Oldham Local Plan

Local Plan Review: Draft Local Plan Integrated Assessment



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Availability

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1. ABBREVIATIONS

1.1 The following is a list of abbreviations used in the IA (including the Scoping Report).

AGMA - Association of Greater Manchester Authorities

BEA – Business and Employment Areas

BFHL - Building for a Healthy Life

BNG – Biodiversity Net Gain

CAAMP – Conservation Area Appraisal and Management Plan

CDA – Critical Drainage Areas

DBEIS - Department for Business, Energy and Industrial Strategy

DCLG - Department for Communities and Local Government

DEFRA - Department for Environment, Food and Rural Affairs

DfE - Department for Education

DOH - Department of Health

DPD - Development Plan Document

DWMP – Drainage and Water Management Plan

EIA - Equality Impact Assessment

FRA – Flood Risk Assessment

GI - Green Infrastructure

GM – Greater Manchester

GMAAS – Greater Manchester Archaeological Advisory Service

GMCA - Greater Manchester Combined Authority

GMEU - Greater Manchester Ecology Unit

HIA - Health Impact Assessment

Ha - Hectare

IA - Integrated Assessment

HER – Historic Environment Record

HMOs – Houses in Multiple Occupation

HRA - Habitats Regulations Assessment

IMD – Index of Multiple Deprivation

JNCC - Joint Nature Conservation Committee

LACW - Local Authority Collected Waste

LCT - Landscape Character Type

LGS – Local Green Space

LNR - Local Nature Reserve

LNRS – Local Nature Recovery Strategy

LRFD - Land Reserved for Future Development

MPA - Minerals Planning Authorities

MSA - Minerals Safeguarding Area

NEET - Not in Education, Employment or Training

NHS - National Health Service

NO2 – Nitrogen Dioxide

NPPF - National Planning Policy Framework

NPPG - National Planning Practice Guidance

ODPM - Office of the Deputy Prime Minister (now DCLG)

ONS - Office for National Statistics

OPOL - Other Protected Open Land

PDNP – Peak District National Park

PDL - Previously Developed Land

PfE – Places for Everyone

PROW - Public Rights of Way

RJ – Reasoned Justification

RIGS - Regionally Important Geodiversity Site

\$106 – Section 106

SA - Sustainability Appraisal

SAC - Special Area of Conservation

SBI - Site of Biological Importance

SEA - Strategic Environmental Assessment

SEA – Saddleworth Employment Area

SFRA – Strategic Flood Risk Assessment

SHLAA - Strategic Housing Land Availability Assessment

SPA - Special Protection Areas

SPD - Supplementary Planning Document

SPZ - Source Protection Zone

SQM – Square Metres

SRN – Strategic Road Network

SSSIs - Sites of Special Scientific Interest

SUDS - Sustainable Drainage Systems

TFGM - Transport for Greater Manchester

UDP – Unitary Development Plan

2 INTRODUCTION

Local Plan Review

- 2.1 This report is the Integrated Assessment (IA) for the Local Plan review: Draft Plan. A separate non-technical summary has also been prepared.
- 2.2 Oldham's Joint Core Strategy and Development Management Policies Development Plan Document (DPD) was adopted on 9 November 2011.
- 2.3 Since then work started on Places for Everyone (PfE). PfE is a long-term plan of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) for jobs, new homes, and sustainable growth. It has been published by the GMCA on behalf of the nine districts.
- 2.4 The plan is a joint development plan of the nine districts which will determine the kind of development that takes place in their boroughs, maximising the use of brownfield land and urban spaces while protecting Green Belt land from the risk of unplanned development. It will also ensure all new developments are sustainably integrated into Greater Manchester's transport network or supported by new infrastructure.
- 2.5 More information on PfE and the stage it is at can be found on the Places for Everyone website at https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/.
- 2.6 PfE does 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, that matter to our residents and businesses and provide a positive local planning framework to address those issues. Once PfE is adopted, all nine Local Plans will be required to be in general conformity with it.
- 2.7 In addition, National Planning Policy requires Local Plans to be kept up to date and suggests policies in local plans should be reviewed to assess whether they need updating at least once every five years. As the Joint DPD was adopted in 2011 it is timely to carry out a review of the Local Plan.
- 2.8 Oldham's Local Plan will guide development in the borough up to 2039. It will eventually replace the current plan (Joint Core Strategy and Development Management Policies DPD) which was adopted in November 2011 and any saved planning policies that are not being superseded by PfE.
- 2.9 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.
- 2.10 Oldham's 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.
- 2.11 It is essential that the Local Plan review helps to achieve sustainable development.

Sustainable development

2.12 Sustainable development is defined in National Planning Policy Framework (NPPF) as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

- 2.13 NPPF highlights that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
 - 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 role 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.
- 2.14 NPPF recognises that Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gain). Significant adverse impacts on these objectives 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).
- 2.15 The SA will be incorporated into an IA of the Local Plan review.

3 Purpose of an Integrated Assessment

3.1 In recognition that there will be linkages across the various assessments undertaken on the Local Plan, the SA, Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EIA) and Health Impact Assessment (HIA) will all form part of the 'Integrated Assessment' (IA). Each element of the IA is explained below. It will assess the economic, social and economic performance of the plan.

Sustainability Appraisal / Strategic Environmental Assessment

- 3.2 The role of a SA is to promote sustainable development through assessing the emerging Local Plan against economic, environmental and social objectives (including opportunities for net gain). 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).
- 3.3 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.
- 3.4 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.
- 3.5 SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 so that the potential environmental effects are given full consideration.
- 3.6 Therefore the IA for the Local Plan review will incorporate the requirements of the Directive and its Regulations.
- 3.7 An IA will be undertaken and developed for each stage of the Local Plan review. This report is the IA for the Draft Local Plan. It provides an explanation for how the recommendations from the 2021 IA have been considered in the development of the 2023 Draft Plan.

Environmental Outcomes Report

- 3.8 On 17 March 2023, DLUHC published a new approach to environmental assessment. The consultation sought views on a proposed new system of environmental assessment ('Environmental Outcomes Reports') to replace the current EU-derived environmental assessment processes of Strategic Environmental Assessment and Environmental Impact Assessment.
- 3.9 Through the Levelling Up and Regeneration Bill, DLUHC are seeking to secure the necessary powers to bring forward a new domestic framework for all the environmental assessment regimes which originate from the EU Environmental Impact Assessment Directive (EIA) and Environmental Assessment of Plans and Programmes (Strategic Environmental Assessment or SEA) Directive. These reforms will ensure the value and rigour of environmental assessment is retained whilst allowing us to push for better environmental outcomes.

3.10 The government is analysing the feedback received from this consultation. Therefore, currently the current system remains unchanged.

Equalities Impact Assessment

- 3.11 The public sector Equality Duty (section 149 of the Equality Act) came into force on 5 April 2011. The Equality Duty applies to public bodies and requires consideration of how different people will be affected by their activities, helping them to deliver policies and services which are efficient and effective; accessible to all; and which meet different people's needs.
- 3.12 An EIA will help to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between people. The EIA will consider these aims and 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.
- 3.13 The EIA is addressed through the Oldham Impact Assessment tool. A tool that has been developed by Oldham Council to assess the impact of relevant policies, programmes and decisions on equalities characteristics as well as our corporate priorities and the Future Oldham aims.
- 3.14 As stated above, the Impact Assessment Tool helps to ensure the decisions made within Oldham Council fit with the council's visions and priorities within the council's Corporate Plan and 'Our Future', a plan developed with partners. It also helps the Council to treat residents (and non-residents) fairly, assessing the impact of decisions on different groups of people with protected characteristics.
- 3.15 The Impact Assessment Tool was completed by planning policy. The outcome of the assessment is summarised in section 7 and the full findings are contained within Appendix 18 of the IA (2023).
- 3.16 This IA also includes an objective relating to inclusive communities.

Health Impact Assessment

- 3.17 The role of the HIA is to assess the potential health and well-being impacts of the Local Plan.
- 3.18 The HIA has been undertaken by the planning policy team at Oldham Council, making use of the London Healthy Urban Development Units (HUDU): Rapid Health Impact Assessment Tool.

3.19 The HIA can be seen in Appendix 19 and a summary is contained within section 7 of this IA.

Habitats Regulations Assessment

- 3.20 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 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.
- 3.21 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.
- 3.22 The HRA of the Local Plan review has been prepared by Greater Manchester Ecology Unit. The findings of the HRA have been integrated into the IA.
- 3.23 A summary of the HRA is contained within section 7 of this IA and the full HRA can be seen in Appendix 20.

4 Integrated Assessment Process

- 4.1 The council has undertaken the IA internally, with the exception of the HRA, and has referred to guidance contained in A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005) with regards to carrying out the IA (incorporating SA/SEA). Although this guidance was prepared some time ago it is still considered to be very useful in setting out the stages on IA and ensuring that the Strategic Environmental Assessment (SEA) Directive requirements are covered. The council has also referred to guidance in Planning Practice Guidance.
- 4.2 The stages of the IA are set out below.

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
- 2. Collect baseline information
- 3. Identify sustainability issues and problems
- 4. Develop the IA appraisal framework
- 5. 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
- 2. Develop the DPD options including reasonable alternatives
- 3. 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

DPD: SUBMIT DRAFT DPD AND SUPPORTING DOCUMENTS FOR INDEPENDENT EXAMINATION

DPD: OUTCOME OF EXAMINATION

1. Consider implications for SA/SEA compliance

DPD: LOCAL PLAN ADOPTED

STAGE E: POST ADOPTION REPORTING AND MONITORING

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

- 4.3 This IA report is Stage B of the IA process. It has appraised the vision, plan objectives, draft policies and site allocations in the Draft Plan stage of the Local Plan review.
- 4.4 A summary of the Scoping Report (Stage A) is included below.

Scoping Report

- 4.5 A Scoping Report has been produced as part of the Integrated Assessment (IA) of Oldham's Local Plan review (stage A). It was first prepared in 2017 as part of the Regulation 18 consultation and was updated for the Issues and Options stage (Update 1) in July 2021. The Scoping report has been updated (Update 2) for the Draft Plan stage.
- 4.6 The Scoping Report has:
 - Identified other relevant policies, plans and programmes, and sustainability objectives
 - Collected baseline information
 - Identified sustainability issues and problems
 - Developed the IA framework
- 4.7 Consultation has taken place on each version of the Scoping Report and amendments have been made in response to these comments where appropriate. The comments made and changes to the Scoping Report are outlined in each update version of the Scoping Report.

Table 1: Key changes to IA Scoping Report

Scoping Report Version	Date	Local Plan version	Key changes made to Scoping Report
Original Scoping Report	2017	Regulation 18 Notification	In response to the original scoping report update 1 was amended to respond to key points raised: In response to Historic England more information was added on the historic environment, the importance of local character and identity and cultural heritage within the issues section. Landscape was separated out from the historic environment. Landscape character types were added to the baseline and the IA objectives and indicators were updated.
			An advice note on Inland waterways was incorporated into appendix 1 to address Canal and River Trust comments and the contribution that waterways network can have was noted. The improvement of footpaths and cycle routes was also incorporated. It was also made clear that the canal is a historic asset. An IA objective on transport was amended and an indicator on sustainable transport modes added.

Scoping Report Version	Date	Local Plan version	Key changes made to Scoping Report
			In response to Natural England an ecological map was added, and the issues were expanded on ensuring ecological networks are not compromised. IA objectives on contaminated land and soil and transport were reworded. Additional indicators relating to biodiversity were added.
			In relation to Environment Agency comments text was added in relation to water quality, riparian development, green infrastructure and SUDS. IA objectives on biodiversity and water resources amended. Additional indicator added on water quality and SUDS indicator were amended.
			In relation to Lancashire Gardens Trust text was added regarding registered parks and gardens and preparation of a local list.
Scoping Report Update 1	July 2021	Local Plan Issues and Options	There were fewer comments requesting changes to the Scoping Report Update 1 as issues raised on the original Scoping Report had been addressed through Update 1.
			In relation to the main IA report the IA objectives have been numbered in the assessment tables for ease to address Historic England comments.
Scoping Report Update 2	December 2023	Draft Local Plan	Comments are invited on this document. The Scoping Report has been updated to reflect new / amended plans and programmes, updated the baseline information, and amended indicators and refined the assessment framework. Presentational changes have been made. No changes have been made to the IA objectives since Scoping Report Update 1.

^{4.8} A summary of each stage of the Scoping Report Update 2 is shown below.

Stage A1: Identify other relevant policies, plans and programmes, and sustainability objectives: Purpose of the task

- 4.9 The SEA Directive requires:
 - The "relationship (of the plan or programme) with other relevant plans and programmes" (Annex I(a))
 - "the environmental protection objectives, established at international, (European) Community or (national) level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I(e))
- 4.10 This stage is summarised in section 9 of the Scoping Report Update 2 and the review of plans and programmes is contained in Appendix 1 of the Scoping Report Update 1.

Stage A2: Collect baseline information

- 4.11 The SEA requires:
 - "relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"; and
 - "the environmental characteristics of areas likely to be significantly affected" (Annex I (b), (c)).
- 4.12 The purpose of collecting baseline information is to provide a basis to predict and monitor environmental effects. It also helps to identify environmental problems and alternative ways of dealing with them.
- 4.13 Annex I of the Directive lists aspects of the baseline to be considered but the IA can focus on those where significant effects are likely and make clear where other matters do not need to be addressed. The aspects of the baseline to be considered are:
 - Biodiversity;
 - Population;
 - Human health;
 - Fauna:
 - Flora;
 - Soil;
 - Water;
 - Air;
 - Climatic factors;
 - Material assets;
 - Cultural heritage, including architectural and archaeological heritage; and
 - Landscape.
- 4.14 Section 10 and Appendix 2 of the Scoping Report Update 2 covers this stage.

