

**Oldham**

**Local**

**Plan**

# **Local Plan Review: Issues and Options**

**July 2021**



**Oldham**  
Council

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## 1 What is Oldham's Local Plan?

- 1.1** Oldham's Local Plan will guide development in the borough up to 2037. Upon adoption it will replace the current plan (Joint Core Strategy and Development Management Policies DPD) which was adopted in November 2011 and any saved planning policies from the Unitary Development Plan (UDP) 2006. The saved UDP policies that will ultimately be replaced by the Local Plan can be found in Appendix 1 and where appropriate they have been referred to in relevant sections throughout this document.
- 1.2** Underpinning the plan will be the principles of sustainable development, it will meet the needs of Oldham and its residents while also achieving high quality design, addressing climate change and increasing accessibility for all.
- 1.3** According to paragraph 8 of National Planning Policy Framework (NPPF) achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. The objectives are:
- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 1.4** Planning affects many aspects of our lives and our environment – from where we live, work, shop and how we spend our leisure time. In producing the Local Plan, we will not just consider land uses but we will also consider other issues that can be affected by land use, including health, education and community safety. It is important we get a wide range of opinions and views so that we can create the most rounded and effective plan possible.



- 1.5** The Local Plan covers the whole borough except that part which falls within the Peak District National Park.
- 1.6** This document is called Issues and Options and follows on from the consultation that was carried out in the summer of 2017, called the 'Regulation 18 Notification'<sup>(1)</sup>. It builds upon the comments we received and has been informed by on-going studies and pieces of evidence work. It describes the key challenges facing Oldham, sets out broad issues and presents options and questions that we need residents, businesses and interested parties in the borough to help us answer.
- 1.7** In particular we are seeking your views on:
- The issues Oldham, and your particular area of Oldham, faces;
  - What kind of place you would like Oldham to be in 15 years; and
  - Questions and options set out throughout the document that relate to specific areas of planning, such as the location of future housing, design of new buildings and protection of our open spaces.

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<sup>1</sup> This was an early stage in the Regulation 18 process where the council sought views about what the local community and stakeholders thought the Local Plan should contain, what the key planning issues for Oldham are and what the main aims of the Local Plan should be

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## 2 Policy and Legal Requirements

**2.1** The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the requirements for local authorities for producing and consulting on their Local Plan. There are various stages in the production of a Local Plan and Oldham Council is now at the “Regulation 18” stage. The Regulations allow for considerable flexibility to local planning authorities regarding how they carry out the initial stages of local plan production, provided they comply with the requirements set out in Regulation 18 and the council's adopted Statement of Community Involvement (SCI). As part of the initial stages of preparing the Local Plan the Issues and Options consultation provides the community and other stakeholders with an opportunity to shape the Local Plan based on the current and emerging evidence that has been gathered by the council.

**2.2** The following paragraphs provide a brief summary of the formal requirements associated with Local Plan making.

### **National Planning Policy Framework (NPPF, 2019)**

**2.3** The NPPF sets out the framework for the preparation of a Local Plan. It ensures that plans and decisions should apply a presumption in favour of sustainable development, and that plans should positively seek opportunities to meet the development needs of their area.

**2.4** Paragraph 16 of the NPPF states that Plans should be

- prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

**2.5** Paragraph 17 of the NPPF states that Plans must include strategic policies to address each local planning authority's priorities for the development and use of land in the area.

**2.6** Both strategic and non-strategic policies should be included in Local Plans. Strategic policies should set out the overall strategy for the pattern, scale and quality of development making provision for housing; infrastructure; community facilities; and conservation and enhancement of the natural, built and historic environment.



## Duty to Cooperate

- 2.7** Section 33A of the Planning and Compulsory Purchase Act 2004 seeks to maximise effective working on strategic issues by requiring local planning authorities "...to engage constructively, actively and on an ongoing basis..." with certain prescribed bodies, including neighbouring councils and organisations such as the Environment Agency and Natural England.
- 2.8** This "Duty to Cooperate" is a legal requirement which must be addressed in Local Plans, to demonstrate that the emerging plan has also taken account of needs which require a wider level of co-operation over a wider geographical area.
- 2.9** In Greater Manchester, nine of the ten Local Authorities are working together to produce a joint Development Plan Document (DPD), called 'Places for Everyone', Stockport is the tenth Local Authority, they withdrew from preparing Greater Manchester's Place for Homes, Jobs and the Environment (also known as the Greater Manchester Spatial Framework (GMSF)) in late 2020. As part of the process of preparing the joint DPD, the nine districts will be required to enter into dialogue with Stockport on matters of strategic, cross boundary significance. The outcome of which will need to be set out in a "Statement of Common Ground".
- 2.10** In relation to the preparation of the Local Plan, Oldham Council will engage with all the prescribed bodies and neighbouring councils to ensure that the Duty to Co-operate requirement is met.

## Integrated Assessment

- 2.11** The Local Plan will be supported by an Integrated Assessment (IA). The IA will include the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and a Health Impact Assessment (HIA). The Habitats Regulations Assessment (HRA) will still be a standalone document, however its findings will be integrated into the IA.
- 2.12** The role of an IA is to promote sustainable development through assessing the emerging Local Plan against economic, environmental and social objectives. It is a way of ensuring that the preferred approach in the Plan is the most appropriate when assessed against any reasonable alternatives. It also allows for any potential adverse effects to be identified and mitigated and for improvements to environmental, social and economic conditions to be made.
- 2.13** The Habitats Directive (2007) requires that a Local Development Document must be subject to a Habitats Regulations Assessment (HRA) (to be taken at least through the screening stage). This includes a Local Plan. The purpose of a HRA of land use plans is to ensure that protection of the integrity of European protected sites is an integral part of the planning process at the local level. The findings of the HRA will be integrated into the IA.
- 2.14** As part of the 'Regulation 18' Notification consultation that was carried out between July and August 2017 an IA Scoping Report was produced. That has been updated for Issues and Options and can be found [here](#)<sup>(2)</sup>.

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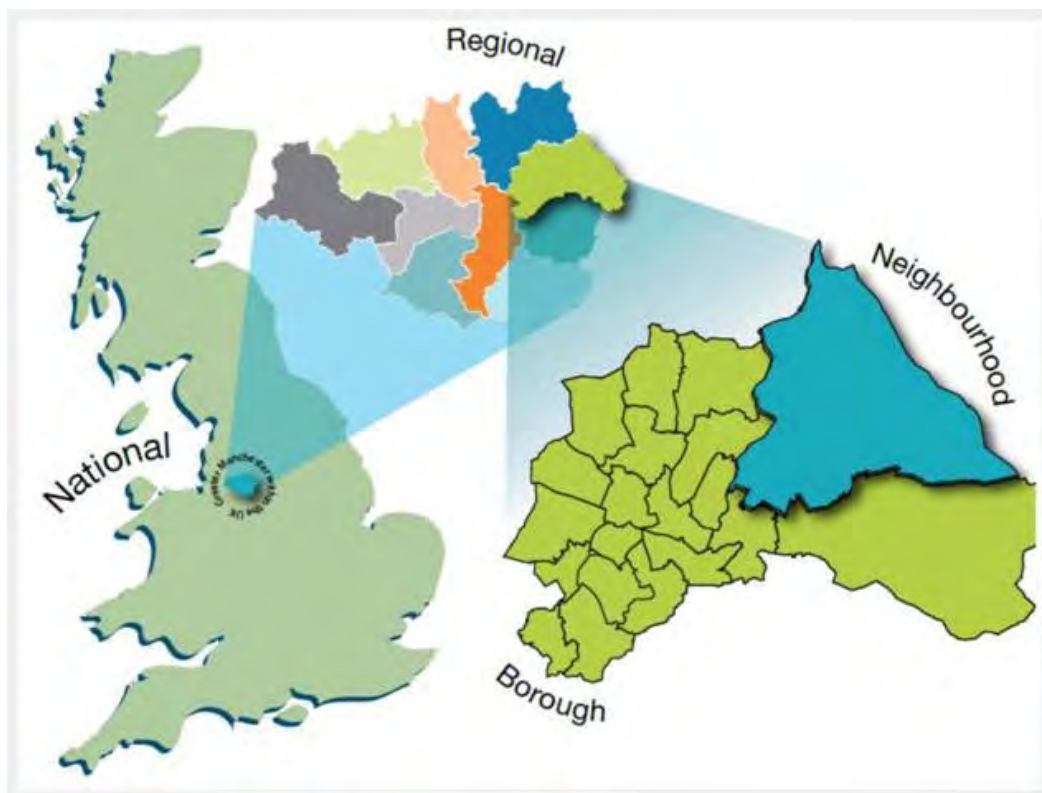
2 IA Scoping Report for Regulation 18 Notification [Local Plan Review](#) | [Local Plan Review](#) | [Oldham Council](#)



## 3 Local Plan Context

- 3.1** As well as the NPPF mentioned above the Local Plan needs to be in conformity with the different levels of planning that sit above it. This means that the Local Plan policies must comply with any policies that sit above it and cannot conflict with them. Here in Oldham that includes the emerging joint plan of the nine Greater Manchester districts, known as “Places for Everyone”, which upon adoption will form part of Oldham's Local Plan. Communities can also prepare Neighbourhood Plans for their area, these sit below the Local Plan and need to be in conformity with the strategic policies set within relevant Local Plan documents.

### Oldham Context: Nationally, Regionally and at a Neighbourhood Level



### Places for Everyone: A Joint Development Plan Document of Nine Greater Manchester Districts

- 3.2** Places for Everyone: A Joint Development Plan Document of Nine Greater Manchester Districts is being jointly prepared, following Stockport's decision to withdraw in late 2020. It will provide the land for jobs and new homes across the nine districts and upon adoption, Places for Everyone will form part of the Local Plan for Oldham.
- 3.3** The nine local Greater Manchester districts agreed that to address strategic matters such as housing need and economic growth as well as issues such as flood risk and strategic infrastructure, it would be best to work on a joint development plan - Places for Everyone. Places for Everyone will not cover everything that a Local Plan would cover and therefore there is still a need to produce a Local Plan for Oldham. This gives

us the opportunity to ensure that we are addressing issues that are specific to Oldham, the ones that matter to our residents and businesses and providing a positive local planning framework to address those local issues. Once Places for Everyone is adopted, all nine Local Plans will be required to be in general conformity with it. As the proposed Places for Everyone evolves, strategic policies can be reflected in draft Local Plans.

**3.4** Key areas from Places for Everyone affecting Oldham include:

- A review of the Green Belt boundary (As the review of the Green Belt boundary is being done at a Greater Manchester level the Local Plan will not address Green Belt boundary revisions);
- The designation of strategic sites;
- How much housing land is needed up to 2037;
- How much employment land is needed up to 2037;
- The importance of infrastructure, such as health, education, transport, green spaces, cultural facilities and utilities to support neighbourhoods and employment; and
- Ways to protect and improve the natural environment.

**3.5** The Local Plan does not cover minerals and waste planning as they are covered at a sub-regional level (outside of Places for Everyone). Under the provisions of the Planning and Compulsory Purchase Act 2004, the ten unitary authorities in Greater Manchester agreed to produce a Joint Waste Development Plan Document (the Waste Plan) for Greater Manchester and a Joint Minerals Development Plan Document (The Minerals Plan). The Waste Plan and the Minerals Plan were produced on behalf of the ten Greater Manchester authorities by the Greater Manchester Minerals and Waste Planning Unit. The Waste Plan was adopted in April 2012 and the Minerals Plan was adopted in April 2013.

**3.6** Places for Everyone will have some impact on existing policies contained within Oldham's currently adopted Joint Core Strategy and Development Management Policies DPD (the Local Plan). In order to assess the impact of Places for Everyone on the existing Local Plan policies, officers have looked at which policies within draft GMSF 2020 would have a material impact on policies contained within the Local Plan. A number of policies contained within the Local Plan are considered to be superseded, partially or in their entirety, by draft GMSF 2020. This assessment will be carried out again to align with Places for Everyone once it has been published. A copy of the assessment and the list of proposed policies to be superseded is contained within Appendix 2.

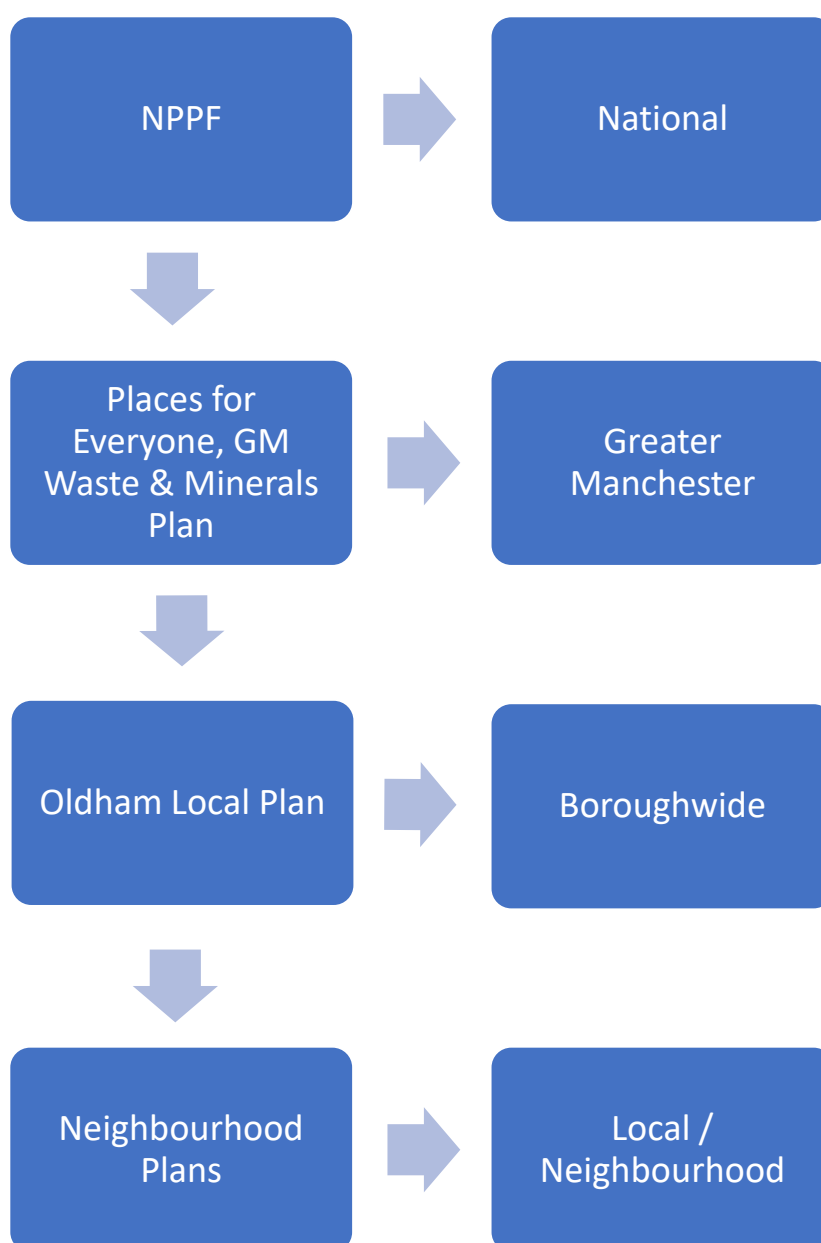
**3.7** In this document reference may be made to the Greater Manchester Spatial Framework (GMSF) Publication Plan Draft for Approval (draft GMSF 2020) as the latest published document.

## **Neighbourhood Plans**

**3.8** Communities can prepare Neighbourhood Plans for their community. In Oldham currently Saddleworth Parish Council are preparing Saddleworth Neighbourhood Plan and a proposed forum in Chadderton are in the process of applying for the designation of a Neighbourhood Area covering the three wards of Chadderton. The Neighbourhood Plan can have its own vision, objectives, strategy, non-strategic policies and allocations.

It must conform with, and positively support any strategic policies as set out in Places for Everyone and the Local Plan. Neighbourhood Plans once adopted will also form part of the Oldham Local Plan.

**3.9** The diagram below demonstrates how the different tiers of plans relate to one another.



## **Relationship to other relevant local plans and strategies**

- 3.10** The Local Plan must have regard to plans and strategies produced locally. This includes the Creating a Better Place agenda, The Oldham Plan and The Corporate Plan.

## **Creating a Better Place (Oldham Council, On-going, 2020)**

- 3.11** 'Creating a Better Place' incorporates significant programmes of work that have been progressed in order to set out a comprehensive vision and strategic framework for the borough. Creating a Better Place focuses on building more homes for our residents, creating new jobs through town centre regeneration, and ensuring Oldham is a great place to visit with lots of family friendly and accessible places to go.
- 3.12** This approach has the potential to deliver around 2,500 new homes in the town centre designed for a range of different budgets and needs, 1,000 new jobs and 100 new opportunities for apprenticeships, and is in alignment with Oldham Council's priority as part of Oldham's Green New Deal Strategy to be a smarter, greener and more enterprising place.
- 3.13** The aim is to provide a diverse housing offer that meets the needs of different sections of the population at different times in their lives. The proposals go beyond numbers alone with a focus on the significant contribution a good housing offer makes to quality of life with access to local services, shops and open green space.
- 3.14** Creating a Better Place was reviewed in August 2020 to confirm alignment with the borough's economic recovery and to consider the different projects' progression in support of the financial implications associated with COVID-19.

## **Draft Local Wealth Building Blueprint (Oldham Council, 2020)**

- 3.15** A draft Local Wealth Building Blueprint is in production. Community wealth building aims to harness the spend, assets and wealth of the council and other key 'anchor' institutions within the borough to bring benefits to both the local economy and directly to residents. The vision of this Blueprint is to "harness the spend, assets and wealth of the council and other key 'anchor' institutions within the borough to bring benefits to the local economy and directly to residents". It is supported by four pillars:
1. Progressive social value procurement - maximising social value and everything we spend to benefit local communities and residents.
  2. Workforce and fair employment - ensure our workforce is representative of the communities we serve.
  3. Land, assets and property for social good - increase how we make the best use of land and property for public good.
  4. Growing a social economy - create the conditions for more locally owned and socially minded enterprises to take hold and thrive in Oldham.
- 3.16** The Blueprint outlines a number of partners the council will work with to achieve the vision. The partners include:
- Northern Care Alliance;
  - Housing Partnership;
  - Oldham College;

- Oldham Community Leisure Trust;
- Action Together; and
- Greater Manchester Police.

**3.17** The Local Plan will have a key role to play in this piece of work as it progresses in all of the pillars, particularly in relation to Pillar 3 and making the best use of land and property.

#### **The Oldham Plan 2017-2022 (Oldham Council, 2017)**

**3.18** This is a corporate, overarching document and is a collective action statement explaining how to best serve the place we love and help its people, districts and businesses to thrive. The Oldham ambition is to be a productive and cooperative place with healthy, aspirational and sustainable communities. The delivery model is based around three shifts to deliver this ambition:

1. Inclusive Economy
2. Co-operative Services
3. Thriving Communities



**3.19** The Local Plan will contribute to delivering all of the ambitions by allocating sites for new homes and for businesses to expand and locate, working with communities to create a Local Plan that reflects the needs of their local areas and ensuring communities have open spaces to enjoy.

## The Corporate Plan

**3.20** Oldham's current Corporate Plan expired in December 2020. Work to refresh Oldham's Corporate Plan was due to be completed by summer 2020, however, the impact of the COVID-19 pandemic meant that this was no longer viable. Instead, we are in the process of developing our COVID-19 Recovery Strategy which will act as an interim Corporate Plan until at least 2022.

## COVID-19 Recovery Strategy

**3.21** As a Co-operative Council, Oldham is committed to tackling the impact of COVID-19, protecting our most vulnerable residents and communities. The steps we are taking to tackle the pandemic and the subsequent recovery planning, aim to support people, especially those groups who are often most impacted.

**3.22** Building on the learning so far and the anticipated events to come, we are developing a comprehensive Recovery Strategy, which will help shape our approach and vision for Oldham over the next eighteen months. We do this whilst we continue to respond to an ongoing critical incident where we are focused each day on saving the lives of Oldham's residents.

**3.23** The objectives and approach to our Recovery Strategy are rooted in the Oldham Model, ensuring as we adapt to a changing world that we build Thriving Communities, an Inclusive Economy and work Co-operatively with each other. The key objectives are:

- **Driving equality:** Oldham has a rich history of people from different backgrounds and cultures living and working together. However, we know that there are groups of people that are marginalised, who are more likely to face inequality and discrimination than others. As we recover from the impact of COVID-19 it is critical that we tackle inequality and discrimination head on. We will continue to identify and mitigate the equality impacts caused by the pandemic, informing our recovery planning through lived experience.
- **Investing in quality housing:** Poor-quality housing has a profound impact on health. The condition of homes, insecure tenure, and wider neighbourhood characteristics all have a considerable effect on health and wellbeing. Groups in the population who are more likely to live in poor housing are often the same groups who are vulnerable to COVID-19 and other health conditions. To tackle this, we will improve housing quality, both in and outside of the home, while bringing forward significant investment in new and affordable homes.
- **Championing a green recovery:** In Oldham, we want to respond to the impacts of coronavirus in a bold and ambitious way. We want to use this as an opportunity to stimulate a green recovery that accelerates our ambitions around reducing the boroughs carbon footprint and protecting our greenspace for residents to enjoy.
- **Creating and protecting jobs and supporting businesses:** Many businesses, especially across hospitality and retail, have been impacted by the COVID-19 pandemic, with repeated forced closures due to national and local lockdowns. We will continue to create good jobs for our residents, while supporting local businesses to restart and recover from the effects of the pandemic.
- **Prioritising education and skills:** The COVID-19 pandemic has had a huge impact on education and skills, with many young people needing support to 'catch up' in learning after several months of lockdown. We will work with schools and colleges to support children and young people to catch up and succeed in learning.



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We will also prioritise training for adults who have been made redundant, helping them retrain and secure employment.

- **Promoting health and wellbeing and supporting the most vulnerable:** We will continue to promote and improve the health and wellbeing of our communities, contain the spread of COVID-19 locally and target action to protect our most vulnerable residents and communities.

**3.24** Each of these focus areas will form a key plank of the COVID-19 Recovery Plan, with individual actions and performance targets attached to each priority area. The Plan will reflect the difficult and challenging times ahead and the opportunities that are arising as we recover from the pandemic as Team Oldham. The Plan will also set out how we can embrace the ‘new normal’ to build a stronger local economy, increase community resilience and public participation, support our local health system, and support our most vulnerable residents.

**3.25** There are a number of other key documents that the Local Plan will reflect and embed. These include (but are not exhaustive):

- The Housing Strategy;
- Oldham Town Centre Visioning work;
- Oldham Education Provision Strategy;
- Oldham’s Green Deal Strategy; and
- Oldham’s emerging Cultural Strategy.

**3.26** Further details on these plans and strategies can be found in the thematic topic papers produced alongside this Issues and Options document.



## 4 You said, We Did

- 4.1** To begin preparation of the Local Plan the council carried out a 'Regulation 18' Notification between July and August 2017. To inform this work we asked what the local community and other interested parties thought:
- the Local Plan should contain and what the key planning issues are for Oldham; and
  - what, in broad terms, should be the main aims of the Local Plan.
- 4.2** Alongside the Regulation 18 Notification we published our Integrated Assessment Scoping Report and invited the Environment Agency, Historic England and Natural England to comment on the scope of the Local Plan. This was also available for the local community and stakeholders to view and comment on if they wished.
- 4.3** In addition, responses to other consultations have fed into this Issues and Options document, including consultations on the Oldham Town Centre Masterplan in the Autumn of 2017, the Housing Strategy throughout 2018, Places for Everyone and the Oldham Town Centre Conservation Area Appraisal and Management Plan SPD (CAAMP) in 2019. All of the comments received on these key pieces of work have been incorporated into the issues and helped to formulate the options and questions set out in this document.
- 4.4** Some of the key messages that arose from the Regulation 18 Notification consultation were:

Key Issue
Relationship with other plans: <ul style="list-style-type: none"><li>• Need to make clear how the Local Plan will relate to GMSF (now Places for Everyone) and how delination will be made between strategic and non-strategic policies.</li><li>• Need to support Saddleworth Neighbourhood Plan.</li></ul>
Green Belt and rural policies: <ul style="list-style-type: none"><li>• Oppose the release of Green Belt for development needs.</li><li>• The Local Plan should allocate non-strategic sites at the micro level for development.</li><li>• Need to allow the development of low quality Green Belt or safeguarded land.</li><li>• The Local Plan should identify land to be safeguarded for future development needs.</li><li>• Green Belt policies should remain strong.</li><li>• There is a need for rural policies.</li></ul>
Other Protected Open Land: <ul style="list-style-type: none"><li>• Oppose loss / development on Other Protected Open Land (OPOL).</li><li>• OPOL sites need to be reviewed and either fully / partly released for development.</li></ul>
Brownfield land: <ul style="list-style-type: none"><li>• Preference for development on brownfield land first before greenfield land.</li><li>• Mills and vacant buildings / land should be used for redevelopment.</li><li>• The need to establish a brownfield register.</li></ul>
Transport Infrastructure - Congestion:

Key Issue
<ul style="list-style-type: none"> <li>Concerns around traffic / congestion and road safety.</li> </ul> <p>Sustainable transport:</p> <ul style="list-style-type: none"> <li>Improvements in walking and cycling infrastructure needed.</li> <li>The need for frequent reliable public transport.</li> <li>Housing should have electric vehicle charging points.</li> </ul>
<p>Accessibility needs to be addressed:</p> <ul style="list-style-type: none"> <li>Footpaths and pavements need to be planned for wheelchair users.</li> <li>Some areas have no / very narrow pavements.</li> <li>Need more disabled car parking spaces.</li> <li>Buildings need to be accessible to wheelchair users.</li> </ul>
<p>Green Infrastructure:</p> <ul style="list-style-type: none"> <li>The need to maintain and enhance green infrastructure, including nature designations and provide safe open space, including recreation facilities, to deliver a wide range of benefits.</li> <li>Impacts from development on biodiversity need to be considered.</li> <li>Landscape character must be protected, conserved and enhanced.</li> </ul>
<p>Social Infrastructure:</p> <ul style="list-style-type: none"> <li>Concerns around social infrastructure e.g. school places, health care , leisure centres etc.</li> </ul>
<p>The need for other infrastructure:</p> <ul style="list-style-type: none"> <li>Electricity, gas, water and sewerage.</li> <li>Broadband - the need to improve broadband speeds.</li> </ul>
<p>Housing type:</p> <ul style="list-style-type: none"> <li>The need for affordable and social housing that meet local need.</li> <li>Size, type and tenure are important considerations.</li> <li>No need for executive style homes.</li> <li>Do not wish to see a lot of high tower accommodation.</li> <li>Need housing for older people wishing to downsize.</li> <li>The need for adapted homes for people with disabilities.</li> <li>Need to tackle homelessness and homes for younger people.</li> <li>Need to address the impact of Houses of Multiple Occupation.</li> </ul>
<p>Housing numbers:</p> <ul style="list-style-type: none"> <li>Figures need to be revisited.</li> <li>Supply of housing land should be increased.</li> <li>Need to demonstrate sites are deliverable.</li> <li>Need a combination of large and small sites to deliver housing.</li> </ul> <p>Locations:</p> <ul style="list-style-type: none"> <li>Need to be in accessible locations and next to public transport.</li> </ul>

Key Issue
<ul style="list-style-type: none"> <li>Town centres can be redeveloped for higher density housing that respects landscape and character.</li> <li>Consider proximity to wastewater treatment works as could have adverse impacts.</li> <li>Consider sites previously used for employment.</li> </ul>
<p>Employment:</p> <ul style="list-style-type: none"> <li>Need to rethink the industrial strategy, considering the location to Manchester. Do not need more warehouses.</li> <li>The need for job creation and economic growth that matches growing sectors;</li> <li>Support digital businesses.</li> <li>Need a range of employment sites in suitable locations.</li> <li>Support small businesses and technology companies in Saddleworth.</li> </ul>
<p>Centres and retail:</p> <ul style="list-style-type: none"> <li>Must define hierarchy of centres and define extent of centres and primary shopping areas.</li> <li>Retail study needs updating.</li> <li>Need to ensure appropriate provision of retail.</li> <li>The need for shops - independent and national.</li> <li>New retail should not leave existing buildings derelict. Impact on traffic should be a defining factor.</li> <li>Should invest in smaller local centres and introduce new retail areas to support neighbourhoods where there is no retail provision.</li> <li>Support mixed use developments.</li> <li>Need high quality amenities.</li> <li>Need to provide parking and improve local transport to encourage residents to shop local.</li> <li>Too many fast food shops.</li> <li>Need to introduce Article 4 directions.</li> </ul>
<p>Culture:</p> <ul style="list-style-type: none"> <li>The need to safeguard and promote culture activities and venues.</li> <li>The need to promote tourism</li> </ul>
<p>Heritage:</p> <ul style="list-style-type: none"> <li>Heritage is an asset in the borough and should be used to enhance the borough and protect distinctiveness.</li> <li>Need to ensure the conservation and enhancement of the historic environment.</li> <li>Need to ensure new sites do not have an adverse impact on heritage assets.</li> </ul>
<p>Design:</p> <ul style="list-style-type: none"> <li>Need to reduce crime and anti-social behaviour.</li> <li>Housing must be in keeping with the area.</li> <li>Need to be careful not to spoil adversely impact areas.</li> <li>Development should have to meet standards such as BREEAM.</li> <li>Design policies should not be too prescriptive.</li> </ul>

Key Issue
<p>Flood Risk and water quality:</p> <ul style="list-style-type: none"> <li>• Development should not take place in areas prone to flooding.</li> <li>• Water storage should take place in the uplands.</li> <li>• Impermeable surface water run off must be considered. Sustainable drainage encouraged.</li> <li>• Need to consider Groundwater Source Protection Zones.</li> </ul>
<p>Climate Change and Energy:</p> <ul style="list-style-type: none"> <li>• High energy efficiency and renewable energy sources should be imposed on new developments. Affordable warmth is important.</li> <li>• Support for larger renewable / low carbon energy schemes.</li> <li>• There is poor air quality.</li> </ul>
<p>Health:</p> <ul style="list-style-type: none"> <li>• Issues of obesity, mental health and well being, loneliness and inequalities across the borough.</li> <li>• Impacts from air quality.</li> </ul>
<p>Communication:</p> <ul style="list-style-type: none"> <li>• Issues raised over consultation techniques</li> <li>• Website is dated and unhelpful.</li> </ul>

**4.5** Further details on the comments received as part of the Regulation 18 consultation can be found within thematic topic papers and the Regulation 18 Schedule of Comments Received. In addition the full comments received can be viewed [here](#)<sup>(3)</sup> on the council's consultation website.

