Saddleworth Neighbourhood Plan: Summary of the Representations Submitted to the Independent Examiner

Saddleworth Neighbourhood Plan was submitted to Oldham Council and the Peak District National Park Authority on 11th November 2025, and a period of consultation took place between 10th June and 24th July 2026. During this time, any interested parties were invited to comment on the plan and supporting documents, in line with the Neighbourhood Planning Regulations (Regulation 16).

Table 1 below summarises the main issues that were raised during the Regulation 16 consultation. 18 representations were received; the full representations were submitted to the Independent Examiner and can be viewed on the Council's website at: www.oldham.gov.uk/info/201235/neighbourhood_planning/2936/saddleworth_neighbourhood_plan

Table 1: Summary of main issues raised in relation to the Saddleworth Neighbourhood Plan Regulation 16 consultation:

Representor ID	Name	Organisation	Summary of main issues raised
001	Shivam Sagwal	National Highways	No comments or issues raised.
002	Evie Poxon	Fisher German LPP on behalf of National Grid Electricity Transmission (NGET)	Identified one NGET asset within the plan area. States that there is a move towards renewable energy and as such planning for area should: • Safeguard all existing NGET transmission assets • Support future reinforcement and expansion • Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion • Safeguard existing and potential access routes • Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access • Encourage early engagement with NGET

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			Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security. Supplementary information about the NGET, further advice for development close to NGET assets, and a map highlighting the Local Plan Area are also included.
003	Simon Tucker	Canal and River Trust	Huddersfield Narrow Canal, which runs through the plan area, is owned and managed by the Trust and as such the following amendments have been proposed: Infrastructure (page 8) - include reference to towpaths which sit alongside the canals when mentioning footpaths to ensure active travel is not overlooked. Infrastructure (page 10) - recommends that reference to the need to improve off-site walking and cycling routes should be considered for large developments, to ensure that neighbouring and nearby blue and green infrastructure is appropriately protected. Policy 1 (Green Infrastructure) - supports the policy and suggests that the policy heading is amended to reference ‘blue’ infrastructure, so that the role of waterways is made more explicit. Policy 3 (Protected Space) - supports the reference of SBIs in the supporting text. Policy 13 (Safety and Wellbeing) - consideration should also be given to the potential for development to contribute to the maintenance of existing walking and cycling routes, including the Trust's towpath network, so that any

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			potential damage caused by additional use can be mitigated against at the correct stage. This could be cross-referenced to the last bullet point of Policy 25 which seeks to ensure that development does not degrade existing paths.
004	Sylvia Whittingham	Environment Agency	Preparation of the Plan is welcomed and efforts acknowledged. States that opportunities for the Neighbourhood Plan include: • New green spaces and improvements to public space through new development. • Recognising the value of certain environmental features within a plan area and outline how you intend to protect them and improve them. • Helping a community to manage and adapt to the risk of flooding and climate change by incorporating natural features and green space to manage and store water and supporting the use of sustainable drainage systems (SuDS). • Promoting energy and water efficiency measures for new builds. Recommends the Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies and local River Basin Management Plan as appropriate. Also recommends that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is considered if the Plan looks to fund local infrastructure. States that Neighbourhood Plans should conform to national and local policies on flood risk and if any development is proposed in flood risk areas, any Strategic Environmental Assessment should include baseline information about the flood risks and include it as a key sustainability issue and as an objective.

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005	Melanie Lindsley	The Coal Authority	Notes that there are recorded coal mining features present at surface and shallow depth including; mine entries and coal workings which may pose a potential risk to surface stability and public safety. However, no comments or issues are raised.
006	Karen Williams	Individual	States that there should be greater inclusion of the importance of policing and community safety across Saddleworth and that there should be a greater inclusion of this within the plan. Notes examples that can be drawn upon to ensure this is an integral part of making Saddleworth a safe place to live and work.
007		Equality and Human Rights Commission	No comments or issues raised.
008	Sally Wintle	Natural England	No comments or issues raised. Supplementary information regarding the issues and opportunities that should be considered when preparing a Neighbourhood Plan is included.
009	Stuart Beesley	Individual	Suggests the inclusion of policy that has a presumption in favour of residential use for 'undesignated' land use. This would help meet the housing needs/demands of the borough. States that policies should allow for development of undesignated land of in smaller sites and smaller sites in rural areas of the borough as this would create incremental organic housing growth which is likely to be more acceptable to local communities. Also states this could be linked to Housing Associations thereby enabling a mix of tenure type and increase the affordability of rental properties.

