APPLICATION REPORT – OUT/352888/24
Planning Committee 11th November 2026

Registration Date	3rd February 2025
Ward	Saddleworth South
Application Reference	OUT/352888/24
Type of Application	Outline
Proposal	Full planning application for demolition of poor-quality buildings, conversion of older buildings to 59 no. apartments, construction of 27 no. dwellings, with associated access road, parking, and landscaping
Location	Waterside Mill, Chew Valley Road, Greenfield OL3 7NH
Case Officer	Graham Dickman
Applicant	Tanner Bros (Greenfield) Ltd
Agent	Alan Chorlton

1. INTRODUCTION

1.1 This application is presented to Planning Committee as it relates to a Major application above the applicable threshold in the Council's Constitution.

1.2 The application was deferred from the agenda for the last Planning Committee meeting in order to allow an opportunity for Saddleworth Parish Council to submit any comments on the application.

2. RECOMMENDATION

2.1 It is recommended that the application is approved subject to the conditions set out in this report.

3. SITE DESCRIPTION

3.1 The application site is the Waterside Mill complex located to the east of Greenfield.

3.2 Vehicular access is obtained via a private cul-de-sac access road which crosses a bridge over Chew Brook before emerging onto Holmfirth Road. Public Footpath 230 SADD runs along this access road before continuing to the south. A further Public Footpath, 266 SADD runs eastwards along the site's northern boundary.

3.3 The site itself comprises a complex of buildings gradually developed by Tanner Brothers as a cotton mill from the early 19th century. The earliest core building is an elongated (east-west) three-storey, stone-faced building, towards the front of which a three-storey block heads south and leads to a two-storey office block.

3.4 A further elongated north-south, two-storey block adjoins the eastern end of the core

building.

3.5 These buildings surround a later single-storey weaving shed. Further buildings added in the 20th century are located to the north of the core building.

3.6 In addition to the industrial buildings, the site includes three groups of residential cottages alongside Waterside along with a more modern pair of houses to the south.

3.7 A large mill lodge is located partly within the site boundary before continuing eastwards.

3.8 Beyond the site boundary a number of detached residential properties are located to the west and north-east of the site.

4. THE PROPOSAL

4.1 The proposal involves the demolition of the mill buildings which largely form part of the later development on the site and conversion of the retained buildings to create 59 apartments. A new fourth-floor will be added to the existing three-storey structure.

4.2 In addition, 27 new dwellings would be erected. This will comprise a row of 17 three-storey houses to be located on the north side of the site replacing the demolished 20th century mill buildings. Communal car parking will be provided for these dwellings.

4.3 A total of 10 dwellings, in a mix of two and three-storey, will be located to the south and east of the site. These properties would have two in-curtilage parking spaces each.

4.4 The applicant has indicated that it has always been the intention, and remains so, that the proposals are targeted at older people who wish to move to smaller dwellings in a quiet and attractive location. The applicant considers that there is a substantial demand for such accommodation in Saddleworth and that the application site is ideally placed being both secluded but sustainably close to Greenfield village.

4.5 However, given considerations of the financial viability of the overall scheme, the applicant has concerns that a situation could subsequently arise where the demand for the dwellings from older people has been satisfied and the remainder of the units cannot be sold as they will not comply with any over 55 age occupancy restrictions.

4.6 Due to the high capital costs of the project any such occupancy restriction could bring the financial viability of the whole scheme into question. Therefore, to avoid a scenario where empty units remain unsold, and there is a clear demand in Saddleworth and Oldham for more general needs housing to be made available, the proposal seeks approval without any such occupancy restriction.

4.7 A new access road will be provided around the northern and eastern site along with ancillary landscaping.

4.8 As originally submitted the application comprised a ‘hybrid’ proposal including an ‘outline’ application for a new employment building in the northern portion of the site. This aspect has now been removed from the present application which now solely comprises a ‘full’ application for residential development.

5. PLANNING HISTORY

DEM/354504/25 – Demolition of single storey weaving shed with a traditional north-light roof (early 1900s) and a part single, part two storey storage shed with brick walls and an asbestos roof (1930s). Prior approval required and granted 23 December 2025.

6. RELEVANT PLANNING POLICIES

6.1 The statutory development plan for Oldham currently comprises:

- The Places for Everyone Joint Development Plan Document (PfE) (2024);
- The Joint Core Strategy and Development Management Policies Development Plan Document (referred to as the Local Plan) (2011); and,
- The Proposals Map (2011), including designations from the former Unitary Development Plan where policies are saved.

6.2 The following policies are considered relevant to the determination of this application:

Places for Everyone

Policy JP-S1: Sustainable Development;
Policy JP-S2: Carbon and Energy;
Policy JP-S4: Flood Risk and the Water Environment;
Policy JP-S5: Clean Air;

Policy JP-J2: Employment Sites and Premises;

Policy JP-H1: Scale, Distribution and Phasing of New Housing Development;
Policy JP-H2 - Affordability of New Housing;
Policy JP-H3 - Type, Size and Design of New Housing;
Policy JP-H4 - Density of New Housing;

Policy JP-G1: Landscape Character;
Policy JP-G2 Green Infrastructure Network;
Policy JP-G3: River Valleys and Waterways;
Policy JP-G5: Uplands;
Policy JP-G7: Trees and Woodland;
Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity;
Policy JP-G9: The Green Belt;

Policy JP-P1 Sustainable Places;
Policy JP-P2: Heritage;

Policy JP-C1: An Integrated Network;
Policy JP-C2: Digital Connectivity;
Policy JP-C3: Public Transport;
Policy JP-C5: Streets for All;
Policy JP-C6: Walking and Cycling; and,
Policy JP-C8: Transport Requirements of New Development.

Joint Core Strategy and Development Management Policies (the Local Plan)

Policy 9: Local Environment;
Policy 13: Employment Areas;
Policy 21: Protecting Natural Environmental Assets;

Policy 22: Protecting Open Land; and,
Policy 23: Open Spaces and Sports.

