



Central Lancashire Local Plan 2023-2041

Statement of Common Ground Between the Central Lancashire Authorities (Chorley Council, Preston City Council and South Ribble Borough Council) and Historic England

June 2025

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1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been developed in order to address strategic planning matters between the parties consisting of the Central Lancashire Authorities (CLAs) of Chorley, Preston and South Ribble, and Historic England (HE).
- 1.2 The SoCG has been prepared to comply with the National Planning Policy Framework (NPPF) requirements. Paragraph 24 to 27 of the NPPF¹ state that “Local Planning Authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”. Moreover, the “strategic policy-making authorities should prepare and maintain one or more statement of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these”. Paragraphs 20 to 23 set out how the duty to cooperate works and how strategic matters that cross administrative boundaries require effective and on-going cooperation. These matters include:
- Housing (including affordable housing), employment, retail, leisure and other commercial development;
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - Community facilities (such as health, education and cultural infrastructure); and
 - Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 1.3 According to the Planning Practice Guidance (PPG)², a SoCG is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective cooperation is and is not happening throughout the plan-making process and is a way of demonstrating at examination that plans are deliverable over the plan period and based on effective joint working across local authority boundaries. It forms part of the evidence required to demonstrate compliance with the duty to cooperate.
- 1.4 Both NPPF and PPG make it clear that a SoCG should primarily be produced to document the strategic cross-boundary matters. Therefore, this SoCG is the written record account of the progress achieved in the planning process for

¹ NPPF Version December 2023

² Under the Section of Plan-Making

strategic matters in Central Lancashire and how the CLAs have worked effectively to fulfil their duty to cooperate. The approach taken in writing this statement is in accordance with the requirements of the PPG.

2. Background of Central Lancashire

- 2.1 Central Lancashire covers the geographical areas of Preston City Council, Chorley Borough Council and South Ribble Borough Council, which functions as one integrated local economy and commuting area. It is a single housing market area with high levels of self-containment, or families moving within the area. It is therefore appropriate to work strategically in collaboration to ensure our policy is joined up and complementary.
- 2.2 The joint working on planning-related matters began in 2008, when the three councils came together and produced a Central Lancashire Core Strategy, which was adopted in July 2012. It sets out the strategic planning policies for Central Lancashire. In 2018, a review of the Core Strategy and individual local plans began with a view to deliver a single Central Lancashire Local Plan (CLLP), reflecting both the shared strategic policy objectives and more detailed non-strategic policies.
- 2.3 A Central Lancashire Strategic Planning Joint Advisory Committee (JAC) has been established, made-up of elected members from each authority. This Committee has the responsibility to consider proposals, open them up to debate and move to endorse or challenge them at their discretion. Members from LCC also attend the JAC.
- 2.4 A Central Lancashire Local Plan Team has been created and jointly funded by the three local authorities specifically to undertake the work required to deliver the review of the local plan. The team is accountable to all three local authorities, reporting back to each home team and guiding the process forward.

3. Strategic Geography

- 3.1 Central Lancashire is in the heart of Lancashire within the North West Region and covers the three local authority districts of Chorley, Preston and South Ribble. It comprises an urban core surrounded by attractive scenery ranging from the Pennine foothills/West Pennine Moors in the East, to the Lancashire Plain and the Ribble and Alt Estuary in the West. The area is bounded by Fylde and West Lancashire to the West, Ribble Valley and Blackburn with Darwen to the East, Wyre to the North and Greater Manchester to the South.

- 3.2 The Central Lancashire area is a diverse mix of urban and rural including towns, villages, and sparsely populated countryside. Some of the main landscape attractions and protected wildlife habitats in the area include the Forest of Bowland National Landscape, the West Pennine Moors SSSI, and the Ribble and Alt Estuaries. There are also significant areas of open space and attractive public parks for sport, leisure, and recreation. Grid-iron pattern streets typify the urban areas of Preston, Chorley, and Leyland, as workers housing was built tightly around the mills and industrial complexes.
- 3.3 The area covered by the Central Lancashire Local Plan is shown in the map below.