Stage A3: Identify sustainability issues and problems

- 4.15 The SEA requires:
 - Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC (Annex I (d)).

- 4.16 By identifying the sustainability problems through the identification of other relevant objectives (Appendix 1 of the Scoping Report) and collection of baseline information (Appendix 2 of the Scoping Report) a range of key issues are identified which help to define the IA objectives.
- 4.17 This section is summarised in section 11 and 12 in Scoping Report Update 2. A summary of the issues and problems is outlined below.

BIODIOVERSITY / FAUNA / FLORA / SOIL

4.18 There is a need to:

- protect and enhance biodiversity, geodiversity and ecological networks and a multifunctional green infrastructure network
- protect and enhance soils and remediate contaminated land

LANDSCAPES (AND TOWNSCAPES / DEISGN)

4.19 There is a need to:

- 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 (HISTORIC ENVIRONMENT)

4.20 There is a need to:

• protect, conserve and enhance the historic environment, including their wider settings and to preserve and conserve archaeological heritage

POPULATION

- 4.21 There is a need to ensure the needs of the future population are met through:
 - 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 need
 - promoting inclusive sustainable communities and community cohesion

4.22 In relation to population there is also a need to:

- 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

4.23 There is a need to:

- 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

4.24 There is a need to:

- · 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

4.25 There is a need to:

- 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

4.26 There is a need to:

- promote sustainable waste management through the waste hierarchy
- manage minerals sustainably

Stage A4: Develop the Integrated Assessment Framework

4.27 The SEA requires:

- "The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation (Annex I (e))"
- 4.28 The guidance explains that the IA objectives are a way of considering effects of the Local Plan and comparing the effects of alternatives. They serve a different purpose than the Local Plan objectives although they are very likely to overlap. IA objectives help to show whether the objectives of the plan are beneficial for the environment, to compare the environmental effects or alternatives or to suggest improvements.
- 4.29 The table in Appendix 3 of the Scoping Report Update 2 translates the identified issues into proposed IA objectives with corresponding indicators so that the issues and problems can be assessed and monitored.
- 4.30 The proposed IA objectives are set out below, which have been refined through consultation on the Scoping Report.

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 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

- 4.31 Section 17 of the Scoping Report Update 2 outlines the IA assessment approach for the vision, plan objectives, plan policies and site allocations, incorporating the IA objectives.
- 4.32 Scores were expressed as:

Key:

+++/ ++ = significantly positive

+ = positive

? = uncertain

-- = neutral

X = potentially negative

XX = potentially significantly negative

S = Short term (less than 5 years)

M = Medium Term (5 to 10 years)

L = Long term (over 10 years)

L = Local

CB = Cross boundary

P = Permanent

- 4.33 Each score is justified by commentary. The assessment also takes account of any significant environmental effects including secondary (indirect effects) and cumulative / synergistic (where effects interact to produce a total greater effect).
- 4.34 Any assumptions and uncertainties will also be expressed.

Stage A5: Consulting on the scope of the Integrated Assessment

- 4.35 The SEA requires:
 - "...The authorities...Which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes ...Shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report" (Article 5.4 and 6.3)
- 4.36 The council consulted the following three consultation bodies on the scope and level of detail in the IA Scoping Report. The consultation bodies are:
 - Historic England;
 - Natural England; and
 - Environment Agency.
- 4.37 The IA Scoping Report and Update 1 was also available for other organisations and the public to view and comment on. IA Scoping Report Update 2 will be available to comment

- on, alongside this IA and the Draft Local Plan document. Please see statement of availability for consultation details.
- 4.38 Scoping Report Update 1 (section 7) outlines the comments received on the original Scoping Report and how these have been considered.
- 4.39 Scoping Report Update 2 (section 7) outlines the comments received on the Scoping Report Update 1 and how these have been considered.
- 4.40 Please note that comments were also made on the indicators proposed as part of the Local Plan review. The council's response to those comments can be seen in the 'Issues and Options Response schedule'.

5: APPRAISAL OF LOCAL PLAN REVIEW

5.1 This IA is now looking at Stage B of the IA process as outlined below.

DPD: Production and consultation

IA Stages and tasks

Stage B: Developing and refining options and assessing effects

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

5.2 The SEA requires:

"...an environmental report shall be prepared in which the likely significant effects on
the environment of implementing the plan or programme, and reasonable alternatives
taking into account the objectives and the geographical scope of the plan or
programme, are identified, described and evaluated" (Article 5.1). Information to be
provided in the Environmental Report includes "an outline of the reasons for selecting
the alternatives dealt with" (Annex I (h))

Integrated Assessment Objectives

- 5.3 Stage A4 above outlines the IA objectives that have been used to assess the vision, plan objectives and draft policies of the Local Plan. They have also fed into the appraisal of site allocations.
- 5.4 Section 17 of the Scoping Report Update 2 sets out the approach to carrying out the IA using the objectives and the scoring system.
- 5.5 Overall conclusions have been made highlighting any changes needed to mitigate significant effects or to enhance positive effects. The HRA screening has been incorporated.
- 5.6 This IA report includes the outcomes of the IA of the Issues and Options for completeness (please see Scoping Report 1 for site assessment approach at this stage). It then summarises the outcomes of the IA appraisal of the Draft Local Plan.

6: IA APPRAISAL AT ISSUES AND OPTIONS STAGE

Stage B: Developing and refining options and assessing effects

- 1: Test the DPD objectives against the IA framework
- 2. Develop the DPD options including reasonable alternatives
- 3: Evaluate the likely effects of the DPD and alternatives
- 4: Consider ways of mitigating adverse effects and maximising beneficial effects

Vision and DPD objectives appraisal

- 6.1 An IA appraisal of the vision and each plan objective at Issues and Options was carried out.
- 6.2 The summary results of this are shown below. For the full appraisal please see the IA for the Issues and Options stage.

Vision

6.3 The vision in the Issues and Options scored a mixture of neutral, positives and significantly positive scores.

Table 2: IA of vision at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Vision	9	12	5	0	0	0
score						

Mitigating adverse effects

6.4 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects:

6.5 The vision was enhanced through the IA process with the inclusion of references to education facilities; mitigating, adapting and being resilient to climate change; multifunctional Green Infrastructure and the Nature Recovery Network; historic environment; townscapes; and accessible open spaces.

Plan Objectives:

- 6.6 The top line of each plan objective is included to give an indication of its content. For the full plan objective wording please see the Issues and Options Plan document.
- 6.7 The scores were considered the same for short to long term at this stage. The appraisal also has identified direct and secondary (indirect effects).

Plan Objective 1 Building quality homes to meet the local need and diversify the housing offer by

Table 3: IA of plan objective 1 at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Plan Objective 1	5	12	8	2	0	0
score			One neutral also had a ? giving a mixed	One ? also had a neutral giving a mixed		
			score	score		

Mitigating adverse effects

- 6.8 No adverse effects were identified therefore no mitigation was required.
- 6.9 IA objective 1 scored an uncertainty as the plan objective was screened in by the HRA and was therefore subject to further screening as the Local Plan developed through to Draft Plan stage. At this stage no mitigation was identified.
- 6.10 Another uncertain was the impact of the plan objective on economic growth, however the justification highlights that the objective is likely to have secondary indirect positive effects.

Maximising beneficial effects:

6.11 No enhancements identified. 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 by...

Table 4: IA of plan objective 2 at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Plan Objective 2	3	5	18	1	0	0
score			One of the neutral scores was a mixed	This ? is a mixed score with a neutral		

	score with		
	2.2		
	a ?		

Mitigating adverse effects

- 6.12 No adverse effects were identified therefore no mitigation was required.
- 6.13 IA objective 2 scored an uncertainty as the plan objective was screened in by the HRA and was therefore subject to further screening as the Local Plan developed through to Draft Plan stage. At this stage no mitigation was identified.

Maximising beneficial effects

6.14 The plan objective was enhanced by making reference to high quality suitable developments in relation to IA5, IA12, IA13, IA15 and IA16. The plan objective scored positively / significantly positive against 8 IA objectives where it would have a beneficial impact.

PO3 Providing opportunities to grow local businesses and create jobs by...

Table 5: IA of plan objective 3 at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Plan Objective 3 score	3	9	One of the neutral scores	This ? is a mixed score with a neutral	0	0
			was a mixed score with a ?			

Mitigating adverse effects

- 6.15 No adverse effects were identified therefore no mitigation was required.
- 6.16 IA objective 3 scored an uncertainty as the plan objective was screened in by the HRA and was therefore subject to further screening as the Local Plan developed through to Draft Plan stage. At this stage no mitigation was identified.

Maximising beneficial effects

- 6.17 The plan objective was enhanced by making reference to supporting the expansion of green technologies in relation to IA12 and IA13 and connectivity to an integrated transport system in relation to IA16.
- 6.18 The plan objective scored positively / significantly positive against 12 IA objectives where it would have a beneficial impact.

PO4 Supporting thriving Town Centres by...

Table 6: IA of plan objective 4 at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Plan Objective 4 score	10	9	7	This? is mixed score with a ++		0

Mitigating adverse effects

6.19 No adverse effects were identified therefore no mitigation was required.

6.20 IA objective 4 scored an uncertainty as the plan objective was screened in by the HRA and was therefore subject to further screening as the Local Plan developed through to Draft Plan stage. At this stage no mitigation was identified.

Maximising beneficial effects

6.21 No enhancements were identified. The plan objective scored positively / significantly positive against 19 IA objectives where it would have a beneficial impact.

PO5 Ensuring Oldham is a greener borough by...

Table 7: IA of plan objective 5 at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Plan Objective 5 score	15	7	4	0	0	0

Mitigating adverse effects

6.22 No adverse effects were identified therefore no mitigation was required.

Maximising beneficial effects

6.23 No enhancements were identified. The plan objective scored positively / significantly positive against 22 IA objectives where it would have a beneficial impact.

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

Table 8: IA of plan objective 6 at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Plan	7	10	9	0	0	0
Objective 6						
score						

Mitigating adverse effects

6.24 No adverse effects were identified therefore no mitigation was required.

Maximising beneficial effects

6.25 No enhancements were identified. The plan objective scored positively / significantly positive against 17 IA objectives where it would have a beneficial impact.

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

Table 9: IA of plan objective 7 at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Plan Objective 7 score	One of the ++ was a mixed score with a?	6	11	This? is a mixed score with a ++	0	0

Mitigating adverse effects

6.26 No adverse effects were identified therefore no mitigation was required.

6.27 IA objective 7 scored an uncertainty as the plan objective was screened in by the HRA and was therefore subject to further screening as the Local Plan developed through to Draft Plan stage. At this stage no mitigation was identified.

Maximising beneficial effects

6.28 No enhancements were identified. The plan objective scored positively / significantly positive against 15 IA objectives where it would have a beneficial impact.

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

Table 10: IA of plan objective 8 at Issues and Options stage

Scoring system	++	+	-	?	X	XX
Plan Objective 8	5	14	7	0	0	0
score						

Mitigating adverse effects

6.29 No adverse effects were identified therefore no mitigation was required.

Maximising beneficial effects

6.30 No enhancements were identified. The plan objective scored positively / significantly positive against 19 IA objectives where it would have a beneficial impact.

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

Table 11: IA of plan objective 9 at Issues and Options stage

Scoring system	++	+	1	?	X	XX
Plan Objective 9	4	12	10	0	0	0
score						

Mitigating adverse effects

6.31 No adverse effects were identified therefore no mitigation was required.

Maximising beneficial effects

6.32 No enhancements were identified. The plan objective scored positively / significantly positive against 16 IA objectives where it would have a beneficial impact.

DPD Options: Spatial Options

- 6.33 At Issues and Options stage, several spatial options were assessed including reasonable alternatives.
- 6.34 The likely effects of each of these options / alternatives were assessed and any mitigation / enhancements to maximise beneficial effects were outlined.
- 6.35 The scores were considered the same for short to long term at this stage. The appraisal also has identified direct and secondary (indirect effects).

Affordable Housing

Table 12: IA of Affordable Housing Spatial Options at Issues and Options stage

Spatial option	Appraisal summary	Amendments made to option as a result of the IA
Affordable Housing Option	++ (2)	N/A. At this point draft policy
A: Should an affordable	+ (4)	wording was not available.
housing requirement be	(20)	
applied borough-wide?	? (0)	
	X (0)	
	Xx (0)	
Affordable Housing Option	++ (4)	N/A. At this point draft policy
B: Should there be a	+ (2)	wording was not available.
different affordable housing	(20)	
requirement for different	?	
parts of the borough,	X	
depending on their need?	Xx	

- 6.36 Spatial Option B (targeted approach to affordable housing) resulted in more significantly positive outcomes and therefore potentially greater beneficial effects overall than Spatial Option A (boroughwide approach).
- 6.37 No adverse effects were identified therefore no mitigation was required.

