

Oldham Local Plan

**Publication Plan: Historic Environment
Topic Paper**

January 2026



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1. Introduction and Purpose

- 1.1. This is the Oldham's Historic Environment 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 website¹](#).
- 1.3. The main purpose of the Topic Paper is to set out:
 - the current key policies, plans and strategies relating to Oldham's Historic Environment that have informed the Local Plan;
 - the main issues, challenges and opportunities relating to Oldham's Historic Environment 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, challenges and opportunities facing the borough in relation to Oldham's Historic Environment;
 - 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
 - in doing so how, with these policies, the Plan sets out an appropriate strategy that is based on proportionate evidence.
- 1.4. Oldham's 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 - Local Plan Review 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 Oldham's Historic Environment and which have informed the policy approach taken.

National Context

National Planning Policy Framework

- 2.2. [National Planning Policy Framework](#)² (NPPF, December 2024, as amended in February 2025) section 16 focuses on conserving and enhancing the historic environment. It outlines that heritage assets from local historic value to those of the highest significance are an irreplaceable resource and should be conserved in a manner appropriate to their significance (paragraph 202).
- 2.3. Paragraph 203 states plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.
- 2.4. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest (paragraph 204).

National Planning Policy Guidance

- 2.5. Planning Practice Guidance on the [historic environment](#)³ (2019) outlines more detail on what a positive strategy for the conservation and enjoyment of the historic environment means. It states plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting.
- 2.6. The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure.
- 2.7. The guidance also sets out that local planning authorities must review their conservation areas from time to time. A conservation area appraisal can be used to help local planning authorities develop a management plan and plan-making bodies to develop appropriate policies for local plans.

² National Planning Policy Framework (December 2024, as amended February 2025) is available at https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

³ Planning Practice Guidance on the historic environment is available at <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

Greater Manchester Context

Greater Manchester Strategy

- 2.8. The [Greater Manchester Strategy 2025](#)⁴ (July 2025) sets the vision for a thriving city region where everyone can live a good life.
- 2.9. The strategy states that we will look after our heritage and ensure that creativity is at the heart of our vibrant and distinctive town and city centres.

Places for Everyone (PfE)

- 2.10. The [Places for Everyone](#)⁵ (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.
- 2.11. The relationship between PfE and the Oldham Local Plan: Publication Plan is explained in the Setting the Scene Topic Paper.
- 2.12. The following PfE policy is relevant to Oldham's Historic Environment Topic Paper:
- 2.13. **Policy JP-P2: Heritage** states that Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness and which should be the priority for conserving and enhancing in the future and demonstrate a clear understanding of the historic environment and the heritage values of sites, buildings or areas and their relationship with their surroundings. This knowledge should be used to inform the positive management and integration of our heritage by:
 - Setting out a clear vision that recognises and embeds the role of heritage in place-making;
 - Ensuring that the heritage significance of a site or area is considered in accordance with national planning policy in the planning and design process and opportunities for interpretation and local engagement are optimised;
 - Integrating the conservation and enhancement of heritage assets and their settings, with creative contextual architectural responses that contribute to their significance and sense of place;
 - Delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing; and
 - Exploring opportunities to reduce greenhouse gas emissions that restoration of historic buildings offer.
- 2.14. Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive

⁴ The Greater Manchester Strategy is available at <https://togetherwearegm.co.uk/>

⁵ Places for Everyone can be viewed at <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-adoption/>

identity and sense of place are protected from harm. These include historic town centres, places of worship, historic transport routes including the canal network, industrial buildings and structures including textile mills, farmsteads and other sites, buildings, and areas of identified archaeological, architectural, artistic and/or historic value.

- 2.15. Where heritage assets have been identified as being at risk, Local Plans should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.
- 2.16. Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process.

Local Context

- 2.17. 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 focus on those parts of the plans relevant to the Oldham's Historic Environment.

The Oldham Plan

- 2.18. The Oldham Plan 2024-2030 Pride, Progress and Partnership⁶ sets out three clear missions to achieve by 2030 to deliver real improvements to the lives of Oldham people - Healthier, Happier Lives, Great Place to Live and Green and Growing.
- 2.19. The mission most relevant to Oldham's Historic Environment is a Great Place to Live where everyone can have the chance to enjoy culture. The Green and Growing mission also hopes to build on Oldham's industrial heritage.

