

Oldham

Local Plan

Publication Plan: Integrated Assessment Non-Technical Summary

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Oldham
Council

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1 Introduction

- 1.1 This is a non-technical summary of the Integrated Assessment (IA) that has been prepared for the Local Plan review: Publication Plan.
- 1.2 The IA includes the following:
 - a Sustainability Appraisal (SA), incorporating the requirements of Strategic Environmental Assessment (SEA);
 - a Habitat Regulations Assessment (HRA);
 - an Equalities Impact Assessment (EIA); and
 - a Health Impact Assessment (HIA).
- 1.3 The Oldham Local Plan will apply to the whole borough, except for that part of the borough that is the planning responsibility of the Peak District National Park Authority.

2 The Purpose of Integrated Assessment

- 2.1 The purpose of the IA is to assess the environmental, social and economic performance of the Local Plan. The assessment is an iterative process that is carried out as the Local Plan progresses. This is a Non-Technical Summary of the IA of the Publication Local Plan.
- 2.2 In recognition of the linkages across the various assessments (that is the SA / SEA, HRA, EIA and HIA) these have been brought into a single 'Integrated Assessment' report. Each element of the IA is explained below.

Sustainability Appraisal and Strategic Environmental Assessment

- 2.3 The role of a SA is to promote sustainable development through assessing the emerging Local Plan against economic, environmental and social objectives. Significant adverse effects should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).
- 2.4 The Planning and Compulsory Purchase Act (2004) requires the Council to carry out a SA of each of the proposals in a Local Plan and to prepare a Local Plan with the objective of contributing to the achievement of sustainable development.
- 2.5 The Council is also required, under European Directive 2001/42/EC (the Strategic Environmental Assessment Directive) and The Environmental Assessment of Plans and Programmes Regulations 2004, to carry out an environmental assessment.

3 The Integrated Assessment Process

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

Figure 1: Stages of the Integrated Assessment Process

DPD: Evidence gathering and engagement

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

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

DPD: Production and consultation

IA Stages and tasks

Stage B: Developing and refining options and assessing effects

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

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

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

Submit draft DPD and supporting documents for independent examination

Outcome of examination / Consider implications for SA/SEA compliance

Local Plan adopted

Stage E: Post adoption reporting and monitoring

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

4 Findings of the Integrated Assessment

Stage A

- 4.1 The Scoping Report is Stage A. It includes a section on each of the following:
- Relevant policies, plans and programmes, and sustainability objectives;
 - Baseline information;
 - Sustainability issues and problems;
 - The IA framework; and
 - How the prescribed consultation bodies have been consulted on, and fed into, the scope of the IA report.
- 4.2 A summary of the key issues and environmental, social and economic problems identified through the Scoping Report Update 3 are set out in Table 1 below. These have been identified through Stage 1 'Identify other relevant policies, plans and programmes, and sustainability objectives' and Stage A2 'Collect baseline information' documented in Appendix 1 and 2 of the IA.

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

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

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

- 4.3 The issues and problems listed in Table 1 above have then been translated into the proposed IA Objectives. These are accompanied by corresponding indicators so that the issues and problems can be assessed and monitored. The proposed IA Objectives are set out in Table 2 below:

Table 2: Proposed IA Objectives

No.	Proposed IA Objectives
1	To protect, conserve and enhance a high-quality multifunctional green infrastructure network, including biodiversity, priority species, habitats and geodiversity to become more ecologically connected.
2	To promote quality and accessible open spaces.
3	To protect and enhance the character and appearance of landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.
4	To protect, conserve and enhance the historic environment, heritage assets and their setting.
5	To promote high-quality, beautiful design that meets local design expectations.
6	To ensure land and buildings are used in an effective and efficient manner, maximising the use of brownfield land.
7	To ensure appropriate provision of supporting infrastructure to meet development needs.
8	To improve health and well-being and reduce health inequalities.
9	To minimise and mitigate against flood risk and adapt to the effects of flood risk.
10	To protect and improve the quality of water bodies and river corridors and availability of water resources.
11	To protect and improve soil quality, best and most versatile agricultural land, and remediate contaminated land.
12	To minimise energy use, promote energy efficiency and the use of renewable and low carbon energy.

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

- 4.4 To enable monitoring of these proposed IA Objectives a set of IA Monitoring Indicators have been proposed. These can be found in Section 2 of the IA Scoping Report Update 3.

Stage B

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

Issues and Options

- 4.6 A summary of the IA appraisal carried out at the Issues and Option stage can be found in Section 6 of the IA Report.
- 4.7 At Issues and Options stage, the vision, plan objectives and several spatial options were assessed including reasonable alternatives. The likely effects of each of these options / alternatives were considered and any mitigation / enhancements to maximise beneficial effects identified.
- 4.8 How the spatial options have informed the Publication Plan is set out in Section 8 (Table 68) in the IA report.
- 4.9 Table 3 below provides a summary of the options, the outcome of the IA process at Issues and options stage and how the options have informed the preferred approach at Publication Plan stage.

