

Hyndburn Local Plan 2040

Council response to Historic England email 23.09.2025

Contents

Hyndburn Borough Council Response	2
Appendix One – Copy of Historic England email dated 23.09.2025.....	3
Appendix Two – Suggested main modifications and Historic England and Hyndburn Borough Council responses	4

Hyndburn Borough Council Response

The following document sets out the Council's response to the email from Historic England dated 23rd September 2025 regarding the lack of a Statement of Common Ground and areas of disagreement around the soundness of the submitted Hyndburn Local Plan. A copy of the Historic England response is set out in appendix 1.

The Council acknowledges Historic England's disappointment in being unable to prepare a Statement of Common Ground for submission for the examination. The Council also regrets that there has been any misunderstanding regarding the resolution of comments made by Historic England.

Historic England are correct that their Regulation 19 comments were submitted in March 2024. The Council does not dispute this and has clearly made reference to this in both the Regulation 22(1)(c) Consultation Statement ([HBC1.007a](#)) and within our Duty to Cooperate Statement of Compliance document ([HBC10.001](#)). The reference to July 2025 in our previous communication related specifically to the SoCG process, not to the timing of Historic England's original representations. This distinction was made in good faith and should not be interpreted as an attempt to dismiss earlier engagement.

Through the Regulation 22(1)(c) statement ([HBC1.007a](#)) you can see the Council's response to Historic England's comments at Regulation 19, highlighting that the Council has acknowledged and considered these comments post Regulation 19 and has made several proposed amendments to the plan.

This also specifically highlights that the Council will work to prepare a Heritage Impact Assessment, which the Council actively prepared in conjunction with Historic England as outlined in the Duty to Cooperate Compliance Statement ([HBC10.001](#)) pages 38 - 40. The Council noted the responses regarding the Local Distinctiveness and policy SP19 but did not state that the Council would be seeking to amend this.

Following the sorting of the Heritage Impact Assessment the Council also prepared a range of proposed modifications to the Local Plan to reflect the role of the HIA and these can be seen in the schedule of proposed amendments to the Hyndburn Local Plan (Document [H010](#)) to further strengthen the HIA's role in policy at the request of Historic England. These documents were published on the 14th May 2025.

The Council has also proposed further amendments to the plan to provide further support to heritage throughout the document, including responses to the vision, strategic objectives, local area policies and site allocations as set out in response to the inspectors Matters, Issues and Questions (MIQs) (published on Friday 29th August) and these are set out in the document in appendix 2, which also includes both Historic England responses to these and the Council's responses to Historic England.

In relation to Historic England's comments on Policy SP19 and local distinctiveness we disagree with the view that Policy SP19 renders the Local Plan unsound. The policy, as drafted and modified, is considered to meet the requirements of the National Planning Policy Framework (NPPF) by setting out a proportionate, strategic-level approach to the historic environment, that is consistent with the proposals in the NPPF. The Local Plan's historic environment policy framework must be read in conjunction with the supporting text, other area specific policies, evidence base and supporting documents, including the site-specific HIAs.

In particular, part 2 of Policy SP19 specifically states "*Particular attention will be paid to the conservation of those elements which contribute most to Hyndburn's distinctive character and sense of place.*". The document then specifically references the local heritage context of Hyndburn in paragraphs 7.54 to 7.61 with particular emphasis being drawn to paragraphs 7.56, 7.58, 7.59 and 7.61.

While we acknowledge Historic England's preference for a more locally detailed narrative within the strategic policy itself, the approach taken is consistent with that adopted by other authorities (examples including the recently adopted Wirral Local Plan (adopted March 2025) and Lewisham Local Plan (adopted July 2025)) and aligns with national policy requirements. We have sought to ensure the policy is consistent with national policy while also providing the local context through the supporting text. While we understand Historic England's disappointment regarding the content of the modifications, we do not accept that the plan as proposed including the main modifications is unsound.