Oldham Council Corporate Plan

- 2.20. Oldham Council's Corporate Plan 'Ready for the Future'⁷ (2024-2027) builds on the Oldham Plan and is focused on the same three missions.
- 2.21. The Plan celebrates the regeneration of two of Oldham's heritage assets – the Oldham Coliseum Theatre and Royton Town Hall. This links to the mission for a Great Place to Live.

Building a Better Oldham

⁶ The Oldham Plan is available at https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan

⁷ The Corporate Plan is available at https://www.oldham.gov.uk/downloads/file/8094/oldham_corpotrate_plan_ready_for_the_future

- 2.22. [Building a Better Oldham](#)⁸ is the Council's ambitious transformation programme for the borough. As with the Partnership's missions, the Local Plan support's delivery of this ambitious programme. Further information can be found in the Setting the Scene Topic Paper.
- 2.23. Many of the specific projects relate to heritage such as the Cultural Quarter and Public Space. Included within the town centre redevelopment project, is the restoration of the Old Library. The refreshed venue will soon become the new home for the Oldham Theatre Workshop, a gallery, and a new Council chamber and offices.
- 2.24. Along with Gallery Oldham and the current Library space, the key asset will play a major role in delivering our cultural quarter offer.
- 2.25. The projects should help enhance Oldham Town Centre conservation area.

Oldham Town Centre Conservation Area Appraisal and Management Plan

- 2.26. The [Oldham Town Centre Conservation Area Appraisal and Management Plan \(CAAMP\) Supplementary Planning Document \(SPD\)](#)⁹ was adopted in 2019.
- 2.27. The CAAMP SPD was prepared to address the issues facing the at-risk conservation area and sets out a positive approach to enable the conservation area to be enhanced and its eventual removal from the at-risk register. The appraisal outlined that some of the negative features in Oldham Town Centre are detracting features, such as vacancy levels and buildings being in poor condition. However, the most significant detracting feature is retail frontages, where the poor-quality contemporary shopfronts dominate handsome buildings. Roller shutters also create a deadening frontage and add to the perception of crime and antisocial behaviour. The lack of wayfinding, need for a stronger identity and the appearance / re-use of vacant sites are also key issues to be addressed.
- 2.28. The Management Plan includes policies to address these issues, providing opportunities to enhance, and uplift the human experience of, the conservation area. The policy areas include securing the viable reuse of vacant heritage assets, opportunities to improve shop fronts, retail frontages and signage and the opportunities that new development can make to improving the character and appearance of the conservation area. Through addressing these issues, the conservation area, and Oldham Town Centre, will become a place that people find welcoming, and which contributes to sense of identity, local pride and well-being.
- 2.29. Improved wayfinding, use of public art and co-ordinated street furniture will further emphasise the conservation area, and its local character and identity, helping people to identify when they have entered or left the area.