Homes in Multiple Occupation

Table 13: IA of Homes in Multiple Occupation Spatial Options at Issues and Options stage

Spatial option	Appraisal summary	Amendments made to option as a result of the IA
HMO Option A: If there is found to be a concentration of HMOs within a particular area, would you agree with the introduction of an Article	++ (0) + (6) (20) ? (0) X (0)	N/A. At this point draft policy wording was not available.
4 direction to remove permitted development rights for HMOs in specific areas, as necessary?	Xx (0)	
HMO Option 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?	++ (0) + (6) (20) ? (0) X (0) Xx (0)	N/A. At this point draft policy wording was not available.

6.38 The IA appraisal for HMO Spatial Options A and B both scored the same. No adverse effects were identified therefore no mitigation was required.

Housing Allocations:

Table 14: IA of Housing Allocations Spatial Options at Issues and Options stage

Spatial option	Appraisal summary	Amendments made to option as a result of the IA
Option 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 reuse of employment sites and mills, where appropriate)?	++ (8) + (11) -(7) ? (2) X (0) Xx (0) Option scored a couple of uncertainties as townscape, distinctiveness and the historic environment will need to be managed in relation to scale of development.	N/A. At this point draft policy wording was not available to suggest mitigation.
Option 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.	++ (2) + (14) -(8) ? (12) X (1) Xx (0) Option scored several uncertainties as townscape, distinctiveness and the historic environment and other considerations will need to be managed in relation to scale of development and any necessary mitigation. Health was a potentially negative score as open land may be used for recreation.	N/A. At this point draft policy wording was not available to suggest mitigation.

^{6.39} The IA of the housing allocation options showed at this stage generally there were more uncertainties around Option B, whilst Option A scored more positive overall.

^{6.40} Any uncertainties and potential adverse impacts would need to be further appraised and mitigated where required, for either option.

Employment Allocations

Table 15: IA of Employment Allocations Spatial Options at Issues and Options stage

Spatial Option	Appraisal summary	Amendments made to option as a result of the IA
Option A: To focus more on the connectivity to our existing employment sites and neighbouring districts key employment sites.	++ (5) + (15) -(5) ? (1) X (0) Xx (0)	The spatial option was enhanced in the Issues and Options Report as a result of the IA by making reference to sustainable connectivity.
	Option scored uncertain for local environmental quality as each site would need to be assessed.	At this point draft policy wording was not available to identify further mitigation or enhancements.
Option B: A combination of providing some new employment land and improving connectivity to existing and neighbouring districts key employment sites	++ (3) + (17) -(5) ? (10) X (0) Xx (0)	The spatial option was enhanced in the Issues and Options Report as a result of the IA by making reference to sustainable connectivity.
Silco.	Option scored several uncertainties as the location of development was not known to assess impacts on green infrastructure and the wider natural and built environment.	At this point draft policy wording was not available to identify further mitigation or enhancements.

^{6.41} The IA of the employment allocation options shows that Option A scores more significantly positive scores. Whereas at this stage there are more uncertainties with Option B, which if taken forward would need further assessment and mitigation may be required.

^{6.42} The spatial options were enhanced by making reference to sustainable connectivity in relation to IA14.

Health and Well Being

Table 16: IA of Health and Well Being Spatial Options at Issues and Options stage

Spatial option	Appraisal summary	Amendments made to option as a result of the IA
Option A: Should there be a policy which restricts the location of hot food takeaways within 400m of a school?	++ (0) + (4) -(22) ? (0) X (0) Xx (0)	N/A. At this point draft policy wording was not available.
Option B: Should there be a policy which restricts the location of hot food takeaways in areas with high levels of obesity?	++ (1) + (3) -(22) ? (0) X (0) Xx (0)	N/A. At this point draft policy wording was not available.
Option 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?	++ (3) + (1) -(22) ? (0) X (0) Xx (0)	N/A. At this point draft policy wording was not available.

6.43 The IA of Option A, B and C scored neutral against most IA objectives. However, 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 results in potentially greater beneficial effects overall.

5: Propose measures to monitor the significant effects of implementing the DPD

6.44 The IA indicators have been established through Stage A of the IA process (Scoping Report) and have been amended in response to consultation responses. At Issues and Options stage these were set out within Section 15 of the Scoping Report Update 1.

Equalities Impact Assessment of Issues and Options Stage

- 6.45 The Equalities' Impact Assessment (EIA) that was carried out on the Issues and Options plan document is contained within Appendix 1 in the IA (2021).
- 6.46 The overall impact of the Issues and Options on groups and communities was considered to be 'None / Minimal'.
- 6.47 It was concluded that a full EIA assessment was not required.
- 6.48 In coming to the decision, it was considered that the Local Plan Issues and Options should have a positive impact on members of public from different age groups, ethnic backgrounds and those on lower incomes as it draws on a large evidence base including Sustainability Appraisals, council statistics, public consultation and monitoring to identify the planning issues facing Oldham.
- 6.49 The Issues and Options seeks to provide options that aim to improve the lives of all residents and groups in Oldham. For example, the Local Plan may have a positive impact on

different age groups and those on lower incomes by setting out how the council will provide a range of housing to meet their needs. It seeks to improve local public transport and walking and cycling connections and make sure there is a range of accessible employment opportunities. It also plans to safeguard and improve the local natural environment which would again benefit all people in Oldham through improved air quality for example.

Health Impact Assessment at Issues and Options Stage

6.50 The Health Impact Assessment (HIA) Screening that was carried out on the Issues and Options plan document is contained within Appendix 2 in the IA (2021).

6.51 An Assessment of each plan objective was carried out. The HIA showed a positive response overall in relation to the plan objectives.

Habitats Regulations Assessment at Issues and Options Stage

6.52 A separate Habitats Regulations Assessment (HRA) on the Issues and Options was prepared by Greater Manchester Ecology Unit (GMEU). A summary was provided in Section 11 of the Issues and Options IA.

6.53 The HRA Screening of Issues and Options screened the plan including the vision and plan objectives.

6.54 The parts of the Plan which could cause harmful Effects, and which have been Screened in, were:

- Plan Objectives 1, 2, 3, 4 and 7.
- Issues and Options on Homes, Economy and Employment, Centres and Infrastructure.

6.55 The HRA noted the need to carry out further screening and possible assessment as the Local Plan progresses.

Difference the IA has made to the Draft Local Plan

6.56 Scoping Report Update 1 and Update 2 both include details of the comments received on the previous Scoping Report and the council's response to those comments and any amendments made.

6.57 The IA at Issues and Options Stage outlines enhancements to maximise positive benefits were made to the vision, plan objectives 2 and 3 and the spatial option on employment allocations within the Issues and Options Report.

6.58 The IA process has considered options and reasonable alternatives (spatial options).

6.59 The options that were presented were in relation to policy areas and allocations and these were the reasonable alternatives to the approach taken in the Draft Local Plan. Comments received on the Issues and Options were taken into account when drafting the preferred policies. However, no other reasonable alternatives were proposed as part of the consultation.

6.60 Below is a summary of the options, the outcome of the IA process and how the options have informed the preferred approach.

Table 17: Assessment of options (including reasonable alternatives) and how this has led to the preferred option

Spatial Option	IA results from Issues and Options stage of options and reasonable alternatives	How this has informed the draft plan policy
Affordable Housing Option A: Should an affordable housing requirement be applied borough-wide? Affordable Housing Option B: Should there be a different affordable housing requirement for different parts of the borough, depending on their need?	alternatives Option B (targeted approach to affordable housing) results in more positive outcomes overall than Option A (boroughwide approach).	The preferred approach is outlined in the Draft Local Plan in Policy H7 Affordable Housing. Option B scored higher in the Issues and Options IA and this option has been taken forward as the preferred approach. The policy has set out three zones which reflect different value areas. Within each of these value areas different affordable housing requirements are required. Option A has not been taken forward as this does not lead to as many positive impacts as Option B.
		In the IA of the Draft Local Plan this proposed policy has scored neutral, positives and significantly positives scores.

Spatial Option	IA results from Issues and	How this has informed the
	Options stage of options and reasonable	draft plan policy
	alternatives	
Homes in Multiple Occupation (HMO)	The IA appraisal for Homes in Multiple Occupation	The approach to HMOs is outlined in the Draft Local
	(HMO) Spatial Options A	Plan Policy H10 Houses in
If there is found to be a	and B both scored the	Multiple Occupation.
concentration of HMOs within a particular area,	same.	The IA did not indicate a
would you agree with the		stronger performing option.
introduction of an Article 4		
direction to remove		The draft policy sets out criteria for Houses in
permitted development rights for HMO:		Multiple Occupation (HMOs)
		to meet. In addition,
Option A in specific areas,		permission will not be granted where the
as necessary?; or		proportion of HMOs result in
Option B: boroughwide?		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.
		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.
		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.
		The IA on the preferred
		option – the draft plan policy

Spatial Option	IA results from Issues and Options stage of options and reasonable alternatives	How this has informed the draft plan policy
		scored a mixture of neutral, positive and significantly positive scores.
Option 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 reuse of employment sites and mills, where appropriate)?	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.	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.
Option 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.		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.
		The approach of Option B is reflected in the potential housing allocations proposed in Draft Local Plan Policy H1 – Housing and Mixed-Use Allocations. The focus of the potential allocations is on brownfield land, particularly opportunities within Oldham Town Centre. Whilst

Spatial Option	IA results from Issues and Options stage of options and reasonable alternatives	How this has informed the draft plan policy
		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. Option A was therefore not solely taken forward as it would not in itself provide the same range of allocations.
Employment Allocations Option A: To focus more on the connectivity to our existing employment sites and neighbouring districts key employment sites. Employment Allocations Option B: A combination of providing some new employment land and improving connectivity to existing and neighbouring districts key employment sites.	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.	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.
Health and Wellbeing - Should there be a policy which restricts the location of hot food takeaways: Option a. within 400m of a school; or Option b. in areas with high levels of obesity; or Option c. both?	Option A, B and C scored neutral against most IA objectives. However, 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.	The preferred approach is outlined in the Draft Local Plan Policy CO8 Hot Food Takeaways. 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.

Spatial Option	IA results from Issues and Options stage of options and reasonable alternatives	How this has informed the draft plan policy
		(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).
		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.
		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.
		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.
		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.

7. IA APPRAISAL OF DRAFT PLAN

- 7.1 The IA of the Draft Local Plan repeats Stage B. It has:
- 1: Tested the DPD objectives against the IA framework
- 3: Evaluated the likely effects of the DPD and alternatives
- 4: Considered ways of mitigating adverse effects and maximising beneficial effects
- 7.2 However, the developing DPD options including reasonable alternatives (task 2) task has already been completed as part of the Issues and Options stage, so this task is not repeated again.
- 7.3 Instead, the Draft Local Plan presents the preferred spatial options in the form of draft policies which have resulted from the spatial options.

Vision and DPD objectives appraisal

- 7.4 An IA appraisal of the vision and each plan objective at Draft Local Plan stage has been carried out.
- 7.5 The summary results of this are shown below. For the full appraisal please see Appendix 1 in the IA for the Draft Local Plan.

Vision

7.6 The vision in the Draft Local Plan scored a mixture of neutral, positives and significantly positive scores.

Table 18: IA of vision at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX	
Vision	17	7	2	0	0	0	
score							

Mitigating adverse effects

7.7 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects:

- 7.8 No enhancements were identified to the vision. The vision scored positively / significantly positive against 24 IA objectives where it would have a beneficial impact.
- 7.9 In comparison to the vision at Issues and Option stage where the vision scored positively against 21 IA objectives and enhancements were made, the vision at draft plan stage has resulted in more positive scores.

Plan Objectives:

- 7.10 The top line of each plan objective (PO) is included to give an indication of the content of each plan objective. For the full plan objective wording please see the Draft Local Plan document or IA Appendix 2.
- 7.11 The scores were considered the same for short to long-term at this stage. The appraisal also has identified direct and secondary (indirect effects).

PO1 Building quality homes to meet local needs and diversify the housing offer by...

Table 19: IA of plan objective 1 at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX
Plan	5	12	9	0	0	0
Objective 1 score						

Mitigating adverse effects

7.12 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects:

- 7.13 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.
- 7.14 In comparison to the housing plan objective at Issues and Option stage where the objective scored positively against 18 IA objectives, plan objective 1 at Draft Local Plan stage has resulted in one more neutral score. This is as a result of reflecting on the objective further.

PO2 Providing opportunities to learn and gain new skills by:

Table 20: IA of plan objective 2 at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX
Plan Objective 2 score	4	4	18	0	0	0

Mitigating adverse effects

7.15 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects:

7.16 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.

- 7.17 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'.
- 7.18 The plan objective is not comparable to the plan objective at Issues and Options stage due to the objective on education at Issues and Options stage being split between two plan objectives (PO2 and PO7) and merged with other plan objective aims.

PO3 Boosting northern competitiveness by providing access to employment opportunities and growing local businesses by:

Table 21: IA of plan objective 3 at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX
Plan	3	10	13	0	0	0
Objective 3						
score						

Mitigating adverse effects

7.19 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects:

- 7.20 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.
- 7.21 In comparison to plan objective 3 at Issues and Options stage the IA objective has scored one more positive.

PO4 Supporting the regeneration of Oldham Town Centre and creating thriving centres by:

Table 22: IA of plan objective 4 at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX
Plan Objective 4	12	11	3	0	0	0
score						

Mitigating adverse effects

7.22 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects:

7.23 No enhancements were identified to plan objective 4. The plan objective scored positively / significantly positive against 23 IA objectives where it would have a beneficial impact.

