

Asland Walks Energy Park, Lancashire

Historic Environment Technical Note

On behalf of the Bretherton Energy Co-Operative and GA Pet Food

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Issue Sheet

Asland Walks Energy Park, Lancashire Historic Environment Technical Note

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1 Introduction

- 1.1 This Technical Note has been prepared by Lanpro Services Limited on behalf of Bretherton Energy Co-Operative and GA Pet Food to respond to public consultation raising heritage matters relating to the proposed development at proposed wind turbine (4.2MW), solar (12MW), battery storage (5MW) and the transmission infrastructure at land at the Asland Walks Energy Park site, Bretherton, Lancashire (25/01256/FULMAJ). It demonstrates that the approach accords with statutory duties, the NPPF (2024), and Historic England's Guidance on Heritage Impact Assessments (GPA3).
- 1.2 This document should be read alongside the submitted Heritage Statement (HS), which provides a detailed assessment of significance and the potential effects of the proposed development on the heritage assets concerned (Lanpro, 2025).

2 Public Responses Summary

2.1 A number of public representations raise heritage-related matters, either directly or as part of wider objections. The heritage issues raised fall into a number of recurring themes which are addressed below.

Methodology, Legislation, Policy and Guidance

2.2 Several representations make explicit reference to paragraph 215 of the National Planning Policy Framework (NPPF, 2024), raising concerns that the proposed development could result in harm to the significance of designated heritage assets and that such harm should therefore be weighed against the public benefits of the scheme. Some respondents question whether the Local Planning Authority can discharge its statutory duties without additional heritage information, including further visual material or a broader assessment of heritage assets. Some respondents consider that the scale of the proposed wind turbine, by reason of its height and prominence, must necessarily give rise to harm to heritage significance, thereby engaging the heritage planning balance set out in paragraphs 212–215 of the NPPF. These assume that visibility equates to harm and that any discernible change to the surroundings of a heritage asset constitutes an adverse effect on its setting.

Scope of the Heritage Assessment

2.3 A recurring query relates to the scope of the Heritage Statement and on the omission of specific designated assets from detailed assessment. Representations refer to listed buildings within Sollom and Bretherton and question why specific assets were scoped in or out of assessment, notwithstanding their designation status. Respondents query why some heritage assets at a greater distance from the Site were assessed, while others in closer proximity were scoped out.

Listed Buildings, Setting and Visibility

2.4 A number of responses raise the concern that the proposed wind turbine, due to its height and vertical form, would dominate the surrounding landscape and thereby harm the setting of nearby listed buildings. These representations often frame setting in predominantly visual terms, with particular emphasis placed on the introduction of a tall modern structure into a predominantly rural environment. Concerns are raised regarding references within the Heritage Statement to woodland belts, hedgerows, and other vegetation. Some respondents question whether such features should not be relied upon in assessing heritage impact, on the basis that vegetation may be altered or removed over time, and that any conclusions dependent upon screening are therefore unreliable.

Sollom Conservation Area

2.5 Several representations focus specifically on the Sollom Conservation Area, questioning whether the proposed development would harm its setting, character, and appearance. These responses suggest that the Conservation Area derives significance from its wider

rural surroundings and that any large-scale infrastructure visible beyond its immediate boundary would detract from its character.

Visualisation Requirements

- 2.6 A further theme relates to the visual information submitted with the application. Requests are made for additional photomontages or viewpoint-specific visualisations from locations including Liverpool Old Road, canal-side paths, and residential areas. These representations suggest that without such visual material, it is not possible to fully understand the impact of the development on heritage assets or their settings.

3 Methodology, Legislation, Policy and Guidance

3.1 The issues raised through consultation principally relate to the interpretation of heritage setting, the scope of assessment, and the relationship between visibility, change, and harm. The methodology adopted for the Heritage Statement has been informed directly by the relevant legislative framework, national policy, professional guidance, and local plan policy, all of which emphasise a significance-led and proportionate approach to heritage assessment.

