

# Oldham

# Local Plan

**Draft Local Plan: Historic  
Environment Topic Paper**

**December 2023**



**Oldham**  
Council

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## 1. Introduction and Purpose

- 1.1. This is the Historic Environment Topic Paper and is one of ten topic papers produced to inform the consultation on the Oldham Local Plan: Draft Plan.
- 1.2. All of the papers can be found the Oldham Council website at [Oldham Council website](#)<sup>1</sup>.
- 1.3. The topic papers set out how the preferred option for each policy under the relevant Draft Local Plan 'Chapter' has been developed. As such, the topic papers support and complement the Draft Plan consultation document as they provide a detailed explanation of the basis for each preferred policy approach. The policies are presented in a consistent format in each paper with sufficient information to provide a comprehensive appreciation of the background to, and development of, the preferred option.
- 1.4. The topic papers set out the national, regional and local planning context and then for each policy, or group of policies where relevant, the topic paper details how comments received to the Issues and Options consultation and relevant evidence have helped to shape the proposed policy approach. Including how this has also been informed by the findings of the Integrated Assessment. There are also details of further work that may be required to inform the next stage of the plan-making process – the Regulation 19 Publication Plan.
- 1.5. The preparation of a Local Plan must be informed by consultation and engagement as well as statutory processes, such as Integrated Assessment and Habitats Regulations Assessment, and address the requirements of national planning policy. These important elements of plan-making have, therefore, informed development of the Draft Local Plan and helped to shape the proposed policy approach. These supporting documents are available to view on the [Oldham Council website](#).

## 2. Context

- 2.1. This section sets out the key national planning policies that relate to Oldham's Historic Environment and which have informed the policy approach taken. It also looks at the regional context – in the main this is the Places for Everyone Joint Development Plan, however there may be other policies and programmes of relevance, and local policies and programmes, in particular how the policy or policies will help to Create a Better Place.

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<sup>1</sup> Available at: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/3095/draft\\_local\\_plan](https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan)

## National

### National Planning Policy Framework (Department for Levelling Up, Housing and Communities, December 2023)

- 2.2. [National Planning Policy Framework](#)<sup>2</sup> (NPPF) recognises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to quality of life.
- 2.3. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. The strategy should take into account:
- The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
  - The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
  - The desirability of new development making a positive contribution to local character and distinctiveness; and
  - Opportunities to draw on the contribution made by the historic environment to the character of place.
- 2.4. In terms of Conservation Areas NPPF states that Local Planning Authorities (LPAs) should ensure that an area justifies such status because of its special architectural or historic interest.
- 2.5. LPAs should have access to a historic environment record. This should contain up to date evidence about the historic environment and be used to:
- assess the significance of heritage assets and the contribution they make to their environment; and
  - predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.
- 2.6. LPAs should make information available about the historic environment, gathered as part of policy making or development management publicly accessible.

### Planning Practice Guidance (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government)

- 2.7. The [planning practice guidance](#)<sup>3</sup> (PPG) expands upon what is meant by the conservation and enhancement of the historic environment.
- 2.8. Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed

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<sup>2</sup> This document can be found at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>3</sup> This guidance can be found at: <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

buildings in every day use and as yet undiscovered, undesigned buried remains of archaeological interest.

- 2.9. Generally, the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary.
- 2.10. Where changes are proposed, PPG states that NPPF sets out a clear framework to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development.
- 2.11. Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So, where the complete or partial loss of a heritage asset is justified, the aim then is to capture and record the evidence of the asset's significance which is to be lost; interpret its contribution to the understanding of our past; and make that publicly available.
- 2.12. The Local Plan should set a positive strategy for the conservation and enjoyment of the historic environment. This should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting.
- 2.13. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in the local area.
- 2.14. This may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. LPAs will need to consider the relationship and impact of other policies on the delivery of the strategy for conservation.
- 2.15. Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if LPAs keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies.

