



Historic England

Planning Policy
Tameside Council

Our ref: PL00796358

Your ref:

Sent via e-mail to:
planpolicy@tameside.gov.uk

Telephone: [REDACTED]

02 June 2025

Dear Sir/Madam,

TAMESIDE LOCAL PLAN – OPTIONS AND PREFERENCES: INTEGRATED ASSESSMENT

Thank you for consulting Historic England about the Integrated Assessment Report for the emerging Tameside Local Plan – Options and Preferences.

In terms of the historic environment, on the whole, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the Tameside Local Plan, that it has established an appropriate baseline against which to assess the Plan's proposals and that it has put forward a suitable set of objectives and indicators. Overall, therefore, we believe that it provides an appropriate framework for assessing the likely significant effects which this plan might have upon the historic environment.

As highlighted in our response to the Integrated Assessment Consultation Document (April 2024), we welcome the inclusion of the topic of the historic environment within SA Objective 16. However, it seeks to deal with the consideration of landscape and townscape as part of the same objective. Whilst often related, these topics need to be dealt with under separate objectives in order to be given proper consideration. As highlighted in Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, a separate and specific objective relating to the historic environment may help avoid the masking of adverse impacts through blending several topics together in one objective.

This opinion is based on the information provided by you in the Integrated Assessment Report dated April 2025 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the Integrated Assessment, have adverse effects on the environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

James Langler



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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





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Appendix A: Table of Historic England’s comments on the Policies in the Yorkshire Dales National Park Local Plan Publication Draft (Regulation 18)

Page	Section	Sound/ Unsound	Comments	Suggested Change
26	About Tameside – 2.32 Places	Sound	This section of the plans introduction provides a helpful brief summary of the historic development of the Borough.	-
32 & 37	3.7 Vision & 4.3 Strategic Objectives	Sound	<p>The historic environment makes an important contribution to the distinctive character of Tameside, to its economic well-being, and to the quality of life of its communities. It is essential, therefore, that the Plan sets out a robust framework for how this resource will be manage, how potential threats to those assets might be addressed, and how Tameside’s historic buildings and areas might be used more positively to help deliver the wider objectives for the Borough.</p> <p>We therefore welcome the aspirations set out in the Vision and Strategic Objective relating to Places. The Vision and Strategic Objectives are clearly and logically set out, relating as they do to chapters within the Plan.</p>	-
90	HSP H4: Back Land and garden Development	Sound	We support the inclusion of criterion 2 which will help to ensure that proposals for back land or garden development do not harm the character of the area.	-
102	HSP J4: The Visitor Economy	Sound	We welcome the intention of the Plan to protect and enhance the tourism function of the Borough. A number of tourist attractions in the Borough, including those listed in	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			paragraph 9.30, involve heritage assets and/or features related to the culture and history of the place.	
110	HSP PE2: Publicly Accessible Green Spaces	Sound subject to detailed policy text	Open space can often contribute positively to the amenity and local distinctiveness of settlements by providing an important and attractive break in the built-up area, or by providing views beyond the immediate street scene that are important to the legibility of an area. In this role, open space can also contribute towards the significance of heritage assets and the historic environment of settlements.	The policy text should ensure that green spaces which are of heritage interest are appropriately protected.
116	HSP PE6: Peak District National Park	Sound	We support the inclusion of a policy considering the potential impacts of development within the Borough on the Peak District National Park.	-
136	Chapter 12: Places	Sound, subject to recommended changes	The NPPF (paragraph 203) requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. Subject to the changes recommended below, the planning policies and justification text of Chapter 12: Places, combined with Policy JP-P2: Heritage of the Places for Everyone Joint Development Plan Document, deliver the require positive strategy for Tameside's historic environment.	-
138-141	Chapter 12: Places (paragraphs 12.1 - 12.15)	Sound	The introductory sections of Chapter 12: Places of the consultation document sets out a useful summary of those elements of the Borough's historic environment that are considered particularly distinctive and important to the character of the place. Section 12.7: You Said provides a clear steer for the plan in terms of its strategy for the historic environment.	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
142	HSP PL1: Archaeology and Scheduled Monuments	Sound, subject to change	Whilst we would generally support the approach taken by draft Policy PL1 we recommend a number of minor modifications to the policy text for clarity, and to bring it in line with the NPPF.	<p>Policy approach HSP PL1 –</p> <p>a) Amend second sentence to read:</p> <p><i>“Development that will result in substantial harm to or loss of significance of, a scheduled monument or other nationally important remains, should be wholly exceptional and will require clear and convincing justification in accordance with national planning policy.”</i></p> <p>b) Amend the start of the second paragraph to read:</p> <p><i>“Where development is proposed on sites which include or have the potential to include non-designated heritage assets of archaeological interest, the Council will...”</i></p> <p>c) Review the wording of criterion 3 to improve its clarity.</p>
146	HSP PL2: Listed Buildings – Alternative Uses, Additions, Demolition and Development within their Setting	Sound, subject to change	Whilst we would generally support the approach taken by draft Policy PL2 we would ask for the reasoned justification to provide more guidance on when and how criterion 6 will be applied regarding protected species.	Amend the justification text to Policy PL2 accordingly.

