



Historic England

By email: CentralLancashirePlan@chorley.gov.uk

Our ref: PL00791328

Your ref:

Date: 9 April 2025

Dear Central Lancashire Local Plan Team

Central Lancashire Local Plan (CLLP)– Publication

Thank you for consulting Historic England on the above. This response details Historic England's response to the Local Plan for Central Lancashire and the historic environment.

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 (<http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) may be useful in the production of your Plan.

The Local Plan for Central Lancashire 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 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.

The table attached to this letter provides detailed comments on the Plan's sections and policies. To summarise, our response is as follows:

Historic Environment Policy: The policy is not locally specific to the Plan area and does not set out its priorities. It lacks clarity on its application including different heritage asset types.

Other Policies: This includes lack of mention of the historic environment and heritage assets or incorrectly referenced such as only seeking to conserve and not enhance, for example.

Site Allocations: Although the Council have undertaken a series of HIAs (Heritage Impact Assessments) for the site allocations, which is supported by Historic England. The findings



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have not been incorporated within the Plan. Reference needs to be made to the actual document produced not the need for one.

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

Yours sincerely

E. Hrycan

Emily Hrycan
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Historic England
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Page	Policy/ Para	Sound/ Unsound	Comments	Suggested amendments
13	Para 2.4	Sound	Historic England supports this section. We welcome the intention that the vision for the area is 'founded on a good understanding of the characteristics of Central Lancashire and the key challenges, needs and opportunities facing the area.	None
13/14	Place Profiles 2.5, 2.6, 2.7	Sound	Historic England supports this section.	None
15	2.8 – 2.18	Unsound	The section on Economic, Social and Environmental Challenges and Opportunities fails to mention the historic environment. It mentions the natural environment amongst others for example. The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in Central Lancashire's attractiveness for business, tourism and as a place to live. Any overarching section for area, such as this, should include reference to the historic environment. The historic environment will feature in this area in different ways. This would then ensure that not only does it feature in any proposals for this area but also matches other areas of the Local Plan. Therefore, within this part of the Plan, Historic England would welcome the inclusion of reference to the historic environment. This	Introduce reference to the 'historic environment' within this section of the Plan.



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			would ensure that there is a positive strategy for the historic environment in line with the requirements of the NPPF.	
19	Spatial vision	Unsound	<p>We welcome the inclusion of heritage within the proposed spatial vision for Central Lancashire. It is positive that the role cultural heritage can play in the economy and environment is also recognised.</p> <p>However, the vision only seeks to ‘conserve’ heritage assets. It is important that it seeks to ‘enhance’ them as well, in line with the requirements of the NPPF and legislation.</p>	<p>The text be amended to read:</p> <p>Our heritage assets historic and natural environment will be conserved and enhanced our natural environment will be protected and enhanced for its intrinsic value whilst providing opportunities for enjoyment, recreation and leisure.“</p>
21	Strategic Objective 6	Sound	Historic England supports Strategic Objective 6.	None
21	Strategic Objective 7	Sound	Historic England supports Strategic Objective 7.	None
27	Strategic Objective 8	Sound	Historic England supports Strategic Objective 8.	None
23	Policy SS1: Development Patterns	Sound	We welcome this policy which positively protects and enhances the historic environment, an important component of the drive to achieve sustainable development in the NPPF.	None
26	3.16 Bullet 6	Sound subject to a textual amendment	Rather than ‘maintain and enhance’ in reference to the historic environment it should be ‘conserve and enhance’ in line with the NPPF.	<p>The text be amended to read:</p> <p>“Maintain Conserve and enhance the natural and historic environment....”</p>



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29	Policy SS3 Bullet 3g	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p>	<p>The text of Bullet 3g be amended to read:</p> <p>“The development should fully recognise the significance of the site’s heritage assets in a manner appropriate to their significance, <u>in accordance with the Council’s HIA as a minimum.</u>”</p>
33	Policy Heritage assets and archaeology (EN13)	Unsound	<p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p>	<p>The text of Policy EN13 for the site should be amended to read:</p> <p>“A <u>In accordance with the HIA which</u> has been completed to support allocation of the site. Development of the site will require an <u>updated</u> HIA to inform any development criteria that may be required to mitigate harm <u>or enhance heritage assets</u> resulting from development.</p>