### **Historic Environment Good Practice Advice in Planning Note 1 (Historic England, 2015)**

- 2.16. The [Historic Environment Good Practice Advice in Planning Note 1](#)<sup>4</sup> intends to help implement the historic environment policy in NPPF and related guidance.
- 2.17. The note highlights the need to:

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<sup>4</sup> This note can be found at: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

- consider heritage assets outside a local authority area if there are setting impacts;
  - consider assets not well recorded such as Historic Parks and Gardens;
  - consider evidence that may help identify areas for designation as a Conservation Area or local listing; and
  - assess the likelihood of currently unidentified heritage assets.
- 2.18. The note outlines sources of evidence and highlights the importance of making this public.
- 2.19. The advice note states that NPPF requires a positive strategy for the conservation and enjoyment of the historic environment. This requires a plan for maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) that make a positive contribution to local character and distinctiveness.
- 2.20. Stand alone policies on heritage will not achieve this – policies for local housing, retail and transport may need to be tailored to achieve positive improvements in the historic environment.
- 2.21. The Local Plan should consider the inter-relationship between the historic environment and objectives to:
- Build a strong, competitive economy;
  - Ensure the vitality of town centres;
  - Support a prosperous rural economy;
  - Promote sustainable transport;
  - Deliver a wide choice of high quality homes;
  - Require good design;
  - Protect Green Belt land;
  - Meet the challenge of climate change, flooding and coastal change;
  - Conserve and enhancing the natural environment; and
  - Facilitate the sustainable use of minerals.
- 2.22. The note highlights the need to assess whether or not the Local Plan should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment, for example tall buildings within identified view corridors.
- 2.23. There may be the need for development management policies as well as strategic policies.
- 2.24. The note also outlines the importance of screening site allocations to avoid harming the significance of heritage assets and their settings and to inform the nature of allocations so development responds to local character. Other issues may need to be taken into account such as cross boundary issues and the need for Duty to Cooperate and the cumulative impact of incremental small scale change.

## **The Historic Environment and Site Allocations in Local Plans (Historic England Advice Note 3, 2015)**

2.25. [The Historic Environment and Site Allocations in Local Plans Note 3](#)<sup>5</sup> offers advice for each of the key stages in the site allocation process consisting of 1) evidence gathering 2) site selection and 3) site allocation policies.

### *Stage 1: Evidence Gathering*

2.26. This highlights that evidence gathering should begin before starting work on the plan to provide baseline information. The relevant Historic Environment Record (HER) and other evidence will help establish the baseline information.

2.27. This will help identify heritage assets affected and the gaps in evidence where there may be a need to produce further information to understand possible impacts of potential site allocations on the historic environment. It should relate to both designated and non-designated assets and be used to inform the Integrated Assessment.

2.28. Evidence could include:

- Characterisation work to understand the potential impact of site allocations on historic places and inform assessments of an area's capacity to accommodate development.
- The updating of existing information, such as the production of a more detailed study on the significance of heritage assets, including assessment of their setting, an assessment to understand heritage impacts in greater detail or the identification of new heritage assets.
- Site specific studies, such as archaeological desk based assessment and fieldwork, may also be necessary to provide adequate information.

### *Stage 2: Site Selection*

2.29. The site selection process needs to be detailed enough to:

- Support the inclusion of appropriate sites for development (including those which could enhance the historic environment), or;
- Justify the omission of a site where there is identified harm to the historic environment, and;
- Set out clear criteria for sites that are acceptable in principle, within which they can be appropriately developed in terms of impact on heritage assets, for example, its size, design, or density.

2.30. The advice outlines that understanding the impact on a heritage asset involves more than just identifying known heritage assets, it involves a holistic process which seeks to understand their significance and value. A focus on distance or visibility alone is

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<sup>5</sup> This note can be found at: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

not appropriate. Site allocations may include a heritage asset and may enhance it or tackle heritage at risk, conversely an allocation at significance distance away from the heritage asset may cause harm to its significance.

### *Stage 3: Site Allocation Policies*

- 2.31. Site allocation policies should include clear references to the historic environment and specific heritage assets where appropriate. The amount of detail is dependent on the nature of the development proposed, and the size and complexity of the site. However, the policies should include information on what is expected, where it will happen on the site and when development will come forward including phasing. Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.
- 2.32. The advice note sets out detailed methodology for site selection which includes five steps:
- Step 1 Identify which heritage assets are affected by the potential site allocation;
  - Step 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s);
  - Step 3 Identify what impact the allocation might have on that significance;
  - Step 4 Consider maximising enhancements and avoiding harm; and
  - Step 5 Determine whether the proposed site allocation is appropriate in light of NPPF's tests of soundness.