Table 3: Summary of IA Appraisal of Spatial Options

Spatial Option	Appraisal Summary	How this has informed the Publication Plan policy
AFFORDABLE HOMES		
<p>A: Should an affordable housing requirement be applied borough-wide?</p> <p>B: Should there be a different affordable housing requirement for different parts of the borough, depending on their need?</p>	<p>Option B (targeted approach to affordable housing) results in significantly more positive outcomes overall than Option A (boroughwide approach).</p>	<p>The preferred approach is outlined in the Publication Plan in Policy H5 Affordable Housing.</p> <p>The policy requires all residential developments of 10 homes or more to provide a variable amount of affordable housing based on value area (low/ medium/ high) and land type (brownfield/ greenfield).</p> <p>Whilst Open B scored higher, the policy has evolved and has been informed by the Local Plan Viability Assessment (2025).</p> <p>The policy reflects Option B to some extent as it sets a variable requirement for different parts of the borough, based on value areas rather than need. The policy requirement is a minimum.</p> <p>In the IA of the Publication Local Plan Policy H5 has scored neutral, positives and significantly positives scores.</p>
HOMES IN MULTIPLE OCCUPATION		
<p>A: If there is found to be a concentration of HMOs within a particular area, would you agree with the introduction of an Article 4 direction to remove permitted development rights for HMOs in specific areas, as necessary?</p> <p>B: If there is found to be a concentration of HMOs within a particular area, would you agree with the introduction of an Article 4 direction to remove permitted development rights for HMOs boroughwide?</p>	<p>The IA appraisal for Homes in Multiple Occupation (HMO) Spatial Options A and B both scored the same.</p>	<p>The approach to HMOs is outlined in Policy H6 Houses in Multiple Occupation.</p> <p>The IA did not indicate a stronger performing option.</p> <p>The policy sets out criteria for HMOs to meet. In addition, permission will not be granted where the proportion of HMOs result in them representing 10% or more of residential properties within a 50m radius measured from the centre of the application site. This boroughwide approach would reflect Spatial Option B.</p>

Spatial Option	Appraisal Summary	How this has informed the Publication Plan policy
		<p>There is further policy stated for Oldham Town Centre, which recognises that HMOs are best suited to locations that are well-connected to services, facilities and public transport.</p> <p>In relation to the Article 4 Direction, the Council introduced a boroughwide non-immediate Article 4 Direction removing the permitted development right to convert a dwellinghouse (Use Class C3) into a House in Multiple Occupation (HMO) (Use Class C4) for up to six residents (small HMO). Representations were sought between 6 October until 16 November 2025. The Article 4 Direction came into effect on 1 January 2026.</p> <p>Policy H6 scored a mixture of neutral, positive and significantly positive scores.</p>
HOUSING ALLOCATIONS		
<p>A: Should Oldham focus the identification of housing allocations within the urban area – in Oldham Town Centre, the borough's other centres, key public transport corridors, on previously developed land, vacant and under-utilised buildings (including the re-use of employment sites and mills, where appropriate)?</p> <p>B: Should Oldham focus the identification of housing allocations within the urban area as in Option A, but also include within the scope open spaces (where identified as surplus to requirements through the council's open space study), land currently designated as Other Protected Open Land where it does not meet LGS criteria, and previously developed land in the Green Belt where this meets national planning policy.</p>	<p>The IA of the housing allocation spatial options shows at this stage generally there are more uncertainties around Option B (brownfield / urban area plus greenfield) than Option A (brownfield / urban area), which would need to be further appraised and mitigated where required, if this option was selected.</p>	<p>The Local Plan no longer includes site allocations and so this option is not relevant.</p> <p>However, the Strategic Housing Land Availability Assessment (SHLAA) outlines the housing land supply. The majority of sites identified within the SHLAA are brownfield, however there are also a number of sites which are made up of both brownfield and greenfield land, and also some greenfield sites. It is important in meeting our housing requirement and addressing local needs, that we deliver all sites within our housing land supply.</p> <p>In this context Option B has been applied. It incorporates Option A and makes the most of sites in the urban areas, whilst ensuring that we are identifying a sufficient variety of sites through the inclusion of some greenfield sites where appropriate.</p>

Spatial Option	Appraisal Summary	How this has informed the Publication Plan policy
EMPLOYMENT ALLOCATIONS		
<p>A: To focus more on the connectivity to our existing employment sites and neighbouring districts key employment sites.</p> <p>B: A combination of providing some new employment land and improving connectivity to existing and neighbouring districts key employment sites.</p>	<p>The IA of the employment allocation options shows that at this stage there are more uncertainties with Option B (new employment land improving employment connectivity to existing employment sites). If taken forward as an option this would need further assessment and mitigation if required in comparison to Option A which scores more significantly positive scores (improve connectivity to existing employment sites).</p> <p>The spatial options were enhanced by making reference to sustainable connectivity.</p>	<p>The Local Plan no longer includes site allocations and so this option is not relevant.</p> <p>The employment land supply is made up of land designated for employment in PfE, sites with planning permission and come sites that were previously allocated in the joint DPD for employment.</p> <p>The majority of sites identified within the employment land supply are brownfield, however there are also a small number of sites which are greenfield land. To contribute towards achieving the overall employment floorspace requirements set out in PfE, it is important that we deliver all sites within our employment land supply.</p> <p>In this context Option A has been applied as we are focussing on making the best use of our existing employment land supply.</p>
HEALTH AND WELLBEING		
<p>A: Should there be a policy which restricts the location of hot food takeaways within 400m of a school?</p>	<p>Option A, B and C scored neutral against most IA objectives. However, Option B and C scored a significantly positive</p>	<p>The preferred approach is outlined in Policy CO7 Hot Food Takeaways and fast-food outlets.</p> <p>The policy sets out the parameters for approving hot food takeaways.</p>