**4.6** This Issues and Options document has considered the comments made at the Regulation 18 consultation and used them to help inform the identified issues and formulate more targeted questions and options for consultation.

<sup>3</sup> The council's consultation website can be viewed here: [Oldham Council - Local Plan Review \(objective.co.uk\)](https://www.oldham.gov.uk/objective.co.uk)

## 5 Community Participation

### Commenting on the Issues & Options and the Integrated Assessment

- 5.1** Comments are invited on Issues and Options and the Integrated Assessment over an eight-week period from 5 June to 29 August 2021.
- 5.2** The council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at <http://oldham.objective.co.uk/portal/>.
- 5.3** Alternatively, comments can be emailed to [SPI.Consultations@oldham.gov.uk](mailto:SPI.Consultations@oldham.gov.uk) or returned by post to the following address no later than by 5pm 29 August 2021.

Strategic Planning and Information

Economy, Skills and Neighbourhoods

Room 310, Level 3, Civic Centre

West Street,

Oldham

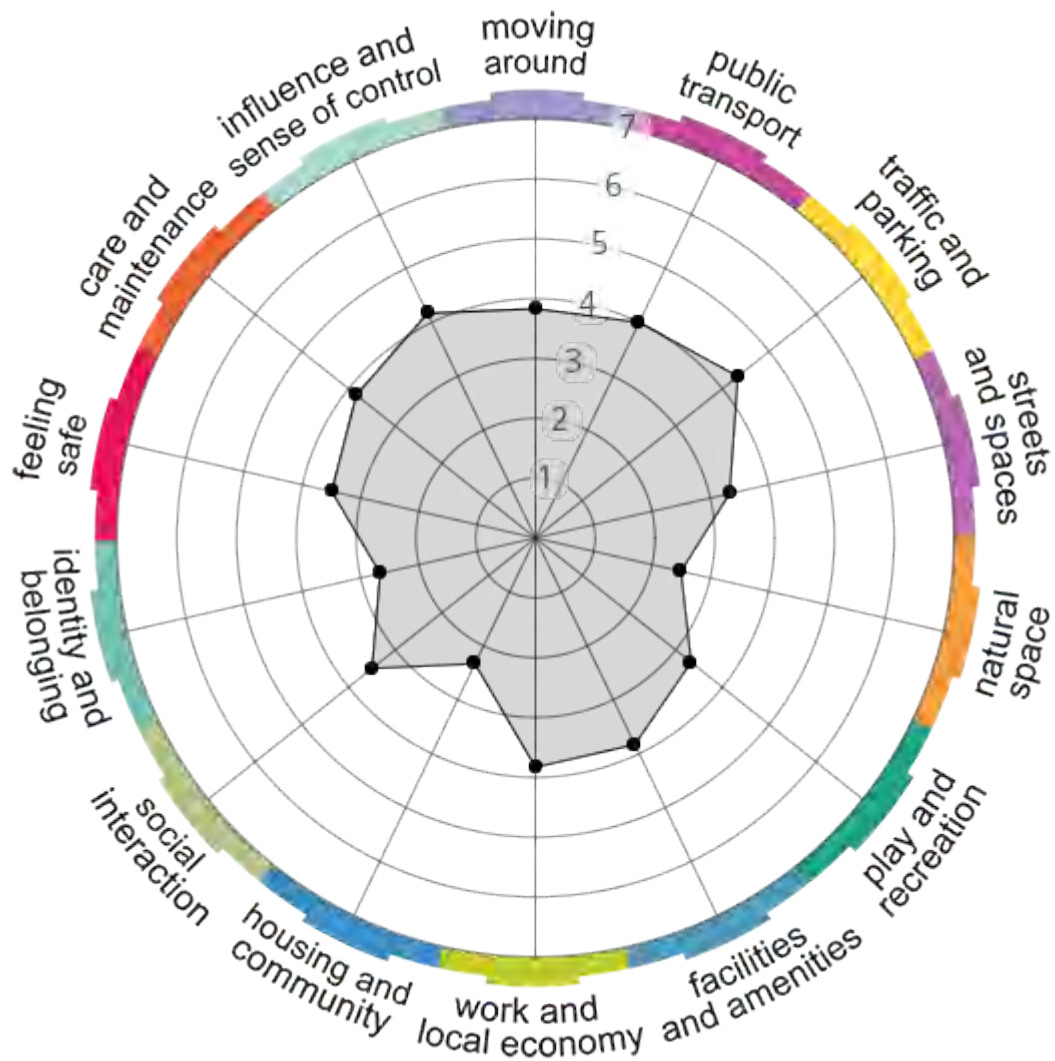
OL1 1UH

- 5.4** Please note all comments will be held by the council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.
- 5.5** Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the council's website at [https://www.oldham.gov.uk/info/200585/local\\_plan/1825/consultation](https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation).

### Place Standard Tool

- 5.6** In addition to responding to the the specific questions within this Issues and Options document and the other supporting documents, the council are keen to understand the views people have regarding their local environment, in particular what works well and what needs to be improved.
- 5.7** A Place Standard tool has been set up so that residents and businesses of Oldham can tell us what they think about certain elements of their area (such as public transport, housing, feeling safe, care and maintenance). The tool is made up of 14 questions which cover aspects to do with the physical and social elements of a place. Prompts are provided and there is an opportunity at the end to identify the top priorities. Every response will be individual and anonymised and the responses will be fed in to the assessment tool in order to give an overall 'spider diagram' which will help demonstrate what people think of their area. An example of the outputs of a Place Standard tool is below, the smaller the shaded areas in the spider diagram the more that people feel this part of their community needs improving and the fuller the shaded areas the happier people are with that element of their community.

### An example Place Standard Assessment



- 5.8 The feedback from the Place Standard tool will be used to help shape planning policy and inform the review of the Local Plan.
- 5.9 For more information on the Place Standard tool and to complete the assessment, please see the Place Standard page of the council's website [here](#) <sup>(4)</sup>.

4 The Place Standard tool can be viewed here: [Local Plan Review | Local Plan Review | Oldham Council](#)





## 6 Context

- 6.1** Oldham is situated in the northeast of Greater Manchester. It covers an area of 55 square miles. Our neighbouring boroughs are Rochdale, Manchester, Tameside, Peak Park, Kirklees and Calderdale. The borough is made up of the town of Oldham and the areas of Chadderton, Failsworth, Hollinwood, Royton, Shaw and Crompton and Saddleworth and Lees. It has a real rural and urban mix, reaching from within five miles of Manchester City Centre, to the moorlands of Saddleworth, with almost a quarter of the borough within the Peak District National Park.

**Oldham and its surrounding areas**



## 7 Population and Housing

- 7.1** Oldham is home to around 237,110 residents who live across five districts and twenty wards and make up 8.3% of Greater Manchester's population <sup>(5)</sup>. The borough has a higher proportion (22.5%) of Black and Minority Ethnic (BME) residents than in Greater Manchester (16.3%), the North West (9.8%), and England (14.6%) <sup>(6)</sup>. The ethnic composition in Oldham currently stands at 71.2% White, 11.8% Pakistani, 8.6% Bangladeshi and 8.4% 'other', according to Oldham Council's 2020 population projections. Equality and diversity are embraced within Oldham and the number of ethnically diverse communities continue to grow. This diversity is reflected within schools, with over 90 different languages recorded as being spoken <sup>(7)</sup>. Oldham brings together a variety of cultures and is proud of the uniqueness that this brings to the borough.
- 7.2** The borough has a relatively young population, with a high proportion (22.5%) of residents aged under 16 and proportionally fewer (16.2%) aged 65 and over. Whilst Greater Manchester has a lower proportion of residents aged under 16 (20.5%) and a higher proportion of residents aged over 65 (15.9%) <sup>(8)</sup>. It's increasing population profile is a result of improving life expectancy, internal migration and the growth in Pakistani and Bangladeshi communities. Projections show that Oldham's population will reach 255,200 by 2041; a 9.2% increase from 2017.
- 7.3** In general, the people of Oldham have poorer health than the England average. Significant inequalities in health outcomes across the borough continue to be seen, for example inequalities in smoking prevalence and the health effects of smoking.
- 7.4** Oldham's Housing Strategy, stated that Oldham has the highest proportion of pre-1919 terraced homes in Greater Manchester (41%) and they are concentrated in the parts of the borough that show the greatest levels of disadvantage and deprivation. Oldham also has a high proportion of properties in lower council tax bands, with 70% of homes in band A or B category <sup>(9)</sup>. Levels of overcrowding are high and there is a legacy of historic low supply of new larger family accommodation. Younger people (aged 20-29) are leaving the borough to live elsewhere.

**Table 1 Council Tax Band Percentages, Oldham Council, 2020**

Council tax bands in Oldham	A	B	C	D	E	F	G	H	T
% of properties (May, 2020)	52.2%	17.8%	16.8%	7.2%	3.4%	1.6%	0.9%	0.1%	0.02%

- 7.5** The borough has lower than average, and falling, home ownership levels compared to Greater Manchester and England. This is due to persistent outward migration of more economically active groups and an increase in buy to let purchases. The number of privately and socially rented housing has risen in Oldham especially in deprived regions of Oldham.

5 ONS, 2019

6 Census, 2011

7 School Census 2020

8 ONS, 2019

9 Oldham Council Tax Data May, 2020

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- 7.6** As part of the council's Creating a Better Place agenda there is an aim to provide a diverse housing offer that meets the needs of different sections of the population at different times in their lives. The proposals go beyond numbers alone with a focus on the significant contribution a good housing offer makes to quality of life. For example, helping an older person to meet their need for a smaller more manageable home which, with the right adaptations, can protect and enhance independence.

## 8 Economy and Employment

- 8.1** There are over 6,580 businesses in Oldham<sup>(10)</sup>, employing 101,200 people according to the Annual Population Survey<sup>(11)</sup>. Those businesses span key growth sectors including advanced manufacturing, health and social care, construction, education, digital and creative and financial and professional services. The borough is home to a number of well-known and high profile businesses including Trinity Mirror Group, Diodes Incorporated, Ferranti Technologies, Seton Healthcare Ltd, Park Cake Bakeries, Innovative Technologies, Ambassador Textiles, and Nov Mono Pumps. There is a higher proportion of microbusinesses (less than 9 employees) than elsewhere and 19.4% of jobs in the borough are provided by the Oldham Council and NHS Organisations<sup>(12)</sup>.
- 8.2** The unemployment rate in Oldham currently stands at 10% as of March 2021, compared to 8% within Greater Manchester and 6.6% in England<sup>(13)</sup>. The borough's economy is under-performing; Gross Value Added (GVA) per head for Oldham is the fourth lowest in Greater Manchester<sup>(14)</sup>. However, there is a stark contrast in terms of wealth across Greater Manchester, with the five local authorities with the lowest GVA accounting for 30.4% out of a total of £65.2 billion across all of Greater Manchester, meaning that the other five authorities account for nearly 70% of the GVA. This demonstrates a big imbalance across Greater Manchester, one that needs to be addressed if Oldham is to benefit from its position in Greater Manchester.
- 8.3** Oldham's overall rank in the Indices of Multiple Deprivation (IMD) has maintained a clear downward trend since 2004, relative to other authorities. The worsening of the 'extent' rank may indicate that deprivation (relative to other areas rather than in absolute terms) is taking on a wider geographic scope across Oldham. Pockets of deprivation are particularly concentrated around the inner Oldham area. The borough is the 19th most deprived local authority area<sup>(15)</sup> in the country, with five Lower Super Output Areas (LSOA's) sitting within the worst 1% nationally, one more than in 2015 with the addition being parts of Littlemoor/Greenacres.

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10 ONS, 2019

11 ONS, 2019

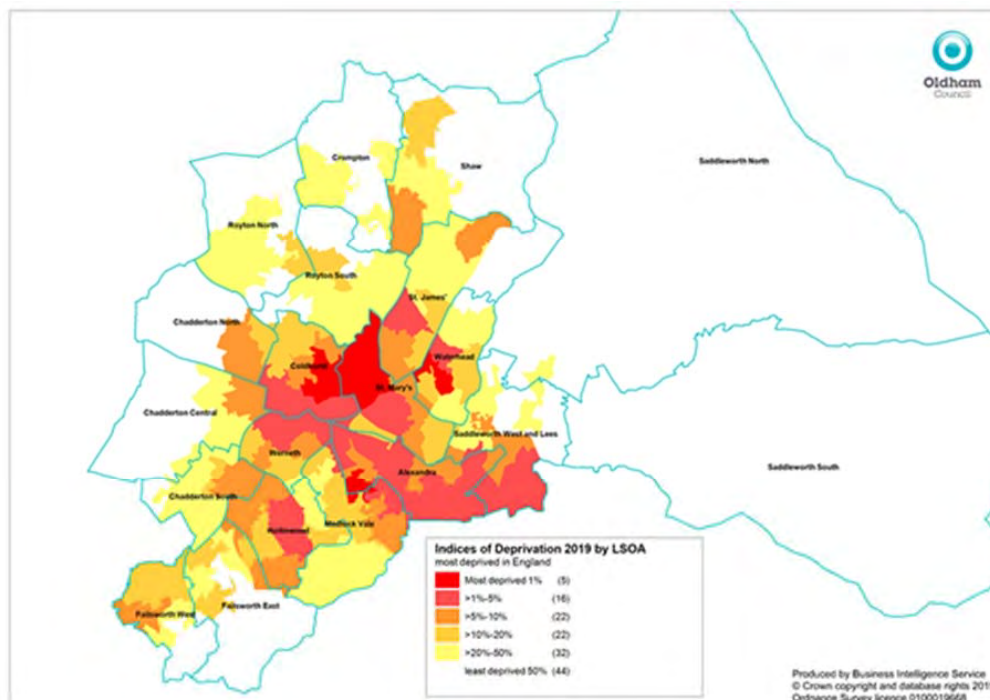
12 Business Register and Employment Survey, 2018

13 Oldham Monthly Labour Market Report, April 2021

14 Oldham LEA, 2019

15 IMD 2019

### Lower Super Output Areas in Oldham by rank 2019



- 8.4** The median household income for Oldham in 2019 was £25,335, which is below Greater Manchester (£27,663) and national (£30,661) levels <sup>(16)</sup>. Oldham has traditionally had a weak skills base, a legacy of generations of manual employment, which means Oldham residents have found it difficult to enter new growth sectors in recent years. In relation to GCSE's Oldham had the 3rd lowest percentage of pupils leaving school with 5 GCSE's (grades 9 to 5) in Greater Manchester and is also below the national average. In addition, Oldham has the highest percentage of adults (aged 16-64) in Greater Manchester with no qualifications, which is a major issue for Oldham. Working age people with no qualifications find it more challenging to find work, especially work that is well paid.

16 Annual Survey of Hours & Earnings, 2019



### Parliament Square, Oldham Town Centre



- 8.5** The council's ambitions for Oldham Town Centre aim to create a more vibrant, revitalised centre that plays a greater role in Greater Manchester. Oldham's cultural offer includes Gallery Oldham which has collections of regional and national importance, a variety of museum collections, archives and arts, the Oldham Theatre Workshop and libraries. Gallery Oldham continues to attract a high number of visits with visitors enjoying the fantastic range of exhibitions and events on offer.
- 8.6** In relation to tourism, Oldham has two distinct areas that make up the main tourist destinations, Oldham Town Centre and Saddleworth. Oldham Town Centre has attractions such as Gallery Oldham, The Coliseum and a growing evening economy around Odeon Cinema and a number of independent restaurants. Saddleworth's attractions include Saddleworth Museum and Gallery, Uppermill village, the Huddersfield Narrow Canal and the open countryside leading to attractions such as Dove Stone reservoir. A number of successful events are held annually in the borough including Santa's Reindeer Parade which attracts on average around 9,000 visitors, the Big Bang Bonfire display and Illuminate, a late night arts festival, which attracts performers from all over the world.
- 8.7** As part of the council's Creating a Better Place agenda there is a new vision for Oldham Town Centre which recognises that the purpose of town centres is changing at scale and pace linked to the convenience of shopping online at home and the popularity of out of town retail parks. This contributes to a cycle of disappearing shops, reduced visitor numbers and a potential rise in anti-social behaviour. The vision for Oldham Town Centre is aligned with national, regional and local priorities by ensuring that it has a focus for everyone as a place to live, work, visit and enjoy. Oldham's approach will strengthen the town centre as a cultural destination while bringing new homes, jobs and business opportunities.

## 9 The Natural Environment

- 9.1** Over half of the borough is open land that provides an attractive setting to built up areas and is an important natural resource supporting agricultural, tourism and recreational activities.
- 9.2** The majority of the open land is designated Green Belt or locally protected open countryside. River valleys and waterways, including the Rochdale Canal corridor and the Huddersfield Narrow Canal, provide habitats and corridors for wildlife, as well as opportunities for recreation, tourism and regeneration.
- 9.3** There is also a range of nature conservation areas, from international through to those of local importance. Oldham has one Special Protection Area (SPA) for rare and vulnerable birds (South Pennine Moors).
- 9.4** Oldham has five Sites of Special Scientific Interest (SSSIs) within the borough. They are listed below, along with their 'condition' <sup>(17)</sup>:
- Rochdale Canal (26.37ha). Site is 100% unfavourable - recovering (2010);
  - South Pennine Moors (20,944 ha). Site is 1.16% favourable and 94.68% unfavourable recovering and 4.16% unfavourable;
  - Standedge Tunnel (3.6ha). Site is 100% favourable condition (2010);
  - Ladcastle and Den Quarries (2.7 ha). Site is 100% favourable condition (2011); and
  - Lowside Brickworks (1.4 ha). Site is 100% favourable condition (2012).
- 9.5** In addition, there are currently 38 Sites of Biological Importance (SBIs) across the borough, one Local Nature Reserve (Glodwick Lows) and one Regionally Important Geodiversity Site (RIGS) at Glodwick Brickpit.
- 9.6** There are also areas of ancient woodland within Oldham.

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<sup>17</sup> Natural England's objective is to achieve 'favourable condition' status for all SSSIs. Favourable condition means that the SSSI's habitats and features are in a healthy state and are being conserved by appropriate management.



### Glodwick Lows, Oldham



- 9.7** The South Pennine Moors, which is designated a SPA and SAC, as well as a SSSI and SBI, has the highest degree of international importance for birds and habitats. The Moors for the Future Partnership, established in 2003, is dedicated to preserving 8,000 years of moorland history. Moors for the Future have been working to reverse more than 200 years of damage that left large areas of these uplands bare of vegetation.
- 9.8** Pennine Prospects are in the process of developing a new non-statutory uplands park, known as The South Pennines Regional Park. Parts of Oldham are included within this and the aim is to have a management plan that reflects the importance of investing public money for public good. It is described as 'a landscape for the future, a space for everyone and a distinctive local economy'.
- 9.9** Northern Roots, is a project in Oldham which will create the UK's largest urban farm and eco-park on Snipe Clough, 160 acres of green space in the heart of Oldham. The aim is to develop Northern Roots in a way that creates jobs, skills and business opportunities for local people, while preserving and enhancing the biodiversity and environmental value of the site. It will be developed for and with local communities, supporting a wide range of activities and businesses. This will include growing edible crops at scale, animal husbandry and bee-keeping, forestry, mountain biking, outdoor events and performances, and much more. The ambition is that Northern Roots will become self-financing in the longer term through a blend of social investment, enterprise, tourism, licensing and commissioning.



**9.10** Green Infrastructure provision helps to underpin people's quality of life. It has a key role to play in the protection of the environment: supporting biodiversity, habitats and nature conservation; and combating the effects of climate change. The borough has a number of large, attractive parks including Alexandra and Dunwood and boasts a wide range of green spaces, such as Daisy Nook Country Park and Tandle Hill Country Park.



## 10 The Built Environment

**10.1** Heritage and conservation is very important within the borough. There are 36 conservation areas totalling around 255 hectares, 549 listed buildings, three registered parks and gardens and two registered scheduled monuments, all of which contribute to the character and local distinctiveness of the borough. The Heritage at Risk Register is the tool used for the Heritage at Risk campaign to save historic sites and places from decay, neglect and inappropriate development. In Oldham there are ten entries on Historic England's "At Risk" Register, including Oldham Town Centre Conservation Area.

**Oldham Parish Church within Oldham Town Centre Conservation Area (photo credit: Jody Hartley)**



**10.2** Oldham Town Centre has a high number of listed buildings and numerous buildings which make a positive contribution to the character of the town centre and conservation area. The high number of listed buildings and buildings of positive townscape character offers the opportunity for heritage-led regeneration, within the core of the town centre, as seen with the restoration of the Old Town Hall, a Grade II Listed Building, into a new 805-seat Odeon cinema with restaurants, which opened in November 2016.

**10.3** The council adopted the 'Oldham Town Centre Conservation Area Appraisal and Management Plan Supplementary Planning Document' (SPD) in August 2019. The appraisal and management plan was a high priority due to the conservation area being "at risk". The SPD proposed four extensions to the conservation area, which have been designated under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. A plan showing these extensions can be found in Appendix 3. However, these will need to be formally adopted through the Local Plan review to carry more weight in planning decisions and enforcement action. The SPD provides further

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guidance on the relevant policies contained within the current Local Plan, will provide up to date evidence to inform the Local Plan review and its implementation and will also support the regeneration plans for Oldham Town Centre.

## 11 Transport

- 11.1** Oldham has good transport connectivity with its road and motorway network links, including the A62, A627 (M), A663, A671, A669, A635 and easy access to the M60 and M62. These transport links offer locational advantages for the borough with opportunities for accessing two major centres of importance, Manchester and Leeds, and also Manchester Airport.
- 11.2** Pollution from road traffic is the most significant cause of poor air quality, with sections of the A62, A627, A663 and the M60 the worst affected in the borough.
- 11.3** The Oldham Metrolink system opened as far as Mumps in June 2012, Shaw & Crompton in December 2012 and Rochdale Railway Station in February 2013. It operates from Rochdale, through to Oldham town centre into Manchester City Centre where the network links to Bury, Media City, Manchester Airport, Tameside, Eccles, Altrincham and East Didsbury. Park and Ride facilities within Oldham are located at Shaw, Derker, Mumps and Hollinwood. There are also Cycle Hubs at Mumps and Hollinwood. The rail network in Oldham provides connections to West Yorkshire and Manchester and beyond, with railway stations at Mills Hill and Greenfield. Oldham also has two Quality Bus Corridors at Manchester-Oldham-Saddleworth (A62/A669) and Rochdale-Oldham-Ashton (A671/A627). These public transport links are very important to ensure accessibility and sustainable development and also to Oldham's economic and social prosperity, even more so as car ownership in the borough is below the national average.

**Oldham Central Tram Stop, Union Street, Oldham**



- 11.4** A Strategic Outline Business Case and concept design for a Quality Bus Transit (QBT) project connecting Rochdale, Oldham and Ashton has been commissioned by Transport for Greater Manchester (TfGM) as part of Greater Manchester's Streets for All programme. Streets for All is Greater Manchester's approach to re-thinking the role of streets in creating sustainable, healthy and resilient places. The route is a 15km road corridor that holds one frequent bus along its length (the 409 between Rochdale - Oldham - Ashton). It is expected that the commission will identify proposals to improve highway facilities for buses along this whole corridor, with a focus on improving bus reliability, quality, supporting more active travel and integration into the urban realm. This is expected to create opportunities to deliver bus priority measures, such as bus lanes and bus gates, as well as possibilities to reduce stop frequency (where appropriate). Opportunities to improve the walking, cycling, and general traffic environment along the corridor should also be identified where these support project aims.





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## 12 Vision for Oldham

**12.1** This spatial vision interprets the council's objectives and those of its partners and describes how the borough will change in the next 15-20 years. In Oldham, there will be a focus on creating a better place by building more homes for our residents, creating new jobs through town centre regeneration, and ensuring Oldham is a great place to visit with lots of family friendly and accessible places to go.

**Spatial Vision for Oldham: A co-operative place, where our communities thrive, and our economy is inclusive.**

**12.2** This Vision for Oldham is that by 2037 the borough will have thriving communities where quality is at the heart of decisions taken, where people are healthy and can make positive choices.

**12.3** Oldham will mitigate, adapt and be resilient to climate change. The council will achieve carbon neutrality by 2025 and carbon neutrality for the borough will be achieved by 2030. Oldham will have supported the Greater Manchester ambition to be one of the leading green cities in Europe and the drive to achieve zero carbon homes. Developments will be designed to maximise energy efficiency and make use of suitable low carbon and renewable energy opportunities. This will include building on the success of developments such as the one at Primrose Bank where each new home will feature state-of-the-art renewable energy equipment.

**12.4** Oldham will have delivered around 13,500 new high-quality homes of different sizes and types, including affordable housing, to meet the needs of Oldham's diverse community and build improved neighbourhoods.

**12.5** Oldham will be a key contributor to Greater Manchester's economy. A place where local businesses are supported to thrive and grow, and new businesses are attracted to invest in. Where every resident is enabled to contribute to, and benefit from, economic growth of the city region providing significant progress in living standards, wages and skills for everyone in Oldham. We will achieve this by offering a range of employment sites along with the necessary infrastructure for existing and new businesses and ensuring we provide opportunities suitable to meet the needs of our key growth sectors.

**12.6** Oldham's transport system will help the local economy prosper allowing our residents to fully contribute to and benefit from job opportunities within Oldham, neighbouring districts and across Greater Manchester. The bus system will be modern and low emission, fully integrated with the wider Greater Manchester transport network. The Metrolink and rail network will have the capacity, reliability, speed, resilience and quality to support growth in the North. There will be a comprehensive network of on and off-road walking and cycling routes that make it easier and safer for people to walk and cycle to key local destinations. Oldham's residents, businesses and visitors who chose to travel by car or van will be able to use electric vehicles with the confidence that they will be able to recharge them via public or private charging points.

**12.7** Oldham Town Centre will be a place that thrives by building quality homes, providing opportunities to learn, develop new skills and gain employment, attracting, retaining and growing businesses, having a diverse culture, leisure and night time economy that attracts more visitors for longer stays, ensuring a safer, healthier, and friendly

environment that is green, clean and sustainable. The borough's other centres will be thriving and the focus for commercial, leisure, social, homes, civic, community, and cultural uses.

- 12.8** The UK's largest urban farm and eco-park will have been created at Northern Roots, it will be a beacon for community growing, sports and leisure activities, local food production, horticulture training, renewable energy and urban biodiversity.
- 12.9** Oldham's Green Infrastructure, including its' nature recovery network, will be protected and enhanced to create a net gain in Oldham's biodiversity, air quality and water quality. Multi-functional Green Infrastructure will be embedded throughout the built environment, in between buildings and spaces, along water corridors and connecting to the wider strategic network including the uplands, major parks, recreational routes and green corridors, local green spaces, accessible open spaces and woodlands.
- 12.10** Oldham will continue to prioritise and value education and skills, supporting key capital and revenue schemes to increase the skills and education achievement rates, alongside supporting all providers to be rated Good or Outstanding.
- 12.11** New development will be brought forward in line with co-design expectations and design codes developed with Oldham's communities. It will respect the key characteristics of Oldham's townscape and landscape types and Oldham's historic environment and rich heritage will be conserved and enhanced.
- 12.12** Oldham will have reached this vision through working in a co-operative manner, alongside partners to achieve long term goals. Oldham will be a place where citizens, and partners, work together to improve the borough.

#### **Vision Question**

1. Do you have any comments to make on the Vision for Oldham? Would you like to see anything added? Do you agree or disagree with the vision? Please explain your answer.

## 13 Plan Objectives

**13.1** The following draft plan objectives have been developed as a result of the initial issues that have been identified through the thematic topic papers and emerging evidence base. These will be refined as further evidence is completed and preparation of the Local Plan progresses, taking into consideration any feedback received.

**13.2** The Local Plan will achieve the vision by:

### ***PO1 Building quality homes to meet the local need and diversify the housing offer by:***

- providing for, and supporting the delivery of, sufficient new homes to meet the borough's local housing need;
- addressing the local housing needs of the borough including providing for the ageing population, families and disabled persons as well as opportunities for self and custom build;
- providing an appropriate level, and range, of housing tenures to meet local housing need, including affordable housing and the private rented sector, taking into account the need of particular parts of the borough;
- identifying a diverse range of sustainable and accessible sites, from small to large, for new homes across the borough;
- ensuring appropriate densities and making the best and most effective use of brownfield land, including through the use of vacant and underutilised land and buildings;
- ensuring Oldham Town Centre plays a vital role delivering around 2,500 new homes as part of it's future regeneration; and
- ensuring high quality, sustainable and well-designed new homes are delivered that contribute to creating a better place for Oldham residents.

