

Oldham

Local Plan

**Local Plan Review: Draft Local Plan Integrated
Assessment Non-Technical Summary**

December 2023



Oldham
Council

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Introduction

- 1.1 This is a non-technical summary of the Integrated Assessment (IA) that has been prepared for the Local Plan review: Draft Plan.
- 1.2 The IA includes the following:
 - a Sustainability Appraisal (SA), incorporating the requirements of Strategic Environmental Assessment (SEA);
 - a Habitat Regulations Assessment (HRA)
 - an Equalities Impact Assessment (EIA); and
 - a Health Impact Assessment (HIA).

The Purpose of Integrated Assessment

- 2.1 The purpose of the IA is to assess the environmental, social and economic performance of the local plan. The assessment is an iterative process that is carried out as the Local Plan progress. This is a Non-Technical Summary of the IA of the Draft Local Plan.
- 2.2 The Oldham Local Plan will apply to the whole borough, except for that part of the borough that is the planning responsibility of the Peak District National Park Authority.

Sustainability Appraisal and Strategic Environmental Assessment

- 2.3 The role of a SA is to promote sustainable development through assessing the emerging Local Plan against economic, environmental and social objectives. Significant adverse effects should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.
- 2.4 The Planning and Compulsory Purchase Act (2004) requires the council to carry out a SA of each of the proposals in a Local Plan and to prepare a Local Plan with the objective of contributing to the achievement of sustainable development. The council is also required, under European Directive 2001/42/EC (the Strategic Environmental Assessment Directive) and The Environmental Assessment of Plans and Programmes Regulations 2004, to carry out an environmental assessment.
- 2.5 In recognition of the linkages across the various assessments (that is the SA / SEA, HRA, EIA and HIA) these have been brought into a single 'Integrated Assessment' report. Each element of the IA is explained below.

The Integrated Assessment Process

- 3.1 The stages of the IA are set out in Figure 1 below.

Figure 1: Stages of the Integrated Assessment Process

DPD: Evidence gathering and engagement

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- Identify other relevant policies, plans and programmes, and sustainability objectives
- Collect baseline information
- Identify sustainability issues and problems
- Develop the IA framework
- Consult the consultation bodies on the scope of the IA report

DPD: Production and consultation

IA Stages and tasks

Stage B: Developing and refining options and assessing effects

- Test the DPD objectives against the IA framework
- Develop the DPD options including reasonable alternatives
- Evaluate the likely effects of the DPD and alternatives
- Consider ways of mitigating adverse effects and maximising beneficial effects
- Propose measures to monitor the significant effects of implementing the DPD

Stage C: Preparing the IA Report and the publication version of the DPD

Stage D: Seek representations on the IA report and the publication DPD from consultation bodies and the public.

Submit draft DPD and supporting documents for independent examination

Outcome of examination / Consider implications for SA/SEA compliance

Local Plan adopted

Stage E: Post adoption reporting and monitoring

- **Prepare and publish post adoption statement**
- **Monitor significant effects of implementing the Local Plan**
- **Respond to adverse effects**

Findings of the Integrated Assessment

Stage A

- 4.1 The Scoping Report is Stage A. It includes a section on each of the following:
- Relevant policies, plans and programmes, and sustainability objectives;
 - Baseline information;
 - Sustainability issues and problems;
 - The IA framework; and
 - How the prescribed consultation bodies have been consulted on, and fed into, the scope of the IA report.
- 4.2 A summary of the key issues and environmental, social and economic problems identified through the Scoping Report Update 2 are set out in Table 1 below. These have been identified through Stage 1 'Identify other relevant policies, plans and programmes, and sustainability objectives' and Stage A2 'Collect baseline information' documented in Appendix 1 and 2 of the IA. The

Table 1: Summary of key issues and environmental, social and economic problems

Biodiversity / Fauna / Flora / Soil
There is a need to: <ul style="list-style-type: none"> • protect and enhance biodiversity, geodiversity and ecological networks and a multi-functional green infrastructure network • protect and enhance soils and remediate contaminated land
Landscapes (including Townscapes and Design)
There is a need to: <ul style="list-style-type: none"> • ensure that development makes a positive contribution to landscape and townscapes, local distinctiveness and sense of place • ensure land and buildings are used in an effective and efficient manner, maximising the use of brownfield land • promote high-quality, beautiful design through establishing local design expectations
Cultural Heritage (including Historic Environment)
There is a need to: <ul style="list-style-type: none"> • protect, conserve and enhance the historic environment, including their wider settings and to preserve and conserve archaeological heritage
Population
There is a need to ensure the needs of the future population are met through: <ul style="list-style-type: none"> • a sustainable housing land supply and an appropriate mix of sizes, types and tenures to meet local housing needs • an appropriate provision of supporting infrastructure to meet development needs • promoting inclusive sustainable communities and community cohesion <p>There is also a need to:</p> <ul style="list-style-type: none"> • improve education and skills attainment • promote economic growth • enhance the vitality and viability of the borough's centres • promote sustainable tourism and recreation

Human Health
There is a need to: <ul style="list-style-type: none"> • improve health and well-being and reduce health inequalities across the borough • promote quality and accessible open spaces • protect and improve local environmental quality
Water
There is a need to: <ul style="list-style-type: none"> • avoid and mitigate against flood risk • sustainably manage water resources and protect and enhance water quality • adapt and be resilient to climate change
Air / Climatic Factors
There is a need to: <ul style="list-style-type: none"> • continue improving air quality • reduce energy use, promote energy efficiency, and promote renewable and low carbon energy • promote access to key services to reduce the need to travel • encourage walking and cycling • promote a sustainable low emission, integrated, efficient transport system that supports growth in the borough
Material Assets
There is a need to: <ul style="list-style-type: none"> • promote sustainable waste management through the waste hierarchy • manage minerals sustainably

4.3 The issues and problems listed in Table 2 above have then been translated into the proposed IA Objectives. These are accompanied by corresponding indicators so that the issues and problems can be assessed and monitored. The proposed IA Objectives are set out in Table 2 below:

Table 2: Proposed IA Objectives

1	To protect, conserve and enhance a high-quality multifunctional green infrastructure network, including biodiversity and geodiversity, that is ecologically connected.
2	To promote quality and accessible open spaces.
3	To protect and enhance the character and appearance of landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.
4	To protect, conserve and enhance the historic environment, heritage assets and their setting.
5	To promote high-quality, beautiful design that meets local design expectations.
6	To ensure land and buildings are used in an effective and efficient manner, maximising the use of brownfield land.
7	To ensure appropriate provision of supporting infrastructure to meet development needs.
8	To improve health and well-being and reduce health inequalities.
9	To minimise and mitigate against flood risk and adapt to the effects of flood risk.
10	To protect and improve the quality of water bodies and river corridors and availability of water resources.
11	To protect and improve soil quality, best and most versatile agricultural land, and remediate contaminated land.
12	To minimise energy use, promote energy efficiency and the use of renewable and low carbon energy.