National Planning Policy Framework (August 2026) and National Planning Practice Guidance (NPPG)

6.3 The National Planning Policy Framework (NPPF) was revised in August 2026 and sets out the Government's planning policies for England. It is a material consideration of significant weight in the determination of planning applications and is structured around nationally numbered decision-making policies. Relevant national policies are identified and assessed throughout the report.

6.4 Annex A of the NPPF provides that development plan policies which are materially inconsistent with the national decision-making policies should be given very limited weight, except where those policies have been examined and adopted, or made, against the revised Framework. Annex A also makes clear that development plan policies should not be afforded reduced weight solely because they were adopted before publication of the revised Framework. Where a policy relevant to this application is affected by Annex A, the weight attributed to that policy, and the reasons for that conclusion, are set out within the assessment.

6.5 The National Planning Practice Guidance (NPPG) is updated periodically and is a material consideration where relevant. Other guidance includes Planning Practice Guidance, National Design Guide and National standards for sustainable drainage systems (SuDS).

Other Guidance and Supplementary Planning Documents (SPDs)

6.6 Several SPDs provide guidance on the interpretation and implementation of Local Plan policies. While some are dated, they remain material considerations:

- Residential Design Guide SPD (2007) – Sets out principles for high-quality residential design, including layout, scale and amenity standards.
- Public Realm Design Guide SPD (2007) – Provides guidance on the design and construction of streets and public spaces, forming part of the Urban Design Guide SPD.
- South Pennine Moors SAC/SPA SPD – Supplements PfE Policy JP-G5, ensuring development does not adversely affect protected habitats within 400m of SAC/SPA boundaries or functionally linked habitats within 2.5km.
- Holcroft Moss Planning Obligations SPD – Supplements PfE Policy JP-C8, requiring assessment of air quality impacts on Holcroft Moss SAC for developments requiring a Transport Assessment.
- Greater Manchester Local Nature Recovery Strategy (LNRS) - Adopted in September 2025 under the Environment Act, the LNRS sets priorities for nature recovery and informs biodiversity enhancement measures.

Interim Planning Position Papers

6.7 These papers provide additional guidance and are material considerations, though they carry less weight than SPDs:

- Affordable Housing – Clarifies implementation of the Council's affordable housing position under policy 10, including thresholds, tenure mix and delivery mechanisms.

- Education Contributions – Sets out an alternate methodology for calculating developer contributions for school places.

- Open Space – Provides guidance on assessing open space contributions, including usability standards and maintenance costs, supplementing Policy 23.

- Supporting Oldham's Economy – Clarifies measures to mitigate the loss of employment sites under Policy 14.

Other Emerging Policy

6.8 The Oldham Local Plan: Publication Plan has been published and consulted on. This stage represents the final draft of the Local Plan prior to submission for independent examination, prepared under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

6.9 The Saddleworth Local Plan has been through examination, and the Examiner has recommended some modifications, which the Council have agreed to. The Plan will now proceed to referendum but can still be given weight in decision-making.

6.10 The Publication Plan sets out the Council's updated vision, objectives and non-strategic planning policies on matters including housing, design, climate change, transport, open land, and community facilities. It will gain weight as it progresses towards submission and adoption and if weight is to be attributed to this it will be identified within the following sections of the report."

7. CONSULTATIONS

Highways Officer	The submitted Transport Statement satisfactorily demonstrates that the additional traffic generation associated with the development would not have an adverse material impact on the highway network, subject to planning conditions, including a scheme of improvements to the existing access junction to Holmfirth Road.
Environmental Health	Recommend conditions in respect of construction management and air quality, and a full contaminated land investigation.
Environment Agency	No objections subject to imposition of various conditions in relation to the Flood Risk Assessment, a development buffer zone alongside Chew Brook, minimum floor levels, landscape and ecological management, and treatment of invasive species.
United Utilities	Recommend a condition for the submission of a sustainable drainage system.

G M Ecology Unit	Recommend conditions in relation to protection of wildlife and habitat management and maintenance.
Drainage	No comments received.
Trees Officer	Replacement tree planting on a 2 for 1 basis will be required.
GM Archaeological Advisory Service	Recommend a condition for appropriate recording of any archaeological information.
Growth Lancashire	No objection since the proposals would result in low level harm to the mill, which is a Non-Designated Heritage Asset.
Natural England	No objection. Based on the plans submitted, the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.
Growth Lancashire	Any harm will be outweighed by the benefit of securing re-use, subject to additional detailing.
Coal Authority	No comments as the site is not within a defined coalfield.
Education	As the proposals are intended for the over 55 age group no financial contribution is requested
Wildlife Trust	No objections

8. PUBLICITY AND THIRD-PARY REPRESENTATIONS

8.1 In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015, and the Council's adopted Statement of Community Involvement, the application has been advertised as a major development and departure from the Development Plan by neighbour notification letters, display of a site notice, and publication of a press notice.

8.2 In response 3 representations have been received on the following grounds.

- The Floor Risk Assessment does not adequately address the flood risk to neighbouring properties situated on lower ground.

- The access road and bridge across Chew brook are not wide enough for the likely traffic and future responsibility for maintenance of the bridge needs to be clarified.

- Insufficient details of landscaping.

- Overlooking of neighbouring properties on lower land.

- The size of properties shown are not appropriate for 'down-sizing' over-55 year olds as proposed.

8.3 Saddleworth Parish Council recommendation refusal of the application.

8.4 The Parish Council supports the application in principle; however, clarification is required on a number of concerns before the Parish Council can recommend approval.

- A total of 57 reports are listed on the portal, some are out of date, making it very confusing. It is requested these are stripped out and the portal updated.

- Bridge Structure – The Parish Council was advised that a more comprehensive survey has been carried out, and this was shared at the Parish Council Planning Committee meeting; but was not available on the portal. Clarification is required that the bridge is structurally sound and able to accommodate the weight of fully laden construction vehicles. There is a contradiction in this recent survey which states 18 tonnes, and the verbal information received from the applicant that it can take up to 40 tonnes. Any additional information from the highways Officer is requested.