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150	HSP PL3: Conservation Areas – Managing Development Within or Adjoining	Sound, subject to change	Whilst we would generally support the approach taken by draft Policy PL3 we recommend a minor modification to the policy text in order to bring it in line with the provisions of paragraphs 215 and 216 of the NPPF.	Policy approach HSP PL3 – amend criterion 2 to read: <i>“Proposals for partial or complete demolition of a building or structure, resulting in harm to significance, achieve public benefit sufficient to outweigh the harm caused, and an acceptable alternative form of development can be delivered as soon as practicable.”</i>
152	HSP PL4: Historic Parks and Gardens – Managing Development	Sound, subject to change	Whilst we would generally support the approach taken by draft Policy PL4 we recommend a minor modification to the policy text to bring it in line with the provisions of paragraphs 215 and 216 of the NPPF. Reference should be made in either the policy or justification text to the consideration of Conservation area Appraisal and Management Proposal documents, where they exist, in decision making.	Policy approach HSP PL4 – amend criterion 1.b. to read: <i>“Where applicable, any harm or loss of significance by way of alteration or demolition can be clearly justified, exceptional circumstances exist, and public benefits sufficient to outweigh the harm caused will be achieved.”</i> Reference should be made in either the policy or justification text to the consideration of Conservation area Appraisal and Management Proposal documents, where they exist, in decision making.
154	HSP PL5: Designated Heritage Assets – Energy Efficiency and Renewable Energy Generation	Sound	We support the approach taken by this policy. Sympathetically upgrading and reusing existing buildings, rather than demolishing them and building new, can dramatically improve a buildings energy efficiency and make substantial energy savings because of the CO2 emissions already embodied within existing buildings that would be lost through demolition.	-

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			<p>When improving the energy efficiency of existing buildings, particular care needs to be taken in the case of historic buildings and those of traditional construction. For historic buildings a balance needs to be achieved between improving energy efficiency and avoiding damage, both to the significance of the building and its fabric. However, improving energy and carbon performance may also provide an opportunity to protect and enhance a historic building and ensure that it remains viable into the future.</p> <p>The evidence available on adaptation and mitigation in the built environment is vast and growing but incomplete. Much of the knowledge base relates to the built environment in general and less to the historic environment specifically. Historic England has compiled and commissioned a wealth of information on energy efficiency and retrofitting and on embodied carbon, which is available on our website, we have also published an advice note on Adapting Historic Buildings for Energy and Carbon Efficiency: https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/</p>	
156	HSP PL6: Designated Heritage Assets and Enabling Development	Unsound	<p>By definition within the NPPF enabling development is development that is not otherwise in accordance with adopted policy. Paragraph 221 of the NPPF states:</p> <p>Local planning authorities should assess whether the benefits of a proposal for enabling development, which</p>	Do not include a policy on enabling development in the Plan.

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			<p>would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.</p> <p>Historic England is therefore of the view that a separate policy on enabling development is not a necessary component of a development plan document. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy.</p>	
156	HSP PL7: Non-Designated Heritage Assets	Sound	We support the approach taken by this policy and the intention for the authority to develop a local list. It should be noted, with regards to criterion 1.c, that non-designated heritage assets can also be identified as part of the plan making process when undertaking assessments or site option and allocating sites.	-
158	HSP PL8: Landscapes, Townscape and Urban Form	Sound	<p>We support the approach proposed by this policy. An understanding of context, including the history, culture and the character of an area, is one of the ten characteristics set out in the National Design Guide which contribute towards the delivery of well-designed places. Paragraph 35 of the National Design Guide states that: “All local design policies, design guides and codes will need to set out a baseline understanding of the local context and an analysis of the local character and identity”. The principle that design should be informed by an assessment of the characteristics of the site and its surroundings is further emphasised within the National Model Design Code.</p> <p>Historic England’s website contains a range of information on design in the historic environment that the authority</p>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			may find useful during the preparation of urban design codes: https://historicengland.org.uk/advice/planning/design-in-the-historic-environment/#6648a1aa	
160	HSP PL10: Design of All Types of New Residential Development	Sound	We support this policy approach, in particular criteria 4, 6 and 12.	-
162	HSP PL11: Design of Residential Additions, Alterations and Extensions	Sound	We support this policy approach, in particular criteria 3 and 2.	-
164	HSP L12: Design of Employment Sites	Sound	We support this policy approach, in particular criteria 4, 6 and 10.	-
166	HSP PL13: Design within Centres, Retail and Leisure Developments	Sound	We support this policy approach, in particular criteria 6 and 8.	-
168	HSP PL14: Design of Commercial Frontages	Sound	We support this policy approach, in particular criteria 1, 2 and 4.	-
170	HSP PL16: Design and Enhancement of the Waterside	Sound	We support this policy approach, in particular criteria b, c and d.	-
172	HSP PL17: Design of Public Realm and Urban Space	Sound	We support this policy approach, in particular criteria e, f and g.	-

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02 June 2025

Dear Sir/Madam,

CONSULTATION ON THE TAMESIDE LOCAL PLAN – OPTIONS AND PREFERENCES CONSULTATION

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England about the Tameside Local Plan – Options and Preferences Consultation. Our comments are set out in **Appendix A**.

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

Yours sincerely

James Langler

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