## **Regional**

### **Places for Everyone (Greater Manchester Combined Authority (GMCA), September 2023)**

- 2.33. The [Places for Everyone](#)<sup>6</sup> (PfE) Joint Development Plan Document (DPD), is a strategic plan that will, upon adoption, cover nine of the ten Greater Manchester districts - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Plan:
- Provides the strategic framework for the Oldham Local Plan;
  - Sets out specific requirements to be taken forward through the Oldham Local Plan in relation to housing, offices, and industry and warehousing, and identifies the main areas where this will be focused;
  - Identifies the important environmental assets which will be protected and enhanced;
  - Allocates sites for employment and housing outside of the urban area – in Oldham this is JPA2 Stakehill, JPA12 Beal Valley, JPA13 Bottom Field Farm, JPA14 Broadbent Moss, JPA15 Chew Brook Vale, JPA16 Cowlshaw, JPA17 Land south of Coal Pit Lane' and JPA18 South of Rosary Road;

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<sup>6</sup> PfE can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/>



- Supports the delivery of key infrastructure, such as transport and utilities; and
  - Defines a new Green Belt boundary for the borough.
- 2.34. Upon adoption PfE will form part of the development plan for Oldham. PfE will set the strategic policies and direction for the borough. Oldham's Local Plan interprets these at a more detailed local level to reflect our priorities and support delivery of the council's regeneration ambitions and Creating a Better Place.
- 2.35. When considering development proposals and what needs to be taken account of in the determination of planning applications regard must therefore be had to both PfE and Oldham's Local Plan.
- 2.36. The most relevant PfE policies relating to the historic environment are:
- 2.37. **Policy JP-P1 Sustainable Places** aims for Greater Manchester to become one of the most liveable city regions on the world, consisting of a series of beautiful, healthy and varied places, each having the following key attributes that all development, wherever appropriate, should be consistent with:
1. Distinctive, with a clear identity that:
    - A. Conserves and enhances the natural environment, landscape features, historic environment and local history and culture;
    - B. Enables a clear understanding of how the place has developed; and
    - C. Respects and acknowledges the character and identity identify of the locality in terms of design, siting, size, scale and materials used.
- 2.38. **Policy JP-P2: Heritage** states we will proactively manage and work with partners to positively conserve, sustain and enhance our historic environment and heritage assets and their settings. Opportunities will be pursued to aid the promotion, enjoyment, understanding and interpretation of heritage assets, as a means of maximising wider public benefits and reinforcing Greater Manchester's distinct character, identity and sense of place.
- 2.39. Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness and which should be the priority for conserving and enhancing in the future and demonstrate a clear understanding of the historic environment and the heritage values of sites, buildings or areas and their relationship with their surroundings. This knowledge should be used to inform the positive management and integration of our heritage by:
1. Setting out a clear vision that recognises and embeds the role of heritage in place-making;
  2. Ensuring that the heritage significance of a site or area is considered in accordance with national planning policy in the planning and design process and opportunities for interpretation and local engagement are optimised;

3. Integrating the conservation and enhancement of heritage assets and their settings, with creative contextual architectural responses that contribute to their significance and sense of place;
  4. Delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing; and
  5. Exploring opportunities to reduce greenhouse gas emissions that restoration of historic buildings offer.
- 2.40. Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. These include historic town centres, places of worship, historic transport routes including the canal network, industrial buildings and structures including textile mills, farmsteads and other sites, buildings, and areas of identified archaeological, architectural, artistic and / or historic value.
- 2.41. Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.
- 2.42. Where heritage assets have been identified as being at risk, Local Plans should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use. Development proposals which will help safeguard the significance of and secure a sustainable future for Greater Manchester's heritage at risk will be supported in principle, provided they are not contrary to national policy or other policies in the development plan.
- 2.43. Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process.
- 2.44. **Policy JP-P3: Cultural Facilities** states we will proactively develop and support cultural businesses and attractions in our cities and towns through a range of measures, where appropriate, including:
1. Protecting existing heritage, cultural and community venues, facilities and uses;
  2. Supporting the development of new cultural venues in town centres and places with good public transport connectivity;
  3. Promoting new, or enhancing existing, locally-distinct clusters of cultural facilities, especially where they can provide an anchor for local regeneration and town centre renewal;
  4. Identifying, protecting and enhancing strategic clusters of cultural attractions;
  5. Considering the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres;

6. Maximising opportunities for redundant heritage assets and the role they can play in economic and social well-being;....