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			Therefore, within this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.	
34	Policy Strategic Allocation Fulwood Barracks Bullet 1	SS4: Site – Sound subject to a textual change	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p>	Text Bullet 1 should be amended to read: “...car parking, and areas of open land including playing fields and <u>where the Battle of Preston occurred</u> an Ancient Battlefield ”.
	Bullet 3	Unsound	As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.	Bullet 3 should be amended to read: “Any application on the site must be supported by <u>an updated HIA (taking into account the content of the Council's HIA for the site), a detailed masterplan and design code all of which takes into account for the heritage assets value of affected by the site.</u> ”



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			<p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, as well as textual changes, which would be in line with the requirements of the NPPF.</p> <p>The suggested change to Bullet 1 is to match its status, as it is not considered an Ancient Battlefield.</p>	
35	Policy Well-designed places (EN1)	Unsound	<p>See text on Policy 334 (in which this sits) above.</p> <p>The text in this section of the Local Plan refers to the HIA – this would be better placed in the consideration on heritage assets and archaeology (page 37).</p>	<p>The text should be amended to read:</p> <p>“A detailed Heritage Impact Assessment has been prepared to support the allocation. Given the significant assets on site, a design code and masterplan is required as part of the Masterplanning.</p> <p>Development of the Barracks and existing open space on site should include an assessment of the contribution of the open land to the east. The existing open space reflects the original setting of the Barracks when it was built. Building on this area therefore needs to be assessed through the planning</p>



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				application as it will mean the Barracks will be enclosed on all sides. This can be positive if designed appropriately. The actual design and density of housing may also will reflect the actual number of housing units considered acceptable on site. Good design could increase will influence the number of units considered acceptable.
37	Heritage assets and Archaeology (EN13)	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. It is important that the content of this HIA and its</p>	<p>The text should be amended to read:</p> <p>The site contains numerous listed buildings and the site is within the Fulwood Conservation Area. A detailed HIA has been completed on the site, by the Council and its content will be required to inform - Sympathetic redevelopment of the site will be required. Any planning application and listed building consent application to develop the site will need to be accompanied by an Archaeological Desk Based Assessment and/or the results of an archaeological field evaluation and a detailed Heritage Impact Assessment. The development will</p>



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			<p>requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	likely require a level of archaeological mitigation.
38	Policy SS3: Strategic Site Allocation – Preston West Bullet 4J	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p>	<p>The text should be amended to read:</p> <p>“The development should fully recognise the significance of the site’s heritage assets in a manner appropriate to their significance, <u>in accordance with the Council’s HIA as a minimum.</u>”</p>



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			<p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	
42	Heritage Assets and Archaeology (EN13)	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the</p>	<p>The text should be amended to read:</p> <p>“Any planning application to develop the site will need to be accompanied by an Archaeological Desk Based Assessment and/or the results of an archaeological field evaluation. The development will likely require a level of archaeological mitigation.</p> <p>The site contains a number of heritage assets. including:</p>



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			<p>Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>The suggested change to the text is to match the other site allocations which do not list the heritage assets affected.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, as well as textual changes, which would be in line with the requirements of the NPPF.</p>	<p>Leyland Bridge Farmhouse—A Grade II listed Building Canal Bridge Number 28—A Grade II public road bridge Canal Bridge Number 19 Quaker's Bridge—A Grade II public road bridge Clock House—A Grade II listed Building</p> <p>Development of the site will require a <u>detailed</u> HIA to inform any development criteria that may be required to <u>and to inform any mitigation/enhancement measures needed</u> harm resulting from <u>as part of the</u> development.</p> <p><u>A Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u></p>
56	Policy HS2: Housing Allocation Chorley	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should</p>	<p>Insert reference to the Council's HIA:</p> <p><u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u></p>