13	To ensure communities and infrastructure are resilient to the effects of climate change.
14	To protect and improve air quality.
15	To protect and improve local environmental quality.
16	To promote an integrated and improved transport system that provides sustainable transport choices and improves connectivity, including the walking and cycling network and the protection and enhancement of the PROW Network.
17	To promote accessibility to key services and reduce the need to travel.
18	To promote regeneration and reduce levels of deprivation and disparity.
19	To promote sustainable economic growth and job creation.
20	To protect and enhance the vitality and viability of Oldham Town Centre and the centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill.
21	To promote sustainable tourism and leisure.
22	To improve education attainment and skill levels.
23	To provide a sustainable housing land supply and an appropriate mix of sizes, types and tenures to meet local housing needs.
24	To ensure the prudent use and sustainable management of minerals.
25	To manage waste sustainably in line with the waste hierarchy.
26	To promote mixed, balanced and inclusive sustainable communities.

- 4.4 To enable monitoring of these proposed IA Objectives a set of IA Monitoring Indicators have been proposed. These can be found in Section 16 of the IA Scoping Report Update 2.

Stage B

- 4.5 As illustrated in Figure 1 above, Stage B of the IA process is where the options are developed and refined, and their effects are assessed. Details of Stage B at both Issues and Options and Draft Plan stage is provided below.

Issues and Options

- 4.6 A summary of the IA appraisal carried out at the Issues and Option stage can be found in Section 6 of the IA Report.
- 4.7 At Issues and Options stage, several spatial options were assessed including reasonable alternatives. The likely effects of each of these options / alternatives were considered and any mitigation / enhancements to maximise beneficial effects identified. Table 3 below provides a summary of the options, the outcome of the IA process and how the options have informed the preferred approach.

Table 3: Summary of IA Appraisal of Spatial Options

Spatial Option	Appraisal Summary	How this has informed the Draft Local Plan policy
AFFORDABLE HOMES		
<p>A: Should an affordable housing requirement be applied borough-wide?</p> <p>B: Should there be a different affordable housing requirement for different parts of the borough, depending on their need?</p>	<p>Option B (targeted approach to affordable housing) results in more positive outcomes overall than Option A (boroughwide approach).</p>	<p>The preferred approach is outlined in the Draft Local Plan in Policy H7 Affordable Housing.</p> <p>Option B scored higher in the Issues and Options IA and this option has been taken forward as the preferred approach.</p> <p>The policy has set out three zones which reflect different value areas. Within each of these value areas different affordable housing requirements are required.</p> <p>Option A has not been taken forward as this does not lead to as many positive impacts as Option B.</p> <p>In the IA of the Draft Local Plan this proposed policy has scored neutral, positives and significantly positives scores.</p>
HOMES IN MULTIPLE OCCUPATION		
<p>A: 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?</p> <p>B: 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 boroughwide?</p>	<p>The IA appraisal for Homes in Multiple Occupation (HMO) Spatial Options A and B both scored the same.</p>	<p>The approach to HMOs is outlined in the Draft Local Plan Policy H10 Houses in Multiple Occupation.</p> <p>The IA did not indicate a stronger performing option.</p> <p>The draft policy sets out criteria for Houses in Multiple Occupation (HMOs) to meet. In addition, permission will not be granted where the proportion of HMOs result in them representing 10% or more of residential properties within a 50m radius measured from the centre of the application site. This boroughwide approach would reflect Spatial Option B.</p>

Spatial Option	Appraisal Summary	How this has informed the Draft Local Plan policy
		<p>There is further policy stated for Oldham Town Centre, which recognises that HMOs are best suited to locations that are well-connected to services, facilities and public transport.</p> <p>However specifically in relation to Article 4 Directions as per the options the supporting text to the policy indicates that a Direction may be sought for Oldham Town Centre or other specific parts of the borough. However, as the policy has not introduced an Article 4 Direction at this point in time, considering evidence, neither option has, at this point, been taken forward.</p> <p>The IA on the preferred option – the draft plan policy scored a mixture of neutral, positive and significantly positive scores.</p>
HOUSING ALLOCATIONS		
<p>A: Should Oldham focus the identification of housing allocations within the urban area – in Oldham Town Centre, the borough’s other centres, key public transport corridors, on previously developed land, vacant and under-utilised buildings (including the re-use of employment sites and mills, where appropriate)?</p> <p>B: Should Oldham focus the identification of housing allocations within the urban area as in Option A, but also include within the scope open spaces (where identified as surplus to requirements through the council's open space study), land currently designated as Other Protected Open Land where it does not meet LGS criteria, and previously developed land in the Green Belt where this meets national planning policy.</p>	<p>The IA of the housing allocation spatial options shows at this stage generally there are more uncertainties around Option B (brownfield / urban area plus greenfield) than Option A (brownfield / urban area), which would need to be further appraised and mitigated where required, if this option was selected.</p>	<p>Option B has been taken forward. It incorporates option A and makes the most of sites in the urban areas, whilst ensuring that we are identifying a sufficient variety of sites through the inclusion of some greenfield sites where appropriate. Nevertheless, the majority of development that will come forward will be within the urban area and the release of open land would be the exception.</p> <p>If a greenfield site is identified within a council regeneration programme (e.g. the council’s Residential Delivery Strategy) it has been considered, as deliverability is indicated by this work. In addition, some sites which are mixed (that is where they include greenfield and brownfield land) have also been considered. Previously developed land within the Green Belt is also considered where appropriate. Some of these sites may already benefit from an extant planning permission.</p> <p>The approach of Option B is reflected in the potential housing allocations proposed in Draft Local Plan Policy H1 – Housing and</p>

Spatial Option	Appraisal Summary	How this has informed the Draft Local Plan policy
		<p>Mixed-Use Allocations. The focus of the potential allocations is on brownfield land, particularly opportunities within Oldham Town Centre. Whilst recognising that it is important to identify a range of allocations across the borough that reflect the council's priorities and provide the opportunity to address local housing need through offering a range of scale, location and mix.</p> <p>Option A was therefore not solely taken forward as it would not in itself provide the same range of allocations.</p>
EMPLOYMENT ALLOCATIONS		
<p>A: To focus more on the connectivity to our existing employment sites and neighbouring districts key employment sites.</p> <p>B: A combination of providing some new employment land and improving connectivity to existing and neighbouring districts key employment sites.</p>	<p>The IA of the employment allocation options shows that at this stage there are more uncertainties with Option B (new employment land improving employment connectivity to existing employment sites), which if taken forward as an option would need further assessment and mitigation if required in comparison to Option A (improve connectivity to existing employment sites). The spatial options were enhanced by making reference to sustainable connectivity.</p>	<p>Option B has been taken forward. It incorporates Option A and it is considered important that our residents have access to job opportunities within the borough, while also having improved connectivity to existing and neighbouring districts key employment sites. This option maximises the job opportunities available to our residents.</p>
HEALTH AND WELLBEING		
<p>A: Should there be a policy which restricts the location of hot food takeaways within 400m of a school?</p>	<p>Option A, B and C scored neutral against most IA objectives. However,</p>	<p>The preferred approach is outlined in the Draft Local Plan Policy CO8 Hot Food Takeaways.</p>