## Local

### The Oldham Plan

- 2.45. The Oldham Plan '[Our Future Oldham - A shared vision for 2030](#)'<sup>7</sup> (Oldham Partnership, 2023) prepared by the Oldham Partnership, sets the direction for the borough. With a focus on 'residents first', the Plan seeks to ensure that residents are at the heart of decision-making.
- 2.46. Consultation carried out to inform preparation of The Oldham Plan found that residents want services close to home and tailored to meet the specific needs of their community. The contributions emphasise a desire for Oldham to be a clean, green and safe place where public transport allows access to opportunities, activities for young people and communities and where people felt part of the city region.
- 2.47. The main aim of the Oldham Partnership, through the Plan, is to 'uplift every resident', so that we all have:
  - A well-rounded, enriching, life-long education
  - The opportunity to get a decent job that pays well and offers security and flexibility
  - Quick, cheap and easy transport to every part of the city region
  - A home that is affordable, well-maintained and appropriate
  - Timely access to vital services to keep people healthy and safe
  - A clean, green and healthy environment
  - Diverse opportunities to get together, with regular activities to boost physical and mental health and community spirit
  - A local area that meets people's needs and makes them proud

### Oldham Council Corporate Plan

- 2.48. The Oldham Council [Corporate Plan 2022-27](#)<sup>8</sup> sets out the council's priorities, with specific actions for 2022-25. It works in parallel with The Oldham Plan and sets out what its priorities mean for Oldham:

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<sup>7</sup> The Oldham Plan can be found at:

[https://www.oldham.gov.uk/downloads/file/7589/the\\_oldham\\_plan\\_-\\_our\\_future\\_oldham](https://www.oldham.gov.uk/downloads/file/7589/the_oldham_plan_-_our_future_oldham)

<sup>8</sup> The Corporate Plan can be found at:

[https://www.oldham.gov.uk/downloads/file/7405/oldham\\_corporate\\_plan\\_2022-27](https://www.oldham.gov.uk/downloads/file/7405/oldham_corporate_plan_2022-27)

- Healthy, safe and well supported residents
- A great start and skills for life
- Better jobs and dynamic businesses
- Quality homes for everyone
- A clean and green future

2.49. Delivering against these priorities means that the council can help residents and make Oldham the best place it can be.

2.50. The Corporate Plan specifically references the Oldham Mills Strategy and the reuse of these assets.

**Creating a Better Place**

2.51. The Local Plan represents the spatial expression of The Oldham Plan and the council’s Corporate Plan. Their aspirations and priorities are the golden thread that runs through the Plan, along with supporting and facilitating the delivery of the council’s ambitious Creating a Better Place agenda which is embedded into the planning framework provided through the policies as illustrated in Figure 1 below.

Figure 1: Flow diagram illustrating how the council's Creating a Better Place agenda has been embedded into the planning framework.



- 2.52. Through delivering Oldham Council's bold vision for Oldham Town Centre and the wider borough and the ambitions of Creating a Better Place by 2030 Oldham will be a place where business and enterprise can thrive and where people will want to live, visit, relax and work.
- 2.53. Building on its industrial heritage, civic pride and location as a gateway into the countryside, Oldham will have a sustainable future in a unique urban setting. Oldham will be a stronger economic contributor to Greater Manchester, providing a place where every resident is enabled to contribute to and benefit from the continued growth of the city region.
- 2.54. Underneath the overarching theme of Creating a Better Place there sits several key issues that policies within the Local Plan seek to address such as the creation of healthy communities and tackling the climate emergency.
- 2.55. The policies set out within the Local Plan also provide a robust framework for ensuring that all development proposals mitigate the impact of climate change, make their contribution to meeting nationally binding targets to reduce greenhouse emissions and increase resilience. Policies relating to the historic environment will:
- Ensure the effective and efficient use of land, reusing existing buildings and materials where possible, including making the most of our mill legacy, and ensuring that housing developments meet minimum density requirements.

### **Oldham Mills Strategy (Oldham Council, 2021)**

- 2.56. The Local Plan is underpinned by the [Oldham Mills Strategy](#)<sup>9</sup>, which was commissioned by Oldham Council and Historic England in order to develop a positive strategy for the sustainable future of the textile mill stock across Oldham.
- 2.57. The Oldham Mills Strategy identifies the non-designated mills across Oldham which are of particular landscape and heritage value and sets out a robust strategy to ensure their sustainable future, which considers their potential for future development for residential, employment and other uses.
- 2.58. Further details on the Mills Strategy are found under the evidence for Policy HE4.

