

PDNPA comments on Saddleworth Neighbourhood Plan at Regulation 14

Saddleworth Neighbourhood Plan		PDNP comment on Reg 14 consultation version	corresponding PDNP Policy
General point – policies should be in a box and should be numbered rather than bullet point to make it easier to refer to them			
Page/policy/para	Extract	n/a (means the Neighbourhood Plan has stated the policy is not applicable to the PDNPA area of the Neighbourhood Plan)	
Page 12	The Parish Council covers an area with a number of sensitive environmental assets. However, a large proportion of the area of the Parish Council falls within the Peak District National Park, where the Peak Park Management and Local Plans are the relevant planning documents for development.	<p>The Parish Council covers an area with a number of sensitive environmental assetsand in addition to this a large proportion of the area of the Parish Council falls within the Peak District National Park.</p> <p>The PDNP Management Plan is not a planning document. It sets the direction for the Local Plan which currently consists of the Core Strategy (2011) and Development Management Policies (2019).</p>	Core Strategy policy GSP1,L1,L2,L3
Page 12	<p>The planning policies for the Peak District National Park are found in the Development Plan which consists of the Core Strategy (2011) (https://www.peakdistrict.gov.uk/planning/policies-and-guides/core-strategy) and the Development Management Policies (DMP) Document (2019) (https://www.peakdistrict.gov.uk/__data/assets/pdf_file/0024/95091/Webpage-Final-Branded-DMP-Doc-Copy.pdf).</p> <p>Other plans and guidance (which can be found on their website) include the Management Plan, Corporate Strategy 2019–24, the Landscape Strategy, Climate</p>	<p>The Authority Plan 2023-28</p> <p>Strategies and policies: Peak District National Park</p>	

	Change and the Peak District National Park, and the Cultural Heritage Strategy.	The Cultural Heritage Strategy is no more – it has been assimilated into the Landscape Strategy.	
Page 14	The policies and recommendations contained within this document must be viewed as a whole, and with the other plans and policies listed on page 12, most specifically Places for Everyone and the Oldham Local Plan.	Please add PDNP Local Plan to the end of this sentence.	
Policy 1: Green infrastructure	<p>All developments should aim to deliver:</p> <ul style="list-style-type: none"> • the appropriate provision of new small open and/or green spaces, in line with identified needs/deficiencies such as pocket parks and active green spaces (e.g. green walls and green roofs) and their maintenance, and an overall enhancement in the provision of green infrastructure and/or open spaces;² • a positive impact on the relationship between urban and natural features, where the development is adjacent to existing green spaces, so that it integrates positively with any natural features (for example, this would include green corridors such as canals and former railway lines); • protect and enhance any existing wildlife, particularly by keeping features that support existing wildlife, providing alternatives where there are overriding reasons for their removal, and incorporating new supporting provision in new buildings and across the development. This is in line with the mitigation hierarchy as set out in national planning policy and local plans; and • support wildlife movement and foraging through, for example, the provision of green infrastructure such as native hedgerow and tree planting (or additional species which have been agreed to 	Where are the identified needs and deficiencies – would planners making decisions have the evidence to justify putting this into practice?	