### ***PO2 Providing opportunities to learn and gain new skills by:***

- encouraging the improvement of education and skills provision by identifying suitable sites and encouraging high quality suitable developments of this nature; and
- creating employment and skills opportunities for local people as part of new developments.

### ***PO3 Providing opportunities to grow local businesses and create jobs by:***

- providing sites suitable and attractive for existing and new businesses to locate to and expand on;
- encouraging and facilitating the development of the borough's key growth sectors;
- supporting the expansion of digital infrastructure to assist economic growth and social well-being;
- supporting leisure and tourism activity in the right places, motivating local residents and visitors to spend leisure time and money in the borough;
- supporting the expansion of green technologies to achieve the carbon neutrality targets, and at the same time grow the local 'green economy';

- maximising the opportunities of our key Strategic Sites, our Town Centres, our employment allocations and our Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs); and
- ensuring access to employment and leisure opportunities for all, including connectivity to an integrated transport system.

***PO4 Supporting thriving Town Centres by:***

- promoting and supporting the delivery of Oldham Town Centre Vision, and any other appropriate plans or projects that facilitate the development of the borough's centres;
- raising the profile of Oldham Town Centre as a visitor destination, providing more compelling reasons to visit and stay longer;
- promoting the diversification of the borough's centres as places to live;
- incorporating multi functional, useable green infrastructure in our centres to make them attractive locations that people want to spend time in;
- ensuring our centres are places that thrive by having diverse cultural, leisure and night time economies; and
- creating safe, healthy and friendly town centres that are accessible for all, enable active streets and decrease the opportunities for crime.

***PO5 Ensuring Oldham is a greener borough by:***

- designating Local Green Spaces and giving them strong policy protection against development;
- protecting, enhancing and promoting the positive use of the Green Belt;
- protecting, enhancing and improving access to the strategic elements of the Green Infrastructure network including supporting projects such as City of Trees and Northern Roots;
- embedding green infrastructure within and between Oldham's built environment through the use of sustainable drainage, green linkages, green walls, green roofs, soft landscaping, trees;
- re-naturalising and restoring river corridors, canals and waterways where development opportunities arise, to improve the water quality, biodiversity, and to encourage sustainable travel;
- achieving a meaningful net gain in Oldham's biodiversity, including the species identified in Biodiversity Action Plans, priority habitats and other protected species;
- providing new or improved open space, sport and recreation facilities to promote health and well-being and support new homes, particularly in areas of recognised need; and
- protecting and enhancing Oldham's characteristic landscape features and ensure that new development makes a positive contribution to ensure that these features are retained.

***PO6 Embedding sustainability, energy efficiency and low (zero) carbon by:***

- supporting secure, affordable and sustainable energy through a positive approach towards community and commercial energy schemes, the identification of low carbon and renewable energy opportunities and the implementation of the energy hierarchy within new developments;

- reducing the risk of flooding to people and property taking into account climate change;
- managing flood risk through the use of integrated water management and the provision of green infrastructure, including the use of Sustainable Urban Drainage Systems (SUDS), which offer multi-functional benefits such as environmental improvement and biodiversity net gain, urban cooling and recreation to manage climate change stresses; and
- ensuring that water resources are protected and water quality is improved.

***PO7 Improving life-chances and the health and well-being of our residents and local communities by:***

- facilitating new health and well-being facilities and encouraging local and accessible health and well-being services;
- encouraging the creation of community food gardens in new and existing communities;
- supporting the provision of new modern school buildings that enhance learning and contribute to improved outcomes for children and young people;
- promoting community cohesion and encouraging integration, including supporting and protecting new and existing community facilities;
- reducing crime and fear of crime and promoting community safety, through good design of the built environment;
- creating healthier and more vibrant neighbourhoods (including a mix of uses and green spaces) that are walkable and well-connected to existing communities, where infrastructure and services exist or are planned; and
- improving air quality to benefit the health of the borough's residents and visitors.

***PO8 Improving and valuing a better environment, including the borough's historic environment, by:***

- protecting people's amenity and local environmental quality;
- maximising opportunities for the conservation and enhancement of the historic environment and heritage assets ensuring that a positive framework for heritage derives from the overall strategy for Oldham and the wider plan objectives;
- ensuring that development responds positively to the local character, townscape and distinctiveness of the different communities within Oldham, taking into account any conservation area management plans and design codes;
- ensuring that proposals within Oldham Town Centre follows the recommendations set out in the Oldham Town Centre Conservation Area Management Plan with the aim of removing the Conservation Area from the at risk register;
- seeking to identify, protect and enhance non-designated heritage assets that are worth inclusion on a local list; and
- developing "The Oldham Code" to ensure that the places and spaces of Oldham are of a high quality, promote beauty in the built environment, whilst protecting heritage assets and ensure that people can lead healthy and active lifestyles.

***PO9 Ensuring our residents and workforce have fit for purpose, modern connectivity by:***

- reducing the need to travel and promoting accessible and sustainable transport choices such as walking, cycling and use of public transport rather than people relying on the car;
- embedding the Streets for All guidance and promoting the growth of the Bee Network to promote sustainable transport choices; and
- ensuring new development is located in areas with access to local services, with higher density development created around local transport hubs, in order to take advantage of their higher levels of connectivity.

**Plan Objectives Question**

1. Do you have any comments to make on the Plan Objectives? Would you like to see anything added? Do you agree or disagree with them? Please explain your answer.





## 14 Homes

### Housing Supply and Delivery

**14.1** Oldham's current Local Housing Need (the number of new homes needed) is 683 new homes per year, following the publication of the latest affordability ratios in March 2021<sup>(18)</sup>. This is significantly higher than the previous local plan housing requirement of 289 new homes per year, and higher than that of recent annual completions, which in the past five years have averaged 431 a year (net). The rate of delivery of new housing has therefore been insufficient to meet the local housing need for the borough.

**14.2** Oldham has delivered 80% of its housing need over the last three years, as set out in the Government's Housing Delivery Test (HDT) for 2021<sup>(19)</sup>. As a result Oldham must produce a Housing Delivery Action Plan<sup>(20)</sup> and identify an additional 20% of housing land on top of the current five-year supply. The current Action Plan (August 2019), identified a range of actions to address under-delivery, including those around:

- Increasing the delivery of sites within our housing land supply, particularly on brownfield land; and
- Delivery of the council's ambitions to improve and increase the housing offer within Oldham.

**14.3** The five-year housing land supply (as at 1 April 2020) contains land to provide 2,103 homes. This represents a three year supply of deliverable housing against the current local housing need of 683 homes a year. Oldham is unable to demonstrate a five-year supply of housing land. It is also not possible to identify an additional 20% of housing land on top of the current five-year supply, as required by the HDT. As such, the presumption in favour of sustainable development currently applies to all planning applications for housing developments.

**14.4** The draft GMSF 2020 set out a local housing need for Oldham of 695 new homes a year or 11,817 new homes over the plan period (2020 to 2037). This is based on a three stepped requirement of:

- 330 homes a year from 2020 to 2025;
- 695 homes a year from 2025 to 2030; and
- 956 homes a year from 2030 to 2037.

**14.5** The identified future housing land supply (as at 1 April 2020) is 10,955 new homes over the plan period (2020 to 2037). This is less than that required to meet the borough's local housing need. The draft GMSF 2020 proposes several strategic allocations in Oldham where land would be released from the Green Belt, or which include areas of Other Protected Open Land (OPOL). The proposed strategic allocations offer the opportunity to provide a further 2,597 new homes, increasing the total housing land supply to 13,552 and enabling Oldham to meet its housing need. The specific

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18 (as per MHCLGs standard methodology <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>.)

19 The Housing Delivery Test (HDT) has been introduced by the Government as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT measures the net number of additional dwellings built over the past three years against the homes required over the same period. It was last published in February 2021

20 Further information on Oldham's Housing Delivery Test can be viewed here [https://www.oldham.gov.uk/info/200709/documents\\_in\\_the\\_local\\_plan/2135/housing](https://www.oldham.gov.uk/info/200709/documents_in_the_local_plan/2135/housing)

requirements of these proposed allocations are set out in the allocation policies contained in the draft GMSF 2020. The Local Plan may provide further local policy direction on these as required, for example in relation to the amount and type of affordable housing to be provided or open space provision.

- 14.6** The Local Plan therefore, needs to identify opportunities for new homes within the urban area, in order to deliver Oldham's local housing need and provide certainty to developers and the local community as to what sites may come forward, when and how. As such, the Local Plan will need to allocate land that is considered suitable and developable for new homes over the lifetime of the plan. This may include land currently designated as Other Protected Open Land that does not meet the Local Green Space Criteria (for further information please see Section 18 The Natural Environment and Open Land) and previously developed land (brownfield land) within the Green Belt, where it meets the definitions of appropriate development within the Green Belt. Spatial options for the identification of future housing allocations are set out in the Housing Allocation section.
- 14.7** Analysis has found a shortage of large sites within the housing land supply. There is an over-reliance on small sites (delivering less than 10 homes), which despite the amount of these sites, provide a relatively small proportion of the overall supply. For example, in 2019/20 out of the 82 sites with planning permission only one site was for over 50 homes and in the last 10 years there has only been one site exceeding 200+ homes. As such, there is a need to identify sites of different sizes – those of between 10 to 49 homes, 50 to 199 homes and 200 plus homes. A more diverse supply could offer more opportunities for small and medium-sized enterprise (SME) developers, self and custom-build, community build and different housing products.
- 14.8** The Strategic Housing Land Availability Assessment (SHLAA) is a technical document identifying land that might have potential for housing at some stage in the future. It forms a key component of the evidence base underpinning housing policies and land allocations and will help the Local Plan to meet Oldham's local housing needs. The SHLAA (as at 1 April 2020) is available to view on the council's website<sup>(21)</sup>. The SHLAA identifies that 74% of the borough's future housing land supply is on brownfield land, with a further 14% on mixed sites (including brownfield and greenfield land). However, there is a need to increase the development of appropriate brownfield land within the borough and ensure this remains a significant portion of the housing land supply going forward.
- 14.9** The council is committed to supporting the development of brownfield land. Work is underway as part of the council's 'Creating a Better Place' agenda to identify a series of residential-led development opportunities as part of repurposing Oldham Town Centre, to deliver around 2,500 new homes on brownfield land, alongside wider improvements to the town centre. A Mills Strategy has also been commissioned looking at which undesignated mills (mills that are not listed) should be protected and whether they have scope for conversion, taking into account viability and other constraints. The strategy will also identify which undesignated mills are of less importance and where opportunities arise the council may be able to be less protective over these mills, potentially enabling them to be developed for alternative uses, such as new homes.

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21 Strategic Housing Land Availability Assessment (SHLAA) as at 1 April 2020:  
[https://www.oldham.gov.uk/info/200709/documents\\_in\\_the\\_local\\_plan/2134/strategic\\_housing\\_land\\_availability\\_assessment](https://www.oldham.gov.uk/info/200709/documents_in_the_local_plan/2134/strategic_housing_land_availability_assessment)

**14.10** There are issues with viability and deliverability of many sites in Oldham, particularly those within the low value market areas (such as inner Oldham) and where they require the re-use of vacant and under-used buildings or land. This will need to be addressed through the delivery of the Local Plan and the HDT Action Plan, working innovatively with funding providers to make these sites more viable.

## **Housing Need**

**14.11** There are imbalances in terms of the size, mix and type of new homes required across the borough to meet local housing needs. Welfare reform is increasing the amount of homelessness and people are at risk of homelessness in the borough. In addition, there is an outward migration of young people in the borough, as such there is a need to ensure there is an attractive housing offer available in the borough to retain and attract young people. There are also issues of overcrowding in some of Oldham's neighbourhoods and an increased need for larger inter-generational family housing, as well as an increasing ageing population. The following section looks at these housing need groups in more detail.

**14.12** Reflecting these issues, Oldham's Housing Offer, set out in the Housing Strategy, focuses on the council's intention for providing a diverse range of housing that is attractive and meets the needs of different sections of the population at different life stages. A Local Housing Needs Assessment (LHNA) was prepared to support the Housing Strategy and to help shape the Local Plan. The LHNA has helped to identify the needs of the housing need groups considered in this section.

## ***Providing homes for an ageing population***

**14.13** Oldham has an ageing population, which is set to increase by 10,000 in the age range of 75+ by 2035, placing pressure on existing older people accommodation and requiring new provision to be built suitable for older people's needs. This will be a major challenge for the council going forward and the Local Plan will have an important role to play in ensuring that there is a range of appropriate housing provision and that new (and existing) homes are capable of adaptation to meet the changing needs and aspirations of their occupants.

**14.14** In addition, there will be a need for more specialist housing for older people over the next 15 - 20 years. Analysis of demographic change suggests a need for an additional 2,459 units of older persons accommodation up to 2037. This is split 1,604 additional specialist older person's accommodation and 855 additional units of residential care provision.

**14.15** Given the issues above it will be important to:

- ensure that on suitable sites, and in areas of need, allocations and proposals for residential development make provision for accommodation of older people as part of the housing mix. This may take the form of bungalows, level access homes or town centre apartments; and
- ensure that there is a range of appropriate housing provision adaptation and support for the borough's older population, this could be through the 'Lifetime Homes/ Lifetime Neighbourhoods concept'.<sup>(22)</sup>

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22 Lifetime Homes is a concept whereby homes are designed to be flexible and adaptable, to encourage better living environments for everyone, throughout the different stages of their lives. They are designed

### Homes for an Ageing Population Questions

1. In Oldham:
  - Should all new homes be built as a Lifetime Home?; or
  - Should a requirement be set to ensure the delivery of Lifetime Homes on appropriate sites - i.e. 5% of all major sites of a certain size (sites over 50, for example)?; or
  - Should there be another policy threshold / requirement in relation to Lifetime Homes?
2. Should the council identify specific sites suitable for specialist older person's accommodation, including but not limited to residential care provision, to address local housing needs?
3. In what other ways do you think the council could help to deliver homes for, and to meet the needs of, the ageing population?

### ***Providing homes for disabled people***

**14.16** The LHNA considers a range of data to understand the housing needs of people with disabilities and additional needs, to set out the likely scale of residents with such needs and nature of housing stock required to help meet the needs of these groups.

**14.17** The 2018 household survey conducted as part of the LHNA indicated that across the borough a total of 43,200 households (46.5%) contained at least one person with at least one illness/disability. However, only 9.1% of the borough's households live in properties that have been adapted or purpose built for those with an illness or disability. Further analysis indicates that the number of accessible and adapted properties through the borough will need to increase by 1,343 new homes by 2037. Supporting this, demographic modelling suggests that the number of wheelchair accessible homes needs to increase by 550 over the plan period.

**14.18** The draft GMSF 2020 and Greater Manchester Housing Strategy set out that all new homes must be built to the 'accessible and adaptable' standard in line with Part M4(2) of the Building Regulations, unless site specific conditions make this impracticable. It is also recommended that 4% of new homes are built to M4(3) wheelchair user accessible standards.

### ***Providing for families***

**14.19** The 2018 household survey, carried out to inform the LHNA, found that families with dependent children (under 18) and those with adult children (aged 18 and over) account for 21.1% and 11.5% of households respectively across the borough. Analysis of the current housing profile and future market aspirations for family households shows an aspiration for houses with three, four or more bedrooms.

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to incorporate 16 Design Criteria that can be applied to new homes at minimal cost, including those relating to parking, entrances, communal stairs and lifts, internal doorways and hallways, circulation space, entrance level living and bed-space, entrance level WC and drainage, glazing and window heights and location of service controls.

**14.20** With regards to those households in need of affordable housing<sup>(23)</sup>, 14.3% are families. It will therefore be important that as part of delivering affordable housing we ensure that the mix provided helps to address the needs of families.

### ***Providing for a diverse housing offer***

**14.21** Oldham's housing stock is ageing and there are high levels of disrepair, particularly concentrated in areas experiencing deprivation. Oldham has the highest proportion of terraced housing in Greater Manchester, which is contributing to overcrowding in some areas. The borough also has lower than average levels of home ownership and high amounts of private rented housing which are impacting on community cohesion in some areas.

**14.22** The LHNA set out three scenarios for the mix of house type and size that should be provided across the borough. These three scenarios were the demographic baseline<sup>(24)</sup>, households aspirations<sup>(25)</sup> and household expectations<sup>(26)</sup>. These three scenarios are set out in Table 2 below for house type and mix. Please note, these figures are correct at time of writing however they are subject to change should the LHN figure change.

**Table 2 Scenarios for the mix of house types and sizes for Oldham**

House type	Demographic baseline (%)	Aspiration (%)	Expectation (%)
House	61.9	50.4	56.7
Flat	16.2	5.7	6.8
Bungalow	21.1	38.8	28.4
Other	0.7	5.1	8.1
Number of bedrooms	Demographic baseline (%)	Aspiration (%)	Expectation (%)
1	17.2	9.8	8.9
2	31.9	27.4	28.2
3	40.6	42.5	47.6
4	10.3	20.3	15.

23 Affordable Housing is defined in the NPPF as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions - affordable housing for rent; starter homes; discounted market sales; and other affordable routes to home ownership. See glossary for full definition

24 The demographic baseline scenario maps the current profile of the borough's dwelling stock by type and size onto household projections over the plan period.

25 The household aspirations scenario is based on the aspirations of dwelling type and size of households who are intending to move in the next five years

26 The household expectations scenario is based on the dwelling type and size of what households would expect to move to if they are intending to move in the next five years

### Providing for a Diverse Housing Offer Questions

4. Do you think the Local Plan should set a specific mix of house type and size to be delivered across all allocations and development proposals?
5. Should this be based on one of the specific scenarios identified above? If so, which one?
6. Should the Local Plan set out a particular proportion of larger housing (3 and 4+ bed) and level access / bungalow properties required as part of an allocation or development proposals? Reflecting the need for larger family housing and housing for the ageing population.
7. Do you think the Local Plan should not set out a specific mix of house type and size? Instead, should allocations and development proposal consider the local housing need of the surrounding area as appropriate?

### Providing affordable housing

**14.23** Affordable Housing is defined in the NPPF as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions - affordable housing for rent; starter homes; discounted market sales; and other affordable routes to home ownership<sup>(27)</sup>.

**14.24** The LHNA identified a need for 203 affordable homes a year (net) across the borough. This equates to 30% of the borough's local housing need. This was based on the next five years (which at the point of the Housing Strategy publication was up to 2023) and the LHNA recommended that in the absence of any updated information this should be extrapolated forward to the Local Plan period.

**14.25** The LHNA considered national policy, past trends in delivery and the relative affordability of alternative tenure options to recommend an appropriate affordable housing tenure split of:

- 50% social / affordable rented <sup>(28)</sup> and
- 50% intermediate tenure<sup>(29)</sup>.

**14.26** It is considered this approach aligns with the requirements set out in paragraph 64 of NPPF<sup>(30)</sup> for 10% of new homes on larger sites to be made available for affordable home ownership.

**14.27** There is also an imbalance in the spatial distribution of affordable housing across the borough, with affordable housing often being concentrated in lower market areas rather than in higher value areas where there is also a distinct need and issues of rural affordability.

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27 See Glossary for a full definition of affordable housing

28 See Glossary for a full definition of affordable housing

29 See Glossary for a full definition of affordable housing

30 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



**14.28** Recognising the spatial differences highlighted above it is important to ensure that we provide the right type of affordable housing in the right places. Whilst it may be considered that there is a concentration of affordable housing in certain areas, these may not be the right type to meet local housing needs (for example large family sized affordable housing). The LHNA considered the supply and demand variations by area and property size. The assessment found that:

- There were 10,173 households in need (identified through the household survey) with the highest proportions being in West Oldham (16.2%), East Oldham (14.4%) and Chadderton (13.9%) and lowest in Shaw and Crompton (5.4%). 7.3% of households were identified as being in need in both Royton and Saddleworth.
- The proportion of households in affordable housing need varies by tenure and household type, for example:
  - Private rented households are more likely to be in need (22% of households in need);
  - Larger families with dependent children (couples and lone parents) are more likely to be in housing need; and
  - There were 10,530 households with children over the age of 18 living with parent(s), 12.1% of which are in housing need, demonstrating the scale of hidden housing need and overcrowding across the borough.

**14.29** In response, the LHNA suggests the following mix of house type and size for affordable housing:

- Houses (50.9%) and flats (31.7%), bungalows (12.7%) and other types of homes (4.6%).
- One-bedroom (16.7%), two-bedroom (48.7%), three-bedroom (29.6%) and four or more bedrooms (5%).

## **Government's 'First Homes' Proposals**

**14.30** The Government has introduced its latest affordable housing scheme - 'First Homes'<sup>(31)</sup>. Consultation on the proposals ended in May 2020 and the government published a summary of consultation responses in August 2020. First Homes will soon become legislation and changes to national planning policy<sup>(32)</sup> and planning guidance<sup>(33)</sup> will come into effect on 28th June 2021.

**14.31** First Homes are intended to help first time buyers into home ownership in the communities they want to live in. Key workers and armed forces personnel would also be eligible for the scheme. Specific local connection restrictions may therefore be applied to those who are eligible, supported by appropriate evidence.

**14.32** First Homes are a type of 'affordable housing'<sup>(34)</sup> whereby homes will be offered at a discounted market sales value. Specifically, the national standard for First Homes:

- must be discounted by a minimum of 30% against the market value;

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31 <https://www.gov.uk/guidance/first-homes>

32 (NPPF paragraph 62 and Annex 2: Definition of 'Affordable Housing')

33 <https://www.gov.uk/guidance/first-homes>

34 NPPF Annex 2: Definition of 'Affordable Housing'.



- after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London); and
- the home is sold to a person who meets the First Homes eligibility criteria.

**14.33** If they wish to do so council's can set higher discounts than the minimum 30% proposed or a lower sales price cap, to ensure they are affordable for local people. This must be supported by robust evidence, setting out identified need for alternative requirements.

**14.34** In addition, to qualify as a First Home, a section 106 agreement should secure the necessary restrictions on the use and sale of the property, and a legal restriction on the title of the property, to ensure that First Homes, as a discounted market sale home, are retained in perpetuity (although the sales price cap will only apply to the first sale).

**14.35** First Homes will be delivered through two routes within the planning system: as a proportion (25%) of section 106 affordable housing contributions and through an amendment to the policy on entry-level exception sites.

**14.36** For residential developments, once a minimum of 25% of First Homes has been accounted for, the remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy.

### **Spatial Option - Affordable Housing**

8. In relation to an affordable housing requirement:

- a. Should an affordable housing requirement be applied borough-wide? or;
- b. Should there be a different affordable housing requirement for different parts of the borough, depending on their need? If yes, are there any areas in particular where a different approach to the provision of affordable housing is needed?

**14.37** As part of reviewing the Local Plan it is the council's intention to develop an affordable housing standard for Oldham, informed by evidence, and the outcomes of this Issues and Options and future consultations as appropriate. It is anticipated that Oldham's affordable housing standard will set out the council's aspirations for the type and quality of affordable housing offer across the borough to meet local housing need and provide mixed communities within residential developments.

## **Affordable Housing Questions**

### **Level of Affordable Housing**

9. If you agreed with question 6a, do you agree that around 30% of all new homes built on residential developments of over 10 houses should be for affordable housing? If you don't agree, what proportion of all new homes built do you think should be provided for affordable housing?
10. If you agreed with question 6b, in those areas of the borough where you feel an alternative requirement is needed what proportion of all new homes built do you think should be provided for affordable housing?
11. Should there be exceptions to affordable housing requirements. These could be different depending on local circumstances. Factors that may affect an areas affordable housing requirement could include value areas, the affordable housing need(s) in that area, any other conflicting policy requirements such as open space provision?

### **Type of Affordable Housing**

12. In terms of affordable housing tenure do you agree that (once 25% of affordable housing S106 (developer contributions) for First Homes has been met):
  - a. 50% of all new affordable homes built should be for social and/or affordable rented and 50% of all new affordable homes built should be for intermediate tenure?
  - b. If not, how do you think the remaining type of affordable housing tenure provided should be split?
13. In terms of size and type, do you think that:
  - a. Where affordable housing is to be provided the size and type required should be set out? or;
  - b. Should it be left flexible, having regard to local housing needs? or;
  - c. Should this be different for parts of the borough depending on their needs?

## **Vacant Building Credit**

**14.38** Vacant Building Credit (VBC) is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings.

**14.39** NPPF sets out that where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought as set out in their Local Plan. Affordable housing contributions may be required for any increase in floorspace. The financial credit applies in calculating either the number of affordable housing units to be provided onsite or a contribution to offsite provision.

- 14.40** An example is provided in planning guidance which sets out that where a building with a gross floorspace of 8,000 square metre building is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought.
- 14.41** Planning guidance sets out that in considering how VBC should apply to a development, local planning authorities should have regard to the intention of national policy. In doing so, it may be appropriate for authorities to consider:
- whether the building has been made vacant for the sole purposes of re-development;
  - whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development.
- 14.42** VBC does not apply to abandoned buildings. Planning guidance sets out that in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:
- the condition of the property;
  - the period of non-use;
  - whether there is an intervening use; and
  - any evidence regarding the owner's intention.
- 14.43** Deciding whether VBC applies to a proposed development application is a case for the council to judge. As such, local authorities can set out their own policies and requirements for applying VBC, including setting out criteria for application and defining what constitutes a vacant building (including the required vacancy period). It may be appropriate to align VBC policy with employment policy relating to the loss of employment land to ensure consistency.
- 14.44** The council recognise the importance of bringing vacant buildings and previously developed land back into use. However, it is important to ensure that developments on these sites still achieve sustainable development and provide high-quality homes which contribute to meeting local housing needs.
- 14.45** It is also important to ensure that employment uses and heritage assets, such as mills (as identified within the Mill Strategy), are protected. Some vacant buildings may well be brought back into active employment use.
- 14.46** VBC should also support the conversion of mills identified as appropriate within the Mill Strategy, rather than demolition where possible.

### Vacant Building Credit Questions

14. In relation to VBC, should the Local Plan:

- set out specific criteria for applying VBC; or
- not have a specific policy on VBC, instead assess the application of VBC on a case-by-case basis, using planning guidance and national policy?

15. If you answered 'yes' to setting out a specific criteria in the Local Plan should this criterion be that:

- The site must meet the NPPF definition of 'Previously Developed Land' (NPPF, Annex 2 Glossary);
- The building must meet the council's definition of a 'Vacant Building' (see question 16) and must not have been abandoned. The whole building should be vacant for VBC to apply;
- The building must not have been made vacant for the sole purposes of redevelopment. The applicant must demonstrate that vacancy has arisen for other reasons; and
- If the proposal is covered by an extant or recently expired planning permission for the same or substantially the same development or there has been an application submitted but not determined since the VBC was reintroduced and VBC not sought, VBC will not apply.

Are there alternative criterion that should be considered? If yes, please specify.

16. In defining a 'vacant building', should a VBC policy identify an appropriate vacancy period beyond which VBC can be applied? If so, should this be:

- a. a building that has not been in continuous use for any 6-month period during the last three yearsAs based on the CIL definition of a 'vacant building'. This is used by various authorities who have identified VBC policies;
- b. a building that has not been in continuous use for the 12 months prior to the application submission date; or
- c. another period – please specify.

### Providing for the private rented sector

**14.47** As part of the Housing Strategy, a Private Rented Sector Report has been published. In Oldham the private rented sector plays a significant role in providing accommodation, offering an alternative to home ownership for those who choose it or as a step towards home ownership. It is expected to be an increasingly important tenure for families.

**14.48** In Oldham, the private-rented sector is growing, having increased from 8,293 houses in 2010 to 15,185 houses in 2015 with private-rented housing now accounting for 20.3% of private sector housing compared to 11.2% in 2014.

**14.49** The private-rented sector in Oldham remains concentrated in the pre-war housing stock but is also significant in the post-1981 purpose-built flat market. In the absence of significant private sector new build, the growth in private-rental has largely resulted

from tenure change in the existing housing stock and within the pre-war terraced housing sector. It has been concentrated in the West and East Oldham Districts and in the Selective Licensing Areas<sup>(35)</sup>.

**14.50** The report has identified issues such as increased demand, lack of choice for economically vulnerable households, reducing affordability, and poor quality accommodation and standards.

**14.51** As we know where we live has wider impacts on our lives. It is important that rented homes are well managed, safe, decent and affordable. It must be ensured that there is a good quality supply to meet demand of the sector to stabilise rents, encourage good quality management, longer term lets and lower turnover. Partnership working will be encouraged within the sector, as will ensuring the Local Plan provides quality neighbourhoods and mixed communities so as to support this important housing sector to provide quality housing for our residents.

#### **Private Rented Sector Questions**

18. Should a requirement be set for the level of private rented required as part of delivering our local housing need?
19. Should this be applied to all allocations and development proposals or should this only be applied to those allocations and development proposals over a certain size or in locations where there is an identified need for private rented housing?

#### **Houses in Multiple Occupation**

**14.52** Houses in Multiple Occupation (HMOs) provide much-needed housing accommodation for members of our community. HMO is a term that is used to define accommodation that is owned by a private landlord and shared among a number of people. The type of accommodation that could be classed as a HMO includes:

- A number of bedsits in one building
- A hostel
- Halls of residence (private)
- A shared house
- A block of converted flats
- Individual shared self contained cluster flats.

**14.53** However, a concentration of HMOs in one area can change the physical character of that residential area and this can lead to conflict with the existing community.

**14.54** Analysis has shown that the majority of HMOs approved within Oldham over the last ten years (2010-2020) were formerly homes, with over half involving the change of use of small/medium terraced housing. In some cases conversions of these homes into smaller single units as HMOs means the loss of a family home, potentially in areas of need, but may also be leading to overcrowding and poor living conditions.