Spatial Option	Appraisal Summary	How this has informed the Draft Local Plan policy
<p>B: Should there be a policy which restricts the location of hot food takeaways in areas with high levels of obesity?</p> <p>C: Should there be a policy which restricts the location of hot food takeaways within 400m of a school and in areas with high levels of obesity?</p>	<p>Option B and C scored a significantly positive impact against the IA objective 'To improve health and well-being and reduce health inequalities'. Option C scored significantly positive against a further two IA objectives relating to local environmental quality and centres and therefore higher overall.</p>	<p>The policy sets out the parameters for approving hot food takeaways. Outside of centres within 400m of the principal entry point to a secondary school or sixth form college hot food takeaways will only be granted where they would not result in a proliferation of said uses.</p> <p>(Primary Schools have not been selected as this would include the majority of the borough and children at primary school are less likely themselves to visit independently).</p> <p>The policy also requires that applications for hot-food takeaways must be supported by a Health Impact Assessment (HIA). Where an unacceptable adverse impact on health is established, planning permission will not be granted.</p> <p>Therefore, looking at the reasonable alternatives Option A has been incorporated. Consideration of obesity has also been incorporated as part of Options B and C but in the form of requiring a HIA, rather than a blanket restriction in areas of high obesity.</p> <p>As such, it is considered that a hybrid of options, including the highest scoring option as the HIA should consider factors such as obesity / deprivation, has been incorporated as the preferred option.</p> <p>The IA undertaken on this preferred approach has scored a mixture of neutrals, positives and a significantly positive score in relation to improving health and well being.</p>

Draft Plan

- 4.8 The remainder of this Non-Technical Summary provides details of the IA appraisal accrued out on the Draft Plan.
- 4.9 This stage appraised the vision, plan objectives, draft policies and site allocations in the Draft Plan stage of the Local Plan review. A summary of the findings is set out in Tables 4, 5 and 6 below, where details of scoring can be found as well as any adverse and beneficial effects that may need to be mitigated or maximised. Full details can be found in Section 7 of the Integrated Assessment.

Table 4: Summary of the appraisal of the Oldham Draft Local Plan Vision and Plan Objectives

Part of Draft Local Plan assessed	Scoring	Adverse effects	Beneficial effects
Vision	The vision scored a mixture of neutral, positives and significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to the vision. The vision scored positively / significantly positive against 24 IA objectives where it would have a beneficial impact.
PO1 Building quality homes to meet local needs and diversify the housing offer	PO1 scored a mixture of neutral, positives and significantly positive scores. There were 17 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 1. The plan objective scored positively / significantly positive against 17 IA objectives where it would have a beneficial impact.
PO2 Providing opportunities to learn and gain new skills	PO2 scored a mixture of neutral, positives and significantly positive scores. There were 18 neutral scored and 8 positive or significantly positive.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	The plan objective scored positively / significantly positive against 8 IA objectives where it would have a beneficial impact. The objective scored a lot of neutrals given its specific nature. The plan objective was enhanced as a result of the IA process in relation to IA6 on the efficient use of land. This was to clarify that the plan objective applies to existing facilities and not just new facilities. Wording was amended from 'new sites' to 'suitable sites'.
PO3 Boosting northern competitiveness by providing access to employment opportunities and growing local businesses	PO3 scored a mixture of neutral, positives and significantly positive scores. There were 13 neutral scored and 13 positive or significantly positive.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 3. The plan objective scored positively / significantly positive against 13 IA objectives where it would have a beneficial impact.
PO4 Supporting the regeneration of Oldham Town	PO4 scored a mixture of neutral, positives and significantly	No adverse effects were identified therefore no changes	No enhancements were identified to plan objective 4. The plan

Part of Draft Local Plan assessed	Scoring	Adverse effects	Beneficial effects
Centre and creating thriving centres	positive scores. There were 3 neutral scored and 23 positive or significantly positive.	were required to mitigate adverse effects	objective scored positively / significantly positive against 23 IA objectives where it would have a beneficial impact.
PO5 Protecting and enhancing Oldham's landscapes	PO5 scored a mixture of neutral, positives and significantly positive scores. There were 7 neutral scored and 19 positive or significantly positive.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 5. The plan objective scored positively / significantly positive against 19 IA objectives where it would have a beneficial impact.
PO6 Protecting, restoring and enhancing the natural environment	PO6 scored a mixture of neutral, positives and significantly positive scores. There were 3 neutral scored and 23 positive or significantly positive.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 6. The plan objective scored positively / significantly positive against 23 IA objectives where it would have a beneficial impact.
PO7 Promoting sustainable development that mitigates and adapts to climate change	PO7 scored a mixture of neutral, positives and significantly positive scores. There were 9 neutral scored and 17 positive or significantly positive.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 7. The plan objective scored positively / significantly positive against 17 IA objectives where it would have a beneficial impact.
PO8 Uplifting the health and well-being of our residents and local communities	PO8 scored a mixture of neutral, positives and significantly positive scores. There were 6 neutral scored and 20 positive or significantly positive.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 8. The plan objective scored positively / significantly positive against 20 IA objectives where it would have a beneficial impact
PO9 Improving and valuing a better built environment	PO9 scored a mixture of neutral, positives and significantly positive scores. There were 10 neutral scored and 16 positive or significantly positive.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 9. The plan objective scored positively / significantly positive against 16 IA objectives where it would have a beneficial impact.
PO10 Promoting accessible and sustainable transport choices	PO10 scored a mixture of neutral, positives and significantly positive scores. There	No adverse effects were identified therefore no changes were required to	No enhancements were identified to plan objective 10. The plan objective scored

Part of Draft Local Plan assessed	Scoring	Adverse effects	Beneficial effects
	were 11 neutral scored and 15 positive or significantly positive.	mitigate adverse effects.	positively / significantly positive against 15 IA objectives where it would have a beneficial impact.

