

Oldham Local Plan

**Publication Plan: Achieving High Quality
Design Topic Paper**

January 2026



Contents

1. Introduction and Purpose.....	2
2. Relevant Policies, Plans and Strategies.....	3
National Context	3
Greater Manchester Context.....	6
Local Context	8
3. Issues, challenges and opportunities relating to Achieving High Quality Design.....	11
4. Achieving High Quality Design and the Oldham Local Plan: Publication Plan	12
Policy D1: Achieving High Quality Design.....	12
Policy D2: Advertisements, Signage and Shop Fronts	20
Policy D3: Creating a Better Public Realm in Oldham	22
Policy D4: Extensions and alterations to, and development within the curtilage of, a dwellinghouse	25
5. Conclusion	28

1. Introduction and Purpose

- 1.1. This is the Achieving High Quality Design Topic Paper and is one of 13 topic papers produced to inform the consultation on the Oldham Local Plan: Publication Plan.
- 1.2. All Topic Papers can be found online on [Oldham Council's website](#).¹
- 1.3. The main purpose of the Topic Paper is to set out:
 - the current key policies, plans and strategies relating to design that have informed the Local Plan;
 - the main issues and challenges relating to design that we face in Oldham, underpinned by proportionate and relevant evidence;
 - how policies within the Oldham Local Plan: Publication Plan have been shaped, having regard to:
 - the key issues and challenges facing the borough in relation to design;
 - responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions;
 - the outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment; and
 - how, with these policies, the Plan sets out an appropriate strategy that is based on proportionate evidence.
- 1.4. The Setting the Scene Topic Paper sets out the context for the Oldham Local Plan: Publication Plan, its purpose and how it relates to the Places for Everyone Joint Development Plan Document.
- 1.5. The Topic Papers therefore support and complement the Oldham Local Plan: Publication Plan, demonstrating how policy choices have been informed, providing transparency around decision-making, and assisting those viewing the plan and the examining Inspector in understanding the rationale behind the Plan's content.

¹ Oldham Council's website for Local Plan Review is available at https://www.oldham.gov.uk/info/201233/local_plan_review

2. Relevant Policies, Plans and Strategies

2.1. This section sets out the main policies, plans and strategies that relate to achieving high quality design and which have informed the policy approach taken.

National Context

National Planning Policy Framework

2.2 National Policy Framework (NPPF)² (December 2024, as amended February 2025) states that good design is a key aspect of sustainable development, that it creates better places in which to live and work and helps make development acceptable to communities. It goes on to say that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.

2.3 It goes on to say that planning policies and decisions should ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future user; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

2.4 It also states that the quality and character of places can suffer when advertisements are poorly sited and designed and that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

² This document can be found at:

https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

National Planning Practice Guidance – Design: process and tools

- 2.5 The [Planning Practice Guidance](https://www.gov.uk/guidance/design)³ (March 2014, as amended October 2019) sets out that well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process, from policy and plan formulation through to the determination of planning applications and the post approval stage.
- 2.6 It goes on to say that planning policies can set out the design outcomes that development should pursue as well as the tools and processes that are expected to be used to embed good design. It states that appropriate policies can be included within non-strategic policies in local plans.
- 2.7 It sets out the role of vision, objectives, strategic policies and non-strategic policies in achieving well-designed places and provides information as to what local design guides, masterplans and design codes are. It goes to list tools that are available to help assess and improve the design of development, including:
 - National Design Guide;
 - National Model Design Code;
 - Local design guides and codes;
 - Design review; and
 - Assessment frameworks.
- 2.8 In relation to design review, the PPG explains that it is an independent assessment of development proposals by a panel of multidisciplinary professionals and experts, which can inform and improve design quality in new development. It goes to say that effective design review is proportionate and can be used for both large and small-scale development, so long as the projects are significant enough to warrant the investment needed for a review and outlines a series of bullet points that explain what would constitute an effective design review.
- 2.9 It also discusses effective ways of engaging with local communities including through workshops, community panels and digital methods.

National Design Guide, Planning practice guidance for beautiful, enduring and successful places (MHCLG, 2019)

- 2.10. The [National Design Guide](https://www.gov.uk/government/publications/national-design-guide)⁴ is a planning practice guide from the Ministry for Housing Communities and Local Government (MHCLG). It builds on the NPPF and makes it clear that creating high quality buildings and places is fundamental to what the planning process should achieve. The focus of the guide is on good design in the planning system and it is aimed at local authority planning officers. The guide applies to all scales of development and new infrastructure.
- 2.11 The National Design Guide sets out 10 Characteristics of good design, listed below, and seen in the figure below.

³ This document can be found at: <https://www.gov.uk/guidance/design>

⁴ This document can be found at: <https://www.gov.uk/government/publications/national-design-guide>

Figure 1: MHCLG 10 Characteristics of Good Design



- Context – enhances the surroundings.
- Identity – attractive and distinctive.
- Built form – a coherent pattern of development.
- Movement – accessible and easy to move around.
- Nature – enhanced and optimised.
- Public spaces – safe, social and inclusive.
- Uses – mixed and integrated.
- Homes and buildings – functional, healthy and sustainable.
- Resources – efficient and resilient.
- Lifespan – made to last.

National Model Design Code (MHCLG, 2021)

2.12 The [National Model Design Code](#)⁵ sets a baseline standard of quality and practice which LPAs are expected to take into account when developing local design codes and guides and when determining planning applications, including:

- The layout of new development, including street pattern
- How landscaping should be approached including the importance of streets being tree-lined
- The factors to be considered when determining whether façades of buildings are of sufficiently high quality
- The environmental performance of place and buildings, ensuring they contribute to net zero targets
- That developments should clearly take account of local vernacular and heritage, architecture and materials.