## **3. Consultation Feedback**

### **Regulation 18 Notification Consultation**

- 3.1. To begin preparation of the Local Plan the council carried out a Regulation 18 Notification between July and August 2017.
- 3.2. To inform this work we asked what the local community and stakeholders thought:

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<sup>9</sup> The strategy can be found at:  
[https://www.oldham.gov.uk/info/201236/evidence/2819/oldham\\_mills\\_strategy](https://www.oldham.gov.uk/info/201236/evidence/2819/oldham_mills_strategy)

- a) the Local Plan should contain and what the key planning issues are for Oldham; and
- b) what, in broad terms, should be the main aims of the Local Plan.

3.3. In addition, we published our Integrated Assessment Scoping Report and invited the Environment Agency, Historic England and Natural England to comment on the scope of the Local Plan. This was also available for the local community and stakeholders to view and comment on if they wished.

3.4. The main messages that came out of the Regulation 18 Notification consultation regarding the historic environment were:

- Heritage is an asset in the borough and should be used to enhance the borough and protect distinctiveness.
- There is a need to ensure the conservation and enhancement of the historic environment.
- There is a need to ensure new sites do not have an adverse impact on heritage assets.

### **Regulation 18 Issues and Options Consultation**

3.5. The Oldham Local Plan: Issues and Options consultation in 2021 identified the built environment as one of the key themes for the new Local Plan to address.

3.6. The consultation identified the above key issues in the Issues and Options document.

3.7. As part of the consultation, we asked you:

- Do you agree that the policies map should incorporate the proposed extensions to the Oldham Town Centre conservation area?
- Are there any other particular policy areas the Local Plan needs to address in relation to heritage?
- Should there be localised (district level) heritage policies for different parts of Oldham?
- Do you agree with the policy approach to high, medium and low priority mills and mill clusters? Is there alternative or further criteria you feel needs to be included?

3.8. We have reviewed the responses you gave us, and you will find the issues raised in relation to the historic environment summarised in this topic paper below.

## **4. Historic Environment and the Draft Local Plan**

4.1. Key policy areas have been identified that are addressed in this topic paper. For each of these, further detail is provided on how comments received to the Issues and Options consultation and relevant evidence have helped to shape the proposed policy approach and how this has also been informed by the findings of the Integrated Assessment. There are also details of further work that may be required to inform the next stage of the plan-making process – the Regulation 19 Publication Plan.

## 5. Policy HE1 The Historic Environment and Policy HE2 Securing the Preservation and Enhancement of Oldham's Heritage Assets

### Feedback from Issues and Options consultation

- 5.1. The consultation responses at Issues and Options stage were specific to the above questions that were asked, therefore in relation to the content within policies HE1 and HE2, consultation feedback was more limited at this stage.
- 5.2. Historic England considered that the issues identified at Issues and Option stage were relevant to the historic environment for Oldham and would set out a positive strategy for its conservation and enhancement if translated into policy through the Local Plan.
- 5.3. In addition, through duty to cooperate the council has liaised informally with Historic England in drafting the policies since Issues and Options stage.

### Issues to be addressed

- 5.4. Issues to be addressed on the historic environment were summarised in the Built Environment topic paper at Issues and Options stage. Relevant to the above policies these included:
  - There is the need to ensure the Local Plan provides a positive framework to ensure the conservation and enhancement of the historic environment and to ensure development does not have an adverse impact on heritage assets and their settings.
- 5.5. The Scoping Report has since been updated (Update 2) and identifies the issues to be addressed include:
  - protect, conserve and enhance the historic environment, including their wider settings and to preserve and conserve archaeological heritage.

### Evidence Base

- 5.6. The Oldham Mills Strategy, Oldham Town Centre Conservation Area Appraisal and Management Plan (CAAMP) Supplementary Planning Document (SPD) support policies HE1 and HE2. This evidence is discussed in more detail under Policies HE3 and HE4.
- 5.7. Greater Manchester Archaeological Advisory Service holds the Historic Environment Record for Greater Manchester, and this also forms part of Oldham's evidence base.