	<p>provide greater diversity and resilience), and the use of wild flower planting in areas of green spaces.</p> <p>Development must respect the need for increased tree coverage in the Saddleworth lowlands, and in particular encouraging the expansion of native species across the district.</p> <p>Developments will not be supported which:</p> <ul style="list-style-type: none"> • do not meet Oldham Council’s target provision for the replacement of trees; • do not create or enhance existing green space, and fail to replace any loss of green space with an equal or greater new provision of green space; • would result in the loss of or harm to Ancient Woodland. <p>If a development replaces a lost green space with a replacement which creates a new requirement on the local authority to manage, provision should be made to maintain the site without additional impact on the public purse.</p> <p>The South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC) are of particular importance in Saddleworth. Development is required to meet policies within PFE and Oldham Council’s Local Plans which address recreational impacts on the SAC/SPA, including any “functionally linked” lands.</p> <p>Any specific proposals for facilitating tourism or tree planting are required to be assessed at a project level for any significant likely effects on the special interest</p>	<p>Where are the lowlands?</p> <p>Is this written to just apply to Oldham’s area?</p> <p>Mitigation strategies need to be joined up between the responsible authorities and interested groups. Co-ordination and working with partner organisations is key for strategies to be effective. See Natural England report on the Recreational Use of the South Pennines Moors and implications for strategic housing growth (Footprint Ecology 27th March 2024).</p>	
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	<p>of designated sites. Developments which fail to do so, or which do not mitigate against such impact will not be supported.</p> <p>In the SPA/SAC specific mitigation at a project level may include requiring dogs to be on leads and the provision of advice for avoiding fire risks.</p>		
Policy 2: Character and quality of land adjacent to the National Park	Development must respect the setting of the Peak District National Park (the indicative area adjacent to the National Park as shown in Map A)6 by being sensitively located and designed so as to avoid or minimise adverse impacts on the National Park.	Welcome the policy. The Inspector is likely to ask for a more detailed map. Which colour on the map is the policy referring to?	
Para 20	20. Section 62 of the Act also places a general duty on all relevant authorities to have regard to these purposes.	LURA 2023 amended the National Park and Access to the Countryside Act 1949 to state that in exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, a relevant authority must seek to further national park purposes.	
Policy 3 : conversion of agricultural buildings (barn conversions)	<p>A proposal for change of use of agricultural buildings or stables will be supported if it is deemed to have no detrimental impact on the agricultural economy, nor on the openness and people's enjoyment of the open countryside.⁹ Developments will be supported which can demonstrate the following:</p> <ul style="list-style-type: none"> • if brought into use later than 20th March 2013, the applicant shall demonstrate that the building has been in active use for the approved purpose and for no other purposes for a minimum of seven years; • the building footprint or height does not increase substantially, in line with Oldham Council's Local Plan definition; 	I think it was agreed that this policy wasn't going to relate to the PDNP?	

	<ul style="list-style-type: none"> • ecological surveys should be carried out and developments should consider incorporating green infrastructure to support biodiversity and preserve existing wildlife; • adequate screening by appropriate features such as tree planting, hedge planting and drystone walls or the provision of such features. 		
Policy 4; Protection of important views	Development proposals which will detract or harm a valued viewpoint through interruption of key identified views or through inappropriate development by virtue of its design will not be supported unless there is a clear and convincing justification.	Are there specific viewpoints identified (Whaley Bridge has an example)	
Policy 5: Erosion and flooding	Developments will be supported which avoid exacerbating flood risk and make use of natural techniques to minimise and mitigate flood risk, such as Slow the Flow initiatives on tributary streams and catchment areas, or “wilding” initiatives to create a natural sustainable drainage systems (SUDS). Development in flood risk areas will only be permitted in line with national and local plan policy requirements, subject to a satisfactory Flood Risk Assessment, which identifies appropriate mitigation for the site.	Does this add anything to national/local policy?	
Policy 6: Sustainable construction	Developments must aim to: <ul style="list-style-type: none"> • deliver modern standards of design and construction, where appropriate, to minimise the environmental impact of the construction process. Where modern approaches are not used – for example, to match historic building methods – efforts must still be made to minimise this impact; 	n/a to PDNP	

	<ul style="list-style-type: none"> • meet or exceed national environmental guidelines and recommendations, or requirements set out in Places for Everyone for zero-carbon homes across their lifetimes; <p>Developments will be particularly supported which include, where appropriate, small-scale and/or district13 energy provision, including but not limited to solar power, hydropower, and the development of a local energy plan.</p> <p><i>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park.</i></p>		
<p>Policy 7: Design, character and heritage</p>	<p>Good design is indivisible from good planning. Development that enhances or preserves Conservation Areas and heritage assets in the area – as well as their distinct character, appearance, and setting – will be supported. There is a strong presumption in favour of developments which retain existing heritage assets and their setting, to the fullest extent. Any proposal that incorporates the partial or full loss of a heritage asset must demonstrate why the reuse of the asset is not applicable, through the submission of a detailed Heritage Statement and accompanied structural/condition and viability surveys to justify the extent of harm.</p> <p>All development in Saddleworth should be of a high quality of design. The design should complement and enhance the distinct local character and identity of Saddleworth’s villages.</p>	<p>n/a to PDNP</p> <p>Parts of this don’t read like a policy</p>	

(See supporting information for examples of the types of existing design and context that have been identified in Saddleworth.)