Spatial Option	Appraisal Summary	How this has informed the Publication Plan policy
<p>B: Should there be a policy which restricts the location of hot food takeaways in areas with high levels of obesity?</p> <p>C: Should there be a policy which restricts the location of hot food takeaways within 400m of a school and in areas with high levels of obesity?</p>	<p>impact against the IA objective 'To improve health and well-being and reduce health inequalities'.</p> <p>Option C scored significantly positive against a further two IA objectives relating to local environmental quality and centres and therefore higher overall.</p>	<p>Outside of Oldham Town Centre permission for such uses will not be granted where they are within 400m of a primary or secondary school; or they are within 400m of places where children and young people congregate.</p> <p>The policy also requires that applications for hot-food takeaways must be supported by a Health Impact Assessment (HIA).</p> <p>Since preparation of the Draft Plan, an updated version of NPPF was published in December 2024. The approach to hot-food takeaways and fast-food outlets is set out in paragraph 97 of NPPF. It states that applications should be refused for such uses where they are:</p> <ul style="list-style-type: none"> a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour. <p>Evidence shows that outside of Oldham Town Centre much of the borough is within walking distance (defined through the Local Plan as being 400m) of schools and other places where children and young people congregate. As such and given that it is either a) or b), those locations where there is evidence that a concentration of such uses having an adverse impact on local health, pollution or anti-social-behaviour have not been identified.</p> <p>The approach taken in the Publication Plan is considered a reasonable alternative to options A, B and C considered at Issues and Options stage.</p>

Spatial Option	Appraisal Summary	How this has informed the Publication Plan policy
		The IA undertaken on this preferred approach has scored a mixture of neutral, positive and significantly positive scores.

Draft Plan Stage

- 4.10 A summary of the IA appraisal carried out at the Draft Plan stage can be found in Section 7 of the IA Report.
- 4.11 At Draft Plan stage, the vision, plan objectives and draft policies were assessed. The likely effects of each of these were considered and any mitigation / enhancements to maximise beneficial effects identified.
- 4.12 Due to the IA process Plan Objective 2 (skills) and Policies H5 Homes for Disabled People; OTC2 Protecting and Enhancing Oldham Town Centre Conservation Area; CC2 Renewable and Low Carbon Energy and HE5 Canals were enhanced and Policy OL3 Extensions and alternations to existing buildings within the Green Belt was clarified.

Publication Plan

- 4.13 The remainder of this Non-Technical Summary provides details of the IA appraisal carried out on the Publication Plan.
- 4.14 This stage appraised the vision, plan objectives and policies in the Publication Plan stage of the Local Plan review. A summary of the findings is set out in Tables 4 and 5, where details of scoring can be found as well as any adverse and beneficial effects that may need to be mitigated or maximised. Full details can be found in Section 8 of the Integrated Assessment.

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

Part of Publication Plan assessed	Scoring	Adverse effects	Beneficial effects
Vision	The vision scored a mixture of neutral, positives and significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	The vision scored positively / significantly positive against 24 IA objectives where it would have a beneficial impact. Minor amendments had been made to the vision since Draft Plan stage, and it was considered that wording should be added back to the vision to link to local environmental quality (IA15) to support the score given. The vision has been amended to refer to a 'clean, green and healthy environment'.
PO1 Building quality homes to meet local needs and diversify the housing offer	PO1 scored a mixture of neutral, positives and significantly positive scores. There were 17 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 1.
PO2 Providing opportunities to learn and gain new skills	PO2 scored a mixture of neutral, positives and significantly positive scores. There were 18 neutral scores and 8 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	The objective scored a lot of neutrals given its specific nature. No enhancements were identified.
PO3 Boosting northern competitiveness by providing access to employment opportunities and growing local businesses	PO3 scored a mixture of neutral, positives and significantly positive scores. There were 12 neutral scores and 14 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 3.

Part of Publication Plan assessed	Scoring	Adverse effects	Beneficial effects
PO4 Supporting the regeneration of Oldham Town Centre and creating thriving centres	PO4 scored a mixture of neutral, positives and significantly positive scores. There were 3 neutral scores and 23 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects	No enhancements were identified to plan objective 4.
PO5 Protecting and enhancing Oldham's landscapes	PO5 scored a mixture of neutral, positives and significantly positive scores. There were 7 neutral scores and 19 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 5.
PO6 Protecting, restoring and enhancing the natural environment	PO6 scored a mixture of neutral, positives and significantly positive scores. There were 3 neutral scores and 23 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 6.
PO7 Promoting sustainable development that mitigates and adapts to climate change	PO7 scored a mixture of neutral, positives and significantly positive scores. There were 8 neutral scores and 18 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 7.
PO8 Uplifting the health and well-being of our residents and local communities	PO8 scored a mixture of neutral, positives and significantly positive scores. There were 6 neutral scores and 20 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 8.
PO9 Improving and valuing a better built environment	PO9 scored a mixture of neutral, positives and significantly positive scores. There were 8 neutral scores and	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 9.

Part of Publication Plan assessed	Scoring	Adverse effects	Beneficial effects
	18 positive or significantly positive scores.		
PO10 Promoting accessible and sustainable transport choices	PO10 scored a mixture of neutral, positives and significantly positive scores. There were 9 neutral scores and 17 positive or significantly positive scores.	No adverse effects were identified therefore no changes were required to mitigate adverse effects.	No enhancements were identified to plan objective 10.