- More clarification is required regarding the intention that this development is marketed for over 55s. The Parish Council understands the apartments will be attractive to the over 55s but few would wish to take on a 3-storey house with up to 4 bedrooms.

- The Parish Council is not convinced of the evidence for the development not being economically viable to enable a Section 106 contribution.

- There is no evidence in the application to show that it will provide support for the existing infrastructure, i.e. health provision and public transport. For example, the transport document which states the description of the buses and timings is inaccurate. In addition, the GP service referenced is only a satellite provision, 1 day per week when this is possible to be facilitated.

- The Committee was disappointed that the provision for employment units had been removed from the application. The developer advised that this was due to flood risk in that area of the site. This should be addressed within the current application to make the development more in line with the Saddleworth Neighbourhood Plan.

- The application provides no information on amenities and is in contradiction to the Saddleworth Neighbourhood Plan.

ASSESSMENT OF THE PROPOSAL

9. PRINCIPLE OF DEVELOPMENT

9.1 The application site lies within an allocated Saddleworth Business Employment Area on the Proposals Map which accompanies the adopted Local Plan. This employment land designation is reflected within the emerging Draft Local Plan.

9.2 Local Plan Policy 14 states that "*where uses of sites currently or most recently used for employment purposes which are not listed in the Policy are proposed these will be permitted where the developer has demonstrated:*

a. Through a marketing exercise, agreed with the Council before commencing and to be of a professional standard, that there is no market for the uses listed in the

Policy, or,

b. Through a viability exercise that the continued use/development of the site for the listed uses is unviable, or,

c. That the development of the site for alternative uses would benefit the regeneration areas identified by the Council as being in need of investment or would benefit the community of the area".

9.3 Furthermore, development proposals which result in the loss of an employment site should include measures to outweigh the loss of the site and support Oldham's economy.

9.4 In this instance, the application has been accompanied by a Viability Appraisal.

9.5 This is reflected in emerging Local Plan Policy E3 which states:

"In the "established employment areas" shown on the proposals map, the Council will permit development for employment purposes (as defined in the explanation and justification) both on vacant sites and through the redevelopment of sites already in use.

Proposals for residential or mixed use development in "established employment areas" or at individual or small groups of existing employment premises not shown on the proposals map, will not be permitted unless, after assessment of the following factors, it is considered that the Borough's housing requirements and the regeneration benefits of the development outweigh the potential of the site in its present form for further employment use:

a) the quantity and type of employment sites and premises available in the area, and

b) evidence of demand for employment sites and premises in the area, and

c) the suitability of the site for further employment use in terms of size, physical characteristics, access, traffic impact, and sensitivity of surrounding land uses, and

d) the opportunity which may be presented for new forms of employment as part of a mixed use scheme."

9.6 PfE Policy JP-J2 notes that "*Existing employment areas that are important to maintaining a strong and diverse supply of sites and premises in our boroughs will be protected from redevelopment to other uses, nurtured to ensure they remain competitive and their accessibility improved where necessary".*

9.7 The application is not accompanied by any details of a marketing exercise having been carried out, nor has it been demonstrated that the redevelopment of the site would benefit any identified regeneration areas.

9.8 The application is, however, accompanied by a 'Viability and Employment Land Release Assessment. This document has been independently reviewed on behalf of the Council.

<u>The release of employment land</u>

9.9 The applicant has provided information and a commentary regarding the north-west

industrial property market and the local Greenfield property market, including details of competing sites in the surrounding area, noting the preference of occupiers for Grade A or B purpose-built units with appropriate eaves heights, service yards, and good energy efficiency ratings, which are within well-connected locations.

9.10 In this regard, due to the configuration and age of the existing buildings, the site performs poorly, whilst Greenfield is not a location with prime access having regard to the local highway network. In addition, rental levels tend to be significantly lower than in prime locations.

9.11 The applicant has submitted supporting evidence regarding currently available and recently sold/let properties. This has been reviewed by the independent assessor who considers this to be a reasonable reflection of the local and regional employment property market.

9.12 Having regard to economic and commercial property market outlooks, and to a review of recent employment related transactions in the area, the Council's independent assessor concludes that those values are consistent with those submitted by the applicant's consultant.

9.13 The submitted report goes on to consider issues associated with the costs of refurbishment to retain the existing employment uses. In this regard, although no formal marketing of the site has been undertaken based on the current uses, the independent assessor is of the view that given the condition of the buildings, any new lettings would only attract low rents. Relative to the maintenance and management costs of the property, this would not be sustainable in the long term.

9.14 An assessment has also been carried out, and additional information requested from the applicant in relation to a present tenancy schedule and current operational/management costs of the existing buildings. The review concludes that based on recent occupation levels, the current financial position is unsustainable in the long term even if savings were to be made on some of the operating costs (e.g. demolition of buildings).

9.15 The independent assessor is therefore satisfied that the applicant has demonstrated the continued use of the site based on the current occupation and operation is unviable.

New build employment development

9.16 An appraisal has been undertaken by the applicant's consultant of a new build development, assuming redevelopment of the part of the site currently used as part single/part two-storey warehousing for the construction of new build industrial units reflecting the current authorised uses of the site.

9.17 The independent assessment indicates that there would be an improved Return on Cost for the developer, however, this is still (at -57.42%) below the Target Developer Return of 20% on Costs, reinforcing the challenging viability of an employment led redevelopment of the site.

9.18 It is therefore agreed that a new build employment development on the site is commercially unviable.

Residential financial viability assessment

9.19 The applicant's viability assessment assumes a Gross Development Value (GDV) of

£29,152,000 for the development as proposed whereby all accommodation would be for over 55s occupation (albeit that this tenure is not a specific requirement of planning policy), whilst noting that there are only limited comparable schemes to which reference can be made.

9.20 Having considered the available market evidence, and the location of the proposed units, the independent assessor considers that the revenues adopted by the applicant for the houses are reasonable, however, the apartment values are understated.

9.21 As such, for the purposes of this appraisal, increased values for the apartment units have been adopted, which it is considered are in keeping with the market evidence and which increase the GDV of the scheme from £29,152,000 to £32,123,200.