This shall be achieved by, for example:

- the use of distinctive local building materials, to ensure complementary and sympathetic design to enhance or better reveal the distinct Saddleworth vernacular, with particular regard given to the design and materials used in weavers' cottages and associated mill buildings;
- a presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context. In particular, extensions and infill development should respect and be sensitive to their context and settings;
- taking into account the context of listed buildings, conservation areas, scheduled monuments and their settings, along with significant views (see policy 2).

Whilst OPOL (and future local green spaces) and other types of protected status should also be considered;

- Proposals which substantially harm the special character, and/or architectural and/or historical significance, and setting of Conservation Areas, heritage assets, and adjoining vernacular styles in the area will not be supported;
- the provision of associated high-quality public realm;
- account will be taken of the Local Heritage List designations (once adopted) when considering planning and development.

Particular weight will be given in favour of developments which incorporate environmental technology in a way which is complementary to the

	<p>heritage of the area. <i>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park.</i></p>		
<p>Policy 8: Design masterplans</p>	<p>With particular regards to large redevelopment sites (100+ houses), a comprehensive masterplan should include an indication of how the development should be phased. This should be developed with the opportunity for timely participation from the local community.</p> <p>In all circumstances, masterplans must:</p> <ul style="list-style-type: none"> • be in accordance with a comprehensive phasing and infrastructure delivery plan. • create buildings, spaces and streets which positively reflect and respond to the local landscape, townscape and historic character. • create integrated, accessible and sustainable transport systems with walking, cycling and public transport designed to be the most attractive forms of transport and effectively linking into the surrounding areas. • provide a clear structure and hierarchy of pedestrian friendly streets and well-connected footpaths and cycle ways integrated with the wider built and natural environment and communities. • plan for integrated and mixed-use communities with walkable locally accessible community, employment and retail facilities. • positively integrate with adjacent communities and positively contribute to their character and the way the area functions, including addressing infrastructure matters. 	<p>Major development is not appropriate in the National Park other than in exceptional circumstances. It may be pertinent to state this somewhere in the text of the document so that this position is clear.</p> <p>Do you mean to state..</p> <p>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park.</p>	<p>Core Strategy Policy GSP1.</p>

	<ul style="list-style-type: none"> • provide a diverse and distinctive range of flexible and adaptable house types, tenures and building forms to meet the differing needs of the population. • create an accessible multi-functional green infrastructure network. 		
Policy 9: Chew Brook Vale	The former Fletcher's Mill site in Greenfield is designated in Places for Everyone as JP Allocation 15 Chew Brook Vale.	See PDNPA comments made regarding this site as part of the Places for Everyone consultation.	
Policy 10: Safety and Wellbeing	<p>Major developments should aim to deliver:</p> <ul style="list-style-type: none"> • new and/or enhanced spaces which deliver routes for active travel. Particular priority is given to spaces which are developed with an awareness of the benefits for physical and mental health that good design can deliver. Developments will be supported which can demonstrate clear improvements for wellbeing, for example, by having an impact on reducing social isolation; • new public realm that is well-designed, safe, accessible, inclusive, easy to understand, well-connected and related to the local and historic context. Where new public realm is created that could provide a risk of anti-social behaviour, applications must be supported by a Crime Impact Assessment. 	<p>Major development is not appropriate in the National Park other than in exceptional circumstances. It may be pertinent to state this somewhere in the text of the document so that this position is clear.</p> <p>Do you mean to state..</p> <p>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park.</p>	Core Strategy Policy GSP1.
Policy 11: Health, social care and education	<p>Development will be required to provide or contribute to health, social care and education infrastructure made necessary by that development or where it gives rise to the need for additional or improved infrastructure to mitigate its impact on existing provision.</p> <p>The required infrastructure should be provided at the appropriate time during the construction of the</p>	Does this add anything to Oldham's developer contributions policy?	