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			Also states that a policy that meets the above requirements will encourage a steady growth in housing supply to help meet the Council's s vision of building 11,560 new homes.
010	Stuart Morgans	Sport England	Does not object to the Local Green Space boundary designation at Ashfield Playing Field, Springhead, but has identified an inconsistency between the boundary plans included in Appendix 3 of the plan. Appendix 3 of the plan excludes the stadia grass football pitch from the designation, while the LGS document (dated November 2024) includes it. Requests clarification as to whether this is intentional or a drafting error. Supports excluding the stadia pitch and associated sports facilities (car park and pavilion) from the LGS designation, as this would avoid LGS restrictions on future improvements to ancillary facilities. Also notes that the playing field would continue to be protected by national planning policy, relevant development plan policies and Sport England's Playing Fields Policy. Previous comments submitted on 4 June 2024 remain relevant and requests these to be reiterated.
011	Planning Policy Group	Kirklees Council	No comments or issues raised.
012	James McCutcheon	TfGM	Supports the plan's direction however states that several transport and accessibility policies would benefit from refinement to improve clarity, consistency with Greater Manchester priorities, and deliverability. Parking Standards – recognises local concerns about parking pressures and limited public transport available in certain areas. However, states that Policy 24’s expectation for two parking spaces per dwelling plus 0.5 visitor spaces could benefit from more flexibility. Suggests that parking provision would be

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			better guided by site accessibility, proximity to local services, public transport availability and the quality of walking and wheeling and cycling connections. Where a standard of two spaces per dwelling plus 0.5 visitor spaces is retained, TfGM recommends that the Plan encourages well-designed unallocated parking rather than defaulting to individual driveways. This would support a more place-sensitive and accessibility-led approach, better align with Streets for All principles. Walking, Wheeling and Cycling – strongly supports intent of Policies 25 and 26. Suggests that the wording would benefit from referring consistently to walking, wheeling and cycling, with greater emphasis on routes that are safe, direct, convenient and inclusive for all users, including disabled people. The policies would benefit from stronger connections to village centres, schools, healthcare facilities and public transport nodes, while ensuring development does not limit future route improvements, including opportunities linked to the Bee Network and rights of way enhancements. Also, would welcome the inclusion of stronger support for junction and crossing improvements that reflect Streets for All principles by giving greater priority to people walking, wheeling and cycling. Public Transport – welcomes Policy 27 enhancement of rail use and accessibility. Suggests that The Plan would benefit from continuing to support station accessibility improvements, including step free access where deliverable, alongside better cycle parking, walking and cycling links and onward bus integration. The Plan could also support gentle, context-sensitive residential density increases within walking distance of Greenfield Station, where appropriate to Saddleworth's rural geography and local character. This could strengthen the case for future service enhancements. Increased

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			patronage and viability supported by gentle density around the station could strengthen the case for future rail and bus service improvements. Major Development Sites - supports Policy 11's requirement for larger developments to prepare masterplans that support integrated, accessible and sustainable transport systems. Recommends that a vision-led planning approach is utilised where transport outcomes are considered from the outset and used to shape the location, layout, density and phasing of development, supported by a transport assessment or travel plan where appropriate. Transport and infrastructure planning for these sites would benefit from early collaboration with Oldham Council, TfGM and relevant providers. This would help ensure that site design supports viable bus access, inclusive walking, wheeling and cycling links, and sustainable access to healthcare, education and local services, while addressing transport-related social exclusion in Saddleworth's more isolated communities.
013	Emma Grange	Historic England	No further comments or issues raised.
014	Alan Chorlton	Chorlton Planning	Suggests that reference must be made for the need to allow more overnight stay accommodation. Camping, glamping and limited small chalet units are suggested. States that the planning policy needs to accommodate this type of use. Also, questions if the Parish Council will take the lead on robust enforcement of unauthorised development and the maintenance of the character of the built environment. States that local councillors and officers are ideally placed to be the focal point for reports of unauthorised or unsympathetic development and action needs to be taken to avoid further erosion of the built and natural landscapes.

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015	Cait O'Dowd	AshtonHale on behalf of Saddleworth Property Partnership	Saddleworth Property Partnership support the objective of delivering sustainable growth across Saddleworth but considers that the Neighbourhood Plan should adopt a flexible policy framework to enable appropriate brownfield redevelopment opportunities to come forward where supported by evidence. They set out that Saddleworth Business Centre (SBC) is no longer a suitable or viable employment site due to access, amenity and operational constraints, and that it should instead be allowed to redevelop for housing. They therefore seek a number of modifications to the Plan. These include: Policy 10 (Design, Character and Heritage) – states that residential redevelopment of SBC could enhance the setting of the nearby New Delph Conservation Area and listed building, that replacing employment activity with housing would reduce visual and environmental impacts and that a well-designed housing scheme would better reflect the surrounding residential character. Policy 11 (Design Masterplans) – question the blanket requirement for masterplans on schemes of more than 25 homes. State that a more proportionate, criteria-based approach would be preferable. Policy 15 (Housing) – general support for the policy but seek greater flexibility is included. They request the policy is amended to include having regard to having regard to site-specific circumstances, viability, deliverability and the wider strategic evidence base. In addition, request that text is added that makes clear that the preferences in the policy are applied flexibly and should not prevent sustainable brownfield sites from coming