Table 5: Summary of the appraisal of the Oldham Publication Plan Policies

Policy	Scoring	Mitigation	Enhancement
HOMES			
Policy H1: Delivering a Diverse and Sustainable Housing Offer	Policy H1 scored a mixture of potentially negative, neutral, positive and significantly positive scores. There were 13 neutral scores, 12 positive or significantly positive scores and one negative score.	<p>A negative score was given as sites in the housing land supply could include open spaces. Mitigation would be provided through Policy CO1.</p> <p>The policy has been screened in by the HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address any likely significant effects.</p>	None
Policy H2: Density of New Housing	Policy H2 scored a mixture of neutral, positive and significantly positive scores. There were 12 neutral scores and 14 positive or significantly positive scores.	The HRA has screened the policy out.	None
Policy H3: Housing Mix	Policy H3 scored a mixture of neutral, positive and significantly positive scores. There were 14 neutral scores and 12 positive or significantly positive scores.	The HRA has screened the policy out.	None
Policy H4: Providing for Local Housing Needs	Policy H4 scored a mixture of neutral, positive and significantly positive scores. There were 15 neutral scores and 11 positive or significantly positive scores.	The HRA has screened the policy out.	None
Policy H5: Affordable Housing	Policy H5 scored a mixture of neutral, positive and significantly	The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
	positive scores. There were 18 neutral scores and 8 positive or significantly positive.		
Policy H6: Houses in Multiple Occupation	Policy H6 scored a mixture of neutral, positive and significantly positive scores. There were 14 neutral scores and 12 positive or significantly positive scores.	The HRA has screened the policy out.	None
Policy H7: Gypsies, Travellers and Travelling Showpeople	Policy H7 scored a mixture of neutral, positive and significantly positive scores. There were 18 neutral scores and 8 positive or significantly positive scores.	The HRA has screened the policy out.	None
ECONOMY AND EMPLOYMENT			
Policy E1 – Employment Floorspace Requirements	Policy E1 scored a mixture of neutral, positive and significantly positive scores. There were 20 neutral scores and 6 positive or significantly positive scores.	The HRA has screened the policy in as there may be possible impacts from direct land take and increases in diffuse air and water pollution. The HRA identifies mitigation measures to address any likely significant effects.	None
Policy E2 – Business and Employment Areas	Policy E2 scored a mixture of neutral, positives and significantly positive scores. There were 18 neutral scores and 8 positive or significantly positive scores. IA14 (air quality) increases from positive in the short and medium term to significantly positive in the long term.	The HRA has screened the policy out.	None
Policy E3 – Exceptions within	Policy E3 scored a mixture of uncertain, neutral, positive and	The policy scored an uncertain against IA23 (housing) as non-	None

Policy	Scoring	Mitigation	Enhancement
Business and Employment Areas	significantly positive scores. There were 19 neutral scores and 6 positive or significantly positive scores and one uncertain score.	employment uses may be permitted, including housing if policy exceptions are met. No mitigation is required for this as other plan policies provide the decision-making framework. The HRA has screened the policy out.	
Policy E4 – Employment sites outside of Business and Employment Areas	Policy E4 scored a mixture of uncertain, neutral, positive and significantly positive scores. There were 20 neutral scores and 5 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy E5– Reuse and redevelopment of Mill Buildings	Policy E5 scored a mixture of neutral, positive and significantly positive scores. There were 20 neutral scores and 6 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
CENTRES			
Policy C1 – Our Centres	Policy C1 scored a mixture of neutral, positive and significantly positive scores. There were 12 neutral scores and 14 positive or significantly positive scores. In relation to IA18 (regeneration) and IA19 (economic growth) the effects increase from positive in the short term to significantly positive in the medium and long term.	None. The HRA has screened the policy out.	None
Policy C2 – Protecting the	Policy C2 scored a mixture of neutral, positive and significantly	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
vitality of our centres	positive scores. There were 16 neutral scores and 10 positive or significantly positive scores.		
Policy C3 – Changes of use and redevelopment within the borough's centres	<p>Policy C3 scored a mixture of neutral, positive and significantly positive scores. There were 13 neutral scores and 13 positive or significantly positive scores.</p> <p>In relation to IA18 (regeneration) and IA19 (economic growth) the effects increase from positive in the short term to significantly positive in the long term.</p>	None. The HRA has screened the policy out.	None
Policy C4 – Local Services and Facilities	Policy C4 scored a mixture of neutral, positive and significantly positive scores. There were 16 neutral scores and 10 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
OLDHAM TOWN CENTRE			
Policy OTC1 - Oldham Town Centre	<p>Policy OTC1 scored a mixture of neutral, positive and significantly positive scores. There were 7 neutral scores and 19 positive or significantly positive scores.</p> <p>IA6 (Efficient use of land); IA15 (local environmental quality); IA18 (regeneration); IA19 (economic growth); IA20 (centres); IA21 (tourism) and IA26 (inclusive communities) increased in effects over time from positive in the short</p>	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
	term to significantly positive in the long term.		
Policy OTC2 - Protecting and Enhancing Oldham Town Centre Conservation Area	<p>Policy OTC2 scored a mixture of neutral, positive and significantly positive scores. There were 8 neutral scores and 18 positive or significantly positive scores.</p> <p>IA1 (biodiversity) increased in effects over time from positive in the short and medium term to significantly positive in the long term.</p>	None. The HRA has screened the policy out.	None
Policy OTC3 - Creating a Better Public Realm for Oldham Town Centre	Policy OTC3 scored a mixture of neutral, positive and significantly positive scores. There were 9 neutral scores and 17 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy OTC4 - Green Infrastructure within and around Oldham Town Centre	<p>Policy OTC4 scored a mixture of neutral, positive and significantly positive scores. There were 6 neutral scores and 20 positive or significantly positive scores.</p> <p>IA14 (air quality) increased in effects over time from positive in the short and medium term to significantly positive in the long term.</p>	None. The HRA has screened the policy out.	It was noted during the IA that the policy did not explicitly refer to 'multi-functional' Green Infrastructure and therefore the first sentence of the policy was amended to enhance it to refer to 'multi-functional'. This is reflected in IA1, IA9 and IA13. This amendment did not affect scoring.
Policy OTC5 – Parking in Oldham Town Centre	Policy OTC5 scored a mixture of neutral, positives and significantly positive scores. There were 15 neutral scored and 11 positive or significantly positive.	None. The HRA has screened the policy out.	None
ADDRESSING CLIMATE CHANGE			

Policy	Scoring	Mitigation	Enhancement
Policy CC1 – Renewable & Low Carbon Energy	<p>Policy CC1 scored a mixture of neutral, positive and significantly positive scores. There were 12 neutral scores and 14 positive or significantly positive scores.</p> <p>IA18 (energy) scored positive in the short and medium term to significantly positive in the long term.</p>	<p>The HRA has screened the policy in due to potential impacts from direct land take (wind farms and solar farms), indirect disturbance and loss of functionally linked land.</p> <p>The HRA identifies mitigation measures to address any likely significant effects.</p>	None
Policy CC2 - Managing Flood Risk	Policy CC2 scored a mixture of neutral, positive and significantly positive scores. There were 14 neutral scores and 12 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy CC3 - Sustainable Drainage – Foul and Surface Water	Policy CC3 scored a mixture of neutral, positive and significantly positive scores. There were 15 neutral scores and 11 positive or significantly positive scores.	<p>None. The HRA has screened the policy out.</p> <p>However, the HRA recommends that any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA.</p> <p>This has been added to Policy CC3.</p>	None
Policy CC4 - Water Efficiency	Policy CC4 scored a mixture of neutral, positive and significantly positive scores. There were 17 neutral scores and 9 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy CC5 – Groundwater Source Protection Zones	Policy CC6 scored a mixture of neutral, positive and significantly positive scores. There were 22 neutral scores and 4 positive or significantly positive scores.	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
NATURAL ENVIRONMENT AND OPEN LAND			
Policy OL1 – Consideration for the Peak District National Park	<p>Policy OL1 scored a mixture of potentially negative, neutral, positive and significantly positive scores. There were 17 neutral scores, 8 positive or significantly positive scores and one negative.</p> <p>IA1, IA3, IA4 and IA21 scored positive in the short and medium term to significantly positive in the long term to reflect opportunities to further the national park purposes.</p>	<p>IA12 scored negative as policy could constrain renewable energy, in particular wind energy, however mitigation is not required as this area is unlikely to be acceptable for wind turbines and other plan policies address energy.</p> <p>The HRA has screened the policy out.</p>	None
Policy OL2 – Oldham's Green Belt	<p>Policy OL2 scored a mixture of potentially negative, uncertain, neutral, positive and significantly positive scores. There were 8 neutral scores, 17 positive or significantly positive scores, one uncertain and one negative score.</p> <p>IA12 (energy) scored a mixed score of negative / uncertain as the policy could constrain some types of low carbon energy in the Green Belt.</p>	<p>For IA12 mitigation is not needed as it may not be acceptable for renewable schemes, particularly wind turbines, to be permitted and proposals needs to be determined on their own merits in line with plan policies. Other policies address energy including Local Plan Policy CC2.</p> <p>The HRA has screened the policy out.</p>	None
Policy OL3 - Extensions and alterations to existing buildings within the Green Belt	<p>Policy OL3 scored a mixture of neutral, positive and significantly positive scores. There were 22 neutral scores and 4 positive scores.</p>	<p>None. The HRA has screened the policy out.</p>	None

Policy	Scoring	Mitigation	Enhancement
Policy OL4 - Local Green Spaces	Policy OL4 scored a mixture of neutral, positive and significantly positive scores. There were 8 neutral scores and 18 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy OL5 - Protecting dark skies and tranquillity	Policy OL5 scored a mixture of neutral, positive and significantly positive scores. There were 17 neutral scores and 9 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
ADDRESSING THE BIODIVERSITY EMERGENCY			
Policy N1 Protecting Nature	Policy N1 scored a mixture of neutral, positive and significantly positive scores. There were 14 neutral scores and 12 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy N2 Restoring Nature	<p>Policy N2 scored a mixture of uncertain, neutral, positive and significantly positive scores. There were 7 neutral scores, 18 positive or significantly positive score and one uncertain.</p> <p>IA3 (landscapes) scores positive in the short term to significantly positive in the long term.</p>	<p>None. Uncertainty was expressed as there may be overlap between BNG and minerals. Any offset sites would not be able to be worked for minerals but wouldn't necessarily sterilise as such. Therefore, no mitigation needed and the Minerals DPD addresses minerals.</p> <p>The HRA has screened the policy out.</p>	None
Policy N3 Enhancing Green Infrastructure through development	Policy N3 scored a mixture of neutral, positive and significantly positive scores. There were 5 neutral scores and 21 positive or significantly positive scores.	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
Policy N4 Trees	<p>Policy N4 scored a mixture of neutral, positive and significantly positive scores. There were 14 neutral scores and 12 positive or significantly positive scores.</p> <p>IA8 (health) and IA9 (flood risk) scored neutral in the short term, positive in the medium term and significantly positive in the long term.</p> <p>IA11 (soil quality), scored neutral in the short term to positive in the medium and long term.</p> <p>IA13 (climate change) scored neutral in the short term to significantly positive in the medium and long term.</p> <p>IA14 (air quality) scores positive in the short term to significantly positive in the medium and long term.</p> <p>IA20 (centres) scores positive in the short and medium term to significantly positive in the long term.</p>	None. The HRA has screened the policy out.	None
OLDHAM'S HISTORIC ENVIRONMENT			
Policy HE1 – The Historic Environment	Policy HE1 scored a mixture of neutral, positive and significantly positive scores. There were 9 neutral	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
	scores and 17 positive or significantly positive scores.		
Policy HE2 - Securing the Preservation and Enhancement of Oldham's Heritage Assets	Policy HE2 scored a mixture of neutral, positive and significantly positive scores. There were 10 neutral scores and 16 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy HE3 - Development proposals affecting conservation areas	<p>Policy HE3 scored a mixture of neutral, positive and significantly positive scores. There were 14 neutral scores and 12 positive or significantly positive scores.</p> <p>IA20 (centres) scored positive in the short term to significantly positive in the medium and long term as conservation areas should be enhanced over time.</p>	None. The HRA has screened the policy out.	None
Policy HE4 - Oldham's Mills	Policy HE4 scored a mixture of neutral, positive and significantly positive scores. There were 13 neutral scores and 13 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy HE5 - Canals	Policy HE5 scored a mixture of neutral, positive and significantly positive scores. There were 10 neutral scores and 16 positive or significantly positive scores.	<p>The HRA has screened the policy in due to potential impacts on the Rochdale Canal SAC during any restoration.</p> <p>The HRA identifies mitigation measures to address any likely significant effects.</p>	None
ACHIEVING HIGH QUALITY DESIGN			

Policy	Scoring	Mitigation	Enhancement
Policy D1 – Achieving high quality design	Policy D1 scored a mixture of neutral, positive and significantly positive scores. There were 8 neutral scores and 18 positive or significantly positive scores.	None. The HRA has screened the policy out	None
Policy D2 – Advertisements, Signage and Shop Fronts	Policy D2 scored a mixture of neutral, positive and significantly positive scores. There were 21 neutral scores and 5 positive or significantly positive scores. Effects increase from positive to significantly positive over time against IA 20 (centres).	None. The HRA has screened the policy out	None
Policy D3 – Creating a Better Public Realm in Oldham	Policy D3 scored a mixture of neutral, positive and significantly positive scores. There were 10 neutral scores and 16 positive or significantly positive scores.	None. The HRA has screened the policy out	None
Policy D4 - Extensions and alterations to, and development within the curtilage of a dwellinghouse	Policy D4 scored a mixture of neutral, positives and significantly positive scores. There were 20 neutral scores and 6 positive or significantly positive scores.	None. The HRA has screened the policy out	None
A SUSTAINABLE, ACTIVE, ACCESSIBLE NETWORK FOR OLDHAM			
Policy T1 – Delivering Oldham’s Transport Priorities	Policy T1 scored a mixture of neutral, positive and significantly positive scores. There were 11 neutral scores	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
	and 15 positive or significantly positive scores.		
Policy T2 – Travel Hubs and Park and Ride Facilities	Policy T2 scored a mixture of neutral, positive and significantly positive scores. There were 15 neutral scores and 11 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy T3 – Parking Provision	Policy T3 scored a mixture of neutral, positive and significantly positive scores. There were 15 neutral scores and 11 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy T4 – Electric Vehicle Charging Infrastructure	Policy T4 scored a mixture of neutral, positive and significantly positive scores. There were 20 neutral scores and 6 positive or significantly positive. IA7 (infrastructure) increases from positive in the short and medium term to significantly positive in the long term.	None. The HRA has screened the policy out.	None
Policy T5 – Vision-led Transport Statements, Assessments and Travel Plans in New Development	Policy T5 scored a mixture of neutral, positive and significantly positive scores. There were 12 neutral scores and 14 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
COMMUNITIES			
Policy CO1 -The Protection of Open Spaces, Sport and Recreation Provision	Policy CO1 scored a mixture of neutral, positive and significantly positive scores. There were 7 neutral scores and 19 positive or significantly positive scores.	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
	IA13 (climate change) increases from positive in the short and medium term to significantly positive in the long term.		
Policy CO2 - New and Improved Open Spaces, Sport and Recreation Provision	<p>Policy CO2 scored a mixture of neutral, positive and significantly positive scores. There were 7 neutral scores and 19 positive or significantly positive scores.</p> <p>IA13 (climate change) increases from positive in the short and medium term to significantly positive in the long term.</p>	None. The HRA has screened the policy out.	None
Policy CO3 - Community Facilities	Policy CO3 scored a mixture of neutral, positive and significantly positive scores. There were 11 neutral scores and 15 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy CO4 - Education and Skills	Policy CO4 scored a mixture of neutral, positive and significantly positive scores. There were 12 neutrals and 14 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy CO5 - Securing Educational Places through New Residential Development	Policy CO5 scored a mixture of neutral, positive and significantly positive scores. There were 21 neutral scores and 5 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy CO6 – New Development and Health	Policy CO6 scored a mixture of neutral, positive and significantly positive scores. There were 13	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
	neutral scores and 13 positive or significantly positive scores.		
Policy CO7 - Hot Food Takeaways and Fast-food outlets	Policy CO7 scored a mixture of neutral, positive and significantly positive scores. There were 20 neutral scores and 6 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
PROTECTING OUR LOCAL ENVIRONMENT			
Policy LE1 – Ensuring a High Standard of Amenity in New Development	<p>Policy LE1 scored a mixture of neutral, positive and significantly positive scores. There were 24 neutral scores and 2 positive or significantly positive scores.</p> <p>Effects increase from positive to significantly positive over time against IA8 (health) and IA15 (environmental quality).</p>	None. The HRA has screened the policy out.	None
Policy LE2 - Ground Conditions and Contaminated Land	<p>Policy LE2 scored a mixture of neutral, positive and significantly positive scores. There were 18 neutral scores and 8 positive or significantly positive scores.</p> <p>Effects increase from positive to significantly positive over time against IA18 (regeneration).</p>	None. The HRA has screened the policy out.	None
Policy LE3 - Air Quality	Policy LE3 scored a mixture of neutral, positive and significantly positive scores. There were 17 neutral scores and 9 positive or significantly positive scores.	None. The HRA has screened the policy out.	None

Policy	Scoring	Mitigation	Enhancement
	Effects increase from positive to significantly positive over time against IA7 (infrastructure).		
INFRASTRUCTURE AND DELIVERY			
Policy IN1 Digital Infrastructure and Telecommunications	Policy IN1 scored a mixture of neutral, positive and significantly positive scores. There were 19 neutral scores and 7 positive scores.	None. The HRA has screened the policy out.	None
Policy IN2 – Planning Obligations	Policy IN2 scored a mixture of neutral, positive and significantly positive scores. There were 5 neutral scores and 21 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
Policy IN3 - Delivering Social Value and Inclusion	Policy IN3 scored a mixture of neutral, positive and significantly positive scores. There were 19 neutral scores and 7 positive or significantly positive scores.	None. The HRA has screened the policy out.	None
MONITORING			
Policy M1 – Monitoring Framework	Policy M1 scored a mixture of neutral, and positive scores. There were 2 neutral scores and 24 positive scores.	None. The HRA has screened the policy out.	None

Difference the IA has made to the Publication Local Plan

- 4.15 Scoping Report Update 1, Update 2 and Update 3 all include details of the comments received on the previous Scoping Report and the Council's response to those comments and any amendments made.
- 4.16 The IA at Issues and Options Stage outlines what enhancements to maximise positive benefits were made to the vision, plan objectives 2 and 3 and the spatial option on employment allocations within the Issues and Options Report.
- 4.17 The IA process has considered options and reasonable alternatives (spatial options).
- 4.18 The options that were presented were in relation to policy areas and allocations and these were the reasonable alternatives to the approach taken in the Draft Local Plan. Comments received on the Issues and Options were taken into account when drafting the preferred policies. No other reasonable alternatives were proposed.
- 4.19 The Draft Plan was appraised by the IA framework and enhancements were made to plan objective 2 and policies H5 Homes for Disabled People, OTC2 Protecting and Enhancing Oldham Town Centre Conservation Area, CC2 Renewable and Low Carbon Energy and HE5 Canals.
- 4.20 Since the Draft Plan was published, the decision was taken to not include site allocations as the Oldham Local Plan has been amended to focus on development management policies that support PfE. The housing requirement and employment needs set out in PfE will be met through the borough's employment and housing land supply.
- 4.21 The Publication Plan therefore does not include site allocations. The IA framework has been used to assess the vision, plan objectives and plan policies. Enhancements were made to the Vision and OTC4 'Green Infrastructure within and around Oldham Town Centre' at Publication Plan stage.

Equalities Impact Assessment

- 4.22 The Equality Duty requires consideration of how different people will be affected by public sector activities, helping the sector to deliver policies and services which are efficient and effective; accessible to all; and which meet different people's needs.
- 4.23 The EIA process considers the effects of the Publication Plan on the following groups – Age; Disability; Gender reassignments; Marriage and civil partnership; Pregnancy and maternity; Race; Religion or belief; Sex; Sexual Orientation; and Care leavers.
- 4.24 For the purposes of assessing the Publication Plan the EIA is addressed through the Oldham Impact Assessment (OIA) tool. The OIA tool has been developed by Oldham Council and is used to assess the impact of relevant policies, programmes and decisions on the equalities characteristics, including Care leavers, as well as our corporate priorities.
- 4.25 The OIA concluded that there was no negative impact from the Publication Local Plan on the equality characteristics. There were strong positive impacts against Age and Disability and Moderate Positive against Care leavers.
- 4.26 The Plan also scored positively in relation to the council's Corporate Priorities on 'Green and Growing', 'A Great Place to Live' and 'Happier Healthier Lives'.

Health Impact Assessment

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

Habitat Regulations Assessment

- 4.30 A Habitats Regulations Assessment (HRA) has been prepared on the Publication Local Plan by the Greater Manchester Ecology Unit (GMEU). Through the Screening and Appropriate Assessment the HRA has assessed whether the Publication Plan needs to be amended to avoid harm to European sites or if a more detailed Assessment of impacts is required.
- 4.31 From the Screening process the following European sites have been screened in owing to proximity to Oldham or because there are pathways between Oldham and the designated sites:
- Manchester Mosses SAC (diffuse air pollution impacts)
 - Rochdale Canal SAC (direct and indirect impacts)
 - South Pennines Moors SAC/SPAs Parts 1 and 2 (direct and indirect impacts).

The findings of the 'Screening'

- 4.32 The first stage of the HRA is to carry out a Likely Significant Effect Test, otherwise known as Screening. This is essentially a risk assessment to decide whether a particular policy can be effectively 'screened out' from further, more detailed assessment, or if it needs to go forward for more detailed Assessment (and therefore 'screened in').
- 4.33 The Policies that have been 'Screened In' are:
- Policy H1: Delivering a Diverse and Sustainable Housing Offer;
 - Policy E1: Employment Floorspace Requirements;
 - Policy CC1: Renewable and Low Carbon Energy; and
 - Policy HE5: Canals

The findings of the 'Appropriate Assessment'

- 4.34 The Policies have been Screened In because they are considered to have some potential to cause effects through:
- direct habitat losses;
 - increased habitat and species disturbance;
 - increases in diffuse air pollution;
 - increases in diffuse water pollution;
 - increases in recreational pressures;
 - disturbance to functionally linked land;
 - visual and noise disturbance; and
 - introduction of invasive plant species.
- 4.35 These likely significant effects have therefore been considered as part of the Appropriate Assessment, with the following conclusions drawn:
- With regards to Air Quality:

- The air pollutants most likely to have a significant effect on European sites are the oxides of nitrogen (NOx) resulting from traffic emissions.
 - Manchester Mosses SAC, in particular Holcroft Moss, is considered to be sensitive to changes in air quality. Policy H1 and E1 were screened in as they promote economic growth and housing growth.
 - Air quality modelling was undertaken for PfE. This modelling concluded that developments within Greater Manchester (including Oldham) when acting in combination with developments in Warrington could cause LSE on Holcroft Moss by increasing emissions from traffic flow along the M62. In response to this mitigation for air quality impacts was proposed in the form of a Supplementary Planning Document “[Holcroft Moss Planning Obligations Joint Supplementary Planning Document – May 2025](#)¹” by the nine Places for Everyone authorities in consultation with Natural England.
 - This SPD provides guidance on when mitigation in the form of developer contributions to the positive management of the Manchester Mosses SAC will be required for Holcroft Moss as a result of additional vehicle movements along the M62 corridor past Holcroft Moss. (between junction 11 Birchwood and Junction 12 Worsley). The triggers are 100 vehicles or 20 HGV’s per day.
 - As Oldham has already adopted this SPD, alongside the other eight PfE authorities, and the Plan has already accounted for the quantum of development anticipated for Oldham up to 2039, it is reasonable to use the same criteria to assess housing and employment land supply / requirements under the Oldham Local Plan. Any development likely to increase traffic in excess of 100 vehicles or 20 HGV’s should there provide mitigation as agreed in the SPD.
 - Policies in the Publication Plan including Policies N1, N2 and LE3 will also act to protect European sites from air pollution effects.
- With regards to Recreational Pressure:
 - In relation to the South Pennine Moors SAC / SPA Natural England have stated that there is insufficient evidence to demonstrate that recreational activities are having any effect on the special interest of the South Pennine Moors designated sites.
 - In relation to the Manchester Mosses SAC and Rochdale Canal no LSEs will be caused by increased recreational development arising from development in Oldham.
- With regards to Water Quality:
 - In the case of the Rochdale Canal SAC policies N1, CC2 and CC3 will act to adequately mitigate for any possible harm to the Canal.
 - In the case of the South Pennine Moors, water flow is from the Moors down into more urban areas. There is no possibility of contaminated water flowing into the designated site from new developments, and currently no new development is planned for within the designated sites.

¹ The Holcroft Moss SPD is available at <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/joint-supplementary-planning-documents/holcroft-moss-planning-obligations-spd/adoption/>

- Policies N1, CC2 and CC3 will act to adequately mitigate for any possible harm which could arise from water pollution effects in any future developments.
- With regards to Direct Habitat Losses
 - No new significant development is planned within Oldham which could lead to direct habitat losses to European sites.
 - Should any development be proposed in future within designated sites leading to direct habitat losses, policies N1, CC2 and CC3 will act to adequately mitigate for any possible harm.
- With regards to Functionally Linked Land:
 - The South Pennine Moors SAC / SPA Joint SPD prepared and adopted by Oldham Council, Rochdale Council and Tameside Council in 2025 provides safeguards for developments within 2.5 km of the Moors and requires development within this area to carry out project-based surveys and assessments.
 - In addition, Policy JP-G5 (criterion 7) of the Places for Everyone Plan will act to mitigate effects on functionally linked land.
 - Local Plan Policy N1 will also serve to mitigate for any potential impacts on functionally linked land.
 - It is concluded that sufficient mitigation is in place to avoid any LSE on functionally linked land within Oldham.
- With regards to Habitat and Species Disturbance; Spread of invasive species; and Light Spillage and Shading:
 - These impacts which could affect plant communities in the Rochdale Canal SAC will be effectively mitigated by Policy N1.

Summary and Recommendations:

4.36 The HRA has screened in European designated sites which could be impacted by a number of screened in policies within the Oldham Local Plan: Publication Plan by different sources.

4.37 Mitigation for identified LSE is available, comprising –

- Holcroft Moss Planning Obligations Joint SPD;
- South Pennine Moors SAC/ SPA Joint SPD;
- Publication Plan policies N1, N2, N3, CC2, CC3 and LE3; and
- Places for Everyone policies including JP-G5 and JP-C8.

4.38 Following consideration of the available mitigation it has been concluded that, providing the available mitigation is applied appropriately, the operation of the Publication Plan will not have any effects on the integrity of any European designated sites.

4.39 It is recommended that if any changes are made to the policies in the Plan as a result of either the public consultation or during the Examination in Public, then the HRA will need to be revisited and revised to ensure that these changes would not result in effects on the integrity of any European designated sites.

- 4.40 It is recommended that any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA.

5 The conclusions of the Integrated Assessment

- 5.1 The IA has incorporated the SEA/SA requirements and also the EIA, HRA and HIA. Together these demonstrate that the Oldham Publication Plan results in many positive outcomes which should lead to a net gain in sustainability benefits.
- 5.2 Some enhancements as part of the IA process have been identified for the vision and Policy OTC4 'Green Infrastructure within and around Oldham Town Centre' at Publication Plan stage. Generally, however mitigation, where required, would be provided through PfE and other policies in the Local Plan. The Local Plan must be read as a whole.
- 5.3 The HRA has screened the Publication Plan and identified the mitigation already in place which if applied appropriately will ensure that the Oldham Local Plan will not have any effects on the integrity of any European designated sites.
- 5.4 The HRA has also recommended that any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA. Additional text has been added to Policy CC3.