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			<p>be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies contained in Appendix 4 (where relevant). It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within Appendix 4 of this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	



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58	Policy HS3: Housing Allocations South Ribble	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies contained in Appendix 4 (where relevant). It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p>	<p>Insert reference to the Council's HIA:</p> <p><u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u></p>



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			<p>Therefore, within Appendix 4 of this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	
60	Policy HS4: Housing Allocations Preston	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies contained in Appendix 4 (where relevant). It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p>	<p>Insert reference to the Council's HIA:</p> <p><u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u></p>



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			<p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within Appendix 4 of this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	
67	<p>Policy HS6: Housing Mix and Density</p> <p>Bullet 3b</p> <p>Bullet 4</p>	Unsound	<p>Historic England recognises that the provision of more homes across England is a Government priority with increasing residential density of development identified in the various policies and agenda papers, as a key way of meeting growing housing need.</p> <p>In light of this, it is important that the impact of such proposals, have a positive relationship between any new development and the existing character of a place and the historic environment. Indeed, the NPPF requires that providing more homes is more about just providing a greater quantity of homes it is also about quality and the need to understand and reflect local conditions. The NPPF also requires planning policies and decisions to address the connections between people and places and the integration of new development into the natural, built and historic environment.</p> <p>The Policy and the supporting text needs to provide a more balanced approach to new housing density and provides emphasis on setting minimum requirements. As drafted it does not mention the impact on heritage assets. It also suggests that lower densities will be permitted where it can be demonstrated that it would cause harm to</p>	<p>The text should be amended on Bullet 3b to read:</p> <p>“There is no detrimental impact harm on the amenity, character, appearance, distinctiveness, heritage assets and environmental quality of the surrounding area.”</p> <p>Bullet 4 should be amended to read:</p> <p>“Lower densities will only be permitted be required where it can be demonstrated that: a) The minimum density would cause harm to the character or appearance of an area, including heritage assets; and/or b) There are site specific constraints that reduce the developable area of the site; and/or</p>



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			<p>an area. Development normally requires maximising development of a site. The lower density need is a requirement where it demonstrates the harm rather than <i>permitted if it can justify</i>. This would provide the LPA with comfort that they can request a lower density where there is any harm caused. There is suggested amendment to the text which demonstrates this change.</p> <p>As drafted it appears to suggest that these development densities are set and that any amendments would need clear justification and not compromise the overall delivery of homes in instances such as the character and appearance of an area and not the historic environment. Whilst the area has been divided up into typologies, this will not assist on a site which is within a conservation area or affecting the setting of a heritage asset, for example</p> <p>The policy as drafted contradicts the requirements of the NPPF in which the starting point of any new development should be its location and what the local natural, built and historic environment is like including the setting of heritage assets further afield. This ensures that the density on the site will be appropriate and enhances its context – variations in density may be required in order to mitigate harm to heritage asset for example or to relate to local character.</p>	c) There are local housing market issues that affect the type of housing to be provided or affect the site's viability”
70	4.52	Unsound	See comments above on reference to density.	Any amendments to the Policy should be reflected in the supporting text.
75	Policy HS8: Rural Exception Sites	Unsound	The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as	Policy 1c should read: “The scale and nature of the



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			<p>well. Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in Central Lancashire’s attractiveness for business, tourism and as a place to live.</p> <p>This policy should include reference to the historic environment. The historic environment will feature in this area in different ways. This would then ensure that not only does it feature in any proposals for this area but also matches other areas of the Local Plan.</p> <p>Therefore, within this part of the Plan, Historic England would welcome the inclusion of reference to the historic environment. This would ensure that there is a positive strategy for the historic environment in line with the requirements of the NPPF.</p>	<p>development <u>reflects the character and identity of</u> with the settlement <u>including the historic environment</u>”</p>
78	Policy HS11: Self Build and Custom-Build Housing	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in Central Lancashire’s attractiveness for business, tourism and as a place to live.</p> <p>This policy should include reference to the historic environment. The historic environment will feature in this area in different ways. This would then ensure that not only does it feature in any proposals for</p>	<p>The text for Policy 1, should be amended to read:</p> <p>b) SBCB plots proposed in areas with sensitive <u>affect</u> heritage and/or environmental constraints <u>assets</u> should include a Design Code, supplemented by individual ‘Plot Passports’, setting out detailed design limitations <u>and a HIA.</u> <u>c) All other policies within the CLLP also apply.</u></p>