3.2 National policy, as set out in Section 16 of the NPPF (2024), requires that planning decisions affecting heritage assets are based on an understanding of the significance of those assets and any contribution made by their setting. Paragraphs 207 and 208 are explicit that the level of detail required in support of an application should be proportionate to the importance of the heritage asset and no more than is necessary to understand the potential impact of the proposal.

3.3 Historic England's GPA3 provides the methodological framework for assessing setting and directly addresses several of the matters raised in consultation. In particular, GPA3 makes clear that:

- Setting is not defined by fixed distances or administrative boundaries;
- Visibility alone does not equate to harm; and
- Not all elements within the surroundings of a heritage asset contribute to its significance.

3.3.1 Historic England's GPA3, *The Setting of Heritage Assets Setting* (2017), was used to inform the methodology for the assessment. The guidance recommends that a systematic and staged '5-step process' to assessment should be adopted, to which the HS has adopted steps i) to iv):

- i. *identify which heritage assets and their settings are affected,*
- ii. *assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated,*
- iii. *assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it,*
- iv. *explore the way to maximise enhancement and avoid or minimise harm,*
- v. *make and document the decision and monitor outcomes.*

3.3.2 The production of the HS has taken into account the physical and sensory surroundings of the asset, in order to understand the contribution 'setting' makes to the heritage significance of the asset(s). This has included topography and intervening development and vegetation. It also considered how the asset is currently experienced and understood through its setting, in particular views to and from the asset and the site, along with key views, and the extent to which setting may have already been compromised.

3.4 The methodology does not rely on proximity as the determining factor for inclusion or exclusion of heritage assets. Instead, consistent with GPA3 and NPPF paragraph 208,

professional judgement was applied to determine whether the Site forms part of the setting of an asset in heritage terms. This approach also accords with:

- Policy BNE8 of the Chorley Local Plan, which requires applications to be in accordance with the NPPF and Historic England guidance and to be accompanied by a proportionate Heritage Statement; and
- Policy EN4 of the West Lancashire Local Plan, which requires sufficient information to assess impacts on heritage assets and their settings.

3.5 This guidance underpins the scoping exercise undertaken within the Heritage Statement, whereby assets were identified for detailed assessment only where there was a reasonable potential for the Site to contribute to, or detract from, the way in which their significance is experienced.

4 Scope of Heritage Assessment

Planning Background and Pre-Application Consultation

- 4.1 As set out in Section 5 of the Heritage Statement, heritage matters were informed by early consultation undertaken as part of the EIA Screening process (Ref. 25/00372/SCE). Consultation was undertaken with Growth Lancashire, acting on behalf of Chorley Council and West Lancashire Borough Council in respect of conservation matters. This consultation sought to establish the appropriate search areas for heritage assessment, and which designated heritage assets, if any, were sensitive to potential effects arising from the proposed development. The outcomes of this early engagement directly shaped the scope and methodology of the Heritage Statement, ensuring that assessment efforts were focused on those assets most likely to experience effects.
- 4.2 In the Screening Opinion response, Growth Lancashire confirmed that the principal heritage consideration is the potential effect of the scheme on the setting of nearby listed buildings and that only a limited and specific group of designated heritage assets were considered sensitive to potential change arising from the proposals.

Selecting Heritage Assets

- 4.3 Heritage assets were identified and scoped for assessment based on heritage significance and the realistic potential for the proposed development to affect that significance, particularly through changes to setting, consistent with Historic England's GPA3: The Setting of Heritage Assets. Assets were scoped in where there was a credible mechanism for harm identified from intervisibility, contribution of views to significance, experiential or associative relationships, or the role of landscape context in understanding the asset.
- 4.4 Conversely, a number of listed buildings, including those within Sollom, were scoped out where intervening distance, topography, or built form precludes meaningful intervisibility, and that any theoretical visibility would not affect how the asset is understood, appreciated, or experienced. Conversely several assets within Bretherton were considered to assess the potential impact of the Battery Storage structure, rather than long-distance views of the turbine.
- 4.5 This proportionate scoping approach accords with paragraph 200 of the NPPF, which explicitly discourages unnecessary assessment where no harm to significance can reasonably arise.