	<p>development. It should normally be provided prior to the development becoming fully operational or occupied unless it is demonstrated that this will not have an unacceptable impact on the amenity of residents or occupiers within and adjacent to the development.</p> <p>Developments will be supported in particular which can provide or contribute to:</p> <ul style="list-style-type: none"> • increased accessibility to education, social care and healthcare for isolated or inaccessible communities, • mitigation of any impacts from the development on education and healthcare, • where required, deliver appropriate provision for healthcare and education support, either through facilities as part of the development, or by section 106 agreements. In particular, this should cover: new school places, health care facilities, public transport facilities, and new community facilities where there is an identified need; <p>Major developments would be requested to provide a report about what local healthcare provision exists, how accessible it is to the development (with particular regards to the preference for 20 minute neighbourhoods and public transport access), and what impact the development will have on the number of people accessing that healthcare provision, with a view to enabling an informed decision</p>		
Policy 12: Housing	Development will be supported which delivers a range of housing types, with specific focus on the provision of affordable, social and intermediate	n/a to PDNP	

	<p>housing. In particular, preference will be given to developments which include one-bedroom accommodation targeted at young people, allowing those leaving family homes for the first time to remain in the area, and appropriate homes for the elderly and disabled, which promote accessibility. Individual developments which fit those needs will also be looked upon favourably.</p> <p><i>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park.</i></p>		
Policy 13: Consultation	<p>Major developments should have as a condition of their approval, the formation of a consultation group with local residents and groups, to discuss the development between planning approval and completion.</p> <p>Development should facilitate positive and proactive engagement with the community by those bringing forward plans for development, both as plans are prepared and submitted, and as development takes place. In support of this, all planning applications for development which are likely to have an impact beyond the immediate site should be accompanied by a Statement of Community Engagement.</p>	n/a to PDNP	
Policy 14: Derelict and empty properties and sites	<p>Developments will be supported which bring derelict/empty properties back into use.¹⁶</p> <p>The Local Plan for Oldham has a specific policy to make the most efficient use of brownfield land, which is strongly supported for development in Saddleworth.</p> <p><i>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park.</i></p>	n/a to PDNP	

<p>Policy 15: Community and self-build sites</p>	<p>Developments will be particularly supported which are for individual self-build or community led projects, where they:</p> <ul style="list-style-type: none"> • demonstrate that they have a local connection (see below)17; and • include as a condition that the occupancy of the property will be restricted to people with a local connection; and • undertake in an agreement that they will live in the property as their main residence once it is complete; and • undertake an agreement that once the development has commenced, they will complete the building of the dwelling within two years. <p>Planning obligations (section 106 agreements) and/or planning conditions will be used to ensure these requirements are fulfilled as appropriate.</p>	<p>This policy needs to align to PDNP local connection test (see DMH2 and DMH3 in Development Management Policies)</p>	<p>Policies DMH2 and DMH3 in Development Management Policies</p>
<p>Policy 16: Retail, Commercial and Industrial Development</p>	<p>New office, retail and commercial development19 will be supported within existing or new employment areas subject to the following criteria:</p> <ul style="list-style-type: none"> • the scale and nature of the proposals would not have significant harmful impacts on the amenities of adjoining sites; • the scale and nature of the proposals would not have an unacceptable impact on existing commercial activity on adjacent land, including agricultural activity; and • the proposal would not have unacceptable impacts on the local road network, particularly in respect of the volume of HGV traffic. 	<p>n/a to PDNP</p>	