Table 5: Summary of the appraisal of the Oldham Draft Local Plan Policies

	Scoring	Mitigation	Enhancement
HOMES			
Policy H1: Delivering a Diverse Housing Offer	Policy H1 scored a mixture of potentially negative, neutral, positives and significantly positive scores. There were 13 neutral scored and 12 positive or significantly positive.	<p>A negative score was given as sites in the housing land supply could include open spaces. Mitigation would be provided through Policy CO1.</p> <p>The policy has been screened in by HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address any likely significant effects.</p>	None
Policy H2: Housing Mix	Policy H2 scored a mixture of neutral, positives and significantly positive scores. There were 13 neutral scored and 13 positive or significantly positive.	The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.	None
Policy H3: Density of New Housing	Policy H3 scored a mixture of neutral, positives and significantly positive scores. There were 12 neutral scored and 13 positive or significantly positive.	The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.	None
Policy H4: Homes for Older People	Policy H4 scored a mixture of neutral, positives and significantly positive scores. There were 15 neutral scored and 11 positive or significantly positive.	The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic)	None

	Scoring	Mitigation	Enhancement
		and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.	
Policy H5: Homes for Disabled People	Policy H5 scored a mixture of neutral, positives and significantly positive scores. There were 16 neutral scored and 10 positive or significantly positive.	The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.	In relation to IA17 the IA identified that the policy reasoned justification could reference accessibility to key services and public transport to improve effectiveness. Reference to accessibility and policies H1 and CO9 was added to the reasoned justification of the policy.
Policy H6: Homes for Children and Care Leavers	Policy H6 scored a mixture of neutral, positives and significantly positive scores. There were 14 neutral scored and 12 positive or significantly positive.	The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.	
Policy H7: Affordable Housing	Policy H7 scored a mixture of neutral, positives and significantly positive scores. There were 18 neutral scored and 8 positive or significantly positive.	The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.	
Policy H8: Vacant Building Credit	Policy H8 scored a mixture of neutral, positives and significantly positive scores. There were 16 neutral scored and 10 positive or significantly positive.	None	None
Policy 9: Rural Exception Sites	Policy H9 scored a mixture of potentially negative, uncertain, neutral, positives and significantly positive scores. There	A negative score was given as rural exception sites are likely to be in the Green Belt and possibly including	None

	Scoring	Mitigation	Enhancement
	<p>were 17 neutral scored and 3 positive or significantly positive.</p> <p>There was a mixed score of +/- against IA 18 (regeneration)</p>	<p>greenfield sites. However, policy OL2 would need to be met.</p> <p>The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.</p>	
Policy H10: Houses in Multiple Occupation	<p>Policy H10 scored a mixture of neutral, positives and significantly positive scores. There were 15 neutral scored and 11 positive or significantly positive.</p>	<p>The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.</p>	None
Policy H11: Custom / Self-Build and Community-led Housing	<p>Policy H11 scored a mixture of neutral, positives and significantly positive scores. There were 20 neutral scored and 6 positive or significantly positive.</p>	<p>The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.</p>	None
Policy H12: Gypsies, Travellers and Travelling Showpeople	<p>Policy H12 scored a mixture of neutral, positives and significantly positive scores. There were 19 neutral scored and 7 positive or significantly positive.</p>	<p>The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.</p>	None

	Scoring	Mitigation	Enhancement
Policy H13: Housing and Mixed-Use Allocations	<p>Policy H13 scored a mixture of potentially negative, uncertain, neutral, positives and significantly positive scores. There were 9 neutral scored and 14 positive or significantly positive.</p> <p>A X/? score was given against IA 1(green infrastructure) and a +/? score was given for IA11 (soil) due to loss of soil / green infrastructure as some sites may include greenfield sites / open space.</p>	<p>No mitigation required as Policies N1 to N3 and CO1 mitigates loss of open space.</p> <p>The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.</p>	None
ECONOMY AND EMPLOYMENT			
Policy E1 – Business and Employment Areas	<p>Policy E1 scored a mixture of neutral, positives and significantly positive scores. There were 17 neutral scored and 9 positive or significantly positive.</p>	<p>The HRA has screened the policy, and the individual Business Employment Areas proposed for designation through Policy E1, in as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows).</p> <p>There may also be possible direct impacts on the Rochdale Canal SAC from development within 200m of the Canal.</p> <p>The HRA identifies mitigation measures to address likely significant effects.</p>	None
Policy E2 – Exceptions within Business and Employment Areas and other existing employment sites	<p>Policy E2 scored a mixture of uncertain, neutral, positives and significantly positive scores. There were 20 neutral scored and 5 positive or significantly positive.</p>	<p>The HRA has screened the site in as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows).</p>	None

	Scoring	Mitigation	Enhancement
		<p>There may also be possible direct impacts on the Rochdale Canal SAC from development within 200m of the Canal.</p> <p>The HRA identifies mitigation measures to address likely significant effects.</p>	
Policy E3 – Reuse and redevelopment of Mill Buildings	Policy E3 scored a mixture of neutral, positives and significantly positive scores. There were 21 neutral scored and 5 positive or significantly positive.	<p>The HRA has screened the site in as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows).</p> <p>There may also be possible direct impacts on the Rochdale Canal SAC from development within 200m of the Canal.</p> <p>The HRA identifies mitigation measures to address likely significant effects.</p>	None
Policy E4 – Office, Industry and Warehousing Allocations	Policy E3 scored a mixture of uncertain, neutral, positives and significantly positive scores. There were 20 neutral scored and 5 positive or significantly positive.	The HRA has screened the policy in due to possible impacts on European sites arising from air pollution effects. The HRA identifies mitigation measures to address likely significant effects.	None
TOURISM			
Policy TM1 – Tourism	Policy TM1 scored a mixture of neutral, positives and significantly positive scores. There were 10 neutral scored and 16 positive or significantly positive.	The HRA has screened the policy in due to possible cause of increase in recreational disturbance, both to the Canal and to the South Pennine Moors. The HRA identifies mitigation measures to address likely significant effects.	None
Policy TM2 – Farm Diversification	Policy TM2 scored a mixture of uncertain, neutral, positives and significantly positive scores. There were 19 neutral	None	None

	Scoring	Mitigation	Enhancement
	scored and 6 positive or significantly positive.		
CENTRES			
Policy C1 – Our Centres	Policy C1 scored a mixture of neutral, positives and significantly positive scores. There were 13 neutral scored and 13 positive or significantly positive.	None	None
Policy C2 – Local Services and Facilities	Policy C2 scored a mixture of neutral, positives and significantly positive scores. There were 17 neutral scored and 9 positive or significantly positive.	None	None
Policy C3 – Retail and Leisure Impact Assessments and Sequential Tests	Policy C3 scored a mixture of neutral, positives and significantly positive scores. There were 16 neutral scored and 10 positive or significantly positive.	None	None
Policy C4 – Changes of use and redevelopment within the borough’s centres	Policy C3 scored a mixture of neutral, positives and significantly positive scores. There were 13 neutral scored and 13 positive or significantly positive. In relation to IA18 (regeneration) and IA19 (economic growth) the effects increase from + in the short term to ++ in the long term.	None	None
OLDHAM TOWN CENTRE			
Policy OTC1: Oldham Town Centre	Policy OTC1 scored a mixture of neutral, positives and significantly positive scores. There were 3 neutral scored and 23 positive or significantly positive.	None	None