### Proposed Policy Approach and Reasons

#### Policy HE1 – The Historic Environment

- 5.8. The policy provides an overarching statement of how the council will seek to enhance the historic environment including through:
  - preserving and enhancing heritage assets;
  - promoting and supporting heritage-led regeneration;

- producing or updating conservation area management plans;
- enhancing Oldham Town Centre conservation area aiming to remove it from the 'at risk' register;
- managing development that affects conservation areas;
- identifying non designated heritage assets;
- implementing the Oldham Mills Strategy;
- protecting and enabling restoration of the canal; and
- an increased understanding and enjoyment of the historic environment.

5.9 This policy was developed in response to an informal suggestion by Historic England that it would be beneficial to have an overarching policy for Oldham's historic environment that sets out what Oldham wants to achieve to set a positive direction for the historic environment. It brings together some of the key strands of work that the council has been proactively working on to preserve and enhance Oldham's historic environment such as the Oldham Mills Strategy.

### **Policy HE2 - Securing the Preservation and Enhancement of Oldham's Heritage Assets**

5.10 The policy sets out:

- that proposals will be supported that preserve and enhance heritage assets and their settings;
- how proposals must identify the degree of harm to the significance of the asset;
- the public benefits of the proposal;
- steps which the council may take to ensure restoration or maintenance of heritage assets at risk;
- the sympathetic design of the development;
- details of conserving archaeology;
- recording of heritage assets; and
- supplementary information to accompany planning applications.

5.11 Appendix 11 in the Local Plan adds further detail on the scale of harm to designated heritage assets. This policy expands on NPPF and provides additional clarity for applicants and planning officers when assessing development proposals.

### **Integrated Assessment**

5.12 Policies HE1 and HE2 both scored positively or neutral. No mitigation or enhancements to the policy were required as a result of the IA process. The policies were not screened in by the HRA.



## Policy HE3 Development proposals affecting conservation areas

### Feedback from Issues and Options consultation

5.13 Comments at Issues and Options included the following:

- The preparation of localised policies was supported. Historic England stated they would be happy to support the council with this; and
- Concerns that restrictions on conservation areas are not being respected.

### Issues to be addressed

5.14 There are 36 conservation areas in the borough covering 250.79 hectares. The existing conservation areas were designated in the 1970s and 1980s and with the exception of Oldham Town Centre would benefit from updated appraisals and management plans, particularly as 20 conservation areas in the borough are 'vulnerable'. Management Plans will ensure that identified risks are appropriately managed to prevent further conservation areas from being identified on the 'at risk' register.

5.15 This policy also responds to the issue identified at Issues and Options stage in the Built Environment topic paper that there was a need to implement the Oldham Town Centre CAAMP SPD.

5.16 The Scoping Report has since been updated (Update 2) and identifies the issues to be addressed include:

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

### Evidence Base

5.17 The policy expands on NPPF to provide clarity on assessing development proposals which affect a conservation area.

5.18 The Oldham Town Centre [CAAMP SPD](#)<sup>10</sup> has been partly incorporated into this policy. Although Policy HE3 applies to all conservation areas within Oldham's planning boundary and not just that of Oldham Town Centre it is considered that the guidance on shopfronts, retail frontages and signage from the CAAMP could be applicable to all conservation areas.

### Proposed Policy Approach and Reasons

5.19 The policy sets out the requirements that development proposals within a conservation area or affecting the setting of a conservation area must meet. Details are provided on:

- design of proposals;
- retaining building plots;
- protecting street patterns; and
- changes of use.

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<sup>10</sup> The Oldham Town Centre CAAMP can be found at:  
[https://www.oldham.gov.uk/downloads/download/1599/oldham\\_town\\_centre\\_conservation\\_area\\_appraisal\\_and\\_management\\_plan\\_caamp\\_supplementary\\_planning\\_document\\_spd](https://www.oldham.gov.uk/downloads/download/1599/oldham_town_centre_conservation_area_appraisal_and_management_plan_caamp_supplementary_planning_document_spd)

- 5.20 This part of the policy expands on NPPF to provide clarity on assessing development proposals which affect a conservation area.
- 5.21 The policy then has a specific section on shopfronts, retail frontages and signage within conservation areas with criteria that proposals must meet.
- 5.22 This part of the policy has been informed by the Oldham Town Centre CAAMP SPD and has taken the guidance within the management plan on shopfronts, retail frontages and signage to apply it to all conservation areas within the borough.
- 5.23 It is felt that this is reasonable as the policy will ensure that conservation areas are not affected by detracting elements such as poor signage, which can have a negative impact on the experience of the conservation area as a whole, as is the case in Oldham Town Centre, where poor quality shopfronts are cited as one of the reasons for the 'at risk' condition of the conservation area. The IA Scoping Report highlights that 20 of Oldham's conservation areas are 'vulnerable' and whilst conservation appraisals and management plans for these are needed the policy will help manage proposals for shopfronts, signage and retail frontages in the interim.