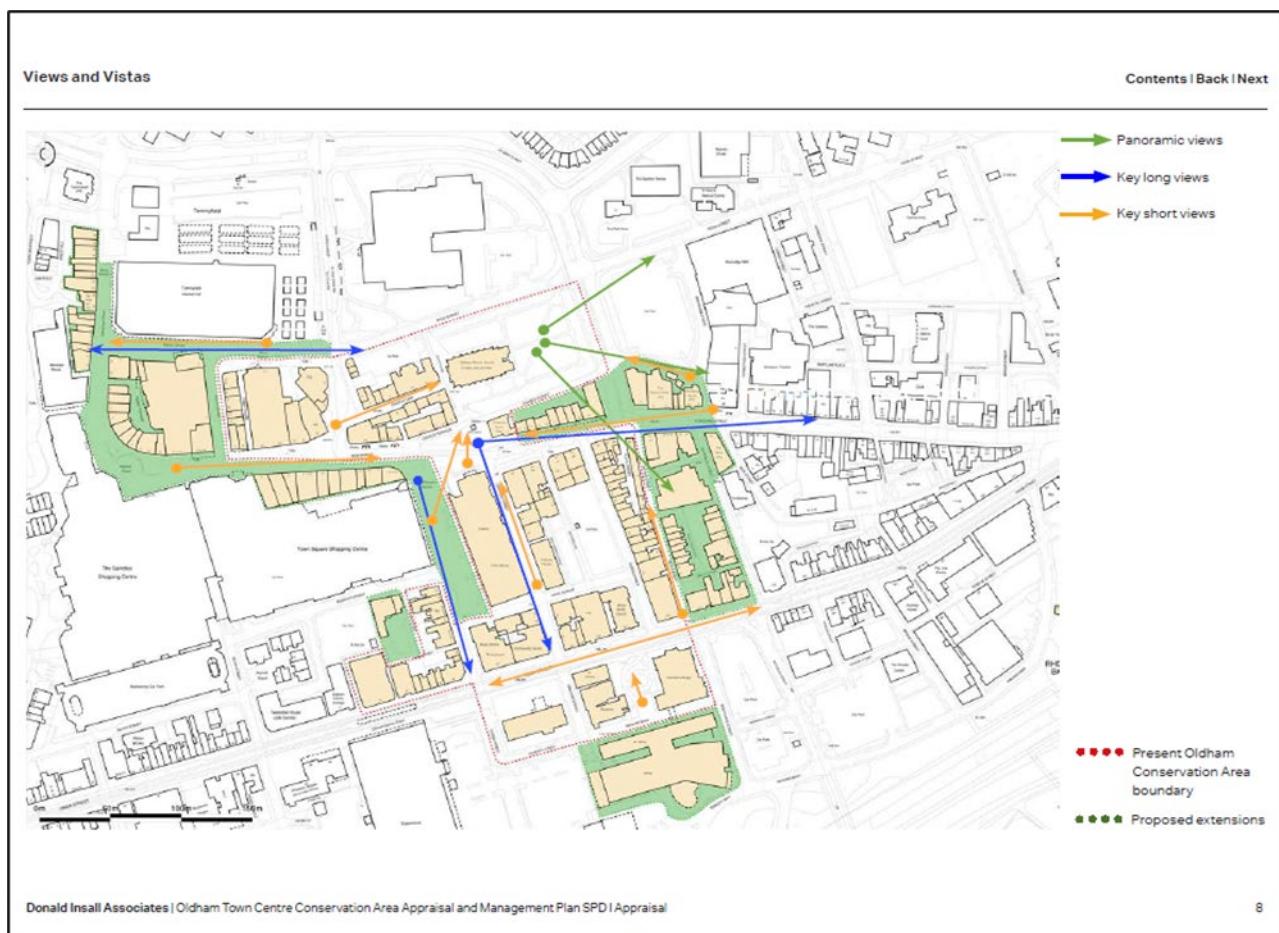
⁸ Building a Better Oldham is available at https://www.oldham.gov.uk/info/201248/building_a_better_oldham#:~:text=Building%20a%20Better%20Oldham%20is,jobs%20and%20100%20apprenticeship%20opportunities.

⁹ The Oldham Town Centre Conservation Area Appraisal and Management Plan SPD is available at https://www.oldham.gov.uk/downloads/download/1599/oldham_town_centre_conservation_area_appraisal_and_management_plan_caamp_supplementary_planning_document_spd

2.30. The appraisal identifies those buildings which make a positive, neutral or negative contribution to the conservation area, key views and vistas, and townscape. These established and valued views (as shown in Map 1), into and out of the conservation area, are protected through the policy as they make an important contribution to the historic context and setting of Oldham Town Centre and include:

- the Church of St Mary and St Peter and along Church Lane;
- views through Parliament square;
- looking west up Yorkshire Street towards Parliament Square;
- along Greaves Street;
- views along Albion Street, Retiro Street, Union Street; and
- from Gallery Oldham.

Map 1: Valued Views and Vistas



2.31. The appraisal proposed four extensions to the existing Oldham Town Centre conservation area boundary. The extensions have been designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and will be adopted as part of the Local Plan. The amended boundary for Oldham Town Centre Conservation Area is on the Policies Map and is shown below.