	<p>Transport assessment or statements should be provided in line with the requirements of <i>Places for Everyone</i> (see Travel and Transport section). In addition to site allocations in the Local Plan for Oldham, proposals will be supported which result in</p> <p>the creation or sustainable expansion of existing and new businesses, particularly those defined as micro (sole traders or those with fewer than ten employees) or small (ten to fifty employees). Such proposals will be supported where the following all apply:</p> <ul style="list-style-type: none">• The site is located outside the Green Belt or the development is acceptable in terms of national Green Belt policy;• The proposal supports new business investment or the expansion of an existing business;• The site is large enough to accommodate car parking, including electric vehicle charging points (or other renewable technology), service areas and landscaped areas appropriate to the scale of the business;• The proposals recognise the overall aim to reduce carbon emissions and congestion through sustainable design and promoting access by walking, cycling and public transport. <p>Development is preferred which involves the re-use of existing buildings. Where re-use of the existing buildings is not possible, redevelopment of those sites would then be considered.</p> <p>There will be a strong presumption against the loss of commercial premises.²⁰</p> <p>The Local Plan for Oldham provides the criteria</p>		
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	<p>for change of use around viability, marketing and regeneration benefits. In Saddleworth, as part of the marketing assessment, we would expect to see that land has not been in active use for at least 12 months, and that the marketing campaign would be for a continuous period of six months.</p> <p><i>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park.</i></p>		
<p>Policy 17: Homeworking and connectivity</p>	<p>Proposals which promote the role of homeworking within the economy will be supported.²¹²² Development proposals should incorporate suitable infrastructure to support integrated communication technologies, providing for future improvements in technology so far as possible. Developers should be encouraged to review and improve this throughout the design and build process.</p> <p>Development will be supported which allows houses to be used flexibly, currently or in the future, to allow for homeworking.</p> <p>New developments will be supported which make provision for homeworking, through provision of high quality broadband and telecommunications.</p> <p>On sites allocated for residential development in the Local Plan for Oldham or Places for Everyone, and on all other new buildings, all properties should be served by superfast broadband (fibre optic) connections²³, unless it can be demonstrated through consultation with providers that this would not be either possible or practical.</p>	<p>Home working is supported provided that it is at an appropriate scale.</p>	<p>E1: Business development in towns and villages</p>

<p>Policy 18: Tourism and Leisure</p>	<p>Development of new tourist facilities will be supported where it contributes to the following criteria:</p> <ul style="list-style-type: none"> • it contributes to the spread of tourism across the whole of Saddleworth, in particular by making additional locations for tourism more accessible; • it seeks to address needs at or close to the site, for example, the provision of parking; • it creates a balance of provision, for example a mix of long-stay and short-stay tourism (with associated benefits for the local economy); • it develops new facilities which also are available for the benefit of the local community, in particular if they can be demonstrated to meet a need in local provision; • it is appropriate to the surrounding landscape character; • it supports local employment opportunities. <p>Developers will be asked to provide a statement outlining how any amenity and recreation impacts will be managed, appropriate to the scale of the application.</p> <p>Development of community, leisure and sports facilities which contribute to the improvement of the health and well-being of the population will be supported.</p> <p>Development proposals which enhance or improve existing community facilities will be supported.</p> <p>Proposals which offer the following types of community activities will be particularly welcome:</p> <ul style="list-style-type: none"> • opportunities to develop social networks for people who are isolated; 	<p>n/a to PDNP</p>	
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	<ul style="list-style-type: none"> • promoting community-based healthcare and wellbeing; • promoting adult learning opportunities; • promoting early years activities for parents, carers and children; and • food and craft markets. <p>Development proposals that will result in the loss or reduction in scale of a community facility will be resisted unless:</p> <ul style="list-style-type: none"> • alternative facilities of equal or better accessibility, size and suitability are provided; or • it can be demonstrated that the community facility is no longer viable. <p>Please note the transport section with regards to the provision of walking and cycling routes, pages 39–43.</p> <p>Please also note the section on heritage, and in particular the policy on protected views, page 16, and recommendation on local list designations (page 23).</p> <p><i>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park.</i></p>		
Policy 19: Agricultural land	There will be a strong presumption against the loss of the best and most versatile agricultural land.		
Policy 20: Services	Developments will be supported which make provision for or allow for the retention of key services within individual village centres, in particular supporting the model of 20-minute neighbourhoods.	Generally supportive of this approach. It will help to maintain the viability and vitality of communities. It also is supported from a sustainable travel perspective.	DMS1 Shops, professional services and related activities in Core Strategy

