



## **Blackpool Local Plan Part 2: Site Allocations and Development Management Policies**

Statement of Common Ground

Historic England and Blackpool Council

## **1 Introduction**

This Statement of Common Ground (SoCG) between Blackpool Council and Historic England (HE) has been prepared to support the Council's Local Plan Part 2 examination. It has been prepared by both parties and highlights the issues raised by HE during consultation on the Local Plan Part 2 Publication and how Blackpool Council intends to deal with these issues.

## **2 Publication Consultation**

The table below sets out representations made by HE to the consultation on the Publication version of the Local Plan Part 2. Blackpool Council's responses are also set out below including any proposed modifications.

HE Representation	Changes Sought	Council Response	Council Proposed Modification	Historic England response	Council Additional Comment
<p><b>Sustainability Appraisal</b></p> <p>DM10 - In view of our comments on the Local Plan Policy DM10, we disagree with the SA Score (+) that the Policy is likely to have a positive effect on SA Objective 14 on cultural heritage. The proposed policy does not conserve and enhance the historic environment in line with the requirements of the NPPF.</p> <p>DM17 - In view of our comments on the Local Plan Policy DM17, we disagree with the SA Score (o) that the Policy is likely to have a neutral effect on SA Objective 14 on cultural heritage. The proposed policy does not conserve and enhance the historic environment in line with the requirements of the NPPF.</p> <p>DM19 - In view of our comments on the Local Plan Policy DM19, we disagree with the SA Score (++) that the Policy is likely to have a major positive effect on SA Objective 14 on cultural heritage. The proposed policy does not conserve and enhance the historic environment in line with the requirements of the NPPF.</p> <p>DM22 - In view of our comments on the Local Plan Policy DM22, we disagree with the SA Score (+) that the Policy is likely to have a positive effect on SA Objective 14 on cultural heritage. The proposed policy does not conserve and enhance the historic environment in line with the requirements of the NPPF.</p> <p>DM30 - In view of our comments on the Local Plan Policy DM30, we disagree with the SA Score (++) that the Policy is likely to have a major positive effect on SA Objective 14 on cultural heritage. The proposed policy does not conserve and enhance the historic</p>	<p>No changes sought</p>	<p>DM10 - The Policy supports development at the Pleasure Beach and North Pier if the development conserves and enhances the town's heritage assets. By supporting development which enhances heritage assets, the policy would be expected to have a positive impact on the significance of heritage assets in Blackpool. Supporting high quality landscaping a green infrastructure would also be expected to be sympathetic to historical character and further benefit heritage assets in the town. The policy takes into account the social and cultural benefits historic assets can provide.</p> <p>DM17 - As the policy seeks to ensure high quality design, in-keeping with the local character and have regard to heritage assets and features, it would be expected that Policy DM17 would protect the significant of heritage assets as well as have positive impacts on the local landscape and historic character. The policy takes into account the social and cultural benefits historic assets can provide.</p> <p>DM19 - The SA assessment of Policy DM19 has identified major positive effects in relation to SA Objective 14 due to the policy protecting and enhancing views into and within conservation areas and views of nationally and locally listed buildings. By protecting these strategic views, the policy would be expected to protect and enhance the historic character of Blackpool. The policy takes into account the social and cultural benefits historic assets can provide.</p> <p>DM22 - The policy seeks to ensure development proposals have respect to the local character. This would help conserve and enhance the historic</p>	<p>None proposed.</p>	<p>Noted. Please refer to proposed text changes under the respective Local Plan 2 policies.</p>	<p>No additional comment</p>