Map 2: Oldham Town Centre Conservation Area Boundary and Proposed Extensions



- 2.32. The Gazetteer, which forms part of the SPD, provides an important reference of each of the buildings at a point in time within the extended conservation area, noting condition of the assets and a character description. The Gazetteer can be useful for enforcement as well as for development proposals.
- 2.33. The policy relating to Oldham Town Centre conservation area (Policy OTC2) is within the Oldham Town Centre section of the Local Plan. The 'Our Centres' Topic Paper sets out the justification for this policy.
- 2.34. However, some policy recommendations from the CAAMP have also been embedded into Policy HE3.

Oldham Mills Strategy

- 2.35. The [Oldham Mills Strategy](#)¹⁰ (2021) was commissioned by Oldham Council and Historic England in order to develop a positive strategy for the sustainable future of the textile mill stock across Oldham. This work complements Historic England's wider project Mills of the North.
- 2.36. The Oldham Mills Strategy identifies the non-designated mills across Oldham which are of particular landscape and heritage value and sets out a robust strategy to ensure their sustainable future, which considers their potential for future development focussing on residential and employment uses.

¹⁰ The Oldham Mills Strategy is available at https://www.oldham.gov.uk/info/201236/evidence/2819/oldham_mills_strategy

- 2.37. The Mills Strategy sets out policy recommendations for the conservation of the mill stock based on levels of priority relative to the landscape and heritage value of individual mills. The strategy also sets out key actions to support the Council in ensuring the sustainable future of the mill stock.
- 2.38. The Mills Strategy assessed:
 - Needs analysis (housing and employment) (section 3)
 - Landscape (section 4)
 - Heritage significance (section 5)
 - Housing potential (section 6)
 - Employment potential (section 7)
- 2.39. Section 8 categorises individual mills as high, medium or low priority based upon the landscape, heritage and housing / employment assessments.
- 2.40. Section 9 summarises findings of the study and outlines key policy recommendations.
- 2.41. There is a separate landscape overview report that feeds into the Mills Strategy providing an overall analysis of the contribution existing mills make to the landscape character of Oldham.

3. Issues, challenges and opportunities relating to Oldham's Historic Environment

- 2.42. This section summarises the key issues, challenges and opportunities relating to Oldham's Historic Environment that we face in Oldham, underpinned by proportionate and relevant evidence.
- 2.43. The Integrated Assessment identified that there is a need to protect, conserve and enhance the historic environment, including its wider setting and to preserve and conserve archaeological heritage.

Heritage at risk

- 2.44. PfE Policy JP-P2 Heritage directs Local Plans to set out the key elements which contribute to the district's identity, character and distinctiveness to inform a positive management of our heritage.
- 2.45. The policy states particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. This includes historic town centres.
- 2.46. Where heritage assets have been identified as being at risk, Local Plans should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.
- 2.47. Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s).
- 2.48. The Oldham Town Centre CAAMP SPD was prepared to address the at-risk conservation area and to enable a positive strategy in the Local Plan.
- 2.49. It is hoped that through implementation of the CAAMP the Town Centre conservation area will be enhanced, leading to its removal from the Historic England 'at-risk' register.

Oldham's industrial heritage

- 2.50. PfE Policy JP-P2 Heritage directs Local Plans to set out the key elements which contribute to the district's identity, character and distinctiveness to inform a positive management of our heritage.
- 2.51. Oldham with its hugely significant industrial past is rich in history and heritage with both designated and non-designated assets. In particular, the clusters of mills contributing to Oldham's landscape character, give the borough an exceptionally strong identity and sense of place.
- 2.52. In order to ensure a positive strategy Oldham Council and Historic England commissioned a Mills Strategy to set out which of the 64 non-designated¹¹ mills are

¹¹ Non-designated heritage assets are assets, such as textile mills, that have local historic or architectural significance but are not listed.

the highest priority in terms of their historic significance with opportunity to be retained and put to a sustainable use and which mills are of lower priority and may offer potential for alternative redevelopment.

