



Omega St Helens/T.J. Morris Limited

**SUPPLEMENTARY NOTE
(REBUTTAL) BY ELIZABETH
MURRAY (FOR THE APPLICANT)
ON CULTURAL HERITAGE**

Call-in by the Secretary of State of an application
made by Omega St Helens/T.J. Morris Limited

Land To The West Of Omega South & South Of The M62.
Bold, St. Helens

LPA REF: P/2020/0061/HYBR

PINS REF: APP/H4315/V/20/3265899

CD ##

April 2021



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TYPE OF DOCUMENT (VERSION) PUBLIC

PROJECT NO. 70060349

DATE: APRIL 2021

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1 RESPONSE TO ST HELENS BOROUGH COUNCIL TOPIC STATEMENT ON HERITAGE AND LANDSCAPE ASSETS

1.1 PERSONAL STATEMENT

My personal statement can be found in paragraphs 1.1.1 – 1.1.4 of my Subject Statement on Cultural Heritage (CD 38.10).

1.2 SUPPLEMENTARY NOTE

- 1.2.1. This Supplementary Note forms a response to the St Helens Borough Council Topic Statement on Heritage and Landscape Assets (CD 39.6).
- 1.2.2. The topic statement prepared by the Council on Heritage and Landscape Assets is largely in accordance with the points outlined in the Cultural Heritage Subject Statement, prepared on behalf of the Applicant.
- 1.2.3. The Representation made by the Council's Design and Conservation Officer draws the same conclusions in regard to the built heritage (above ground heritage matters) impacts as the both the Cultural Heritage ES Chapter and the summary in the Subject Statement, namely that there is slight harm to the significance of the heritage assets through changes in their setting. This position is apparently mirrored by Historic England, who have no objection to the scheme on heritage grounds.
- 1.2.4. The results of the consultation with Merseyside Environmental Advisory Service (MEAS) on matters of archaeology are also outlined. To avoid confusion, it should be noted that the programme of predetermination archaeological investigation referred to in paragraph 3.29 was that carried out in February 2020, the results of which were submitted as Archaeological Landscape Survey OPP. DOC 18 (CD 33.153), and that this is the same survey noted at Paragraph 6.23.
- 1.2.5. The recommendation in Paragraph 3.30 that '*submission of a planning application to develop the site is likely to meet with advice from MEAS that the applicant be required to undertake a programme of pre-construction archaeological works, secured by means of an appropriately worded planning condition*' was entirely reliant on 'positive' results being noted in the survey i.e. that there were remains dating to the medieval deer park within the application site. Deer parks were areas of land set aside and equipped for the management and hunting of deer and other animals. Usually they were surrounded by a park pale, a fenced or hedged bank with an internal ditch. It is known from historical records that the deer park at Bold had a park pale, but also that it was either no longer extant or was much degraded by the early 17th century (see previous Subject Statement CD 38.10, Paragraph 2.1.3).
- 1.2.6. It is worth reiterating that the findings of the Archaeological Landscape survey noted that there were no earthworks or elements that pre-dated the post-medieval period, with all plantations in the application site likely to be modern in date. These findings, in conjunction with the historical accounts noted in the HER entry for the asset, led MEAS to the conclusion that there were no extant remains of the deer park and that, therefore, there was no objection to the scheme on the grounds of archaeology, and that furthermore, no archaeological conditions needed to be applied to the application.

- 1.2.7. The representation by the Council's Countryside Development and Landscape Officer, at Paragraph 3.35, suggests that the application is contradictory to Policy BFP ENV3: Heritage, as the proposal *'will remove key features of the landscape, particularly the protected woodlands...'*. This position is contrary to the findings of the Archaeological Landscape Survey (CD 33.153). Whilst the area of the former Deer Park is noted as a non-designated heritage asset, this 'designation' relates to the location and former presence of the park rather than the presence of extant physical remains. There are no tangible remains for the application to impact on.
- 1.2.8. A number of the points raised within Section 4 are not within the remit of Cultural Heritage to address, however, it should be noted that:
- *This area forms the eastern part of Bold Forest Park, which includes the site of the ancient Bold Estate deer park.*
 - It is acknowledged in the Cultural Heritage assessment that the application site is within the location of the former Deer Park. However, this park is no longer extant with no tangible remains on which to impact. The park was heavily degraded by the early 17th century
 - *Historically part of Bold Estate established in the 1300s and all the woodland was well established in the 1800s. Which can clearly be seen on maps dating back to 1840's.*
 - The area was historically part of the Bold Estate. The estate was broken up and sold off from the mid-19th century onwards and is no longer a cohesive entity. Historical records suggest that the trees on the estate were felled for sale and that all the woodland currently present is likely to be modern managed plantation, sold to generate income for the estate.
 - *Destroying ancient woodland*
 - There is no ancient woodland within or near to the application site
- 1.2.9. The conclusion at Paragraph 7.1 that the application would cause harm to the deer park is not one supported by the Council's own archaeological advisor. The predetermination survey was recommended in order to investigate the presence, or otherwise, of remains associated with the former medieval Deer Park. The survey concluded that all earthworks within the application site are post-medieval or modern in date and that therefore there are no extant remains of the medieval park. As a result of the survey, I would recommend that the conclusion should be that there is no harm to the non-designated former Deer Park.



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