	Scoring	Mitigation	Enhancement
	IA6 (Efficient use of land); IA15 (local environmental quality); IA18 (regeneration); IA19 (economic growth); IA20 (centres); IA21 (tourism) and IA26 (inclusive communities) increased in effects over time from + in the short term to ++ in the long term.		
Policy OTC2: Protecting and Enhancing Oldham Town Centre Conservation Area	Policy OTC2 scored a mixture of neutral, positives and significantly positive scores. There were 8 neutral scored and 18 positive or significantly positive.	None	Policy amended from 'appropriate greening' to 'appropriate multi-functional green infrastructure' to ensure many benefits are delivered from greening against IA objectives 1 on green infrastructure, IA2 on open space and IA9 on flood risk.
Policy OTC3: Creating a Better Public Realm for Oldham Town Centre	Policy OTC3 scored a mixture of neutral, positives and significantly positive scores. There were 10 neutral scored and 16 positive or significantly positive.	None	None
Policy OTC4 - Green Infrastructure within and around Oldham Town Centre	Policy OTC4 scored a mixture of neutral, positives and significantly positive scores. There were 6 neutral scored and 20 positive or significantly positive.	None	None
Policy OTC5 - Creating better vehicular parking and drop off facilities in Oldham Town Centre	Policy OTC5 scored a mixture of neutral, positives and significantly positive scores. There were 17 neutral scored and 9 positive or significantly positive.	None	None
ADDRESSING CLIMATE CHANGE			

	Scoring	Mitigation	Enhancement
Policy CC1 – Sustainable Construction, Energy Efficiency and Retrofitting	<p>Policy cc1 scored a mixture of neutral, positives and significantly positive scores. There were 13 neutral scored and 14 positive or significantly positive.</p> <p>IA8 (health), IA14 (air quality) and IA18 (regeneration and disparity) scored + in the short term to ++ in the long time.</p>	None	None
Policy CC2 Renewable & Low Carbon Energy	<p>Policy OTC5 scored a mixture of potentially negative, neutral, positives and significantly positive scores. There were 13 neutral scored and 13 positive or significantly positive.</p> <p>Mixed scores of --/x were given against IA2 (open space) and IA11 (soil) as the policy partially met the objective. IA18 also scored --/x as minerals is not included within the criteria.</p> <p>IA18 (energy) scored + in the short term to ++ in the long term</p>	<p>For IA2 the policy was mitigated by ensuring that open space is included within the criteria.</p> <p>For IA11 the policy was mitigated by ensuring that loss of high-quality soil and agricultural land was included within the criteria.</p> <p>For IA24 a new criterion referring to Minerals Safeguarding Areas has been added.</p>	None
Policy CC3 - Managing Flood Risk	<p>Policy CC3 scored a mixture of neutral, positives and significantly positive scores. There were 14 neutral scored and 12 positive or significantly positive.</p>	None	None
Policy CC4 - Sustainable Drainage – Foul and Surface Water	<p>Policy CC4 scored a mixture of neutral, positives and significantly positive scores. There were 15 neutral scored and 11 positive or significantly positive.</p>	None	None
Policy CC5 - Water Efficiency	<p>Policy CC5 scored a mixture of neutral, positives and significantly positive scores.</p>	None	None

	Scoring	Mitigation	Enhancement
	There were 17 neutral scored and 9 positive or significantly positive.		
Policy CC6 Groundwater Source Protection Zones	Policy CC6 scored a mixture of neutral, positives and significantly positive scores. There were 22 neutral scored and 4 positive or significantly positive.	None	None
NATURAL ENVIRONMENT AND OPEN LAND			
Policy OL1 Consideration for the Peak District National Park	Policy OL1 scored a mixture of potentially negative, neutral, positives and significantly positive scores. There were 17 neutral scored and 8 positive or significantly positive.	IA12 scored negative as policy could constrain renewable energy, in particular wind energy, however mitigation is not required as this area is unlikely to be acceptable for wind turbines and other plan policies address energy.	None
Policy OL2 Protecting and enhancing Oldham's Green Belt	<p>Policy OL2 scored a mixture of potentially negative, uncertain, neutral, positives and significantly positive scores. There were 8 neutral scored and 17 positive or significantly positive.</p> <p>IA12 (energy) scored a mixed score of X/? as the policy could constrain some types of low carbon energy in the Green Belt.</p> <p>IA16 scored a mixed score of +/-/? As the policy may enhance the Green Belt including walking and cycling routes but specific improvements are not identified.</p>	For IA12 mitigation is not needed as it may not be acceptable for renewable schemes, particularly wind turbines, to be permitted and proposals needs to be determined on their own merits in line with plan policies. Other policies address energy including CC1 and CC2.	None
Policy OL3 Extensions and alterations to	Policy OL3 scored a mixture of neutral, positives and significantly positive scores.	None	For clarity, in relation to IA4 design was mentioned twice in the policy criteria and therefore to remove repetition

	Scoring	Mitigation	Enhancement
existing buildings within the Green Belt	There were 22 neutral scored and 4 positive or significantly positive.		reference to design was removed form criterion 1.
Policy OL4 Local Green Space	Policy OL4 scored a mixture of neutral, positives and significantly positive scores. There were 8 neutral scored and 18 positive or significantly positive.	None	None
Policy OL5 Protecting dark skies and tranquillity	Policy OL5 scored a mixture of neutral, positives and significantly positive scores. There were 17 neutral scored and 9 positive or significantly positive.	None	None
ADDRESSING THE BIODIVERSITY EMERGENCY			
Policy N1 Protecting Nature	Policy N1 scored a mixture of neutral, positives and significantly positive scores. There were 14 neutral scored and 12 positive or significantly positive.	None	None
Policy N2 Restoring Nature	Policy N2 scored a mixture of neutral, positives and significantly positive scores. There were 5 neutral scored and 21 positive or significantly positive.	None. Uncertainty was expressed as there may be overlap between BNG and minerals. Any offset sites would not be able to be worked for minerals but wouldn't necessarily sterilise as such. Therefore, no mitigation needed and Minerals DPD addresses minerals.	None
Policy N3 Enhancing Green Infrastructure through development	Policy N3 scored a mixture of neutral, positives and significantly positive scores. There were 5 neutral scored and 21 positive or significantly positive. IA13 (resilience) scores + in the short term to ++ in the long term.	None	None