35 [https://www.oldham.gov.uk/info/200260/private\\_tenants\\_and\\_landlords/1450/selective\\_licensing\\_of\\_private\\_landlords/2](https://www.oldham.gov.uk/info/200260/private_tenants_and_landlords/1450/selective_licensing_of_private_landlords/2)

- 14.55** However, these conversions to HMOs have led to an increase in the number of single-occupation accommodation available within the borough, which the LHNA also found to be in limited supply, including within the private-rented sector.
- 14.56** Over the past ten years the majority of approvals for HMOs were located on sites within urban areas and town centres. West Oldham has significantly more recorded HMOs than any other district, with around a third of the borough's total being located in this district. Oldham Town Centre also has a significant proportion of HMOs, and significantly more than any other centre in the borough. This is to be expected somewhat given the services, high public transport accessibility and facilities located within the town centre. However, there remains a growing shortage of private-rented accommodation within Oldham Town Centre and a lack of affordable housing.
- 14.57** The planning system can assist in achieving a mix of households within neighbourhoods, meeting different housing needs. In some areas within the borough it may be appropriate to prevent the development of excessive concentrations of HMOs and thus encouraging a more even distribution across the borough. It is also necessary to ensure that dwelling and living standards are maintained and these homes are well managed.
- 14.58** Under Part 2 of the Housing Act 2004, owners and landlords must now get a licence to manage certain larger, higher-risk HMOs. Oldham Council are currently reviewing the standards for HMOs<sup>(36)</sup> and further information on management of HMOs is available on the council's website<sup>(37)</sup>.
- 14.59** Local authorities have the right to introduce Article 4 directions to remove permitted development rights for HMOs reintroducing the requirement for planning permission. This means that issues such as housing standards, local environment and amenity and over-concentration can be considered as part of the application process. These restrictions can be borough-wide, or relate to specific areas of the borough where there are identified issues or other impacting factors. Further research will be carried out to understand whether there are issues associated with concentrations of HMOs within the borough.
- 14.60** The council will promote certain areas in the borough, such as those within a close proximity to transport nodes (including train stations, tram stops and / or bus stations) as locations best suited for HMOs.

#### **Spatial Option - Homes in Multiple Occupation (HMO)**

20. If there is found to be a concentration of HMOs within a particular area, would you agree with the introduction of an Article 4 direction to remove permitted development rights for HMOs:
- in specific areas, as necessary? or;
  - borough-wide?

<sup>36</sup> Previous HMO standards were published by the council in 2010.

<sup>37</sup> Houses in Multiple

Occupation: [https://www.oldham.gov.uk/info/201198/help\\_for\\_landlords/258/houses\\_in\\_multiple\\_occupation](https://www.oldham.gov.uk/info/201198/help_for_landlords/258/houses_in_multiple_occupation)

### Question - Homes in Multiple Occupation (HMO)

21. If an Article 4 direction was introduced, should specific criteria for the development of new HMOs be set out in policy to ensure HMOs meet appropriate standards? And if so, what should this criteria include?

### Providing for self-build and custom housebuilding

- 14.61** The council holds a register of individuals and groups who wish to self-build or custom build in the local area. There were 334 entries on the register as at 30<sup>th</sup> October 2020.
- 14.62** As set out in the Self and Custom Housebuilding Act 2015, at the end of each base period<sup>(38)</sup>, authorities have 3 years in which to grant permission for an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are register entries for that base period. Evidence shows that there is a lack of suitable serviced plots available within Oldham to meet the demand identified on the register.
- 14.63** Oldham was unable to identify sufficient plots for the 102 entries on the register, as of the first base period<sup>(39)</sup>. Analysis demonstrates that at the end of the three years following the first base period (30<sup>th</sup> October 2019) there were only 70 suitable plots for self-build or custom build with planning permission. A shortage of 32 suitable plots for the first base period. Oldham has also been unable to identify sufficient plots for the 46 entries on the register for the second base period<sup>(40)</sup>, having granted permission for 25 suitable plots within the three years following the second base period. A shortage of 21 suitable plots for the second base period.
- 14.64** Analysis of the Self-build and Custom Build Register as at 30 October 2020 shows that out of the locations specifically mentioned by the entrant, Saddleworth is the most desired location for a plot, with 29% of entries citing Saddleworth as a desired location. Royton, Shaw and Chadderton are the next most cited locations for plots with 12%, 9% and 7% of entries respectively.
- 14.65** Uppermill is the most cited location within Saddleworth, although all of the Saddleworth villages have been cited. Other areas with a notable number of entries stating it as a desired location are Failsworth, Coppice, Lees, Hathershaw and Werneth.
- 14.66** In terms of house type, the majority of register entries (61%) specify detached as the desired house type and the majority of entries (34%) specify a desire for four-bedroomed properties, closely followed by three-bedroomed properties (32%).

38 The first base period begins on the day on which the register (which meets the requirement of the 2015 Act) is established and ends on 30 October 2016. Each subsequent base period is the period of 12 months beginning immediately after the end of the previous base period. Subsequent base periods will therefore run from 31 October to 30 October each year.

39 The first base period is identified as 1st April 2016 to 30th October 2016.

40 The second base period is identified as 31st October 2016 to 30th October 2017.



- 14.67** Analysis of preferences from the register correlate with findings of the LHNA, and those areas where there is a shortage of three and four bedroomed homes and detached properties. This highlights that the motivations for people registering for self-build and custom build may be because their requirements cannot be met by the existing housing stock.
- 14.68** There are issues that can arise with the delivery of self-build and custom build if they are provided as part of a wider development site, including conflicting phasing, access and construction issues, and economic vulnerability meaning they may never be delivered. To address this a policy may be needed to consider a time limit for delivery of self-build and custom build plots, ensuring that if they have been appropriately marketed and have not sold, they may either remain on the market or be built out by the developer.
- 14.69** The council is committed to ensuring self-build and custom build demand is met in the future. Self-build and custom build is promoted within Oldham's recently published Housing Strategy and Housing Delivery Action Plan (Part 2). Within both documents there are specific actions related to ensuring small site development is increased and supported.

#### **Providing for Self-build and Custom Housebuilding Questions**

22. Should specific allocations be identified for self-build and custom build having regard to the demand for the provision of serviced plots in certain locations and for certain house types?
23. Should self-build and custom build serviced plots be required on all residential developments over a certain threshold?
  - a. If so, what should this threshold be? E.g. 50 homes and above or 100 homes and above or 200 homes and above.
24. Or, should self-build and custom build serviced plots be required on certain types of sites, e.g. council-owned land, strategic development sites etc or sites with the ability to have separate accesses for self and custom build elements?
25. Or, should the policy set out that self-build and custom build serviced plots be provided on sites only in certain areas of demand (and only for developments over a certain size)?
26. If self-build and custom build plots are made available, either through an allocation or as part of wider development sites, should there be a time limit for sale/ delivery of these plots to ensure appropriate delivery?

#### **Providing for Community Build**

- 14.70** The Localism Act, introduced by the Government in 2011, allows for community organisations to bring forward a 'community right to build order' which is a type of neighbourhood development order.
- 14.71** This allows certain community organisations to bring forward smaller-scale development on a specific site, without the need for planning permission. This gives communities the freedom to develop, for example, small-scale housing and other facilities they may want, such as village halls, playgrounds etc. This can help meet local housing needs,

such as affordable housing, housing for older people and disabled people, and particular mix and types as is needed for a particular area. Developments can be in the form of new build or conversion of existing buildings.

**14.72** Community right to build offers communities the opportunity to address needs in their areas, get involved in the decision making process and take a role in the delivery and outcomes of the project.

**14.73** Community right to build orders are subject to a limited number of exclusions, such as proposals needing to fall below certain thresholds so that an Environmental Impact Assessment is not required. Proposals are subject to testing by an independent person and a community referendum.

**14.74** The council will continue to work closely with neighbourhood groups and is committed to supporting community right to build, as appropriate.

#### **Community Right to Build Question**

27. Are there any sites you consider to be suitable for Community Right to Build, which the Local Plan should identify?

#### **Providing for Children's Homes**

**14.75** The NPPF specifies that the housing needs of all sections of the community need to be addressed through the Local Plan, including the accommodation requirements of children in need of, or in the care of the Local Authority.

**14.76** Evidence shows that residential care homes for looked-after children are increasingly coming forward in areas of high deprivation in the borough. It is important to ensure that good quality homes for looked-after children within the care of Oldham Council are provided in appropriate premises and locations within the borough that meet their needs, providing a safe and secure environment whilst safeguarding local character and amenity.

#### **Providing for Children's Homes Questions**

28. Should the new Local Plan have a specific policy on the use of properties as children's homes?

29. If yes, what matters should be taken into consideration in developing the policy and when determining an application (such as need and location)?

#### **Providing for Gypsies, Travellers and Travelling Showpeople**

**14.77** The NPPF specifies that the housing needs of all sections of the community need to be addressed through the Local Plan, including the accommodation requirements of gypsies, travellers and travelling showpeople.

**14.78** The 2018 Greater Manchester Gypsy and Traveller and Travelling Showperson Accommodation Assessment identified no evidenced need for gypsy and traveller pitches in Oldham. For travelling show people the assessment identified a need for 204 additional plots up to 2035/36 across Greater Manchester and recommended that the Greater Manchester Combined Authority (GMCA) considers the development of 59 transit pitches to address the short-term accommodation needs of households travelling through the Greater Manchester area.

**14.79** Further research will be undertaken as appropriate to understand the needs for gypsies, travellers and travelling showpeople and inform preparation of the Local Plan.

### Densities and making the most effective use of land

**14.80** As there is an identified housing shortage, housing should be built at appropriate densities, having regard to location and sustainability, to ensure the most effective use of land.

**14.81** Looking ahead, an average of 74% of all new homes identified as part of the borough's potential housing land supply (as at 1 April 2020) are on previously developed land. Options regarding the re-use of vacant and under-utilised land, such as mills and existing employment land that may be appropriate for alternative development, including housing, are considered elsewhere within this document.

**14.82** Draft GMSF 2020 includes Policy GM H4 Density of New Housing which sets out density requirements for new housing across the Greater Manchester, differentiating between the City Centre, designated town centres (including Oldham Town Centre) and public transport nodes. The density assumptions proposed in draft GMSF 2020 are set out in Table Three below.

**Table 3 Draft GMSF 2020: Density Assumptions**

Draft GMSF 2020 Density Assumptions for New Housing			
Location (highest density applies when site falls within more than one location)	Minimum net residential density (houses per hectare)		
	Within the location	Within 400 metres	Within 800 metres
<b>Designated centres:</b>			
City Centre	200	120	70
Designated town centres	120	70	50
Other designated centres	70	50	35
<b>Public transport stops:</b>			

### Draft GMSF 2020 Density Assumptions for New Housing

Location (highest density applies when site falls within more than one location)	Minimum net residential density (houses per hectare)		
	Within the location	Within 400 metres	Within 800 metres
Main rail stations and Metrolink stops in the City Centre	N/A	200	120
Other rail stations and Metrolink stops in large designated centres	N/A	120	70
Other rail stations with a frequent service and all other Metrolink stops	N/A	70	50
Leigh Guided Busway stops ( <i>none in Oldham</i> )	N/A	50	35
Areas within GMAL <sup>(41)</sup> 6 and above or its equivalent	50	35	35
<b>All other locations:</b> minimum net residential density of 35 houses per hectare			

#### Density Questions

30. Do you think there are areas within the borough where these minimum density assumptions may not be appropriate? If yes, where and what alternative density assumptions would you suggest?
31. In what circumstances do you feel that a density lower than the minimum assumptions set out above would be acceptable? These circumstances may include local character and setting, for example.

<sup>41</sup> Greater Manchester Accessibility Levels (GMAL) are a detailed and accurate measure of the accessibility of a point to both the conventional public transport network (i.e. bus, metrolink and rail) and Greater Manchester's Local Link (flexible transport service), taking into account walk access time and service availability. Further detail is available through Transport for Greater Manchester (TfGM).

## Housing Allocations and Policies

**14.83** There were a number of housing allocations identified in the 2006 Unitary Development Plan (UDP), along with four mixed use allocations, which were saved as part of the Local Plan until such a time as they were reviewed. A number of these allocations have of course been built. The remaining allocations are identified in Table Four below:

**Table 4 Remaining Saved UDP Housing and Mixed Use Allocations**

Allocation Ref	Ward	Site Name	Land type	Area (ha)	Capacity	Density
<b>Saved UDP Phase 1 Housing Allocations</b>						
M3	Failsworth West	Land at Oldham Road/ Hardman Street, Failsworth	BF	1.56	10	6
H1.1.23	Hollinwood	Pretoria Road, Oldham	BF	0.46	14	30
H1.1.24	Royton South	Sandy Mill - Land Fronting Rochdale Road, Royton. Site of C&A motors and stadium works.	BF	0.55	22	40
H1.1.29	Royton South	Blackshaw Lane, Royton	GF	0.6	14	23
H1.1.25	St James	Jowett Street, Oldham	BF	0.66	26	39
H1.1.15	Saddleworth North	Bailey Mill, Delph	CON	0.86	50	58
M4	Waterhead	Huddersfield Road/Dunkerley Street, Oldham	BF	2.61	50	19
H1.1.21	Waterhead	Land at Springhey Mill, Huddersfield Road	BF	0.33	30	91
H1.1.27	Werneth	Land at North Werneth Zone 6 (Hartford Mill, Edward St)	BF	2.7	158	59
<b>Saved UDP Phase 2 Housing Allocations</b>						
H1.2.3	Failsworth East	Ashton Rd, Woodhouses (part of the site has planning permission)	GF	1.71	51	30
H1.2.4	Failsworth East	Medlock Road, Woodhouses	GF	0.66	20	30
H1.2.16	Hollinwood	Land at Lower Lime Road	GF	2.59	78	30
H1.2.17	Medlock Vale	Danisher Lane	GF	0.46	18	40
H1.2.6	Shaw	Lilac View Close, Crompton	GF	0.59	18	31

Allocation Ref	Ward	Site Name	Land type	Area (ha)	Capacity	Density
<b>Saved UDP Phase 1 Housing Allocations</b>						
H1.2.11	Saddleworth North	Land at Ripponden Rd	GF	0.63	19	30
H1.2.10	Saddleworth West & Lees	Land at Knowls Lane (site has been granted planning permission subject to Judicial Review)	GF	5.8	232	40

**14.84** H1.2.17 Danisher Lane falls within the strategic allocation at Land south of Coal Pit Lane (Ashton Road) proposed in the Draft GMSF 2020.

**14.85** Draft housing allocations will be set out in the Draft Local Plan following completion of further evidence.

**14.86** Views on any of the saved UDP housing allocations identified above would be welcomed.

#### **Housing and Mixed Use Allocations Question**

32. Do you have any views on any of the saved UDP housing and mixed use allocations identified above? (Plans of each site can be found in Appendix 4 and Appendix 5. In addition please submit the details of any other sites you are aware of in the borough that may be suitable for housing.



## 15 Economy and Employment

**15.1** Oldham's economy has failed to benefit fully from growth at a Greater Manchester level in many ways, including business start-ups, Gross Domestic Produce, wages and skills levels. There is therefore a need to plan for future employment needs so that we become a key economic contributor within the sub-region and rebalance the economy. The fact that Oldham has a significantly higher percentage of its working age population with no qualifications, is a major issue for Oldham if it is to compete with other Local Authorities and attract new businesses. Median household income in Oldham (£25,000) is lower than Greater Manchester (£27,198) and Great Britain (£29,869)<sup>(42)</sup>. Oldham has a higher percentage of working age population that have no qualifications than Greater Manchester and nationally and Oldham's employment rate is the third lowest in Greater Manchester. Going forward there is the need to ensure that we seek higher value jobs and job creation through the boroughs key growth sectors and there will be a need to reflect the emerging Work and Skills Strategy.

**15.2** The impact of the COVID-19 pandemic on jobs, livelihoods and the economy have already been widespread and the longer the virus affects the economy, the greater the risks of long-term scarring and permanently lower economic activity, with business failures, persistently higher unemployment and lower earnings. It will be important to focus on positive Local Plan policies that can help our residents and businesses recover from this challenging period of economic uncertainty.

**15.3** In addition to the challenges and job losses that the pandemic has contributed to in the borough (on the retail sector in particular), in the past twelve months Oldham has also lost some significant employers (such as the Very Group in Shaw which was a loss of around 2,000 jobs), further adding to unemployment levels. This has highlighted the need for Oldham to provide land and sites, of varying sizes, attractive to existing businesses that may be looking to relocate and any businesses looking to invest in the borough. If we do not provide suitable land and sites for these businesses, there is the potential that Oldham will fail to a) attract such investment and lose out to neighbouring boroughs across Greater Manchester and beyond, and b) realise its ambition to be a key contributor to Greater Manchester's economy.

**15.4** In 2019 Amion reviewed the key growth sectors for Oldham and assessed the borough's designated Business and Employment Areas and Saddleworth Employment Areas (BEAs and SEAs) to see how they could accommodate the identified sectors<sup>(43)</sup>. Individual maps of the BEAs and SEAs can be found in Appendix 6. The sectors identified as being key for Oldham were:

- Construction;
- Health and Social Care;
- Digital Industries (including creative industries);
- Business and Professional Services;
- Manufacturing sub sectors; and
- Logistics

**15.5** The work concluded that some of our BEAs and SEAs may not be attractive to any of our key growth sectors and some may be attractive to one or more of the sectors.

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42 (Oldham LEA, 2019)

43 Strategic Investment Framework Refresh and Sector Requirements Review, Amion 2019

**15.6** The 'top scoring' BEAs/SEAs for each key growth sector are set out in Table 5 below:

**Table 5 Top scoring employment areas by sector**

	Priority Site 1	Priority Site 2	Priority Site 3
Construction	Higginshaw	Primrose Bank	Hathershaw
Health and Social Care	Busk	Hollinwood	Greengate/Broadgate
Digital Industries	Hollinwood	Greengate/Broadgate	Foxdenton
Businesses and Professional Services	Hollinwood	Greengate/Broadgate	Foxdenton
Manufacturing	Higginshaw	Shaw Road	Hathershaw
Logistics	Hollinwood	Shaw	Greengate/Broadgate

**15.7** As highlighted in the table above a number of sites have been identified as one of the top scoring locations for a range of sectors. In particular, this includes:

- Hollinwood Business District – an established strategic employment area benefiting from good access to the motorway network and currently accommodating a range of industrial and office uses, which is being actively promoted for further development; and
- Greengate/Broadgate – an established mixed employment area with direct access to the M60. The area is extensively developed, with limited availability of vacant land at the western edge of the site.

**15.8** In addition to these sites, Foxdenton has been identified as a potentially suitable and attractive location for digital, business and professional service activities, which would be sympathetic to the residential-led development of the wider site. Sites at Higginshaw and Hathershaw have been identified as suitable for construction and manufacturing activities, these sites are long established and fulfil an important local function, providing affordable and flexible accommodation with high levels of occupancy. Despite these existing opportunities, the assessment identified that overall there is a shortfall in the availability of suitable developments sites for our key growth sectors.

**15.9** In July 2019 the council committed to becoming carbon neutral as an organisation by 2025, and to becoming the UK's first "Green New Deal Council", setting a target of 2030 for carbon neutrality for the borough as a whole. An "Oldham Green New Deal Strategy" will include a wide-ranging programme of delivery focusing on tackling climate change and other environmental challenges whilst building the green business sector across Oldham and reducing energy bills for the public and private sectors and households. Themes will include deploying technology to create a local energy market, new business models for renewable energy and encouraging green infrastructure on new developments and regeneration schemes, social prescribing with green schemes to improve health and wellbeing for residents whilst cutting public sector costs, and transforming the reputation of the borough and boosting tourism. It will be important to ensure that the promotion of our key growth sectors (as set out above) includes

links with the council's ambitions regarding the building of the green business sector. This will include supporting companies who are looking for opportunities to develop sustainable, environmentally-friendly materials; decarbonize energy; tap digital innovation for doing more with less; and extend the life cycle of goods within a "zero waste to landfill" framework. All of these companies would fall under the 'manufacturing' and 'digital industries' sector which have been found to be key growth sectors going forward in Oldham.

- 15.10** In addition to the need to identify new opportunities to support economic growth across the borough, there is also significant pressure on Oldham's existing employment sites (including the BEAs and SEAs) to be released for other uses, including for the development of new housing. On the other hand there is 186,471 sqm of vacant or underused mill floorspace in the borough. This demonstrates that there needs to be a reconfiguring of Oldham's existing employment stock to determine that the land and sites are being put to the most appropriate use, be it supporting our key growth sectors, performing a more local form of employment or releasing employment land for other uses.
- 15.11** In addition to this, 'Places for Everyone', is proposing a significant amount of employment floorspace within Oldham as part of the cross-boundary (with Rochdale) strategic allocation at Stakehill - a strategic location that will appeal to Oldham's key growth sectors, providing an attractive location where business and enterprise can thrive and where people will want to live and work. 'Places for Everyone' also identifies a broad location at High Crompton for employment and housing. The broad location will remain in the Green Belt and would only come forward following a review of the joint DPD or the Local Plan and where the evidence is available to justify its allocation and release from the Green Belt. In addition to these locations, Places for Everyone also proposes around 22,000sqm of employment floorspace as part of the Broadbent Moss allocation.
- 15.12** If Oldham is to achieve its vision of an 'Inclusive Economy' and 'Thriving Communities' it is essential that we have a portfolio of diverse, suitable and attractive employment sites for existing businesses to grow and relocate to and to attract new businesses to invest in the borough. Similarly, it is of equal importance that sites that are no longer deemed as appropriate for employment uses be re-looked at to see how they may be redeveloped for alternative uses, including their potential to contribute to Oldham's Local Housing Need.
- 15.13** Delivering our key growth sectors will be crucial in meeting Oldham's economic ambitions. The Stakehill cross-boundary allocation proposed in Places for Everyone, along with the floorspace to be provided as part of the Broadbent Moss allocation, will contribute towards a portfolio of sites that will help to meet our economic ambitions for the borough, in particular meeting the locational requirements of businesses in our key growth sectors. Oldham's other employment areas will help support our key growth sectors, with the 2019 Amion work on sectors and Oldham's employment areas helping shape the uses that may be permitted within these areas and the level of protection that is afforded them. Their boundaries will also be reviewed as part of this Local Plan Review.

### **Approach to Employment Areas Questions**

1. There are currently 23 BEAs and SEAs designated across the borough (see plan below and individual plans in Appendix 6). Do you have any comments on these sites? Are they fit for purpose? Or would you suggest any amendments to the boundaries or deletions?

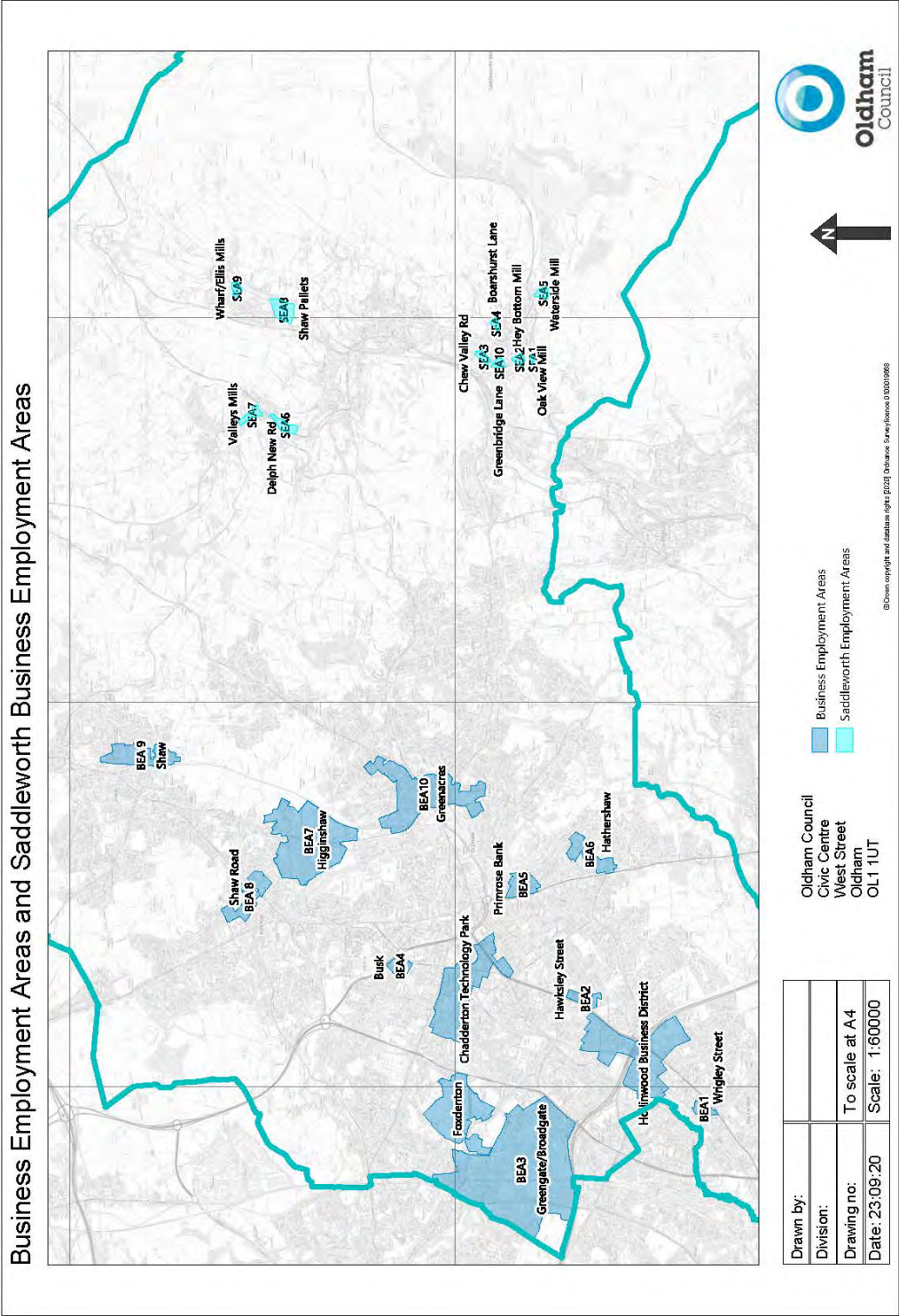
### **Delivering Key Growth Sectors in our Employment Areas Questions**

2. Should we have a tiered approach to the protection of our BEAs and SEAs. So, sites that are considered 'best' in relation to our key growth sectors have no exceptions ensuring they can only be used for their designated uses. The other BEAs and SEAs would be subject to something similar to the existing policy where certain exceptions could be applied if certain tests were met.
3. If a tiered approach is implemented, should we then restrict the uses permitted within some of the BEAs and SEAs considered 'best' in relation to our key growth sectors? For example, restricting some BEAs and SEAs to certain key growth sectors as identified in the 2019 Amion work as set out above, or restricting some to green technology uses to support the Green New Deal?
4. Is there an alternative approach in relation to how we protect our 'best' employment areas? If so, please submit an alternative method.

### **Approach to general BEAs and SEAs Questions**

5. Should we protect all the existing BEAs and SEAs under the same policy, allowing a number of exceptions where the sites can be used for alternative uses? This is the case in the current Local Plan and the exceptions are that the site is no longer appropriate or viable to continue in its existing use.
6. Should the SEAs have a different policy to the BEAs (in relation to the uses permitted within them and / or the level of protection they have) to reflect their location within the Saddleworth villages and /or their contribution to the local economy, such as uses related to tourism and leisure?
7. Should we have no protection over our employment areas and let the market decide what uses should go on the sites?

Business and Employment Areas and Saddleworth Employment Areas (individual plans can be found in Appendix 6)





## Employment Allocations

**15.14** Places for Everyone will set out the employment land requirement for Oldham over the period of the plan. Oldham's current employment allocations are saved under UDP policies B1.1 and B.2. As part of the evidence base for the Local Plan, an Economic Land Assessment will be carried out to determine how fit for purpose our existing employment sites are, how much of the allocations still remain and help inform if they are taken forward as allocations as part of this Local Plan or not. The current saved UDP allocations are set out in Table 6 below.

**Table 6 Saved UDP Business and Industry and Business and Office Allocations**

Reference	Site Name	Area (hectares)
B1.1.3	Mersey Road North / Albert Street, Hollinwood	0.93
B1.1.5	Land at Sellers Way, Hollinwood	0.99
B1.1.6	White Moss View, Greengate, Chadderton	1.23
B1.1.7	Land at Greenside Way, Chadderton	0.62
B1.1.8	Land at Greengate, Chadderton	1.22
B1.1.9	Land at Moston Road, Chadderton	1.58
B1.1.10	Land at Junction Mill / Foxdenton Lane, Chadderton	6.39
B1.1.11	Causeway North, Oldham Broadway Business Park, Chadderton	7.26
B1.1.12	Land at Oldham Broadway, Chadderton	0.77
B1.1.13	Oldham Broadway Business Park, Chadderton	0.63
B1.1.14	Gateway Crescent, Oldham Broadway Business Park, Chadderton	1.44
B1.1.15	Gateway Crescent, Oldham Broadway Business Park, Chadderton	1.62
B1.1.16	Oldham Broadway Business Park, Chadderton, Oldham	0.95
B1.1.18	Ram Mill, Gordon Street, Chadderton	2.02
B1.1.19	Land at New Coin Street, Royton	0.40
B1.1.20	Land at High Barn St. / Edge Lane St., Royton	0.64
B1.1.21	British Gas, Higginshaw Lane, Royton	10.60



Reference	Site Name	Area (hectares)
B1.1.22	Land at Meek Street, Royton	4.05
B1.1.24	Royton Moss, Moss Lane, Royton	7.08
B1.1.25	Land at Clarence Street, Royton	0.93
B1.1.26	Land at Beal Lane, Shaw	1.07
B1.1.28	Land at Huddersfield Road, Diggle	2.60
B1.2.1	Southlink Business Park	2.39
B1.2.2	Sefton Street, Hollinwood	2.40
B1.2.3	Union Street West / Oldham Way, Oldham	0.99
B1.2.4	Oldham Way / Mumps, Oldham	1.70
B1.2.5	Primrose Street / Crossbank Street, Oldham	3.78
B1.2.6	Albert Street, Hollinwood 6.77	6.77
B1.2.7	Stable Street, Hollinwood 2.09	2.09

**15.15** B1.1.24 Royton Moss, Moss Lane, Royton falls within Policy GM Allocation 14 Broadbent Moss of Draft GMSF 2020.

**15.16** Draft employment allocations will be set out in the Draft Local Plan following completion of further evidence.

**15.17** In the meantime, views are sought on the spatial options, as set out below, to inform the scope for the identification of employment allocations as part of the next stage.

