

By Email: [planningpolicy@hyndburnbc.gov.uk](mailto:planningpolicy@hyndburnbc.gov.uk)

Our ref: PL00799111

Your ref:

Date: 14 April 2026

Dear Local Plan Team

### **Proposed Modifications to the Hyndburn Local Plan and Sustainability Appraisal**

Thank you for consulting Historic England on the above document.

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.

We have the following comments to make:

#### **Main Modifications**

<b>Reference</b>	<b>Comment</b>
MM02	Historic England supports this change.
MM03	Historic England supports this change.
MM09	Historic England supports this change.
MM31	Historic England supports this change.
MM54	Historic England supports this change.
MM55	Historic England objects to the proposed change.  Removal of any reference to non-designated heritage assets, results in the Heritage Policy SP19 (and the Plan) being silent on any matters relating to these assets. As a result, there is no policy guidance which helps with an application and supports other policies on sites where this is mentioned. In addition, there is no change which would make this policy, locally specific to Hyndburn. This would not be in accordance with the NPPF.
MM57	Historic England objects to the proposed change.  Conservation areas should have their character and appearance preserved and enhanced, especially those elements that make a positive contribution to their significance. <i>'Statutory listed buildings'</i> infers that there are also 'non-statutory' ones. This needs to be corrected in line with the NPPF and use heritage assets. <i>'Locally listed buildings'</i> reference is inconsistent in terms of terminology and the NPPF uses 'non-designated heritage assets'. Whilst we welcome a correct inclusion, removal of reference to this in the Heritage Policy (SP19), would not provide any guidance to support this inclusion.

	<p><u>Proposed change:</u> Promote opportunities to sustain and enhance the <del>conserve and enhance the character and appearance of the Church Canalside Conservation Area, statutory listed buildings and locally listed buildings</del> <b>and sustain and enhance heritage assets and their setting (including designated and non-designated).</b></p> <p><b>Insert locally specific references to Hyndburn within Policy SP19.</b></p>
MM58	<p>Historic England objects to the proposed change.</p> <p>It only seeks to conserve and not enhance, the inclusion of the latter would be in accordance with the NPPF.</p> <p><u>Proposed change:</u> last word to read: ‘should be paid to their conservation <b>and enhancement</b>’.</p>
MM64	<p>Historic England objects to the proposed change.</p> <p>Whilst reference to conservation areas is correct, the rest of the insertion is incorrect with the requirements of the NPPF and national policy:</p> <p><i>‘listed buildings and their setting’</i> are not subject to the same requirements as that of a conservation area and should not be listed as so. They should be sustained and enhanced and refer to heritage asset not listed building to ensure all are covered.</p> <p><i>‘areas containing or in proximity to a heritage asset’</i> - this has already been stated in terms of reference above, yet it is incorrectly repeated here. Setting is also covered. This is not a separate issue and is incorrect with the requirements of the NPPF and national policy.</p> <p><i>(non-designated heritage assets)</i> - this can be referred to in the reference to heritage assets.</p> <p><i>‘areas of high visual amenity’</i> - what does this mean – this is not relevant to heritage and should be removed.</p> <p><u>Proposed change:</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, <b>and sustain and enhance heritage assets and 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.</b></p>
MM66	<p>Historic England objects to the proposed change.</p> <p>The inserted text makes reference to ‘heritage context’ which is incorrect, and should be replaced with ‘historic environment’ this would make it more in line with the NPPF and national legislation. In addition, any proposals affecting the historic environment should be accompanied by an assessment rather than ‘are expected’.</p> <p><u>Proposed change:</u> Development proposals are expected to <b>should</b> be accompanied by an appropriate evidence-based assessment of the <del>heritage context</del> <b>historic environment</b> to ensure that the impact of the proposals are clearly understood.</p>
MM68	Historic England supports this change.
MM72	<p>Historic England objects to the proposed change.</p> <p>Whilst reference to conservation areas is correct, the rest of the insertion is incorrect with the requirements of the NPPF and national policy:</p>