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<p>environment in line with the requirements of the NPPF.</p> <p>Site HSA 1.7 - In view of our comments on the Local Plan site allocation we disagree with the SA Score (0) that the site allocation is likely to have a neutral effect on SA Objective 14 on cultural heritage.</p>		<p>environment and therefore, takes into account social and cultural benefits historic assets can provide.</p> <p>DM30 - Policy seeks to prevent the loss or harm to archaeological sites, and thereby, would protect them and their settings. This would be expected to have benefits in relation to protecting archaeological features and the historic environment.</p> <p>Site HSA1.7 – This site currently comprises a car park. The Site is nearby to a Conservation Area and other historic assets. The proposed development of 15 dwellings in accordance with other Local Plan policies would be expected to ensure the development is in-keeping with the local historic and landscape character and enhance heritage assets. The proposed development has the opportunity to be of high-quality design and therefore be more fitting to the local surroundings.</p>			
<p><b>HSA1: Housing Site Allocations Site HSA1.7</b></p> <p>The Council has undertaken a Heritage Impact Assessment for the site. Whilst we welcome reference to it, there is no requirement in the development considerations for proposals to be in accordance with the content of it including any mitigation measures.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. It is therefore recommended that the text be amended. This will ensure that it is in line with the requirements of the NPPF.</p> <p>Should Schedule 1 (Page 17) be amended. Historic England will support this policy.</p>	<p>Schedule 1 - Page 17 Bullet 4 (Key Development Considerations) should be amended to read:</p> <p>‘The development of the site should be carried out <b><u>in accordance with the heritage impact assessment which includes</u></b> to an appropriate height and design to enhance those views.’</p>	<p>Schedule 1 has been amended to incorporate the suggested text.</p> <p><b>MainMod28</b></p>	<p>The development of the site should be carried out <b><u>in accordance with the heritage impact assessment which includes</u></b> to an appropriate height and design to enhance those views.</p>	Agree	No additional comment
<p><b>Policy DM1: Design Requirements for New Build Housing Developments - Bullet 2a</b></p>	<p>‘...local character and distinctiveness of a site...’ should be amended to read:</p>	<p>Bullet 2a amended accordingly</p>	<p>a. respond to the topography, local character and</p>	Agree	No additional comment

HE Representation	Changes Sought	Council Response	Council Proposed Modification	Historic England response	Council Additional Comment
Local character and distinctiveness should not just be constrained to the development site but its context and the wider area.	'.....local character and distinctiveness of a <del>site</del> <u>the area</u> ....'	<b>MainMod01</b>	distinctiveness of <del>a site</del> <u>the area</u> and be well integrated into existing development by respecting the established streetscene, building lines and patterns of development, in order to maintain or establish a strong sense of place. Exceptions may be made for housing proposals of high quality and innovative design, which raises the overall design quality of an area and contributes positively to the distinctiveness of a place;		
<p><b>Policy DM9: Blackpool Zoo</b></p> <p>Blackpool Zoo is adjacent to Stanley Park Conservation Area within which is a registered park and Garden, Stanley Park (Grade II*). The NPPF considers Grade II* heritage assets to be of the highest significance and any harm to or loss of these assets (including setting) should be wholly exceptional. Stanley Park is a Grade II* Registered park and Garden. The Council has a statutory duty under the provisions of the 1990 Act to pay special attention to the desirability of preserving or enhancing the character or appearance of its conservation areas.</p> <p>Whilst we welcome reference to the conservation area, the policy needs to be amended to provide further clarification on how these issues will be dealt with. The Policy as written provides a framework for management of any proposals at Blackpool Zoo that may affect a conservation area but fails to mention this highly graded asset and therefore weakens any protection of this asset. It is mentioned in the supporting text (Para 3.100) but not the policy.</p> <p>In view of this, this policy needs to be amended to ensure that it meets the requirements of the NPPF and the 1990 Act</p>	The policy should be amended to read: ' the zoo grounds and of the adjoining Stanley Park Conservation Area <b><u>and Registered Park and Garden</u></b> '	Policy DM9 has been amended to incorporate the suggested text.  <b>MainMod03</b>	Development proposals for lands within Blackpool Zoo as identified on the Policies Map will only be permitted if they preserve or enhance the character and appearance of the parkland setting of the Zoo grounds and of the adjoining Stanley Park Conservation area <b><u>and Registered Park and Garden.</u></b>	Agree	No additional comment