Appendix One – Copy of Historic England email dated 23.09.2025

Hi Thomas,

Historic England is disappointed that the Council did not progress the SoCG. We had, what we understood was a joint understanding, that together we were to try and resolve all matters Historic England have raised including the lack of a locally specific strategy for the historic environment in Hyndburn. The only issue that was resolved was the production of HIAs for the allocated sites.

Reference is made in your email to the 10th July 2025 and our response. The matters raised on the Regulation 19 consultation were indeed made on 18 March 2024 and not 10th July. Reference to this date is in regard to the SoCG only and not new issues. However, we have only just been told in the email on 12 September 2025 that the SoCG was not going to be progressed.

It is disappointing that we have been presented with the Council's related main modifications and have had not had any prior contact by the Council to resolve the comments made by Historic England in March 2024 (apart from the production of HIAs for the allocated sites). We have provided comments on this shared document (see attached).

In relation to Policy SP19, we consider the Local Plan to be unsound, as it does not set out a strategy for the historic environment in Hyndburn. This is not a new issue for the Council. Strategic policies should set out the detail of the historic environment in Hyndburn and what makes it special, not a repeat of national planning policy which could be situated anywhere. This is in accordance with the NPPF and provides a consistent approach that has been repeated across the Country.

Historic England was of the understanding that this matter would be resolved prior to EIP and there would be amendments to Policy SP19 which would deal with this issue. We have supplied examples of such a policy from other adopted Local Plans to the Council and were waiting on the Council's suggestion on proposed changes. Historic England was unaware that the Council had decided not to progress this matter and we have only been notified of this stance via the proposed modification email outlined below.

We have copied the EIP Programme Officer into this email.

Regards,

Emily Hrycan

**Historic Environment Planning Adviser (North)
Development Advice
Historic England**

Appendix Two – Suggested main modifications and Historic England and Hyndburn Borough Council responses

Vision, strategic objectives and area policies main modifications

Policy	Proposed main modification for inspector	Reason for change	Where change is proposed in examination document	Historic England Response	Hyndburn Borough Council Response
Vision	<u>In 2040 Hyndburn will be a vibrant, distinctive, and prosperous area of Pennine Lancashire. It will be recognised for the collective quality and attractiveness of its market towns, its diverse communities, its landscape setting, environmental credentials, including a high quality built and historic environment, a healthy natural environment and its response to climate change, and the special qualities of Huncoat Garden Village.</u>	To strengthen the role of heritage in the plans vision.	MIQ Matter 2, The Vision and Spatial development strategy, Question 2	We support this change.	Comment noted. The Council support this main modification.
Strategic Objective 4	<u>To Conserve and, where appropriate, enhance a valued urban, rural and heritage environment that is ready to address the causes and effects of climate change</u>	To strengthen the role of heritage in the strategic objectives.	MIQ Matter 2, The Vision and Spatial development strategy, Question 3	We object to this change, as it is not in line with the NPPF. The change should refer to 'historic environment' and not 'heritage environment'.	The Council agrees with Historic England's comments. The Council are proposing the following wording as a main modification: <u>To Conserve and, where appropriate, enhance a valued urban, rural and historic environment that is ready to address the causes</u>

					<u>and effects of climate change</u>
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Site Specific proposed main modifications

Policy	Proposed main modification for inspector	Reason for change	Where change is proposed in examination document	Historic England Response	Hyndburn Borough Council Response
Policy EP1: Land to S. Altham Business Park (EMP3)	<u>iv. Preserving the character and setting of the Grade II listed Canal Bridge (Altham Bridge) by implementing the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the significance of heritage assets and their settings.</u>	To ensure that site EMP3 incorporates the recommendations of the HIA to ensure that any impacts are mitigated.	Document H010	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • ‘Preserve’ should read ‘sustain and enhance’. • ‘Character’ does not relate to a listed building. • The change does not reinforce the content of the HIA as it suggests that ‘or other’ suitable mitigation measures may be agreed. • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. • This should be done in addition to the HIA for the site allocation. 	<p>The Council note Historic England’s comments and have the following comments.</p> <p>The Council agree with Historic England’s comments on the use of ‘preserve’ the Council would be happy to include a main modification to amend to ‘sustain and enhance’.</p> <p>The council note Historic England’s comments on ‘character’. The Council propose that this could be amended to ‘significance’ to reflect wording in the NPPF.</p>