### **Spatial Option - Employment Allocations**

8. Options in relation to allocating employment land are:

- a. To focus more on the sustainable connectivity to our existing employment sites and neighbouring districts key employment sites; or
- b. A combination of providing some new employment land and improving sustainable connectivity to existing and neighbouring districts key employment sites.

**15.18** Views on any of the saved UDP employment allocations identified above would also be welcomed.

### Employment Allocations Question

9. Do you have any views on any of the saved UDP employment allocations identified above? (Plans of each site can be found in Appendix 7). In addition please submit the details of any other sites you are aware in the borough that may be suitable for employment.

### Mills

- 15.19** Oldham has a rich industrial heritage with over 100 textile mills remaining. Many of the mills are in active use, offering low cost premises to certain employment uses, residential use, retail or for social uses such as sports clubs. However, some mills have been derelict for many years or are underused with upper storeys not in use, which puts them at risk of falling into poor condition and may make conversion more difficult in the future. They are also often close to existing residential properties and may not always be in the best location for their current use.
- 15.20** The mills are an important resource; however, they need to be managed to ensure a sustainable future in making the best use of the mills going forward. NPPF encourages the re-use of brownfield land and underused buildings and so we need to be clear what role our mills can play in relation to our economy, meeting our housing need and the landscape of Oldham.
- 15.21** The emerging Oldham Mills Strategy looks at the contribution the remaining mills make now and their potential going forward. For further details please see the Built Environment section.

### Culture

- 15.22** Oldham Town Centre and Saddleworth are two important hubs for culture in Greater Manchester. Oldham Town Centre is noted for Gallery Oldham, The Coliseum and the Odeon Cinema, whilst Saddleworth is known for Uppermill village, Saddleworth Museum and Gallery, Millgate Arts Centre and the various events that are held in the area, throughout the year such as the Band Contest. A number of cultural assets are operated by the council, including:
- Gallery Oldham;
  - Oldham Arts Development Service;
  - Oldham Local Studies and Archives;
  - Oldham Theatre Workshop;
  - Oldham Council Libraries; and
  - Oldham Music Service.
- 15.23** It is important that the Local Plan protects and enhances the role that these cultural institutions and services play in the area. They are key to improved economic and social prospects for the area. They play a crucial role in expanding the tourism offer within the borough.
- 15.24** The Greater Manchester Culture Strategy highlights the importance of a diverse mix of creative and independent businesses to the vibrancy, prosperity and distinctiveness of our places. Oldham is proud of its rich cultural heritage and thriving cultural sector,

from grass-roots community and heritage groups to internationally significant cultural organisations and cutting edge digital festivals. Oldham has a diverse and distinctive offer which preserve and tell our stories, to ensure that Oldham remains exciting, forward thinking and relevant.

**15.25** The council is currently working on a Cultural Strategy for the borough. Once completed the Local Plan will consider the findings and aim to support the Strategy through the vision, plan objectives and policies.

**15.26** The continued enhancement of cultural opportunities is central to place-making across the borough. The importance of culture will need to be reflected in the way in which our towns and neighbourhoods develop, with individual developments contributing towards this. Many of Oldham's cultural assets are located in mixed use areas with sensitive uses in close proximity, including existing and proposed residential development.

### Culture Questions

10. Should Oldham introduce a policy that protects and promotes cultural venues?

### Tourism

**15.27** Oldham has two distinct areas that make up our main tourist destinations, Oldham Town Centre and Saddleworth. Oldham Town Centre has attractions such as Gallery Oldham, The Coliseum and the growing evening economy around Odeon Cinema and many independent restaurants. Saddleworth's attractions include Saddleworth Museum and Gallery, Uppermill village, the Huddersfield Narrow Canal and the open countryside leading to attractions such as Dove Stone reservoir.

**15.28** There is a need to build on the number of visitors to Oldham Town Centre and to ensure that visitors have reasons to stay longer. In relation to Saddleworth, there is the need to manage number of visitors to the area in a sustainable manner, ensuring the villages do not become overburdened by tourists to a level they cannot cope with. In relation to this many of the visitors Saddleworth receives are often attracted to the countryside and the walks available in the area, these visitors, though they may put pressure on the surrounding road network in the area, may not necessarily spend money in the villages and therefore contribute little in terms of benefits to the local economy. In addition, there is also the need here to increase the length of time visitors stay in the borough for, encouraging short and long breaks as opposed to day trips.

**15.29** In 2018, Oldham's visitor economy had direct expenditure of £192.26 million and an economic impact of £285.61 million. In addition, it directly employed 2,404 people in full time job's and supported the employment of 3,378 full time jobs <sup>(44)</sup>.

**15.30** The visitor economy plays a vital role in the overall wellbeing of communities and the quality of life of our residents and ambitious projects such as Northern Roots aim to attract more visitors regionally and nationally to the borough and will boost the visitor economy going forward, whilst at the same time potentially easing some pressure on the more popular tourist destinations in the borough.

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44 STEAM Data, 2018

**15.31** However, it is recognised that a limitation to Oldham's visitor economy is the limited number of hotels the borough has. There are only seven hotels within a two and a half mile radius of the town centre, providing a total of 438 bedrooms. In addition, Oldham does not currently benefit from a town centre hotel, nor one of a 4 star provision. The market is characterised predominantly by the budget sector, providing 68% of the total bedroom supply<sup>(45)</sup>. To grow the visitor economy and encourage visitors to stay longer, it will be important to expand and diversify the hotel offer within the borough.

#### **Tourism Questions**

11. How do you think that Oldham can build on its tourism base?
12. Should Oldham allocate sites for tourism uses such as land for hotels to help boost the visitor economy?
13. How can tourism be promoted in a sustainable manner?

#### **Farm Diversification**

**15.32** The council currently has a saved planning policy on farm diversification, this can be found in Appendix 8. It is saved from the 2006 Unitary Development Plan (UDP) and is called Policy OE1.11 'Farm Diversification'. The policy outlines circumstances where the council would permit a proposal for non-agricultural development on farm holdings. The aim of the policy was to encourage diversification of the rural economy, particularly in the urban fringe, where it could enhance tourism, recreational or educational opportunities.

#### **Farm Diversification Question**

14. Do you think Oldham should continue to have a policy that supports the diversification of the rural economy?

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45 (Oldham Council, 2019)

## 16 Our Centres

- 16.1** The traditional role of town centres (such as the retail and the high street sectors) is expected to continue to decline, while e-commerce will rise. In addition, Oldham Town Centre has very little high-quality office space. There is also a lack of green space within Oldham Town Centre and a low dwell time, if the town centre were to have attractive areas for residents and visitors to enjoy, people may stay longer and spend more money in the centre.
- 16.2** In addition to the above, COVID-19 has already had and continues to have, a huge impact on high streets, with a number of national multiple retailers restructuring or entering administration, including Clarks, Debenhams, and Brighthouse. British Independent Retailers Association has reported that 20% of retailers do not intend to reopen after the relaxation of lockdown restrictions. High street vacancies look set to increase dramatically. In addition to this, the future of many pubs and restaurants also remains in doubt.
- 16.3** With this in mind there is a need to diversify our centres to promote vitality and vibrancy and their long-term sustainable future. The role of residential development will become more prominent in our town centres, with a drive from Central Government to provide higher densities in centres. In addition, the evening and tourism offer could continue to grow in our centres, following in the success of the award-winning old Town Hall redevelopment which has seen the arrival of a cinema and restaurants.
- 16.4** As the role of traditional retail reduces within our centres and new homes are built within them, their importance as community lifelines that connect our residents to services and the local environment will increase. The connectivity they provide as transport hubs to key services, open spaces and neighbourhoods will be essential and the services that are provided within them will foster a sense of community and vibrancy.
- 16.5** The Local Plan will reflect the Oldham Town Centre Vision that has been refreshed to include plans for around 2,500 modern homes, 1,000 new jobs and a linear urban park, in support of delivering Creating a Better Place. The proposals go beyond numbers to recognise that quality housing must be complemented by access to local services, public transport, shops and open space to improve quality of life and make Oldham an even better place in which to live, work, visit and do business. The refresh of the Vision coincides with Oldham Council's purchase of Spindles Town Square Shopping Centre in October 2020 to act as a catalyst for economic regeneration. Part of the shopping centre will be transformed into a modern home for Tommyfield Market traders, releasing the site of the current market hall for a brand-new linear park surrounded by new homes (see image below). The purchase of the shopping centre will also unlock other brownfield development sites in the town centre, allowing Oldham Council to put these forward for future housing and employment development.

### Oldham Town Centre Proposed Linear Park



- 16.6** Within Oldham Town Centre there is also the need to tackle the issue of detracting shop fronts and signage to improve wayfinding and enhance the conservation area in line with the Oldham Town Centre Conservation Area Appraisal Management Plan (CAAMP) SPD. The SPD also encourages the use of vacant heritage assets. The SPD can be viewed [here](#) <sup>(46)</sup>.
- 16.7** A Borough-wide Retail and Leisure Study was completed in September 2020 by Santec. The report provided an assessment of retail and leisure needs in Oldham and will help to inform new retail and town centres policies. The report concluded a number of findings, some of which are set out below.
- 16.8** The health of Oldham Town Centre and the borough's other centres were assessed. The summary of those health check assessments were:
- **Oldham** – the town centre is well represented in the convenience and comparison <sup>(47)</sup> goods sectors, the food and drink sector, and the professional services sector. However, there is a large proportion of vacant units. The town centre economy could be improved by reducing the number of retail units and repurposing them for other uses including office and residential.
  - **Shaw** – the proportion of convenience and comparison good retailers is as expected given the size of the centre. The district centre also commands a high average commercial rate and is very accessible by public transport. Despite the positives, the health of Shaw district centre is in decline. Since the last study there has been a significant increase in the amount of vacant units and there has been a gradual decline in the quality of the physical environment.

46 Oldham CAAMP SPD can be viewed here: [https://www.oldham.gov.uk/downloads/download/1599/oldham\\_town\\_centre\\_conservation\\_area\\_appraisal\\_and\\_management\\_plan\\_caamp\\_supplementary\\_planning\\_document\\_spd](https://www.oldham.gov.uk/downloads/download/1599/oldham_town_centre_conservation_area_appraisal_and_management_plan_caamp_supplementary_planning_document_spd)

47 Definitions of convenience and comparison goods can be found in the Glossary.



- **Royton** – the district centre is performing very well for a centre of its size. The proportion of comparison and convenience good retailers, retail services and professional services are largely in line with the national average.
- **Uppermill** – the district centre is performing well, with a good provision of retailers and services available within Uppermill. Whilst the district centre environment is positive overall, the accessibility of the centre could be improved by widening the walkways and creating new areas of public realm. This may prove difficult given the district centre is covered by a Conservation Area, and so any improvements to the public realm will need to consider that designation.
- **Lees** – the district centre accommodates a high proportion of comparison good retailers, but the provision of convenience good retailers is somewhat limited.
- **Hill Stores** – the provision of retailers and services within Hill Stores is as expected for a centre of this size. There is a concentration of vacant units to the north east of the centre, around the junction of Huddersfield Road and Ripponden Road. Some of these vacant units could be repurposed for other uses which may help increase the number of people visiting the centre.
- **Chadderton** – the centre is performing relatively well and accommodates a good provision of both comparison and convenience good retailers. The accessibility of the centre could be improved by creating better pedestrian links between Asda and the rest of the district centre.
- **Failsworth** – the centre is performing well with a good provision of both retailers and services. Much like Chadderton District Centre, accessibility through the centre could be improved, specifically pedestrian access across the canal.

#### 16.9 Key conclusions from the Retail and Leisure Study were:

- There is no ‘need’ for additional convenience retail provision over the life of the new Local Plan and therefore the Local Plan does not need to plan for any.
- There will be a small need over the plan period for comparison retail floorspace (2,381sqm) and it recommended this is focused in Oldham Town Centre.
- The existing retail hierarchy set out in the current Local Plan is still appropriate. That is:
  - Oldham Town Centre;
  - The centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill; and
  - Local shopping parades.
- The recommendation of a reduced local impact floorspace threshold<sup>(48)</sup> for assessing retail and leisure applications outside the borough’s centres from the

48 This is the size thresholds at which planning applications for out of town centre retail applications would be assessed

NPPF minimum of 2,500sqm to 1,500sqm for Oldham Town Centre and 300sqm for the other centres.

- A town centre boundary amendment was proposed for Lees Centre to incorporate the Co-op foodstore.

### **Retail and Leisure Questions**

1. Do you agree with the current retail hierarchy set out in the current Local Plan which has been judged as appropriate by the Retail and Leisure consultants of:
  - a. Oldham Town Centre;
  - b. The centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill; and
  - c. Local shopping parades?
2. Do you agree with the boundaries of Oldham Town Centre and the borough's other centres as set out in the Retail and Leisure Study? This includes an amendment to the boundary of Lees Centre. (The existing town centre boundaries can be found in Appendix 9 and the proposed amendment to Lees Centre can be found in Appendix 10)
3. Do you agree with the reduced local impact floorspace threshold of 1,500sqm for Oldham Town Centre and 300sqm for the other centres?
4. Housing development will be promoted in Oldham Town Centre and the borough's other centres, do you have any views on the level, density and type of housing that would be suited to the centres?

### **Oldham Town Centre**

**16.10** In relation to Oldham Town Centre specifically, some of the key findings of the Retail and Leisure Study were:

- Oldham Town Centre should seek to strengthen its food and beverage potential to help improve the evening economy.
- Investment in cultural and entertainment should be encouraged to diversify the town centre offer and also improve the evening economy.
- There is a lack of competition in Oldham Town Centre in relation to foodstores, and the town centre could benefit from more convenience stores, potentially as part of a residential-led mixed-use development.
- Further development opportunities should be identified on the edge of Oldham Town Centre to accommodate higher density mixed use development.
- Oldham Town Centre should have a tightly drawn primary shopping frontage to focus retail development in a smaller area and reduce vacancy rates elsewhere in the town centre.
- Successful high streets need to have a mix of independent shops, markets, retail chains, leisure and entertainment, community facilities and key services. When a large national chain vacates a unit and it is unlikely they will return, those units should be considered for one of the other uses.

### Oldham Town Centre Questions

5. There is a lot of work and plans underway for Oldham Town Centre, do you agree that Oldham Town Centre should have it's own policy in the Local Plan to reflect these plans and visions in more detail?
6. Do you agree with the approach to have a tightly drawn primary shopping frontage to focus retail development in a smaller area and allow a wider range of centre uses to locate elsewhere in the Town Centre?
7. Should the Local Plan attempt to 'zone' areas of the Town Centre, each zone would have a focus towards a specific type of development, be it cultural facilities, civic buildings or independent shopping for example?
8. Do you agree that the council should seek to identify further development opportunities on the edges of Oldham Town Centre for high density mixed use developments?
9. Should more areas of open space be created within Oldham Town Centre?
10. What amenities and services would you like to see within Oldham Town Centre to promote and encourage people to live there?
11. Do you think that office sites within Oldham Town Centre should be protected for office use? Options around this include:
  - a. The Local Plan designating an Article 4 in the whole of Oldham Town Centre in relation to the permitted development rights for the change of use from offices to residential? (this would mean that applicants wanting to change their offices into homes would have to apply for planning permission from the council, rather than be allowed to do it under permitted development rights); or
  - b. The Local Plan designating an Article 4 in a certain part of Oldham Town Centre in relation to the permitted development rights for the change of use from offices to residential?; or
  - c. The Local Plan having no Article 4 Directions in the Town Centre (as is now).

### Oldham Town Centre Allocations

**16.11** There are two saved UDP policies within Oldham Town Centre (plans can be found in Appendix 11). They are:

- TC1.1 Clegg Street, comprises the former bus station and the listed former Town Hall building and is allocated for retail and / or a range of other appropriate town centre uses; and
- TC1.2 Union Street is allocated for a cultural quarter.

**16.12** These allocations have been developed and their designation will be reviewed as part of this Local Plan.

## 17 Addressing Climate Change

- 17.1** In June 2019, Oldham Council declared its ambition to be the UK's first Green New Deal Council. It subsequently declared a Climate Emergency in September 2019. The Oldham Green New Deal Strategy was adopted by the council in March 2020. The Green New Deal will focus on building the green economy whilst cutting bills for residents and businesses, at the same time as meeting our environmental commitments and aspirations.
- 17.2** NPPF says that the planning system should help the transition to a low carbon economy. The Local Plan needs to help reduce greenhouse gases, mitigate flood risk, minimise vulnerability and improve resilience, and support renewable and low carbon energy.
- 17.3** There is the need to support Greater Manchester's and Oldham's climate change objectives to be carbon neutral.
- 17.4** The Local Plan can make a contribution to these objectives through the location and siting of development, the design of buildings and through using a natural capital approach to combating climate change such as the use of green infrastructure.
- 17.5** We will seek to address climate change through a positive approach on renewable and low carbon energy, flood risk, green infrastructure, design, air quality and transport infrastructure whilst assessing the location of development in relation to public transport and accessibility amongst other factors as part of site allocations.

### Renewable Energy and Low Carbon Energy

- 17.6** National planning policy and its practice guidance acknowledges that planning has an important role to play in the delivery of new renewable and low carbon energy infrastructure where the local environmental impact is acceptable.
- 17.7** It asks that Local Planning Authorities consider the local potential for renewable and low carbon energy. There is also the need for a positive strategy to ensure that growth is matched with secure, affordable and sustainable energy, particularly when we think about the levels of growth we are expecting across Greater Manchester and in Oldham.
- 17.8** This sits alongside Oldham having around 13% of households – over 12,000 homes in fuel poverty, despite 6,000 people being brought out of fuel poverty by Warm Homes Oldham.
- 17.9** Oldham currently performs poorly compared to the North West average in relation to installation of photovoltaics per capita (36% worse) and renewable energy generation per household (79% worse).
- 17.10** In addition to these issues and challenges, post coronavirus there may be an upwards shift in the demand to work from home, as more people have embraced different ways of working, and so the need for energy efficient homes will be important.
- 17.11** The government's Future Homes Standard consultation seeks to increase the energy efficiency requirements for new homes. It will require new homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency, to be introduced in 2025. Draft GMSF 2020 set a target for all new developments to be Net Zero Carbon by 2028 and included a policy on heat and energy networks.

**17.12** The Government has also consulted on The Future Building Standard which seeks to set energy and ventilation standards for non-domestic buildings, existing homes and includes proposals to mitigate against overheating in residential developments.

**17.13** The Local Plan needs to consider what further role it can have in helping to set a positive strategy for low carbon energy.

**17.14** Oldham Council has a strong history of action on climate change and wider environmental issues and has a delivery programme to tackle issues relating to climate change.

**17.15** The Oldham Green New Deal sets out two ambitious targets for achieving carbon neutrality:

- carbon neutrality for the council buildings and street lighting by 2025; and
- carbon neutrality for the borough by 2030.

**17.16** These targets reflect the council's commitment to, and understanding of, the urgency in helping to tackle the severe impact of the climate crisis. The Green New Deal Strategy sets out the overall approach to achieving these targets, enabled by the development of, and investment in, the 'green' sector in Oldham's local economy.

**17.17** NPPF makes it clear that we should consider whether to identify suitable areas for renewable and low carbon energy sources and areas where heat networks could be appropriate. A positive approach should also consider the location, mix and design of development and follow the energy hierarchy.

**17.18** The Green New Deal Strategy seeks to achieve these targets through measures such as:

- Investing in large scale renewable energy generation to meet carbon neutrality for the council after reducing CO2 emissions from buildings and street lighting as much as possible;
- Implementing local, meaningful and verifiable carbon offset measures such as tree planting;
- Developing a Local Energy Market to incentivise renewable energy development;
- Investing in and supporting the development and roll-out of large-scale low carbon anchor energy infrastructure such as low carbon heat networks. This type of infrastructure is capital intensive but can deliver a return on investment; can set the foundations for a heat system which can approach the required scale of change necessary to meet the 2030 borough wide decarbonisation target and can attract inward investment from the private sector; and
- Supporting the development of the Green Technology and Services (GTS) sector in Oldham and support and incentivise the wider business community to engage the GTS sector to decarbonise. Oldham has a strong base of engineering, connectivity and affordable premises which the sector needs. In 2013 there were 118 'green' businesses in Oldham.

**17.19** The Green New Deal Strategy has three pillars:

1. Green Economy;
2. Low Carbon; and
3. Northern Roots.

**17.20** The Low Carbon outcomes include:

- building renewable energy generation, including public and community owned schemes;
- developing low carbon housing, including enabling transition to electrical heating systems;
- enabling the redevelopment of Oldham Town Centre as a zero-carbon regeneration scheme;
- the creation of a council-led Oldham Virtual Energy Company to accelerate the finance, installation and operation of renewable energy and Nature Based Solutions; and
- tackling fuel poverty.

**17.21** There are several initiatives already underway or in place that will contribute to the development of a Low Carbon Local Energy Market including the RED WoLF project, Oldham Community Power and Oldham Energy Futures, new Oldham Town Centre renewable energy infrastructure and Oldham Partnership work on Community Wealth Building.

**17.22** The Local Plan can further help with identifying future opportunities for renewable and low carbon energy helping to meet NPPF and Oldham's ambitions.

**17.23** In addition, modern methods of construction, produced off site in factories, as opposed to traditional methods of construction on site tend to offer higher sustainability as well as reduced time and cost. Therefore, the Local Plan could state a preference for modern construction methods where this is suitable and possible to help with the move to low carbon as well as housing delivery and viability.

#### **Renewable Energy and Low Carbon Energy Questions**

1. Do you think the best way for the Local Plan to assist in carbon neutrality is to map opportunities for renewable and low carbon energy, including heat networks?
2. Should the Local Plan set a preference for modern methods of construction in housing developments where suitable and possible in order to encourage more sustainable and efficient construction styles?

#### **Flood Risk and Water Quality**

**17.24** We are all aware of the devastating impact that floods can have on communities as witnessed in early 2020 and in previous years across the country and locally. There are many partners working together to help reduce and manage flood risk including the Environment Agency, United Utilities and Oldham Lead Local Flood Authority.

**17.25** Planning also has a role to play when it comes to considering new development and change of use of existing buildings and assessing against flood risk. There is a need to reduce and manage flood risk from all sources, taking into account the cumulative impacts on areas susceptible to flooding and climate change.



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- 17.26** NPPF and its practice guidance sets out clear guidance for assessing planning applications and allocating sites. Strategic Flood Risk Assessments (SFRA) are used as part of our evidence in the Local Plan to determine whether sites are safe to allocate for development. This evidence can also be used to ensure that site allocation policies flag up what the site-specific flood risk assessment, if required, may need to address.
- 17.27** The Greater Manchester Strategic Flood Risk Assessment (GM SFRA) has also mapped opportunities for using natural processes to help mitigate flood risk. We can use this when allocating sites and assessing planning applications as a high-level indicator to there being an opportunity present for using natural processes, for example tree planting on the banks of a river. Therefore giving a platform to start discussions with developers from.
- 17.28** Flood Zone 3b, described as the functional flood plain, has been mapped and this can be used to ensure that land is safeguarded from development and can be used as a Green Infrastructure corridor.
- 17.29** One of the main flood risk issues in Oldham is from surface water flood risk. Drainage standards can be used to ensure that developments on greenfield land mimic greenfield runoff rates. In urban areas introducing surface water drainage systems (SUDS) through redevelopment of brownfield land can often improve a situation – replacing a development that historically may not have included any drainage scheme.
- 17.30** The Local Plan can set out what drainage standards should be applied to new developments. Appropriate drainage standards need to be determined and there is a need to promote the use of SUDS that offer multi-functional benefits.
- 17.31** The Local Plan will also address the need to protect water resources, improve water quality, re-naturalise rivers and waterways, improve public enjoyment and access to waterways.

### Flood Risk Questions

3. Which discharge rate for managing surface water should the Local Plan use?
  - National guidelines to not worsen drainage and if possible improve;
  - Existing standards which are referenced in the Greater Manchester SFRA. These are:
    - greenfield runoff on greenfield sites up to 1 in 100 year storm event, considering climate change;
    - a reduction in surface water runoff rates of at least 30% for brownfield sites up to 1 in a 100 year storm event, considering climate change;
    - a reduction in surface water runoff rates of at least 50% for brownfield sites within a Critical Drainage Area, with an aim of reducing runoff to greenfield rates up to a 1 in 100 year storm event, considering climate change; and
    - development must be designed so there is no flooding to the development in a 1 in 30 year event and so that there is no property flooding in a 1 in a 100 year plus climate change event.
  - An alternative option. Please submit suggestions.
4. Do you think the existing approach of all planning applications over 0.5 hectares within a critical drainage area should continue to be required to submit a Flood Risk Assessment?
5. Should Oldham have a policy that requires all development to incorporate SUDS, unless demonstrated to be unfeasible?
6. Do you agree with using natural processes as a way to mitigate flood risk?

## 18 The Natural Environment and Open Land

**18.1** There is a need to continue protecting and enhancing nature designations, to increase tree cover, to restore and enhance river and canal corridors and to move away from a 'no net loss' of biodiversity to achieving biodiversity net gains.

### Green Belt

**18.2** The review of the Green Belt boundary is being done at a Greater Manchester level through Places for Everyone. The Local Plan will therefore not address Green Belt boundary revisions. However, we need a positive approach for the Green Belt going forward. As part of this, and taking into consideration that land is proposed to be removed from the Green Belt at a Greater Manchester level, the Local Plan needs to embed offsetting compensatory improvements to the remaining Green Belt land.

**18.3** Evidence has been gathered at a Greater Manchester level on Green Belt enhancement opportunities focussed on projects falling under the following headings:

- Access;
- Sport and recreation;
- Biodiversity and wildlife corridors; and
- Landscape and visual.

**18.4** These are summarised below. They are however suggestions and do not have formal agreement:

**Table 7 Potential Green Belt Enhancement Opportunities**

Potential enhancement opportunities
<b>Access</b>
Introduce local level Public Rights of Way (PRoW) to create linkages to recreational routes / Green Belt from the existing settlement edges to enhance access opportunities for both cyclists and pedestrians.
Upgrade Public Footpaths / create formalised PRoW links / implement access improvements to create a better connections.
Improve access control to ensure accessibility of the existing PRoW network, including the creation of new multi-user routes for recreational and health benefits.
Provide surfacing improvements and improve crossing points.
Improve east-west pedestrian connections across the Rochdale Canal.
Address gaps in the continuity of the cycle network.
Improve existing access points across the route of the Manchester Metrolink.
Extend / upgrade the Beeway network improvements to improve off road cycle access and walking routes.
Develop well waymarked and easily accessible circular 'health' walks.

## Potential enhancement opportunities

Develop a coherent and improved interpretation strategy to improve visitor experience along the network of long distance footpaths.

Upgrade the lighting provision and drainage.

### Sport and recreation

Improve access and visitor facilities at Tandle Hill Country Park. Introduce pedestrian gateway features at Public Footpaths to encourage pedestrian access into Tandle Hill Country Park.

Offer accessible sports packages to local residents and provide stronger links between existing private sports facilities.

Improve drainage systems and ancillary accommodation within existing playing fields.

Develop a partnership to guide the future management of Daisy Nook Country Park, incorporating a review of visitor facilities and opportunities for 'natural play'. Improve existing features within Daisy Nook Country Park; including the car park and visitor facilities.

Create recreational facilities which afford views towards the Peak Fringe backdrop.

Enhance the landscape around Dove Stone Reservoir for improved recreational and educational uses.

### Biodiversity and wildlife corridors

Supplement and enhance existing Green Infrastructure networks to provide both landscape and ecological benefits.

Enhance the ecological and hydrological beneficial features within retained Green Belt by combining flood risk reduction (including the alleviation of surface water flood risk issues) with green infrastructure improvements.

Promote and manage wildlife corridors in a way that encourages the movement of species to counter the existing fragmentation of habitats.

Protect and enhance semi-natural habitats and networks, including:

- riparian, broadleaved and ancient woodland tracts; and
- the tracts of heather moorland, blanket bog, acid grassland and broadleaved woodland associated with the upland landscape. Encourage the natural regeneration of woodland and wetland habitats in order to slow the water flow towards the River Tame below.

In addition, explore opportunities for habitat enhancement such as ponds for amphibians.

Improve river corridor flood risk management as well as alleviate surface water flood risk issues. This could be achieved through the use of SuDS and water storage techniques.