HE Representation	Changes Sought	Council Response	Council Proposed Modification	Historic England response	Council Additional Comment
<p><b>Policy DM10: Promenade and Seafront</b></p> <p>Historic England welcomes the inclusion of a policy which proposes to manage development proposals for the promenade and seafront. However, the policy should be amended to ensure that it safeguards and enhances the heritage assets in this area of the town.</p> <p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.</p> <p>In view of the above, we have the following comments to make:</p> <ul style="list-style-type: none"> <li>• Bullet 1c refers to ‘landmark buildings’. It is unclear how this is defined as it can be interpreted by different elements of its design such as height, materials etc.</li> <li>• Bullet 2 refers to ‘piecemeal’ development. It is unclear how this is defined and how this will be used to help guide the suitability of planning applications in this area. Further clarity in the supporting text should be provided.</li> <li>• Bullet 4: The piers are heritage assets (both designated and undesignated). Whilst we welcome the intention of the policy, proposals for heritage assets are expected to sustain and enhance their significance including setting. This policy incorrectly refers to ‘preserving their character’.</li> </ul>	<p>The policy should be amended as follows:</p> <p>Bullet 1c: deletion of the word ‘landmark’ or definition of it within the supporting text.</p> <p>Bullet 2: additional information in the supporting text on the definition of piecemeal.</p> <p>Bullet 4: Appropriate improvements and development on the pier decks and platforms which underpin the sustainable future of the piers and which <del>preserve</del> <b>sustain and enhance</b> their character <b>significance</b> will be supported in principle.</p> <p>Bullet 5: see comments on Bullet 2.</p>	<p>Comments noted.</p> <p>A foot note is now included to further explain what is meant by landmark feature.</p> <p><b>MainMod05</b></p> <p>With respect to the word piecemeal which the Oxford Dictionary defines as “<i>in an unsystematic way, through partial measures taken over a period of time</i>”, it is not considered necessary to provide dictionary definitions for specific words in the local plan.</p> <p>Point 4 amended accordingly.</p> <p><b>MainMod04</b></p>	<p>New footnote:</p> <p><b><u>A landmark is a building or feature that is easily recognised and that can assist wayfinding</u></b></p> <p>4. Appropriate improvements and development on the pier decks and platforms which underpin the sustainable future of the piers and which <del>preserve</del> <b>sustain and enhance</b> their character <b>significance</b> will be supported in principle.</p>	<p>Agree</p>	<p>No additional comment</p>

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Bullet 5 refers to piecemeal proposals.(see comments on Bullet 2).					
<p><b>Policy DM17: Design Principles</b></p> <p>Historic England welcomes the inclusion of a policy which proposes to manage development proposals for the promenade and seafront. However, the policy should be amended to ensure that it safeguards and enhances town's heritage assets.</p> <p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.</p> <p>2b It is unclear what a feature is? The policy/supporting text would benefit from defining what this is. Does it mean a heritage feature? If so, what is this? In addition, the setting of heritage assets is an important part of their significance and therefore this should be referred to here.</p> <p>3j: An amendment to the text is suggested for clarity as the requirement here - the use of 'and' suggests that both apply. The way it is written is confusing in its application.</p>	<p>The policy should be amended as follows:</p> <p>2b: reference to setting within the policy and also further clarity on the definition of what a 'feature' is in the supporting text.</p> <p>3j: Further clarity to provide information on how the different elements of this policy is to be applied.</p>	<p>It should be noted that Local Plan should be read as a whole including Core Strategy Policy CS8 and Local Plan Part 2 Policies DM26, DM27 and DM28 which specifically cover the historic environment.</p> <p>Point 2b has been amended accordingly.</p> <p><b>MainMod08</b></p> <p>With respect to Point 3j, no changes are proposed. Further clarification of the policy requirements will be provided in the supporting text.</p> <p><b>AdMod04</b></p>	<p>2b. heritage assets and <del>features</del> <u>their setting</u>;</p> <p>3.162 The quality and type of materials used in new development can make a significant difference to the appearance and quality of a building and whether it enhances or detracts from the character of an area. Materials should be carefully selected to ensure they are both fit for purpose in a harsh marine climate, particularly in areas close to the Promenade and that they help the building fit into the surrounding townscape. <u>In order for new development to be as sustainable as possible and to keep as much material out of landfill, wherever possible, materials should be re-claimed or be recycled and should be re-useable or recyclable at the end of the lifetime of the development.</u></p>	Agree	No additional comment
<p><b>Policy DM19: Strategic Views</b></p> <p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the</p>		<p>Comments noted.</p> <p>It is important to protect wider strategic views of Blackpool Tower and the seafront and coastline. Having reviewed the</p>	<p>3.168 <del>Local</del> Strategic views of assets of particular importance such as historic or distinctive buildings <u>and landscapes</u> help to shape the</p>	Agree subject to some suggested word changes:	The Council is content to accept these further suggested changes.