4. Central Lancashire Authorities and Historic England

- 4.1 HE is a Duty to Consult (DtC) body, and the government's statutory adviser on the historic environment. As the purpose of HE is to comment on the conservation and enhancement of heritage, this statement sets out the point of agreement with specific reference to heritage matters within the CLLP. Consequently, unlike other SOCG signed with other parties, it is not considered necessary to set out agreement on strategic matters as these are not the focus of HE.
- 4.2 This SoCG is therefore prepared to inform the Inspector appointed for the Central Lancashire Local Plan Examination and other parties about the areas of agreement/disagreement between the CLAs and HE in relation to heritage matters contained in the Central Lancashire Local Plan (2023-2041).
- 4.3 Heritage has been a consideration throughout the preparation of the CLLP. The Central Lancashire Strategic Housing and Employment Land Availability Assessment (SHELAA) undertook a desktop assessment of each site to identify any relevant constraints, including heritage features, and discounted them if they were wholly affected by prescribed constraints. These constraints included scheduled monuments and registered parks and gardens. Where only part of the site was affected by the constraint (or not affected at all), the site was taken forward to Stage 2 of the study for more detailed assessment to determine its suitability, availability and achievability for development. The detailed assessments included Heritage Impact Assessment (HIA).
- 4.4 HE advised the CLAs on how to prepare HIAs to inform site selection. The [HIA Methodology and Reports](#) confirms the CLAs have worked with HE to identify which sites required a HIA and to input on methodology and outcomes. Several HIAs were also reviewed by HE to ensure consistency.
- 4.5 HE has submitted comments through the plans' consultation stages, including Issues and Options (Regulation 18) and Local Plan Preferred Options Part One (Regulation 18). The [Part One Consultation Statement](#) summarises comments from Historic England.
- 4.6 These comments were considered by the CLAs, in conjunction with heritage and conservation officers at Growth Lancashire, as the CLLP was prepared. Within the CLLP, *Policy EN13: Heritage Assets and Archaeology* will be used to ensure development proposals appropriately consider the historic environment.

5. Heritage Matters

- 5.1 This SoCG reflects the agreed position between the CLAs and HE in relation to heritage matters, following representations made by HE through the Regulation 19 consultation.
- 5.2 The CLAs and HE agree on the inclusion of heritage within the CLLP’s Vision and Strategic Objectives with the intended purpose of ensuring heritage is given appropriate consideration through the development plan. As detailed in Section 4, the CLAs have prepared Heritage Impact Assessments (HIAs) for relevant sites within the CLLP, following a methodology proposed by HE.
- 5.3 HE has raised a number of concerns about the historic environment in the Regulation 19 Local Plan which includes the lack of a locally specific strategic policy for the historic environment within Policy EN13 as well as a lack of consistency. The CLAs note HE’s comments but consider that the plan as drafted is sound and compliant with the NPPF, and therefore the modifications proposed by HE are not necessary.
- 5.4 HE consider that their proposed changes seek to give heritage the same treatment as other matters in the local plan such as the natural environment. This includes direct reference to the historic environment (amongst other matters) within specific policies and key development considerations. The CLAs however consider that *Policy EN13: Heritage Assets and Archaeology* provides the appropriate policy direction and achieves consistency with the NPPF. In response to the HE’s Regulation 19 representations, the CLAs recognise that some wording changes proposed by HE could improve the clarity of Policy EN13 but still consider the policy as drafted to be sound. HE has proposed a series of additional modifications to the wider content of the plan, including paragraphs, objectives and policies, to directly reference heritage considerations. Again, the CLAs consider the current wording of the CLLP to be sound.
- 5.5 A table summarising HE’s responses to the Regulation 19 consultation, and the CLA responses, can be found as Appendix 1 to this statement.
- 5.6 The CLAs and HE agree that they will continue to work together on heritage issues arising through the examination process.

Heritage:	The signatories agree that: <ul style="list-style-type: none">• The CLLP has considered the conservation and enhancement of the historic environment.• The CLAs and HE will continue to work together on heritage issues arising through the examination process.
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6. Signatories

Historic England

On behalf of Historic England, I can confirm that: There is common ground on the draft planning policies set out in the emerging Central Lancashire Local Plan (2023-2041); and that there are no unresolved strategic issues in relation to matters set out in Section 5 of this statement.	
Signed:	<i>E. Hrycan</i>
Date:	25 June 2025
Name:	Emily Hrycan
Position:	Historic Environment Planning Adviser

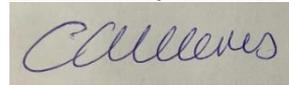
Central Lancashire Authorities

Chorley Council



Zoe Whiteside, Head of Spatial Planning

Preston City Council



Carolyn Williams, Planning Policy Manager

South Ribble Borough Council



Elizabeth Thornber, Head of Planning and Enforcement

7. Appendix

Appendix 1: Summary of Historic England’s representations at Regulation 19 and the CLAs response

The table below lists out the summary of the Comments made by Historic England on the CLLP Regulation 19 Consultation and responses from Central Lancashire Authorities.

Page	Policy/Para	S/US*	Comments from HE	Suggested Amendments by HE	Response from CLA
13	Para 2.4	S	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.	Not Required.	Noted
13	Para 2.5-2.7	S	Historic England supports this section.	Not Required.	Noted
15	Para 2.8-2.18	US	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 would ensure that	Introduce reference to the ‘historic environment’ within this section of the Plan.	Comments noted. As the Historic Environment is considered within the NPPF, to reduce duplication within the local policies the Historic Environment and its protection has its own policy and is also referenced several other policies and/or the narratives, chapters and strategic objectives throughout the Local Plan.

Page	Policy/Para	S/US*	Comments from HE	Suggested Amendments by HE	Response from CLA
			there is a positive strategy for the historic environment in line with the requirements of the NPPF.		
19	Vision	US	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. 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.	The text be amended to read: Our heritage assets <u>historic and natural environment</u> will be conserved and <u>enhanced</u> our natural environment will be protected and enhanced for its intrinsic value whilst providing opportunities for <u>enjoyment</u> , recreation and leisure."	The Spatial Vision is a broad statement. It is not necessary to load it with technical terminology covered by other policies.
21	Objective 6	S	Historic England supports Strategic Objective 6.	Not Required.	Support welcomed.
21	Objective 7	S	Historic England supports Strategic Objective 6.	Not Required.	Support welcomed.
22	Objective 8	S	Historic England supports Strategic Objective 6.	Not Required.	Support welcomed.
23	Policy SS1	S	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.	Not Required.	Noted.
26	Para 3.15	S*	Rather than 'maintain and enhance' in reference to the historic environment it should be 'conserve and enhance' in line with the NPPF.	The text be amended to read: " Maintain <u>Conserve</u> and enhance the natural and historic environment...."	Changes proposed are agreed.
29	Policy SS3	US	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 the area's attractiveness for business, tourism and as a place to live.	The text of Bullet 3g be amended to read: "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> "	The Council's evidence base (including the SHELAA, SFRAs, and Site Selection Process) detail how all of the allocation sites have been assessed and identified. In addition, the Council collect delivery information from landowners/developers to inform their 5-year land supply. The Councils believe all the allocations to be deliverable (suitable, achievable, available). The Preston Housing Need and Demand Assessment has also identified a continued need for over 55's accommodation to be provided throughout the plan period. The council will considered wording

Page	Policy/Para	S/US*	Comments from HE	Suggested Amendments by HE	Response from CLA
					changes through the EiP to tighten the restrictions for the type of development that can be delivered on these sites to secure the provision of this type of housing.
33	Policy SS3	US	<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. 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. 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>	The text of Policy EN13 for the site should be amended to read: "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 updated HIA to inform any development criteria that may be required to mitigate harm <u>or enhance heritage assets</u> resulting from development.	Council notes the comments but consider the policy addresses this sufficiently as drafted. We also note an error in the representation referring to SS3, not SS5 which this comment refers too
34	Policy SS4 Bullet 1	S*	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 the area's attractiveness for business, tourism and as a place to live. Historic England welcomes the production of heritage impact assessments for the sites, that have	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 an Ancient Battlefield</u> ".	Noted. The following changes are proposed in response to the comments received.

Page	Policy/Para	S/US*	Comments from HE	Suggested Amendments by HE	Response from CLA
			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.		
34	Policy SS4 Bullet 3	US	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. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. 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. The suggested change to Bullet 1 is to match its status, as it is not considered an Ancient Battlefield.	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> "	The changes as proposed are set out below. The HIA for this site was also prepared by the MOD with support from the Council and HE, as such the word change is not included to reflect that. We also note the error in referencing as this relates to SS4 Policy text (1) "...car parking, and areas of open land including playing fields and <u>where the Battle of Preston occurred an Ancient Battlefield</u> ".
35	Policy SS4 – EN1	US	See text on Policy SS4 (in which this sits) above. 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).	The text should be amended to read: " A detailed Heritage Impact Assessment has been prepared to support the allocation. Given the significant assets on site, a design code <u>and masterplan</u> is required as part of the Masterplanning. 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	The councils recognise that wording changes proposed may help improve the clarity of the policy and supporting text . The councils will continue to work with Historic England through the examination process and through any SoCG prepared.