					<p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an application. The wording '<i>or other or other suitable mitigation measures agreed by the Council</i>' allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures as they are not included in the HIA.</p> <p>The fourth bullet point from Historic England seems to be</p>
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					<p>inconsistent with their response in bullet point three. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning applications. This is why the clause <i>'or other or other suitable mitigation measures agreed by the Council'</i> has been included. The Council, by definition, has to give approval to the measures as otherwise no planning permission can be approved.</p> <p>The Council therefore consider this sound.</p>
<p>Policy EP2: Land between Blackburn Rd and M65 Slipway (EMP4)</p>	<p><u>iv. Preserving the character and setting of the two Grade II listed buildings (Whitebirk Moss Farm and Whitebirk North Cottage) opposite the site by implementing the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the</u></p>		<p>Document H010</p>	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • 'Preserve' should read 'sustain and enhance'. • 'Character' does not relate to a listed building. 	<p>The Council note Historic England's comments and have the following comments.</p> <p>The Council agree with Historic England's comments on the use of 'preserve' the Council would be happy to include a main</p>

	<p><u>significance of heritage assets and their settings.</u></p>			<ul style="list-style-type: none"> • The change does not reinforce the content of the HIA as it suggests that 'or other' suitable mitigation measures may be agreed. • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. • This should be done in addition to the HIA for the site allocation. 	<p>modification to amend to 'sustain and enhance'.</p> <p>The council note Historic England's comments on 'character'. The Council propose that this could be amended to 'significance' to reflect wording in the NPPF.</p> <p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an application. The wording '<i>or other or other suitable mitigation measures agreed by the Council</i>' allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning application process which includes the outcomes of the heritage</p>
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					<p>statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures as they are not included in the HIA.</p> <p>The fourth bullet point from Historic England seems to be inconsistent with their response in bullet point three. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning applications. This is why the clause <i>'or other or other suitable mitigation measures agreed by the Council'</i> has been included. The Council, by definition, has to give approval to the measures as otherwise no planning permission can be approved.</p>
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					The Council therefore consider this sound.
Policy EP3: Land between Blackburn Rd, Sidebeet Lane, Leeds & Liverpool Canal and railway (EMP5)	<u>lv. Preserving the character and setting of the Grade II listed buildings in the vicinity of the site: Whitebirk Moss Farm, Whitebirk North Cottage (and consideration of the impact on the curtilage of these buildings), Canal Bridge No. 106 Side Beet Bridge and Higher Side Beet Farmhouse by implementing the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the significance of heritage assets and their settings.</u>		Document H010	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • ‘Preserve’ should read ‘sustain and enhance’. • ‘Character’ does not relate to a listed building. • Remove ‘vicinity’ reference. • The change does not reinforce the content of the HIA as it suggests that ‘or other’ suitable mitigation measures may be agreed. • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. This should be done in addition to the HIA for the site allocation. 	<p>The Council note Historic England’s comments and have the following comments.</p> <p>The Council agree with Historic England’s comments on the use of ‘preserve’ the Council would be happy to include a main modification to amend to ‘sustain and enhance’.</p> <p>The council note Historic England’s comments on ‘character’. The Council propose that this could be amended to ‘significance’ to reflect wording in the NPPF.</p> <p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an</p>