	Scoring	Mitigation	Enhancement
Policy N4 Tree Replacement	<p>Policy N4 scored a mixture of neutral, positives and significantly positive scores. There were 15 neutral scored and 11 positive or significantly positive.</p> <p>IA8 (health), IA9 (flood risk), IA11 (soil quality), IA13 (climate change) and IA14 (air quality) scored neutral in the short term to positive in the medium and long term as in the short term, any tree loss that is compensated will not give significant benefits when first planted to health, flood risk mitigation, soil quality, climate change resilience and air quality.</p>	None	None
OLDHAM'S HISTORIC ENVIRONMENT			
Policy HE1 – The Historic Environment	Policy HE1 scored a mixture of neutral, positives and significantly positive scores. There were 9 neutral scored and 17 positive or significantly positive.	None	None
Policy HE2 Securing the Preservation and Enhancement of Oldham's Heritage Assets	Policy HE2 scored a mixture of neutral, positives and significantly positive scores. There were 10 neutral scored and 16 positive or significantly positive.	None	None
Policy HE3 Development proposals affecting conservation areas	Policy HE3 scored a mixture of neutral, positives and significantly positive scores. There were 14 neutral scored and 12 positive or significantly positive.		
Policy HE4 Oldham's Mills	Policy N4 scored a mixture of neutral, positives and significantly positive scores.	None	None

	Scoring	Mitigation	Enhancement
	<p>There were 15 neutral scored and 11 positive or significantly positive.</p> <p>IA20 (centres) scored + in the short term to ++ in the medium and long term as conservation areas should be enhanced over time).</p>		
Policy HE5 Canals	<p>Policy HE5 scored a mixture of neutral, positives and significantly positive scores. There were 11 neutral scored and 15 positive or significantly positive.</p>	None	In relation to IA1 (biodiversity and green infrastructure) and IA2 (open space) the policy wording was amended from open space to green infrastructure.
CREATING A BETTER AND BEAUTIFUL OLDHAM			
Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development	<p>Policy D1 scored a mixture of neutral, positives and significantly positive scores. There were 8 neutral scored and 18 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA1 (green infrastructure); IA7 (infrastructure); IA8 (health); IA9 (flood risk); IA13 (climate change); IA17 infrastructure; IA20 (centres); and IA23 (housing).</p>	None	None
Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments	<p>Policy D2 scored a mixture of neutral, positives and significantly positive scores. There were 10 neutral scored and 16 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA1 (green infrastructure); IA7</p>	None	None

	Scoring	Mitigation	Enhancement
	(infrastructure; IA8 (health); IA9 (flood risk); IA13 (climate change); IA17 infrastructure; and IA18 (regeneration);		
Policy D3 - Design Scrutiny	<p>Policy D3 scored a mixture of neutral, positives and significantly positive scores. There were 9 neutral scored and 17 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA1 (green infrastructure); IA2 (open spaces); IA7 (infrastructure; IA12 (energy); IA13 (climate change); and IA16 (transport).</p>	None	None
Policy D4 – Creating Better Views, Gateways and Taller Buildings	<p>Policy D4 scored a mixture of neutral, positives and significantly positive scores. There were 18 neutral scored and 8 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA17 infrastructure; and IA18 (regeneration); IA 20 (centres); and IA26 (inclusive communities).</p>	None	None
Policy D5 – Improving the Quality of Advertisements and Signage in Oldham	<p>Policy D5 scored a mixture of neutral, positives and significantly positive scores. There were 22 neutral scored and 4 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA 20 (centres); and IA26.</p>	None	None
Policy D6 – Creating a Better Public Realm in Oldham	Policy D6 scored a mixture of neutral, positives and significantly positive scores.	None	None

	Scoring	Mitigation	Enhancement
	<p>There were 10 neutral scored and 16 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA9 (flood risk); IA13 (climate change); and IA14 (air quality).</p>		
Policy D7 - Development within the curtilage of a dwellinghouse	<p>Policy D7 scored a mixture of neutral, positives and significantly positive scores. There were 20 neutral scored and 6 positive or significantly positive.</p>	None	None
CREATING A SUSTAINABLE, ACTIVE, ACCESSIBLE NETWORK FOR OLDHAM			
Policy T1 – Delivering Oldham’s Transport Priorities	<p>Policy T1 scored a mixture of neutral, positives and significantly positive scores. There were 12 neutral scored and 14 positive or significantly positive.</p>	None	None
Policy T2 – Creating Sustainable Streets	<p>Policy T2 scored a mixture of neutral, positives and significantly positive scores. There were 9 neutral scored and 17 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA1 (green infrastructure); IA2 (open space); IA9 (flood risk); IA13 (climate change); IA15 (environmental quality); IA18 (regeneration); IA19 (economic growth); IA20 (centres); and IA26 (inclusive communities).</p>	None	None

	Scoring	Mitigation	Enhancement
Policy T3 – Car Parking Standards in Oldham	<p>Policy T3 scored a mixture of neutral, positives and significantly positive scores. There were 14 neutral scored and 12 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA5 (design); IA6 (efficient use of land); IA7 (infrastructure); IA9 (flood risk); IA8 (health); IA14 (air quality); IA17 (access to key services); IA20 (centres); IA21 (tourism); and IA26 (inclusive communities).</p>	None	None
Policy T4 – Providing for electric vehicle charging points	<p>Policy T4 scored a mixture of neutral, positives and significantly positive scores. There were 20 neutral scored and 6 positive or significantly positive.</p> <p>Effects increase from + to ++ over time against IA7 (infrastructure); IA15 (local environmental quality); and IA16 (sustainable transport).</p>	None	None
Policy T5 – Transport Statements, Assessments and Travel Plans in New Development	<p>Policy T5 scored a mixture of neutral, positives and significantly positive scores. There were 16 neutral scored and 10 positive or significantly positive.</p>	None	None
COMMUNITIES			
Policy CO1 - Protection of Existing Open Spaces	<p>Policy CO1 scored a mixture of neutral, positives and significantly positive scores. There were 7 neutral scored and 19 positive or significantly positive.</p>	None	None