9.22 A subsequent assessment of the build and associated costs has been undertaken, along with the likely developer's financial return. Whilst, in general, the analysis put forward by the applicant's consultant is agreed, for the purposes of this assessment a reduced Developer's Return of 18% on GDV for the market sale units has been adopted, which it is acknowledged is slightly below what would usually be expected given the size and risk profile of the scheme.

9.23 The independent assessor has carried out a detailed review of the submitted appraisal and supporting evidence. As noted above, whilst generally, the appraisal inputs adopted by applicant are reasonable, there is a difference of opinion with the applicant regarding the following items (in addition to some minor differences on other inputs):

- The suggested Gross Development Value for the subject site of £29,152,000 has been increased to £32,123,200.
- Submitted construction costs of £26,183,700 have been reviewed and lower construction costs of £24,867,756 have been assumed.
- Developer's Return on Open Market Sales has been reduced from 18.5% on GDV to 18% on GDV, acknowledging that the margin is slightly below what would usually be expected given the size and risk profile of the scheme.

9.24 A revised appraisal has therefore been produced.

9.25 The analysis illustrates that the scheme, even without any S106 contributions or affordable housing contribution, produces a residual land value of -£3,406,000 for the landowner which is significantly below the £Nil benchmark land value. This demonstrates that financial viability is a material consideration and that the scheme is unable to provide any level of affordable housing or other planning contributions.

Housing type and range

9.26 PfE Policy JP-H3 requires the provision of housing for a range of dwelling types and sizes, and also the provision of housing for older people.

9.27 The Saddleworth Local Plan indicates that Saddleworth has an identified lack of appropriate housing for young families, with local first-time entrants into the housing market unable to find properties to rent or buy. Similarly, there is a lack of affordable housing for people to downsize to when they are older.

9.28 Oldham's Local Housing Needs Assessment (LHNA) identifies a clear need for specialist older persons accommodation now and in the future, including that for people aged 55 and over (an annual need for an additional 165 units per year of C3 use class

specialist older persons accommodation between 2022-2041). The proposed development would contribute to this need.

9.29 PfE Policy JP-H2 sets out a need to increase affordable housing across the plan area. The capacity of the proposed site qualifies for the Affordable Housing threshold, which applies to developments of 10 dwellings or above, as set out within NPPF.

9.30 In the Planning Statement the applicant referenced an exemption to the 10% requirement for affordable housing within the NPPF, which included where the proposed development provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students). These exemptions are however no longer included in the latest NPPF.

9.31 However, for the reasons set out above, the inclusion of such a requirement would further undermine the potential viability of the development.

9.32 Whilst the applicant has indicated an intention to focus the development on the over 55s age group, and it is evident that such accommodation will serve the needs of the increasing older-age population in Saddleworth, demand for accommodation across the age and family spectrum also exist.

9.33 For this reason, it is not recommended that approval of the application is restricted to a particular age profile, to ensure the needs of the wider community can be accommodated, and not to restrict development in a way which further affects its financial viability

Open Space

9.34 With regard to the impact of proposed housing on open space provision, as the site is a major development, Local Plan Policy 23 states that major residential development should contribute towards the provision of new or enhanced open space, unless it can be demonstrated by the developer that it is not financially viable for the development proposal or that this is neither practicable nor desirable.

9.35 The site is identified in the Open Space Study as being accessible to all types of open space, except provision for children and young people. There are deficiencies in the overall quantity of amenity greenspace, outdoor sports provision, and provision for children and young people within the ward; and there are also deficiencies in the quality of several open spaces within the ward (see Open Space Study – Appendix C).

9.36 Where an area within which a site is located is deficient in at least one of the standards of open space provision (accessibility, quality and quantity), overall, the area is classed as being deficient and as such a developer contribution is required.

9.37 There are landscaped areas and ‘wildlife areas’ with access identified on the proposed site layout plan. Appropriate landscaping and greening is welcomed and encouraged as part of development, however it should be noted that no specific details have been provided detailing the provision of public open space onsite.

9.38 Public open space should serve a clear function. In line with NPPF (Annex B – Glossary), open spaces are defined as ‘all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.’

9.39 Appropriate street furniture (e.g. seating) and planting can contribute to high-quality open spaces and offer recreational value.

9.40 Where on-site open space is not to be provided, a contribution to off-site open space provision based on the deficiencies in the area and the number of bedspaces proposed in the development will be required.

9.41 As noted above, due to viability considerations, it is not possible for any financial contribution to be required in this case.

Green Belt

9.42 As originally submitted, a small element of new development was proposed to be constructed on adjoining land which is situated within the Green Belt. However, this element of the proposal has subsequently been removed from the application and consequently the whole of the proposed development now lies outside the Green Belt.

10. HERITAGE

10.1 There are no buildings listed as being of Historic or Archaeological Importance within or adjacent to the site, nor is the site within or adjacent to a Conservation Area.

10.2 Notwithstanding this, buildings within the site would be considered as non-designated heritage assets given their historic significant to the development of the area. Waterside Mill is included in the proposed Local List of buildings with heritage value that the Council will shortly be consulting on.

10.3 NPPF paragraph HE5:1 requires that "*Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance".*

10.4 Paragraph HE7:2 indicates that "*Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset".*

10.5 The application is accompanied by a Heritage Statement.

10.6 The submission has been considered by Growth Lancashire on the Council's behalf. It is considered that the proposed scheme will meet the statutory test 'to preserve', causing no discernible harm to the significance of the heritage assets, of any identified statutory heritage assets.

10.7 In respect of any impact to Waterside Mill as a Non-designated Heritage Asset, some low-level harm will be caused by the scheme, particularly in its partial demolition. However, the harm would be likely to be outweighed by bringing use through conversion to the historic elements of the mill building which are to be retained, ensuring its long-term future.

10.8 The Oldham Mills Strategy seeks to assess the potential for mills in the Borough to continue in a viable use, such that the heritage value can be preserved. Waterside Mill has been identified as a Medium Priority Mill, and so the alteration or extension of any

buildings requires clear justification in relation to significance and setting of the heritage asset.