### Landscape and visual

Retain the role of the landscape as an undeveloped backdrop to existing development through the enhancement of semi-natural habitats, including woodland tracts and grassland.

### Potential enhancement opportunities

Deliver large tracts of planting through the Northern Forest initiative, providing a significant contribution to containment and visual separation.

Reinforce the contrast between the well wooded lower slopes and the sparsely vegetated upper moorland through the introduction of structural planting around Dove Stone Reservoir.

Consider incorporating green roof schemes, such as green roof bus stops, in the surrounding urban landscape to compensate for loss of vegetation.

Maintain views towards the war memorial at Tandle Hill Country Park through the appropriate management of vegetation.

Review woodland management practices along the valley floor in order to emphasize the gap between discrete settlements.

Create stronger links between communities and river corridors. This could involve the expansion and maintenance of the PRoW network as well as the integration of opportunities for 'natural play'.

Introduce screen planting along the settlement fringe, employing locally-appropriate species, to help minimise long term visual impact on both residential and recreational receptors within the landscape.

Maintain and enhance the pattern of traditional species rich hedgerow field boundaries, stone walling and woodland within the wider landscape. Large scale planting of broadleaved woodland could be adopted to enhance habitat connectivity.

**18.5** The delivery of the suggested enhancement opportunities will be down to individual Greater Manchester districts to implement and embed into their Local Plans. Delivery via different funding streams and mechanisms will be key to implementation. The evidence offers a list of projects that the council is likely to need to prioritise and the council will also need to update the list as new evidence emerges for example on open space provision.

### Green Belt Questions

1. As part of determining priorities and understanding local need what do you think the priority should be in your local area from the type of projects set out above?
2. Are there other Green Belt enhancement opportunities that are not identified that you feel there is a need to deliver?

### Local Green Space

**18.6** Currently there are 22 designated Other Protected Open Land (OPOL) sites allocated in the current Local Plan. The below OPOL designations are proposed for development as part of Draft GMSF 2020.

- OPOL 9 (as part of Policy GM Allocation 14 Broadbent Moss);

- OPOL 10 (as part of Policy GM Allocation 12 Beal Valley); and
  - OPOL 22 (as part of Policy GM Allocation 16 Cowlshaw).
- 18.7** There is no reference to OPOL in NPPF however it does set out an approach for LGS. LGS is a way to provide special protection against development for green areas of particular importance to local communities. A LGS can only be designated through a Local Plan or Neighbourhood Plan. To align with NPPF it is proposed that OPOL be renamed LGS.
- 18.8** National Planning Practice Guidance states that “*designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt.*”
- 18.9** NPPF states the LGS designation will not be appropriate for most green areas or open space. The designation should only be used:
- Where the green space is in reasonably close proximity to the community it serves.
  - Where the green space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.
  - Where the green space concerned is local in character and is not an extensive tract of land.
- 18.10** The policy approach used for LGS is likely to be consistent with national policy on Green Belt in terms of how development proposals are assessed.
- 18.11** The council has therefore re-assessed OPOL against the LGS criteria in NPPF to ensure that any OPOL sites carried forward as Local Green Space can be justified by up to date robust evidence. OPOL sites are becoming increasingly under pressure for housing development and so it is important that an up to date assessment is prepared to help protect the OPOL sites that meet the LGS criteria.
- 18.12** The outcome of the assessment is shown below, together with any opportunities to enhance the future LGS. All of the sites assessed were considered to be reasonably close to the community and local in character and not an extensive tract of land. A heritage significance assessment has inputted into the LGS Assessment. For some sites this has identified where the historic environment, often linking to recreation, could be enhanced. Please see Appendix 12 for plans of proposed de-designated, new and amended LGS's.



**Table 8 Assessment of OPOL against Local Green Space Criteria**

OPOL	Does the site meet Local Green Space Criteria	Identified enhancement opportunities
OPOL 1 – Royley Clough, Royton – with extension including cricket ground	Yes. The OPOL, with the proposed extension, meets the criteria based on ecology, beauty, historic significance and recreation.	N/A
OPOL 2 – Ferrey Field Road	Yes. Overall the land is considered to be of local significance due to ecology.	N/A
OPOL 4 – Foxdenton Hall Park with extension including Foxdenton Hall Park and Albert Taylor Recreation Ground	Yes. It is considered that the OPOL with the proposed extension is of local significance due to recreation, historic significance, beauty and ecology.	There is an opportunity to enhance the historic environment by opening the hall to the public and offering updated interpretation boards and a heritage trail around the locations of former estate buildings such as the farm and the icehouse. In addition, the sundial should be restored to its former position.
OPOL 5 Crossley Bridge Playing Fields	Yes. It is considered that the site is of local significance due to its recreational value.  It is considered that the boundary should be amended to the residential development.	N/A
OPOL 6 Moston Brook and Hole Bottom Clough	Yes. It is considered that the site is of local significance due to beauty, recreation, historic significance, wildlife and tranquillity.	Improvements could be made in line with Moston Brook feasibility study and master plan.
OPOL 7 Simkin Way	Yes. It is considered that the site is of local significance due to historic significance.	N/A
OPOL 8 Oldham Edge	Yes. The land is considered to be of local significance due to wildlife, historic significance, recreational value and also tranquillity and beauty in parts of the site.	There is opportunity to enhance historic significance further with heritage trails and interpretation boards. The public sculptures appear to coincide with the locations

OPOL	Does the site meet Local Green Space Criteria	Identified enhancement opportunities
	<p>It is considered that the boundary should be amended to exclude the school sports hall extension.</p>	<p>of historic routeways and interpretation could be offered as to what these actually mark. There are opportunities to highlight the historic routeway towards Royton as well as fieldwalk the landscape to find any possible remnants of historic mining.</p> <p>Historic documents show that the Edge was an important location for early coal mining and interpretation boards and heritage trails could also highlight this. They could also be used to highlight the location of Post-Medieval farmsteads and settlements across the Edge and open up more publicly accessible footpaths across the higher ground.</p>
OPOL 9 Bullcote Lane	<p>No. The site is not considered to be of local significance against the Local Green Space criteria.</p> <p>The site has been put forward as a strategic allocation in Places for Everyone.</p> <p>The OPOL is proposed to be de-designated.</p>	N/A
OPOL 10 Shawside	<p>The land has areas that are rich in wildlife and offer a recreational role (to the north).</p> <p>However, as NPPF states identifying land as LGS should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.</p>	N/A

OPOL	Does the site meet Local Green Space Criteria	Identified enhancement opportunities
	<p>LGS should only be designated when a plan is prepared or reviewed, and is capable of enduring beyond the end of the plan period.</p> <p>The site has been put forward as a strategic allocation in Places for Everyone.</p> <p>If the strategic allocation goes ahead the elements that meet the LGS criteria should be considered as part of the master planning exercise and planning application, particularly in terms of ecology.</p> <p>Therefore the OPOL is proposed to be de-designated.</p>	
OPOL 11 – Land at Greenacres, including Lees Cemetery and Mills recreation ground	<p>Yes. The land is of local significance due to its beauty, tranquillity, wildlife, recreational value and historic significance.</p> <p>It is considered that the boundary should be amended to remove Roundthorn Primary School and The Hawthorne and associated brownfield land. These parts of the existing OPOL are not considered to contribute to the LGS criteria. It is also considered that Lees Cemetery and the Mills recreation ground should be added to the LGS.</p>	<p>There are several opportunities to enhance historic significance further at Greenacres by offering heritage and geological trails, as well as interpretation boards. Some of the current boards are in poor condition, heavily vandalised and repetitive; it is felt that they could be more specific to the area in which they are located.</p> <p>There is an opportunity to create a geologically focused heritage trail at Glodwick Low, to incorporate and celebrate its status as a regionally important geological site.</p> <p>Interpretation boards could also be used to highlight historic remnants of quarrying and mining and identify potential signs of Medieval coal extraction, such as bell pits and adits. The former textile industry in this area has been utilised within the public realm, however the</p>

OPOL	Does the site meet Local Green Space Criteria	Identified enhancement opportunities
		<p>reused engine beds have no accompanying interpretation and it is felt that these need further explanation.</p> <p>Other features such as the Roman Road and the Medieval corn mill could also be highlighted or even targeted for any future archaeological work. There is also an opportunity to celebrate Clem Beckett at Glodwick Lows as well.</p>
OPOL 12 – Thornley Brook East	<p>Yes. The land is of local significance due to its beauty, wildlife, tranquillity, historic significance and local recreational value.</p> <p>An application was approved for 265 homes on part of the OPOL. This part of the OPOL has not formed part of the assessment and will not be taken forward as Local Green Space.</p>	N/A
OPOL 13 – Stonebreaks	<p>Yes. The land is of local significance due to its beauty, tranquillity, historic significance and local recreational value. A small part of the site is also of local significance due to its ecology.</p> <p>It is also considered that a small extension to the north of the OPOL could form part of the designation.</p>	N/A
OPOL 14 Dacres Hall	Yes. The land is of local significance due to beauty, tranquillity, historic significance and wildlife.	N/A

OPOL	Does the site meet Local Green Space Criteria	Identified enhancement opportunities
OPOL 15 Wall Hill	Yes. It is considered that the existing OPOL is locally significant due to historic significance and ecology.	There are already a number of interpretation boards on the former Delph Donkey railway line bordering the Site, which includes a small part on the former Bankfield Mill, and there is an opportunity to open up access to the wooded area and extend the heritage trail here. There is also an opportunity to consolidate the ruins and explore the area archaeologically as well in the future.
OPOL 16 Ryefields Drive	Yes. The land is of local significance due to its beauty and richness in wildlife.	N/A
OPOL 17 Stoneswood	Yes. The land is considered to be of local significance due to its historic significance and richness in wildlife.	N/A
OPOL 18 Rumbles Lane / Lumb Mill	No. Although the site will add to the attractiveness of the area it is not considered that the site is demonstrably special against the reasons set out in NPPF.	N/A
OPOL 19 Ainley Wood	Yes. The site is considered to be of particular local significance due to its beauty, tranquillity, historic significance and richness in wildlife.	There are opportunities to enhance this historic significance further through a heritage trail and interpretation boards focused on the former Hull Mill and the possible Roman Road towards the nearby Castleshaw fort. There is also an opportunity to explore Hull Mill archaeologically and consolidate any standing remains.
OPOL 20 Land South of Oaklands Road	No. Although a section of the site provides some priority habitats it is not considered that the whole site should be designated as LGS due to this alone as the extent is small in comparison to the whole site. The site is a rail embankment.	N/A

OPOL	Does the site meet Local Green Space Criteria	Identified enhancement opportunities
OPOL 21 Land at Summershades Lane	Yes. It is considered that the site is of local significance due to richness in wildlife and historic significance.	The historic significance mostly derives from the sites former use as pleasure gardens from the late 19th to mid-20th century. Some of these features still survive, although the site has not been maintained. There is an opportunity to restore these features and make public access easier to this site.
OPOL 22 Cowlshaw	<p>The land has areas that are rich in wildlife. However identifying land as LGS should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.</p> <p>LGS should only be designated when a plan is prepared or reviewed, and is capable of enduring beyond the end of the plan period. The site is proposed as a strategic allocation and part has planning permission.</p> <p>It is considered that to designate the land as LGS would not be consistent with the local planning of sustainable development.</p> <p>However, any development proposals must follow the biodiversity mitigation hierarchy and provide a net gain in biodiversity in line with NPPF.</p>	N/A
OPOL 23 Rear of Elk Mill / Cotswold Drive	Yes. It is considered that the site is of local significance due to beauty, ecology, tranquility and recreational value.	N/A
Sholver Lane (new site)	Yes. It is considered that the site is of local significance due to beauty, ecology, historic significance, recreation and tranquillity.	There are opportunities here to enhance the historic environment with a community project focused around Meg Well and the colliery site, as well as further research



OPOL	Does the site meet Local Green Space Criteria	Identified enhancement opportunities
		building on Lathams report in 2008 on the history of Sholver. A heritage trail could also be implemented, detailing the history of Sholver and linking to the former Village Green.

### **Local Green Space Questions**

3. Do you agree that the sites that have met the Local Green Space criteria should be designated as Local Green Space?
4. Are any of the proposed LGS designations particularly special to you? If so, which one(s) and why?
5. OPOL 18 and 20 have not met the LGS criteria. Should they either be allocated for development, safeguarded for future development needs or left unallocated?
6. Are there any other sites that are not already designated (e.g. Green Belt) that you think could meet the Local Green Space criteria and should be protected from inappropriate development?
7. If inappropriate development does take place on future Local Green Spaces, which would be treated in line with Green Belt policy, do you think the council should seek compensatory enhancement measures to either the remaining Local Green Space or others?
8. Are there other enhancement opportunities for future Local Green Spaces that should be identified?

## 19 Green Infrastructure

- 19.1** Green Infrastructure is an umbrella term used to describe a range of assets such as open space, playing fields, woodland (including ancient woodland), residential gardens, sustainable drainage features, trees, green roofs and walls and 'blue infrastructure' such as river corridors, ponds and canals, which all offer habitats for biodiversity.
- 19.2** Green Infrastructure provides us with many ecosystem benefits at a range of scales, such as helping to mitigate climate change and flood risk, cooling us, providing space to exercise, play and enjoy tranquillity, habitats for biodiversity, space to grow food and energy production and it is also linked to having economic benefits, through providing well-designed places where people want to live and work.
- 19.3** In Oldham, we have our parks, countryside, recreational routes, woodland (including ancient woodland), canal corridors and local open space and sports facilities that provide us with enjoyment, are integral to our quality of life and are important environmental assets. Together they create a network of Green Infrastructure.
- 19.4** We need to identify our Green Infrastructure Network in the Local Plan and form a strategy for how we can protect and enhance this network to obtain maximum ecosystem benefits and improve connectivity for both residents and nature.
- 19.5** Given that Green Infrastructure is capable of delivering such vital services, we need to determine how we can use Green Infrastructure to Oldham's advantage as part of creating a better place.
- 19.6** Greater Manchester Ecosystem Opportunity mapping has been prepared which identifies which ecosystems benefits have the highest opportunity of being improved on parcels of land across Greater Manchester, using Green Infrastructure. This looks at water quality, flood risk mitigation, amenity, leisure and recreation, biodiversity and ecological networks, air quality, timber and carbon sequestration.
- 19.7** Evidence at a Greater Manchester level has also identified Green Infrastructure Opportunity Areas. In Oldham this includes the South Pennine Moors and Moston Brook Corridor. Development within and around these areas should be consistent with delivering major Green Infrastructure improvements.
- 19.8** The Greater Manchester Local Nature Recovery Strategy (Nature Recovery Plan) is also being prepared. This will include a habitat map, an ecological description of the area and priorities for enhancing nature. The Local Plan and evolving Green Infrastructure Strategy will need to support this.
- 19.9** Growing populations and increased development, across the borough and particularly within our town centres, means that accessing Green Infrastructure could become increasingly difficult. Access to this important asset should not be limited to countryside and park visits but should be embedded within the built environment in and around where people live. In our everyday lives, whether it's going to school, work, the shops and places of leisure, we can directly connect with Green Infrastructure. This can be through design measures such as green roofs and walls, residential gardens, soft landscaping, tree and vegetation planting, green walkways and cycle routes, improved access to the countryside and better signposting of open space, sport and recreation facilities.

- 19.10** Above all, we need to ensure a balance between providing a local network of Green Infrastructure that is useable and accessible for all ages and abilities, but that also protects wildlife and important natural assets where necessary.
- 19.11** To help set out how Green Infrastructure is to be improved and delivered within Oldham, a Green Infrastructure Strategy for Oldham is needed using the guidance for Greater Manchester on embedding Green Infrastructure principles and incorporating local aspirations. The Strategy will need to set out the findings and standards of an updated Open Space Study, identify future management practices and set out an action plan for these open spaces. It will also collate evidence on the wider Nature Recovery Network within Oldham and provide policy guidance for the Local Plan.
- 19.12** BREEAM (Building Research Establishment's Environmental Assessment Method) is a widely recognised, externally verified assessment method for developments. It aims to set the standard for best practice in sustainable design awarding credits in ten categories accordingly to performance. The awarding of credits produces an overall score on a scale of Pass, Good, Very Good, Excellent and Outstanding. The assessment is managed by a BREEAM accredited consultant with external verification from the relevant body. BREAM covers a number of categories including energy, water, pollution and waste.
- 19.13** It is envisaged that if the council adopted BREEAM it would stipulate a minimum rating of Very Good is achieved which demonstrates advanced good practice in sustainable construction.
- 19.14** [Building with Nature](#) <sup>(49)</sup> (BwN) is an accreditation scheme which promotes high quality green infrastructure in development. The BwN Standards can be used at design and post construction stages. They assess a scheme in respect of health and wellbeing, sustainable water management, ecology and biodiversity. There are 23 BwN standards in total and developments can achieve three standards of accreditation:
- Design
  - Full (good) or
  - Full (exemplary).
- 19.15** It will important for the Green Infrastructure Strategy to consider the different options put forward above as a mechanism for delivering green and blue infrastructure.

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49 Building with Nature available at: [buildingwithnature.org.uk](https://buildingwithnature.org.uk)

### Green Infrastructure Questions

1. To ensure green infrastructure is embedded across the borough and within our built environment, which of the following options would you prefer?
  - a. the use of a green infrastructure checklist?; or
  - b. the use of BREEAM as described above; or
  - c. the use of Building with Nature accreditation scheme; or
  - d. an alternative? Please provide details.

Please provide a justification for your preferred choice.

2. Do you think the Local Plan should set out a specific distance for buffers between new development and sensitive areas (such as nature designations and ancient woodland) and if so what should this be?

### Biodiversity

**19.16** Oldham is rich in biodiversity, owing to the vast amount of Green Infrastructure in the borough. The hierarchy of biodiversity ranges from European to local designations. There are the South Pennine Moors, a Special Area of Conservation (SAC) and Special Protection Area for birds. There are five national Sites of Special Scientific Interest (SSSI), one Regionally Important Geodiversity Site (RIGS) (Glodwick Brickpit) in the borough and 38 Sites of Biological Interest (SBI), which has increased from 18 SBIs since 1984. Oldham also has a Local Nature Reserve (Glodwick Lows) and areas of ancient woodland.

**19.17** Biodiversity also exists outside of designations of course and it is important to keep building these ecological networks to protect and enhance biodiversity in a way that can provide other benefits such as cleaner air.

**19.18** There is a threat to biodiversity if we take no action and the wealth of policy reports and evidence shows that this issue is being taken increasingly seriously. Some pressures are down to factors that planning has less control of, such as land management / agricultural practices. However, the pressure of growth and new development could have a detrimental impact without action taken.

**19.19** NPPF no longer seeks 'mitigation' to offset biodiversity loss. It calls for 'net gain', embedding Defra's 25 Year Environment Plan. Planning practice guidance explains that net gain in planning describes an approach to development that leaves the natural environment in a measurably better state than it was beforehand. Net gain is an umbrella term for both biodiversity net gain and wider environmental net gain.

**19.20** This must be done following the biodiversity hierarchy of international, national and local designated sites and also the mitigation hierarchy of doing everything possible to avoid and then minimise the impact on biodiversity and then, only after taking all measures into account, compensate for losses that cannot be avoided. Measurable net gain is then applied on top of this approach. If biodiversity net gain cannot be achieved on-site then off-site contributions will be required.

**19.21** The Greater Manchester biodiversity net gain guidance sets out good practice principles on biodiversity net gain:

- Apply the mitigation hierarchy – do everything possible to first avoid, and then minimise, impacts on biodiversity. Only as a last resort and in agreement with external decision makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere;
- Avoid losing biodiversity that cannot be offset by gains elsewhere and avoid impacts to irreplaceable biodiversity. Impacts on irreplaceable biodiversity cannot be offset to achieve no net loss or net gain and should be excluded from any biodiversity metric calculations;
- Be inclusive and equitable. Achieve net gain in partnership with stakeholders where possible;
- Address risk. Mitigate uncertainty and other risks;
- Make a measurable net gain contribution;
- Achieve the best outcomes for biodiversity;
- Be additional - net gain must be additional to existing conservation activities;
- Create a net gain legacy - ensure long term benefits;
- Optimise sustainability - prioritise biodiversity net gain and where possible optimise the wider environmental benefits; and
- Be transparent - communicate net gain.

**19.22** The council needs to ensure we put in place measures to be ready for implementing biodiversity net gain when the Environment Bill is passed which is expected to include a two year transition period and that biodiversity net gain becomes an integral part of delivering Green Infrastructure, including Nature Recovery Networks.

**19.23** The latest update to the forthcoming Environment Bill includes a requirement for all future schemes including the development of land to deliver a mandatory 10 % biodiversity net gain. This net gain will be required to be maintained for a period of at least 30 years.



### Biodiversity Questions

3. It may not always be possible to achieve the full biodiversity net gain on the development site. In this case, how important is it for money to be spent in the immediate locality?
  - Very important;
  - Quite important but could be spent elsewhere within close proximity; or
  - Not important.
4. It may not always be possible to offset the right type of habitat close to the development site – would you support net gain being delivered on the following local projects?
  - Appropriate council priorities and programmes, such as Northern Roots.
  - Areas identified within the Nature Recovery Strategy.
  - Local authority owned countryside sites.
  - Green Belt enhancement.
5. Do you think there are any instances where a higher than the minimum 10% biodiversity net gain should be applied to developments?

### Residential Gardens

- 19.24** Residential gardens cover a significant portion of land across towns and cities and cumulatively form a significant Green Infrastructure asset, providing a range of ecosystem benefits as well as connecting wildlife to wider green spaces and improving health and wellbeing. Individually, a residential garden may appear insignificant, however collectively they contribute a large proportion of green space within the urban area, which becomes especially important at larger scales.
- 19.25** Concentrating development within the urban area and/ or limited opportunities for small-scale development, can lead to increased pressure to re-develop residential gardens.
- 19.26** The My Back Yard research project in Manchester demonstrated that the estimate of green and blue space within Manchester is less than previously assumed (49% compared to 58%). Whilst the project focused on Manchester, diminishing green space in gardens is a pertinent issue across many urban areas and the lessons set out within the project are transferable to Oldham.
- 19.27** Less green space in residential gardens means that the potential benefits they provide to people are reduced. The more this is reduced the bigger the wider impact of the loss of this important green infrastructure asset. This has implications for the future resilience of an urban environment and the health and well-being of residents.
- 19.28** In some cases, such as apartment development, it will not be practical or appropriate to provide private residential gardens. However, it is important that amenity space be provided for these residents, perhaps in the form of shared gardens/ space, so that all residents can access the benefits of nature close to home.

**19.29** Permitted development allows certain redevelopment of residential gardens, such as paving with permeable materials at a defined size. However, council's can also set their own restrictions as necessary.

### Residential Gardens Questions

6. Should Oldham:
- a. restrict the paving over of front gardens for all new residential developments, allowing for a small number of exceptions (e.g. accessible parking/ access, appropriate permeable materials); or
  - b. restrict the future paving over of front gardens, as above, but only for new developments within areas of identified open space deficiency;
  - c. ensure all residential developments provide appropriate garden/ amenity space, through setting minimum requirements as appropriate to the type of development and taking open space deficiencies into consideration;
  - d. restrict the redevelopment of garden land for new homes, except in special circumstances or outside of the urban area; or
  - e. not restrict the development of garden land. If so how can we ensure gardens are protected and enhanced as a key function of green infrastructure?

### Landscape

**19.30** Oldham's rural landscapes also gives the borough local distinctiveness, with ten-character types identified in Oldham through the Greater Manchester Landscape Character Assessment. Each landscape character type has been given guidance for opportunities for future development and landscape management / enhancement. This will need to be embedded into the Local Plan.

### Open Spaces

**19.31** The housing need and supply for Oldham over the next 20 years is perhaps the most significant pressure on open space, sport and recreation provision within the borough. The increased housing need and limited supply means there may be increased pressure on existing open space provision (with these spaces serving more people) and open spaces may be vulnerable to development. Whilst proposed large scale development creates further pressure on the existing open space provision and will require new provision to support the future communities.

**19.32** There are also other pressures on open space provision, including the implications of reduced capacity for the council to own and maintain some of its stock of green and open spaces due to budgetary pressures.

### Open Space Questions

7. All new major housing developments will contribute to open space provision. Should this:
  - a. be in the form of onsite provision in the first instance, and contributions to offsite provision if this is not possible, or;
  - b. should an alternative approach be taken regarding provision/ contributions to open space provision?
8. What type of open spaces should be provided for local areas?
9. How can the Local Plan ensure access to the wider countryside is enhanced?
10. Should sites be allocated for new open spaces and if so should they specify a use e.g. play space, natural space, outdoor sports?

### Food Growing / Community Garden Opportunities

- 19.33** Across the UK, community food and growing projects are providing opportunities for local people to come together, improve the appearance of open spaces, promote healthier food choices and stimulate new local food economies. The best-known campaign is Incredible Edible, which started in Todmorden in West Yorkshire and has since spread to communities all over the world, aiming to increase participation in local food growing to produce a number of positive outcomes for individuals and communities.
- 19.34** There is a need to understand existing local food growing schemes and projects and explore the opportunities for potential new food growing projects across the borough. There is also a need to understand the existing supply and demand of allotments within the borough. Allotments are a key community resource to foster social interaction, health and wellbeing and develop food growing and horticultural education and skills.
- 19.35** There are already a number of programmes, such as Get Oldham Growing, which recognise the impact of growing and eating local food on the health and wellbeing of communities. The programme works in partnership with local people, community groups and local organisations to improve people's health, skills and environment through growing, cooking and eating local food. From supporting access to land and schools grounds to increasing the number of community garden sites and local food enterprises, Get Oldham Growing's vision is to further establish Oldham as a borough with a thriving local food culture and economy. Oldham is also currently working to achieve a silver sustainable food - places award, this is a network that brings together pioneering food partnerships from towns, cities, boroughs, districts and counties across the UK that are driving innovation and best practice on all aspects of healthy and sustainable food.
- 19.36** There is also need to ensure there is adequate provision for localised food production, to ensure food growing and community education projects are supported and encouraged.

### **Food Growing / Community Garden Questions**

11. Do you think new housing developments over a certain threshold should provide space for food growing?
12. Should sites be set aside specifically for food growing, if so, are there any appropriate sites you know of?

### **Protection of Trees**

**19.37** The council currently has a saved planning policy on protecting trees, this can be found in Appendix 13. It is saved from the 2006 Unitary Development Plan (UDP) and is called Policy D1.5 'Protection of Trees'. The policy outlines the circumstances in which the council will permit proposals for the development of a site containing trees or adjoining a site containing trees.

### **Protection of Trees Question**

13. Do you think Oldham should continue to have a policy regarding the protection of trees?

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## 20 The Built Environment

### Oldham's Historic Environment

- 20.1** NPPF acknowledges that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to quality of life.
- 20.2** NPPF states Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.
- 20.3** Oldham with its hugely significant industrial past is rich in heritage with 549 listed buildings, including mills, churches and civic buildings as well as residential properties, 36 Conservation Areas; three registered park and gardens; and two scheduled monuments.
- 20.4** There are also other records on the Historic Environment Record (HER) including blue plaques and canals. Non designated assets are also part of Oldham's heritage.
- 20.5** Publications by Historic England, demonstrate that the heritage sector is an important source of economic growth and prosperity as heritage attracts millions of tourists each year and generates heritage related jobs. Places with strong, distinctive identities are more likely to prosper and heritage adds to people's perception of a place. Places that are aesthetically pleasing encourage people to congregate there and is a pull factor for businesses. Research shows that areas that have had investment in the historic environment are more likely to have a higher footfall and higher amount of spending than previously.
- 20.6** Heritage also offers other benefits such as having a positive impact on health and well-being and community cohesion.
- 20.7** This is evidenced by way of example with the conversion of the listed Oldham Town Hall into a cinema and restaurant complex. The conversion has helped in increasing a sense of civic pride and place locally, bolstering the Town Centre's family-friendly credentials, attracting more affluent customers into the Town Centre and laying the ground for an 'after-work' culture in the Town Centre and revitalised evening economy. Previously, the vacant Old Town Hall discouraged people from venturing further down Yorkshire Street.
- 20.8** However, heritage has its threats, issues and challenges that we need to address in Oldham. There are 10 entries on Historic England's 'At Risk' Register, including Oldham Town Centre Conservation Area. A further 20 Conservation Areas in Oldham are 'vulnerable'. There is a need to protect and enhance these at-risk heritage assets to ensure their long-term use, whilst also contributing towards other environmental, social and economic objectives.
- 20.9** Heritage assets that are left in bad condition and vulnerable to further decay, make it more difficult to secure a viable long-term use. This can lead to socio- environmental degradation including crime, vandalism and fly tipping, resulting in a poor image associated with the area. This has certainly been the case with some assets in Oldham.