	<p><i>'listed buildings and their setting'</i> are not subject to the same requirements as that of a conservation area and should not be listed as so. They should be sustained and enhanced and refer to heritage asset not listed building to ensure all are covered.</p> <p><i>'areas containing or in proximity to a heritage asset'</i> - this has already been stated in terms of reference above, yet it is incorrectly repeated here. Setting is also covered. This is not a separate issue and is incorrect with the requirements of the NPPF and national policy.</p> <p><i>(non-designated heritage assets)</i> - this can be referenced in the reference to heritage assets.</p> <p><i>'areas of high visual amenity'</i> - what does this mean – this is not relevant to heritage and should be removed.</p> <p><u>Proposed change:</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 conservation areas, <b>and sustain and enhance heritage assets and 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.</b></p>
MM73	<p>Historic England objects to the proposed change.</p> <p>It provides inconsistency in terms of reference – e.g. listed buildings and heritage assets and seeks to preserve and enhance their character and appearance. In addition, any proposals affecting the historic environment should be accompanied by an assessment rather than 'are expected'. The proposed changes will bring it in line with the NPPF.</p> <p><u>Proposed change:</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, <b>and sustain and enhance its heritage assets and their setting, listed building and non-designated heritage assets, the character or appearance of which it is desirable to preserve or enhance.</b> The relevant Conservation Area Appraisal <b>and Management Plan,</b> identifies the opportunities for beneficial change or the needs for planning protection. Development proposals <del>are expected to</del> <b>should</b> be accompanied by appropriate evidence-based assessment of the <del>heritage context</del> <b>historic environment</b> to ensure that impact of the proposals are clearly understood.</p>
MM76	Historic England supports this change.
MM77	Historic England supports this change.
MM82	Historic England supports this change.
MM93	Historic England supports this change.
MM99	<p>Historic England objects to this change.</p> <p>It seeks to remove the setting of the designated heritage assets to be considered in any development proposal and this is contrary to the NPPF.</p> <p><u>Proposed change:</u> Sustain and enhance <del>the Preserving the significance setting of the</del> Grade II listed buildings <b>and their setting</b> 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.</p>
MM110	Historic England objects to this change.

	<p>It seeks to remove the setting of the designated heritage assets to be considered in any development proposal and this is contrary to the NPPF.</p> <p><u>Proposed change:</u> Sustain and enhance <del>the Preserving the <b>significance</b> setting of the</del> Grade II listed buildings <b>and their setting</b> 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.</p>
MM123	Historic England supports this change.
MM125	<p>Historic England objects to the proposed change.</p> <p>It seeks to delete guidance for the redevelopment of the site and thus safeguarding heritage assets and their setting. The deleted text incorrectly refers to elements of the historic environment, should it be included then references need to be corrected. This would all be in line with the NPPF.</p>
MM126	<p>Historic England does not support this change.</p> <p>It does not make amendments to the reference to the Grade II listed heritage asset by keeping in reference to 'preserve the character and setting'. This would not be in line with the NPPF.</p> <p><u>Proposed change:</u> vii. Development will need to <del>preserve the character and</del> <b>sustain and enhance the</b> setting of the Grade II listed building to the east of the site (Huncoat Hall and attached barn), <b>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.</b></p>
MM127	Historic England supports this change.
MM131	Historic England supports this change.
MM137	Historic England supports this change.
MM139	Historic England supports this change.
MM144	Historic England supports this change.
MM145	Historic England supports this change.

### **Additional Modifications**

Historic England has no comments to make.

### **Sustainability of Main Modifications**

<b>Reference</b>	<b>Comment</b>
MM55	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a significant negative effect on SA objective 11.
MM57	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a significant negative effect on SA objective 11.
MM58	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a significant negative effect on SA objective 11.
MM64	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a significant negative effect on SA objective 11.

MM66	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a minor negative effect on SA objective 11.
MM72	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a significant negative effect on SA objective 11.
MM73	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a significant negative effect on SA objective 11.
MM99	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a minor negative effect on SA objective 11.
MM110	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a minor negative effect on SA objective 11.
MM125	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a significant negative effect on SA objective 11.
MM126	We disagree with the proposed SA score. In view of our comments the proposed main modification will have a significant negative effect on SA objective 11.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



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