			<p>policy DS1 settlements</p> <p>T1: Reducing the general need to travel and encouraging sustainable transport</p>
<p>Policy 21: Parking Standards for Housing</p>	<p>New housing development should aim to deliver:</p> <ul style="list-style-type: none"> • provision for two parking spaces per dwelling. <p>The exception to this would be new one-bedroom housing, which would make provision for one parking space per property, or in the case of houses in multiple occupancy, one space per tenant;</p> <ul style="list-style-type: none"> • provision of visitor car parking, with a ratio of 0.5 spaces per dwelling, in line with the preferred design guidelines encouraging off-road parking; • provision for cycle parking, including secure lockable storage facilities. <p>Any major developments where this level of provision is not being proposed will need to demonstrate how high accessibility²⁴ will mitigate the requirement for this, particularly in relation to the relatively low provision of public transport across the area.</p> <p><i>This policy does not apply to that part of the neighbourhood area that is within the Peak District National Park. Peak District National Park parking</i></p>	<p>Generally supportive, on the basis that the requirement to abide by the Peak District National Park Parking Standards within the National Park is highlighted.</p>	<p>DMT8 Residential off-street parking</p> <p>Peak District National Park Parking Standards (Appendix 9 Peak District Development Management Policies (2019))</p>

	<i>standards can be found in Appendix 9 of the Development Management Policies (DMP) document, and are the relevant standard for developments in the National Park.</i>		
Policy 22: Cycling, Equestrian and leisure infrastructure	<p>Major developments should include cycle and pedestrian access, and where there is limited vehicle access, additional measures should be provided. For commercial development, additional facilities should be included, such as indoor changing, shower rooms, and drying rooms (which should be accessible, easy to use, and secure).</p> <p>Developments which improve existing cycling and pedestrian infrastructure will be supported, particularly those which join together routes which are currently separated.^{25, 26}</p> <p>Public realm works which improve the provision of safe cycle parking points in all villages and at key sites will be supported.</p>	Generally supportive.	<p>T2: Reducing and directing traffic (Part F)</p> <p>T6: Routes for walking, cycling and horse riding, and waterways</p> <p>DMT5: Development affecting a public right of way</p>
Policy 23: Accessibility to Transport	<p>Development will be supported which delivers:</p> <ul style="list-style-type: none"> • easy access to existing public transport (within recommended guidelines for distances to bus or train stops); • high-quality pedestrian and cycle access design for major developments. In particular, designs which complete existing gaps in the provision of cycling and pedestrian infrastructure will be supported, creating safe and convenient continuation the Bee Network; 	Generally supportive within the context of National Park policy and National Park Purposes & Duty	<p>T1: Reducing the general need to travel and encouraging sustainable transport</p> <p>T2: Reducing and directing traffic (Part F)</p>

	<ul style="list-style-type: none"> • safe, accessible, secure cycle storage and facilities (i.e. showers); • improved accessibility for walking, wheeling and cycling. 		<p>T6: Routes for walking, cycling and horse riding, and waterways</p> <p>DMT5: Development affecting a public right of way</p>
Policy 24: Public transport	Development which addresses the accessibility restrictions at Greenfield Station will be supported. Developments which would increase the capacity and usage of the rail network in Saddleworth will be supported, where they comply with other policy requirements, including the enhancement of Greenfield Station and the provision of additional stations in the Parish.	Generally supportive, any additional station provision within the National Park would be subject to a Major Development Test and may not be supported.	DMT4 Railway construction
Policy 25: Clean Fuel Vehicles	Development will be supported which delivers provision of electric charging (or alternative renewable provision) unless it can be demonstrated that this is not practical. Where this is not practical, the developer should demonstrate the provision of additional access to alternative travel means.	Generally supportive.	<p>No equivalent policy, but has elements of the Travel Plan policies: -</p> <p>T2: Reducing and directing traffic (Part F)</p>