10.9 In light of the assessment of the practicalities and viability of retaining the mill for employment purposes, it is considered that adequate justification for an alternative approach has been forthcoming, and buildings of historic merit are being retained wherever possible in the development.

10.10 GM Archaeological Advisory Service (GMAAS) has also considered the submitted Written Scheme of Investigation and interim report. GMAAS has recommended the partial discharge of the archaeological requirements at this stage to enable demolition works to progress.

10.11 Full discharge of the condition can be recommended in due course once the data generated from the historic building investigation has been subject to the programme of analysis set out in the agreed Project Design, a final report submitted to the Greater Manchester Historic Environment Record and an appropriate level of dissemination secured.

11. HIGHWAYS ISSUES

11.1 The application is accompanied by a Transport Statement, and subsequent discussions have taken place with the Council's Highways Officer to ensure that satisfactory access arrangements can be achieved to the development site.

11.2 NPPF paragraph TR6:4 116 states that "*Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion".*

11.3 Sole vehicular access to the site is via a private road, Waterside, which serves the existing mill complex. The access crosses a bridge over Chew Brook where it adjoins a further private road serving Greenfield Mill.

11.4 Beyond this junction the highway is adopted, emerging onto the A635 Holmfirth Road, close to its junction with Manchester Road and Chew Valley Road. This is a strategic route through the Borough leading to Yorkshire.

11.5 There is currently an acceptable road safety record along this stretch of highway, with one accident occurring at the junction during the most recent five-year period.

11.6 A robust Transport Statement has been submitted with this application. It outlines the existing conditions on the highway network and the effect that the amount of traffic that is expected to be generated is likely to have.

11.7 It also looks at the more sustainable modes of travel to and from the site in relation to local amenities and any scope for improvement through mitigation measures.

11.8 In order to estimate the trip generating potential of the proposed residential uses, average trip rates from the industry-standard TRICS Database have been obtained.

11.9 The proposed development is likely to generate 32 two-way trips in the AM peak hour and 34 two-way trips in the PM peak hour. The effect of this additional traffic on the local highway network will be barely perceptible during the peak hours and less so outside of the peak hours.

11.10 The results from the TRICS database show that the proposed development will not have a material impact on the operation of the local or strategic highway networks and the traffic impact of the scheme is therefore acceptable.

11.11 The existing site entrance at its junction with Holmfirth Road is difficult to access given the topography. A drawing has been produced which shows that a highway improvement is possible which will allow easier access for vehicular traffic and pedestrians.

11.12 It will be designed so that a left turn into the site and a right turn out of the site will be prohibited. This is due to the topography, as it has been proven that neither manoeuvre can be carried out safely. Instead, drivers will be required to use the nearby roundabout at the Chew Vally Road/Holmfirth Road/ Manchester Road junction in the same way that drivers travelling to Bank Lane from Holmfirth are required to do now.

11.13 It is recommended that a condition is attached which will ensure that a highway improvement is carried out at the junction, but will also include associated footway provision along Holmfirth Road, changes at the roundabout and all signs and road markings.

11.14 Once within the site, access will be gained via the existing bridge across Chew Brook which continues to serve the existing employment uses within the mill buildings and neighbouring residential properties within the site.

11.15 This bridge is not part of the public highway and responsibility for its upkeep rests with the mill owner. A survey of the condition of the bridge was last undertaken in June 2023. This report established a maximum safe vehicle weight in accordance with Highways England standards at the time, with which the owner is aware of the need to ensure compliance. In respect of the present application, this will apply during the demolition period and for any future redevelopment scheme which may be approved, unless accompanying improvements to the bridge are undertaken beforehand.

11.16 The Local Highway Authority does not consider that the existing bridge is of an adoptable standard and subsequently any highway layout within the site will not be adopted by the Council. The applicant is aware that the internal access roads will not be adopted.

11.17 Nevertheless, the existing bridge is considered to be of a satisfactory standard to accommodate the additional traffic associated with the proposed development.

11.18 The bridge also carries a public right of way (Public Footpath 230 SADD). There will be some intensification of use by residential traffic and pedestrians as a direct result of the proposed development. A new footbridge is therefore proposed to be provided

alongside the existing bridge, so that vehicular and pedestrian movements are separated. The public right of way will require diversion under Section 257 of the Town and Country Planning Act 1990 from the existing bridge onto the new footbridge, and the Local Highway Authority will authorise the type and specification of the footbridge to ensure that it is fit for purpose.

11.19 Although not being considered for adoption by the Local Highway Authority, the Highways Officer is satisfied that there is adequate car parking provision and that future residents will be able to move throughout the site safely.

11.20 Subject to planning conditions to secure the implementation of the required improvement works to the site access and the provision of appropriate parking and servicing facilities within the site, it is considered that the requirement of NPPF paragraph TR6:4 116 is satisfied and that there are no highway safety grounds to justify approval of the application.

12. DESIGN AND LAYOUT

12.1 Primary vehicular access to the site will be obtained from the site entrance and extending around the northern and eastern boundary of the site, following the line of the existing roadway serving these areas.

12.2 The proposed development comprises a mix of building types which are designed to be sympathetic to the retained traditional mill buildings, whilst adding contemporary features.

12.3 The proposals seek to convert the historic 1836 core of the building into residential apartments. The existing windows, which consist of a mix of timber and plastic, are to be replaced with a consistent fenestration which reflects the historic arrangement and where required, the stonework across each elevation will be sensitively cleaned.

12.4 Above the retained mill building, a recessed flat roofed extension is proposed at fourth floor to provide additional accommodation. A number of modern additions and extensions will also be introduced across the original mill buildings.

12.5 Subject to a condition relating to the detailed design and materials to be used on the conversion and for the additional floor extension, it is not considered that this would significantly harm the integrity of the building whilst adding to the viability of a scheme for its retention and re-use.

