

## Appendix A: Table of Historic England’s comments on the Pre-submission East Boldon Neighbourhood Plan (Regulation 16 February 2021)

### Neighbourhood Plan comments

Page	Section	Comments	Suggested Change
26	5.12	<p>Whist we agree there are seven listed buildings within the conservation area, we identify a further three within the plan areas, these are as follows:</p> <ul style="list-style-type: none"> <li>• Gas Lamp to Rear Of Number 6 Garden Lane, Cleadon (we suggest checking the boundaries here to determine whether this is in the plan area or in the neighbouring settlement of Cleadon) ID 1262062</li> <li>• Boldon War Memorial ID 1435093</li> <li>• South Lodge ID 1185760</li> </ul>	Add further three listed building as per column to the left.
26	5.13	The difference between locally listed buildings and locally significant heritage assets here is unclear and needs further explanation. Are the locally significant assets those identified by the Neighbourhood Forum and are they in addition to the 16 locally listed assets identified by the Council.	Differences between locally listed buildings and locally significant heritage assets needs explaining.
26	5.14	Are these nine assets in addition to the 21 identified locally significant heritage assets identified above.	
26	5.15	We support the proposed actions by the Neighbourhood Forum in respect of East Boldon Conservation Area	No change
27	5.20	We support the further additions made to this paragraph.	No change
	EB4	<p>We are in general support of the amendments made to the policy in particular those additions which relate specifically to key considerations for East Boldon Conservation Area.</p> <p>Under criteria c, we suggest replacing prevailing with special, as it is the special architectural or historic</p>	<p>Criteria c. replace prevailing with special</p> <p>Last paragraph, add the list of circumstances as set out by paragraph 195 of the NPPF, for whereby they all apply, that substantial harm may on exception be permitted.</p>

Page	Section	Comments	Suggested Change
		<p>interest for which conservation areas are designated and protected.</p> <p>In the final paragraph, in respect of substantial harm, the paragraph misses out the criteria a-d of paragraph 195 of the NPPF as follows:</p> <ul style="list-style-type: none"> <li>a) the nature of the heritage asset prevents all reasonable uses of the site; and</li> <li>b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</li> <li>c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and</li> <li>d) the harm or loss is outweighed by the benefit of bringing the site back into use.</li> </ul> <p>We would suggest adding these in order that policy is consistent with the Framework, as in exceptional circumstances where all of the above apply there may be reason for permitting development which results in substantial harm.</p>	
40	7.17	We support the additional text in relation to historic shopfronts.	No change
40	EB 12	We support the additional policy requirement under criteria point d.	No change
57	Community Action 3	It is unclear what is meant by reference to reviewing and updating heritage assets. Whilst we are generally supportive of this overall action, there is confusion as to what is meant here. We understand this may not relate to the assets themselves but rather the record of assets including the Historic Environment Record and local list. If this is the case this is the case the text should be clear.	Clarity needs to be provided in reference to updating and reviewing heritage assets.