Greater Manchester Context

Greater Manchester Strategy

2.13 The Greater Manchester Strategy⁶ published in July 2025 sets out a vision for the next decade is to see a thriving city region where everyone can live a good life. The strategy contains seven workstreams which, together, will fix the foundations in life, make Greater Manchester a greener and more equal city region, help grow our economy and make sure everyone can live well.

2.14 Workstream one 'Healthy homes for all' states that 'We'll build the kind of housing our residents need – from more single units for young people to more accessible housing which meets the needs of disabled residents and homes designed for all stages of the life course. This includes creating age-friendly developments, housing for those that need specialist care and support and creating more mainstream homes that have the features of inclusive design.

Places for Everyone (PfE)

2.15 [Places for Everyone](#)⁷ (PfE) Joint Development Plan Document (DPD), is a strategic plan that covers nine of the ten Greater Manchester districts - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Plan took effect and became part of the statutory development plan for each of the nine PfE authorities on 21 March 2024.

2.16 The most relevant PfE policy relating to design is:

Policy JP-P1 'Sustainable Places' states that we 'aim to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and

⁵ This document can be found at: <https://www.gov.uk/government/publications/national-model-design-code>

⁶ This document can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/greater-manchester-strategy/>

⁷ This document can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-adoption/>

varied places'. It sets out a number of attributes that development should be consistent with, including:

- Distinctive with a clear identity
- Visually stimulating
- Socially inclusive
- Resilient
- Adaptable
- Durable
- Resource Efficient
- Safe
- Supported by critical infrastructure
- Functional and convenient
- Inclusively designed
- Legible
- Easy to move around for those of all mobility levels
- Well-connected to other places
- Incorporating high quality and well managed green infrastructure and quality public realm
- Well-served by local shops, services and amenities

Streets for All, (TfGM, 2023)

2.17 [Streets for All](#)⁸ is Greater Manchester's approach to everything we do on our streets. It places a strong emphasis on reducing traffic and road danger, and on improving the street environment for everyone travelling along, spending time in, or living on them. It is a people-centred approach to street planning, design and network management and is needed to deliver the Bee Network, support growth and productivity and enable us to meet our decarbonisation targets.

2.18 In applying the Streets for All approach, the aim is to achieve:

- Green, vibrant streets that are welcoming and safe places to spend time in;
- An attractive and inclusive walking and wheeling environment;
- A safe and connected cycling experience;
- A reliable, integrated and accessible public transport network;
- A network where goods are delivered on time with minimal impacts on local communities;
- Streets that enable people to drive less; and
- A future proofed street network.

2.19 The approach seeks to celebrate the diversity of streets and places across Greater Manchester, each with its own context. It does not set out a street design template to be applied uniformly. Early engagement with local people, businesses and other interested groups is essential to what we call a 'context sensitive' approach.

⁸ This document can be found at: <https://tfgm.com/strategy/streets-for-all>

Local Context

2.20 A summary of the Oldham Partnership's Oldham Plan and the Council's Corporate Plan and how the Local Plan will help to deliver their missions and priorities is provided in the Setting the Scene Topic Paper. The sections below mainly focus on those parts of the plans relevant to Achieving High Quality Design.

The Oldham Plan

2.21 [The Oldham Plan 2024-2030, Pride, Progress and Partnership](#)⁹ outlines specific steps the Council will take over the next five years to improve education, boost the economy, enhance well-being, and create a greener environment. It sets out three clear missions to achieve by 2030 to deliver real improvements to the lives of Oldham people, Great Place to Live Healthier, Happier Lives and Green and Growing.

2.22 The Great Place to Live mission is the most relevant for this topic paper. It is about building on the pride our residents have by providing more affordable, quality homes, improving public spaces, and creating a strong local economy with vibrant communities that get on well. The relevant objectives are that:

- More people will have access to good, affordable homes that suit their needs.
- Residents will feel proud of where they live and more connected to their community.
- Our neighbourhoods will be safer, more welcoming, and better connected

Oldham Council Corporate Plan

2.23 [Oldham Council's Corporate Plan \(2024-2027\), Ready for the Future](#)¹⁰, builds on the Oldham Plan and is focused on the same three goals – Healthier, Happier Lives, Great Place to Live and Green and Growing. The aim is that by fostering innovation, investing in people, and supporting our communities, we'll ensure Oldham remains a place where everyone can thrive. With strong leadership, commitment to our values, and ongoing improvement, we're ready to adapt to the changes in local government.

2.24 There are four main focus areas that guide this plan and will help to achieve the goals:

- Efficiency and value for money
- Capacity building
- Digital
- Prevention and early help

2.25 Relevant to this design topic paper, the Plan sets out that, by 2027:

- Our neighbourhoods will be places where residents are proud to live, and work with us to keep them clean and green.

⁹ This document can be found at:

https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan

¹⁰ This document can be found at:

https://www.oldham.gov.uk/info/200146/strategies_plans_and_policies/2888/corporate_plan

- There will be more homes of a great standard, that are affordable for all local people.

Building a Better Oldham

2.26 [Building a Better Oldham](#)¹¹ is the Council's ambitious transformation programme for the borough. It will unlock investment worth £285 million and create more than 2,000 new homes in Oldham town centre, 1,000 new jobs and 100 apprenticeship opportunities.