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				assessed through the planning 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 <u>will</u> reflect the actual number of housing units considered acceptable on site. Good design could increase <u>will influence</u> the number of units considered acceptable.	
37	Policy SS4 – EN13	US	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 the area's attractiveness for business, tourism and as a place to live. 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. 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. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. Therefore, within	The text should be amended to read: 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 likely require a level of archaeological mitigation.	The councils recognise that wording changes proposed may help improve the clarity of the policy and supporting text . The councils will continue to work with Historic England through the examination process and through any SoCG prepared.

Page	Policy/Para	S/US*	Comments from HE	Suggested Amendments by HE	Response from CLA
			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.		
38	Policy SS5: Bullet 4j	US	<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 the area's attractiveness for business, tourism and as a place to live. 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. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. 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>	The text should be amended to read: "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> "	The councils recognise that wording changes proposed may help improve the clarity of the policy and supporting text . The councils will continue to work with Historic England through the examination process and through any SoCG prepared
42	Policy SS5 - EN13	US	The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable	The text should be amended to read: "Any planning application to develop the site will need to be accompanied	The councils recognise that wording changes proposed may help improve the clarity of the policy

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			<p>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 the area's attractiveness for business, tourism and as a place to live. 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. 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. The suggested change to the text is to match the other site allocations which do not list the heritage assets affected. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. 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>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. The site contains a number of heritage assets. including: Loyland 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 Development of the site will require a <u>detailed HIA to inform any development criteria that may be required to and to inform any mitigation/enhancement measures needed harm resulting from as part of the development. 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>	<p>and supporting text . The councils will continue to work with Historic England through the examination process and through any SoCG prepared</p>
56	Policy HS2	US	<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</p>	<p>Insert reference to the Council's HIA: <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>	<p>Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining</p>

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			<p>role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live. 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. 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. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. 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>		<p>the impact of the proposals on the asset's significance.</p>
58	Policy HS3	US	<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 the area's attractiveness for business, tourism and as a place to live. 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: <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>	<p>Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance.</p>

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			Local Plan, which includes mitigation/enhancement measures in relation to identified harm. 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. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.		
60	Policy HS4	US	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 the area's attractiveness for business, tourism and as a place to live. 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. 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	Insert reference to the Council's HIA: <u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u>	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance.

Page	Policy/Para	S/US*	Comments from HE	Suggested Amendments by HE	Response from CLA
			ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. 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.		
67	Policy HS6 – Bullet 3b and 4	US	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. 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. 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 an area. Development normally requires maximising development of a site. The lower density need is a requirement where it demonstrates the harm rather than permitted if it can justify. This would provide the LPA with comfort that they can request a lower	The text should be amended on Bullet 3b to read: “There is no detrimental impact <u>harm</u> on the amenity, character, appearance, distinctiveness, <u>heritage assets</u> and environmental quality of the surrounding area.” Bullet 4 should be amended to read: “Lower densities will only be permitted <u>be required</u> where it can be demonstrated that: a) The minimum density would cause harm to the character or appearance of an area, <u>including heritage assets</u> ; and/or b) There are site specific constraints that reduce the developable area of the site; and/or	The Councils note that the changes could improve the clarity of the policy but remain confident that the plan as drafted is sound. It is not considered necessary to add reference to the historic environment into the policy as Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.

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			density where there is any harm caused. There is suggested amendment to the text which demonstrates this change. 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 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.		
70	Para 4.52	US	See comments above on reference to density.	Any amendments to the Policy should be reflected in the supporting text.	The Councils note that the changes could improve the clarity of the policy but remain confident that the plan as drafted is sound. It is not considered necessary to add reference to the historic environment into the policy as Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.
75	Policy HS8	US	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	Policy 1c should read: “The scale and nature of the development <u>reflects the character and identity of with the settlement including the historic environment</u> ”	It is not considered necessary to add reference to the historic environment into the policy as Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.