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<p>historic environment. The historic environment should be considered in delivering a number of other planning objectives.</p> <p>The policy proposed to protect and enhance all views without any evidence to support the policy. Without this, it would result in a wide variety of interpretation of what is considered a strategic view.</p> <p>Views are part of the significance of a heritage asset for example Blackpool Tower.</p> <p>The proposed policy does not seek to manage the impact of development on views of the town's heritage assets in line with the requirements of the NPPF on the historic environment. In addition, heritage assets would be covered by the Plan's Historic Environment policies.</p> <p>Bullet 1: The title refers to 'strategic views' but Bullet 1 refers to the need to protect and enhance all views of buildings and features of strategic importance. What is a strategic important building and feature?</p> <p>The bulleted list in its application would result in all views being protected as the areas they cover and the various elements of the built environment, would mean that the policy proposes to protect all views.</p> <p>Bullet 1a: Blackpool Tower is a highly designated heritage asset and as such it is not appropriate to determine significance (i.e. location of the views) without the evidence to support it. This policy attempts to define important views without the evidence to back it up.</p> <p>Bullet 1b: This is another example of a</p>		<p>comments, the policy has been amended accordingly. It is considered that more localised views are covered by Core Strategy Policy CS8 and the heritage DM policies which support proposals that enhance the setting and views of heritage assets.</p> <p><b>MainMod10</b></p>	<p>identity of a place. New development should safeguard and enhance important views of <u>such landmark buildings and landscapes</u>, <del>particularly listed and locally listed buildings and buildings and spaces within Conservation Areas.</del></p> <p><del>3.169 In and around Blackpool Town Centre, views of historic buildings such as (but not limited to) <u>Views of Blackpool Tower and the seafront and coastline</u> the Winter Gardens and the Grand Theatre are particularly sensitive to changes in their setting <u>given that the Tower is the focal point of the Promenade and the seafront and coastline serves as a shop window to the resort.</u> as are new landmark buildings like Festival House and public spaces such as the Tower Festival Headland and St John's Square.</del></p> <p>3.170 This policy aims to enable appropriate development in locations which will enhance Blackpool's offer without detracting from <u>these</u> established strategic views.</p> <p><b>Policy DM19: Strategic Views</b></p> <p>1. Development should protect and enhance views of the following buildings and features of strategic importance:</p>	<p>3.170 This policy aims to enable appropriate development in locations which will enhance Blackpool's offer without detracting from <del>these any</del> established strategic views.</p> <p><b>Policy DM19: Strategic Views</b></p> <p>1. Development should protect and enhance views of the following buildings and <b>key</b> features of <b>strategic importance</b> Blackpool;</p>	