2.27 The vision of the programme is to create a town centre with character, with thousands of new homes and an emphasis on sustainability, community and quality – an inclusive and welcoming place to live and spend time in. A town centre that acknowledges Oldham's industrial heritage while looking towards a bright, modern future. With homes built in a safer and healthier environment and where we prioritise local jobs and learning opportunities for Oldham residents.

2.28 The element set out in the [Oldham Town Centre Development Framework](#)¹² 2024 in relation to design is that the document sets out a series of Town Centre Design Principles. The principles are expected to form part of any development proposals for Oldham Town Centre and are as follows:

- Promoting High Quality Contextual Design
- Increasing Digital Connection
- Achieving Net Zero Carbon
- Creating New and Enhanced Green Infrastructure
- Enhancing Oldham's Historic Character
- Encouraging Active Streetscenes
- Improving Inclusivity and Accessibility
- Improving Public Realm and Sustainable Connections

2.29 In addition, another key proposal set out in Development Framework is in relation to the public realm and enhancing accessibility, connectivity and movement, providing sustainable infrastructure connections through the Accessible Oldham programme.

2.30 Accessible Oldham is a scheme which is transforming streets around Oldham, by improving roads, footpaths and public areas. The scheme will make a huge difference to the look and feel of Oldham Town Centre and complement the wider regeneration works.

Oldham Transport Strategy and Delivery Plan

2.31 The [Oldham Transport Strategy and Delivery Plan](#)¹³ (November 2022), supports the aims of the Greater Manchester Transport Strategy 2040 to have 'World-class connections that support long-term sustainable economic growth and access to opportunity for all' and can deliver real benefits for our residents and the borough.

2.32 It includes the following success criteria within its monitoring framework:

¹¹ More information can be found at:

https://www.oldham.gov.uk/info/201248/building_a_better_oldham

¹² This document can be found at: <https://oldhamtownliving.co.uk/vision/>

¹³ This document can be found at:

https://www.oldham.gov.uk/downloads/download/2214/oldham_transport_strategy_and_delivery_plan

- Higher standards of public realm, cycle parking and facilities; and
- Improved public realm, lighting, information provision.

2.33 It also states that safety in design will be used to improve transport and public realm areas in Oldham Town Centre, local district centres and the wider network and that the design of good public realm and improvements to transport interchanges are an opportunity to ensure adequate lighting and visibility features in the solutions.

3. Issues, challenges and opportunities relating to Achieving High Quality Design

3.1 This section summarises the main issues, challenges and opportunities relating to design that we face in Oldham, underpinned by proportionate and relevant evidence.

There is a need to promote high quality design

3.2 The Integrated Assessment identified that there is a need to promote high quality design.

3.3 The overarching purpose of the planning system, as set out in NPPF, is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. It goes on to set out the three overarching objectives that the planning system has in achieving this and one of those objectives is a ‘social objective’ which is, ‘to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being’.

3.4 In 2020, a [Housing Design Audit for England](#)¹⁴ was launched by Place Alliance to provide a systemic approach to assess the design quality of the external residential environment to improve placemaking and enhance the potential for internalisation of trips. It scored new housing developments across England on a variety of metrics under the following broad categories:

- Environment and Community;
- Place Character;
- Streets, Parking and Pedestrian Experience; and
- Detailed Design and Management.

3.5 These were then subdivided into a greater number of metrics. The report found that generally the Northwest region, where Oldham is located, was delivering poor places below the national average. The report states that ‘poor’ and even ‘mediocre’ design is not sustainable and falls foul of the NPPF’s ‘Presumption in favour of sustainable development’.

3.6 The report stated five recommendations for local authorities to achieve high quality design, which should be taken into account by the Local Plan:

- Set very clear aspirations for sites (in advance);
- Design review for all major housing schemes;
- Deal once and for all with the highways / planning disconnect;
- Refuse sub-standard schemes on design grounds; and
- Consider the parts and the whole when delivering quality.

¹⁴ This document can be found at: <https://indd.adobe.com/view/23366ae1-8f97-455d-896a-1a9934689cd8>

4. Achieving High Quality Design and the Oldham Local Plan: Publication Plan

- 4.1 This section of the Topic Paper looks at each of the policies contained in the Achieving High Quality Design chapter of the Oldham Local Plan: Publication Plan.
- 4.2 For each policy the Topic Paper shows how policies within the Oldham Local Plan: Publication Plan have been shaped to provide an appropriate strategy for the borough that is based on proportionate evidence and having regard to:
 - The key issues, challenges and opportunities facing the borough in relation to design;
 - Responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions; and
 - The outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment.

Policy D1: Achieving High Quality Design

Summary of evidence

- 4.3 As set out in NPPF, the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It goes on to say that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.4 The National Design Guide builds upon this stating that well-designed places influence the quality of our experience as we spend time in them and move around them. It states that they can lift our spirits by making us feel at home, giving us a buzz of excitement or creating a sense of delight. They have been shown to affect our health and well-being, our feelings of safety, security, inclusion and belonging, and our sense of community cohesion.
- 4.5 It also states that well-designed places are:
 - based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
 - integrated into their surroundings so they relate well to them;
 - influenced by and influence their context positively; and
 - responsive to local history, culture and heritage.
- 4.6 PfE states that helping to ensure that Greater Manchester can deliver the attractive places that will enable it to compete successfully with other major cities across the world. It also says that small design changes can make a considerable difference to the overall quality of a development, and the contribution that it makes to the success of a place. It also states that all development should achieve a high design quality, consistent with the ten characteristics set out in the National Design Guide.