7.24 In comparison to plan objective 4 at Issues and Options stage the IA objective has scored four more positives.

PO5 Protecting and enhancing Oldham's landscapes by:

Table 23: IA of plan objective 5 at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX
Plan Objective 5	12	7	7	0	0	0
score						

Mitigating adverse effects

7.25 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects:

7.26 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.

7.27 The plan objective is not comparable to the objective at Issues and Options stage as objective 5 regarding the borough's environment has been split into two so that the objectives are clearer and better defined. Objective 5 now deals with the borough's landscape and objective 6 deals with protecting, restoring and enhancing the natural environment.

PO6 Protecting, restoring and enhancing the natural environment by:

Table 24: IA of plan objective 6 at Draft Local Plan stage

Scoring	++	+	-	?	Х	XX
system						
Plan Objective 6	12	11	3	0	0	0
score						

Mitigating adverse effects

7.28 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects

7.29 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.

7.30 The plan objective is not comparable to the objective at Issues and Options stage as since the IA of the Issues and Options, Objective 5 regarding the borough's environment has been split into two, so that the objectives are clearer and better defined. Objective 5 now deals with the borough's landscape and objective 6 deals with protecting, restoring and enhancing the natural environment.

PO7 Promoting sustainable development that mitigates and adapts to climate change by:

Table 25: IA of plan objective 7 at Draft Local Plan stage

Scoring system	++	+	-	?	Х	XX
Plan	9	8	9	0	0	0
Objective 7						
score						

Mitigating adverse effects

7.31 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects

7.32 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. This is the same number of positive scores for the plan objective (PO6) at Issues and Options stage.

PO8 Uplifting the health and well-being of our residents and local communities by:

Table 26: IA of plan objective 8 at Draft Local Plan stage

Scoring	++	+	-	?	X	XX
system						
Plan	9	11	6	0	0	0
Objective 8						
score						

Mitigating adverse effects

7.33 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects

7.34 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.

7.35 The revised plan objective scores five more positives than the plan objective (PO7) at Issues and Options stage.

PO9 Improving and valuing a better built environment, by:

Table 27: IA of plan objective 9 at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX
Plan	6	10	10	0	0	0
Objective 9						
score						

Mitigating adverse effects

7.36 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects

7.37 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.

7.38 The revised plan objective scores three fewer positives than the plan objective (PO8) at Issues and Options stage. This may be due to the plan objectives at Issues and Options stage being more detailed. At Draft Local Plan stage they have been refined further.

PO10 Promoting accessible and sustainable transport choices, by:

Table 28: IA of plan objective 10 at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX
Plan	9	6	11	0	0	0
Objective						
10 score						

Mitigating adverse effects

7.39 No adverse effects were identified therefore no changes were required to mitigate adverse effects.

Maximising beneficial effects

7.40 No enhancements were identified to plan objective 10. The plan objective scored positively / significantly positive against 15 IA objectives where it would have a beneficial impact.

7.41 The revised plan objective scores one fewer positive than the plan objective (PO9) at Issues and Options stage. This may be due to further consideration.

Plan Policies Appraisal

7.42 Each plan policy in the Draft Local Plan has been appraised. The full IA appraisal can be seen in Appendix 3 to 16, which also shows whether effects are temporary (T) or permanent (P) and local (L) or cross boundary (CB) (cross boundary was assumed to include local effects too).

7.43 A summary of the appraisal is given below. The long-term scores have been shown below for ease, however the 'variation in scores' notes where there may have been any differences in scores over the short to long-term. For short-and medium-term scores please see the full IA appraisal in the appendix. The variation in scores also notes any mixed scores.

7.44 Any mitigation and / or enhancements are also shown where the policy wording was amended as a result of the IA.

7.45 However, generally mitigation is provided through other plan policies either in Places for Everyone (PfE) or those in Draft Local Plan as the plan should be read as a whole.

7.46 Examples of the policies that would help provide mitigation have been expressed in the full IA in the relevant appendix.

Homes

Table 29: IA of Homes policies at Draft Local Plan stage

Scoring system	++	+		?	X	ХХ	Variations in score	Mitigation	Enhancement
Policy H1: Delivering a Diverse Housing Offer	5	7	13	0	1	0	None	A negative score was given as sites in the housing land supply could include open spaces. Mitigation would be provided through Policy CO1. 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	None
Policy H2: Housing Mix	4	9	14	0	0	0	None	significant effects. 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	None

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
								mitigation measures to address likely significant effects.	
Policy H3: Density of New Housing	3	10	12	0	0	0	None	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	4	7	15	0	0	0	None	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 5: Homes for Disabled People	4	6	16	0	0	0	None	The HRA has screened the policy as additional houses could result in increases in population, resulting in increased air pollution (from road	In relation to IA17 the IA identified that the policy reasoned justification could reference accessibility to key services and public transport to improve effectiveness.

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
								traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.	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	3	9	14	0	0	0	None	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 H7: Affordable Housing	4	4	18	0	0	0	None	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 H8: Vacant Building Credit	3	7	16	0	0	0	None	None	None

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy 9: Rural Exception Sites	2	1	17	6	1	0	There was a mixed score of +/? against IA 18 (regeneration)	A negative score was given as rural exception sites are likely to be in the Green Belt and possibly including greenfield sites. However, policy OL2 would need to be met. 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 H10: Houses in Multiple Occupation	3	8	15	0	0	0	None	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

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy H11: Custom / Self-Build and Community-led Housing	2	4	20	0	0	0	None	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 H12: Gypsies, Travellers and Travelling Showpeople	3	4	19	0	0	0	None	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 H13: Housing and Mixed-Use Allocations	5	9	9	3	2	0	A X/? score was given against IA 1(green infrastructure) and a +/? score was given for IA11 (soil) due to loss of soil / green	No mitigation required as Policies N1 to N3 and CO1 mitigates loss of open space. The HRA has screened the policy as additional houses could result in increases in population,	None

Scoring system	++	+	 ?	X	XX	Variations in	Mitigation	Enhancement
						score		
						infrastructure as	resulting in increased	
						some sites may	air pollution (from road	
						include greenfield	traffic) and recreational	
						sites / open	disturbance effects.	
						space.	The HRA identifies	
							mitigation measures to	
							address likely	
							significant effects.	

Economy and Employment

Table 30: IA of Economy and Employment policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy E1 – Business and Employment Areas	5	4	17	0	0	0	None	The HRA has screened the site in as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows). There may also be possible direct impacts on the Rochdale Canal SAC from development within 200m of the Canal.	None
								The HRA has also screened in Business Employment Areas (BEAs) (which this policy relates to) as they could result in increased road traffic resulting in increases in air pollution. In addition, Hollinwood Business District; Wrigley Street and Greengate / Broadgate BEAs are close to the Rochdale Canal SAC (within 200m) and	

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
								development could result in direct impacts on the Canal.	
								The HRA identifies mitigation measures to address likely significant effects.	
Policy E2 – Exceptions within Business and Employment Areas and other existing employment sites	2	3	20	1	0	0	None	The HRA has screened the site in as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows). There may also be possible direct impacts	None
								on the Rochdale Canal SAC from development within 200m of the Canal. The HRA identifies	
								mitigation measures to address likely significant effects.	
Policy E3 – Reuse and redevelopment of Mill Buildings	3	2	21	0	0	0	None	The HRA has screened the site in as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows).	None

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
								There may also be possible direct impacts on the Rochdale Canal SAC from development within 200m of the Canal.	
								The HRA identifies mitigation measures to address likely significant effects.	
Policy E4 – Office, Industry and Warehousing Allocations	4	1	20	1	0	0	None	The HRA has screened the policy in due to possible impacts on European sites arising from air pollution effects.	None
								There may also be possible direct impacts on the Rochdale Canal SAC from development within 200m of the Canal.	
								The HRA identifies mitigation measures to address likely significant effects.	

Tourism

Table 31: IA of Tourism policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy TM1 – Tourism	8	8	10	0	0	0	None	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	2	4	19	1	0	0	None	None	None

Centres

Table 32: IA of Centres policies at Draft Local Plan stage

Scoring system	++	+		?	Х	XX	Variations in score	Mitigation	Enhancement
Policy C1 – Our Centres	6	7	13	0	0	0	None	None	None
Policy C2 – Local Services and Facilities	3	6	17	0	0	0	None	None	None
Policy C3 – Retail and Leisure Impact Assessments and Sequential Tests	4	6	16	0	0	0	None	None	None
Policy C4 – Changes of use and redevelopment within the borough's centres	7	6	13	0	0	0	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

Table 33: IA of Oldham Town Centre policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy OTC1: Oldham Town Centre	14	9	3	0	0	0	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.	None	None
Policy OTC2: Protecting and Enhancing Oldham Town Centre Conservation Area	8	10	8	0	0	0	None	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	12	4	10	0	0	0	None	None	None

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Oldham Town Centre									
Policy OTC4 - Green Infrastructure within and around Oldham Town Centre	11	9	6	0	0	0	None	None	None
Policy OTC5 - Creating better vehicular parking and drop off facilities in Oldham Town Centre	7	2	17	0	0	0	None	None	None

Addressing Climate Change

Table 34: IA of Addressing Climate Change policies at Draft Local Plan stage

Scoring system	++	+		?	X	ХХ	Variations in score	Mitigation	Enhancement
Policy CC1 – Sustainable Construction, Energy Efficiency and Retrofitting	8	6	13	0	0	0	IA8 (health), IA14 (air quality) and IA18 (regeneration and disparity) scored + in the short term to ++ in the long time.	None	None
Policy CC2 Renewable & Low Carbon Energy	4	9	13	0	3	0	Mixed scores of/x were given against IA2 (open space) and IA11 (soil) as the policy partially met the objective. IA24 also scored/x as minerals is not included within the criteria. IA18 (energy) scored + in the short term to ++ in the long term.	For IA2 the policy was mitigated by ensuring that open space is included within the criteria. For IA11 the policy was mitigated by ensuring that loss of high-quality soil and agricultural land was included within the criteria. For IA24 a new criterion referring to Minerals Safeguarding Areas has been added.	None
Policy CC3 - Managing Flood Risk	5	7	14	0	0	0	None	None	None

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy CC4 - Sustainable Drainage – Foul and Surface Water	4	7	15	0	0	0	None	None	None
Policy CC5 - Water Efficiency	2	7	17	0	0	0	None	None	None
Policy CC6 Groundwater Source Protection Zones	1	3	22	0	0	0	None	None	None

Natural Environment and Open Land

Table 35: IA of Addressing Natural Environment and Open Land policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy OL1 Consideration for the Peak District National Park	0	8	17	0	1	0	None	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	3	14	8	2	1	0	IA12 (energy) scored a mixed score of X/? as the policy could constrain some types of low carbon energy in the Green Belt. IA16 scored a mixed score of +/? As the policy may enhance the Green Belt including walking and cycling routes but specific	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

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
							improvements are not identified.		
Policy OL3 Extensions and alterations to existing buildings within the Green Belt	0	4	22	0	0	0	None	None	For clarity, in relation to IA4 design was mentioned twice in the policy criterions and therefore to remove repetition reference to design was removed form criterion 1.
Policy OL4 Local Green Space	6	12	8	0	0	0	None	None	None
Policy OL5 Protecting dark skies and tranquillity	3	6	17	0	0	0	None	None	None

Addressing the Biodiversity Emergency

Table 36: IA of Addressing the Biodiversity Emergency policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy N1 Protecting Nature	4	8	14	0	0	0	None	None	None
Policy N2 Restoring Nature	8	5	12	1	0	0	None	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	12	9	5	0	0	0	IA13 (resilience) scores + in the short term to ++ in the long term.	None	None
Policy N4 Tree Replacement	2	9	15	0	0	0	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	None	None

Scoring system	++	+	 ?	Х	XX	Variations in	Mitigation	Enhancement
						score		
						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.		