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			<p>this area but also matches other areas of the Local Plan. Where sites impact heritage (not sensitive heritage) there will be a need for a HIA as well.</p> <p>Therefore, within this part of the Plan, Historic England would welcome the inclusion of reference to the need to consider all other policies within the plan as well as a need for a HIA. This would ensure that there is a positive strategy for the historic environment in line with the requirements of the NPPF.</p>	
81	Policy HS13: Gypsy, Traveller and Travelling Showperson Needs	Unsound	<p>The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in Central Lancashire's attractiveness for business, tourism and as a place to live.</p> <p>This policy should include reference to the historic environment. The historic environment will feature in this area in different ways. This would then ensure that not only does it feature in any proposals for this area but also matches other areas of the Local Plan.</p> <p>Therefore, within this part of the Plan, Historic England would welcome the either the inclusion of reference to the historic environment or reference to the other policies of the Plan. This would</p>	The text should be amended to include reference to other policies of the Plan or "avoiding harm to the historic environment".



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			ensure that there is a positive strategy for the historic environment in line with the requirements of the NPPF.	
87	Policy EC2: Employment Allocations Chorley	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies contained in Appendix 5 (where relevant). It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p>	<p>Insert reference to the Council's HIA:</p> <p><u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u></p>



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			<p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within Appendix 5 of this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	
88	Policy EC3: Employment Allocations Preston	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies contained in Appendix 5 (where relevant). It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation</p>	<p>Insert reference to the Council's HIA:</p> <p><u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u></p>



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			<p>and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within Appendix 5 of this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	
88	Policy EC4: Employment Allocations South Ribble	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies</p>	<p>Insert reference to the Council's HIA:</p> <p><u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u></p>



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			<p>contained in Appendix 5 (where relevant). It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within Appendix 5 of this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	
89	Policy EC5: Mixed Use Allocations Chorley	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live.</p> <p>Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the</p>	<p>Insert reference to the Council's HIA:</p> <p><u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u></p>



Page	Policy/ Para	Sound/ Unsound	Comments	Suggested amendments
			<p>Local Plan, which includes mitigation/enhancement measures in relation to identified harm.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies contained in Appendix 6 (where relevant). It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, within Appendix 6 of this part of the Plan, Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF.</p>	
99	Policy EC12: Preston City Centre Preston City Centre Role and Function Bullet 8	Unsound	<p>The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in Central Lancashire's attractiveness for business, tourism and as a place to live.</p>	<p>The text of bullet 8 should be amended to read:</p> <p>"Preston Markets will be protected and maintained enhanced as heritage assets providing a locally distinctive retail destination with a focus for community interaction, to</p>



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			The role of the policy should be to protect and enhance heritage assets rather than protect and maintain them as heritage assets. This change will reflect the requirements of national policy on this matter.	serve the needs of Preston’s diverse communities”.
104	Policy EC14: Priorities for Tourism and the Visitor Economy	Unsound	The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Any new development for tourism should enhance a heritage asset rather than improve it. This change will reflect the requirements of national policy on this matter.	Bullet 4b should be amended to say: “development will reuse existing buildings/brownfield land and/or will improve enhance a heritage asset;”
112	Policy HC4: Purpose Built Places of Worship and / or Religious Instruction	Unsound	The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Any new purpose-built places of worship or religious instruction should not harm a heritage asset. This change will reflect the requirements of national policy on this matter.	The text should be amended to include reference to other policies of the Plan or “avoiding harm to the historic environment”.
113	Policy HC5: Provision of New Open Space, Sport and Recreation Facilities	Unsound	The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Any new open space, sport or recreation development should not harm a heritage asset. This change will reflect the requirements of national policy on this matter.	The text should be amended to include reference to other policies of the Plan or “avoiding harm to the historic environment”.