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<p>broad-brush approach to managing views. Rather than strategic views as in title.</p> <p>Bullet 1c: Again, views within and into a conservation area should have been defined, ideally within a conservation area appraisal. It is not clear how this will apply. Reference to conservation area appraisals would support this bullet.</p> <p>Bullet 1d: reference is made to listed buildings here. What about other heritage asset types? Views are part of the significance of a heritage asset and the policy needs to reflect this in its wording. Alternatively, this can be covered by the historic environment policy and can be deleted.</p> <p>Bullet 1e: Again, what is a landmark building and those that assist with wayfinding?</p> <p>Bullet 2: Some of the policy refers to the historic environment. In view of this and therequirements of the NPPF (and the comments above), detrimental impact wouldnot be appropriate. Any views of a heritage asset that is deemed to be part of its significance should be sustained and enhanced and any unacceptable harm avoided. Alternatively, removing reference to the historic environment would avoid this confusion.</p> <p>See suggested amendments within the comments. In addition, there is a lack of a robust evidence base to support this policy.</p>			<p>a. Blackpool Tower – views from the seafront, from the piers and along main transport corridors leading into the Town Centre;  b. along the seafront and coastline;  <del>c. into and within conservation areas;</del>  <del>d. views of listed and locally listed buildings;</del>  <del>e. views of buildings which provide a landmark and assist with wayfinding.</del></p> <p>2. Development that has a detrimental impact on these strategic views will not be permitted.</p> <p>3.171 <u>The seafront and coastline provide the main focal point of Blackpool as a seaside resort and</u> Blackpool Tower is a nationally recognised landmark of significant historical and cultural importance that dominates Blackpool’s skyline. <del>which</del> <u>The Tower</u> can be seen from many locations throughout the town and across the wider Fylde Coast area. Views of the Tower are particularly prominent from the seafront, from the three piers and on main transport routes leading into the Town Centre. <del>New development should be sensitively designed and located so as not to obscure or interfere with</del> <u>views of Blackpool Tower.</u> <del>and take into account the</del></p>	<p>a. Blackpool Tower – <b>including (but not limited to)</b> views from the seafront, from the piers and along main transport corridors leading into the Town Centre;  b. along the seafront and coastline;  <del>c. into and within conservation areas;</del>  <del>d. views of listed and locally listed buildings;</del>  <del>e. views of buildings which provide a landmark and assist with wayfinding.</del></p> <p>2. Development that has an <b>detrimental unacceptable</b> impact on <del>these strategic any</del> <b>identified</b> views will not be permitted.</p>	

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			<p><del>predominant height of surrounding buildings.</del></p> <p><del>3.172 Previous, inappropriate development has damaged views of significant historic buildings in the town such as views of St John's Church in St John's Square and views of the Winter Gardens on the approach from Victoria Street.</del></p> <p><b><u>3.172 New development can make a positive contribution to views of Blackpool Tower and the seafront and coastline but where development is likely to compromise these settings, it will be resisted.</u></b></p> <p>The scale, mass or height of existing buildings and structures which detract from strategic views <del>an important view</del> will not be accepted as a precedent for their redevelopment where there is an opportunity to improve the view with more sensitively scaled and massed development.</p> <p><b><u>3.173</u></b> New development which would improve and enhance strategic views will be supported, subject to other planning policy requirements.</p>	<p><b><u>3.172 New development can make a positive contribution to views of Blackpool Tower and the seafront and coastline but where development is likely to <del>compromise harm these settings views, it will not be resisted</del> supported.</u></b></p> <p>The scale, mass or height of existing buildings and structures which detract from <del>strategic any identified</del> views <del>an important view</del> will not be accepted as a precedent for their redevelopment where there is an opportunity to improve the view with more sensitively <del>scaled and massed designed</del> development.</p> <p><b><u>3.173</u></b> New development which would improve and enhance <del>strategic any identified</del> views will be supported, subject to other planning policy requirements.</p>	