Oldham's Historic Environment

Table 37: IA of Oldham's Historic Environment policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy HE1 – The Historic Environment	7	10	9	0	0	0	None	None	None
Policy HE2 Securing the Preservation and Enhancement of Oldham's Heritage Assets	6	10	10	0	0	0	None	None	None
Policy HE3 Development proposals affecting conservation areas	6	6	14	0	0	0	IA20 (centres) scored + in the short term to ++ in the medium and long term as conservation areas should be enhanced over time).	None	None
Policy HE4 Oldham's Mills	7	6	13	0	0	0	None	None	None
Policy HE5 Canals	6	9	11	0	0	0	None	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

Table 38: IA of Creating a Better and Beautiful Oldham policies at Draft Local Plan stage

Scoring system	++	+	-	?	X	XX	Variations in score	Mitigation	Enhancement
Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development	17	1	8	0	0	0	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).	None	None
Policy D2 – A Design Led Approach to Non- Residential, Commercial and Employment Developments	15	1	10	0	0	0	Effects increase from + to ++ over time against IA1 (green infrastructure); IA7 (infrastructure; IA8 (health); IA9 (flood risk); IA13 (climate change); IA17 infrastructure; and IA18 (regeneration);	None	None

Scoring system	++	+	-	?	Х	XX	Variations in score	Mitigation	Enhancement
Policy D3 - Design Scrutiny	15	2	9	0	0	0	Effects increase from + to ++ over time against IA1 (green infrastructure); IA2 (open spaces); IA7 (infrastructure; IA12 (energy); IA13 (climate change); and IA16 (transport).	None	None
Policy D4 – Creating Better Views, Gateways and Taller Buildings	7	1	18	0	0	0	Effects increase from + to ++ over time against IA17 infrastructure; and IA18 (regeneration); IA 20 (centres); and IA26 (inclusive communities).	None	None
Policy D5 – Improving the Quality of Advertisements and Signage in Oldham	4	0	22	0	0	0	Effects increase from + to ++ over time against IA 20 (centres); and IA26.	None	None
Policy D6 – Creating a Better Public Realm in Oldham	12	4	10	0	0	0	Effects increase from + to ++ over time against IA9 (flood risk); IA13 (climate change); and IA14 (air quality).	None	None

Scoring system	++	+	-	?	X	XX	Variations in	Mitigation	Enhancement
							score		
Policy D7 -	5	1	20	0	0	0	None	None	None
Development within									
the curtilage of a									
dwellinghouse									

Creating a Sustainable, Active, Accessible Network for Oldham

Table 39: IA of Creating a Sustainable, Active, Accessible Network for Oldham policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy T1 – Delivering Oldham's Transport Priorities	11	3	12	0	0	0	None	None	None
Policy T2 – Creating Sustainable Streets	15	2	9	0	0	0	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).	None	None
Policy T3 – Car Parking Standards in Oldham	11	1	14	0	0	0	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	None	None

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
							(access to key services); IA20 (centres); IA21 (tourism); and IA26 (inclusive communities).		
Policy T4 – Providing for electric vehicle charging points	5	1	20	0	0	0	Effects increase from + to ++ over time against IA7 (infrastructure); IA15 (local environmental quality); and IA16 (sustainable transport).	None	None
Policy T5 – Transport Statements, Assessments and Travel Plans in New Development	9	1	16	0	0	0	None	None	None

Communities

Table 40: IA of Communities policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy CO1 - Protection of Existing Open Spaces	9	10	7	0	0	0	None	None	None
Policy CO2 - New and Enhanced Open Spaces	9	10	7	0	0	0	None	None	None
Policy CO3 - Open Space Standards	10	8	8	0	0	0	None	None	None
Policy CO4 Cultural, Community and Health Facilities	10	0	16	0	0	0	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	7	6	13	0	0	0	None	None	None
Policy CO6: Securing Educational Places	3	3	20	0	0	0	None	None	None

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
through New Residential Development									
Policy CO7 – Health Impact Assessments in New Development	2	6	18	0	0	0	None	None	None
Policy CO8 Hot Food Takeaways	1	4	21	0	0	0	None	None	None
Policy CO9 Creating Sustainable and Accessible Communities	2	9	15	0	0	0	None	None	None

Protecting our Local Environment

Table 41: IA of Protecting our Local Environment policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement	
Policy LE1 - Noise Pollution and Vibration in New Development	2	0	24	0	0	0	Effects increase from + to ++ over time against IA8 (health) and IA15 (environmental quality).	None	None	
Policy LE2 - Ground Conditions and Contaminated Land	3	5	18	0	0	0	Effects increase from + to ++ over time against IA18 (regeneration);	None	None	
Policy LE3 - Air Quality	4	5	17	0	0	0	Effects increase from + to ++ over time against IA7 (infrastructure).	None	None	

Infrastructure and Delivery in Oldham

Table 42: IA of Infrastructure and Delivery in Oldham policies at Draft Local Plan stage

Scoring system	++	+		?	X	XX	Variations in score	Mitigation	Enhancement
Policy IN1 Digital	1	3	22	0	0	0	None	None	None
Infrastructure and									
Telecommunications									
Policy IN2 –	9	12	5	0	0	0	None	None	None
Planning Obligations									
Policy IN3 -	6	1	19	0	0	0	None	None	None
Delivering Social									
Value and Inclusion									

Site Allocations Appraisal

7.47 Each proposed site allocation for development in the Draft Plan has been appraised. The full IA appraisal can be seen in Appendix 17, 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.

7.48 The conclusion for each site is given below.

7.49 For the site selection methodology please see the site selection topic paper.

Table 43: IA of proposed site allocations at Draft Local Plan stage

Proposed Site Allocation	Site IA Summary
Ashton Road Woodhouses	The site is currently a Phase 2 UDP Housing Allocation which remains largely undeveloped, except for three homes which are under construction on a small part of the site (PA/341528/18).
Woodinedood	The site has some wetland habitats and trees. Ecology and tree surveys will be required. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. The HRA addresses mitigation for any likely significant effects.
	The site scored negatively against three IA objectives as it is a greenfield site and its location in Woodhouses which is more rural, means that the site is low in terms of access to services and public transport accessibility (with access to only a primary school and a church within 800m).
	There are some uncertainties where details are not likely to be known until later in plan process or planning application stage in relation to heritage, environmental quality, footpaths, contributions to health and education. Policies are in place to ensure that appropriate mitigation is implemented to support planning approvals.
	The site scored positive against other criteria in particular those on flood risk, water quality highways and waste.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review, however deliverability will be further investigated.

Proposed Site Allocation	Site IA Summary
Land at Ripponden Road, Denshaw	Overall, the site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site also either scored positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There is uncertainty in relation to heritage concerns, because of the proximity of the site to existing heritage assets, however mitigation may be possible.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site scored negative for consisting of greenfield land and for having medium public transport accessibility which reflects its more rural setting; however it scored positively for access to services and facilities. NPPF does allow for a mix of sites so although the Draft Local Plan aims to maximise the proportion of previously developed land that is used to meet development needs it is recognised that some greenfield sites can make up the housing land supply.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Land at Knowls Lane	The site has extant planning permission for 234 homes (RES/350225/22). The planning application process has considered several of these objectives as part of the approval process to ensure sustainable development. Should the approved development scheme not come forward, any future development of the site would be expected to come forward in line with local planning policy.
	The site has some ecological concerns which have been considered through the extant planning permission and it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.

Proposed Site Allocation	Site IA Summary
	The site scores a significantly positive for having good access to key services. The site also either scores positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stages of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site scored negative for consisting of greenfield land. NPPF does allow for a mix of sites so although the Local Plan aims to maximise the proportion of previously developed land that is used to meet development needs it is recognised that some greenfield sites can make up the housing land supply.
	Based on the IA and HRA assessment and taking into account the extant planning permission, the site is generally acceptable to progress to the next Local Plan Review stage.
Bailey Mill, Delph	The site has some developing scrub woodland, but no overriding ecological constraints. Ecology surveys will be needed.
	The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. Furthermore, proximity to South Pennine Moors necessitates assessment of the site as potential functionally linked land. The HRA has confirmed the site can be discounted as being functionally linked. The HRA addresses mitigation for any likely significant effects.
	The site is a Phase 1 Saved UDP Housing Allocation. The site scored negatively against one IA objective as it does not have good public transport accessibility. However, Delph village has a co-op, post office and a range of cafes / pubs and other services and a primary school just within 800m and therefore within walking distance. This could be taken into consideration given the opportunity to redevelop the remains of a listed mill complex in a rural setting.

Proposed Site Allocation	Site IA Summary
	There are some uncertainties where details are not likely to be known until later in plan process or planning application stage in relation to ecology, heritage and contributions to health and education. Policies are in place to ensure that appropriate mitigation is implemented to support planning approvals.
	The site scored positives against other criteria in particular those on flood risk, water quality, highways and waste. A significantly positive score was given for previously developed land.
	Based on the IA and HRA and taking into account the need to find sustainable uses for heritage assets the site would appear acceptable to progress through the next stages of the Local Plan Review.
Lilac View Close	The site has a pending planning application for residential development FUL/350791/23 (21 residential units).
Lilac view Close	The site has no overriding ecological constraints. It is adjacent a water course which will need protection.
	The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scored positives against criteria in particular those on heritage, flood risk and waste. The site scores significantly positive for public transport accessibility.
	This site is a saved phase two UDP housing allocation. The site scored negatively against one IA objective as it is a greenfield site. However, the site has access to a number of key services, including health services and a primary school. NPPF does allow for a mix of sites so although the Local Plan aims to maximise the proportion of previously developed land that is used to meet development needs it is recognised that some greenfield sites can make up the housing land supply.
	There are some uncertainties where details are not likely to be known until later in plan process or planning application stage in relation to source protection zone, footpaths, highways and contributions to health and education. Policies are in place to ensure that appropriate mitigation is implemented to support planning approvals.

Proposed Site Allocation	Site IA Summary
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Land at Springhey Mill, Huddersfield Road	The site has no overriding ecological constraints. However, the site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being a previously developed site and also within a deprived area so the site would assist with regeneration. The site also scores positively in relation to access to services, flood risk, not being located within a Source Protection Zone or waste designation and due to it being acceptable in principle in relation to highways.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review, where some of the uncertainties can be further investigated.
Pretoria Road, Oldham	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores very positively for being accessible to several key services and facilities and public transport. The site also scores positively as it is previously developed land within the urban area. The site scores positively as it is located within a very deprived area whereby development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.

Proposed Site Allocation	Site IA Summary
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.
	An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site scores potentially negatively in terms of loss of employment uses, as it is currently in active use for employment. Mitigation is contained within the Local Plan which ensures that we are able to meet out employment land requirement.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Blackshaw Lane,	Site has developed some ecological interest and will require habitat and tree surveys.
Royton	The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible, sustainable location with access to several key services but also being located within a deprived area so the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. In addition, the site scored uncertain against promoting and protecting open space as the site is currently identified as natural/semi-natural open space. It is noted that replacement provision would be required as a result of development of this site as a compensatory measure, and in line with local planning policy. Site specific criteria relating to health, education and open space to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.
	An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.

Proposed Site Allocation	Site IA Summary
	The site scores potentially negative against using brownfield land efficiently as it is a greenfield site. The site has previously been allocated for housing in the Local Plan. Other policies will ensure that this land is used efficiently.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Land at North Werneth	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores four significantly positives for being a previously developed site in an area with the highest level of deprivation so the site would significantly assist with regeneration and tackling deprivation and disparity. The site also has very high public transport accessibility and access to key services. The site also either scores positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. Environmental health issues would need to be considered at planning application stage.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Hartford Mill, Edward Street	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores four significantly positives for being a previously developed site in an area with the highest deprivation so the site would significantly assist with regeneration. The site also has very high public transport accessibility and

Proposed Site Allocation	Site IA Summary
	access to key services. The site also either scores positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with Planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. Environmental health issues would need to be considered at planning application stage.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Abbotsford Road, Derker	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible location with access to several transport options. The site also scored positively in terms of access to key services. In addition, the site is within 1km of Oldham Town Centre where there are a range of services and facilities.
	Also being located within a very deprived area development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.

Proposed Site Allocation	Site IA Summary
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Thornham Mill, Oozewood Road, Royton	The site has an extant planning permission for 60 residential units (FUL/346141/21). The planning application process has considered several of these objectives as part of the approval process to ensure sustainable development. Should the approved development scheme not come forward, any future development of the site would be expected to come forward in line with local planning policy.
	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site has scored a mixture of positive and neutrals with regards to ecology, landscape, heritage, flood risk, water quality, air quality, waste, minerals and public transport accessibility. A significantly positive score was given for the site being previously developed in the urban area.
	There are a number of uncertainties around contributions to health and education and strategic highway network although it should be noted the site does benefit from a planning approval. The site scored a negative against access to services as only primary schools are within 800 metres. A number of other key services are within 1000m and the site is within a 15 minute walk to Royton centre.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Former Territorial Army Centre, Rifle Street	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.

Proposed Site Allocation	Site IA Summary
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Land at Ward Lane, Diggle	The site is immediately adjacent to the Huddersfield Narrow Canal Site of Biological Importance (SBI) and is also a Green Corridor, which the site falls within. Ecology surveys will be required.
Lane, Diggio	The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The site was also assessed for being functionally linked to qualifying bird species of the South Pennines SPA but this was discounted. The HRA addresses mitigation for any likely significant effects.
	The site also either scored positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected. There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if the allocation progresses. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site also scored negative for consisting of greenfield land and for having medium public transport accessibility which reflects its more rural setting. However it scored positively for access to services and facilities. NPPF does allow for a mix of sites so although the Local Plan aims to maximise the proportion of previously developed land that is used to meet development needs it is recognised that some greenfield sites can make up the housing land supply.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.

Proposed Site Allocation	Site IA Summary
Shaw Distribution Centre, Linney Lane	The site has outline planning permission for 400 homes (OUT/345898/20). The planning application process has considered several of these objectives to ensure sustainable development. Should the approved development scheme not come forward, any future development of the site would be expected to come forward in line with local planning policy.
	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects. The site scores a significantly positive for having good access to key services, facilities and public transport. The site also either scores positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected. The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within 400m of Shaw centre.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site has scored negatively against loss of employment uses because the site was formerly used for employment purposes. The planning application process has considered the loss of the employment uses and demolition of the site has since begun. The Local Plan will ensure there is sufficient employment land.
	Based on the IA and HRA assessment and taking into account the extant planning permission, the site is acceptable to progress to the next Local Plan Review stage.
Land adjacent to Huddersfield Road, Diggle	The site has an extant planning permission for 64 homes (FUL/349826/22). The planning application process has considered several of these objectives to ensure sustainable development. Should the approved development scheme not come forward, any future development of the site would be expected to come forward in line with local planning policy.