- 20.10** Therefore a positive strategy is needed that balances the need to protect and enhance heritage assets with the needs and challenges in Oldham, such as housing growth and viability concerns. Alongside this, for site allocations a Heritage Impact Assessment will need to be carried out to assess any impacts on the significance of heritage and any mitigation required or opportunities for enhancement to the heritage assets.
- 20.11** Two particular areas that we are focussing on with Historic England, in addressing our local issues and which will form the basis for our strategy in the Local Plan is the future use of textile mills and seeking to enhance Oldham Town Centre Conservation Area with the aim of removing it from the 'at risk' register.
- 20.12** Some of the negative features and opportunities for enhancement in Oldham Town Centre are detracting features, such as vacancy. A number of key buildings in the town centre are vacant and in poor condition. There are widespread issues with the condition of the buildings within the conservation area including general upkeep and repair. However, the most significant detracting feature is retail frontages, where the poor-quality contemporary shopfronts dominate handsome buildings. Roller shutters also create a deadening frontage and the perception of crime and antisocial behaviour.
- 20.13** Wayfinding, needing a stronger identity and vacant sites are also key issues to be addressed.
- 20.14** The Conservation Area Appraisal proposes four extensions to the existing Oldham Town Centre conservation area boundary. The extensions have been designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and will be treated as a material planning consideration until formally adopted through the Local Plan review process.
- 20.15** The appraisal also identifies seven buildings that could be added to a local list for non-designated assets, were one to be established, to flag up that they carry some significance when assessing planning applications. These are:
- Hilton Arcade;
  - Greaves Arms;
  - 3 Greaves Street;
  - Victoria House, Greaves Street;
  - The Old Bill, Greaves Street;
  - 31 Queen Street; and
  - The Old Museum (Former Friends House and Former Museum), Greaves Street.
- 20.16** A Conservation Area Management Plan has been prepared with planning policies to tackle the above issues. This has been adopted as a Supplementary Planning Document and will need to be embedded into the Local Plan as appropriate.



### Historic Environment Questions

1. Do you agree that the proposals map should incorporate the proposed extensions to the Oldham Town Centre conservation area (see Appendix 3)?
2. Are there any other particular policy areas the Local Plan needs to address in relation to heritage?
3. Should there be localised (district level) heritage policies for different parts of Oldham?

### Oldham's Mills

- 20.17** A Mills Strategy is underway to set out which undesignated (unlisted) mills are the highest priority in terms of their historic significance with opportunity to be retained and put to a sustainable use and which mills are of lower priority and may offer potential for alternative redevelopment.
- 20.18** A separate report feeding into this is a landscape overview providing an overall analysis of the contribution existing mills make to the landscape character of Oldham using a high, medium, low classification. The landscape overview identified 36 'high' landscape value mills, 21 medium landscape value mills and 19 low landscape value mills.
- 20.19** Whilst high value mills are important in defining Oldham's landscape character, of greater significance is the grouping or clusters they form in the landscape. Seven mill clusters have been identified that would benefit from conservation to illustrate Oldham's past and protect the most significant feature of Oldham's landscape character. The recommended policy approach to these is set out below.
- 20.20** The mills will be categorised as high, medium and low priority based upon the assessment of their landscape and heritage value, alongside housing and employment potential considerations, in order to inform the formulation of a positive strategy to support the long term sustainability of the textile mill stock across Oldham.
- 20.21** The mills assessed as having high landscape value and heritage / townscape value are placed within the high priority category with a clear presumption against their loss or demolition. The mills identified as being of medium priority will remain important to retain and re-use, however, there will be a higher degree of flexibility in their alteration / conversion. It is likely that mills within this category will be less sensitive to alteration than those in the high category and therefore more significant interventions may be deemed acceptable, subject to being weighed in the planning balance.
- 20.22** Those mills which are assessed as having comparatively low landscape value and heritage significance will be placed within the low priority category. It is anticipated that there will be greater flexibility in how these mills could be reused or converted and such mills may also have potential for redevelopment. These sites feature mills which have very little architectural presence, where they have been altered significantly so that their heritage value is decreased and where the mills may be causing harm to the social and environmental value of the local community.
- 20.23** The following policy approach has been recommended for the different mill categories (please note at this stage the mills are not listed within each category as the mills strategy is still emerging. Similarly, the policy approach is also subject to change):

### **Recommended Mills Policy**

The non-designated mill stock forms a fundamental part of Oldham's historic environment and gives the landscape of the borough a clear distinctive character thereby contributing to local identity and sense of place. Proposals should retain those elements of the mill stock which contribute to the local identity and sense of place of Oldham and ensure they are appropriately conserved in a manner appropriate to their significance. Development proposals affecting non-designated mills will be assessed having regard to the following order of priority:

#### High Priority Mills:

The high priority mills make a clear positive contribution to local character and distinctiveness and are identified as non-designated heritage assets. There will be a clear presumption in favour of the retention of the high priority mills and all associated buildings and structures. Proposals which would remove, harm or undermine the significance of a high priority mill or its contribution to local distinctiveness and sense of place will be permitted only where the benefits of the development would outweigh the harm.

#### Medium Priority Mills

There will be a general presumption in favour of the retention of medium priority mills and associated buildings and structures. The alteration, extension or demolition of any buildings contributing to the landscape or heritage interest will require clear justification in relation to the significance and setting of the asset.

#### Low Priority Mills

The identified low priority mills are generally considerably altered and make a limited contribution to local distinctiveness and sense of place. Development proposals involving the comprehensive redevelopment of low priority mills will be supported in principle subject to compliance with other policies of the Local Plan.

#### Mill Clusters:

The clustering of particular groups of mills provide a unique character to the local landscape and give Oldham an exceptionally strong sense of place and local distinctiveness.

There will be a clear presumption in favour of the retention of the mills and all associated buildings and structures contained within the identified Mill Clusters. There will also be a general presumption against development that unacceptably detracts from important views of the identified Mill Clusters by virtue of its height, location, bulk or design.

**20.24** The emerging Mills Strategy sets out a number of other key actions and recommendations to implement the strategy, which the council will consider.

### **Mills Questions**

4. Do you agree with the policy approach to high, medium and low priority mills and mill clusters outlined above?
5. Is there alternative or further criteria you feel needs to be included?

## **Design and Public Realm**

**20.25** Oldham has a rich and varied history. From its origins as a small village to the centre of the Cotton Mill industry, Oldham has a significant and rich built heritage, which should inform new development. As part of the new Local Plan and in accordance with the recommendations of the 2019 Building Better, Building Beautiful Commission (BBBBC), there is a need to understand local identity, character and distinctiveness to prevent the erosion of a sense of place. Every new development in Oldham going forward should be somewhere, rather than 'anywhere'. The importance of design quality in all developments is especially important as the council embarks upon the Creating a Better Place agenda.

## **Public Realm**

**20.26** The public realm includes all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces.

**20.27** The quality of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, the public realm, and the buildings that frame it, should be attractive, accessible, designed for people and ease of movement. Higher levels of comfort should be sought in places where people will wish to sit, play, relax, meet, and dwell outside compared to other parts of the public realm that are primarily used for movement. As Oldham's population grows, the demands on Oldham's public realm to accommodate a greater variety and intensity of uses will increase.

## **Local Design Codes**

**20.28** Local planning authorities are encouraged to produce Local Design Codes in accordance with the principles established in the National Design Guide (NDG) and the guidance of how to produce them and what to consider, contained within the National Model Design Code (NMDC) and its accompanying Guidance Notes.

**20.29** Design codes improve design quality, tying down 'must have' design parameters; ensure consistency (and where appropriate differentiation) in the delivery of key site-wide design principles; offer greater certainty about outcomes and certainty to developers about the process; and bring key stakeholders together early in the process leading to smoother working relationships and to a better understanding of expectations and constraints from the start. On the question of speed, design codes can speed up the reserved matters applications associated with successive phases of large development projects.

**20.30** A Local Design Code is expected to be co-produced with the local community, in order to produce 'provably popular' design expectations, in the hope that this will reduce the amount of objections to new development. The council will consult in due course about the production of a Local Design Code - provisionally entitled 'The Oldham Code', which will deal with all aspects of placemaking.

### **Ensuring Design Quality**

**20.31** There are also several standards in relation to design quality, such as Building for a Healthy Life (BHL) and Home Quality Mark and opportunities for how these can be applied will need to be considered when preparing the Local Plan. It will be important to ensure that where appropriate the policies in the Local Plan reflect the latest standards and codes in relation to design principles and standards. The Draft GMSF 2020, through Policy GM-H3 Type, Size and Design of New Housing, requires all new homes in Greater Manchester to 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 this impracticable.

**20.32** Additionally, the council is able to specify a requirement for higher water efficiency in new properties. Whilst this is primarily aimed at areas of high water stress, given the likely impacts of climate change, the council is keen to ensure that new properties are future proofed and do not impact unnecessarily on water levels in the area.

**20.33** Building for a Healthy Life is a well established design tool that has been jointly developed between NHS England, Home Builders Federation, Design for Homes and the Design Council. It is the latest iteration of what was Building for Life 12 and before that Building for Life 20. Many housebuilders already use the tool to make an assessment of submitted schemes as part of the Design & Access Statement. In order to embed the tool within the department and its use in assessing submitted schemes, the council is keen to understand whether requiring its use for all major schemes and setting a threshold for major development, would be useful in the replacement Local Plan.

### **Design Review**

**20.34** It is also noted that in some recently adopted plans, there have been policies which expect mandatory design reviews, and/or the submission of design codes on sites which deliver above a certain threshold of development. Design Review is a well-established way of improving the quality of design outcomes in the built environment, and it is recognised in the National Planning Policy Framework.

**20.35** Design Review is an independent and impartial evaluation process in which a panel of experts on the built environment assess the design of a proposal. The projects that Design Review deals with are usually of public significance, and the process is designed to improve the quality of buildings and places for the benefit of the public.

**20.36** When it is done well, Design Review is highly efficient, and it often saves time and money. The cost of the service is never more than a small proportion of the total development budget, and is massively outweighed by the value it adds. The process adds a layer of expertise that builds on the skills of the design team and the pre-application advice provided by the local authority. Design Review:

- can bring a greater breadth and depth of experience than is available within the project team or planning authority.
- offers expert views that take account of a wide range of complex issues, and so helps to achieve sustainable development.
- looks at schemes in context, and can challenge the design brief or the assumptions that lie behind the project.
- gives planners, developers and their design teams confidence that they have had the best possible independent advice on design quality.
- supports and encourages good design and innovative proposals.
- identifies weak and inappropriate schemes at an early stage, when radical changes can be made with a minimum of wasted time and effort.
- offers opportunities for continued learning, particularly about how to assess design quality, to the people observing the review process.

**20.37** Given the benefits that design review and design codes bring to improving design quality the council are keen to hear people's opinion on whether such measures should be introduced here in Oldham.

## **Inclusive Design**

**20.38** The built environment includes the internal and external parts of buildings, as well as the spaces in between them. Despite recent progress in building a more accessible borough and city region, too many people in Oldham still experience barriers to living independent lives, due to the way the built environment has been designed and constructed or how it is managed. An inclusive design approach helps to ensure the diverse needs of all people in Oldham are integrated into proposals from the outset. This is essential to ensuring that the built environment is safe, accessible and convenient, and enables everyone to access the opportunities Oldham has to offer.

**20.39** Inclusive design is indivisible from good design. It is therefore essential to consider inclusive design and the development's contribution to the creation of inclusive neighbourhoods at the earliest possible stage in the development process - from initial conception through to completion and, where relevant, the occupation and on-going management and maintenance of the development.

**20.40** The social factors that influence inclusion have a direct impact on wellbeing and are an important component in achieving more inclusive communities. Many factors that influence potential barriers to inclusion can be mitigated by ensuring the involvement of local communities in the planning policies and decisions that will affect them.

**20.41** Inclusive design creates spaces and places that can facilitate social integration, enabling people to lead more interconnected lives. It considers things such as:

- Ensuring development proposals help to create inclusive neighbourhoods that together form a network in which people can live and work in a safe, healthy, supportive and inclusive environment;
- Linkages to the wider neighbourhood, including networks of legible, safe and navigable pedestrian routes, dropped kerbs and crossing points with associated tactile paving;
- The design and positioning of external security measures so as not to adversely impact access and inclusion;

- Ensuring that entrances into buildings are easily identifiable and allow everyone to use them independently without additional effort, separation or special treatment; and
- Creating buildings which meet the needs of the existing and future population.

**20.42** When dealing with historic buildings and heritage assets, careful consideration should be given to inclusive design at an early stage. This is essential to securing successful schemes that will enable as many people as possible to access and enjoy the historic environment now and in the future.

### **Local Design Code Questions**

6. Should the council prioritise the production a Local Design Code in order to better reflect local distinctiveness in the design of new developments?
7. What do you think are the special characteristics of your local community in terms of design that make it distinctive from other parts of Oldham? The council would welcome the submission of visual aids in this respect.
8. How do you think the design of new development should reflect the distinctiveness of your local community?
9. What other issues do you think the Local Design Code should address outside of the guidance contained within the National Model Design Code and Guidance Notes?

### **Design Questions**

10. What detailed design policies would you like to see? For example, residential design policies specifying distances between habitable space, policies on bin and bike storage, design policies for electric vehicle charging points.
11. Should there be a separate policy on 'inclusive' design, or should it be covered by a more general design policy?
12. Should the council introduce a policy that includes the requirement for applications over a certain threshold to be the subject of a Design Review? If yes, what should the threshold be?
13. Should the council introduce a policy that for residential developments over a certain threshold, a design code should be submitted with them? If yes, what should the threshold be:
  - 100 homes plus
  - 150 homes plus
  - 200 homes plus
14. Should the council ensure the use of Building for a Healthy Life and if so, should it specify a target such as ensuring 12 "Greens" under Building for a Healthy Life (BHL) for all new residential led development?



## 21 Transport and Improving Connectivity

- 21.1** Transport for Greater Manchester (TfGM) has been working with GMCA, the ten Greater Manchester councils and the Greater Manchester Mayor to prepare new, and updated, transport strategy documents that cover the entire city-region. This work includes a refreshed version of the long-term, statutory local transport plan - the Greater Manchester Transport Strategy 2040 - and a final version of Our Five-Year Delivery Plan (2020-2025) which sets out the practical actions planned to deliver the Strategy over the next 5 years. In addition, ten new Local Implementation Plans (LIP) have also been prepared (one for each Greater Manchester council), including Oldham.
- 21.2** The refreshed 2040 Transport Strategy includes reference to: the “Right-Mix” ambition for at least 50% of all journeys to be made by active travel and public transport by 2040; details of the Greater Manchester Mayor’s ‘Our Network’ plan to create an integrated, modern and accessible transport network; an increased emphasis on the importance of cycling and walking; the climate emergency declared by GMCA and all ten councils; and the development of the Greater Manchester Clean Air Plan.
- 21.3** The document has also been updated to reflect the contemporary devolution agenda; ongoing work to develop 2040 sub-strategies including: Streets for All, City Centre Transport Strategy, Local Bus Strategy, Rapid Transit Strategy, Freight Strategy; and further development of Places for Everyone, including the growing emphasis placed on regenerating town centres.
- 21.4** TfGMs Five-Year Delivery Plan sets out the practical actions planned, over the next 5 years, to deliver the 2040 Transport Strategy and achieve the transport ambitions of the GMCA and the Mayor, in parallel with the development of Places for Everyone. The Delivery Plan includes a mapped summary of proposed place-specific schemes as well as a range of Greater Manchester-wide interventions ranging from Emergency Active Travel measures to support social distancing as part of the Covid-19 recovery, to a Greater Manchester-wide reformed bus network and associated infrastructure, Clean Air Plan, and integrated fares and ticketing standards. Our Five-Year Delivery Plan supports the implementation of ‘Our Network’, a ten-year plan to create an integrated, modern and accessible transport network for Greater Manchester. It brings together different modes of public transport - bus, tram, rail, tram-train - and cycling and walking, in an integrated, easy-to-use system with seamless connections, and simplified ticketing and fares. The Delivery Plan document also provides updates on Clean Air Plan proposals; Streets for All scheme delivery; the Bee Network and measures to support bus and rail reform.
- 21.5** The Five-Year Delivery Plan is supported by ten Local Implementation Plans (LIPs) covering the period 2021 to 2026. Each of the ten councils that make up Greater Manchester has its own LIP, including Oldham. Oldham’s LIP is a ‘live’ document that can be updated as appropriate to reflect changing priorities. It includes details of local delivery priorities for the next five years, which include place-specific schemes as well as a range of boroughwide programmes or initiatives with multiple locations or where locations are yet to be determined, ranging from Bikeability cycle training, to minor traffic management works, to congestion hotspot measures, bus stop enhancements and maintenance.

- 21.6** In addition to the work at a Greater Manchester level, the council is also currently preparing a Transport Strategy for the borough, which will set out the council's ambitions and priorities for transport in the future. As the Local Plan progresses the priorities of the above transport strategy documents will be reflected in the policies that are formulated.

### **Access to Services**

- 21.7** There is a need to ensure that developments are in accessible locations and that jobs and opportunities in the wider city region are accessible to our residents by a public transport network that is reliable, efficient and cost effective. The current Local Plan has criteria aimed at ensuring development is located in the most sustainable locations. Policy 3 'An Address of Choice' states that major residential development (10 dwellings or more or a site of 0.4 hectares and above) should have access to at least three key services and one key service for minor development. The key services are listed as:

- Areas of employment;
- Major retail centres (such as Oldham Town Centre, the borough's other centres and large-scale foodstores);
- Local shopping parades;
- Health-related facilities and services (such as doctors surgeries and hospitals);
- Secondary schools;
- Primary schools;
- Post offices; and
- Community uses (such as libraries, theatres).

- 21.8** As part of the Local Plan review, the council is assessing the current range of key services to see if the list is sufficient, or whether it should be revised.

- 21.9** Policy 5 in the current Local Plan, 'Promoting Accessibility and Sustainable Transport Choices' states that all major developments should achieve 'High Accessibility' or 'Very High Accessibility' and that minor developments should achieve 'Low Accessibility' as a minimum. The current levels of accessibility are defined in the policy as:

- Very High Accessibility: within approximately 400 metres of a frequent bus route (route with a service or combination of services running minimum of every ten minutes daytime Monday to Saturday and running evenings and Sundays) and approximately 800 metres of a rail station or future Metrolink stop.
- High Accessibility: within approximately 400 metres of a frequent bus route or approximately 800 metres of a rail station or future Metrolink stop.
- Medium Accessibility: within approximately 400 metres of a bus route with a service, or a combination of services, running at a frequency of two per hour daytime Monday to Saturday.
- Low Accessibility: within approximately 400 metres of a bus route with a service, or a combination of services, running less frequently than the medium accessibility.

- 21.10** TfGM now have access to a tool called Greater Manchester Accessibility Levels (GMAL). GMAL are a detailed and accurate measure of the accessibility of a point to both the conventional public transport network (i.e. bus, metrolink and rail) and Greater Manchester's Local Link (flexible transport service), taking into account walk access time and service availability. The GMAL measure reflects:

- Walking time from the point-of interest to the public transport access points;
- The number of services (bus, Metrolink and Rail) available within the catchment;
- The level of service at the public transport access points - i.e. average waiting time; and
- The operating areas of Local Link (flexible transport) services.

**21.11** The accessibility index score is categorised into eight levels, 1 to 8, where level 8 represents a high level of accessibility and level 1 a low level of accessibility.

**21.12** As part of the Local Plan review, the council is assessing the current public transport accessibility criteria to determine if they are sufficient or whether they should be revised to include reference to the GMAL or another metric which would give a different indication of how accessible a site is for public transport use.

**21.13** Developments should also be designed and located in such a way so that walking, cycling and accessing them via public transport is the preferred way of getting around Oldham, rather than using the private car. To support such a move, the council would be interested in hearing people's views about introducing car free developments in areas of high transport accessibility or, as an alternative, the introduction of car clubs so that people only use a car when needed.

**21.14** Work is already underway as part of the Accessible Oldham programme of works which is bringing together various funding sources such as the Mayor Challenge Fund and Growth Deal 3, in order to make Oldham a more accessible and pedestrian friendly place by funding public realm works, which will enable ease of access by both foot and cycle.

**21.15** COVID-19 has also highlighted the importance of ensuring that people are able to use footpaths and cycleways in order to access good quality green spaces. This will mean that the design and layout of allocations will be important as well as their location. Developments will be expected to show how they incorporate the requirements of Local Transport Note (LTN) 1/20<sup>(50)</sup> which looks at cycle infrastructure design for instance, coupled with the Greater Manchester Streets for All Design Check (SADC), which was published in the Greater Manchester's Walking and Cycling Investment Plan, *Change a Region to Change a Nation*, in 2020, along with a Greater Manchester Interim Active Travel Design (GMCA adopted in March 2021). The interim guidance is intended to be replaced by the full Streets for All guidance when it is published. The council will also, where possible, support the introduction of Active Neighbourhoods. The purpose of Active Neighbourhoods is to make streets places for people rather than thoroughfares for traffic, this will entail certain streets being closed off to traffic (other than access for residents). Ideally, these will be located in areas which will improve access to greenspace for people and ensure that walking and cycling is the preferred mode of making journeys of less than 2km.

## Car Parking Standards

**21.16** Given the impact that car parking has on both layout and street design we are keen to hear opinions as to whether maximum or minimum parking standards should be applied, or whether a more refined, tailored approach should be taken, taking into account other factors, such as access to public transport and the context and character of the area in which development is proposed.

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50 <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

### Transport Accessibility Questions

1. Should the range of services listed as 'key services' in Policy 3 of the current Local Plan be revised and if so, what other key services do you recommend be listed in any replacement policy?
2. Should a revised policy on public transport accessibility be expanded in scope to take into account of datasets like GMAL?
3. If the council adopts parking standards as part of a replacement Local Plan policy - should it be:
  - a maximum standard;
  - a minimum standard; or
  - a tailored standard based on the application and the area.
4. Should Oldham introduce car free and / or car club developments in areas of high public transport accessibility? If yes, what would the threshold be for such developments (i.e. developments within centres or within 800m of a Metrolink stop)?

### Clean Air Zones

**21.17** Pollution from road traffic is a big issue and the most significant cause of poor air quality, with sections of the A62, A627, A663 and the M60 the worst affected in the borough. Oldham Town Centre is also significantly affected by poor air quality, which again, is primarily down to the high levels of car use.

**21.18** There is a need to look at how mitigation can be proposed to reduce the harm caused by poor air quality alongside the major routes in to and out of Oldham, which are subject to Air Quality Management Areas. This may take the form of green walls and/or roofs in new developments in areas of poor air quality or the creation of dedicated cycle parking in new developments. Work is on-going on the Greater Manchester Clean Air Plan which aims to tackle harmful and illegally high levels of roadside air pollution across the city-region. The Local Plan will support the recommendations of the Clean Air Plan, including the creation of Clean Air Zones where appropriate and any other mitigation measures which can be implemented via the Local Plan.

**21.19** The fundamental point, is that in order to reduce the harmful levels of Nitrogen Oxide and PM10's in the air, there has to be a drastic reduction in the number of trips made by the private car.

### 20 Minute Neighbourhood

**21.20** Reducing these harmful levels may be able to be achieved by adopting the 20 Minute Neighbourhood (sometimes referred to as a 15 minute city). The 20-minute neighbourhood is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to

use day to day – shopping, school, community and healthcare facilities, places of work, green spaces, and more. These places need to be easily accessible on foot, by cycle or by public transport – and accessible to everyone, whatever their budget or physical ability, without having to use a car.

## **Electric Vehicles**

**21.21** The Government has stated that by 2035 all vehicles will have to be electric and the sale of cars fuelled by fossil fuels will be banned. In order to build in resilience and ensure that homes and businesses are fit for the future, there is a need to ensure that the infrastructure is in place to help develop a high-quality electric vehicle charging network. The network will not only have to cover the use of the private motor vehicle, but also public transport and private freight haulage, therefore varying degrees of charging outlets will be required, from low 7kw chargers at the home, to superchargers delivering 250kw. Greater Manchester Local Authorities are producing an Electric Vehicle Charging Infrastructure Strategy in co-operation with TfGM, which is intended to be a sub-strategy of the GM2040 Strategy. The aim of the strategy is to establish a set of common standards and a standardised planning policy approach to electric vehicle infrastructure going forward.

### **20 Minute Neighbourhood Questions**

5. Should the council look to embed the 20 minute neighbourhood principles in to the Local Plan? If yes, how should these principles be established i.e. should it be a thread that runs throughout the Local Plan or should it be dealt with via a specific policy or suite of policies?

### **Electric Vehicle Questions**

6. Should there be a requirement for all new developments to provide electric vehicle (EV) charging points? Or should there be a threshold for certain sized developments to provide them?
7. If there is to be a threshold to provide EV charging points, what should the threshold be? i.e. Major development of 10 dwellings or more and/or 1,000 sq m of floorspace created? If yes, should there be a set standard, set at either: a) 3kw b) 7kw or c) 120kw

## **Streets for All**

**21.22** Streets for All presents a new approach to planning the streets of Greater Manchester. The initiative looks to create streets that better balance the movement of people and goods with the creation of more people-friendly places.

**21.23** As a holistic approach, Streets for All moves away from planning for transport modes, and towards putting people first to better shape and manage our streets. This will help us create more sustainable, healthy and resilient places across Greater Manchester; overall leading to an improved quality of life for those who live, work and visit our great city region.

**21.24** Streets for All is Greater Manchester's approach to re-thinking the role of streets in creating sustainable, healthy and resilient places. To support this new approach, Greater Manchester will be publishing a Streets for All Strategy complemented by a Streets for All Design Guide, which will support the application of this new approach across Greater Manchester. This will establish key principles for new streets based on street type and local needs, identify best practice to support scheme design, delivery and maintenance, and provide an audit tool to ensure proposals meet the needs of all people who use our streets.

#### **Streets for All Questions**

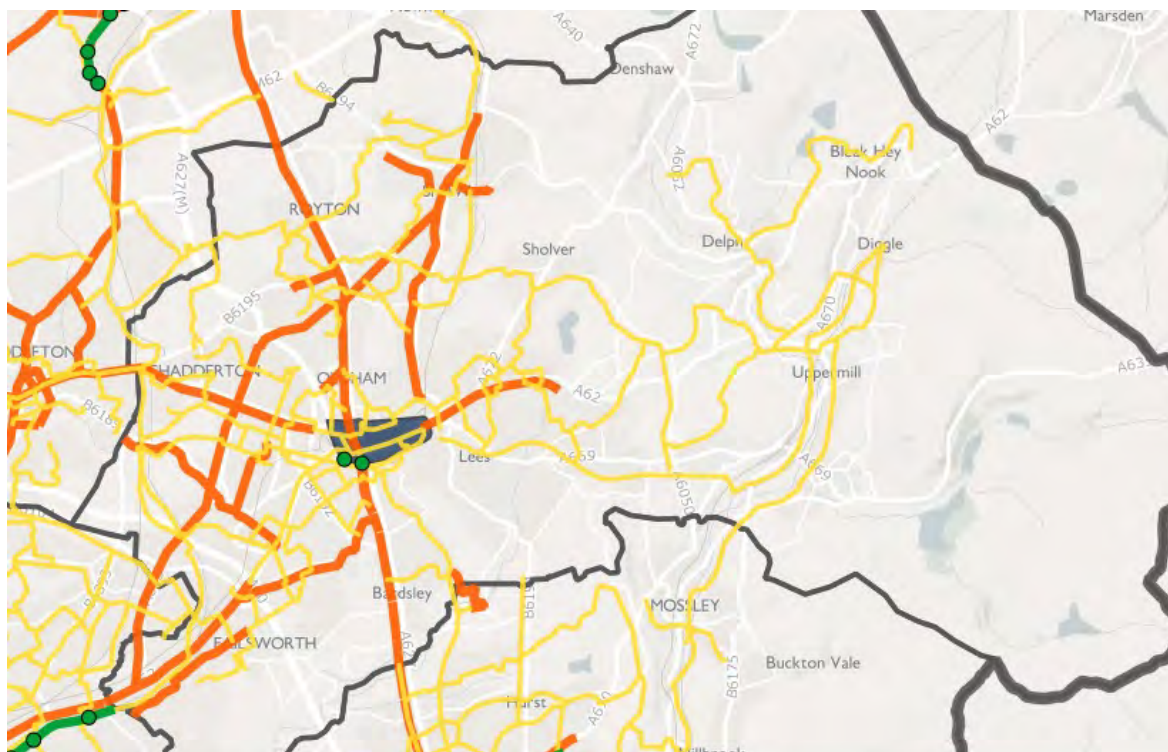
8. How should the council utilise the Streets for All guidance, should it:
  - have a standalone policy; or
  - be incorporated in to a general highway policy?
9. How should the council encourage the creation of Active Neighbourhoods? Should they be:
  - identified formally through the Local Plan process and identified on the proposals map;
  - should there be a policy which supports their creation in general; or
  - both?

#### **Bee Network**

**21.25** The Bee Network is a vision for Greater Manchester and Oldham to become the very first city region in the UK to have a fully joined up cycling and walking network; the most comprehensive in Britain covering 1,000 miles. Whereas Streets for All deals with all aspects of highway design, the Bee Network is specifically about developing a network of high quality cycling and walking routes, so that people do not have to use a car for journeys of less than 2km.



### Oldham's Bee Network



**21.26** The Bee Network sets out TfGms vision to connect every neighbourhood and community in Greater Manchester, as well as a clear strategy for effective delivery of a network that will make cycling and walking a viable choice for those that don't do so now.

**21.27** Connecting up every area and community in Greater Manchester will make it easy, safe and attractive for people to travel on foot or by bike for everyday trips and enable the two thirds of people who currently use their car, as their main mode of transport, to walk and / or cycle more. Not only will the change in journeys result in less congestion, a substantial increase in walking and cycling will also result in cleaner air for Greater Manchester as less people use their cars for journeys of less than 2km. Finally, with a significant increase in cycling and walking, there would also be significant savings on the public purse and the NHS by the reduction in weight related illnesses in Oldham as people use active modes of travel rather than using their car.