					<p>application. The wording '<i>or other or other suitable mitigation measures agreed by the Council</i>' allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures as they are not included in the HIA.</p> <p>The fourth bullet point from Historic England seems to be inconsistent with their response in bullet point three. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning</p>
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					<p>applications. This is why the clause '<i>or other or other suitable mitigation measures agreed by the Council</i>' has been included. The Council, by definition, has to give approval to the measures as otherwise no planning permission can be approved.</p> <p>The Council therefore consider this sound.</p>
<p>Policy EP4: Land north of railway line between Sidebeet Lane and Leeds & Liverpool Canal (EMP6)</p>	<p><u>iv. Preserving the character and setting of the Grade II listed buildings in the vicinity of the site: Whitebirk Moss Farm, Whitebirk North Cottage (and consideration of the impact on the curtilage of these buildings), Canal Bridge No. 106 Side Beet Bridge and Higher Side Beet Farmhouse by implementing the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the significance of heritage assets and their settings.</u></p>		<p>Document H010</p>	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • 'Preserve' should read 'sustain and enhance'. • 'Character' does not relate to a listed building. • Remove 'vicinity' reference. • The change does not reinforce the content of the HIA as it suggests that 'or other' suitable mitigation measures may be agreed. • It is the role of a heritage statement 	<p>The Council note Historic England's comments and have the following comments.</p> <p>The Council agree with Historic England's comments on the use of 'preserve' the Council would be happy to include a main modification to amend to 'sustain and enhance'.</p> <p>The council note Historic England's comments on 'character'. The Council propose that this could be</p>

				<p>with a LBC/PP which should inform mitigation measures, not the Council. This should be done in addition to the HIA for the site allocation.</p>	<p>amended to 'significance' to reflect wording in the NPPF.</p> <p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an application. The wording '<i>or other or other suitable mitigation measures agreed by the Council</i>' allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures as they are not included in the HIA.</p>
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					<p>The fourth bullet point from Historic England seems to be inconsistent with their response in bullet point three. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning applications. This is why the clause <i>'or other or other suitable mitigation measures agreed by the Council'</i> has been included. The Council, by definition, has to give approval to the measures as otherwise no planning permission can be approved.</p> <p>The Council therefore consider this sound.</p>
<p>Policy HP6: Land S. of Moorfield Ave., Huncoat (H15)</p>	<p><u>vii. Development will need to preserve the character and setting of the Grade II listed building to the east of the site (Huncoat Hall and attached barn) by implementing the recommendations of the Heritage Impact Assessment prepared in support of the Local</u></p>		<p>Document H010</p>	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • 'Preserve' should read 'sustain and enhance'. 	<p>The Council note Historic England's comments and have the following comments.</p> <p>The Council agree with Historic England's comments</p>

	<p><u>Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the significance of heritage assets and their settings.</u></p>			<ul style="list-style-type: none"> • ‘Character’ does not relate to a listed building. • The change does not reinforce the content of the HIA as it suggests that ‘or other’ suitable mitigation measures may be agreed. • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. This should be done in addition to the HIA for the site allocation. 	<p>on the use of ‘preserve’ the Council would be happy to include a main modification to amend to ‘sustain and enhance’.</p> <p>The council note Historic England’s comments on ‘character’. The Council propose that this could be amended to ‘significance’ to reflect wording in the NPPF.</p> <p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an application. The wording ‘<i>or other or other suitable mitigation measures agreed by the Council</i>’ allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the</p>
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					<p>planning application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures as they are not included in the HIA.</p> <p>The fourth bullet point from Historic England seems to be inconsistent with their response in bullet point three. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning applications. This is why the clause '<i>or other or other suitable mitigation measures agreed by the Council</i>' has been included. The Council, by definition, has to give approval to the measures as otherwise no planning</p>
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					permission can be approved. The Council therefore consider this sound.
Policy HP10: Land to the northeast of Cut Lane (H20)	<u>xiii. Development proposals should implement the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the significance of heritage assets and their settings.</u>		Document H010	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • The change does not reinforce the content of the HIA as it suggests that 'or other' suitable mitigation measures may be agreed. • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. This should be done in addition to the HIA for the site allocation. 	<p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an application. The wording '<i>or other or other suitable mitigation measures agreed by the Council</i>' allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures</p>