Proposed Site Allocation	Site IA Summary
	The site has some ecological concerns, which the planning application addressed. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites.
	Furthermore, proximity to South Pennine Moors necessitates assessment of site as potential functionally linked land. However, the HRA states that this site has been surveyed and assessed as part of a recent planning application. It was concluded from these surveys that the site is not functionally linked because of a lack of records of qualifying bird species and because the habitat was considered unsuitable for supporting significant numbers of qualifying bird species.
	The HRA addresses mitigation for any likely significant effects.
	The site either scores positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site scored negative for consisting of greenfield land, having medium public transport accessibility and its access to key services which reflects its more rural setting. NPPF does allow for a mix of sites so although the Local Plan aims to maximise the proportion of previously developed land that is used to meet development needs it is recognised that some greenfield sites can make up the housing land supply.
	Based on the IA and HRA assessment the site does appear to be acceptable on balance and taking into account the extant planning permission the site is generally acceptable with mitigation.
Land between Prince Street, Oldham Way and	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.

Proposed Site Allocation	Site IA Summary
Mumps (Princes Gate)	The site scores significantly positive for being in an accessible town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre and can support mixed-use development, however the extent to which this impacts on sustainable growth and job creation is unknown as the mixed-use split is not known at this stage. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity due to being located adjacent to a Metrolink stop. It is considered that any impact can be mitigated in line with planning policy.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Land at former Broadway House/Library,	The site has developed some ecological interest and will require habitat and tree surveys. The site hast has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. The HRA addresses mitigation for any likely significant effects.
Broadway	The site scores significantly positive for being in an accessible location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.

Proposed Site Allocation	Site IA Summary
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.
	The site scored potentially negative/ uncertain in terms of highway impact/ access as this will need to be determined through detailed design. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity and air quality due to being located adjacent to the junction of a major road which is affected by pollution, although the site is primarily within a residential area. It is considered that any impact can be mitigated in line with planning policy.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review. However, consideration should be given to the identified highways issues and the uncertainty regarding the impact of these at this stage.
Shaw Health Centre, High Street, Shaw	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
Street, Shaw	The site scores positively for being in an accessible location with access to several transport options and in terms of access to services and facilities. The site scores positively as it is located within a very deprived area whereby development of the site would assist with regeneration. The site scores positively as it is previously developed land.
	The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.

Proposed Site Allocation	Site IA Summary
	The site scored positive in terms of highway impact/ access as the site has some highways concerns, but it is considered that these can be mitigated through a detailed design. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
London Road,	The site has a pending planning application for residential development (FUL/350118/22).
Derker	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible location with access to several transport options. The site scored positively in terms of access to key services. In addition, the site is within 1km of Oldham Town Centre where there are a range of services and facilities. Also being located within a very deprived area development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
South Chadderton School, Butterworth Lane	The site has no overriding ecological constraints, however it has been screened in by HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites and its proximity to the Rochdale canal SAC could cause harm to the special interest of the Canal. The HRA addresses mitigation for any likely significant effects. This includes that for this site at planning application stage a project-level HRA would be required.

Proposed Site Allocation	Site IA Summary
	The site scores positively for being in an accessible location with access to several transport options, however scores potentially negative in terms of access to services and facilities. The site scores positively as it is located within a very deprived area whereby development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.
	The site scores uncertain as it is mixed land within the urban area but appears that less than 50% of the site is brownfield, as a result of former sports pitches onsite from previous school use.
	The site scored uncertain in terms of highway impact/ access as the site has some highways concerns, but it is considered that these can be mitigated through a detailed design and potential offsite mitigation measures. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site also scores uncertain in terms of amenity due to being located adjacent to the M60 motorway, although the site is at a different level and within a primarily residential area. It is considered that any impact can be mitigated in line with planning policy.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Higher Lime Recreation Ground, Limeside	The site has some ecological interest and will require ecology surveys. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
·	The site scores very positively for being accessible to several key services and facilities, however scores potentially negative in terms of access to public transport. The site scores positively as it is located within a very deprived area

Proposed Site Allocation	Site IA Summary
	whereby development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.
	The site scores potentially negatively as it is greenfield land within the urban area and is identified as natural/seminatural open space. Development of the site would need to provide mitigation to account for the loss of the open space, including providing replacement provision, in line with local planning policy.
	An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity due to being located adjacent to the M60 motorway, although the site is at a different level and within a primarily residential area. It is considered that any impact can be mitigated in line with planning policy.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Kaskenmoor School, Roman Road	The site has no overriding ecological constraints, however the mature trees should be retained. The site however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores positively for being in an accessible location with access to several transport options and positive for access to services and facilities. The site also scores positively as it is located within a very deprived area whereby development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.

Proposed Site Allocation	Site IA Summary
	The site scores uncertain as it is mixed land within the urban area but appears that less than 50% of the site is brownfield, as a result of former sports pitches onsite from previous school use. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity due to being located adjacent to the M60 motorway, although the site is at a different level and within other residential properties nearby. It is considered that any impact can be mitigated in line with planning policy.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Saddleworth School, High Street, Uppermill	The site has limited ecological concerns. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. Furthermore, proximity to South Pennine Moors necessitated assessment of site as potential functionally linked land. However, it was concluded that this site does not support habitats suitable for use as functionally linked land by qualifying bird species. The HRA addresses mitigation for any likely significant effects. The site scores significantly positive for having good access to key services and being on previously developed site within the urban area. It is close to Uppermill centre so may contribute towards increased vitality of the centre. The site also either scores positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected. There are a few uncertainties around provision of health and education, which at this
	stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. Further work on ecology, highways and public rights of way would be needed.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.

Proposed Site Allocation	Site IA Summary
Former Lancaster House, Rochdale Road, Royton	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
, ,	The site scores positively for being in an accessible location with access to several transport options and key services and facilities. The site scores positively as it is located within a deprived area whereby development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site scores positively as it is mixed land within the urban area and appears that more than 50% of the site is brownfield.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Former Cromford	The site has a pending planning application for residential development (FUL/350118/22).
Mill	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible location with access to several transport options. The site scored positively in terms of access to key services. In addition, the site is within 1km of Oldham Town Centre where there are a range of services and facilities. Also being located within a very deprived area development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.

Proposed Site Allocation	Site IA Summary
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.
	The site scores uncertain in terms of highway access, however it is considered that concerns related to integration with existing street layout can be mitigated against. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Tommyfield Market, Former Leisure Centre and	The site has no overriding ecological concerns. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
Linear Park	The site scores significantly positive for being in an accessible town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if the allocation progresses. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity due to being located adjacent to the bus station and a major road, however it is a town centre location with a mix of uses and as such it is considered that any impact can be mitigated in line with planning policy.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre and can support mixed-use development, however the extent to which this impacts on sustainable growth and job creation is unknown as the mixed-use split is not known at this stage. The allocation includes land

Proposed Site Allocation	Site IA Summary
	which will become the town centre Linear Park will significantly improve access to open space and support the wider vitality of the town centre.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Civic Centre, West Street	The site has no overriding ecological concerns. The site has been screened in by HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if the allocation progresses. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity due to being located adjacent to the bus station and a major road, however it is a town centre location with a mix of uses and as such it is considered that any impact can be mitigated in line with planning policy.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre and can support mixed-use development, however the extent to which this impacts on sustainable growth and job creation is unknown as the mixed-use split is not known at this stage.
	No negative scores were given.

Proposed Site Allocation	Site IA Summary
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Former Magistrates Court and Chambers	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if the allocation progresses. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity due to being located adjacent to the bus station and a major road, however it is a town centre location with a mix of uses and as such it is considered that any impact can be mitigated in line with planning policy.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre and can support mixed-use development, however the extent to which this impacts on sustainable growth and job creation is unknown as the mixed-use split is not known at this stage.
	No negative scores were given. Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Bradshaw Street Car Park	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.

Proposed Site Allocation	Site IA Summary
	The site scores significantly positive for being in an accessible town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre and can support mixed-use development, however the extent to which this impacts on sustainable growth and job creation is unknown as the mixed-use split is not known at this stage. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site also scores uncertain in terms of amenity/ noise due to being located close to night-time economy uses, however it is a town centre location with a mix of uses and as such it is considered that any impact can be mitigated in line with planning policy.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Southlink	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects. The site scores significantly positive for being in an accessible edge of town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.

Proposed Site Allocation	Site IA Summary
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity and air quality due to being located close to the Strategic Road Network (SRN) and there are existing employment uses onsite. However, it is an edge of town centre location with a mix of uses and as such it is considered that any impact can be mitigated in line with planning policy.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within 400m of Oldham Town Centre.
	The site has scored negatively against loss of employment uses because there are several employment uses currently on parts of the site. The site is likely to only be developed in the long term and the Local Plan will ensure there is sufficient employment land.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Land at Flint Street	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible location with access to several transport options and key services and facilities. Also being located within a very deprived area development of the site would assist with regeneration. The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review.

Proposed Site Allocation	Site IA Summary
	The site scores uncertain in terms of highway access, however it is considered that concerns related to integration with existing street layout can be mitigated against. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
James Street, Failsworth	The site has some landscape features onsite, such as mature trees, foraging bats have also been sited, although there is no overriding ecological constraints in relation to the site.
	The site has been screened in by HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites.
	The site scored significantly positively for access to services and public transport. The site scored significantly positive for assisting with regeneration as it is within a deprived area. The site also scores positive for objectives such as with 400m of a centre, flood risk and for not being in a SPZ.
	The site scores potentially negatively for being a mixed site within the urban area where it is considered that less than 50% of the site is previously developed.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.

Proposed Site Allocation	Site IA Summary
Land at Mumps and Wallshaw	The site has limited ecological interest, although it is noted that it may be worth inspecting the site for invasive non-native plant species.
Street	The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible and sustainable location but also a deprived area so the site would assist with regeneration. The site has scored positive in relation to flood risk, not being located within a SPZ or a waste designation and due to it being broadly acceptable in principle in highways terms. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. The site also scored uncertain in terms of being adjacent to a Metrolink stop. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre and can support mixed-use development, however the extent to which this impacts on sustainable growth and job creation is unknown as the mixed-use split is not known at this stage.
	No negative scores were given.
	Based on the IA and HRA assessment, the site does appear to be acceptable to progress, through the next stages of the Local Plan Review.
Land at Waterloo Street, Oldham	The site has limited ecological concerns, although ideally the mature trees within the footprint of the development would be retained.

Proposed Site Allocation	Site IA Summary
	The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible, sustainable location but also a deprived area so the site would assist with regeneration. The site scores positives in relation to flood risk, not being within a Source Protection Zone (SPZ) or waste designation and due to it being acceptable in principle on highways grounds. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. In addition, there is an uncertainty due to there being several Public Rights of Way on site, which would need to be considered at design stage.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre and can support mixed-use development, however the extent to which this impacts on sustainable growth and job creation is unknown as the mixed-use split is not known at this stage. No negative scores were given.
	Based on the IA and HRA assessment alone the site would appear acceptable to progress through the next stages of the Local Plan Review.
Royton Wastewater Treatment Facility,	The site has some ecological concerns owing to its remediation and it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
Middleton Road	The site scores positive for being a previously developed site and positive for having good public transport accessibility and having moderate deprivation so the site would assist with regeneration and tackling deprivation. The

Proposed Site Allocation	Site IA Summary
	site also either scores positive where the site is not within a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with Planning policy. However, site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	Environmental health issues would need to be further assessed with regards to issues such as noise and appropriate mitigation implemented. PROW would need to be considered within the design of the development.
	The site also does not have good access to services, owing to its edge of town location, and scored negatively.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Henshaw House	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity due to being located adjacent to the bus station, however it is a town centre location with a mix of uses and as such it is considered that any impact can be mitigated in line with planning policy.

Proposed Site Allocation	Site IA Summary
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre and can support mixed-use development, however the extent to which this impacts on sustainable growth and job creation is unknown as the mixed-use split is not known at this stage.
	No negative scores were given.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Land at Southlink Phase 2	The site has good tree cover and will require surveys. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible edge of town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity and air quality due to being located close to the SRN and there are existing employment uses onsite. However, it is an edge of town centre location with a mix of uses and as such it is considered that any impact can be mitigated in line with planning policy.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within 400m of Oldham Town Centre.

Proposed Site Allocation	Site IA Summary
	The site has scored negatively against loss of employment uses because there are several employment uses currently on parts of the site. The site is likely to only be developed in the long term and the Local Plan will ensure there is sufficient employment land.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Land at Hilda Street	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site also scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area.
	No negative scores were given.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Foundry Street	The site has limited ecological concerns, with only some semi-mature trees present having some ecological value, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting

Proposed Site Allocation	Site IA Summary
	in increased air pollution effects and increased recreational disturbance on European sites. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positive for being in an accessible town centre location with access to several transport options and key services and facilities. Also being located within a very deprived area - development of the site would assist with regeneration. The site scores significantly positive against using brownfield land efficiently as it is a previously developed site in the urban area. The site also scores positively against ensuring the vitality of the borough's centres as it is within Oldham Town Centre. The site also either scores positive where the site is not affected by a constraint / not likely to impact or neutral because no adverse impacts are expected.
	There are a few uncertainties around provision of health and education, which at this stage all housing would be expected to contribute to in line with planning policy. Site specific criteria to address this could be added to an allocation if it progresses through to the next stage of the Local Plan review. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. The site also scores uncertain in terms of amenity due to being located adjacent to a college and a major road, however it is a town centre location with a mix of uses and as such it is considered that any impact can be mitigated in line with planning policy.
	No negative scores were given.
	Based on the IA and HRA assessment the site would appear acceptable to progress through the next stages of the Local Plan Review.
Land at Mersey Rd	The site has limited ecological concerns, although it is noted that the mature trees on the site should be retained.
North / Albert Street, Failsworth	The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positively in relation objectives around brownfield land and public transport accessibility and positive for objectives such as flood risk, historic assets and deprivation. It scores a number of neutral scores due constraints not being present such as ecological features, minerals safeguarding areas or footpaths.