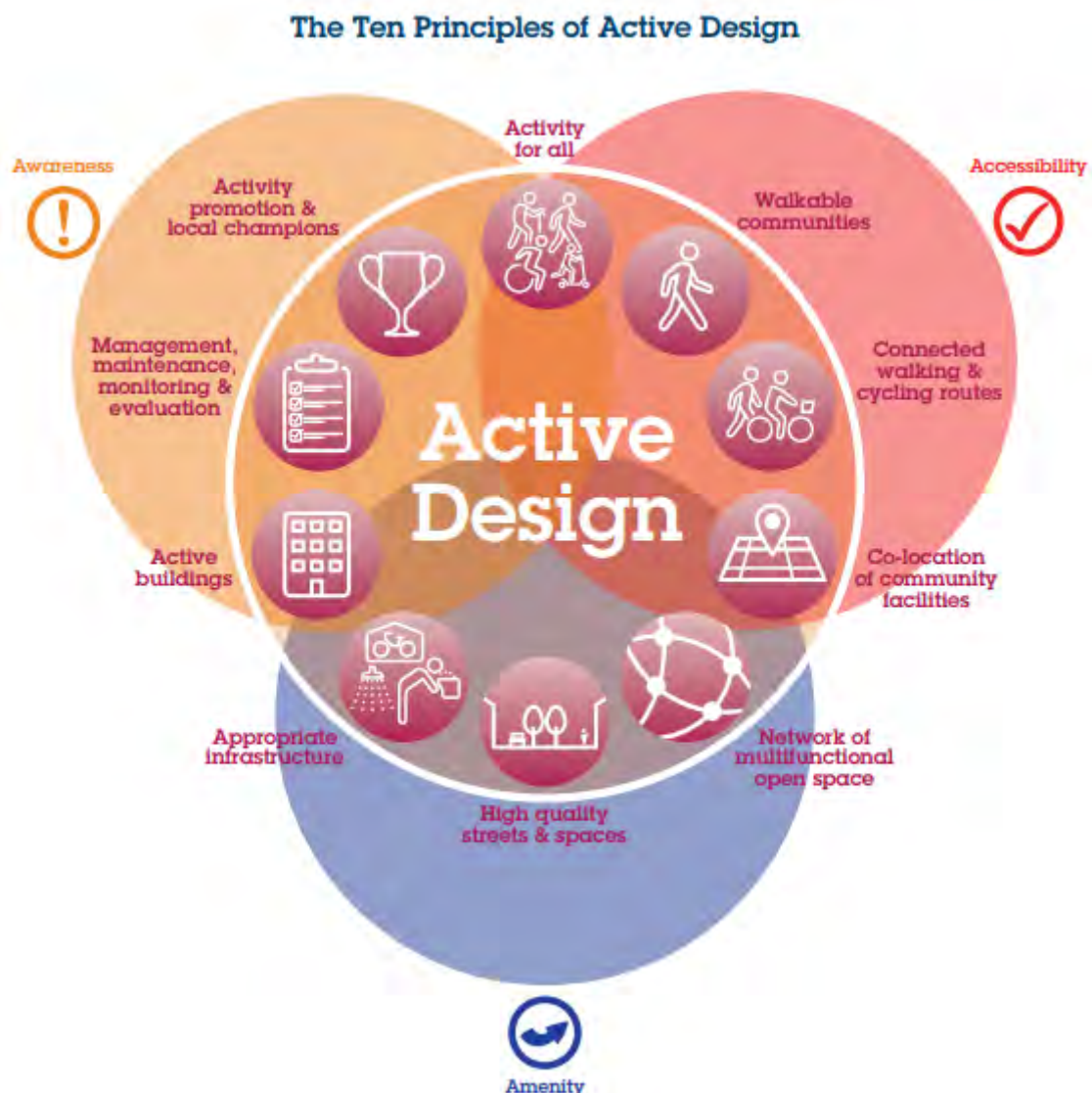
#### Bee Network Questions

10. Should Bee Network proposals be identified on the proposals map of the replacement Local Plan?
11. Should there be a policy which specifies the Bee Network and the importance that new and existing developments connect with it?



## Active Design

**21.28** Active Design is a series of principles developed by Sport England and the Town & Country Planning Association in order to ensure that people do not need to rely on the private car in order to access places and spaces around them. The focus is on how places are designed to enable active lifestyles, so it deals with aspects such as location of development, access to greenspaces layout etc. The principles are demonstrated in the graphic below from Sport England's publication, 'Active Design'.



**21.29** Whilst the principles are applicable to the plan as a whole, developments should embed the principles of Active Design to enable walking and cycling to become the preferred modes of transport. Walking and cycling infrastructure needs to be improved and integrated into new developments so that it becomes the natural choice for short journeys, this should help reduce the reliance on the car. The council will also support, where possible, the introduction of School Streets, which, much like Active Neighbourhoods, involves streets being closed to vehicles, but only at school dropping off and picking up times.

**21.30** The council is interested in exploring the idea that every new house that is completed is provided with a Greater Manchester travel pass enabling new house occupiers to use public transport free of charge or at discounted rate for a period of time set out in an agreed scheme, rather than the private car. It is noted that this kind of approach is commonplace in West Yorkshire, for instance, and the council is interested to know what level of support there is for such an approach in Oldham.

#### **Active Design Questions**

12. Should new housing developments have a requirement to provide a public transport pass, to encourage sustainable modes of transport?
13. In order to help promote cycling in the area, if all new housing developments were to be mandated to provide purpose-built cycle storage, should this be:
  - one space per bedroom;
  - two spaces per homes; or
  - one per home.
14. Should there be a standalone policy for active travel and sustainable transport modes, or should they form part of a more general transport policy?

**21.31** Policy 17 in the current Local Plan, 'Gateways and Corridors', safeguards land for the following four future transport infrastructure proposals:

- re-opening of the remaining Standedge Tunnels and development of track between Diggle and Marsden;
- proposed Diggle rail station;
- extension of the Lees New Road; and
- proposed Shaw and Crompton Park and Ride.

**21.32** The extension of the Lees New Road has formed part of a recent planning application, however construction has not yet commenced and Shaw and Crompton Park and Ride is complete. These proposals will be reviewed as part of this Local Plan Review.

## 22 Communities

**22.1** There are a number of social issues impacting neighbourhoods and groups throughout our borough, including issues such as deprivation, fuel poverty, child poverty, social isolation and loneliness in the elderly. The growing populations in minority groups and newly emerging communities in parts of the borough present particular needs, which need to be sensitively addressed.

### Health and Wellbeing

**22.2** In relation to health and wellbeing, Oldham's ageing population presents increasing health and social care needs and produces differing housing needs. There is a huge variation in life expectancy rates across the borough (by ten years between some wards), long-term health conditions are overrepresented amongst the more disadvantaged communities, and there is higher than average obesity levels in children.

**22.3** In relation to the obesity levels, rates across the borough for both children and adults are of concern. It is known that this is a particular issue for children entering primary school in reception and in year 6 upon leaving primary school where the rate can have worsened by up to double. In Oldham, the data shows that obesity in year 6 pupils is a particular issue in the more central districts of Oldham and Failsworth. Data also shows clusters of obesity where there is the highest concentration of hot food takeaways. Finally, it is known that the poor condition of a large amount of the existing housing in Oldham is a major contributory cause to poor health and wellbeing in Oldham. There is therefore a pressing need to reduce the levels of obesity and improve the health and wellbeing of children and adults of Oldham.

**22.4** Our aims in relation to our communities is to:

- create healthier and more vibrant neighbourhoods (including a mix of uses and green spaces) that are walkable and well-connected to existing communities, where infrastructure and services exist or are planned for;
- provide new or improved health, sport and recreation facilities and greenspaces to support housing and address deficits, particularly in areas of recognised need;
- protect and maintain existing cultural and arts facilities, shared services, community facilities and sport and recreational spaces unless surplus to requirements or alternative and better provisions can be provided elsewhere; and
- look to manage the impact of takeaways and fast food outlets to avoid over concentration within existing centres and direct them away from schools and areas with high levels of obesity.

### Spatial Option - Health and Wellbeing

1. Should there be a policy which restricts the location of hot food takeaways:
  - a. within 400m of a school; or
  - b. in areas with high levels of obesity; or
  - c. both?

### Health and Wellbeing Questions

2. How should the Local Plan support the creation of healthy places and spaces? Should it mandate the introduction of Health Impact Assessments? If so, should this be for:
- all developments,
  - all major residential developments or,
  - all major residential, commercial and industrial applications?

### Social Infrastructure

**22.5** Our population's health is influenced by social inequality including poverty, and worklessness. The wider determinants of health such as education, employment, housing and transport are critical factors and the quality of decisions and services can either exacerbate or help to mitigate health inequalities.

**22.6** In order to support regeneration in all our communities to tackle deprivation and promote civic pride there is a need to ensure that everyone shares in the proceeds of growth. There is a need to ensure that schools have sufficient capacity to accommodate new pupils from developments and enough places can be created to accommodate them, in the right locations. There is also a need to secure training and local employment provision (including apprenticeships and services) in association with new development to enhance the vibrancy of communities.

**22.7** The Greater Manchester Cultural Strategy highlights the importance of a diverse mix of creative and independent businesses to the vibrancy, prosperity and distinctiveness of our places. We are rightly proud of our rich cultural heritage and thriving cultural sector, from grass-roots community and heritage groups to significant cultural organisations and festivals, Oldham has a diverse and distinctive offer, of which to preserve and tell our stories, to ensure that Oldham remains exciting, forward thinking and relevant.

**22.8** The current Local Plan, in 'Policy 2, Communities' defines community facilities as:

- a. education facilities
- b. facilities associated with social service provision
- c. facilities associated with HM Prison Service
- d. health and well-being centres, health / medical centres, hospitals and nursing homes
- e. child care facilities including private nurseries
- f. indoor built facilities used for sport and recreation
- g. cultural facilities, libraries, arts centres, museums and theatres
- h. community centres, halls and social clubs used for promotion of sport and cultural activities
- i. religious buildings
- j. special needs housing involving communal living and/or supported accommodation

- 22.9** As part of the Issues and Options consultation, the council is considering the possibility of expanding the definition to include other uses such as pubs, with a question around whether or not the loss of such community facilities should be resisted wholesale, or allowed, but only when specific criteria are met. This is because community facilities provide an important function in our towns and villages, many of these community facilities have become hubs during the pandemic and have played an important role in community cohesion.
- 22.10** The council would be interested to know whether such an approach should be applied across the whole borough, regardless of location. Alternatively, the approach could be taken in settlements outside of the main centres of Oldham, Chadderton, Failsworth, Royton and Shaw. It is acknowledged that the change of use of properties such as pubs in rural locations is, in many cases permitted development, given recent changes to the Use Classes Order. Therefore, the council would also be interested to know whether Article 4 Directions should be enacted for community facilities, specifically, in the more rural locations of the borough.

## **Social Value**

- 22.11** Integrating social value into the planning system could benefit everyone involved in regeneration. For Oldham, it will lead to a better understanding of the wider benefits that arise from a development. For developers, it will allow them to focus their interventions where communities have the greatest need and value and for asset owners it will ultimately lead to higher property values as the local community grows in strength and prospers.
- 22.12** The generation of Social Value is already at the heart of the planning system which is fundamentally about the planning and regulation of land to secure the houses and workplaces a society requires, and as such, operates in the wider public good rather than that of the private individual.
- 22.13** The NPPF sets out three overarching objectives of what constitutes sustainable development, as outlined in the first chapter of this document. These objectives are completely aligned with the aims behind the Social Value Act.
- 22.14** Importantly, the NPPF notes that these three dimensions are mutually dependent. Economic growth for example can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains are to be sought jointly and simultaneously through the planning system. It is clear that Social Value runs through the heart of this. The NPPF sets out 12 'Core Planning Principles' to build on the above. One is; "Planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs." At a policy making level it is therefore clear that social value is already integrated within national guidance and that this filters through into local authority development plans through an explicit requirement for sustainable development.
- 22.15** Given the support for Social Value within the NPPF and best practice examples from elsewhere, the council is keen to hear opinions on what form a Social Value policy should take for Oldham in the Local Plan.

## Social Infrastructure Questions

### Education

3. How can planning support education provision in Oldham, should we protect some suitable sites for potential future education facilities/ services?

### Community Facilities

4. Should the definition of community facilities be expanded to include other uses, such as pubs? If so, why? Do you have any other suggestions as to what could constitute a community facility?
5. In relation to community facilities, how should the council deal with the loss of such facilities. Should it:
  - restrict them wholesale;
  - restrict them where there is no other similar facility within a certain radius; or
  - require the submission of a written statement justifying the loss of the facility and detailing the efforts to continue it's current use.
6. Should the council deal with the loss of community facilities on a borough wide basis, or focus any subsequent policy on specific locations, if yes, what locations would you suggest?
7. Should community facilities in rural locations, be subject to Article 4 Directions to limit their change of use under current permitted development rules?

### Social Value

8. Should the replacement Local Plan include a specific policy in relation to ensuring that new developments provide social value by securing training and local employment provision (including apprenticeships and services for example)?

## Local Environment

**22.16** The current Local Plan, in 'Policy 9 Local Environment' seeks to protect and improve local environmental quality and amenity by ensuring that development meets a range of criteria, such as ensuring development does not have an unacceptable impact on the environment or human health caused by air quality, odour, noise, vibration or light pollution, does not have a significant, adverse impact on the visual amenity and is not located in areas where an identified source of potential hazard exists. It also outlines how the council will promote community safety. Whilst the policy is noted for its ease of use and the fact that it covers a wide range of subjects, the council is keen to understand whether or not the various elements covered in the existing policy should be treated separately.

**22.17** As part of the Local Plan review, the council is interested to know whether the current policy is sufficient, or whether the specific criteria listed, should be separated and dealt with by their own specific policy. For instance in relation to noise, should there be a specific policy which details sources of noise and specific criteria that schemes need



to address. Such a policy could state that development should be sensitively located and designed, so as to reduce the impact of noise pollution, for instance, where residential development is located within close proximity of industrial uses.

### **Local Environment Questions**

9. Should the replacement Local Plan have separate policies dealing with:
- amenity (i.e. noise, air and odour)?
  - hazards?
  - road safety?
  - Community Safety / Secure by Design?

### **'Agent of Change' Principle**

**22.18** The 'agent of change principle' encapsulates the position that a person or business (i.e. the agent) introducing a new land use is responsible for managing the impact of that change. An example of this is residents moving into an area where unacceptable noise is coming from a long-standing music venue - this may have resulted in the Local Planning Authority (LPA) imposing additional licensing restrictions on the established licensed venue. Campaigners on behalf of licensed premises have long advocated support for the implementation of an 'agent of change' principle to place the responsibility for noise management measures on the incoming 'agent of change'.

**22.19** For developers this means that where they are proposing residential development they should consider if there could be a significant adverse effect on future occupiers of their proposed development from any nearby sources of nuisance, for example noise from pre-existing entertainment venues or employment uses. Where a potential significant adverse effect is identified, developers are likely to be required to factor into their planning application suitable mitigation measures to avoid any significant adverse impacts on health and the quality of life for future occupiers. The basic premise being that should a development be proposed that would be adversely affected by an existing use and associated noise disturbance, it is up to the developer of the proposed development, to mitigate against the impact of the existing nearby use. This is intended to prevent the council imposing restrictive licensing regimes on the long-standing uses.

### **'Agent of Change' Question**

10. Should the council introduce a policy outlining the "agent of change" principle as set out above?



## 23 Infrastructure

**23.1** Oldham will experience significant growth and change over the plan period (up to 2037) and effective infrastructure is vital to Oldham's future development. We may need to build new schools, provide more open space, improve roads, and provide more waste facilities to address our short, medium and long-term needs. The council is keen to work with utility providers so as to understand whether specific policy support is required in the replacement Local Plan to support the development of any new infrastructure required in Oldham, or whether existing policies are sufficient in this regard.

### Telecommunications

**23.2** The Government and Oldham Council are committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to be a world leader in 5G.

**23.3** The Government states that this will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage, something rural communities in particular have been calling for. A recent report found that better mobile infrastructure has the potential to transform the rural economy by enabling small businesses to grow, recruit and retain staff and making it easier for people to work from home. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

**23.4** Going forward, as part of the replacement Local Plan, there will be a need to support the roll out of 5G in Oldham, whilst protecting the character and amenity of local areas and avoiding the proliferation of masts in inappropriate locations.

**23.5** The council currently uses the saved UDP Policy D1.12 Telecommunications for the determination of applications in relation to telecommunications apparatus (this can be viewed in Appendix 14). Given that the government recently consulted on changes to the GPDO and permitted developments rights for telecommunications in order to support the roll out of the 5G network, the council is committed to reviewing the policy so that it is consistent with national policy.

#### Infrastructure Question

1. Does Oldham require a specific policy that seeks the development of supporting necessary infrastructure, or is it considered that the existing planning policy in the NPPF and Local Plan is sufficient in this regard?
2. Do you think Oldham should continue to have a policy regarding Telecommunications?

## Planning Obligations

- 23.6** Planning obligations, also known as Section 106 agreements (based on that section of The 1990 Town & Country Planning Act), are private agreements made between local authorities and developers and can be attached to a planning permission to make acceptable development which would otherwise be unacceptable in planning terms. In terms of planning obligations, currently Oldham does not have a set strategy for defining contributions in the context of a Planning Obligations Supplementary Planning Document (SPD). The contributions that are usually requested in Oldham are generally, Open Space, Affordable Housing and Highways.
- 23.7** Questions and options related to certain obligations have already been outlined in this document, for instance, it has already been asked whether there is agreement to ask for 30% affordable housing requirement, whilst open space contributions will continue to be requested, therefore it is not proposed to list additional questions in this regard here.

### Planning Obligations Questions

3. Does Oldham require a specific policy that seeks to deliver the necessary infrastructure required to support new development?; or
4. Should it be dealt with under the various areas, such as Education, Transport, Open Space etc? Please list areas where you think the council should outline specific Infrastructure requirements.
5. Following adoption of the Local Plan, should the council produce a Planning Obligations SPD, or should the policies clearly explain the methodology?

## Waste Management

- 23.8** The current Local Plan includes a policy for Waste - Policy 7 Sustainable Use of Resources - Waste Management, which links back to the Greater Manchester Waste Plan (this can be viewed in Appendix 15).
- 23.9** This policy will be carried over in the Local Plan. It will be reviewed when a new Greater Manchester Waste Plan is prepared.

## Minerals

- 23.10** The current Local Plan includes a policy for Minerals - Policy 8 Sustainable Use of Resources - Minerals which links back to the Greater Manchester Minerals Plan (this can be viewed in Appendix 16).
- 23.11** This policy will be carried over in the Local Plan. It will be reviewed when a new Greater Manchester Minerals Plan is prepared.



## 24 Monitoring

- 24.1** National Planning Policy Guidance states that 'Local planning authorities must publish information at least annually that shows progress with local plan preparation, reports any activity relating to the duty to cooperate, any information collected which relates to indicators in the plan, and any policies which are not being implemented'.
- 24.2** As part of reviewing the Local Plan, the council will identify a series of local indicators that will be monitored to ensure effective implementation of the plan. These indicators will be monitored so as to identify when a future review may be required.
- 24.3** As part of the Integrated Assessment (IA) of the Local Plan a number of proposed IA Objectives have been identified along with corresponding indicators. More information on the methodology used to identify these can be found in the Integrated Assessment of the Local Plan Review: Scoping Report Update 1. The 56 indicators identified are:
1. Single data list 160-00 Proportion of local sites where positive conservation management is being or has been implemented (IA1)
  2. Change in areas of biodiversity importance (IA1)
  3. Percentage of major developments generating overall biodiversity (IA1)
  4. Hectares of biodiversity habitat delivered through strategic sites (IA1)
  5. Extent of protected open space (IA2)
  6. Percentage of the borough's population having access to a natural greenspace within 400m of their home (IA1, IA2)
  7. Hectares of accessible open space per 1000 population (IA2)
  8. Amount of major new development with commentary on likely impact on landscape character (IA3)
  9. Number of heritage assets on the National Heritage List for England (IA4)
  10. Number of entries on the English Heritage 'Heritage at Risk Register' (IA4)
  11. Number/ extent of Conservation Areas (IA4)
  12. Number of listed buildings and number of buildings in conservation areas lost through new development proposals (IA4)
  13. Number of planning applications that have been given nine greens and above under Building for a Healthy Life (IA5)
  14. Number and type of developments permitted in the Green Belt (IA6, IA11)
  15. Number and extent of Local Green Spaces (IA1, IA2, IA3, IA4, IA6, IA8)
  16. Number and type of developments in Local Green Spaces (IA1, IA2, IA3, IA4, IA6, IA8)

17. Number and type of developments on safeguarded land (IA6);
18. Developer contributions for the delivery of infrastructure (IA7)
19. Healthy Life Expectancy (HLE) remaining at 65 (IA8)
20. Life expectancy at birth (IA8)
21. Sports and Physical Activity Levels (Adults 16+) (IA8)
22. Number of planning permissions granted contrary to Environment Agency advice on flood risk and water quality grounds (IA9, IA10, IA13)
23. Number of new developments where agreed with the council incorporating Sustainable Drainage System to ciria standard <sup>(51)</sup> (SUDS) (IA1, IA7, IA9, IA10, IA13)
24. Water Framework Directive status of all waterbodies in the borough (IA10)
25. Number of days in Greater Manchester where air pollution was moderate or higher (IA14)
26. Annual mean nitrogen dioxide (IA14)
27. Per capita emission estimates, industry, domestic and transport sectors (IA14, IA16, IA17)
28. Applications refused for reasons relating to local environmental quality (IA15)
29. Percentage of sustainable transport trips undertaken (IA16)
30. Number of travel plans secured as a condition of planning permission (IA16)
31. Access to services (IA6, IA8, IA14, IA16, IA17, IA18, IA26)
32. Installed Renewable Energy Capacity in Community Buildings (IA12, IA13)
33. Proportion of fuel poverty poor (IA12)
34. Total amount of additional floorspace (B1, B2 and B8) by type square metres (sqm) gross (IA18, IA19)
35. Total Amount of employment floorspace (gross) on previously developed land by type (IA18, IA19)
36. Employment land available by type hectares (ha) (IA18, IA19)
37. Land developed for business and industry (IA18, IA19)
38. Percentage increase in residential development in main town centres (IA20)
39. Percentage vacancy rate in main town centres (IA20)

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51 Ciria is the Construction Industry and Information Association

40. Number of new cultural and leisure facilities permitted (IA21)
41. Unemployment rate (IA18, IA19, IA26)
42. % of young people not in education, employment or training (NEET) (IA18, IA19, IA22, IA26)
43. State funded primary and school capacity and forecasts (IA7, IA22)
44. Number of education related developments started and/or completed (IA7, IA22)
45. Qualification levels (aged 16-64) (IA18, IA19, IA22, IA26)
46. Plan period and housing targets; Net additional dwellings - in previous years; Net additional dwellings - for the reporting year; Net additional dwellings - in future years; and Managed delivery target (IA23)
47. New and converted dwellings – on previously developed land (IA6, IA11, IA23)
48. Development density in schemes of 5 dwellings or more (IA6, IA23)
49. Housing completions by size and type (IA23, IA25)
50. Gross Affordable housing completions (IA23, IA25)
51. Number of Empty Homes (IA6)
52. Net additional pitches (Gypsy and Traveller) (IA23, IA25)
53. Production of primary land won aggregates by mineral planning authority (IA24)
54. Production of secondary and recycled aggregates by mineral planning authority (IA24)<sup>(52)</sup>
55. Local Authority Collected Waste (LACW) (IA25)<sup>(53)</sup>.
56. Childhood obesity rates

### Monitoring Questions

1. Do you have any views on the indicators above that have been identified?
2. Are there any other indicators that you feel should be included within the Local Plan monitoring framework?

52 Further indicators are available in the Minerals Monitoring Report.

53 Further indicators are available in the Waste Monitoring Report.





## 25 Glossary

**Accessible, Accessibility** – The terms 'accessible' and 'accessibility', as used in this document in relation to transport and other services, refer to the proximity of services and and to the ability of all sectors of the community to use that services.

**Affordable Housing** - Affordable Housing is defined in the NPPF as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a. Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent<sup>(54)</sup>, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent);
- b. Starter homes<sup>(55)</sup>: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used;
- c. Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households; and
- d. Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

**Air quality management areas** - Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

**Amenity** - desirable features of a place that ought to be protected in the public interest.

**Ancient Woodland** - An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).

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54 <https://www.gov.uk/government/publications/direction-on-the-rent-standard-from-1-april-2020>

55 \*Proposed to be replaced by 'First Homes' <https://www.gov.uk/government/consultations/first-homes>

**Biodiversity** – The variability among living organisms from all sources including, among other things, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part. This includes diversity within species, between species and ecosystems.

**Climate Change** - A change of climate, which is attributed directly or indirectly to human activity that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods.

**Community Right to Build Order** - An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site specific development proposal or classes of development.

**Comparison Retailing** - The provision of items not purchased on a frequent basis, such as clothing, footwear and household goods.

**Conservation Areas** - Areas designated by the local planning authority which are considered of special architectural or historic interest, the character of which it is desirable to preserve or enhance.

**Contaminated Land** - Defined in The Environment Protection Act Part IIA, Section 78A(2) as 'any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that:

- significant harm is being caused or there is a significant possibility of such harm being caused, or;
- pollution of controlled waters is being, or is likely to be, caused.'

**Convenience Retailing** - The provision of everyday essential items, such as food, drinks and newspapers.

**Deliverable** - As per the NPPF definition, to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

**Derelict Land** - Land damaged by industrial or other development that cannot be put to beneficial use without prior treatment.

**Design code** - A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

**Designated heritage asset** - A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

**Employment Land** - Land allocated in Development Plans for business, industrial and storage/distribution uses.

**Farm Diversification** - The development of a variety of economic activities linked to working farms, designed to support farm income and use surplus land, e.g. forestry, leisure, tourism.

**Flood Risk Assessment** - An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

**Geodiversity** - the natural range of geological features (rocks, minerals, fossils, structures), geomorphological features (landforms and processes) and soil features that make up the landscape.

**Green Belt** - Areas of land where development is particularly tightly controlled. The purposes of Green Belt are to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to aid urban regeneration by encouraging the recycling of derelict and other urban land.

**Greenfield Land** - Land which has not been previously developed. It can include land which used to have built development on it but where little development remains; land where the development on it is limited by a planning condition which requires the land to be restored to its original pre-development condition when it's useful life ends (i.e. a quarry); and land where development has been used for forestry or agriculture and that development is no longer needed for that purpose.

**Green Infrastructure** – A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

**Heritage asset** - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Historic Environment** - All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

**Housing Delivery Test (HDT)** - Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Housing Delivery Test Measurement is published annually by the Ministry of Housing, Communities and Local Government.

**Index of Multiple Deprivation (IMD)** - A ward-level index made up from six indicators (income; employment; health deprivation and disability; education; skills and training; housing; and geographical access to services). IMD can help to identify areas for regeneration.

**Infrastructure** - Services necessary to serve development, such as roads and footpaths, electricity, water, sewerage.

**Landscape Character Assessments** - A tool to identify and understand the factors that give character to the landscape and to help inform policy and decisions about how the landscape may change in the future.

**Local Housing Need** - The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 NPPF).

**Local Nature Reserves** - Sites designated under terms of the National Parks and Access to the Countryside Act 1949 and owned, leased or managed under agreement by local authorities.

**Nature Conservation** - The protection, management and promotion of wildlife habitat for the benefit of wild species, as well as the communities that use and enjoy them.

**Nature Recovery Network** - An expanding, increasingly connected, network of wildlife rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.

**Open Space** – 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.

**Peak District National Park** – As a designation was founded in 1951. The Peak District National Park Authority oversees the planning function of the Park. The statutory purposes of the Authority (as defined by the Environment Act 1995) are:

- to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park;
- to promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

The National Park also has valued characteristics which include quiet enjoyment; wilderness and remoteness; landscape, wildlife and plants; clean earth, air and water; it's cultural heritage or history, archaeology, customs and literary associations; other features which make up its special quality.

**Planning Obligation** – An agreement made between the council and another party that concerns a particular aspect of, or is associated with, a development. It is usually made in connection with the granting of planning permission through Section 106 of the Town and Country Planning Act 1990.

**Previously Developed Land (often referred to as brownfield land)** - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

**Proposals Map** – A map with an Ordnance Survey base that illustrates the policies and proposals of a Development Plan Document.

**Regionally Important Geological/Geomorphological Sites (RIGS)** - Non-statutory sites recognised by Natural England and local authorities as of regional importance.

**Renewable and low-carbon energy** - Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

**Self-build and custom-build housing** - Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

**Sites of Biological Importance (SBI's)** – Areas recognised by the council as being of particular interest by reason of any flora, fauna, geological or landscape features which require protection and preservation.

**Sites of Special Scientific Interest (SSSI's)** – Sites designated by Natural England under the Wildlife and Countryside Act 1981.

**Special Areas of Conservation** - Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

**Special Protection Areas** - Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

**Strategic environmental assessment** - A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

**Strategic Housing Land Availability Assessment (SHLAA)** - Assessments carried out by local authorities which support the delivery of sufficient land for housing to meet the community's need for more homes. These assessments are required by national planning policy.

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**Supplementary Planning Document (SPD)** – Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

**Sustainable development** – Defined by the Bruntland Commission (1987) as “Development which meets present needs without compromising the ability of future generations to achieve their own needs and aspirations”.

**Sustainable Drainage Systems (SuDS)** - A range of techniques used to control surface water run-off as close as possible to its origin before it enters a watercourse. They are designed to improve the rate and manner of absorption by water of hard and soft surfaces, in order to reduce the total amount, flow and rate of surface water that runs directly to rivers through stormwater systems.

**Travel Plan** - A Travel Plan is a document that lays out the strategy for managing travel to and from a site and improving accessibility, particularly by sustainable modes, to reduce the impact of a site on the surrounding road network and to manage the use of local car parking capacity.