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			forward where an alternative mix would still contribute meaningfully to identified housing needs. Policy 16 (Consultation) - general support for the policy but state it would be preferable for the policy to encourage appropriate engagement measures to be agreed on a case-by-case basis, rather than imposing a uniform requirement in all instances. Policy 19 (Retail, Commerce and Industrial Development) – request the be modified to make clear that alternative uses will be supported where robust evidence demonstrates that continued employment or commercial use is no longer viable, suitable or deliverable. State that SBC is constrained by poor access, neighbouring housing and operational difficulties and that existing occupation levels do not necessarily demonstrate long-term viability.
016	Andrew Leyssens	United Utilities	United Utilities are supportive of the overall direction of the Saddleworth Neighbourhood Plan and particularly welcomes the recognition of climate change as a cross-cutting theme. Some minor amendments are suggested to strengthen the Plan's approach to climate resilience, sustainable water management, infrastructure delivery and protection of public water supply resources. The amendments are suggested to the following: Vision – support the vision but would like some additional wording added that further reflects the importance of climate adaptation and resilience. Policy 3 (Protected Spaces) – state that Saddleworth contains significant areas of land used for public water supply catchment purposes and that these catchments play an important role in protecting water quality and water resources. Additional wording put forward to reflect this.

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			Policy 4 (Local Green Spaces) – note that some Local Green Spaces contain underground water and wastewater infrastructure and to ensure sufficient flexibility for future infrastructure investment, additional wording is suggested. Policy 6 (Conversion of Agriculture Buildings) – reinforces the comment that parts of Saddleworth include water catchment land used for public water supply purposes. Recommends additional wording reflect this. Policy 8 (Erosion and Flooding) - strongly supports the policy but consider that greater emphasis should be given to multifunctional Sustainable Drainage Systems (SuDS) and flood resilient design. Recommends additional wording reflect this. Policy 9 (Sustainable Construction) – recommend that the policy includes reference to water efficiency. Additional wording suggested to reflect this. Policy 11 (Design Masterplans) - Supports the requirement for masterplanning and integrated site design. Recommends additional wording added in relation to water supply, wastewater infrastructure, surface water drainage and wider green and blue infrastructure. Policy 12 (Chew Brook Vale) - support the requirement for development to be informed by a flood risk assessment. Howeve, have previously raised concerns regarding incorrect reservoir flood risk information in the Greater Manchester Level 2 Strategic Flood Risk Assessment for Chew Brook Vale. Would welcome recognition of the need for ongoing engagement with the reservoir undertaker and additional wording suggested to reflect this. Policy 18 (Community and Self Build) - support the principle of community-led and self-build development, however, to avoid

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			fragmented infrastructure delivery additional wording suggested. Policy 29 (Air Quality and Vibration Monitoring) – recommend that the policy also reflects the 'agent of change' principle in the National Planning Policy Framework. Additional wording suggested to reflect this.
017	Hyacynth Cabiles-Paragas	NHS Property Services on behalf of NHS Greater Manchester ICB	The NHS Greater Manchester Integrated Care Board (NHS GM ICB) is broadly supportive of the Saddleworth Neighbourhood Plan and particularly welcomes policies that recognise healthcare infrastructure, health impact assessments and developer contributions towards health services. Comments submitted in relation to: Policy 11 (Design Masterplans) where support is given for the requirement for masterplans on larger developments, however states that Infrastructure Delivery Plans (IDPs) should explicitly consider healthcare infrastructure and that healthcare needs arising from development should be identified at an early stage. Policy 12 (Chew Brook Vale) - supports the policy approach and particularly welcomes the links to the Places for Everyone (PfE) infrastructure planning framework. Policy 14 (Health Social and Education) – state that NHS GM ICB are fully supportive of policies requiring developments to consider the impacts of major residential development on local healthcare infrastructure systems. Welcome the broad aspirations of the policy and are fully support of the use of S106 contributions for healthcare facilities.

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			Policy 21 (Tourism and Leisure) - in relation to Policy 21, a modification is requested. The NHS GM ICB seeks additional flexibility to allow surplus healthcare facilities and NHS sites to be redeveloped without onerous requirements to retain community uses. The NHS considers this necessary to support estate modernisation and the reinvestment of resources into improved healthcare services.
018	Michael Iveson	Mossley Town Council	No comments or issues on the Plan raised. (Late response)