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120	Policy EN1 (Strategic Policy): Well Designed Places	Sound	We support this policy.	None
121	Policy EN2: Design Criteria for New Development	Sound	We support this policy.	None
122	Policy EN3: Tall Buildings	Sound	We support this policy.	None
124	Policy EN4: Amenity	Sound	We support this policy.	None
125	Policy EN5: Green Infrastructure	Sound subject to textual change	<p>The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>When considering the impact of new green infrastructure, it should consider not only the historic character of an area but also the significance of a heritage asset.</p> <p>This insertion will reflect the requirements of national policy on this matter.</p>	<p>Bullet 3c shall read:</p> <p>“Incorporate diverse green infrastructure that is appropriate to the landscape, <u>does not harm the significance of a heritage asset,</u> reflects the local and historic character, and complements existing green infrastructure;</p>
126	EN5.2	Unsound	<p>Historic England objects to this policy.</p> <p>It is unclear from the text whether the (enabling) development and the site allocation will impact on any heritage assets. The NPPF states that positively protecting and enhancing the historic</p>	<p>That the text be amended as follows:</p> <p>6. Land is allocated for a <u>new park, known as</u> Central Park to the northeast of Lostock Hall. To help</p>



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			<p>environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live. But the Local Plan as drafted fails to positively provide a framework that conserves and enhances the historic environment (including setting) as required by national policy within this policy.</p> <p>If the policy is to remain as it is, then Historic England objects to it. The policy proposes the allocation of a set amount of housing (125) which is untested with the Local Plan and its evidence base.</p> <p>Lime Kiln Farm is a Grade II heritage asset. There is a requirement in the NPPF to minimise harm to any heritage asset. The allocation of homes at this site within the Local Plan does not demonstrate that it will accord with national policy on this matter.</p> <p>It also uses the term 'enabling development'. Enabling development is development that would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset. It's reference here is not for that purpose.</p>	<p>deliver the Central Park a limited amount of enabling residential development (up to 125 dwellings at Lime Kiln Farm) may be <u>supported permitted. Any development will be subject to the rest of the policies within the CLLP.</u> However, a <u>Any</u> scheme for residential development must clearly identify how this will enable the <u>new Ppark</u> to be delivered, ensuring good linkages to the wider greenspace network <u>as a minimum.</u> This may <u>will also</u> include the physical transfer of land <u>used for the creation of Central Park</u> to South Ribble Borough Council and/ or developer contributions.</p> <p>Or</p> <p>Removal of reference to enabling development. Include reference to other Local Plan Policies.</p>



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			<p>With this in mind Historic England has suggested an amendment to the text which would deal with the issues outlined above.</p> <p>If the text it not to be amended, there needs to be a production of a heritage impact assessment for this site undertaken by the relevant authority. This assessment would support the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm. This evidence needs to be tied into the plan. The text also should remove reference to enabling development as this reference is incorrect.</p> <p>As drafted, the Local Plan does not ensure that this essential element of the evidence base has been undertaken for the site. It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the HIA and the findings incorporated into the Plan, cannot demonstrate that the site can be developed without harm to the historic environment.</p> <p>Therefore, Historic England would welcome the Council either amending the text as suggested, or undertaking a HIA (with textual amendments to the Policy) and make its content (if relevant) a requirement, which would be in line with the NPPF.</p>	<p>Undertaking a full HIA for the site and tying in its findings to the allocation, which may affect development.</p>