Proposed Site Allocation	Site IA Summary
	There are some non-applicable responses too as some of the objectives relate to sites we are proposing as housing allocations rather than employment ones such as provision of open space, education and health facilities. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage and there may be some mitigation needed regarding the access, so this has also scored uncertain.
	Another uncertain is the effect on our centres, this is because it is unknown at this stage if the site will be suitable for office or industrial and warehousing.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review, where some of the more uncertain issues can be investigated further.
Sellers Way	The site has limited ecological concerns, however it has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positively in relation objectives around brownfield land and public transport accessibility and positive for objectives such as flood risk, historic assets and deprivation. It scores a number of neutral scores due constraints not being present such as ecological features, minerals safeguarding areas or footpaths. There are some non-applicable responses too as some of the objectives relate to sites we are proposing as housing allocations rather than employment ones such as provision of open space, education and health facilities.
	An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. Also potentially uncertain is the effect on our centres, this is because it is unknown at this stage if the site will be suitable for office or industrial and warehousing.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.

Proposed Site Allocation	Site IA Summary
Land at Greenside Way, Chadderton	The site has an extant planning permission for the erection of two buildings for office, industry and / or warehousing use (FUL/348818/22). The planning application process has considered several of these objectives to ensure sustainable development. Should the approved development scheme not come forward, any future development of the site would be expected to come forward in line with local planning policy.
	The site has some ecological interest with mature broadleaved tree cover. Ecology and tree surveys will be required. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. The HRA addresses mitigation for any likely significant effects.
	The site scores positively in relation objectives around flood risk, historic assets and public transport accessibility. It scores a number of neutral scores due constraints not being present such as ecological features, minerals safeguarding areas or footpaths. There are some non-applicable responses too as some of the objectives relate to sites we are proposing as housing allocations rather than employment ones such as provision of open space, education and health facilities. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. Also uncertain is the effect on our centres, this is because it is unknown at this stage if the site will be most suitable for office or industrial and warehousing.
	No negative scores were given.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.
Land at Greengate, Chadderton	The site has an extant planning permission for the erection of two buildings with combined floorspace of 7,540m ² GEA / 7,308m ² (FUL/348818/22). The planning application process has considered several of these objectives to ensure sustainable development. Should the approved development scheme not come forward, any future development of the site would be expected to come forward in line with Local Planning policy.
	The site has some ecological interest as it contains mature broadleaved tree cover. Ecology and tree surveys will be required. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. The HRA addresses mitigation for any likely significant effects.

Proposed Site Allocation	Site IA Summary
	The site scores positively in relation objectives around flood risk, historic assets and public transport accessibility. It scores a number of neutral scores due constraints not being present such as ecological features, minerals safeguarding areas or footpaths. There are some non-applicable responses too as some of the objectives relate to sites we are proposing as housing allocations rather than employment ones such as provision of open space, education and health facilities. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. Also uncertain is the effect on our centres, this is because it is unknown at this stage if the site will be most suitable for office or industrial and warehousing. No negative scores were given.
Former British Gas Site, Higginshaw Lane	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review. The site has an extant planning permission for the erection of two buildings for a storage and distribution unit with ancillary office (PA/344755/20). The planning application process has considered several of these objectives to ensure sustainable development. Should the approved development scheme not come forward, any future development of the site would be expected to come forward in line with local planning policy.
	The site has no ecological constraints. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution. The HRA addresses mitigation for any likely significant effects.
	The site scores positively in relation objectives around flood risk, historic assets and public transport accessibility. There are some non-applicable responses too as some of the objectives relate to sites we are proposing as housing allocations rather than employment ones such as provision of open space, education and health facilities. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage. Another uncertain is the effect on our centres, this is because it is unknown as yet if the site will be suitable for office or industrial and warehousing.
	The site also scored uncertain in relation to the waste objective as the site is within a designated waste area however as it is not yet known if the site is most suitable for office or industry and warehousing the impact is uncertain.

Proposed Site Allocation	Site IA Summary		
	No negative scores were given.		
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review, where some of the more uncertain answers can be investigated further.		
Albert Street, Failsworth, Oldham	The site has an extant planning permission for the erection of employment led mixed-use development (PA/333717/13). The planning application process has considered several of these objectives as part of the approval process to ensure sustainable development. Should the approved development scheme not come forward, any future development of the site would be expected to come forward in line with local planning policy.		
	The site supports semi-natural habitat with reasonable bird interest. The site will require habitat and bird surveys. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. The HRA addresses mitigation for any likely significant effects.		
	The site scores significantly positively in relation the objectives around brownfield land and regeneration and positives for the objectives around public transport accessibility, flood risk and historic assets. It scores a number of neutral scores due to minerals safeguarding areas not being present and for not being in close proximity to existing residential areas. There are some non-applicable responses too as some of the objectives relate to sites we are proposing as housing allocations rather than employment ones such as provision of open space, education and health facilities.		
	An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage, and the presence of PRoW on site has also scored uncertain, which would need to be taken into account in the detailed layout and design of the site.		
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review, where some of the more uncertain answers can be investigated further.		
Land at Foxdenton	The site has an extant outline planning permission for a mixed-use development (PA/334355/13), a reserved matter		

Proposed Site Allocation	Site IA Summary
	There is some wet grassland and scrub along watercourse in the northern part of the site so ecology surveys required. The site has been screened in by the HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. Furthermore, proximity to the Rochdale Canal SAC could cause harm to the special interest of the Canal during development and therefore a project level HRA would be needed at planning application stage.
	The site scores some uncertain scores, this is due to its proximity to the Rochdale Canal and that the employment use (office or industry and warehousing) has not yet been specified. There are also some uncertainties with regards air quality and local environmental quality due to the proximity of the homes on Foxdenton Lane.
	The site scores negatively as it is a greenfield site in the urban area. There are some non-applicable responses too as some of the objectives relate to sites we are proposing as housing allocations rather than employment ones such as provision of open space, education and health facilities, in addition an assessment on the strategic highway network is not yet complete and so this is uncertain at this stage.
	Based on the IA and HRA assessment, the site does appear to be acceptable to progress, through the next stages of the Local Plan Review.
Former Windsor Mill, Hollins Road, Failsworth	No overriding ecological constraints. The site has been screened in by HRA as increases in population could result in increased road traffic resulting in increased air pollution effects. The site is also close to the Rochdale Canal SAC (within 200m) development could result in direct impacts on the Canal. The HRA addresses mitigation for any likely significant effects.
	The site scores significantly positively in relation the objectives around brownfield land and public transport accessibility and positives for the objectives around flood risk, being in an employment area and with regards deprivation.
	It scores a number of neutral scores due to minerals safeguarding areas not being present and for not being in close proximity to existing residential areas. There are some non-applicable responses too as some of the objectives relate to sites we are proposing as housing allocations rather than employment ones such as provision of open space, education and health facilities. An assessment on the strategic highway network is not yet complete and so this is uncertain at this stage and the objective regarding access to the site is undetermined and therefore scored uncertain.

Proposed Site Allocation	Site IA Summary
	Another uncertain is the effect on our centres, this is because it is unknown as yet if the site will be suitable for office or industrial and warehousing.
	Based on the IA and HRA assessment the site does appear to be acceptable to progress through the next stages of the Local Plan Review.

Propose measures to monitor the significant effects of implementing the DPD

7.50 The IA indicators were established at Stage A of the IA process (Scoping Report). They have been amended over time in response to consultation responses and through reviewing any new indicators available.

7.51 These can be seen within Section 15 of the Scoping Report Update 2 alongside the IA objective that they help to monitor. For ease the indicators are outlined below.

- 1. Single data list 160-00 Proportion of local sites where positive conservation management is being or has been implemented
- 2. Change in areas of biodiversity designations (i.e. SBI updates)
- 3. Reporting on delivery of BNG
- 4. Number of offsite BNG habitat created in the borough (on council owned land)
- 5. Percentage of tree cover
- 6. Number of planning applications that result in the gain or loss of identified open space
- 7. Quantity of identified open space per 1000 population
- 8. Accessibility to open space in the borough by typology
- 9. Number of major developments refused on landscape grounds
- 10. Number of heritage assets on the National Heritage List for England
- 11. Number of entries on the English Heritage 'Heritage at Risk Register'
- 12. Number/ extent of Conservation Areas
- 13. Number of listed buildings and number of buildings in conservation areas lost through new development proposals
- 14. Number of planning applications that have been given nine greens and above under Building for a Healthy Life
- 15. Number and type of developments permitted in the Green Belt
- 16. Number and type of developments permitted in Local Green Spaces
- 17. Infrastructure Funding: Total amount of money received secured through s106; Total amount of s106 receipts collected before the reported year but which have not been allocated; and Total amount of s106 expenditure for the reported year (including transferring it to another person to spend)
- 18. Healthy Life Expectancy (HLE) remaining at 65
- 19. Life expectancy at birth
- 20. Sports and Physical Activity Levels (Adults 16+)
- 21. Childhood obesity rates
- 22. The number of new hot food takeaways approved within 400 metres of a principal entry point of a secondary school

- 23. Self-reported loneliness
- 24. Number of planning permissions granted contrary to Environment Agency advice on flood risk and water quality grounds
- 25. Number of new developments where agreed with the council incorporating Sustainable Drainage System (SUDS) to Ciria standard
- 26. Water Framework Directive status of all waterbodies in the borough
- 27. Number of planning applications with conditions attached relating to contaminated land
- 28. Number of days in Greater Manchester where air pollution was moderate or higher
- 29. Annual mean nitrogen dioxide
- 30. Per capita emission estimates, industry, domestic and transport sectors
- 31. Number of pedestrian or cycling casualties per year
- 32. Travel Diary Survey: Main Mode all trips and Main Mode commute trips
- 33. Percentage increase of adults cycling for 3 days a week
- 34. Number of travel plans secured as a condition of planning permission
- 35. Access to key services
- 36. Proportion of fuel poverty poor
- 37. Total amount of additional floorspace (office, industry and warehousing) by type square metres (sqm) gross
- 38. Total Amount of employment floorspace (gross) on previously developed land by type
- 39. Employment land available by type hectares (ha)
- 40. Land developed for business and industry
- 41. 'Health' of town centres (to be determined by assessing the uses and vacancies within each centre)
- 42. Number of homes completed within the borough's centres
- 43. Number of new cultural and leisure facilities permitted
- 44. Indices of Deprivation
- 45. Unemployment rate
- 46. Percentage of young people not in education, employment or training (NEET)
- 47. State funded primary and secondary school capacity and forecasts
- 48. Number of education related developments started and/or completed
- 49. Qualification levels (aged 16-64)

- 50. 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
- 51. Total completions on housing allocations and non-allocated sites
- 52. New and converted dwellings on previously developed land
- 53. Development density in schemes of 10 dwellings or more
- 54. Total housing completions by size and type on major sites
- 55. Affordable housing completions by type and size
- 56. Total completions of specialist housing provision (including older persons housing and housing for disabled people)
- 57. Total completions for C2 housing uses
- 58. Number of planning applications approved for Homes in Multiple Occupation
- 59. Number of self-build, custom-build or community housebuilding plots delivered as part of development sites
- 60. Number of vacant properties
- 61. Net additional pitches (Gypsy and Traveller)
- 62. Production of primary land won aggregates by mineral planning authority
- 63. Production of secondary and recycled aggregates by mineral planning authority
- 64. Local Authority Collected Waste (LACW)

Equalities Impact Assessment at Draft Plan Stage

7.52 The EIA is addressed through the Oldham Impact Assessment tool. A tool that has been developed by Oldham Council to assess the impact of relevant policies, programmes and decisions on equalities characteristics as well as our corporate priorities and the Future Oldham aims.

7.53 As stated above the Impact Assessment Tool helps to ensure the decisions made within Oldham Council fit with the council's visions and priorities within the council's Corporate Plan and 'Our Future', a plan developed with partners. It also helps the council to treat residents (and non-residents) fairly, assessing the impact of decisions on different groups of people with protected characteristics.

7.54 The Impact Assessment Tool was completed by planning policy. The outcome of the assessment is shown below (please see appendix 18 for full assessment).

Table 44: Impact Assessment Tool at Draft Local Plan stage

Equality	Impact	Comment
Characteristic	Score	
Gender	0 – Neutral	
Reassignment		
Marriage and	0 – Neutral	
civil partnership		
Pregnancy and	0 – Neutral	
maternity		
Race	0 – Neutral	
Religion or belief	0 – Neutral	
Sex	0 – Neutral	
Sexual orientation	0 – Neutral	
Care leavers	2 – Moderate Positive	Oldham's Draft Local Plan will have a moderate positive effect on the borough's care leavers. The Plan seeks to promote a diverse housing offer to meet the differing needs of all Oldham's residents. Policy H6 Homes for Children and Care Leavers will support residential development for looked after children and care leavers, where the proposed development is compliant with other policies in PfE and the Local Plan. In deciding applications for new children's homes and semi-independent supported-living facilities, Policy H6 states that the council will seek to ensure that new provision: 1. Is established in appropriate premises and in suitable, sustainable locations; 2. Does not result in an undue concentration of provision for looked-after children in any particular
		area of the borough; and 3. Gives priority to children and young people from the Oldham area in the first instance, in line with local needs.