	Scoring	Mitigation	Enhancement
Policy CO2 - New and Enhanced Open Spaces	Policy CO2 scored a mixture of neutral, positives and significantly positive scores. There were 7 neutral scored and 19 positive or significantly positive.	None	None
Policy CO3 - Open Space Standards	Policy CO3 scored a mixture of neutral, positives and significantly positive scores. There were 8 neutral scored and 18 positive or significantly positive.	None	None
Policy CO4 Cultural, Community and Health Facilities	Policy CO4 scored a mixture of neutral, positives and significantly positive scores. There were 16 neutral scored and 10 positive or significantly positive. Effects increase from + to ++ over time against IA3 (landscapes and townscapes); IA4 (heritage); IA8 (health); IA18 (regeneration); IA19 (economic growth); IA20 (centres); IA21 (tourism); IA22 (education); and IA26 (inclusive communities).	None	None
Policy CO5: Education and Skills	Policy CO5 scored a mixture of neutral, positives and significantly positive scores. There were 13 neutral scored and 13 positive or significantly positive.	None	None
Policy CO6: Securing Educational Places through New Residential Development	Policy CO6 scored a mixture of neutral, positives and significantly positive scores. There were 20 neutral scored and 6 positive or significantly positive.	None	None
Policy CO7 – Health Impact Assessments	Policy CO7 scored a mixture of neutral, positives and significantly positive scores.	None	None

	Scoring	Mitigation	Enhancement
in New Development	There were 18 neutral scored and 8 positive or significantly positive.		
Policy CO8 Hot Food Takeaways	Policy CO8 scored a mixture of neutral, positives and significantly positive scores. There were 21 neutral scored and 5 positive or significantly positive.	None	None
Policy CO9 Creating Sustainable and Accessible Communities	Policy CO9 scored a mixture of neutral, positives and significantly positive scores. There were 15 neutral scored and 11 positive or significantly positive.	None	None
PROTECTING OUR LOCAL ENVIRONMENT			
Policy LE1 - Noise Pollution and Vibration in New Development	Policy LE1 scored a mixture of neutral, positives and significantly positive scores. There were 15 neutral scored and 11 positive or significantly positive. Effects increase from + to ++ over time against IA8 (health) and IA15 (environmental quality).	None	None
Policy LE2 - Ground Conditions and Contaminated Land	Policy LE2 scored a mixture of neutral, positives and significantly positive scores. There were 18 neutral scored and 8 positive or significantly positive. Effects increase from + to ++ over time against IA18 (regeneration);	None	None
Policy LE3 - Air Quality	Policy LE3 scored a mixture of neutral, positives and significantly positive scores. There were 17 neutral scored and 9 positive or significantly positive.	None	None

	Scoring	Mitigation	Enhancement
INFRASTRUCTURE AND DELIVERY			
Policy IN1 Digital Infrastructure and Telecommunications	Policy IN1 scored a mixture of neutral, positives and significantly positive scores. There were 22 neutral scored and 4 positive or significantly positive.	None	None
Policy IN2 – Planning Obligations	Policy IN2 scored a mixture of neutral, positives and significantly positive scores. There were 5 neutral scored and 21 positive or significantly positive.	None	None
Policy IN3 - Delivering Social Value and Inclusion	Policy IN3 scored a mixture of neutral, positives and significantly positive scores. There were 19 neutral scored and 7 positive or significantly positive.	None	None

Allocations

- 4.10 Each proposed site allocation for development in the Draft Plan has been appraised. The full IA appraisal can be seen in Appendix 17 of IA, where details of mitigation and/or enhancements can be seen. However, generally mitigation is provided through other plan policies either in Places for Everyone (Pfe) or other Local Draft Plan policies as the plan should be read as a whole. Examples of the policies that would help provide mitigation have been expressed in the full IA in the appendix.
- 4.11 A summary of the IA findings for each potential allocation can be found in Table 43, Section 7, of the IA Report. Details of the site selection methodology can be found in the site selection topic paper.

Table 6: Summary of the appraisal of the Oldham Draft Local Plan potential allocations

Housing and Mixed-Use potential allocations	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Office, Industry and Warehousing potential allocations	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.

Equalities Impact Assessment

- 4.12 The Equality Duty requires consideration of how different people will be affected by public sector activities, helping the sector to deliver policies and services which are efficient and effective; accessible to all; and which meet different people's needs.
- 4.13 The EIA process considers the effects of the Local Plan review on the following groups - Disabled people; Care leavers; particular ethnic groups; men or women (including impacts due to pregnancy / maternity); people of particular sexual orientation/s; people in a marriage or civil partnership; people who are proposing to undergo, are undergoing or have undergone a process, or part of a process, of gender reassignment; people of low incomes; people in particular age groups; and groups with particular faiths and beliefs.
- 4.14 For the purposes of assessing the Draft Local Plan the EIA is addressed through the Oldham Impact Assessment (OIA) tool. The OIA tool has been developed by Oldham Council and is used to assess the impact of relevant policies, programmes and decisions on the equalities characteristics, our corporate priorities and the Future Oldham aims.
- 4.15 The OIA concluded that there was no negative impact from the Draft Local Plan on the equality characteristics. The Plan also scored positively in relation to several of the council's Corporate Priorities and all of the Future Oldham aims.

Health Impact Assessment

- 4.16 The role of a HIA is to assess the potential health and well-being impacts of the Local Plan review.
- 4.17 The assessment has assessed the Draft Local Plan against the following themes:
- Housing design and affordability;
 - Social infrastructure and accessibility;
 - Access to open space and nature;
 - Air Quality, noise and neighbourhood amenity;
 - Accessibility and active travel;
 - Crime reduction and community safety;
 - Access to healthy food;
 - Access to work and training;
 - Social cohesion and inclusive design;
 - Minimising the use of resources; and
 - Climate Change.
- 4.18 It is considered that there are no gaps where the Draft Local Plan has not addressed the above themes. As such, it is concluded that health impacts have been sufficiently addressed by the Draft Local Plan to support the need to improve health and well-being and reduce health inequalities.

Habitat Regulations Assessment

- 4.19 A Habitats Regulations Assessment (HRA) has been prepared on the Draft Local Plan by the Greater Manchester Ecology Unit (GMEU). Through the Screening and Appropriate Assessment the HRA has assessed whether the Draft Local Plan needs to be amended to avoid harm to European sites or if a more detailed Assessment of impacts is required.
- 4.20 The HRA identifies that the following European designated sites have the potential to be affected by development proposed and planned for within the Oldham Draft Local Plan:
- Rochdale Canal Special Area of Conservation (SAC)
 - South Pennine Moors SAC
 - Dark Peak Moors (South Pennine Moors Phase 1) Special Protection Area (SPA)
 - South Pennine Moors Phase 2 SPA

The findings of the ‘Screening’

- 4.21 The first stage of the HRA is to carry out a Likely Significant Effect Test, otherwise known as Screening. This is essentially a risk assessment to decide whether a particular policy, or proposed site allocation, can be effectively ‘screened out’ from further, more detailed assessment, or if it needs to go forward for more detailed Assessment (and therefore ‘screened in’.
- 4.22 Through this process the policies in Table 7 below have been ‘screened in’.

