

# Delegated Decision Report

Decision below £250k



<b>Subject:</b>	Peak District National Park Authority: Local Plan Consultation on Preferred Approach (Regulation 18) – Oldham Council response
<b>Decision maker: Senior Officer</b>	Emma Barton, Deputy Chief Executive (Place)
<b>Decision maker: Cabinet Member</b>	Cllr Elaine Taylor, Statutory Deputy Leader and Cabinet Member for Neighbourhoods
<b>Decision date:</b>	8 December 2025
<b>Report author:</b>	Georgina Brownridge
<b>Ward (s):</b>	Saddleworth North and South

## Reason for decision

The reason for this decision is to approve comments made on the 'Peak District National Park Authority (PDNPA): Local Plan Consultation on Preferred Approach (Regulation 18)' so that comments can be submitted and considered by the PDNPA as part of the formal consultation. The consultation closes on 21 December 2025.

## Recommendation(s)

1. To approve comments made on the 'Peak District National Park Authority (PDNPA): Local Plan Consultation on Preferred Approach (Regulation 18)' so that comments can be submitted and considered by the PDNPA as part of the formal consultation. This will allow Oldham Council's views on cross-boundary matters to be considered. There are no disadvantages to this option.

## Background

The PDNP are inviting formal representations on the [Local Plan Review Preferred Approach and supporting documents](#)<sup>1</sup>.

Part of Oldham falls within the Peak District National Park (PDNP). Within this part of the borough Oldham Council is not responsible for planning functions however we have a duty to cooperate, particularly on matters that have cross boundary implications.

Comments have been drafted and these focus on the following areas. A summary of the comments is provided below:

**Vision:** Support vision, however, question date, which is inconsistent with the rest of the plan.

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<sup>1</sup> The consultation can be viewed at <https://peakdistrict-consult.objective.co.uk/kse/>

**Outcome 8: The Peak District National Park is more resilient and net-zero by 2040 through its exemplary response to climate change:** Comments questioning whether the plan will protect and enhance all peat or peat that is capable of restoration to support notable habitats.

**Draft Policy Direction 1: Biodiversity, nature recovery and geodiversity:** Comment about the ordering of nature designations and requesting that the relevant Local Nature Recovery Strategies are listed and / or shown on a map.

**Draft Policy Direction 4: Development management principles:** Comment requesting that the need to avoid flood risk be specified and more detail around some of the policy criteria, for example water efficiency.

**Policy 7 Protecting and managing the Natural Zone:** Comment requesting the Natural Zone is shown on a map.

### **Habitats Regulations Assessment (HRA) and Functionally Linked Land.**

This is the most significant area of comments by Oldham Council.

The HRA has screened in parts of the Local Plan because it has Likely Significant Effects (LSEs) on the screened in sites – including the South Pennines Special Area of Conservation / Special Protection Area, part of which falls within Oldham borough. Appropriate Assessment should then be undertaken to look at the possible causes (pathways and sources) in more detail and identify mitigation to offset the LSEs to support the plan being able to be made.

At Issues and Options stage, the HRA stated appropriate assessment would be undertaken at the next stage, which is the current consultation. However, the HRA being consulted on has concluded the same - that an appropriate assessment will be undertaken at the next stage.

This is not considered to be appropriate. LSEs are identified and the HRA does not propose any mitigation and therefore the Local Plan at a Preferred Approach stage has not been able to consider and be informed by the HRA process so far. It also means that Oldham Council has not been able to comment on any proposed policies as a result of the HRA.

The comments refer to the approach and mitigation provided by the Places for Everyone HRA and subsequent Policy JP-G5 Uplands and the [South Pennine Moors SAC/SPA Supplementary Planning Document](#).

As the South Pennine Moors falls within Oldham and Oldham Council, alongside Rochdale Council and Tameside Council, is responsible for ensuring we protect the integrity of the South Pennines SAC/ SPA through assessing for Functionally Linked Land within 2.5km of the SAC/SPA as part of the planning application process we would expect the PDNPA to follow a consistent, or other appropriate mitigation response, and to include a policy in the Local Plan that addresses this.

## Sustainability Appraisal and Equalities

It is not clear if and how the recommendations from the SA have been considered and no equalities impact assessment was available.

### Alternative option(s) to be considered *(please give the reason(s) for recommendation(s))*

1. To approve comments made on the 'Peak District National Park Authority (PDNPA): Local Plan Consultation on Preferred Approach (Regulation 18)' so that comments can be submitted and considered by the PDNPA as part of the formal consultation. This will allow Oldham Council's views on cross-boundary matters to be considered. There are no disadvantages to this option.
2. Not to approve comments made on the 'Peak District National Park Authority (PDNPA): Local Plan Consultation on Preferred Approach (Regulation 18)' so that comments can be submitted and considered by the PDNPA as part of the formal consultation. This will mean that the comments drafted are not considered. There are no advantages to this option.

## Consultation

Peak District National Park Authority: Local Plan Consultation on Preferred Approach (Regulation 18) is a public consultation. The consultation closes on 21 December 2025.

## Risks

The main area of comment is concerned with the risk to the integrity of the South Pennines SAC/ SPA.

## Implications

Financial	There are no direct financial implications arising from approving the submission of comments to the Peak District National Park Authority's Local Plan Consultation. The decision simply enables comments to be submitted before the consultation closes on 21 December 2025, with no impact on current budgets or future financial commitments.  (Mohammed Hussain)
Legal	The Local Planning Scheme of Delegation approved by Council in 2022 delegates responsibility for providing comments on planning consultations to the Executive Director in consultation with the Portfolio Member. (A Evans)
Procurement	None (SKapoor – Commercial Procurement Unit)
Equality impact including implications for Children and Young People	None in relation to sending comments.
Other	N/A

Has the relevant Legal Officer confirmed that the recommendations within this report are lawful and comply with the Council's Constitution?	Yes
Has the relevant Finance Officer confirmed that any expenditure referred to within this report is consistent with the Council's budget?	Yes
Are any of the recommendations within this report contrary to the Policy Framework of the Council?	No

#### Appendix

1. Peak District National Park Authority: Local Plan Consultation on Preferred Approach (Regulation 18) – Oldham Council response

Report author sign-off	G. Brownridge
Role	Senior Planning Officer
Date of sign-off	04/12/2025

<b>Approval</b>	
Officer approval sign-off	 Emma Barton
Role	Deputy Chief Executive (Place)
Date of sign-off	12/12/25

<b>Approval</b>
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Member(s) approval sign-off	
Role	Statutory Deputy Leader and Cabinet Member for Neighbourhoods
Date of sign-off	12 <sup>th</sup> December 2025