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			the role heritage and culture plays in Central Lancashire's attractiveness for business, tourism and as a place to live. 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. 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.		
78	Policy HS11	US	<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 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. 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>	<p>The text for Policy 1, should be amended to read: 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></p> <p><u>c) All other policies within the CLLP also apply.</u></p>	<p>Heritage is covered adequately within HS11 (and other policies) already.</p> <p>Note that Policy EN13 already triggers the requirement for a Heritage Statement where heritage assets may be impacted by development.</p> <p>It is unnecessary to state that applications will also be subject to other plan policies.</p>
81	Policy HS13	US	The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable	The text should be amended to include reference to other policies of	It is not considered necessary to add reference to the historic environment into the policy as

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			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. 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. 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 ensure that there is a positive strategy for the historic environment in line with the requirements of the NPPF.	the Plan or "avoiding harm to the historic environment".	Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.
87	Policy EC2	US	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 the area's attractiveness for business, tourism and as a place to live. 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. 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	Insert reference to the Council's HIA: <u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u>	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance. It is therefore not necessary to include this requirement within the KDCs of each allocation site.

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			<p>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>		
88	Policy EC3	US	<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 the area's attractiveness for business, tourism and as a place to live. 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. 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. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. 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>	<p>Insert reference to the Council's HIA: <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>	<p>Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance. It is therefore not necessary to include this requirement within the KDCs of each allocation site.</p>

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88	Policy EC4	US	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 the area's attractiveness for business, tourism and as a place to live. 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. 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. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. 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.	Insert reference to the Council's HIA: <u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u>	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance. It is therefore not necessary to include this requirement within the KDCs of each allocation site.
89	Policy EC5	US	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	Insert reference to the Council's HIA: <u>Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.</u>	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the

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			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. 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. 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. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. 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.		asset's significance and explaining the impact of the proposals on the asset's significance. It is therefore not necessary to include this requirement within the KDCs of each allocation site.
99	EC12 Bullet Point 8	US	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.	The text of bullet 8 should be amended to read: "Preston Markets will be protected and maintained enhanced as heritage assets providing a locally distinctive retail destination with a focus for community interaction, to serve the needs of Preston's diverse communities".	Wording of Part 8 of Policy EC12 to be amended as to read "Preston Markets will be protected and enhanced..." to be consistent with national policy requirements.
104	Policy EC14	US	The NPPF states that positively conserving and enhancing the historic environment is an important	Bullet 4b should be amended to say: "development will reuse existing	The councils recognise that wording changes proposed may

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			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.	buildings/brownfield land and/or will improve <u>enhance</u> a heritage asset;"	help improve the clarity of the policy and supporting text. The councils will continue to work with Historic England through the examination process and through any SoCG prepared.
112	Policy HC4	US	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".	The councils recognise that wording changes proposed may help improve the clarity of the policy and supporting text. The councils will continue to work with Historic England through the examination process and through any SoCG prepared.
113	Policy HC5	US	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".	The Local Plan should be read as a whole, and as such, it is considered that the protections afforded by Policy EN13 will ensure that harm to the historic environment is avoided if Policy HC5 is triggered as a result of a Planning Application.
120	Policy EN1	S	We support this policy.	Not Required.	Noted.
121	Policy EN2	S	We support this policy.	Not Required.	Noted.
122	Policy EN3	S	We support this policy.	Not Required.	Noted.
124	Policy EN4	S	We support this policy.	Not Required.	Noted.
125	Policy EN5	S*	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. 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. This insertion will reflect the requirements of national policy on this matter.	Bullet 3c shall read: "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;	It is not considered necessary to add reference to the historic environment into the policy as Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.
126	Policy EN5	US	Historic England objects to this policy. It is unclear from the text whether the (enabling) development and the site allocation will impact on any heritage	That the text be amended as follows: 6. Land is allocated for a <u>new park</u> , known as Central Park to the	Policy EN5 (and EN5.2) confirm that land is allocated in the CLLP for a new 'Central Park', and that