Draft Local Plan consultation and Duty to Co-operate

- 4.7 At Draft Plan stage there were seven policies that made up the 'Creating a Better and Beautiful Oldham'. This chapter is now called 'Achieving High Quality Design' and is made up of four policies. On reflection it was felt that there were elements of repetition and overlap with some of the Draft Local Plan policies and therefore Draft

Local Plan Policies D2 'A Design Led Approach to Non-Residential, Commercial and Employment Developments', D3 'Design Scrutiny' and D4 'Creating Better Views, Gateways and Taller Buildings' have been deleted and key points from them have instead been included within Policy D1 'Achieving High Quality Design'.

4.8 Therefore this section will set out the comments received and the Council's response to those comments for Draft Local Plan polices D1 – D4.

4.9 Policy D1 'A Design-Led Approach for Residential & Residential-Led Mixed-Use Development' received general comments of support from Historic England, National Highways and a number of planning agents and developers. The table below sets out comments received and any amendments that were requested in relation to Policy D1 and the Council's response.

Table 1: Summary of comments received and the Council's response to Policy D1

Respondent	Summary of Comment	Council Response
NHS Property Services	Supports the inclusion of a design standard for new developments but recommend the inclusion of the principles of healthy design to ensure new developments also promote healthier lifestyles and overall, improve health and wellbeing of the local community. Recommend the inclusion of a comprehensive policy on health and wellbeing in the Local Plan and encourage the council to engage with the NHS on this matter.	Comment noted. Policy D1 amended to include a criterion that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy CO6 'New Development and Health' has been rewritten and now includes details on circumstances when new health facilities will be supported and where the loss of health facilities will be supported.
National Gas Transmission (Avison Young)	To ensure this policy is consistent with national policy we would request the inclusion of a policy bullet point that references site constraints such as utilities.	Comment noted. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through their design: adopt a comprehensive and co-ordinated approach to development, respecting existing site constraints including utilities situated within, and running through, the site'.
Canal and River Trust	Existing walking and cycling routes, including our towpaths, should be integrated into the wider active travel network. Within part 2 of the policy, consider that the policy could be made more effective by referring to integrating existing routes into new development.	Comment noted. Criteria two of the policy states that development proposals should through their design, 'encourage and facilitate active travel with convenient, safe and inclusive pedestrian and cycling routes', this will include canal towpaths.
National Grid (Avison Young)	To ensure this policy is consistent with national policy we would request the inclusion of a policy bullet point	Comment noted. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through

Respondent	Summary of Comment	Council Response
	that references site constraints such as utilities.	their design: adopt a comprehensive and co-ordinated approach to development, respecting existing site constraints including utilities situated within, and running through, the site'.
Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles.	Comment noted. Policy D1 amended to include a criterion that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also refers to Sport England's Active Design principles and the Local Plan should be read as a whole.
Lancashire Wildlife Trust	Agree with and support a place-making guide and design code, suggest including reference the Building with Nature project. Support the policy.	Support noted. Building with Nature project referenced in Reasoned Justification.
United Utilities	Recommend some suggested wording for inclusion within the policy on development proposals linking to opportunities to manage surface water and reduce flood risk.	Comment noted. Suggested wording has not been included as opportunities for managing surface water and reducing flood risk are covered by Local Plan Policies CC2 and CC3. The Local Plan should be read as a whole.
TfGM	Support the policy, paragraph 17.15 states "The design and layout of development should reduce the dominance of cars" yet there is nothing specifically in policy D1 to help achieve this.	Comment noted. Criterion two of the policy states that development proposals should through their design, 'encourage and facilitate active travel with convenient, safe and inclusive pedestrian and cycling routes'. In addition, the Local Plan should be read as a whole and the 'A Sustainable, Active, Accessible Network for Oldham' chapter includes policies that will help to reduce the dominance of cars.

4.10 Policy D2 'A Design Led Approach to Non-Residential, Commercial and Employment Developments' received general comments of support from Historic England, Lancashire Wildlife Trust, National Highways, TfGM and a planning agent. The table below sets out comments received and any amendments that were requested in relation to Policy D2 and the Council's response.

Table 2: Summary of comments received and the Council's response to Policy D2

Respondent	Summary of Comment	Council Response
National Gas Transmission (Avison Young)	To ensure this policy is consistent with national policy we would request the inclusion of a policy bullet point that references site constraints such as utilities.	Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through their design: adopt a comprehensive and co-ordinated approach to development, respecting existing site constraints including utilities situated within, and running through, the site'.
National Grid (Avison Young)	To ensure this policy is consistent with national policy we would request the inclusion of a policy bullet point that references site constraints such as utilities.	Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through their design: adopt a comprehensive and co-ordinated approach to development, respecting existing site constraints including utilities situated within, and running through, the site'.
Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles.	Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Policy D1 has been amended to include a criterion that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also refers to Sport England's Active Design principles and the Local Plan should be read as a whole.
United Utilities	Recommend some suggested wording for inclusion within the policy on development proposals linking to opportunities to manage surface water and reduce flood risk.	Comment noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Suggested wording has not been included as opportunities for managing surface water and reducing flood risk are covered by Local Plan Policies CC2 and CC3. The Local Plan should be read as a whole.
Lichfields on behalf of Russell LPD	This policy requirement should not be placed on the strategic employment allocations which have been released through the PfE. A requirement to reduce the scale of bulky buildings on a strategic allocation is fundamentally flawed and will	Comment noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. The requirement to reduce the scale of bulky buildings and bland elevations by breaking down building mass has been deleted.

Respondent	Summary of Comment	Council Response
	<p>compromise the future delivery of the site. The massing of large-scale buildings can be broken down through appropriate design related mitigation, but this should suffice rather than reducing the scale of the building itself.</p> <p>Recommend that part 3 of Policy D2 is deleted, or its explanatory text should clarify that this part of the policy does not apply to strategic PfE allocations such as Stakehill.</p>	

4.11 Policy D3 'Design Scrutiny' received general comments of support from Lancashire Wildlife Trust, TfGM and a planning agent and a developer. The table below sets out comments received and any amendments that were requested in relation to D3 and the Council's response.

Table 3: Summary of comments received and the Council's response to Policy D3

Respondent	Summary of Comment	Council Response
Historic England	<p>Support the principles of this policy but it is unclear what a 'major development in a conservation area' is and how this is defined. This needs to be clarified and amended as it is not clear how this policy should be applied.</p>	<p>Support noted. Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.' Reference to 'major development' is no longer included.</p>
Countryside Partnership / Vistry Group	<p>Supportive of the use of Design Review in general, however it is important that this tool is used appropriately and in a proportionate manner. Design Review can be a tool to promote good design and an efficient way to improve quality. However, they need to be well managed. It is important that Design Review is undertaken at the right time, and that feedback provided is constructive and sufficiently detailed, and an appropriate planning balance is sought to ensure that all policy requirements can be met not just those in relation to design, and to ensure that the applicant is fully engaged in the process.</p>	<p>Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.' This will allow for design reviews to be carried out appropriately and proportionately.</p>

Respondent	Summary of Comment	Council Response
Home Builders Federation	Generally supportive of the use of Design Review, but it will be important that this tool is used appropriately and in a proportionate manner. It will be important that any design review is undertaken at the right time, that any feedback provided is constructive and sufficiently detailed, that an appropriate planning balance is sought to ensure that all policy requirements can be met not just those in relation to design, and to ensure that the applicant is fully engaged in the process.	Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.' This will allow for design reviews to be carried out appropriately and proportionately.
Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles.	Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Policy D1 has been amended to include a criterion that says, 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also refers to Sport England's Active Design principles and the Local Plan should be read as a whole.

4.12 Policy D4 'Creating Better Views, Gateways and Taller Buildings' received general comments of support from National Highways, TfGM and a planning agent. The table below sets out comments received and any amendments that were requested in relation to D4 and the Council's response.

Table 4: Summary of comments received and the Council's response to Policy D4

Respondent	Summary of Comment	Council Response
Historic England	Objects to Policy D4 as written. The policy appears to be a mix of location and written expectations for planning permission for taller buildings, views and gateway buildings. There are a number of questions which the council needs to consider for this policy: Is there a need for the policy that is not covered by the rest of the Plan? Has the council commissioned tall building, gateway and view work to support the policy? If not, how can the policy suggest locations that are appropriate for such proposals? How can this policy suggest suitable locations that are not within the	Comment noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted. Policy D1 has been amended to include three criteria concerned with what development proposals involving tall buildings are required to demonstrate rather than stipulating where they should be located.

Respondent	Summary of Comment	Council Response
	<p>allocations? What is 'sympathetic' development? If the policy is to be maintained, then it should be strictly about what needs to be submitted with an application not about where the appropriate development can take place – which is untested.</p>	
Canal and River Trust	<p>Tall buildings in proximity to our waterways can result in shading issues, which can result in harm to the user experience along our network, and also could impact the biodiversity or our canals. This is pertinent in Oldham, where our canals benefit from SAC and SSSI designations.</p> <p>The policy text should refer to an assessment of shading effects on the wider environment, including over waterspaces, to help ensure that this matter is fully assessed and taken into account by decision makers and applicants.</p>	<p>Comment noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted. Policy D1 has been amended to include three criteria concerned with what development proposals involving tall buildings are required to demonstrate including that they should, 'not unduly affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing and shading, noise, reflected glare, aviation, navigation and telecommunication interference'.</p>
Manchester Airport	<p>Attention should be drawn to the potential for tall buildings to cause an air navigation obstacle or interference to radar and other navigation aids. Certain tall building proposals will require specialist technical safeguarding assessments to determine whether the proposal would have any impact upon aircraft operations and air traffic control procedures. In accordance with Circular 1/2003, proposals for tall buildings that exceed the height indicated on Manchester Airport's Safeguarding Map, must be referred to the Airport as statutory consultee. Advise inserting additional text to state that tall building proposals that adversely impact on aircraft safety will not be permitted.</p>	<p>Comment noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted. Policy D1 has been amended to include three criteria concerned with what development proposals involving tall buildings are required to demonstrate including that they should, 'not unduly affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing and shading, noise, reflected glare, aviation, navigation and telecommunication interference'.</p>
Sport England	<p>Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles.</p>	<p>Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Policy D1 has been amended to include a criterion that says, 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In</p>

Respondent	Summary of Comment	Council Response
		<p>addition, Policy T1 also refers to Sport England's Active Design principles and the Local Plan should be read as a whole.</p>

- 4.13 A detailed summary of the responses received can be found at in the Schedule of Comments and the Council's Response document.
- 4.14 Oldham Council met with Historic England on 1 July 2025, and United Utilities, National Highways and TfGM on 9 July 2025 to discuss the amendments that had been made, all parties were satisfied with the amendments on Policy D1.