					<p>as they are not included in the HIA.</p> <p>The second bullet point from Historic England seems to be inconsistent with their response in bullet point one. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning applications. This is why the clause '<i>or other or other suitable mitigation measures agreed by the Council</i>' has been included. The Council, by definition, has to give approval to the measures as otherwise no planning permission can be approved.</p> <p>The Council therefore consider this sound.</p>
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Area wide policies proposed main modifications

Policy	Proposed main modification for inspector	Reason for change	Where change is proposed in examination document	Historic England response	Hyndburn Borough Council response
Policy SP2 Huncoat Garden Village	<u>Development proposals should implement the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the significance of heritage assets and their settings.</u>	<p>To ensure that allocated sites in the Huncoat Garden Village incorporate the recommendations of the HIA to ensure that any impacts are mitigated.</p> <p>Sites covered by the policy include: H11 Former Huncoat Colliery, Enfield Road H12 Huncoat East Strategic Site (north) H13 Huncoat East Strategic Site (south) H14 Land west of A56 / north of Burnley Road H15 Land south east of Moorfield Avenue</p>	Document H010	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • The change does not reinforce the content of the HIA as it suggests that 'or other' suitable mitigation measures may be agreed. • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. This should be done in addition to the HIA for the site allocation. 	<p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an application. The wording 'or other or other suitable mitigation measures agreed by the Council' allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures</p>

					<p>as they are not included in the HIA.</p> <p>The second bullet point from Historic England seems to be inconsistent with their response in bullet point one. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning applications. This is why the clause 'or other or other suitable mitigation measures agreed by the Council' has been included. The Council, by definition, has to give approval to the measures as otherwise no planning permission can be approved.</p> <p>The Council therefore consider this sound.</p>
<p>Policy SP30: Oswaldtwistle and Knudzen</p>	<p><u>Development proposals should implement the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or</u></p>	<p>To ensure that all sites referenced in Policy SP30 incorporate the recommendations of the HIA to ensure that any impacts are mitigated.</p>	<p>Document H010</p>	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • The change does not reinforce the content of 	<p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting</p>

	<p><u>minimise harm to the significance of heritage assets and their settings.</u></p>	<p>Sites covered by this policy include: H16 Land south of Stanhill Road, Knuzden H17 Land off Brookside Lane / Nook Lane, Oswaldtwistle</p> <p>H18 Land south of Rhyddings Street and north of Stonebridge Lane</p> <p>H19 Land off Rhoden Road / Roe Greave Road</p>		<p>the HIA as it suggests that 'or other' suitable mitigation measures may be agreed.</p> <ul style="list-style-type: none"> • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. This should be done in addition to the HIA for the site allocation. 	<p>point for the applicant when submitting an application. The wording 'or other or other suitable mitigation measures agreed by the Council' allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures as they are not included in the HIA.</p> <p>The second bullet point from Historic England seems to be inconsistent with their response in bullet point one. The Council agree that the heritage statement should inform mitigation measures and this would be required for</p>
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					<p>all relevant planning applications. This is why the clause ‘or other or other suitable mitigation measures agreed by the Council’ has been included. The Council, by definition, has to give approval to the measures as otherwise no planning permission can be approved.</p> <p>The Council therefore consider this sound.</p>
<p>Policy SP26: Accrington</p>	<p><u>Proposed amendment to Policy:</u></p> <p><u>Developments within Accrington are expected to be of distinctive quality and design and should preserve and enhance the special character and/or appearance of the conservation areas, listed buildings and their settings, areas containing or in proximity to a heritage asset (including non-designated heritage assets), and areas of high visual amenity.</u></p> <p><u>Proposed amendment to supporting text:</u></p>	<p>Proposed main modifications to strengthen role of heritage in Accrington area and identify heritage features including conservation areas.</p>	<p>MIQ Matter 2, The Local Plan Areas, Question 1</p>	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • The change proposes to list the type of heritage assets that may be affected with any proposal. It is important that the impact of any change is worded in the correct way. To avoid confusion, it would be best for the policy to refer to designated and non-designated heritage assets and their setting. 	<p>The Council notes historic England’s comments around the proposed policy wording the Council propose the following main modification:</p> <p><i>‘Developments within Accrington are expected to be of distinctive quality and design and should preserve and enhance the special character, significance and/or appearance of the Conservation Areas, designated and non-designated heritage assets and their settings.’</i></p>

