



Ms Karen Allott
Saddleworth Parish Council

Direct Dial: 0161 242 1445

Our ref: PL00795731
10 June 2024

Dear Ms Allott

Saddleworth Neighbourhood Plan Consultation

As the public body that advises on England's historic environment, we are pleased to offer our comments on the draft Saddleworth Neighbourhood Plan.

The area contains designated heritage assets (such as listed buildings, registered parks and gardens, scheduled monuments or conservation areas). The plan area is also likely to contain many other features of local historic, architectural or archaeological value. The planning and conservation staff at Oldham Council are best placed to assist with the development and refinement of your plan in relation to the historic environment. However, we do offer our general advice below.

If you have not already done so, we also recommend that you also speak to the staff at GMAAS who manage the Historic Environment Record (HER, formerly SMR). They should be able to provide up to date details of locally important buildings, archaeological remains and landscapes as well as designated heritage assets.

To ensure that the protection and enhancement of the historic environment is fully embedded within the draft Saddleworth Neighbourhood Plan, we recommend that you refer to our advice on neighbourhood planning, and particular our *Neighbourhood Planning and the Historic Environment Advice Note No. 11* (HEAN11) and our 4 information sheets, which are available on our website here:

<https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/> This should be the first port of call for advice on heritage in neighbourhood plans.

Our full suite of planning advice and guidance notes can be found here:

<https://historicengland.org.uk/advice/planning/planning-system/> Other advice that you may find of use include:

- HE Advice Note 2 - Making Changes to Heritage Assets (HEAN2):
historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/ <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>
- HE Good Practice Advice in Planning 3 - The Setting of Heritage Assets (GPA3):
historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
[HistoricEngland.org.uk](https://historicengland.org.uk)



assets/

- HE Advice Note 7 - Local Heritage Listing (HEAN7): [historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7](https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7) <<https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>>
- HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment (HEAN8): historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ <<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>>

The National Planning Policy Framework (NPPF) indicates that plans should set out a positive strategy for the conservation and enjoyment of the historic environment (para 196) and can include detailed policies on conserving and enhancing the historic environment and establishing design principles (para 28).

It is important that your plan identifies heritage assets in the area and includes a positive strategy to safeguard those elements that contribute to their significance. This will ensure they can be appropriately conserved and enjoyed now and in the future.

The plan might, for example, address the following:

- Consider how the plan's objectives can be achieved by maximising the wider social, cultural, economic and environmental benefits of the area's heritage, e.g. regeneration, tourism, learning, leisure, wellbeing and enjoyment.
- Locate new development to protect the significance of heritage assets and their settings.
- Give detail on the expected scale, density, massing, height, landscape, layout, materials and access of new development.
- Offer solutions to heritage assets that are at risk from their condition or vacancy; or are vulnerable to becoming so during the life of the plan. The national register does not ordinarily cover Grade II listed buildings or non-designated heritage assets, so your plan could usefully consider whether there are any are at risk.
- Consider how the significance of heritage assets can be enhanced.

As well as designated heritage assets, your plan presents an opportunity to include a positive strategy for local heritage assets (these may include buildings, monuments, sites, places, areas, landscapes or views that are important to the local community for their heritage value). Government's National Planning Practice Guidance (PPG) is clear that neighbourhood plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale.





The strategy and policies in your plan should be based on proportionate, robust evidence. For heritage this might include: characterisation studies, historic area assessment, conservation area appraisals or archaeological appraisal, for example. Rather than just the presence or absence of heritage assets, evidence should focus on what makes them significant and, where relevant, vulnerable.

In terms of the plan's policies, rather than re-writing higher-level policy, we suggest that neighbourhood plan policies add local depth to their application. For example, setting out specific themes, characteristics or features to be protected, or what measures would be acceptable to mitigate the impact of development that higher-level policy might allow. Policies can set out good design principles, local characteristics and appropriate materials to which new development will be required to respond. Paragraph 132 of the NPPF supports this, saying that neighbourhood planning groups can play an important role in identifying the special qualities of the area and explain how this should be reflected in development.

We also recommend that you familiarise yourself with the terminology of historic environment planning (such as "historic environment", "conservation", "significance", "heritage asset", and "setting") by referring to the glossary in the NPPF; and ensure that your plan maintains consistency with the terminology used in the NPPF. We also suggest copying these and other terms across to your plan's own glossary.

Finally, and to avoid any doubt, this guidance does not reflect our obligation to provide further advice on, or potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

Thank you for providing Historic England with the opportunity to comment.

Yours sincerely,

Pippa Brown
Historic Places Adviser
Pippa.Brown@historicengland.org.uk

cc:

