Oldham Local Plan

Draft Local Plan: Natural Environment Topic Paper



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1. Introduction and Purpose

- 1.1 This is the Natural Environment Topic Paper and is one of ten topic papers produced to inform the consultation on the Oldham Local Plan: Draft Plan. Please note that open space is addressed within the Communities Topic Paper.
- 1.2 All of the papers can be found on the Oldham Council website at Oldham Council website website 1.
- 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 the natural environment (open land and biodiversity) 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.

¹ Available at: <a href="https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_pla

National

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

National Parks

2.2 National Planning Policy Framework (NPPF) paragraph 182 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and the conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight.

Green Belt

- 2.3 NPPF attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 2.4 Green Belt serves five purposes:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.5 Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.
- 2.6 When defining Green Belt boundaries, plans should:
 - a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
 - b) not include land which it is unnecessary to keep permanently open;
 - c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period:
 - d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of

- safeguarded land should only be granted following an update to a plan which proposes the development;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.7 Once Green Belts have been defined, Local Planning Authorities (LPAs) should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
- 2.8 Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 2.9 NPPF regards the construction of new buildings as inappropriate in the Green Belt and sets out the exceptions to this, such as c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; e) limited infilling in villages; and f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites).

Local Green Spaces

- 2.10 NPPF paragraphs 105 to 107 state that the designation of land as Local Green Space (LGS) through local plans allows communities to identify and protect green areas of particular importance to them. Designating land as LGS should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. LGS's should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.
- 2.11 The LGS designation should only be used where the green space is:
 - a) in reasonably close proximity to the community it serves;
 - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - c) local in character and is not an extensive tract of land.
- 2.12 Policies for managing development within a LGS should be consistent with those for Green Belts.

Nature

2.13 Paragraph 180 states that planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and
- preventing new and existing development from contributing to, being put at
 unacceptable risk from, or being adversely affected by, unacceptable levels of
 soil, air, water or noise pollution or land instability. Development should,
 wherever possible, help to improve local environmental conditions such as air
 and water quality, taking into account relevant information such as river basin
 management plans.
- 2.14 Paragraph 181 states that plans should 'distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries'.
- 2.15 Paragraph 185 states that to protect and enhance biodiversity and geodiversity, plans should:
 - a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and steppingstones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation;
 - b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 2.16 Paragraph 186 states when determining planning applications, LPAs should apply the following principles:
 - a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special

- scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

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

2.17 The <u>planning practice guidance</u>² includes detailed advice on Green Belt (July 2019), Local Green Spaces (March 2014) and Natural Environment (July 2019).

Green Belt

- 2.18 Planning Practice Guidance has provided updated advice on factors that can be taken into account when considering the potential impact of development on the openness of the Green Belt. These include, but are not limited to:
 - openness;
 - duration of the development; and
 - and the degree of activity likely to be generated.
- 2.19 It also sets out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements. Improvements may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:
 - new or enhanced Green Infrastructure;
 - woodland planting;
 - landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
 - improvements to biodiversity, habitat connectivity and natural capital;
 - new or enhanced walking and cycle routes; and
 - improved access to new, enhanced or existing recreational and playing field provision.

Local Green Spaces

2.20 Planning Practice Guidance expands upon designating LGS. It explains that LGS designation is a way to provide special protection against development for green areas of particular importance to local communities.

² The Planning Practice Guidance is available at: https://www.gov.uk/government/collections/planning-practice-guidance

- 2.21 Designating LGS will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the LGS designation should not be used in a way that undermines this aim of plan making.
- 2.22 The guidance explains that if land is already protected by a designation (e.g. Conservation Area or a nature designation), then consideration should be given to whether any additional local benefit would be gained by designation as an LGS.
- 2.23 Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

Natural Environment - Green Infrastructure

- 2.24 Planning Guidance explains that Green Infrastructure can embrace a range of species and assets that provide environmental and wider benefits. It can include playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies.
- 2.25 The guidance explains that Green Infrastructure is a natural capital asset that provides multiple benefits, at a range of scales. For communities, these benefits can include enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk. These benefits are also known as ecosystem services.
- 2.26 In terms of planning goals Green Infrastructure can help in:
 - building a strong, competitive economy;
 - achieving well-designed places;
 - promoting healthy and safe communities;
 - mitigating climate change, flooding and coastal change; and
 - conserving and enhancing the natural environment.
- 2.27 It states that a strategic approach should be taken to Green Infrastructure through identifying the location of existing and proposed Green Infrastructure networks and set out appropriate policies for their protection and enhancement. To inform these and their implementation it is suggested that Green Infrastructure frameworks or strategies be prepared at a district-wide scale to help.
- 2.28 In terms of planning decisions, it explains that Green Infrastructure opportunities and requirements need to be considered at the earliest stages of development proposals, as an integral part of development and infrastructure provision, and taking into account existing natural assets and the most suitable locations and types of new provision. Planning conditions or the Community Infrastructure Levy (CIL) may all be potential mechanisms for securing and funding Green Infrastructure.

Biodiversity, geodiversity and ecosystems

- 2.29 The guidance explains that Section 40 of the Natural Environment and Rural Communities Act 2016 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by government in its 25 Year Environment Plan.
- 2.30 Development plans and planning decisions have the potential to affect biodiversity or geodiversity outside as well as inside relevant designated areas.
- 2.31 Planning authorities can work collaboratively with other partners, including Local Nature Partnerships, to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. Equally, they need to consider the opportunities that individual development proposals may provide to conserve and enhance biodiversity and geodiversity.
- 2.32 Local ecological networks can make a significant contribution to developing the Nature Recovery Network. Local ecological networks can be identified and mapped as a part of the plan-making process, with policies identifying appropriate levels of protection and opportunities to create, restore or enhance habitats or improve connectivity.
- 2.33 Locally designated 'Local Wildlife Sites' and 'Local Geological Sites' are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution.
- 2.34 National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.
- 2.35 LPAs can take a lead in establishing and maintaining partnerships and systems to identify, manage, enhance and safeguard local sites.
- 2.36 Planning authorities need to consider the potential impacts of development on protected and priority species, and the scope to avoid or mitigate any impacts when considering site allocations or planning applications.

Biodiversity Net Gain

2.37 The guidance explains that net gain describes an approach to development that leaves the natural environment in a measurably better state than it was beforehand. Net gain is an umbrella term for both biodiversity net gain and wider environmental net gain.

- 2.38 Plans can be used to set out a suitable approach to both biodiversity and wider environmental net gain, how it will be achieved, and which areas present the best opportunities to deliver gains. Such areas could include those identified in: natural capital plans; local biodiversity opportunity or ecological network maps; local Green Infrastructure strategies; strategic flood risk assessments; water cycle studies; air quality management plans; river basin management plans; and strategic protected species licensing areas. Consideration may also be given to local sites including where communities could benefit from improved access to nature.
- 2.39 Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures.
- 2.40 The guidance makes clear that biodiversity net gain complements and works with the biodiversity mitigation hierarchy set out in NPPF paragraph 186a. It does not override the protection for designated sites, protected or priority species and irreplaceable or priority habitats set out in the NPPF. LPAs need to ensure that habitat improvement will be a genuine additional benefit and go further than measures already required to implement a compensation strategy.

Landscape

- 2.41 The NPPF is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes.
- 2.42 Section 11A of the National Parks and Access to the Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000 require that 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks relevant authorities 'shall have regard' to their purposes for which these areas are designated.
- 2.43 This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all LPAs, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Parks, but which might have an impact on their setting or protection.

Draft biodiversity net gain planning practice guidance (Department for Levelling Up, Housing and Communities, November 2023)

2.44 Draft biodiversity net gain planning practice guidance³ was published in November 2023 and sets out guidance on Biodiversity Net Gain (BNG) in relation to planning applications.

³ The guidance is available at: https://www.gov.uk/guidance/draft-biodiversity-net-gain-planning-practice-guidance

The 25 Year Environment Plan (HM Government, updated February 2023)

- 2.45 Also of relevance to this topic area is the government's <u>25 year Environment Plan</u>⁴ (A Green Future: Our 25 Year Plan to Improve the Environment), which is focussed around ten goals:
 - 1. Thriving plants and wildlife
 - 2. Clean air
 - 3. Clean and plentiful water
 - 4. Managing exposure to chemicals and pesticides
 - 5. Maximise our resources, minimize our waste
 - 6. Using resources from nature sustainably
 - 7. Mitigating and adapting to climate change
 - 8. Reduced risk of harm from environmental hazards
 - 9. Enhancing biosecurity
 - 10. Enhanced beauty, heritage, engagement with the natural environment

Regional

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

2.46 The <u>Places for Everyone</u>⁵ (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.

2.47 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 Cowlishaw, JPA17 Land south of Coal Pit Lane' and JPA18 South of Rosary Road;
- Supports the delivery of key infrastructure, such as transport and utilities; and
- Defines a new Green Belt boundary for the borough.
- 2.48 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

⁴ The plan is available at: https://www.gov.uk/government/publications/25-year-environment-plan

⁵ PfE is available at: https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/

- at a more detailed local level to reflect our priorities and support delivery of the council's regeneration ambitions and Creating a Better Place.
- 2.49 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.
- 2.50 The most relevant PfE policies relating to the natural environment are outlined below. However, please see the PfE plan for full policy wording.
- 2.51 **Policy JP-G1: Landscape Character** states development within a Landscape Character Type, as shown on Figure 8.1, should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location, including having regard to:
 - 1. Topography, geology and drainage;
 - 2. Land use and field patterns;
 - 3. Semi-natural habitats and woodland cover;
 - 4. Archaeology and cultural heritage;
 - 5. Settlement, road pattern and rights of way; and
 - 6. Views and perceptual qualities.
- 2.52 The interface of new development with the surrounding countryside/landscape is of particular importance. These transitional areas require well-considered and sensitive treatment. In particular, opportunities to improve the intactness and condition of the landscape should be taken, especially in conjunction with seeking a net enhancement of biodiversity/geodiversity resources under Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'.
- 2.53 In implementing this strategic policy, regard will be had to the Greater Manchester Landscape Character and Sensitivity Assessment (GMLCSA), in particular its guidance on future development and landscape management/enhancement within areas covered by each landscape character type.
- 2.54 **Policy JP-G2 Green Infrastructure Network** states a strategic approach will be taken to the protection, management and enhancement of our Green Infrastructure in order to protect and enhance the ecosystem services which the Green Infrastructure Network provides, including flood management, climate change mitigation and adaptation. Alongside this primary function an enhanced Green Infrastructure network will support wider public health benefits, including promotion of active travel, food growing and recreational opportunities.
- 2.55 The protection, management and enhancement of Green Infrastructure will contribute to the development of a Local Nature Recovery Strategy for Greater Manchester. This Strategy will feed into the development of a Nature Recovery Network locally and nationally.

- 2.56 Development within and around the Green Infrastructure Network should be consistent with delivering major green infrastructure improvements within them and should contribute to improvements.
- 2.57 Wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network. Where new or improved green infrastructure is delivered as part of a development, the developer should make appropriate provision for its long-term management and maintenance.
- 2.58 Policy JP- G3: River Valleys and Waterways river valleys and waterways will be protected and improved as central components of our Green Infrastructure Network and a vital part of a Nature Recovery Network, making a major contribution to local identity, quality of life and the natural environment. The policy sets out nine priorities to be considered in decision making.
- 2.59 **Policy JP-G5: Uplands** highlights the importance of the uplands for nature and highlights that we will seek to:
 - 1. Integrate any new development into the landscape;
 - 2. Enhance the full range of upland habitats;
 - 3. Significantly extend the area of active blanket bog;
 - 4. Protect and naturally regenerate clough woodland;
 - 5. Increase the role of the area in water storage, flood risk management (through Natural Flood Management) and water quality improvements, as part of a catchment-based approach;
 - 6. Enable more people to enjoy the distinctive character of the uplands in sustainable ways; and
 - 7. Ensure that new development does not have an adverse impact on protected habitats of the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA from urban edge effects, loss of and/or disturbance to functionally linked habitats and recreation disturbances. This will be implemented by:
 - Within 400m of the SAC and SPAs boundaries, no development will be permitted, unless, as an exception, the development and/or its use would not have an adverse effect on the integrity of the SAC or SPAs;
 - b. Within 2.5km of the SAC and SPAs boundaries, applications for new development should be accompanied by an assessment to determine if the development site provides foraging habitats for the qualifying bird species of the SPAs. If foraging habitats are found on site, appropriate avoidance and/or mitigation measures will be required; and
 - c. Within 7km of the SAC and SPAs boundaries, new residential development will be required to mitigate recreation disturbance impacts on the SAC and SPAs through:
 - i. the provision of on-site suitable alternative natural greenspace or financially contribute to off-site provision of such greenspace; and

- ii. A financial contribution to the implementation of a Strategic Access, Monitoring and Management Strategy for the SAC and SPAs.
- 2.60 **Policy JP-G6: Urban Green Space** states to ensure there is an appropriate scale, type, quality and distribution of accessible urban green space that can support a high quality of life and other important green infrastructure functions:
 - existing urban green space will be protected and enhanced in balance with other considerations; and
 - we will work with developers and other stakeholders to deliver new high quality urban green spaces
- 2.61 Development should be designed to support the positive use of nearby green spaces, such as by offering a high-quality setting, providing natural surveillance, and facilitating easy access by walking and cycling.
- 2.62 **Policy JP-G7: Trees and Woodland** confirms we will work to deliver the aims and objectives of the Greater Manchester Tree and Woodland Strategy, aiming to significantly increase tree cover, protect and enhance woodland, and connect people to the trees and woodland around them. The policy sets out thirteen ways in which local planning and activities will deliver this.
- 2.63 **Policy JP-G9: A Net Enhancement of Biodiversity and Geodiversity** seeks to achieve a net enhancement of biodiversity resources through a number of different ways. Development will be expected to:
 - a) Follow the mitigation hierarchy of:
 - Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts, then
 - ii. Adequately mitigating any harm to biodiversity, then
 - iii. Adequately compensating for any remaining harm to biodiversity
 - b) Avoid fragmenting or severing connectivity between habitats;
 - c) Achieve a measurable net gain in biodiversity of no less than 10%;
 - d) Make appropriate provision for long-term management of habitats and geological features connected to the development;
 - e) Where appropriate, development should: mitigate air pollution impacts on Manchester Mosses SAC; mitigate urban edge, functionally linked land and recreation disturbance impacts on the South Pennine Moors SAC/SPAs; and assess and potentially mitigate boat movement, water pollution, and light spillage and shading impacts on the Rochdale Canal SAC; and
 - f) Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s) in the PfE evidence base and/or any updated or appropriate biodiversity/ecological assessments submitted as part of the planning application process.

2.64 Policy JP-G10: The Green Belt identifies that the Green Belt is defined on the Policies Map and sets out that the Green Belt serves five purposes as set out in national policy. The policy adds that beneficial use of the Green Belt will be enhanced where this this can be achieved without harm to its openness, permanence or ability to serve its five purposes. In particular, the enhancement of its green infrastructure functions will be encouraged, such as improved public access and habitat restoration, helping to deliver environmental and social benefits for our residents and providing the high-quality green spaces that will support economic growth.

Greater Manchester 5-Year Environment Plan (GMCA, 2019)

- 2.65 The <u>Greater Manchester 5-Year Environment Plan</u>⁶ is a key part of the Greater Manchester Strategy and focuses on addressing the major environmental challenges that threaten the future health and prosperity of the city-region, including mitigating climate change, air quality, production and consumption of resources, natural environment, and resilience and adaptation to the impacts of climate change.
- 2.66 It states that in tackling environmental challenges, we must harness the potential for delivering economic, social and environmental benefits together for the city-region, including the need to create vibrant and sustainable places; the need to increase productivity and the need to improve the health and quality of life of residents.
- 2.67 The plan sets out the following priorities for the next 5 years in relation to the natural environment:
 - 1. Managing our land sustainably, including planting 1 million trees by 2024;
 - 2. Managing our water and its environment sustainably;
 - 3. Achieving a net gain in biodiversity for new development;
 - 4. Increasing investment into our natural environment; and
 - 5. Increasing engagement with our natural environment.

Local

The Oldham Plan (Oldham Partnership, 2023)

- 2.68 The Oldham Plan 'Our Future Oldham A shared vision for 2030'⁷, 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.
- 2.69 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.

⁶ The Greater Manchester Environment Plan is available at: https://www.greatermanchester-ca.gov.uk/what-we-do/environment/five-year-environment-plan/

⁷ The Oldham Plan is available at: https://www.oldham.gov.uk/downloads/file/7589/the oldham plan - our future oldham

- 2.70 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 (Oldham Council, 2022)

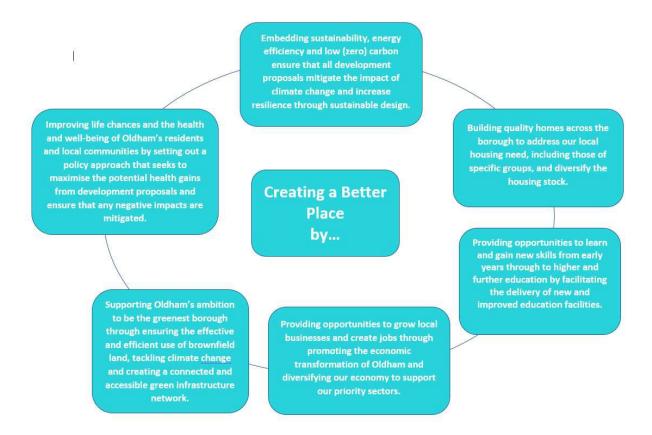
- 2.71 The Oldham Council <u>Corporate Plan 2022-27</u>8 sets out the council's priorities, with specific actions for 2022-25. It works in parallel with The Oldham Plan and sets out what it's priorities mean for Oldham:
 - Healthy, safe and well supported residents
 - A great start and skills for life
 - Better jobs and dynamic businesses
 - · Quality homes for everyone
 - A clean and green future
- 2.72 Delivering against these priorities means that the council can help residents and make Oldham the best place it can be.
- 2.73 The Corporate Plan specifically references the Green New Deal targets to make the council carbon-neutral by 2025 and the borough carbon-neutral by 2030. This is important for the borough as a way of making Oldham a more pleasant and healthier place to live in the short term, while protecting the borough and planet from the worst effects of climate change in the long term.

Creating a Better Place

2.74 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.

⁸ The Corporate Plan is available at: https://www.oldham.gov.uk/downloads/file/7405/oldham_corporate_plan_2022-27

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



- 2.75 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.
- 2.76 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.
- 2.77 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.
- 2.78 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 natural environment will:

- Use the benefits from Green Infrastructure creation, enhancement and protection to underpin our response to climate change and carbon reduction whilst providing connected and resilient networks.
- Ensure that our approach to tackling the climate change emergency has many benefits and outcomes that link to our health and wellbeing priorities in that it will help to ensure Oldham residents have increased access to an enhanced Green Infrastructure network; and promote active travel choices, including walking and cycling.

Oldham Green New Deal (Oldham Council, 2020)

- 2.79 In July 2019 the council announced a climate emergency and committed to becoming carbon neutral as an organisation by 2025, and to becoming the UK's first "Green New Deal Council", setting a target of 2030 for carbon neutrality for the borough as a whole. In recognising the huge opportunity in tackling the climate emergency the <u>Green New Deal Strategy</u> sets in place a framework to achieve the above targets whilst working with residents and partners to make Oldham an even greener, smarter, more enterprising place.
- 2.80 The vision is to "Make Oldham a greener, smarter, more enterprising place".
- 2.81 The objectives include:
 - Make Oldham a leading local authority area for environmental quality and play a leading role in meeting the Greater Manchester Mayor's Green City Region Objectives.
 - Maintain a high-quality local environment which delivers health and well-being for residents, including food and recreation, reducing costs for public services.
 - Generate inbound tourism for the borough by building on Oldham's reputation for being a green, attractive, and forward-thinking sustainable borough.
 - Future-proof the regeneration of the borough by establishing Oldham as an exemplar Green City on energy, carbon, water and green infrastructure.
- 2.82 The strategic aim is to meet our environmental targets whilst maximising the benefit of this action to develop Oldham's green economy. The three pillars of the strategy are:
 - 1. Green Economy, including work, skills and business engagement;
 - 2. Low Carbon (physical infrastructure); and
 - 3. Northern Roots (the 160-acre eco-park at Snipe Clough and its attendant brand and initiatives, and the state of the art zero-carbon Eco-Centre at Alexandra Park).

⁹ Details of the Green New Deal can be found at: https://www.oldham.gov.uk/info/201249/green_new_deal

Oldham's Green Infrastructure Strategy (Oldham Council, 2022)

- 2.83 The Oldham Green Infrastructure Strategy ¹⁰ (and open space audit) was completed in 2022.
- 2.84 Our Vision for Oldham's Green Infrastructure (GI) is that by 2037 the borough will be a carbon neutral exemplar with a GI network which brings multiple benefits to people, wildlife and neighbourhoods.
- 2.85 The Strategy has identified seven priority themes to do this which are introduced below. Figure 1 presents place based opportunities which are linked to the seven priority themes:
 - 1. Thriving Wildlife Our scattered core biodiversity areas can be joined up by increasing tree canopy cover, establishing meadows and wetlands or managing open spaces with biodiversity as an objective. Key corridors and 'stepping stones' could be enhanced along our main river valleys; the Medlock, the Beal and the Tame. New developments will help fund biodiversity net gain and in the countryside areas, habitats can be created and enhanced by landowners.
 - 2. Carbon Neutral Oldham Oldham Council aims to be carbon neutral by 2025; and it is hoped the borough will be carbon neutral by 2030. GI will contribute to these targets. Wetlands, woodlands and semi-natural grasslands are effective at storing and sequestering carbon. We recommend the protection of peat habitats in the uplands and encouraging sustainable agricultural land uses elsewhere. The Bee Network map highlights active travel routes which reduce the need for local car journeys.
 - 3. **Healthy and Active Communities** The borough has many types of open space including allotments, amenity space, parks and gardens and play space. Over 50% are already 'good' quality or better. The Green Infrastructure Strategy and Oldham's Open Space Assessment set a target that all open spaces are brought up to at least 'good' quality.
 - 4. Green Access for All Many houses in Oldham's central wards have no private garden. Nearly a third of Oldham's population are classed by the NHS as "inactive" i.e. doing less than 30 minutes of activity per week. The Green Infrastructure Strategy highlights potential active travel routes to the borough's open spaces and recommends a 'whole system approach' to increase participation in physical activity.
 - 5. **Distinctive Landscapes** Oldham has a unique landscape being at the edge of the Pennine range. The valley systems, variation in landform and many long-range views contribute to our quality of life and attract visitors. GMCA has an ambition to plant one million trees by 2024, of which 100,000 trees could be planted in Oldham. Our Green Infrastructure Strategy also recommends that most of the borough's wards should have at least 20% tree canopy cover (except on precious peat habitats).
 - 6. **Slowing the Flow and Water Quality** Four of Greater Manchester's rivers find their source in Oldham: the Beal, Tame, Medlock and Irk. They are all prone to

¹⁰ Details of the strategy can be found at: https://www.oldham.gov.uk/downloads/download/2183/oldham_green_infrastructure_strategy

- flooding, particularly downstream in neighbouring local authorities. SuDS and natural flood management can mitigate some of flood risks.
- 7. Sustainable Growth and Green Jobs "Green New Deal" is Oldham's strategy for carbon neutrality and development of the green technology sector (GTS). Oldham's Green Infrastructure can help deliver green jobs through inbound tourism, keeping the borough's reputation for being at the forefront of cutting-edge environmental technologies, and ensuring workers and residents are 'carbon literate' and actively engaged in delivering environmental change.

SEY
Open Spaces
Water
Metholick Route
Metholick Route
Metholick Stop
All Metholic Stop
All

Figure 2: Key Diagram showing place-based opportunities for Green Infrastructure

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:
 - 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 natural environment were:
 - Oppose the release of Green Belt for development needs. Some respondents
 wished to see non-strategic sites and safeguarded land allocated for
 development. The site allocations topic paper will cover the methodology for site
 selection.
 - Green Belt policies should remain strong.
 - Oppose loss / development on Other Protected Open Land (OPOL).
 - OPOL sites need to be reviewed and fully / partly released for development.
 - The need to maintain and enhance green infrastructure, including nature designations and provide safe open space, including recreation facilities, to deliver a wide range of benefits.
 - Impacts from development on biodiversity need to be considered.
 - Landscape character must be protected, conserved and enhanced.

Regulation 18 Issues and Options Consultation

- 3.5 The Oldham Local Plan: Issues and Options consultation in 2021 identified the natural environment and open land 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:

Green Belt Questions

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

Local Green Space Questions

- 1. Do you agree that the sites that have met the Local Green Space criteria should be designated as Local Green Space?
- 2. Are any of the proposed LGS designations particularly special to you? If so, which one(s) and why?
- 3. OPOL 18 and 20 have not met the LGS criteria. Should they either be allocated for development, safeguarded for future development needs or left unallocated?
- 4. Are there any other sites that are not already designated (e.g. Green Belt) that you think could meet the Local Green Space criteria and should be protected from inappropriate development?

- 5. If inappropriate development does take place on future Local Green Spaces, which would be treated in line with Green Belt policy, do you think the council should seek compensatory enhancement measures to either the remaining Local Green Space or others?
- 6. Are there other enhancement opportunities for future Local Green Spaces that should be identified?

Green Infrastructure Questions

- 1. To ensure green infrastructure is embedded across the borough and within our built environment, which of the following options would you prefer?
 - a. the use of a green infrastructure checklist?; or
 - b. the use of BREEAM as described above; or
 - c. the use of Building with Nature accreditation scheme; or
 - d. an alternative? Please provide details. Please provide a justification for your preferred choice.
- 2. Do you think the Local Plan should set out a specific distance for buffers between new development and sensitive areas (such as nature designations and ancient woodland) and if so what should this be?

Biodiversity Questions

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

Protection of Trees Question

- 1. Do you think Oldham should continue to have a policy regarding the protection of trees?
- 3.8 We have reviewed the responses you gave us, and you will find the issues raised in relation to the natural environment summarised in this topic paper below.

4. The Natural 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.

Policy OL1 Consideration for the Peak District National Park

Feedback from Issues and Options consultation

- 4.2 The consultation responses are summarised in the 'Issues and Options Comments and Response Schedule'. In relation to the above policy area no specific questions regarding the Peak District National Park (PDNP) had been asked.
- 4.3 However, a response was received from the PDNP Authority (PDNPA) requesting to see greater referencing to the national park. In particular, understanding that the national park doesn't just stop at the LPA boundary but flows into Oldham Borough and acknowledging that decisions made by Oldham may have an impact on the national park, and in such circumstances greater weight is given to the purpose of conserving and enhancing the national park. The national park's valued characteristics are used in planning to link with the landscape strategy which describes the landscape character. It is important to reference these in the Local Plan so that there is clear consistency in approach to delivering/having regard to national park purposes and duty.

Issues to be addressed

4.4 Issues to be addressed on open land were summarised in the Open Land topic paper at Issues and Options stage. However, these did focus more on Green Belt and Local Green Spaces rather than issues within the PDNP.

Evidence Base

- 4.5 The policy is set within the context of Section 62 of the Environment Act (1995) to have regard to national park purposes and if it appears that there is a conflict between those purposes, greater weight shall be attached to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.
- 4.6 The purposes of National Park designations are to:
 - conserve and enhance their natural beauty, wildlife and cultural heritage; and
 - promote public understanding and enjoyment of their special qualities.
- 4.7 Development proposals should, where relevant, also take into consideration the valued characteristics of the National Park, as referenced at paragraph 9.15 of the adopted core strategy (Peak District National Park Core Strategy Development Plan Document, 2011), which link planning with the Peak Districts' Landscape Strategy.
- 4.8 The valued characteristics include:
 - natural beauty, natural heritage, landscape character and diversity of landscapes;

- sense of wildness and remoteness;
- clean earth, air and water;
- importance of wildlife and the area's unique biodiversity;
- thousands of years of human influence which can be traced through the landscape;
- distinctive character of hamlets, villages and towns;
- trees, woodlands, hedgerows, stone walls, field barns and other landscape features:
- significant geological features;
- wealth of historic buildings, and registered parks and gardens;
- opportunities to experience tranquillity and quiet enjoyment;
- opportunities to experience dark skies;
- opportunities for outdoor recreation and adventure;
- opportunities to improve physical and emotional well being;
- easy accessibility for visitors from surrounding urban areas;
- vibrancy and sense of community;
- cultural heritage of history, archaeology, customs, traditions, legends, arts and literary associations;
- environmentally friendly methods of farming and working the land
- · craft and cottage industries;
- special value attached to the national park by surrounding urban communities;
- the flow of landscape character across and beyond the National Park boundary, providing a continuity of landscape and valued setting for the National Park;
- any other feature or attribute which make up its special quality and sense of place.

Proposed Policy Approach and Reasons

- 4.9 The policy states development within the planning boundary of Oldham Borough must ensure it does not conflict with the purposes of the Peak District National Park taking into account views into and out of the park and sensitive design into the wider landscape.
- 4.10 Development that is viewed as conflicting with the purposes of the national park will not be permitted.
- 4.11 In line with Section 62 of the Environment Act (1995) the policy sets out that the council will have regard to the purposes of the national park, which is consistent with national planning policy paragraph 182 that states great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and the conservation and enhancement of wildlife and cultural heritage. In preparing the policy the council has worked positively with the PDNPA.

Integrated Assessment

4.12 Policy OL1 scored positively or neutral. One negative was given against IA1 as the policy could constrain renewable energy however mitigation is not required as the

area affected by this policy is unlikely to be acceptable for wind turbines and other plan policies address energy. 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 OL2 Protecting and enhancing Oldham's Green Belt and Policy OL3 Extensions and alterations to existing buildings within the Green Belt

Feedback from Issues and Options consultation

- 4.13 The main feedback at Issues and Options stage with regards to the above policies was:
 - The Green Belt should be preserved
 - A review of the Green Belt should be undertaken and where appropriate some land can be released from the Green Belt and other land included without having a significant effect in the NPPF.
 - Comments against development / inappropriate development on Green Belt
 - Environmental assets and rural landscapes should be promoted, protected and enhanced through the Local Plan policies
 - In terms of Green Belt enhancements, the focus should be in combating climate change and enhancing biodiversity. Other respondents supported access improvements. More detailed comments were given on enhancements.
 - A tidying up and release of smaller sites is encouraged.

Issues to be addressed

- 4.14 Issues to be addressed on open land were summarised in the open land topic paper at Issues and Options stage. Relevant to the above policies these included:
 - setting any further detailed Green Belt policy at the local level, if there is a need for it above NPPF; and
 - the need to plan for the positive use and enhancement of the Green Belt, including any compensatory improvements to the environmental quality or accessibility of the remaining Green Belt land.

Evidence Base

4.15 National planning policy and its practice guidance sets out that new development is inappropriate unless it meets once of the exceptions.

4.16 In terms of Green Belt enhancements, the <u>Identification of opportunities to enhance</u> the beneficial use of the Green Belt¹¹ (GMCA, 2020) was prepared to support PfE.

¹¹ This study can be found at: <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/previous-stages/places-for-everyone-2021-regulation-19/supporting-documents-2021/?folder=\07%20Greener%20Places#fList

- 4.17 An assessment has been carried out focusing on the identification of potential opportunities to enhance the beneficial use of retained and proposed Green Belt in the vicinity of the Greater Manchester.
- 4.18 For parts of Oldham the assessment suggests beneficial use proposals and potential Green Infrastructure enhancements in relation to access, sport and recreation, biodiversity and wildlife corridors and landscape and visual, which can be considered where developments may be looking at Green Belt enhancements.
- 4.19 In terms of Policy OL3 the council has also reviewed a number of previous planning applications that have determined for extensions and alterations to existing buildings in the Green Belt and reviewed policies elsewhere across England.
- 4.20 In addition to the above two policies the introductory text to the Green Belt policies explains that PfE proposes the revised Green Belt boundary for each of the nine Greater Manchester authorities included within the plan, including Oldham, and these will be incorporated into the Local Plan, following the adoption of PfE. The Local Plan does not address strategic Green Belt boundary revisions. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken.
- 4.21 The council makes it clear that we are not proposing to allocate greenfield sites in the Green Belt for development within this plan.
- 4.22 Appendix 8 of the Draft Local Plan sets out proposed boundary revisions to the Green Belt. The revised Green Belt boundary will also be shown on the Policies Map at Publication Stage.
- 4.23 Green Belt boundary changes have typically been proposed where:
 - the base map has changed over time through improved mapping tools and the Green Belt layer needs to reflect the base map;
 - the Green Belt boundary did not appear to have a clear boundary, marked by physical features that are recognisable and likely to be permanent and therefore a change has been proposed to improve this; and
 - the Green Belt may have overlapped slightly with a residential curtilage and it is
 the council's view that this was not the intention when the Green Belt was drawn
 up so the dwelling / and or curtilage has been proposed to either be all included
 within the Green Belt or all be removed.
- 4.24 Appendix 1 of this topic paper lists the maps where Green Belt boundary amendments are proposed and the reason(s) why.

Proposed Policy Approach and Reasons

Policy OL2 Protecting and Enhancing Oldham's Green Belt

- 4.25 The council has through Policy OL1 expanded on some aspects of national Green Belt policy to provide further clarity on the following types of development:
 - agricultural buildings;

- provision of appropriate facilities for uses including outdoor sports and recreation, including stables; and
- limited infilling.
- 4.26 The council has expanded on these types of development further to ensure that developments such as facilities for recreation, for example stables, and buildings for agriculture are appropriate for their intended use through considering the design, layout and form of construction. This is to prevent permission being given for the above intended uses later being subject to a planning application for the re-use of buildings for an alternative use such as residential use.
- 4.27 New residential development in the Green Belt is not usually permitted unless it falls under one of the exceptions such as limited infilling or limited affordable housing. So, this policy seeks to control better the types of development that are being permitted in the Green Belt.
- 4.28 The policy also makes reference to enhancement of positive use of the Green Belt which will be in line with PfE Policy JP-G10.
- 4.29 The criteria that will be considered when determining proposals that fall within the Green Belt exceptions has been developed from officer knowledge and experience, ensuring that the plan provides effective control with regards to development is appropriate within the Green Belt. This is in line with national policy section 13 and provides clarity on particular types of development and how these might be addressed when determining an application to ensure sustainable development is achieved.

Policy OL3 Extensions and alterations to existing buildings within the Green Belt

- 4.30 Policy OL3 specifically expands on NPPF paragraph 154 c) which allows the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.
- 4.31 This policy provides clarity on how the council may determine whether an extension of alternation is proportionate or is disproportionate over and above the size of the original dwellings.
- 4.32 In preparing this policy, plan policies prepared elsewhere across England were examined and the council also reviewed some planning applications that have determined for extensions and alterations to existing buildings in the Green Belt.
- 4.33 Generally, the council has informally used up to one third of the original building as a guide for what constitutes an acceptable extension / addition, and this may well be appropriate to most extensions / additions requiring permission. However, there have been proposals where permission has been granted within the borough which exceed one third and these have been found to be acceptable. Therefore, some flexibility has been built into the policy and anything that exceeds 30% would need to be justified to demonstrate that the proposal is proportionate or that very special circumstances apply.

4.34 The policy sets out why a volume of 30% has been stated and seeks control over ensuring that development is appropriate within the Green Belt. This is consistent with national policy section 13 and provides clarity over the definition of disproportionate extensions and additions.

Integrated Assessment

- 4.35 Policy OL2 scored mostly positively or neutral. There were two uncertainties / a potentially negative impact score as the policy could constrain some types of low carbon energy due to the fact that national policy states such developments (i.e. wind energy) may be inappropriate in the Green Belt. However, mitigation is not required as this is national Green Belt policy and areas of search could be identified to address this. In addition, there was a uncertainty against IA 16 in relation to transport as the policy has the potential to lead to access enhancements but this would very much depend on future applications and projects as they are developed. 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.
- 4.36 Policy OL3 scored positively or neutral. No mitigation or enhancements to the policy were required as a result of the IA process, although for clarity and presentation 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. The policy was not screened in by the HRA.

Policy OL4 - Local Green Spaces

Feedback from Issues and Options consultation

- 4.37 The Issues and Options consultation presented the outcome of the Local Green Space Assessment which assessed whether sites (currently designated as Other Protected Open Land OPOL and one new site) met Local Green Space criteria set out in NPPF. Responses included:
 - mixed responses to the question of whether sites that have met Local Green Space criteria should be designated as such.
 - Some felt that sites not meeting the criteria should not be de-designated as Other Protected Open Land (OPOL).
 - Suggestion that the Accessible Natural Greenspace Standard (ANGSt) could be a useful tool.
 - There is the need to maintain ecological connectivity.
 - A need for strict policy in relation to development on LGS.

Issues to be addressed

4.38 The Local Plan explains that most proposed LGSs are currently designated Other Protected Open Land (OPOLs) in the adopted Joint DPD. OPOL is open land which is considered to be locally important because it helps preserve the distinctiveness of an area. As well as providing attractive settings, they provide other benefits, such as informal recreation and habitats for biodiversity, therefore helping to provide

sustainable communities and help mitigate climate change. A review of OPOL has been undertaken against LGS criteria to ensure the policy approach is robust and up to date.

- 4.39 This issue was identified in the Open Land Topic Paper at Issues and Options stage.
- 4.40 The Scoping Report has since been updated (Update 2) and identifies the issues to be addressed include the need to:
 - protect and enhance biodiversity, geodiversity and ecological networks and a multi-functional green infrastructure network;
 - ensure land and buildings are used in an effective and efficient manner, maximising the use of brownfield land;
 - protect, conserve and enhance the historic environment, including their wider settings and to preserve and conserve archaeological heritage;
 - improve health and well-being and reduce health inequalities across the borough;
 and
 - promote quality and accessible open spaces.
- 4.41 These issues all link to the purposes and roles that LGS's can offer.

Evidence Base

- 4.42 The council published a <u>Local Green Space Assessment</u>¹² in July 2021 as part of the Issues and Options Local Plan consultation.
- 4.43 There are 22 designated Other Protected Open Land (OPOL) sites allocated in the current Local Plan (the Joint Core Strategy and Development Management Policies Development Plan Document).
- 4.44 There is no reference to OPOL in NPPF, however it does set out an approach for LGS designation. LGS is a way to provide special protection against development for green areas of particular importance to local communities. A LGS can only be designated through a Local Plan or Neighbourhood Plan. To align with NPPF it is proposed that OPOL be redesignated as LGS where it meets the NPPF and its supporting guidance.
- 4.45 NPPF states the LGS designation will not be appropriate for most green areas or open space. The designation should only be used:
 - Where the green space is in reasonably close proximity to the community it serves:
 - Where the green space is demonstrably special to a local community and holds a
 particular local significance, for example because of its beauty, historic
 significance, recreational value (including as a playing field), tranquillity or
 richness of its wildlife; and
 - Where the green space concerned is local in character and is not an extensive tract of land.

¹² The assessment can be found at: https://www.oldham.gov.uk/downloads/file/7043/local_green_space_assessment

- 4.46 The council has therefore re-assessed OPOL against the LGS criteria in NPPF to ensure that any OPOL sites carried forward as LGS can be justified by up to date robust evidence.
- 4.47 The outcome of the assessment is in the LGS assessment, together with any boundary amendments and reasons why. The proposed LGS's are also reflected in Appendix 9 of the Local Plan Appendices. This also includes opportunities to enhance the future LGS.
- 4.48 A heritage significance assessment has inputted into the LGS Assessment. For some sites this has identified where the historic environment, often linking to recreation, could be enhanced. Consideration will need to be given as to how these opportunities can be delivered through the Local Plan review and / or working with our partners and across council departments.
- 4.49 The assessment recommends the de-designation of some OPOL, which will be through the emerging Local Plan review or through Places for Everyone Joint Development Plan Document (PfE). Until such a time as the revised Local Plan or PfE is in place they will continue to be designated as OPOL and protected through Policy 22 of the Joint DPD.
- 4.50 Any extensions or reductions in boundaries proposed as part of the LGS assessment will need to be considered as part of the Local Plan review. At the point of adoption extensions to the existing OPOL boundaries will be designated as part of the LGS in the Local Plan as LGS and any removals of land from OPOL boundaries will be dedesignated.

Proposed Policy Approach and Reasons

- 4.51 Informed by the findings of the Local Green Space Assessment the policy identifies the proposed LGSs and states these will be shown on the policies map.
- 4.52 The policy states development proposals will generally be deemed inappropriate. Exceptions to this includes certain types of development, provided they do not substantially harm other qualities related to the Local Green Space. The policy then lists the types of development that in principle are acceptable within LGS. This is consistent with the types of development that are permitted within the Green Belt in line with national policy paragraph 107.
- 4.53 Inappropriate development will only be approved in very special circumstances again consistent with national planning policy on Green Belt, which LGS must be consistent with.
- 4.54 The policy makes clear that when assessing development proposals, the council will consider the impact of development on the designated Local Green Space as a whole and its qualities which make it significant. There will be a presumption against development proposals that will substantially harm the significance of the LGS.
- 4.55 The justification explains what substantial harm might include such as the loss of recreation facilities or the ability of people to use that recreation facility in the same way; the loss, reduction or severance of wildlife; and the reduction in the ability of the LGS to provide a tranquil space for example because the site will become more urbanised.

- 4.56 This approach has been informed by the council's experience of applications for inappropriate development being submitted making a case for developing 'only a small part' of the OPOL as a whole. However, the council's view is that the impacts on the whole OPOL / proposed LGS need to be assessed as the cumulative impact of piecemeal development can reduce the overall ability of the LGS to perform its important functions.
- 4.56 The policy seeks to meet Oldham's wider needs in terms of designating spaces which are locally important.

Integrated Assessment

4.57 Policy OL4 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 OL5 Protecting dark skies and tranquillity

Feedback from Issues and Options consultation

- 4.58 The council did not ask questions in relation to this policy area therefore feedback was limited.
- 4.59 However, the policy has developed as a result of a positive working relationship with Natural England between Issues and Options stage and Draft Plan stage where further feedback on evidence sources and the draft policies was given. During this time Natural England advised that the Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraphs 106 and 191 of the NPPF.
- 4.60 Tranquillity is an important landscape attribute in certain areas e.g. within National Parks, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity and are a helpful source of evidence for the Local Plan.

Issues to be addressed

- 4.61 The natural environment topic paper published at Issues and Options stage noted the need to protect and enhance nature designations, biodiversity and ecological networks, which dark skies are important for.
- 4.62 The Scoping Report has since been updated (Update 2) and also identifies this issue as well as the need to protect and improve local environmental quality.

Evidence Base

4.63 As mentioned above, CPRE have produced light pollution and dark skies maps.

These are available on the Open Data Infrastructure Map on Mapping GM. 13 The

¹³ This map can be found at https://mappinggm.org.uk/gmodin/

council has now obtained the GIS (Geographical Information Systems) and will embed it into our systems to apply the evidence into the development plan.

Proposed Policy Approach and Reasons

- 4.64 The policy explains that development must protect Oldham's dark skies with:
 - no permeant illumination within Dark Sky Category 1;
 - strict control over external lighting within Dark Skies Category 2;
- 4.65 Within the remaining part of the borough where skies are typically not dark due to the presence of lighting, development proposals will be expected to minimise and where opportunities arise reduce light spillage and glare. Development proposals must demonstrate that:
 - a) The proposed lighting is the minimum required for security or working purposes;
 - b) Light spillage and glare are minimised, particularly in areas of open countryside or on the edge of settlements; and
 - c) There is no adverse impact on residential amenity, highway safety or to sites of nature conservation value.

Integrated Assessment

4.66 Policy OL5 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.

Policy N1 Protecting Nature, Policy N2 Restoring Nature and Policy N3 Enhancing Green Infrastructure through development

Feedback from Issues and Options consultation

- 4.67 Comments received at Issues and Options included:
 - Support for protecting and enhancing biodiversity across the borough including within the urban area;
 - Pleased to see reference to ancient woodland;
 - Support for biodiversity net gain (BNG) being delivered as close to the site as possible, where practicable, particularly in the Green Belt;
 - The Local Plan needs to be consistent with PfE policies on BNG;
 - Woodland management is supported;
 - Need to make clear the role that Green Infrastructure can provide in providing active travel routes including through connecting up the built environment to employment and local facilities and services;
 - Different preferences for how Green Infrastructure should be measured in schemes such as checklists, BREEAM, building with nature accreditation scheme whilst others requested that any policy on GI Policies should be flexible to allow development to be assessed on a site-by-site basis to ensure the requirements are not too onerous and prevent development coming forward.

- A buffer should be applied to the national park, and it be made clear the PDNP is a nature designation
- Buffers between development and sensitive areas should be specified by ecology and landscape specialists and determined on a site-by-site basis.

Issues to be addressed

- 4.68 The Natural Environment Topic Paper at Issues and Options stage identified the need to:
 - protect and enhance nature designations, biodiversity, ecological networks and geodiversity.
 - reflect priorities and opportunities in the Nature Recovery Plan (LNRS).
 - move away from a net loss of biodiversity to achieving net gains for nature and contribute to conserving and enhancing the natural environment and reducing pollution.
 - prepare a Green Infrastructure Strategy which uses Green Infrastructure as an intervention to tackle wider issues such as mitigating flood risk.
 - embed Green Infrastructure in new development.
 - restore and enhance river and canal corridors, particularly within the Irwell
 Catchment, to improve water quality and enhance biodiversity, re-naturalise rivers
 and waterways, improve public access to waterways and opportunities for
 sustainable travel along waterways.
 - protect ancient woodland, increase tree cover through new tree planting, promote positive Woodland Management and management of recreational pressures.
 - increase the area of peat spoils, including blanket bog in the uplands to sequester carbon, store water, achieve biodiversity net gain and improve public access and enjoyment of the countryside.
- 4.69 The Scoping Report has since been updated (Update 2) and identifies the issues to be addressed include the need to:
 - protect and enhance biodiversity, geodiversity and ecological networks and a multi-functional green infrastructure network
 - · adapt and be resilient to climate change
- 4.70 The Scoping Report also identified issues in relation to health, water, air etc which link to these policies.

Evidence Base

4.71 Maps showing nature designations are available on a range of sources including Mapping GM¹⁴.

¹⁴ Mapping GM can be found at: https://mappinggm.org.uk/gmodin/

- 4.72 Greater Manchester Ecology Unit periodically reviews Sites of Biological Interest (SBIs), including their boundaries and any possible new SBIs for the council to consider.
- 4.73 BNG will be a statutory requirement for some developments from January 2024 therefore the policy approach is expanding on this rather than introducing a new requirement. The council is however working with Greater Manchester Environment Fund to assess whether some of our countryside sites can play a role in delivering BNG where developers cannot achieve this fully on the development site. This work is ongoing.
- 4.74 In terms of Policy N3 the council has published a <u>Green Infrastructure Strategy</u>¹⁵ as detailed in Section 2, which also included an updated open space audit.
- 4.75 The Green Infrastructure Strategy identified seven priority themes:
 - thriving wildlife for Oldham;
 - carbon neutral Oldham;
 - healthy and active communities;
 - · green access for all;
 - distinctive landscapes;
 - slowing the flow and a quality water environment; and
 - sustainable growth and green jobs.
- 4.76 Green Infrastructure assets can each serve one or more functions.
- 4.77 Development should aim to incorporate Green Infrastructure assets that are multifunctional by supporting as many of the above themes as possible.
- 4.78 The Green Infrastructure Strategy provides an up-to-date assessment of current Green Infrastructure provision and opportunities using existing data sets. The spatial data sets produced within the Green Infrastructure Strategy, highlight opportunity areas aligned to local need and can be used to guide development decisions.
- 4.79 The council has embedded some of the data sets from the Green Infrastructure Strategy onto an <u>interactive map</u>¹⁶ on the council's website. The webmap will be updated overtime with more GI data.
- 4.79 The Green Infrastructure Strategy sets out a step-by-step guide as to how to implement the strategy when considering a development proposal.

¹⁵ This strategy can be found at:

¹⁶ The interactive Green Infrastructure map can be found here:

Proposed Policy Approach and Reasons

Policy N1 Protecting Nature

- 4.80 This policy sets out the hierarchy of nature designations within Oldham from international to local and states that these will be protected from harm, where the highest level of weight is given to international nature designations.
- 4.81 The policy makes clear that development will not be permitted if it would have an adverse impact on the protected species and habitats of the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA.
- 4.82 The policy requires that an ecological assessment is submitted where a site contains, adjoins or may impact on a site which contains nature as described in the above hierarchy.
- 4.83 Protecting nature in line with the hierarchy set out in Policy N1 reflects national planning policy paragraphs 180 and 181. The policy is clear about what nature designations exist within Oldham and how the council will treat applications which may impact on such designations in the context of achieving sustainable development. It seeks to mitigate possible adverse impacts from development.

Policy N2 Restoring Nature

- 4.84 This policy sets out further detail on how statutory BNG and PfE policy JP-G9 should be implemented. The policy also has regard in line with statutory duties to the Local Nature Recovery Strategy (LNRS), which is currently being prepared for Greater Manchester.
- 4.85 The policy sets out principles that development should meet when delivering the statutory requirements where applicable for BNG. These include:
 - 1) Demonstrating how use of the mitigation hierarchy has been applied.
 - Quantification of biodiversity loss and gain through the latest Defra Matric and submission of a Biodiversity Gain Plan and Habitat Management and Monitoring Plan.
 - 3) Avoiding biodiversity loss that cannot be offset by compensation i.e., irreplaceable habitats as defined in NPPF.
 - 4) Additionality achieving off-site Biodiversity Net Gain is additional to other requirements relating to biodiversity.
- 4.86 The policy then addresses circumstances where a developer cannot achieve a minimum of 10% BNG within the development site. The following principles would apply to the selection of off-site areas:
 - a) Proximity to loss
 - b) Best biodiversity value
 - c) Legally secured

4.87 The policy is line with national planning policy section 15 including paragraph 185 (b) on securing measurable net gains for biodiversity. The policy clarifies the approach that is being brought forward by statutory tools and secondary legislation. The policy approach also reflects Oldham's approach to making off site BNG credits available on its own land ownership where applicants need off site solutions. The policy has been prepared through working with GMCA and GM authorities in meetings on nature recovery and seeks to ensure that meaningful BNG can take place.

Policy N3 Enhancing Green Infrastructure through development

- 4.88 Policy N3 requires new development to make an appropriate contribution to addressing local needs and opportunities for Green Infrastructure provision by retaining, enhancing and creating green spaces and corridors.
- 4.89 The policy seeks to be fair and pragmatic and requests that householder and change of use applications rather than meeting identified needs should aim to support biodiversity through practical measures such as installation of swift boxes and bat boxes.
- 4.90 The policy sets out three specific criteria for developments for 20 homes and over or non-residential development of 1000 sqm or more which is focussed on enhancing landscape setting; enhancing pedestrian and cycle connectivity and for residential or mixed use developments provide for the provision of food (e.g. allotments and community gardens) where possible.
- 4.91 This approach has been informed by the findings of the Green Infrastructure Strategy which recommended specific measures for medium to large sites (paragraph 7.13 of the GI Strategy), which the council has incorporated some of these into this part of the policy. The council also determined that our medium to large housing sites generally are those of 20 dwellings or more from past delivery and approvals.
- 4.92 Some of the suggested criteria for larger sites were not included in this part of the policy for larger sites as it is considered that they may apply to smaller development e.g. incorporation of SUDS, covered by policies elsewhere and retaining trees.
- 4.93 The next part of the policy sets out the requirements that all development (other than householder and change of use) must meet which includes a further six criteria relating to:
 - 1. protecting and improving the Green Infrastructure network;
 - 2. providing new Green Infrastructure and/or introduce multifunctional use of existing green spaces;
 - 3. demonstrating how existing trees and hedgerows and their health have been retained;
 - 4. aiming for 20% tree cover, except where the existing peatland habitat takes precedence;
 - 5. using opportunities, where present, to create continuous and enlarged open space adjacent to the rivers and removing poor buildings that currently encroach up to the bank top of watercourses; and

- 6. providing a long-term resourcing plan for the management and cyclical renewal of Green Infrastructure assets.
- 4.94 This part of the policy reflects the recommendations of the Green Infrastructure Strategy policy recommendations.
- 4.95 The approach is in line with national planning policy section 15 and seeks to ensure that new development protects and incorporates GI into the natural and built environment in a manner that is proportionate to the development.

Integrated Assessment

- 4.96 Policy N1 and N3 scored positively or neutral. No mitigation to the policy was required as a result of the IA process.
- 4.97 Policy N2 also scored positively or neutral, however one uncertain was given to acknowledge that 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 minerals as such. Therefore, no mitigation was needed and the Minerals DPD addresses minerals.
- 4.98 The policies were not screened in by the HRA. The HRA notes that policies N1 and N3 will act to mitigate any possible increases in recreational pressures and any possible increases in air pollution, and which will serve to protect designated sites.

Policy N4 Tree Replacement

Feedback from Issues and Options consultation

- 4.99 Comments received at Issues and Options stage relevant to the above policy included:
 - Policy protecting trees is needed and could link to strategies such as City of Trees.
 - Need to make clear that trees are protected in conservation areas or those covered by Tree Preservation orders (TPOs).

Issues to be addressed

- 4.100 The Natural Environment Topic Paper at Issues and Options stage identified the need to:
 - protect and enhance nature designations, biodiversity, ecological networks and geodiversity.
 - move away from a net loss of biodiversity to achieving net gains for nature and contribute to conserving and enhancing the natural environment and reducing pollution.

- protect ancient woodland, increase tree cover through new tree planting, promote positive Woodland Management and management of recreational pressures.
- 4.101 The Scoping Report has since been updated (Update 2) and identifies the issues to be addressed including the need to:
 - protect and enhance biodiversity, geodiversity and ecological networks and a multi-functional green infrastructure network.
- 4.102 The scoping report also identified issues in relation to climate change, health, water, air etc which link to these policies.

Evidence Base

- 4.103 The preferred approach of using a <u>CAVAT</u>¹⁷ (Capital Asset Valuation of Amenity Trees) valuation has come from working with the council's Arboricultural technician and countryside officer on their expertise on what is most suitable for tree replacement.
- 4.104 CAVAT has been used for over 15 years and is used by over half the UK'S local authorities, following review and testing with experienced practitioners.
- 4.105 Having an approach where developers pay more the more mature the tree is (i.e the wider stem diameter) will encourage developers to avoid loss of mature trees.
- 4.106 This approach, although it is not the adopted local policy, has already informally been used in Oldham with developers' agreement on an ad hoc basis.
- 4.107 In addition, the Green Infrastructure Strategy confirms that tree cover is Oldham's planning boundary is 13.4% and sets a target to achieve 20% tree cover.
- 4.108 It is important therefore that the number of trees lost to development are minimised following the mitigation hierarchy and adequately compensated, where required.

Proposed Policy Approach and Reasons

- 4.109 Policy N4 sets out a fixed number system to secure new trees in replacement for tree removals, which will only be acceptable after the applicant has demonstrated exceptional justification for the tree removal.
- 4.110 The number of replacement trees starts at two and goes up to nine trees for each tree lost depending on the stem diameter for Category A (high quality) and Category B (medium) trees. Category C trees (low quality) would be replaced on a one-to-one basis.
- 4.111 This is consistent with the PfE Policy JP-G7 which states that where development would result in the loss of existing trees, requiring replacement on the basis of two new trees for each tree lost, or other measures that would also result in a net enhancement in the character and quality of the treescape and biodiversity value in

¹⁷ Information on CAVAT can be found at: https://www.ltoa.org.uk/resources/cavat

- the local area, with a preference for on-site provision. The policy as a whole will result in net enhancement in the character and quality of the treescape and biodiversity value in the local area.
- 4.112 The policy approach has been informed by the CAVAT which is widely recognised and used, which provides a tested method of calculating replacement trees for proposed tree lost and has already informally been used on an ad hoc basis by Oldham council officers, in agreement with developers. The approach will help minimise tree loss and help achieve the borough's tree target therefore contributing towards meeting needs assessed in the GI Strategy.

Integrated Assessment

4.113 Policy E4 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. Further Work and Next Steps

- 5.1 Between the Draft Plan stage and Publication stage any feedback on proposed Green Belt boundary changes will be considered.
- 5.2 In relation to Local Green Spaces, the assessment will be updated if required, to feed in any new available evidence.
- 5.3 In relation to Dark Skies the GIS will be incorporated into the Policies Map to reflect category 1 and 2 as specified in the policy.
- 5.4 The council hopes to review the green corridors designation to ensure that it is fit for purpose.
- 5.5 For all policies any comments received will be considered and any necessary policy amendments made.

Appendix 1 Proposed Green Belt boundary change and reason

Table 1: Proposed Green Belt boundary change and reason

Green Belt Map	Reason for Green Belt boundary amend
Alexandra	
Map 1: Alexandra Road	To achieve a clear boundary up to footpath / technical map change
Chadderton North	
Map 2: 2 Irk Vale Drive	To achieve a clear boundary defined by the residential curtilage / remove minor overlap with residential curtilage
Map 3: Burnley Lane	To achieve a clear boundary up to Burnley Lane / technical map change
Map 4: Haigh Lane and Chadderton Hall Road	To achieve a clear boundary up to up to Haigh Lane / technical map change
Map 5: Haigh Lane	To achieve a clear boundary defined by Towpath to Rochdale Canal
Map 6: Riverside and Rookwood	To achieve a clear boundary defined by Rochdale Canal towpath
Crompton:	
Map 7: Gazey's Farm	To achieve a clear boundary up to track by Gazey's Farm / technical map change
Map 8: Mossgate Road	To achieve a clear boundary up to Mossgate Road (track) / technical map change
Map 9: Mossgate Road	To achieve a clear boundary up to Mossgate Road (track) / technical map change
Map 10: Thornham Road	To achieve a clear boundary up to Thornham Road / technical map change
Failsworth East	
Map 11: Cutler Hill Road	To achieve a clear boundary up to Cutler Hill Road
Map 12: Farmstead Clsoe,	To achieve a clear boundary through adding open land north of Farmstead Close to Green Belt
Map 13: Hartshead Crescent	To achieve a clear boundary up to Hartshead Crescent / technical map change
Failsworth West	
Map 14: Rose Hey Lane and Green Lane	To achieve a clear boundary up to Rose Hey Lane and Green Lane / technical map change
Hollinwood	
Map 15: Coal Pit Lane	Technical Map change at Coal Pit Lane
Royton North	
Map 16: 32 Tandlewood Park	To achieve a clear boundary up curtilage of 32 Tandlewood Park
Map 17: Garden Terrace	To achieve a clear boundary at Garden Terrace / technical map change

Green Belt Map	Reason for Green Belt boundary amend
Map 18: West of Harewood Drive	To achieve a clear boundary west of Harewood Drive, incorporating whole of
	buildings / technical map change
Map 19: Street Bridge Road	To achieve a clear boundary at Street Bridge
	Road / technical map change
Map 20: Tandlewood Park	To achieve a clear boundary at Tandlewood
	Park / technical map change
Map 21: Thorp Cottage and Brima House	To achieve a clear boundary at Thorp Cottage and Brima House, incorporating whole buildings / technical map change
Royton South	
Map 22: Park Lane	To achieve a clear boundary up to Park Lane / technical map change
Saddleworth North	
Map 23: Barnmeen, Austerlands	To achieve a clear boundary along hedgerow at Barnmeen
Map 24: Brownhill Lane, Uppermill	To achieve a clear boundary up to Brownhill Lane / technical map change
Map 25: Clifton Holmes, Delph	To achieve a clear boundary up to Clifton Holmes / technical map change
Map 26: Clifton Holmes, Delph	To achieve a clear boundary along Clifton Holmes / technical map change
Map 27: Dale Road, Rumbles Lane and	To achieve a clear boundary up to Dale
Ainsbrook Avenue, Delph	Road, Rumbles Lane and Ainsbrook Avenue / technical map change
Map 28: Delph Lane, Delph	To achieve a clear boundary up to Delph Lane / technical map change
Map 29: Delph New Road, Dobcross	To achieve a clear boundary up to Delph New Road / technical map change
Map 30: Delph New Road, Delph	To achieve a clear boundary up to Delph New Road / technical map change
Map 31: Denshaw Fold, Denshaw	To achieve a clear boundary following lines of Denshaw Fold / technical map change
Map 32: Denshaw Road, Delph	To achieve a clear boundary up to Denshaw Road / technical map change
Map 33: 28 and 34 Grains Road, Delph	To achieve a clear boundary adjacent to 28 and 34 Grains Road / technical map change
Map 34: Harrop Green Lane, Diggle	To achieve a clear boundary up to Harrop Green Lane / technical map change
Map 35: Hillcrest Cottage, Strinesdale	To achieve a clear boundary incorporating whole building at Hillcrest Cottage, Strinesdale
Map 36: North of Holland Close, Delph	To achieve a clear boundary along road and footpath by Holland Close / technical map change
Map 37: Husteads Lane, Dobcross	To achieve a clear boundary up to Husteads Lane / technical map change

Green Belt Map	Reason for Green Belt boundary amend
Map 38: Knott Hill Lane, Delph	To achieve a clear boundary along Knott Hill
	Lane / technical map change
Map 39: Ladcastle Road, Dobcross	To achieve a clear boundary up to Ladcastle
	Road / technical map change
Map 40: Long Lane, Dobcross	To achieve a clear boundary up to Long
	Lane / technical map change
Map 41: Pingle Lane, Delph	To achieve a clear boundary along Pingle
	Lane / technical map change
Map 42: Platt Lane, Dobcross	To achieve a clear boundary up to Platt Lane
	/ technical map change
Map 43: Rochdale Road, Denshaw	To achieve a clear boundary up to Rochdale
	Road / technical map change
Map 44: Sandy Lane, Dobcross	To achieve a clear boundary up to Sandy
	Lane / technical map change
Map 45: Stoneswood Road, Delph	To achieve a clear boundary up to
	Stoneswood Road / technical map change
Map 46: Stoneswood Road, Delph	To achieve a clear boundary up to
	Stoneswood Road / technical map change
Map 47: Streethouse Lane, Dobcross	To achieve a clear boundary up to
	Streethouse Lane / technical map change
Map 48: Thorpe Lane, Scouthead	To achieve a clear boundary up to Thorpe
	Lane / technical map change
Map 49: Wall Hill Road	To achieve a clear boundary up to Wall Hill
	Road / technical map change
Map 50: Ward Lane, Diggle	To achieve a clear boundary up to Ward
	Lane / technical map change
Map 51: Woodbrook Road, Springhead	To achieve a clear boundary up to
	Woodbrook Road to include whole buildings
	and curtilages / technical map change
Map 52: Woodbrook Road, Springhead	To achieve a clear boundary by removing
	remainder of dwelling and curtilage at end of
Man 50 Was discuss Kasani Dalah	Woodbrook Road
Map 53: Woodhouse Knowl, Delph	To achieve a clear boundary by adding land
Coddless and Could	up to Woodhouse Knowl
Saddleworth South	To achieve a clean have demonstrate AC40 /
Map 54: A640 / Oldham Road, Greenfield	To achieve a clear boundary up to A640 /
Mon FF: Dograhust Lang Constitution	Oldham Road / technical map change
Map 55: Boarshurt Lane, Greenfield	To achieve a clear boundary up to
Man 56: Rurnodgo Lana Croonfield	Boardshurt Lane / technical map change To achieve a clear boundary up to Burnedge
Map 56: Burnedge Lane, Greenfield	Lane / technical map change
Man 57: Carr Lang Graphiald	
Map 57: Carr Lane, Greenfield	To achieve a clear boundary up to Carr Lane / technical map change
Map 58: Church Road, Greenfield	
iwap Jo. Church Noau, Greenheid	To achieve a clear boundary along Huddersfield Narrow Canal / technical map
	change
	Glange

Green Belt Map	Reason for Green Belt boundary amend
Map 59: Church Road, Uppermill	To achieve a clear boundary up to Church
	Road / technical map change
Map 60: Friezeland Lane, Greenfield	To achieve a clear boundary up to
	Friezeland Lane / technical map change
Map 61: Frizeland Lane, Greenfield	To achieve a clear boundary up to
	Friezeland Lane / technical map change
Map 62: Lover Lane, Grasscroft	To achieve a clear boundary up to Lovers
	Lane / technical map change
Map 63: Manchester Road, Greenfield	To achieve a clear boundary up to
	Manchester Road / technical map change
Map 64: Park Lane, Greenfield	To achieve a clear boundary up to Park Lane
	/ technical map change
Map 65: Shaw Hall Bank Road, Greenfield	To achieve a clear boundary up to tree line
	along Shaw Hall Bank Road / technical map
	change
Map 66: Shaws Lane, Uppermill	To achieve a clear boundary up to Shaws
	Lane / technical map change
Map 67: Swallow Bank, Greenfield	To achieve a clear boundary through
	removing Green Belt from curtilage and road
O I III a di Maria di II a	forming boundary
Saddleworth West and Lees	T 1: 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Map 68: Knowls Lane, Springhead	To achieve a clear boundary up to Knowls
Man CO. Laurtan Fald Coninghand	Lane / technical map change
Map 69: Lawton Fold, Springhead	To achieve a clear boundary up to Lawton
Man 70: Stangahraak Bood, Springhaad	Fold / technical map change
Map 70: Stonesbreak Road, Springhead	To achieve a clear boundary up to Stonebreaks Road / technical map change
Shaw	Storiebreaks Road / technical map change
Map 71: Buckstones Road	To achieve a clear boundary up to
Wap 7 1. Buckstones Road	Buckstones Road / technical map change
Map 72: Button Hole	To achieve a clear boundary up to Button
Wap 72. Button Flore	Hole Road
Map 73: West of Brookfield	To achieve a clear boundary / technical map
Map 10. West of Brooklicia	change
Map 74: West of St. Saviour's Church	To achieve a clear boundary up to road, west
Wap 14. Woot of ot. Gaviour o official	of St. Saviour's Church
St James:	2. 2 3411341 3 31141311
Map 75: Turf Pit Lane, Moorside	To achieve a clear boundary up to Turf Pit
The state of the s	Lane / technical map change
Waterhead	
Map 76: Counthill Road	To achieve a clear boundary up to Counthill
	Road / technical map change
Map 77: Counthill Road	To achieve a clear boundary up to Counthill
•	Road / technical map change
Map 78: Culvert Street, Waterhead	To achieve a clear boundary up to Culvert
·	Street / technical map change
L	

Green Belt Map	Reason for Green Belt boundary amend	
Map 79:	To achieve a clear boundary up to	
	Waterworks Road / technical map change	