5 Listed Buildings, Setting, and Visibility

- 5.1 The Heritage Statement assesses the significance of each listed building scoped into assessment and considers whether the Site forms part of that significance. In each case, it determines the relative contribution of setting to the significance of the asset in the context of its architectural interest, historic fabric, and immediate historic context. The

assessment distinguishes clearly between change and harm, consistent with the NPPF, and established case law. Harm is assessed by reference to the degree to which change affects the reasons for which an asset is designated, rather than potential visibility of development.

- 5.2 The Heritage Statement's description of existing woodland belts and landscape structure is not relied upon as mitigation in its own right, nor treated as permanent screening. Instead, these features are described as part of the existing baseline setting as it is currently experienced. This approach is consistent with Historic England guidance, which recognises that setting is dynamic and must be assessed as it exists at the time of decision-making, rather than on hypothetical future change.

6 Sollom Conservation Area

- 6.1 The Sollom Conservation Area was considered at the scoping stage and was reasonably scoped out of detailed assessment. Its significance derives from its settlement form, historic buildings, and local townscape qualities. The Site does not form part of the Conservation Area's setting in heritage terms, nor does it contribute to the attributes which underpin its significance.
- 6.2 While elements of the proposed development may be visible in wider views, GPA3 makes clear that visibility alone does not amount to harm. The Heritage Statement therefore correctly concludes that the proposal would not result in harm to the significance, character, or appearance of the Sollom Conservation Area.

7 Visualisation Requirements

- 7.1 Representations requesting additional photomontages and viewpoint-specific visualisations are noted. In this regard, it is important to distinguish between visual information required to inform landscape and visual effects, and that required to assess effects on heritage significance. National policy and Historic England guidance do not require visualisations to be produced for all locations from which a development may be visible, but rather sufficient information to understand whether, and how, heritage significance may be affected.
- 7.2 Visual material submitted in support of the application was prepared as part of the Landscape and Visual Appraisal (LVA) and was developed through iterative discussion with heritage professionals to ensure that viewpoints were representative of those locations where potential effects on the setting of heritage assets could reasonably arise.
- 7.3 The Heritage Statement is supported by a site visit and where assets have been scoped into the assessment a proportionate selection of photographs demonstrating the visual relationships between the assets and the surrounding area have been included.
- 7.4 The selected viewpoints therefore support the Heritage Statement by illustrating the relationship between the proposed development, the Site, and the surrounding landscape

context within which heritage assets are experienced. This approach accords with NPPF paragraph 207 and Historic England's GPA3, which emphasise proportionality and relevance, rather than the provision of exhaustive visual coverage, as the basis for informed decision-making.

8 Conclusion

- 8.1 This Technical Note has been prepared by Lanpro Services Limited on behalf of Bretherton Energy Co-Operative and GA Pet Food to respond to heritage-related matters raised during public consultation on application ref. 25/01256/FULMAJ. It clarifies how those matters have been addressed through a proportionate, significance-led Heritage Statement prepared in accordance with statutory duties, the NPPF (2024), Historic England guidance (GPA3), and the adopted policies of both Chorley Council and West Lancashire Borough Council.
- 8.2 The scoping of heritage assets, the assessment of setting, and the use of visual material were all informed by early consultation, professional judgement, and established guidance. Visibility has not been treated as synonymous with harm, and conclusions have been reached by reference to the contribution made by setting to heritage significance, rather than change in isolation.
- 8.3 The Heritage Statement therefore provides a robust and defensible basis for decision-making. It identifies that any effects on the significance of designated heritage assets would be no greater than less than substantial harm, at the lower end of the scale where applicable, and that in many instances no harm would arise at all. In accordance with paragraph 215 of the NPPF, any such harm is capable of being weighed against the public benefits of the scheme, which include the delivery of renewable energy infrastructure and associated environmental and socio-economic benefits.
- 8.4 It is respectfully concluded that the heritage considerations arising from the proposed development have been appropriately identified, assessed, and clearly articulated, and that no additional heritage assessment or visual material is required to enable the Local Planning Authority to reach an informed decision.