Table 7: ‘Screened in’ Draft Local Plan policies

Homes
Policy H1: Delivering a Diverse Housing Offer
Policy H2: Housing Mix
Policy H3: Density of New Housing
Policy H4: Homes for Older People
Policy H5: Homes for Disabled People
Policy H6: Homes for Children and Care Leavers
Policy H7: Affordable Housing
Policy H9: Rural Exception Sites
Policy H10: Houses in Multiple Occupation
Policy H11: Custom/ Self-Build and Community-led Housing
Policy H12: Gypsies, Travellers and Travelling Showpeople
Policy H13: Housing and Mixed-Use Allocations
Economy and Employment
Policy E1: Business and Employment Areas
Policy E2: Exceptions within Business and Employment Areas and other existing employment sites
Policy E3: Reuse and redevelopment of Mill Buildings
Policy E4: Allows the allocation of new office, industry and warehousing allocations
Tourism
Policy TM1: Tourism

- 4.23 All the potential allocations for housing and mixed-use development identified in Draft Local Plan Policy H13 and all the potential allocations for office, industry and warehousing identified in Draft Local Plan Policy E4 were ‘screened in’ for further Assessment.

- 4.24 As part of the assessment of Draft Local Plan Policy E1 all Business Employment Areas have been individually assessed and 'screened in'.

The findings of the 'Appropriate Assessment'

- 4.25 The initial Screening process identified the following sources as potentially likely to have a likely significant effect (LSE) on the European designated sites listed at paragraph 4.20 above:

- Effects on functionally linked land
- Recreational pressure
- Air pollution (arising from increased road traffic)
- Direct impact (sites within 200m of the Rochdale Canal SAC)

- 4.26 These likely significant effects have therefore been considered as part of the Appropriate Assessment, with the following conclusions drawn:

- Having assessed the potential site allocations identified in Draft Local Plan policies H13 and E4 it is considered that the operation of the Oldham Draft Local Plan will have no Likely Significant Effects on Functionally Linked Land.
- With regards to recreational pressure:
 - Draft Local Plan Policy TM1 Tourism is considered to have potential to cause increased disturbance of the Rochdale Canal by potentially causing an increase in canal boat movements. It is concluded, however, that there are sufficient safeguards in place to effectively avoid any Likely Significant Effects on the Rochdale Canal SAC arising from the operation of Policy TM1.
 - The operation of the Oldham Draft Local Plan is considered likely to cause recreational disturbance effects on the above upland designated sites of the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA. This is because new homes planned for in the Draft Local Plan may cause an increase in local populations, and these population increases may in turn cause increased recreational disturbance as people pursue leisure activities in the uplands. This impact has already been assessed as part of the HRA of the Places for Everyone Joint Development Plan and it is considered that its conclusions, recommendations and proposed mitigations measures also apply to the Oldham Draft Local Plan:
 - To mitigate for increases in recreational disturbance in the uplands, the HRA of PfE recommends that a Strategic Access Management and Monitoring Strategy (SAMMS) is developed and that Suitable Alternative Natural Greenspace (SANG) is provided to mitigate recreation pressure impacts on the South Pennine Moors SPA/SAC, which new development within 7km of the SPA/SAC will need to contribute towards providing. The SAMMS and SANG measures will be funded through developer contributions on planning permission for new development and further detail regarding how this will be implemented is to be set out in a Supplementary Planning Document (SPD).
 - In addition to these PfE measures there are also a number of policies within the Oldham Draft Local Plan which will act to mitigate any possible increases in

recreational pressures, and which will serve to protect designated sites. These Policies include:

- Policy N1 Protecting Nature; and
 - Policy N3 Enhancing Green Infrastructure through development
- With regards to air pollution it is recognised that air pollution from increased road traffic can cause harm to sensitive habitats, including habitats associated with the designation of the South Pennine Moors and the Peak District Moors. The Assessment concludes that:
 - Increased traffic movements in the vicinity of the Rochdale Canal SAC and arising from the development of sites close to the Canal will not have a harmful effect on the special interest of the Canal – that is, no adverse effect on the integrity of this site will arise. On this basis, it is concluded that any increase in nitrogen deposition above the screening thresholds at this site will not have any adverse effect on the measures currently being implemented to achieve the site’s conservation objective.
 - The operation of the Oldham Draft Local Plan is considered likely to have the potential to cause effects on the above upland designated sites through increases in air pollution, because new homes planned for in the Plan may cause an increase in traffic flows on certain routes. This impact has already been assessed as part of the HRA of the Places for Everyone Joint Development Plan and it is considered that its conclusions, recommendations and proposed mitigations measures also apply to the Oldham Draft Local Plan. In this instance the HRA of Places for Everyone concluded that:
 - There would be no Likely Significant Effects on the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA resulting from air pollution.
 - There may be air pollution impacts from the operation of the Plan (that is Places for Everyone) on part of the Manchester Mosses SAC (Holcroft Moss) and advised that mitigation was required for this impact. The necessary mitigation has been incorporated into Places for Everyone Policy JP-C7 Transport Requirements of New Development, which states that planning applications which are required to be accompanied by a Transport assessment will need to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of conservation (SAC). As such, the proposed mitigation would apply to relevant developments within Oldham in accordance with JP-C7.
 - In addition, there are several other policies proposed in the Oldham Draft Local Plan which will act to mitigate any possible increases in air pollution and serve to protect designated sites.
 - Finally, with regards to Direct Impact (where sites are within 200m of the Rochdale Canal SAC) several potential allocations were assessed in this regard and it was concluded that both effects from diffuse water pollution and shading could be readily avoided by using established mechanisms, although it is recommended that detailed planning proposals for these sites are informed by project-level HRAs. Draft Local Plan Policy N1 Protecting Nature would apply to developments on relevant sites which further serve to avoid significant effects on the special interest of the Canal.

The conclusions of the Integrated Assessment

- 5.1 The IA has incorporated the SEA/SA requirements and also the EIA, HRA and HIA. Together these demonstrate that the Oldham Draft Local Plan results in many positive outcomes which should lead to a net gain in sustainability benefits.
- 5.2 Some mitigation and enhancements as part of the IA process have been identified for specific plan objectives, plan policies and proposed site allocations. Generally, however mitigation, where required, would be provided through Places for Everyone (upon its adoption) and other policies in the Draft Local Plan. The Local Plan must be read as a whole.
- 5.3 The HRA has screened the Draft Local Plan and undertaken appropriate assessment. The HRA has also outlined measures to mitigate any significant effects.
- 5.4 The IA is an iterative process and is reviewed and updated as the Local Plan is prepared. As such, a further IA will be undertaken on the Local Plan Review at Publication stage.