### Integrated Assessment

- 5.24 Policy HE3 scored positively or neutral. No mitigation or enhancements to the policy were required as a result of the IA process. The policy was not screened in by the HRA.

## Policy HE4 Oldham's Mills

### Feedback from Issues and Options consultation

- 5.25 A mixed response was received to the question on the proposed policy approach to high, medium and low priority mills and mill clusters.
- 5.26 Historic England stated that they have worked in close collaboration with the council in preparing a mills strategy for Oldham. Mills are fundamental to the character of Oldham and the wider borough, with the town growing from a small Pennine community at the start of 19th century to become the country's most important centre for cotton spinning by the middle of that century. This has shaped the evolution of the town including its housing stock, civic buildings and architecture and shaped communities to this day. Since the decline of the cotton industry many mills have been lost and with important elements of Oldham's distinctive vernacular and character. A policy approach which seeks to retain those mills which are significant either as designated or non-designated heritage assets either individually or as part of a cluster of important mills is an important issue for the Local Plan.
- 5.27 Historic England noted that at Issues and Options stage they would continue to work with the council in identifying an appropriate Local Plan policy which is consistent with national policy on the conservation and enhancement of the historic environment. They generally support an approach which seeks to conserve mill stock in a manner appropriate to their significance, a mechanism for this which categorises mill buildings in order of priority supported by a robust evidence base we believe can be justified.

## Issues to be Addressed

- 5.28 The future use of textile mills has been identified as an important policy area that is a specific for Oldham to address. It is important to ensure the textile mills have a sustainable future, which considers their potential for future development focussing on residential and employment uses.
- 5.29 This is also part of our positive approach to making the most efficient use of brownfield land and existing buildings, reducing the need for additional pressure on greenfield sites and reducing our carbon footprint. The reuse of mills can add to local distinctiveness as part of place making, attract investment and help retain Oldham's strong identity and culture.

## Evidence Base

- 5.30 The policy is underpinned by the Oldham Mills Strategy<sup>11</sup> (2022). The Oldham Mills Strategy was commissioned by Oldham Council and Historic England in order to develop a positive strategy for the sustainable future of the textile mill stock across Oldham.
- 5.31 The Oldham Mills Strategy identifies the non-designated mills across Oldham which are of particular landscape and heritage value and sets out a robust strategy to ensure their sustainable future, which considers their potential for future development for residential, employment and other uses.
- 5.32 This is also part of our positive approach to making the most efficient use of brownfield land and existing buildings, reducing the need for additional pressure on greenfield sites and reducing our carbon footprint. The reuse of mills can add to local distinctiveness as part of place making, attract investment and help retain Oldham's strong identity.
- 5.33 The Mill Strategy sets out policy recommendations for the conservation of the mill stock based on levels of priority relative to the landscape and heritage value of individual mills. The strategy also sets out a number of key actions to support the council in ensuring the sustainable future of the mill stock.
- 5.34 The Mills Strategy assessed:
- Needs analysis (housing and employment) (section 3);
  - Landscape (section 4);
  - Heritage significance (section 5);
  - Housing potential (section 6); and
  - Employment potential (section 7).
- 5.35 Section 8 categorises individual mills as high, medium or low priority based upon the landscape, heritage and housing / employment assessments.
- 5.36 Section 9 summarises findings of the study and outlines key policy recommendations.

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<sup>11</sup> This document can be found at:  
[https://www.oldham.gov.uk/info/201236/evidence/2819/oldham\\_mills\\_strategy](https://www.oldham.gov.uk/info/201236/evidence/2819/oldham_mills_strategy)

- 5.37 A separate report feeding into the Mills Strategy is a landscape overview providing an overall analysis of the contribution existing mills make to the landscape character of Oldham.
- 5.38 A draft mills policy formed part of the Mills Strategy and the council has embedded this within the Draft Local Plan for consultation. Only minor amendments were made which included removing any mills which had been demolished since the Mills Strategy was prepared. There were originally seven mill clusters within the mills strategy recommended policy however one of the clusters has since been removed in the policy approach as planning approval was given for the demolition of Thornham Mill and Fir Mill, which meant that the 'cluster' of mills could not be justified. Fir Mill has since been demolished.
- 5.39 The Local Plan also acknowledges that permission has been granted for the demolition of a number of mills within Cluster 1 and the latest position regarding this will be reflected at Publication Plan stage.
- 5.40 Mills will only be removed from the policy where they have been demolished and not where they have consent to be demolished, but demolition has not started. This approach has been agreed with Historic England.
- 5.41 The policy focuses on non-designated mills, with the exception of the mill clusters. Mills that are listed (or in conservation areas) are already protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 and covered by other planning policies.