- 2.53. Listed Mills, mills that have been converted (or have consent to be) or demolished were not included within the overall strategy.
- 2.54. The non designated mills have been categorised as high, medium and low priority based upon the assessment of their landscape and heritage value, alongside housing and employment potential considerations, in order to inform the formulation of a positive strategy to support the long-term sustainability of the textile mill stock across Oldham.
- 2.55. The mills assessed as having high landscape value and heritage / townscape value are placed within the high priority category with a clear presumption against their loss or demolition. The mills identified as being of medium priority will remain important to retain and re-use, however, there will be a higher degree of flexibility in their alteration / conversion. It is likely that mills within this category will be less sensitive to alteration than those in the high category and therefore more significant interventions may be deemed acceptable, subject to being weighed in the planning balance.
- 2.56. Those mills which are assessed as having comparatively low landscape value and heritage significance have been placed within the low priority category. It is anticipated that there will be greater flexibility in how these mills could be reused or converted and such mills may also have potential for redevelopment. These sites feature mills which have very little architectural presence, where they have been altered significantly so that their heritage value is decreased and where the mills may be causing harm to the social and environmental value of the local community.
- 2.57. The Mills Strategy recommended a policy approach which has been embedded into Policy HE4.
- 2.58. The Mills Strategy also suggested actions and recommendations for the Council to consider going forward, such as the identification of high priority mills as non-designated heritage assets.

4. Oldham's Historic Environment and the Oldham Local Plan: Publication Plan

- 4.1. This section of the Topic Paper looks at each of the policies contained in Oldham's Historic Environment 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 Oldham's Historic Environment;
 - 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 HE1: The Historic Environment

Summary of evidence

- 4.3. NPPF states plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting.
- 4.4. Oldham Town Centre CAAMP SPD and the Oldham Mills Strategy are two key pieces of evidence that have been prepared to support the Local Plan and enable a positive strategy and opportunities for the historic environment.

Draft Local Plan consultation and Duty to Co-operate

- 4.5. Historic England responded to the Regulation 18 consultation in 2017 outlining potential sources of evidence that the Local Plan could take into account. This included conservation area appraisals.
- 4.6. Over time this led to the completion of the Oldham Town Centre CAAMP SPD and the Oldham Mills Strategy.
- 4.7. Historic England responded to Issues and Options consultation and agreed that the issues highlighted relevant to the historic environment would set out a positive strategy for the conservation and enhancement of the historic environment if translated into policy.
- 4.8. Policy HE1 has been proposed to set the overall positive strategy for the historic environment in Oldham.
- 4.9. At Draft Plan stage there was general support overall with some comments not relating directly to the policy wording. The responses received are summarised below.

Table 1: Summary of comments and amendments to Policy HE1: The Historic Environment

Respondent	Summary of Comment	Council Response
Historic England	Request the source of the information on the Mills and the Conservation Area. In all other respects, support the policy.	Footnotes have been added to these paragraphs to reference evidence sources.
CBRE on behalf of Sigma Property Co	Requests clause 7, in relation to the implementation of the Mills Strategy, be removed, unless and until a further update to the Mills Strategy is completed in order to address concerns with Policy HE4.	Clause not removed. The Mills Strategy was subject to targeted consultation and responses were reviewed. The implementation of the strategy includes more than considering what priority a mill has been given. It includes factors such as looking at funding streams to support conversions; engagement with landowners to support mill specific strategies and a marketing strategy. There is no reason why a positive strategy should not be implemented.
CPRE	The Local Plan should support the local authorities to deliver beauty and protect and enhance the important heritage assets around Oldham. The Local Plan should protect and enhance historic strengths in the place-making of the future, and this includes the area's social history, particularly rural.	Comment noted.
Chadderton Together	Chadderton Together has secured an approval to apply for £2.2m from Heritage Lottery for the restoration of Foxdenton Hall and Park. The allocation of the adjoining	Comment not applicable to policy wording.

Respondent	Summary of Comment	Council Response
	land for employment will create an inappropriate environment for the hall and park.	
Sally Hulse	Support the policy.	Support noted.
Julie Ball	Reopen the Coliseum building with new management instead of building a new building. Make use of an already good space.	Comment noted. No specific amendments to policy requested.

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

4.11. Oldham Council met with Historic Environment on 1 July 2025 to provide an update on the amendments that had been made to the Local Plan since Draft Plan stage. The footnotes added were noted.

Policy Approach

4.12. Due to the need to set a positive strategy for conservation and enjoyment of the historic environment under NPPF and the need to identify the key elements of the historic environment that will be conserved and enhanced, as set out in PfE JP-P2, Policy HE1 has been developed.