With regards to criterion 2) permission may not be granted where the proportion of C2 uses will result in C2 uses representing 10% or more of properties within a 50m radius measured from the centre of the application site. In addition, no two adjacent properties apart from those that are separated by a road should be converted to C2 uses. The council will make a decision on a case-by-case basis and considering the factors listed above. Applications for all C2 uses are required to provide a Statement of Community Engagement and Impact Assessment. 8 - Strong Oldham's Draft Local Plan will have a strong positive Age Positive effect on the borough's ageing population. The Plan seeks to promote a diverse housing offer to meet the differing needs of all Oldham's residents. This includes supporting the development of homes suitable for old people through Policy H4 'Homes for Older People', which seeks to ensure that housing choices are available for Oldham's growing older population so that they can find suitable homes with easy access to community facilities, local services and public transport, that are well integrated within the wider neighbourhood. This could be through the provision of age-restricted general market housing, extra-care housing, sheltered housing / assisted living and nursing and care homes. In addition, Policy H4 requires all provision for older people to meet the design standards as set out in Policy D1 and several key principles including ease of movement and being sustainably located. The Draft Local Plan also seeks to ensure that new homes are energy efficient and adaptable to address changing needs. For example, Places for Everyone (which will form part of Oldham's Local Plan upon adoption) Policy JP-H3 requires all new homes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific site conditions make this impracticable. Policy CO4 Cultural, Community and Health Facilities also seeks to maintain and improve access to a range of cultural, community (as defined in national planning policy) and health facilities in the borough. In addition, where the demand resulting from a major residential development will create, or exacerbate, a

shortfall in health provision the council will seek the provision of new or improved health facilities to

		address the unmet need generated by the
Disability	8 – Strong Positive	development as appropriate. Oldham's Draft Local Plan will have a strong positive effect on the borough's disabled population. The Plan seeks to promote a diverse housing offer to meet the differing needs of all Oldham's residents.
		This includes supporting the development of homes suitable for disabled people through Policy H5 'Homes for Disabled People', which seeks to ensure that appropriate provision of housing is provided for disabled people, including people with physical disabilities, learning disabilities and mental health needs. This could be through the provision of supported housing (of various degrees) and accessible and adaptable homes.
		In addition, Policy H5 requires all provision for disabled people to meet the design standards as set out in Policy D1 and several key principles - Promoting ease of movement on foot and with mobility aids; Being sustainably located, with access to public transport, local services and facilities (including a hospital or GP practice) and accessible to the development via active travel means; Featuring parking spaces and setting down points in proximity to entrances; and having accessible and appropriately designed built environments, including seating areas, step free spaces and gentle approaches suitable for wheelchair users and people with visual or mobility impairments.
		The Draft Local Plan also seeks to ensure that new homes are energy efficient and adaptable to address changing needs. For example, Places for Everyone (which will form part of Oldham's Local Plan upon adoption) Policy JP-H3 requires all new homes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific site conditions make this impracticable.
		Policy CO4 Cultural, Community and Health Facilities also seeks to maintain and improve access to a range of cultural, community (as defined in national planning policy) and health facilities in the borough. In addition, where the demand resulting from a major residential development will create, or exacerbate, a shortfall in health provision the council will seek the provision of new or improved health facilities to address the unmet need generated by the development as appropriate.
		Finally, criterion 7 of Policy D1 - A Design-Led Approach for Residential & Residential-Led Mixed- Use Development, supports the creation of inclusive

	neighbourhoods by embedding inclusive design within them.

7.55 No negative scores were identified for the Local Plan in the Impact Assessment Tool for equalities characteristics.

7.56 In addition, to the EIA the Impact Assessment Tool also resulted in positive scores for the Local Plan against Corporate priorities on 'Residents First', 'Income', Digitation' and 'Place-based working'.

7.57 The Local Plan scored positive against all of the Future Oldham aims on:

- Clean and green;
- Work;
- Transport;
- Pride and cohesion;
- Homes; Healthy and safe; and
- Education and Community and Leisure.

Health Impact Assessment for the Draft Plan (2023)

7.58 The Health Impact Assessment (HIA) that was carried out on the Draft Local Plan is contained within Appendix 19 in the IA (2021).

7.59 The HIA assesses the potential health and wellbeing impacts of the Local Plan. Guided by the London Healthy Urban Design Unit (HUDU) Rapid Health Impact Assessment tool and the Healthy Urban Planning Checklist, the planning policy team has carried out the HIA.

7.60 The Draft Local Plan recognises the value of HIAs and the role they can play in shaping development proposals by promoting sustainable developments that support the creation of strong, vibrant and healthy communities. Draft Local Plan Policy CO7 'Health Impact Assessments' sets out when a HIA is required to support development proposals.

7.61 The HIA 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.

7.62 Each of the above themes is supported by corresponding questions (assessment criteria). The HIA has identified where the Local Plan addresses each theme and assessment criteria.

7.63 There are no gaps where the Draft Local Plan has not addressed the above themes and so it can be 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.

Habitats Regulations Assessment of the Oldham Local Plan (Draft Plan stage)

7.64 A Habitats Regulations Assessment (HRA) on the Draft Local Plan was prepared by Greater Manchester Ecology Unit (GMEU). This can be seen in Appendix 20 of the IA.

7.65 The HRA forms a Screening and Appropriate Assessment of the HRA process to assess whether the Draft Local Plan needs to be amended to avoid harm to European sites or needs to go forward for further, more detailed Assessment of impacts.

7.66 From the Screening process the following European designated sites have been identified as having some potential to be affected by development proposed and planned for within the Oldham Draft Local Plan:

- Rochdale Canal SAC
- South Pennine Moors SAC
- Dark Peak Moors (South Pennine Moors Phase 1) SPA
- South Pennine Moors Phase 2 SPA

Initial Screening Option

7.67 The first stage of the HRA is a Likely Significant Effect Test (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 needs to go forward for more detailed Assessment.

7.68 The essential question to ask is:

"Is the Policy or the development of the Site, either alone or in combination with other relevant Policies and Plans, likely to result in a significant effect upon the integrity of European sites?"

7.69 The Policies¹ that have been 'Screened In' are:

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

¹ Please note that some policy names may differ slightly between the HRA and the Draft Local Plan

Economy and Employment

- Policy E1: Business and Employment Areas. In addition, a number of Business
 Employment Areas (BEAs) that the policy relates to have been screened in as they
 could result in increased road traffic resulting in increases in air pollution. Hollinwood
 Business District; Wrigley Street and Greengate / Broadgate BEAs are also close to
 the Rochdale Canal SAC (within 200m) and development could result in direct
 impacts on the Canal.
- Policy E2: Exceptions within Business and Employment Areas and other existing employment sites
- Policy E3: Reuse and redevelopment of Mill Buildings
- Policy E4: Office, Industry and Warehousing Allocations

Tourism:

Policy TM1: Tourism

Site allocations:

7.70 In terms of proposed site allocations, all of the sites were screened in.

Appropriate Assessment

7.71 The initial Screening process identified the following sources as potentially likely to have a likely significant effect (LSE) on European designated Sites:

Effects on functionally linked land:

7.72 Four allocations (Bailey Mill in Delph, Saddleworth School in Uppermill; Land East of Huddersfield Rd in Diggle and Land at Ward Lane, Diggle) were screened for functionally linked land but it was concluded that the sites could be discounted.

Recreational pressure / disturbance

7.73 The operation of the Draft Local Plan is considered likely to cause recreational disturbance effects on the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA because new homes planned for in the 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.

7.74 This impact has already been assessed as part of the HRA for Places for Everyone. The PfE HRA assessed the impacts of the projected increases in housing numbers on recreational disturbance on the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA across the whole of the PfE Plan area, which included Oldham.

7.75 It was concluded in the PfE HRA that mitigation was required for impacts arising from recreational disturbance.

7.76 While there have been marginal changes in the projected housing numbers to be delivered in Oldham during the Draft Local Plan period as compared to the housing numbers assessed in the PfE HRA, these changes are considered to be de minimis in relation to potential recreational disturbance impacts on the upland designated sites.

7.77 The conclusions and recommendations of the HRA of the PfE are therefore considered applicable in this instance and the proposed mitigation for these impacts is also considered to be applicable to the Oldham Draft Local Plan.

Proposed Mitigation

7.78 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 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.

7.79 SANGS are areas of greenspace established with the aim of providing access to greenspace and outdoor recreation to reduce pressure on sensitive ecological sites.

7.80 They are an established mechanism for mitigating recreational disturbance effects on designated sites. The SAMMS can provide details of the required mitigation and could include:

- On-the-ground dedicated staff to supplement existing warden efforts.
- Education and awareness raising programmes and materials to change visitor perceptions of the Moors and to influence visitor behaviour.
- The creation of new volunteering opportunities for habitat and visitor management.
- New infrastructure, including signage, dog bins, footpath improvements etc.
- Monitoring of visitor usage of SANGs and South Pennine Moor SAC/SPA.
- Monitoring bird populations and distribution within the SPAs.

7.81 The SAMMS and SANG measures will be funded through developer contributions on planning permission for new development. It is anticipated that the full details of the developer contribution funding mechanism could be developed through a Supplementary Planning Document (SPD) outlining —

- The amounts of required contributions.
- The type and size of development to which developer contributions would apply to.
- Further details about the costs of mitigation activities.
- The SPD could also set out a framework for the provision of SANG.

7.82 These mitigation proposals are also applicable to the potential impacts of the Local Plan.

7.83 The recommended SPD is currently in preparation (as at November 2023) in collaboration with Rochdale and Tameside Council's and the Greater Manchester Combined Authority.

7.84 Notwithstanding the above conclusion, there are several policies within the Draft Local Plan which will act to mitigate any possible increases in air pollution, and which will serve to protect designated sites. These policies include –

- Policy N1 specifically protects designated sites from any harm; and
- Policy N3 will enhance local green infrastructure, reducing the need to travel for outdoor leisure.

Air pollution (arising from increased road traffic)

7.85 The HRA of the PfE concluded that there would be no Likely Significant Effects on the Rochdale Canal SAC, South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA resulting from air pollution.

7.86 The PfE HRA did conclude that there may be air pollution impacts from the operation of the Plan on the Manchester Mosses SAC and advised that mitigation was required for this impact. Mitigation was added to PfE Policy JP-C7 requiring Transport Assessments where needed to consider air quality impacts on Holcroft Moss within the Manchester Mosses SAC as follows:

'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). Any proposals that would result in increased traffic flows on the M62 past Holcroft Moss of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day must devise a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles and provide a contribution towards restoration measures in accordance with the Holcroft Moss Habitat Mitigation Plan'.

7.87 The proposed mitigation would apply to developments within Oldham.

The HRA notes Draft Local Plan policies which may also help prevent an increase in air pollution.

Direct impact (sites within 200m of the Rochdale Canal SAC)

7.88 Certain allocations within 200m of the Rochdale Canal may have direct impacts on the special interest of the Canal, including water pollution resulting from site drainage and shading of canal waters.

7.89 The sites / areas within 200m of the Canal are:

- Former Junction Mill
- Land at Foxdenton
- Former South Chadderton School
- Greengate/Broadgate Chadderton
- Hollinwood Business District

7.90 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.

7.91 Draft Local Plan Policy N1 would apply to developments on these sites and this policy would serve to avoid significant effects on the special interest of the Canal.

Consideration of 'In Combination' Effects with Other Plans and Proposals

7.92 Cumulative impacts have been considered, with a conclusion that no in-combination effects will arise from the operation of the Oldham Draft Local Plan, providing that mitigation is provided for recreational disturbance effects on the South Pennines.

Further HRA

7.93 It is recommended that if any changes are made to the Plan as a result of either the public consultation, at Publication Plan stage or during any future Examination in Publication, the HRA will need to be revisited and revised to ensure that these changes would not result in a significant effect on any European Site.

8. CONCLUSIONS

- 8.1 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.
- 8.2 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 PfE and other policies in the Draft Local Plan. The Local Plan must be read as a whole.
- 8.3 The HRA has screened the Draft Local Plan and undertaken appropriate assessment. The HRA has also outlined measures to mitigate any significant effects.
- 8.4 A further IA will be undertaken on the Local Plan Review at Publication stage.

9 APPENDICES

9.1 The below appendices form part of the IA. However, they are being published as separate documents due to the size of the IA.

Appendix 1: IA of Vision

Appendix 2: IA of Plan Objectives

Appendix 3: IA of Homes Policies

Appendix 4: IA of Economy and Employment Policies

Appendix 5: IA of Tourism Policies

Appendix 6: IA of Our Centres Policies

Appendix 7: IA of Oldham Town Centre Policies

Appendix 8: IA of Addressing Climate Change Policies

Appendix 9: IA of Natural Environment and Open Land Policies

Appendix 10: IA of Addressing the Biodiversity Emergency Policies

Appendix 11: IA of Oldham's Historic Environment Policies

Appendix 12: IA of Creating a Better and Beautiful Oldham

Appendix 13: IA of Creating a Sustainable, Active, Accessible Network for

Oldham Communities Policies

Appendix 14: IA of Communities Policies

Appendix 15: IA of Protecting Our Local Environment Policies

Appendix 16: IA of Infrastructure and Delivery in Oldham Policies

Appendix 17: IA of Site Allocations

Appendix 18: Oldham Impact Assessment (incorporating Equalities Impact

Assessment)

Appendix 19: Health Impact Assessment

Appendix 20: Habitats Regulations Assessment