12.6 At the northern side of the retained mill buildings, the more modern structures will be replaced with an elongated block of houses extending over 3 storeys. It will incorporate a saw-tooth roof design reflecting the established design of the later mill buildings which are to be demolished. This block will be separated from the retained mill building by landscaped car parking areas.

12.7 Finally, 3 small blocks, each containing 3 or 4 dwellings, will be constructed to the south and east of the retained mill buildings. These structures will extend to between two and three storeys with a contemporary design with large windows. The use of flat roofs in the design reflects the fact that such arrangements are a dominant feature of the more historic (to be retained) buildings on the site, including the main mill conversion structure and the former office building.

12.8 Final details of facing materials, which include brick and/or stone, reflecting the range of materials within the mill site, will be required for approval prior to the commencement of development.

12.9 Overall, it is considered that the proposals would be sympathetic to the setting of the site and be adequately integrated into its surroundings and to the landscape character of the area as required by PfE Policy JP-G1, having regard to the site's location within the Open Moorlands and Enclosed Upland Fringes (Dark Peak) landscape character type.

13. AMENITY ISSUES

13.1 Although largely in existing industrial use, three blocks of terraced dwellings which will have been traditionally occupied in connection with the mill, and are in the ownership of the applicant, are located on the western side of the mill. These properties will be retained.

13.2 To the north-east of the mill, and sharing the same site access, are three dwellings in separate ownership.

13.3 In all cases the relationship to the proposed dwellings secures acceptable degrees of privacy. Whilst there will inevitably be some disturbance during subsequent construction/conversion works, any approval will be subject to a requirement that a detailed Construction Environmental Management Plan is submitted and approved to regulate those activities.

13.4 As required by Places for Everyone Policy JP-H3, the properties shall comply with the nationally described space standards and be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations, unless specific site conditions make it impracticable.

13.5 A condition will be recommended to ensure the policy's requirements are met.

13.6 Although located on the eastern fringe of the Greenfield settlement, the location is accessible form a variety of local services, including a local convenience store located 500m from the site entrance, a supermarket 1.3km away, a variety of other shops, pubs and social clubs, sports facilities, churches, a pharmacy, primary school, and a satellite doctor's surgery are nearby.

13.7 A half-hourly daytime, and hourly evenings and Sunday, bus service operates from outside the Clarence Hotel close to the site access, whilst further bus services and regular train services are available within Greenfield.

13.8 Whilst, in common with other Greenfield residents, further travel is required to access a wider range of health facilities and secondary schools, it is considered that the site offers satisfactory access to services in accordance with the guidance in NPPF Policy TR3.

14. BIODIVERSITY AND ECOLOGY

14.1 Biodiversity Net Gain is required under the statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).

14.2 This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. As a clear preference, this increase should be achieved through on-site biodiversity gains.

14.3 Based on the application site and indicative proposals, the development would be subject to the statutory BNG requirement.

14.4 A Biodiversity Net Gain Metric and Assessment has been submitted along with a Preliminary Ecological Appraisal.

14.5 As part of the development, it is proposed to undertake habitat enhancement within two adjacent areas which fall within the applicant's wider land ownership. Confirmation that these areas will be registered as Habitat Banks will be required in order to satisfy the requirements of the statutory post-planning approval Biodiversity Gain Plan.

14.6 In order to implement the scheme, including to allow for demolition of the sections of the existing building which are to be removed, replacement tree planting will be required to comply with the requirements of PfE Policy JP-G7, which requires replacement tree planting on a 2 for 1 basis.

14.7 A planning condition will be necessary to ensure the implementation of the required tree planting and biodiversity enhancements, and implementation of a Habitat Management and Maintenance Plan within the applicant's wider land ownership.

14.8 In addition, it will be necessary for the applicant to obtain a licence from Natural England prior to demolition of some of the proposed mill structures which are to be removed. In respect of other potential impacts on mammals, amphibians, and reptiles, a condition will be required to ensure precautionary working measures are implemented in accordance with a submitted method statement.

14.9 The Environment Agency has drawn particular attention to the need to respect the ecological value alongside the Chew Brook watercourse and has recommended various conditions to ensure such features are protected and enhanced.

15. DRAINAGE AND GROUND CONDITIONS

15.1 Part of the overall site is located within Flood Zones 2 & 3 of the Environment Agency's Flood Risk Matrix.

15.2 A Flood Risk and Drainage Assessment has been submitted with the application.

15.3 The Environment Agency had sought clarification that the proposals would not involve development lying within Flood Zones 2 and 3, which occupy the northern section of the site (on which the commercial development was originally proposed).

15.4 Following the submission of further details, the objection has been withdrawn subject to a condition to ensure compliance with the submitted Flood Risk Assessment and a minimum finished floor level for the proposed dwellings.

15.5 Concerns have been expressed by neighbouring residents in respect of potential increased flood risk. As the development will not intrude into areas at risk of flooding, and considering the relationship between the new development, the existing properties, and Chew Brook, there is no evidence to suggest that any existing flood risks will be increased.

15.6 United Utilities considers that a condition will be required to demonstrate that the applicant has explored all options to secure the sustainable drainage of the site and a detailed sustainable drainage plan has subsequently been submitted and approved. This will be a condition of any approval.

15.7 In respect of ground contamination issues, a Phase 1 Desk Study Report has been submitted.

15.8 The Environmental Health Officer has reviewed the report and advised that a full contaminated land assessment will be required as a condition of any approval.

16. ENERGY

16.1 Prior to the commencement of any construction or conversion works, an Energy/ Sustainability Statement will need to be submitted to demonstrate that the buildings can achieve energy efficiency consistent with the 2022 Part L of the Building Regulations and with the measures in TABLE 5.1 of Places for Everyone Policy JP-S2, unless it can be demonstrated that it is not practicable or financially viable.

17. CONCLUSION

17.1 This application proposes the comprehensive redevelopment of a long-established industrial site through a mix of demolition, replacement, and selective conversion of the parts of the mill complex which retain heritage value.

17.2 Consideration has been given to the loss of employment land which, in accordance with Local plan policy should not be permitted unless the applicant has demonstrated either that retention is unviable, or that appropriate compensation for the lost can be achieved.