Policy Approach

- 4.15 As the evidence and policy context has shown, the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Well-designed places can influence the quality of our experience, lift our spirits, affect our health and well-being, our feelings of safety, security, inclusion and belonging, and our sense of community cohesion.
- 4.16 Policy D1, 'Achieving High Quality Design', seeks to reflect the ten characteristics set out in the National Design Guide and establish some of the key principles against which the design and layout of all new development will be considered. It states that all development is required to achieve a high standard of design, consistent with local design guides or design codes where available and that developments that are of a poor standard of design will be refused.
- 4.17 Policy D1 sets out 13 criteria that new development should meet through their design. It then goes on to list three criteria that development in relation to tall buildings should also meet. (Tall buildings are defined in the Reasoned Justification as any building that is significantly taller than its surroundings and/or any building of five storey's or more).
- 4.18 It goes on to say that any strategic developments should be supported by a design-led masterplan or framework and that any developments that raise significant design issues will be expected, where appropriate, to undergo a local design review.
- 4.19 The Reasoned Justification reiterates the benefits of high-quality design, lists a number of guidance documents that applicants may wish to consider referring to as they prepare their Design and Access Statements and provides information on where to find further information on design reviews.

Integrated Assessment

- 4.20 Policy D1 scored a mixture of significantly positives, positives and neutrals. No mitigation or enhancements to the policy were made as a result of the IA.
- 4.21 In terms of the HRA the policy has been screened out, there is no likely significant effect on any European Site anticipated from the operation of this Policy.

Policy D2: Advertisements, Signage and Shop Fronts

Summary of evidence

4.22 NPPF states that the quality and character of places can suffer when advertisements are poorly sited and designed and that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

4.23 [The Oldham Town Centre Conservation Area Appraisal and Management Plan \(CAAMP\) Supplementary Planning Document](#)¹⁵ was adopted in August 2019. The Management Plan followed on from the appraisal of the conservation area. It sets out policies and recommendations around enhancement.

4.24 The Management Plan recommends the Council:

- Improve signage and shopfronts in the Town Centre.

4.25 It is considered that this approach can be replicated across the borough and in other conservation areas in Oldham.

4.26 In addition, Oldham Council has received funding from GMCA for The Shop Front Improvement Grant Scheme. This will allow the Council to award local businesses grants to improve their shop fronts. The scheme aims to improve the overall experience for visitors and shoppers and should help to create a more welcoming and engaging town centre.

Draft Local Plan consultation and Duty to Co-operate

4.27 At Draft Local Plan stage this policy was called Policy D5 'Improving the Quality of Advertisements and Signage in Oldham'. It received general comments of support from Historic England and TfGM. Sport England requested reference to Active Design Guide be added. This amendment was not made, instead Policy D1 was amended to include a criterion that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design', and in addition, Policy T1 also makes reference to Sport England's Active Design principles.

Policy Approach

4.28 National planning policy sets out that the quality and character of places can suffer when advertisements are poorly sited and designed.

4.29 Policy D2 'Advertisements, Signage and Shop Fronts', sets out the circumstances when the Council will support new advertisements and signage. It lists six criteria related to amenity and safety that the advertisement and signage should achieve.

4.30 The policy also includes a section on shop fronts stating that when determining planning applications, the Council will have regard to whether a proposal contributes positively to the visual appearance of the area during opening and non-opening hours. It lists five considerations that will be taking into account in relation to

¹⁵ This document can be viewed at:

https://www.oldham.gov.uk/downloads/download/1599/oldham_town_centre_conservation_area_appraisal_and_management_plan_caamp_supplementary_planning_document_spd

applications for shop fronts. It also states that any applications affecting heritage assets or conservation areas should comply with Local Plan policies HE2 and HE3 respectively.

4.31 The Reasoned Justification emphasises the importance of shop fronts in that they can attract the attention of customers in order to help ensure economic success and secondly, they can improve the appearance and attractiveness of our shopping streets and our centres. It goes on to explain that the policy aims to set clear criteria to enable adverts to be placed in the right places without detriment to the amenity of the surrounding area and whilst protecting character and appearance, as well as public and highway safety.

Integrated Assessment

4.32 Policy D2 scored a mixture of significantly positives, positives and neutrals. No mitigation or enhancements to the policy were made as a result of the IA.

4.33 In terms of the HRA the policy has been screened out, there is no likely significant effect on any European Site anticipated from the operation of this Policy.

Policy D3: Creating a Better Public Realm in Oldham

Summary of evidence

4.34 There are many benefits to improving the borough's public realm. The [Oldham Transport Strategy and Delivery](#)¹⁶ Plan includes the following success criteria within its monitoring framework:

- Higher standards of public realm, cycle parking and facilities; and
- Improved public realm, lighting, information provision.

4.35 It also states that safety in design will be used to improve transport and public realm areas in Oldham Town Centre, local district centres and the wider network and that the design of good public realm and improvements to transport interchanges are an opportunity to ensure adequate lighting and visibility features in the solutions.

4.36 One of the design principles in the [Oldham Town Centre Development Framework](#)¹⁵ is 'Improving Public Realm and Sustainable Connections'. It states that ensuring that sustainable infrastructure connections and high-quality public realm is achieved to connect development opportunities to the wider town and help to define and enhance the local character and sense of place.

4.37 In addition, Greater Manchester's [Streets for All](#)¹⁷ explains how the design and management of streets can support a wide range of activities in the public realm as well as encourage and facilitate a shift to active travel.

