritage assets and their setting to inform the best solution.

**Question MISC9:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

**Question MISC10:**

Local Plan policies should seek to conserve and enhance the historic environment, heritage assets and their setting including improving character and identity of places.

Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the Council to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the strategic and development management policies, in the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. This will ensure that there is joined up and robust approach is undertaken to historic environment issues.

If you have any queries about this or would like to discuss anything further, please do not hesitate to contact me. We would welcome the opportunity to work with you on the production of the Local Plan for Cheshire West and Chester.



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Yours sincerely,

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