17.3 In this instance it has been adequately demonstrated that such a justification can be evidenced and that proposals will alternatively allow the creation of a new residential development which is sensitive both to the locality and the historic value of the site.

17.4 Access to the site is constrained by the single point linking to the wider highway network. It is acknowledged that this route utilises a narrow bridge; however, this bridge has historically served, and continues to the serve, the established industrial activity on the site, and it is not considered that vehicle movements generated by the residential use of the site would place a greater stress on the bridge compared to the established industrial use.

RECOMMENDED CONDITIONS:

1. The development must be begun not later than the expiry of THREE years beginning

with the date of this permission. REASON - To comply with the provisions of Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be fully implemented in accordance with the Approved Details Schedule list on this decision notice. REASON - For the avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans and specifications.

3. No development hereby approved, comprising the construction of new dwellings or the residential conversion of retained buildings, shall be commenced until full details of a highway improvement at the access to the site at its junction with Holmfirth Road, and at the Holmfirth Road, Manchester Road, Chew Valley Road roundabout, has been submitted to and approved in writing by the Local Planning Authority. Details of construction, levels, drainage, lighting, and footway provision, with all associated signs and road markings, shall be included within the submitted scheme, along with details of management responsibility for future maintenance of the existing bridge structure across Chew Brook. The approved scheme shall be implemented in full prior to first occupation of any new dwellings hereby approved and the bridge management arrangements shall be retained thereafter. REASON – To ensure safe access into and out of the site, including the prevention of left turn manoeuvres into and right turn manoeuvres out of the site, in the interests of highway safety having regard to Policy JP-C8 of the Places for Everyone Joint Development Plan.

4. No development hereby approved, comprising the construction of new dwellings or the residential conversion of retained buildings, shall be commenced until full details of a new pedestrian bridge across Chew Brook, including management responsibility for future maintenance of the bridge structure, has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full prior to first occupation of any new dwellings hereby approved and shall be retained thereafter in accordance with the approved details. REASON – To ensure safe pedestrian access into and out of the site, having regard to Policies JP-C6 and JP-C8 of the Places for Everyone Joint Development Plan.

5. No dwelling shall be occupied until the access to the site and car parking space for that dwelling has been provided in accordance with the approved plan 3579 26 B and the details of construction, levels and drainage, which shall have been submitted to and approved in writing by the Local Planning Authority prior to the commencement of the construction of the access and parking spaces. Thereafter the parking spaces and turning areas shall not be used for any purpose other than the parking and manoeuvring of vehicles. REASON - To ensure adequate off-street parking facilities are provided and remain available for the development so that parking does not take place on the highway to the detriment of highway safety having regard to Policy JP-C8 of the Places for Everyone Joint Development Plan.

6. No dwellings shall be occupied until a scheme for the provision of secure cycle parking in connection with that dwelling, has been implemented in accordance with details which shall have previously been submitted to and approved in writing by the Local Planning Authority. The approved facility shall remain available for users of the development thereafter. REASON - In order to promote sustainable means of travel having regard to Policies JP-C6 and JP-C8 of the Places for Everyone Joint Development Plan.

7. Prior to the commencement of any development, the applicant shall submit a Construction Environmental Management Plan (CEMP) which details how any construction on site will be managed to control dust, noise and vibration so as not to

cause health and nuisance issues to the existing occupiers of residential and commercial sites close to the development. The plan shall reference the Institute of Air Quality Management's latest guidance on the assessment of dust from construction and demolition. The CEMP shall also include details of scheduling of deliveries, storage of plant and materials on site, car parking provision for contractors and employees, wheel-wash facilities and general phasing of the works. The CEMP shall be approved in writing by the Local Planning Authority before any development commences and, unless otherwise agreed in writing by the Local Planning Authority, any mitigation in the agreed CEMP shall be adhered to for the duration of any construction works. REASON - To prevent development that may result in unacceptable impacts on human health and the environment having regard to Policy 9 of the Oldham Local Plan.

8. No development, other than demolition works, shall commence unless and until a site investigation and assessment to identify the extent of land contamination has been carried out and the consultant's report and recommendations have been submitted to and approved in writing by the Local Planning Authority. Written approval from the Local Planning Authority will be required for any necessary programmed remedial measures and, on receipt of a satisfactory completion report, to discharge the condition. REASON - Prior approval of such details is necessary as they are fundamental to the initial site preparation works and in order to protect public safety having regard to Policy 9 of the Oldham Local Plan.

9. The development shall be carried out in accordance with the submitted Flood Risk Assessment (ref 5839/FRDA/Final/v1.0/2024-08-13) including that finished floor levels shall be set no lower than 166.65 metres above Ordnance Datum (AOD). These mitigation measures shall be fully implemented prior to occupation of a dwelling and retained thereafter, in accordance with the scheme's timing/phasing arrangements. The measures shall be retained and maintained thereafter throughout the lifetime of the development. REASON - To reduce the risk of flooding to the proposed development and future occupants having regard to Policy JP-S4 of the Places for Everyone Joint Development Plan.

10. Prior to the commencement of development, other than demolition, details of a sustainable surface water drainage scheme and a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The drainage schemes must include:

    (i) An investigation of the hierarchy of drainage options in the National Planning Practice Guidance (or any subsequent amendment thereof). This investigation shall include evidence of an assessment of ground conditions and the potential for infiltration of surface water in accordance with BRE365;

    (ii) A restricted rate of discharge of surface water agreed with the local planning authority (if it is agreed that infiltration is discounted by the investigations);

    (iii) Levels of the proposed drainage systems including proposed ground and finished floor levels in AOD;

    (iv) Incorporate mitigation measures to manage the risk of sewer surcharge where applicable; and

    (v) Foul and surface water shall drain on separate systems.

    The approved schemes shall also be in accordance with the Non-Statutory Technical

Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards.

Prior to occupation of the proposed development, the drainage schemes shall be completed in accordance with the approved details and retained thereafter for the lifetime of the development. REASON - To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution having regard to JP-S2 of the Places for Everyone Joint Development Plan.