Draft Local Plan consultation and Duty to Co-operate

4.38 At Draft Local Plan stage this policy (numbered as Policy D6) received four comments as set out below.

Table 5: Summary of comments received and the Council's response to Policy D6

Respondent	Summary of Comment	Council Response
Natural England	Natural England support the preference for active and public transport. Transport proposals, including walking and cycling, should link with policies on Green Infrastructure and ecological networks to support access to nature. Transport proposals offer opportunities to create new habitats/connect habitats, e.g., railway embankments and highway verges.	Comment noted. The policy has been amended to include the following two criteria, 'Development proposals that include the creation of new public realm should, where applicable: support biodiversity, and integrate green infrastructure and surface water management in line with Policy N3; and prioritise active travel through providing safe, legible and well-connected routes whilst discouraging travel by car and excessive on-street car parking'.
Lancashire Wildlife Trust	Support the preference for active and public transport. Transport proposals, including walking and cycling, should link with policies on Green Infrastructure and ecological	Comment noted. The policy has been amended to include the following two criteria, 'Development proposals that include the creation of new public

¹⁶ This document can be found at:

https://www.oldham.gov.uk/info/201058/transport_parking_and_travel/3030/transport_strategy

¹⁷ This can be found at: <https://tfgm.com/strategy/streets-for-all>

Respondent	Summary of Comment	Council Response
	networks to support access to nature. Transport proposals offer opportunities to create new habitats/connect habitats, e.g., railway embankments and highway verges.	realm should, where applicable: support biodiversity, and integrate green infrastructure and surface water management in line with Policy N3; and prioritise active travel through providing safe, legible and well-connected routes whilst discouraging travel by car and excessive on-street car parking'.
United Utilities	Request policy wording is included regarding new public realm and surface water management.	Comment noted. The policy has been amended to include a criterion that says, 'Development proposals that include the creation of new public realm should, where applicable: support biodiversity, and integrate green infrastructure and surface water management in line with Policy N3'.
TfGM	Support the policy, paragraph 17.44 could refer to the Street for All Design Guidance and also LTN1/20 for cycle infrastructure design.	Support noted. Streets for All is referenced in the Reasoned Justification.

4.39 A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.

4.40 Oldham Council met with United Utilities and TfGM on 9 July 2025 and Natural England on 11 July 2025 to discuss the amendments that had been made to the Local Plan based on comments they had submitted.

Policy Approach

4.41 As the evidence and policy context has shown, there are many benefits to improving the borough's public realm. It can help define and enhance the local character and sense of place and support a wide range of activities, as well as encourage and facilitate a shift to active travel.

4.42 Policy D3, 'Creating a Better Public Realm in Oldham', sets out nine criteria that development proposals that include the creation of public realm should meet where applicable. These range from relating to the local and historic context, ensuring the public realm is inclusive and fully accessible, creating a sense of place and supporting biodiversity.

4.43 The Reasoned Justification goes on to explain that places should be distinctive, attractive and of the highest quality, allowing people to meet, congregate and socialise, as well as providing opportunity for quiet enjoyment. It also states that the effective management and ongoing maintenance of public realm should be a key consideration in its design and secured through the planning system where appropriate.

Integrated Assessment

- 4.44 Policy D3 scored a mixture of significantly positives, positives and neutrals. No mitigation or enhancements to the policy were made as a result of the IA.
- 4.45 In terms of the HRA the policy has been screened out, there is no likely significant effect on any European Site anticipated from the operation of this Policy.

Policy D4: Extensions and alterations to, and development within the curtilage of, a dwellinghouse

Summary of evidence

4.46 Extending a home to suit the residents present and future needs can be a more economical solution than moving to a new house. In seeking to meet these needs care must be taken to ensure the extension is designed and built well. Extensions must not have an adverse effect on the house itself, the immediate neighbours or the quality of a streetscape and neighbourhood.

4.47 Some extensions do not require planning permission. This is known as 'Permitted Development.' However, there are certain types of permitted development that require 'prior approval' from the Local Planning Authority before work can start. This is explained in more detail through the [Permitted development rights for householders: technical guidance document](#)¹⁸. The guidance sets out that it is important that homeowners understand how they can exercise their rights to carry out development while protecting the interests of their neighbours and the wider environment.

Draft Local Plan consultation and Duty to Co-operate

4.48 At Draft Local Plan stage this policy was Policy D7 'Development within the curtilage of a dwellinghouse'. It received general support from TfGM and three other comments as set out below.

Table 6: Summary of comments received and the Council's response to Policy D7

Respondent	Summary of Comment	Council's Response
Historic England	It is not the value of a heritage asset rather its significance that should be considered. Therefore 'value' should be replaced with 'significance'.	Comment noted. The policy has been amended since Draft Local Plan and the criterion relating to heritage assets has been removed.
United Utilities	Request that this policy includes an additional criterion regarding the implementation of sustainable surface water management. This is critical to minimise the impacts of urban creep on existing drainage systems.	Comment noted. The policy has been amended to include a criterion and says extension or alteration to an existing dwelling, or the construction of an ancillary outbuilding, structure, boundary treatment or hardstanding within the residential curtilage, will be supported where: 'there is the implementation of sustainable surface water management by directing surface water to a permeable surface or an infiltration system wherever possible'.
Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see	Support noted. Amendment not made to this policy. Policy D1 has been amended to include a criterion that says, 'Development proposals, where

¹⁸ This document can be found at: <https://www.gov.uk/government/publications/permitted-development-rights-for-householders-technical-guidance>

Respondent	Summary of Comment	Council's Response
	<p>reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles. The policies should include requirements for development that will create active environments – currently this is not promoted other than D6 which incorporates some elements of Active Design.</p>	<p>applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also refers to Sport England's Active Design principles, and the Local Plan should be read as a whole.</p>

4.49 A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.

4.50 Oldham Council met with Historic England on 1 July 2025, and United Utilities, on 9 July 2025 to discuss the comments submitted and any amendments that had been made.