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143	Policy EN13: Heritage Assets and Archaeology	Unsound	<p>Historic England objects to this Policy.</p> <p>The policy (and the Plan as drafted) contained no strategy for the historic environment in the Central Lancashire area, nor does it contain any policies that are locally specific which demonstrate the priorities for the area.</p> <p>One of the principal objectives of planning and achieving sustainable development, under the NPPF is the conservation of heritage assets, for the quality of life they bring to this and future generations (NPPF, Section 2). 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.</p> <p><u>Strategic policies</u> 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.</p>	<p>Policy EN13: Heritage Assets and Archaeology <u>Historic Environment</u></p> <p><u>INSERT SECTION ON LOCALLY SPECIFIC STRATEGY INCLUDING DECISION MAKING</u></p> <p>1. Proposals affecting a designated heritage asset <u>(including an archaeological site of national importance)</u> and/or its setting shall</p> <p>a) conserve, enhance or better reveal the significance of the asset (including its setting). Consideration shall be given to <u>(but not limited to)</u>:</p> <p>i. siting/location, scale/height, layout and materials;</p> <p>ii. the conservation, re-statement, repair and/or revealing of features, elements and historic fabric, which contribute to the asset's significance and/or character and appearance;</p> <p>iii. the contribution made by the immediate setting (including any landscaping and boundary</p>



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			<p>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.</p> <p>It is expected that this information be inserted within this section, so that the Local Plan presents a locally specific strategy for Central Lancashire's historic environment.</p> <p>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.</p> <p>The Local Plan for Central Lancashire should include specific policies for all types of heritage assets in order to help inform decisions that affect it and others should where possible cross-reference heritage related issues. The Plan as drafted includes gaps affecting archaeology, conservation areas and levels of harm,</p> <p>Historic England has suggested some alternative wording and has requested that a section on the strategy for the area be included. We can provide support on this. Without this the Plan is considered unsound as it does not accord with the requirements of the NPPF.</p>	<p>treatments) to the significance of the asset;</p> <p>iv. any impacts on the surrounding historic environment;</p> <p>v. whether the proposed use best preserves its significance;</p> <p>vi. avoiding/mitigating any conflict with the conservation of the heritage asset or adjacent heritage assets.</p> <p>2. Proposals involving the total loss and/or 'substantial harm' to a designated heritage asset (including an archaeological site of national importance) and its setting will not be supported. <u>This is unless</u> it can be demonstrated that the substantial harm/total loss is necessary and will provide substantial 'public benefits', justified by evidence consistent with national policy. This evidence should include documented efforts to find suitable new uses for the asset.</p> <p><u>3. Where a proposal would lead to less than substantial harm to the significance of a designated</u></p>



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				<p><u>heritage asset, the harm will be weighed against the public benefits of the proposal and permission will only be granted where the benefits outweigh the harm</u></p> <p>4. Where the loss of the whole or part of a designated heritage asset is <u>justified and the harm</u> accepted, this will be subject to conditions and/or planning obligations, to ensure that the <u>total loss or substantial harm</u> lost asset is fully recorded, archived and a copy of the report(s) deposited with the Lancashire Historic Environment Record (HER).</p> <p>b) be accompanied by a suitably detailed Heritage Statement providing an understanding of the asset's significance and explaining the impact of the proposal on the asset's significance.</p>



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				<p>4. <u>Proposals within or affecting the setting of a Conservation area will only be permitted where it preserves and/or enhances the character and appearance of the area.</u> Where proposals affect a conservation area <u>or its setting</u> (as shown on the policies map), or its setting, these shall be informed by the assessments of significance contained within any Conservation Area Appraisals and Management Plans. <u>This will include those elements which have been identified as having a positive or negative contribution to the significance of that area.</u></p> <p>5. Proposals that seek to repair and/or re-use designated heritage assets registered on Historic England's 'Buildings at Risk Register' in a manner appropriate to their special interest will be supported.</p> <p>4. Proposals involving the total loss or 'substantial harm' to a designated heritage asset will not be supported,</p>



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				<p>unless it can be demonstrated that the harm/loss will provide substantial 'public benefits', justified by evidence consistent with national policy. This evidence should include documented efforts to find suitable new uses for the asset.</p> <p>5. Where the loss of the whole or part of a designated heritage asset is accepted, this will be subject to conditions and/or planning obligation, to ensure that the lost asset is fully recorded, archived and a copy of the report(s) deposited with the Lancashire Historic Environment Record (HER).</p> <p>6. <u>All applications will</u> be accompanied by a suitably detailed Heritage Statement <u>and/or a desk based archaeological assessment of the site.</u> <u>This will provideing</u> an understanding of the asset's significance and explaining the impact of the proposal on the asset's significance. <u>Any harm identified will need justification and be</u></p>