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			<p>assets. 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 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. 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. 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. 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. With this in mind Historic England has suggested an amendment to the text which would deal with the issues outlined above. If the text is 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</p>	<p>northeast of Lostock Hall. To help deliver the Central Park a limited amount of enabling residential development (up to 125 dwellings at Lime Kiln Farm) may be <u>supported permitted</u>. <u>Any development will be subject to the rest of the policies within the CLLP. However, a</u> Any scheme for residential development must clearly identify how this will enable the <u>new Park</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 to South Ribble Borough Council and/ or developer contributions.</u></p> <p>Or Removal of reference to enabling development. Include reference to other Local Plan Policies.</p> <p>Undertaking a full HIA for the site and tying in its findings to the allocation, which may affect development.</p>	<p>residential development is expected to be required to support the viability of the scheme and enable the delivery of the park. It is considered that the policy explains this through its current wording. Additional information is also provided through paragraphs 7.30 and 7.31.</p> <p>Any impacts on heritage that may arise as a result of the park's delivery will be considered against other CLLP policies, including EN13. It is not considered necessary to amend policy EN5.</p>

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			reference to enabling development as this reference is incorrect. 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. 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. 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.		
143	Policy EN13	US	<p>Historic England objects to this Policy. 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. 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></p>	<p>Policy EN13: Heritage Assets and Archaeology <u>Historic Environment</u> <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 also conserve, enhance or better reveal the significance of the asset (including its setting). Consideration shall be given to (but not limited to):</p> <ul style="list-style-type: none"> i. siting/location, scale/height, layout and materials; ii. the conservation, re-instatement, repair and/or revealing of features, elements and historic fabric, which 	The Councils recognise that wording changes as proposed could improve the clarity of the policy but consider the policy as drafted is sound. It is not necessary to repeat national policy within the NPPF.

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			<p>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>contribute to the asset's significance and/or character and appearance; iii. the contribution made by the immediate setting (including any landscaping and boundary treatments) to the significance of the asset; iv. any impacts on the surrounding historic environment; v. whether the proposed use best preserves its significance; vi. avoiding/mitigating any conflict with the conservation of the heritage asset or adjacent heritage assets.</p> <p>b) <u>All applications will be accompanied by a suitably detailed Heritage Statement and/or a desk based archaeological assessment of the site. This will provide an understanding of the asset's significance and explaining the impact of the proposal on the asset's significance. Any harm identified will need justification and be 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>	

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				<p>2. <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 or its setting (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>3. 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 <u>and/or 'substantial harm' to a designated heritage asset (including an archaeological site of national importance) and its setting</u> will not be supported. This is Unless it can be demonstrated that the <u>substantial harm/total loss is necessary and will provide substantial 'public benefits', justified by evidence consistent with national policy.</u> This evidence should include documented efforts to find suitable new uses for the asset.</p>	

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				<p><u>5.</u>Where a proposal would lead to less than substantial harm to the significance of a designated 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</p> <p><u>56.</u> Where the loss of the whole or part of a designated heritage asset is justified and the harm accepted, this will be subject to conditions and/or planning obligations, to ensure that the total loss or substantial harm lost asset is fully recorded, archived and a copy of the report(s) deposited with the Lancashire Historic Environment Record (HER).</p> <p>Energy efficiency adaptations</p> <p><u>67.</u> Proposals to install equipment, retrofit measures and other features pursuant to improving energy efficiency, should be sited to minimise any <u>avoid</u> 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><u>78.</u> 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</p>	

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				<p>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> <p><u>89. 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>	
152	Policy EN17	US	<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 new development in the open countryside should not harm a heritage asset. This change will reflect the requirements of national policy on this matter.</p>	<p>The text should be amended to include reference to other policies of the Plan or “avoiding harm to the historic environment”</p>	<p>Noted. Suggested policy wording is covered in Policy EN13.</p>
158	Policy CC1	US	<p>The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable</p>	<p>The text should be amended to include reference to other policies of</p>	<p>The Local Plan should be read as a whole, and as such, it is considered that the protections afforded by</p>

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			development and this is supported by the PPG as well. 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.	the Plan or “avoiding harm to the historic environment”.	Policy EN13 will ensure that harm to the historic environment is avoided if Policy CC1 is triggered as a result of a Planning Application.
159	Policy CC2	US	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 proposals to provide for renewable energy 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”.	The Local Plan should be read as a whole, and as such, it is considered that the protections afforded by Policy EN13 will ensure that harm to the historic environment is avoided if Policy HC5 is triggered as a result of a Planning Application.
161	Policy CC3	S	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. We welcome reference to the need to consider other Local Plan Policies, which include the historic environment.	Not Required.	The representation of support is welcomed by the Councils.
173	Policy ID2	US	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. Heritage assets should be included on the list of developer contributions. This change will reflect the requirements of national policy on this matter.	Text of bullet 2 should include: <u>Heritage assets</u>	Policy ID2 confirms that development is expected to contribute to mitigating its impact on services, facilities, infrastructure and the natural environment, as a result of additional demand and impacts caused by new development. It is not clear how heritage assets would commonly be impacted by new development to warrant a specific listing with part (2) of the policy. Any site-specific contributions which may arise can be addressed as item (k) within the list.
175	Policy ID3	US	The NPPF states that positively conserving and enhancing the historic environment is an important	The text of 1c should read: Developments should not have an	The policy as worded ensures that ecology, areas of landscape