Policy Approach

4.51 As the evidence and policy context has shown it is important that when homeowners are carrying out development to their properties, that the interests of neighbours and the wider environment are protected.

4.52 Policy D4 'Extensions and alterations to, and development within the curtilage of, a dwellinghouse', is focused on ensuring that extensions or alterations to an existing dwelling, or development within the curtilage of a residential property (such as ancillary outbuilding, structure, boundary treatment or hardstanding) is in keeping with the character and appearance of the original dwelling and surrounding property / area, without having a detrimental impact on amenity.

4.53 The policy sets out criteria that applications for developments for extensions and alterations to, and within the curtilage of, a dwellinghouse, will be supported. It includes criteria such as the extension / alteration being in keeping with the character and appearance of, and is subordinate to, the original dwelling and surrounding properties, that there is suitable provision for access, parking, waste and recycling and amenity space, and that there is implementation of sustainable surface water management.

4.54 It states that proposals within the Green Belt will need to meet Policies OL2 and OL3 and proposals within a Local Green Space will need to meet Policy OL4.

4.55 The Reasoned Justification states that as a general guide:

- subordinate and small-scale extensions/outbuildings are less likely to be approved where they would increase the size of the original dwelling by more than 40% (notwithstanding permitted development rights); and
- replacement dwellings are less likely to be approved where they are significantly larger (i.e. more than 40%) than the existing dwelling.

4.56 It further clarifies that the increase in size of the original or existing dwelling will generally be determined by assessing the net increase in floorspace (measured externally).

Integrated Assessment

4.57 Policy D4 scored a mixture of significantly positives, positives and neutrals. No mitigation or enhancements were required as a result of the IA.

4.58 In terms of the HRA the policy has been screened out, there is no likely significant effect on any European Site anticipated from the operation of this Policy.

Monitoring

4.59 Policies D1 to D4 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1. The Local Plan indicators that will be used to monitor these policies are:

- Number of major developments refused on landscape grounds
- Number of approved applications for strategic developments with a masterplan or framework and design code

4.60 Policy M1 of the Local Plan sets out, that where monitoring identifies underperformance or unintended outcomes:

- Further supporting guidance on the relevant policy matter may be produced.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.61 The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policies D1 to D4.

5. Conclusion

Providing an appropriate strategy

5.1 Policies D1 to D4 of the Oldham Local Plan: Publication Plan provide the policy framework for ensuring that we are achieving a high-quality design standard for new developments in Oldham.

5.2 In terms of the test of soundness listed at paragraph 36 of NPPF it is considered that these have been met as follows:

- a) **Positively prepared:** the Oldham Local Plan: Publication Plan supports the delivery of PfE which provides the strategic direction and context for the borough. PfE includes Policy JP-P1 Sustainable Places that sets out that we aim to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places. It sets a clear framework with key attributes that new development should be consistent with. The design policies in the Local Plan complement JP-P1 and have been formulated to deliver high-quality, inclusive and sustainable places by ensuring that new development reflects local character, supports climate resilience, and promotes health, wellbeing and accessibility. The policies provide clear guidance that enables applicants to understand expectations at an early stage.
- b) **Justified:** the Oldham Local Plan: Publication Plan supports the delivery of PfE which provides the strategic direction and context for the borough. PfE includes Policy JP-P1 Sustainable Places that sets out that we aim to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places. It sets a clear framework with key attributes that new development should be consistent with. The design policies in the Local Plan complement JP-P1 as they set out a more detailed policy framework for Oldham in relation to design and have been informed by consultation feedback and prepared with the objective of contributing to the achievement of sustainable development.
- c) **Effective:** the Oldham Local Plan: Publication Plan supports the delivery of PfE which provides the strategic direction and context for the borough. PfE includes Policy JP-P1 Sustainable Places that sets out that we aim to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places. It sets a clear framework with key attributes that new development should be consistent with. Policies D1 to D4 are effective because they provide clear requirements that can be understood and applied by applicants, decision-makers and the wider community. Finally, deliverability of the Oldham Local Plan: Publication Plan is also evidenced by the Infrastructure Delivery Plan and Statement of Common Ground.
- d) **Consistent with national policy:** policies D1 to D4 support the NPPF's wider objectives for sustainable development and good placemaking and they reflect the principles and requirements set out in Chapter 12 'Achieving Well-Designed Places'. By translating these national priorities into locally specific, implementable

policy, the design policies ensure full compliance with national planning policy and contribute to the delivery of well-designed places across Oldham.

- 5.3 Furthermore, policies D1 to D4 are considered an appropriate strategy for Oldham as they contribute towards delivering the Local Plan's vision and plan objectives, and the Oldham Plan missions. The policies will support the Local Plan vision of ensuring that new development in Oldham is in line with co-design expectations and design codes developed with Oldham's communities, whilst the key characteristics of Oldham's townscape and landscape type.
- 5.4 The policies will also support Plan Objective 9 'Improving and valuing a better historic and built environment, by delivering high-quality design and placing greater emphasis on place-making, with buildings and spaces that respond positively to local distinctiveness and character'.
- 5.5 Policies D1 to D4 will also support The Oldham Plan's vision for the future which includes Oldham becoming a place where we have provided more affordable, quality homes, improved public spaces, and created a strong local economy with vibrant communities that get on well.