### Proposed Policy Approach and Reasons

- 5.42 The policy sets out the approach to proactively support proposals that establish a positive future for Oldham's Textile Mills through their reuse and repair. The policy sets out that development proposals will be assessed having regard to the high, medium and low criteria relevant to the identified level of priority and clusters contained within the Oldham Mills Strategy.
- 5.43 The policy also identifies mill clusters and outlines that development proposals which detract from them will not be supported without convincing justification.
- 5.44 The Mills strategy including the recommended policy was subject to targeted consultation as part of the preparation of the Mills Strategy. This included landowners, planning agents and historic environment interest groups. Consultation responses fed into the final Mills Strategy.
- 5.45 The draft policy was also inserted into the Local Plan Issues and Options and subject to consultation. No alternative policy approaches were suggested although some respondents stated that they didn't agree with a policy protecting mills or that only a handful of mills should be retained and instead the land should be made available for new housing. However, this would not be consistent with NPPF. Other respondents stated support including Saddleworth Parish Council.

## Integrated Assessment

- 5.46 Policy HE4 scored positively or neutral. No mitigation or enhancements to the policy were required as a result of the IA process. The policy was not screened in by the HRA.

## Policy HE5 Canals

### Feedback from Issues and Options consultation

- 5.47 The Canal and River Trust had provided comments on the Scoping Report at Regulation 18 Notification stage which informed the issues to address within the IA and Issues and Options.
- 5.48 At Issues and Options stage there were only a few comments in relation to canals which highlighted that at the Rochdale Canal land could be set aside for food growing and that some saved allocations are within close proximity to the Rochdale Canal SAC and SSSI.
- 5.49 There were no comments in relation to the canals as heritage assets specifically.

### Issues to be addressed

- 5.50 The Built Environment Topic Paper at Issues and Options stage highlighted the need to ensure that the canal network is integrated into the Green Infrastructure network and policy detail to ensure that its heritage interest can be protected and enhanced.
- 5.51 The Local Plan recognises that the canals form part of the borough's green infrastructure network and are also non-designated heritage assets, which formed an important part of Oldham's industrial legacy, providing transport links to the mills.
- 5.52 The conservation, development and improved access to Oldham's canal corridors will allow for the community and visitors to celebrate the unique industrial heritage of these historic manmade waterways.

### Evidence Base

- 5.53 The canals were noted when assessing the significance and sense of place of the mills in the Mills Strategy. This informed the overall scoring and prioritisation of the non-designated mills.

### Proposed Policy Approach and Reasons

- 5.54 The policy identifies the canals in Oldham as non-designated heritage assets and how proposals shall not prevent its restoration, conservation and enhancement of the waterway's heritage. Green Infrastructure incorporating walking and cycling routes and heritage interpretation features along its line should be provided.
- 5.55 The policy sets out that proposed development that harms the setting or appearance of the canal will not be supported. Any new development should respect the canal frontage, ensuring active quality elevations, whilst respecting the unique character of the waterway and its associated heritage assets. Opportunities should be taken to improve the appearance and vitality of the canal side environment.

## Integrated Assessment

- 5.56 Policy HE5 scored positively or neutral. No mitigation to the policy was required as a result of the IA process. The policy was not screened in by the HRA.
- 5.57 In relation to IA1 (biodiversity and green infrastructure) and IA2 (open space) the policy wording was amended from open space to green infrastructure, which enhanced the policy.

## 6. Further Work and Next Steps

- 6.1 Between the Draft Plan stage and Publication Plan stage further work will be required on the site allocations and historic environment assessment to ensure that sites are appropriately screened and where necessary mitigation and / or enhancement is identified to support development sites taken forward for allocation.
- 6.2 This would inform any necessary site-specific criteria for site allocation policies.