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			component of the drive to achieve sustainable development and this is supported by the PPG as well. 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.	unacceptable impact on harm 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	importance or the historic environment are protected from harm from development of digital and communications infrastructure. The requirement that development should not have an unacceptable impact allows for development whilst also ensuring that there are no adverse impacts. No modification is needed to the policy.
186	Monitoring	US	There does not seem to be any section on how the historic environment will be monitored.	Introduce a section on monitoring of the historic environment.	It is considered that there are sufficient national monitoring schemes, such as the annual Heritage at Risk register, to ensure a robust monitoring scheme is in place which covers the historic assets within the Plan area.

S = Sound

US = Unsound

*= subject to a textual amendment

The table below lists out the summary of the Comments made by Historic England on the CLLP Regulation 19 Consultation and responses from Central Lancashire Authorities on the Integrated Assessment.

Page	Policy/Para	IA Score	Comments from HE	Response from CLA
19	Spatial Vision	+?	We disagree with the IA. The policy as drafted does not correctly refer to the historic environment/heritage assets as reinforced within national policy and legislation that is needed to manage these. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment	As explained in paragraph 6.5 of the IA (final bullet point), the spatial vision is considered to have a minor positive effect in relation to IA objective 16b: Historic environment, as it refers to the conservation of heritage assets in Central Lancashire. We explain in paragraph 6.7 that all the effects of the vision are subject to some uncertainty since their achievement will depend on the details of the Local Plan policies and site allocations which are designed to implement it (and have been appraised separately).
29	Policy SS3	-?	We disagree with the IA The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
34	Policy SS4	-?	We disagree with the IA The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the MOD/ Council. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this -policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative

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				effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
38	Policy SS5	-?	We disagree with the IA The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
56	Policy HS2	-?	We disagree with the IA The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. It also does not seek to enhance heritage assets only mitigate harm. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA. With regard to Policy HS2, the IA acknowledges in paragraph 6.129 that key considerations relating to the historic environment are only identified for 3 of the 37 sites allocated in this policy.

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58	Policy HS3	-?	We disagree with the IA The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
60	Policy HS4	-?	We disagree with the IA The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
67	Policy HS6	0	We disagree with the IA. The policy as drafted does not refer to the impact on the historic environment as reflected in national policy and legislation that is needed to manage these. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	Policy HS6 is considered to have a minor negative effect shown by the symbol '-' and not '0' against IA objective 16b. The policy will conserve the character, appearance and distinctiveness of the area, as well as encourage the protection of rural landscapes through promoting appropriate density outside settlement boundaries. However, it promotes high density development in Preston City Centre, which contains some of Central Lancashire's

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				most sensitive heritage assets and so it could cause harm to these assets (paragraph 6.64). There is no need for the policies contained within the Local Plan to repeat national policy and legislation.
75	Policy HS8	0	We disagree with the IA. The policy as drafted does not correctly refer to the character and identity of the settlement and the historic environment. This is needed so that it reflects the policy and legislation that is needed to manage these. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	Policy HS8 is found to have a negligible ('0') effect against IA objective 16b as it does not contain any wording regarding the historic environment and is not considered to have adverse effects on the historic environment. That is not to say that additional wording would not result in positive effects.
78	Policy HS11	+?	We disagree with the IA. The policy as drafted does not correctly refer to heritage assets, a HIA and other site policies. This is needed so that it reflects the policy and legislation that is needed to manage these. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	Policy HS11 is found to have a potential minor positive ('+?') effect against IA objective 16b. This is due to the fact the policy states that plots proposed in areas with sensitive heritage constraints should include a Design Code, supplemented by individual 'Plot Passports' setting out detailed design limitations. Additionally, custom and self-build houses must meet local design standards and characteristics (paragraph 6.99).
81	Policy HS13	0	We disagree with the IA. The policy as drafted does not correctly refer to avoiding harm to heritage assets or the historic environment. This is required so that it reflects national policy and legislation that is needed to manage these. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	Policy HS13 has a negligible ('0') effect against IA objective 16b. This is due to the fact that both sites allocated under this policy are pre-existing and so despite their proximity to heritage assets, effects on the historic environment will be limited (paragraph 6.111).
87	Policy EC2	0?	We disagree with the IA. The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative

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				effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
88	Policy EC3	-?	We disagree with the IA . The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
88	Policy EC4	-?	We disagree with the IA. The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
89	Policy EC5	-?	We disagree with the IA. The policy as drafted does not tie into the Local Plan, the HIA and its content undertaken by the Council. If the Local Plan is amended as recommended in my comments (see separate letter on	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the

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			the Local Plan), then the impact of this policy would be positive on the historic environment.	significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA.
99	Policy EC12	+	We disagree with the IA. The policy as drafted does not seek to enhance heritage assets. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	Policy EC12 is considered to have a minor positive ('+') effect against IA objective 16b, as it requires Preston Markets to be protected and maintained as heritage assets, which will aid in conserving Central Lancashire's heritage assets and their settings(paragraph 6.211). Although the policy does not seek to enhance Preston Markets, IA objective 16b seeks to conserve and/or enhance heritage assets and their settings, so by protecting and maintaining Preston Markets Policy EC12 will have a positive effect on the achievement this objective.
112	Policy HC4	0	We disagree with the IA. The policy as drafted does not include reference to the historic environment. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are development management policies that do not generally contain any wording relating to the protection and enhancement of the historic environment. As such, most receive a negligible effect against IA objective 16b.
113	Policy HC5	0	We disagree with the IA. The policy as drafted does not include reference to the historic environment. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are development management policies that do not generally contain any wording relating to the protection and enhancement of the historic environment. As such, most receive a negligible effect against IA objective 16b.
126	Policy EN5	+	We disagree with the IA. The policy as draft incorrectly refers to enabling development and seeks to allocate land which may affect a designated heritage asset. If the Local	Policy EN5 is considered to have a minor positive ('+') effect against IA objective 16b, as it requires development to incorporate diverse green infrastructure that is

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			Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	appropriate to the local landscape and reflective and complementary of the historic character of the area (paragraph 6.401).
143	Policy EN13	++	We disagree with the IA. The policy as drafted does not include a locally specific strategic policy for the historic environment. It also incorrectly references the management of various elements of the historic environment. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	Policy EN13 is considered to have a significant positive ('++') effect against IA objective 16b for a number of reasons. It requires proposals to conserve, enhance or better reveal the significant of an asset (including its setting), giving specific consideration to the siting/location, scale/height, layout and materials, and the re-instatement repair and/or revealing of features, elements and historic fabric, which contribute to the asset's significance and/or character and appearance (paragraph 6.436).
152	Policy EN17	0	We disagree with the IA. The policy as drafted does not include reference to the historic environment. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are development management policies that do not generally contain any wording relating to the protection and enhancement of the historic environment. As such, most receive a negligible effect against IA objective 16b.
158	Policy CC1	0	We disagree with the IA. The policy as drafted does not include reference to the historic environment. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are development management policies that do not generally contain any wording relating to the protection and enhancement of the historic environment. As such, most receive a negligible effect against IA objective 16b.
159	Policy CC2	+	We disagree with the IA. The policy as drafted does not include reference to the historic environment. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are development management policies that do not generally contain any wording relating to the protection and enhancement of the historic environment. As such, most receive a negligible effect against IA objective 16b.
173	Policy ID2	-?	We disagree with the IA. The policy as drafted does not include reference to the historic environment. If the Local Plan is amended as recommended in my comments (see	The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of

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			separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	the IA. These are development management policies that do not generally contain any wording relating to the protection and enhancement of the historic environment. As such, most receive a negligible effect against IA objective 16b.
175	Policy ID3	+-	We disagree with the IA. The policy as drafted does not seek to avoid harm to the historic environment. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	Policy ID3 is found to have a mixed ('+/-') effect against IA objective 16b because it states that development should not have an unacceptable impact on 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. Therefore, while the policy provides some mitigation there is still potential for some adverse effects (paragraph 6.537).