11. No development, other than demolition, shall take place until a scheme for the provision and management of a 10-metre-wide buffer zone; excluding the existing access road; alongside the Chew Brook waterbody has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the Local Planning Authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from new built development including formal landscaping or new hardstanding, except for the retention/ improvement of the existing access road. The scheme shall include:

    - plans showing the extent and layout of the buffer zone free of any new hardstanding, parking areas or underground storage assets.
    - details demonstrating how the buffer zone and river will be protected during development's construction; including any potential road widening of existing access road;
    - details of any retained or proposed new soft landscaping along riparian corridor, including planting schedule.
    - detail of any new site surface water connections to river, preferably via a multifunctional sustainable urban drainage system.
    - details of any proposed new footpaths, or environmentally sensitive fencing or lighting arrangements etc. along key ecological network.

    REASON - In order to protect valuable wildlife alongside the watercourse and ensure this is protected and positively integrated as part of new riparian development having regard to Policy JP-G3 of the Places for Everyone Joint Development Plan.

12. No development, other than demolition, shall take place until full details of both hard and soft landscape works with an associated Landscape and Ecological Management Plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), has been submitted to and approved in writing by the Local Planning Authority. The hard landscape details shall include proposed finished levels or contours; means of enclosure; hard surfacing materials and street furniture, where relevant.

    The soft landscaping works shall include planting plans; including provision of replacement tree planting on a basis of 2 for 1 removed to facilitate the development, written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants and trees, noting species, plant/tree sizes and proposed numbers/densities and the implementation programme. All planting shall be implemented in accordance with the approved details in the first available planting season following the completion of the development, or such longer period which has previously been approved in writing by the Local Planning Authority and shall be maintained for a period of 5 years from the agreed date of planting.

Any trees or plants which die, become diseased, or are removed during the maintenance period shall be replaced with specimens of an equivalent species and size. REASON - Prior approval of such details is necessary as the site may contain features which require incorporation into the approved development, and to ensure that the development site is landscaped to an acceptable standard having regard to Policies JP-P1, JP-G7 and JP-G8 of the Places for Everyone Joint Development Plan.

13. Prior to the commencement of any development hereby approved, including land clearance works, a scheme of precautionary working methods for amphibians, reptiles, and mammals shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in full accordance with the approved working methods. REASON - In order to secure the protection of ecological interests within the site having regard to Policy 21 of the Oldham Local Plan and Policy JP-G8 of the Places for Everyone Joint Development Plan.

14. Prior to the commencement of any development, other than demolition, a detailed method statement for removing or the long-term management / control of all non-native and invasive species, including Himalayan Balsam, Japanese knotweed, Variegated Yellow Archangel, Wall cotoneaster & Rhododendron, identified on the site in the Preliminary Ecological Appraisal (Elton Ecology, 2025, JCA, May 2023), shall be submitted to and approved in writing by the Local Planning Authority. The method statement shall include proposed measures that will be used to prevent the spread of identified invasive species during any operations e.g. mowing, strimming, bank regrading or soil movement, and preferably look to eradicate from site where feasible and practical. It shall also contain measures to ensure that any soils brought to the site are free of the seeds / root / stem of any invasive plant covered under the Wildlife and Countryside Act 1981, as amended. Development shall proceed in accordance with the approved method statement. REASON - To prevent the spread of invasive plant species having regard to Policy 9 of the Oldham Local Plan.

15. No development comprising the erection of any external walls shall commence until a full specification or samples of the materials to be used in the construction of the external surfaces of the development, including the roof, have been submitted to and approved in writing by the Local Planning Authority. The Development shall be carried out in accordance with the approved details. The materials to be used throughout the development shall be consistent in terms of colour, size and texture with the approved details. REASON - To ensure that the appearance of the development is acceptable in the interests of the visual amenity of the area having regard to Policy JP-P1 of the Places for Everyone Joint Development Plan and Policy 20 of the Oldham Local Plan.

16. The development shall be implemented in accordance with the measures outlined in the Specifications for a Programme of Building Recording Investigation (Level II/III) submitted under application DEM/354504/25 and subject to:

    a) A programme for post-investigation assessment to include production of a final report on the results of the investigations and their significance.
    b) Deposition of the final report with the Greater Manchester Historic Environment Record.
    c) Dissemination of the results of the archaeological investigations commensurate with their significance, including the installation of an information panel that explains the historic interest in the mill.
    d) Provision for archive deposition of the report and records of the site investigation.
    e) Nomination of a competent person or persons/organisation to undertake the works set out within the approved Project Design.

REASON - To record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence (and any archive generated) publicly accessible having regard to Policy JP-P2 of the Places for Everyone Joint Development Plan Document.

17. Notwithstanding the plans hereby approved, the development shall be built to the accessible and adaptable standard in Part M4(2) of the Building Regulations, unless it is first demonstrated to and agreed in writing by the Local Planning Authority that the specific site conditions make this impractical. REASON - To ensure a sustainable form of development having regard to the requirements of Policy JP-H3 of the Places for Everyone Joint Development Plan.

18. Prior to the commencement of the construction of any building, details for demonstrating that the building shall be consistent with the 2022 Part L of the Building Regulations and with the measures in TABLE 5.1 of Places for Everyone Policy JP-S2, unless it can be demonstrated that it is not practicable or financially viable, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details. REASON - In order to secure a sustainable form of development having regard to Policy JP-S2 of the Places for Everyone Joint Development Plan.

19. No dwelling hereby approved shall be occupied until a statement has been submitted to and approved in writing by the Local Planning Authority to demonstrate how the provision of full fibre to premises connections have been incorporated into the development, unless shown to be technically unfeasible and/or unviable, along with multi-ducting complaint with telecoms standards, and the connections are operational and immediately available. REASON – To support the provision of affordable, high-quality, digital infrastructure having regard to Policy JP-C2 of the Places for Everyone Joint Development Plan Document.

SITE LOCATION PLAN (NOT TO SCALE)