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				<p><u>mitigated. This could for part of a Design and Access Statement. This should provide the information necessary to assess the impact of the proposals on the heritage asset and its setting including demonstrating how the proposal has taken into account the elements that contribute to its significance, including where relevant, its architectural and historic interest, character and appearance.</u></p> <p>Non-designated Heritage Assets</p> <p>7. The impact <u>level of harm</u> on the significance of a Non-Designated Heritage Asset including its setting, identified by the Council <u>(before or during the planning application)</u> as having local heritage significance, will be given weight in any decision. Any harm or loss of significance, including total loss, will be weighed against all other aspects of the scheme, including any positive</p>



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				<p>aspects provided in undertaking the work on the asset itself.</p> <p><u>8. Where the proposal affects (non-designated) archaeological sites of less than national importance it should conserve those elements which contribute to their significance in line with the importance of the remains. In those cases where development affecting such sites is acceptable in principle, mitigation of damage will be ensured through the preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development, the findings of which should be deposited with the Historic Environment Record.</u></p> <p>Energy efficiency adaptations</p>



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				<p>69. Proposals to install equipment, retrofit measures and other features pursuant to improving energy efficiency, should be sited to minimise any avoid harm to the heritage asset's significance. Evidence regarding the benefits that the adaptations are likely to achieve should also be provided.</p> <p>Non-designated Heritage Assets</p> <p>7. The impact on the significance of a Non-Designated Heritage Asset including its setting, identified by the Council as having local heritage significance, will be given weight in any decision. Any harm or loss of significance, including total loss, will be weighed against all other aspects of the scheme, including any positive aspects provided in undertaking the work on the asset itself</p>
152	Policy EN17: Development in the Open Countryside	Unsound	The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.	The text should be amended to include reference to other policies of the Plan or "avoiding harm to the historic environment".



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			Any new development in the open countryside should not harm a heritage asset. This change will reflect the requirements of national policy on this matter.	
158	Policy CC1 (Strategic Policy): Climate Change	Unsound	<p>The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Any proposals to provide for climate change should not harm a heritage asset. This change will reflect the requirements of national policy on this matter.</p>	The text should be amended to include reference to other policies of the Plan or “avoiding harm to the historic environment”.
159	Policy CC2: Renewable Energy Generation and District Heating Networks	Unsound	<p>The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Any proposals to provide for renewable energy should not harm a heritage asset. This change will reflect the requirements of national policy on this matter.</p>	The text should be amended to include reference to other policies of the Plan or “avoiding harm to the historic environment”.
161	Policy CC3: Reducing Energy Consumption	Sound	<p>The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>We welcome reference to the need to consider other Local Plan Policies, which include the historic environment.</p>	None.



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173	Policy ID2: Developer Contributions and Planning Obligations	Unsound	<p>The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Heritage assets should be included on the list of developer contributions. This change will reflect the requirements of national policy on this matter.</p>	<p>Text of bullet 2 should include:</p> <p><u>Heritage assets</u></p>
175	Policy ID3: Digital and Communications Infrastructure	Unsound	<p>The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well.</p> <p>Any proposals to provide for Digital and Communications Infrastructure should not harm a heritage asset. This change will reflect the requirements of national policy on this matter.</p>	<p>The text of 1c should read:</p> <p>Developments should not have an unacceptable impact on <u>harm</u> ecology, areas of landscape importance or the historic environment, unless it can be demonstrated that no technically acceptable alternative site is available, and the public benefits of the proposal outweigh the harm caused</p>
186	i. Monitoring the Local Plan Policies	Unsound	<p>There does not seem to be any section on how the historic environment will be monitored.</p>	<p>Introduce a section on monitoring of the historic environment.</p>