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<p><b>Policy DM22: Shopfronts</b></p> <p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.</p> <p>The policy should be amended to ensure that it is consistent with national policies and legislation on the historic environment.</p>	<p>Applications for new shopfronts and alterations may be subject to listed building consent and therefore, any reference to them should be removed from bullet 3 and 4 of the policy. The inclusion could imply that the other bullets apply to listed buildings when they may not always be appropriate.</p> <p>If Bullet 3 and 4 is retained, then it is suggested that an additional bullet should be included that states that any proposals affecting a designated heritage asset will require Listed Building Consent and will not be subject to the requirements of this policy.</p> <p>Reference to the relevant heritage policy should also be included.</p>	<p>Comments noted.</p> <p>Applications for new shopfronts on designated or non-designated heritage assets or in Conservation Areas should also be assessed against Core Strategy Policy CS8 and Part 2 Policies DM26, DM27 and DM28 which cover the historic environment.</p> <p>It is not considered necessary to set out where Listed Building Consent is required. The Plan should be read as a whole and it isn't considered necessary to cross reference other relevant policies.</p> <p>No change.</p>	<p>None</p>	<p>Agree</p>	<p>No additional comment</p>
<p><b>Policy DM26: Listed Buildings</b></p> <p>Historic England welcomes the inclusion of a policy for Listed Buildings.</p> <p>At the moment the information that is required to be submitted as part of a heritage statement sits outside the Policy within Para 3.257. This should where possible, be included within the Policy (box) attached to point 3, as this will increase its weight in the planning process and ties in with the content of Point 3.</p> <p>This would be consistent with the approach in other policies such as Non-Designated</p>	<p>Policy DM26 should be amended if possible to include the content of Para 3.257 for consistency.</p>	<p>The detailed requirement of a heritage statement is considered to appropriately sit as supporting text.</p> <p>No change.</p>	<p>None</p>	<p>Agree – but note consistency as it is given more weight in DM28</p>	<p>Please note the requirement for a heritage statement is included within policy wording for both DM26 and DM28.</p>

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Heritage Assets (DM28).					
<p><b>Policy DM27: Conservation Areas</b></p> <p>The policy (para 2) refers to heritage asset, but the policy is specifically about conservation areas.</p> <p>Therefore, this should be amended.</p>	<p>Para 2: <i>Heritage asset</i> should be amended to read <i>conservation area</i>.</p>	<p>Point 2 of the policy is specifically related to the impact of a proposal on a heritage asset within the conservation area, hence the reference to the heritage assets. For clarity point 2 has been amended to incorporate the suggested text.</p> <p><b>MainMod13</b></p>	<p>2. Demolition, or other unacceptable harm to the significance of a building or feature that makes a positive contribution to the significance of the Conservation Area, will only be permitted where this harm is outweighed by the public benefits of the proposal. Such proposals must be accompanied by clear details of the proposal and justify the harm in line with national policy through a heritage statement. Where a heritage statement fails to adequately explain and justify the proposal and its impact on the significance of the heritage asset <b>and wider conservation area</b>, this may be used by the Council as grounds to justify refusal of the scheme.</p>	<p>Whilst the proposed modification is acknowledged in response to our representation at Regulation 19 stage, after revisiting the policy wording some further amendments are suggested (red text):</p> <p>2. Demolition, or other unacceptable harm to the significance of a building or feature that makes a positive contribution to <del>the significance of</del> the Conservation Area <b>and its setting</b>, will only be permitted where this harm is outweighed by the public benefits of the proposal. Such proposals must be accompanied by clear details of the proposal and justify the harm in line with national policy through a heritage statement. Where a heritage statement fails to adequately explain and justify the proposal and its impact on the significance of the <del>heritage asset and wider conservation area</del> <b>asset and wider conservation area</b>, this may be used by the Council as grounds to justify refusal of the scheme.</p>	<p>The Council is content to accept these further suggested changes.</p>
<p><b>Policy DM30: Archaeology</b></p> <p>Historic England welcomes the inclusion of a policy for Archaeology.</p> <p>However, the policy should be amended to ensure that it is consistent with national policies and legislation on the historic environment and ensure that there is an appropriate framework for the submission of and management of</p>	<p>Policy DM30 should be amended:</p> <p>Bullet 1 - Development which would result in harm to or loss of the significance of <del>archaeological sites</del> <b>including a scheduled monument (or a site of national significance)</b> will not be permitted unless it</p>	<p>Comment noted. Point 1 has been amended accordingly.</p> <p><b>MainMod14</b></p> <p>The detailed requirement of a heritage statement is considered to be appropriately placed as supporting text. No change.</p>	<p>1. Development which would result in harm to or loss of the significance of <del>archaeological sites including a</del> scheduled monument <b>(or a site of national significance)</b> will not be permitted unless it can be clearly demonstrated that the public benefits which cannot be met in any other way would clearly outweigh the harm.'</p>	<p>Accepted</p>	<p>No additional comment</p>