	<p><u>10.10 The area features three designated conservation areas (Accrington Central Conservation Area; Church Canal Side Conservation Area; and Christ Church Conservation Area), Listed Buildings and non-designated heritage assets, providing a built heritage context that will influence future development proposals. Development proposals are expected to be accompanied by an appropriate evidence-based assessment of the heritage context to ensure that the impact of the proposals are clearly understood</u></p>			<ul style="list-style-type: none"> • Whether a proposal affects a heritage asset is determined by harm to its significance. This is not determined by whether a site contains or is in proximity to. • What is the reference to 'high visual amenity' mean. • Reference to 'designated' with reference to conservation areas, should be removed. • Rather than listed buildings and non-designated heritage assets (10.10), this should refer to heritage assets and their setting. • Whilst we support reference to evidence to support proposals, it incorrectly refers to 'heritage context'. 	<p>The Council note historic England's comments around the proposed supporting text wording the Council propose the following main modification:</p> <p><i>'The area features three designated conservation areas (Accrington Central Conservation Area; Church Canal Side Conservation Area; and Christ Church Conservation Area), designated and non-designated heritage assets and their settings, providing a built heritage context that will influence future development proposals. Development proposals are expected to be accompanied by an appropriate evidence-based assessment of the historic context to ensure that the impact of the proposals are clearly understood.'</i></p>
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<p>Policy SP27: Clayton-le-Moors and Altham</p>	<p><u>Development proposals should implement the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the significance of heritage assets and their settings.</u></p>	<p>To ensure that all sites referenced in Policy SP27 incorporate the recommendations of the HIA to ensure that any impacts are mitigated.</p> <p>Sites covered by this policy include:</p> <p>H8 Lower Barnes Street</p> <p>H9 Ringstonhalgh Farm</p> <p>H10 Clayton Triangle</p> <p>EMP1 Land west of J7 Business Park, Clayton-le-Moors and Altham</p>	<p>Document H010</p>	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • The change does not reinforce the content of the HIA as it suggests that ‘or other’ suitable mitigation measures may be agreed. • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. This should be done in addition to the HIA for the site allocation. 	<p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an application. The wording ‘or other or other suitable mitigation measures agreed by the Council’ allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures as they are not included in the HIA.</p> <p>The second bullet point from Historic England seems to be</p>
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					<p>inconsistent with their response in bullet point one. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning applications. This is why the clause ‘or other or other suitable mitigation measures agreed by the Council’ has been included. The Council, by definition, has to give approval to the measures as otherwise no planning permission can be approved.</p> <p>The Council therefore consider this sound.</p>
<p>Policy SP28: Great Harwood</p>	<p><u>Proposed amendment to policy:</u></p> <p><u>Developments within Great Harwood are expected to be of distinctive quality and design and should preserve and enhance the special character and/or appearance of the Great Harwood Conservation Area, listed buildings and their settings, areas containing or in proximity to a heritage asset</u></p>	<p>Proposed main modifications to strengthen role of heritage in Great Harwood area and identify heritage features including conservation areas.</p>	<p>MIQ Matter 2, The Local Plan Areas, Question 2</p>	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • The change proposes to list the type of heritage assets that may be affected with any proposal. It is important that the impact of any change is worded in the 	<p>The Council notes historic England’s comments around the proposed policy wording the Council propose the following main modification:</p> <p><i>‘Developments within Great Harwood are expected to be of distinctive quality and design and should preserve and enhance</i></p>

	<p><u>(including non-designated heritage assets), and areas of high visual amenity.</u></p> <p><u>Proposed amendment to supporting text:</u></p> <p><u>Great Harwood is a town with an industrial heritage, containing a large number of historic landmarks and listed buildings evidencing the history of the town's cotton industry, and the Great Harwood Town Centre conservation Area. As such, account should be taken of the special architectural or historic interest of the Conservation Area, listed building and non-designated heritage assets, the character or appearance of which it is desirable to preserve or enhance. The relevant Conservation Area Appraisal identifies the opportunities for beneficial change or the needs for planning protection. Development proposals are expected to be accompanied by appropriate evidence-based assessment of the heritage context to ensure that impact of the proposals are clearly understood.</u></p>			<p>correct way. To avoid confusion, it would be best for the policy to refer to designated and non-designated heritage assets and their setting.</p> <ul style="list-style-type: none"> • Whether a proposal affects a heritage asset is determined by harm to its significance. This is not determined by whether a site contains or is in proximity to. • Rather than conservation areas, listed buildings etc being specifically mentioned in the supporting text, this should refer to heritage assets and their setting. • Reference should also be corrected, as listed buildings are not treated the same as conservations areas for example. • Whilst we support reference to evidence to support proposals, it incorrectly refers to 'heritage context'. 	<p><i>the special character, significance and/or appearance of the Great Harwood Conservation Area, designated and non-designated heritage assets and their settings.'</i></p> <p>The Council note historic England's comments around the proposed supporting text wording the Council propose the following main modification:</p> <p><i>'Great Harwood is a town with an industrial heritage, containing a large number of historic landmarks and listed buildings evidencing the history of the town's cotton industry, and the Great Harwood Town Centre conservation Area. As such, account should be taken of the special architectural or historic interest of the Conservation Area, heritage and non-designated heritage assets and their settings. The relevant</i></p>
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					<p><i>Conservation Area Appraisal identifies the opportunities for beneficial change or the needs for planning protection. Development proposals are expected to be accompanied by appropriate evidence-based assessment of the historic context to ensure that impact of the proposals are clearly understood.'</i></p>
<p>Policy SP31: Rishton and Whitebirk</p>	<p><u>Development proposals should implement the recommendations of the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed by the Council, to avoid or minimise harm to the significance of heritage assets and their settings.</u></p>	<p>To ensure that all sites referenced in Policy SP31 incorporate the recommendations of the HIA to ensure that any impacts are mitigated.</p> <p>Sites covered by this policy include: H20 Land to the north east of Cut Lane H21 York Mill, Livesey Street H22 Land off Fielding Street and Barn Meadow Crescent</p>	<p>Council will request this main modification in the examination.</p>	<p>We object to this change, which is not in line with the NPPF nor safeguards heritage assets and their setting:</p> <ul style="list-style-type: none"> • The change does not reinforce the content of the HIA as it suggests that 'or other' suitable mitigation measures may be agreed. • It is the role of a heritage statement with a LBC/PP which should inform mitigation measures, not the Council. This should be done in addition to the HIA for the site allocation. 	<p>The Council disagree with Historic England on the proposed change not reinforcing the content of the HIA. The wording as proposed reinforces the HIA as a starting point for the applicant when submitting an application. The wording 'or other or other suitable mitigation measures agreed by the Council' allows the opportunity for other mitigation measures to be suggested by the applicant to the council through the planning</p>

					<p>application process which includes the outcomes of the heritage statement submitted with the LBC/planning application. The Council could not logically have a policy that does not allow otherwise compliant mitigation measures as they are not included in the HIA.</p> <p>The second bullet point from Historic England seems to be inconsistent with their response in bullet point one. The Council agree that the heritage statement should inform mitigation measures and this would be required for all relevant planning applications. This is why the clause 'or other or other suitable mitigation measures agreed by the Council' has been included. The Council, by definition, has to give approval to the measures as otherwise no planning</p>
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					<p>permission can be approved.</p> <p>The Council therefore consider this sound.</p>
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Sites with no reference to heritage Impact Assessment due to no or negligible harm being identified

1. Policy HP1 Land at Charter Street (H2)
2. Policy HP2 Land at Hopwood Street (H4)
3. Policy HP3 Land North of Sandy Lane (H7)
4. Pendle Street (H3)