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<p>applications that affect an archaeological site.</p> <p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment.</p> <p>Bullet 1: suggests that all sites which may include archaeological remains need to demonstrate the public benefits to justify the harm. Para 2 suggests that this is for scheduled monuments (and sites of national significance) and Para 3 states that non- designated archaeology is a material consideration. Which all appear to be in conflict with the position taken in Bullet 1. It is suggested that Bullet 1 be amended to ensure that it is consistent with the rest of the policy.</p> <p>At the moment the information that is required to be submitted as part of a heritage statement sits outside the Policy within Para 3.276 to 3.278. In addition, the information about mitigation and the process for dealing with such sites needs to be included within the Policy.</p> <p>It is suggested that additional bullet points be provided to make reference to the content of the supporting text or the supporting text be inserted into the policy.</p> <p>Without this information, the Policy as drafted does not provide an appropriate framework for managing applications affecting archaeological sites. Therefore, it should be amended.</p>	<p>can be clearly demonstrated that the public benefits which cannot be met in any other way would clearly outweigh the harm.'</p> <p>To include either reference to the content of Para 3.276 to 3.278 (see below) or inclusion of the content itself.</p> <p><b><u>4. Where planning permission is granted for a site where there is known or the potential for archaeological remains, this will be subject to a condition requiring a scheme of archaeological investigation and recording.</u></b></p>				
<p>Para 3.278</p> <p>This supporting text requires substantial public benefits to be applied to all sites</p>	<p>3.278 Where it can be demonstrated that the substantial public benefits of any proposals outweigh</p>	<p>Comment noted. Paragraph 3.278 has been amended accordingly.</p> <p><b>MainMod15</b></p>	<p>3.278 Where it can be demonstrated that the substantial public benefits of any proposals outweigh</p>	<p>Agree</p>	<p>No additional comment</p>

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<p>regardless of their archaeological status. In line with the content of the policy, and suggested amendments, it should be amended for consistency.</p>	<p>the harm to a <del>non-designated archaeological site</del> <b>scheduled monument (or site of national significance)</b>, consideration will be given to the significance of remains and measure sought to ensure mitigation of damage through preservation of the remains in situ as a preferred solution. Where this is not justified, the developer will be required to:</p> <ul style="list-style-type: none"> <li>a) make adequate provision for excavation and recording before and / or during development</li> <li>b) demonstrate how the public understanding</li> <li>c) appreciation of the site can be improved.</li> </ul>		<p>the harm to a <del>non-designated archaeological site</del> <b>scheduled monument (or site of national significance)</b>, consideration will be given to the significance of remains and measure sought to ensure mitigation of damage through preservation of the remains in situ as a preferred solution. Where this is not justified, the developer will be required to:</p> <ul style="list-style-type: none"> <li>a) make adequate provision for excavation and recording before and / or during development</li> <li>b) demonstrate how the public understanding</li> <li>c) appreciation of the site can be improved.</li> </ul>		

## 4 Conclusion

Section 3 above sets out the position of Blackpool Council and Historic England with respect to the representations made by Historic England at Regulation 19 stage. The subsequent position is that there are no outstanding issues between the Council and Historic England in relation to the representations made. The Council is content to accept the further amendments suggested as modifications to the plan by HE if the Inspector is minded to include them.

## 5 Signatories

This statement has been prepared and agreed by the following organisations:

### Blackpool Council

Signature: *E.J. Saleh*

E. Jane Saleh

Head of Planning Strategy

Date: 30 September 2021

### Historic England

Signature: *E. Hrycan*

Emily Hrycan

Historic Environment Planning Adviser

Date: 30 September 2021