4.13. Policy HE1 outlines support for proposals that positively conserve and enhance the historic environment. The policy then sets out overarching policy aims forming the positive strategy which the Council and partners will work towards. It states we will:

1. Secure the preservation and enhancement of Oldham's heritage assets;
2. Promote and support heritage-led regeneration and development;
3. Produce or update conservation area appraisals and management plans;
4. Continue to enhance Oldham Town Centre Conservation Area with the aim of removing it from the 'at risk' register;
5. Manage development proposals affecting conservation areas and ensure that elements which contribute to a conservation area's special character and appearance are preserved and enhanced;
6. Seek to identify and acknowledge local non designated heritage assets;
7. Work positively to help implement the Oldham Mills Strategy to safeguard the future of heritage assets at risk;
8. Protect and enable restoration and appreciation of the canals; and
9. Maximise opportunities to increase the understanding and interpretation of the borough's historic environment.

4.14. The supporting text provides an overview of Oldham's historic environment, relevant legislation and information on the Local Listing project and Historic Environment Record.

4.15. Since Draft Plan stage footnotes referencing evidence have been added.

Monitoring

4.16. Policy HE1 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1

4.17. The Local Plan indicators that will be used to monitor this policy are:

- Number of heritage assets on the National Heritage List for England
- Number of listed buildings and number of buildings in conservation areas lost through new development
- Number and type of developments permitted on non-designated Mills

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

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

4.19. As this policy is informed by PfE Policy JP-P2, the PfE monitoring framework will also help to monitor this chapter.

4.20. The following PfE monitoring indicator will help to monitor this policy:

- Increase percentage of buildings on the “at risk register” with a strategy for their repair and re-use

4.21. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy HE1.

Integrated Assessment

4.22. The IA of Policy HE1 resulted in 17 positive / significantly positive scores and 9 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

4.23. The HRA screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy HE2: Securing the Preservation and Enhancement of Oldham's Heritage Assets

Summary of evidence

- 4.24. NPPF sets out national planning policy on proposals affecting heritage assets.
- 4.25. Policy JP-P2: Heritage states that Local Plans should ensure that the heritage significance of a site or area is considered in accordance with national planning policy in the planning and design process and opportunities for interpretation and local engagement are optimised.

Draft Local Plan consultation and Duty to Co-operate

- 4.26. In response to the Draft Plan consultation there were two responses to the consultation. One was from an individual expressing support.
- 4.27. The second was from Historic England who requested that 'development will be permitted' was replaced with 'development will be supported'. This amendment was made.
- 4.28. Historic England also requested that details of the 'At-Risk' Register be added into the supporting text. A footnote referencing where the 'At-Risk' Register can be found has been added to the supporting text.
- 4.29. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.30. Oldham Council met with Historic Environment on 1 July 2025 to provide an update on the amendments that had been made to the Local Plan since Draft Plan stage. The amendments were noted.

Policy Approach

- 4.31. It was considered that a policy which provides more detail to help determine proposals affecting heritage assets with respect to details such as the degree of harm to the significance of the designated heritage asset, how archaeological sites of less than national importance would be considered and details of what a Heritage Statement should include would be helpful.
- 4.32. Policy HE2 addresses:
 - support to put heritage assets to viable sustainable uses;
 - the degree of harm to the significance of the heritage asset;
 - details of action that will be taken to secure the appropriate restoration or maintenance of heritage assets at risk;
 - the sympathetic design of heritage assets;
 - proposals affecting an archaeological site of less than national importance;
 - the total or partial loss of a heritage asset; and

- details of what a Heritage Statement should include.

4.33. The Reasoned Justification provides further detail on the above policy.

4.34. Since Draft Plan stage the policy has been amended to address comments made by Historic England (see previous section). Other amendments were minor / presentational.

Monitoring

4.35. Policy HE2 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.36. The Local Plan indicators that will be used to monitor this policy are:

- Number of heritage assets on the National Heritage List for England
- Number of listed buildings and number of buildings in conservation areas lost through new development
- Number and type of developments permitted on non-designated Mills

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

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

4.38. As this policy is informed by PfE Policy JP-P2, the PfE monitoring framework will also help to monitor this chapter.

4.39. The following PfE monitoring indicator will help to monitor this policy

- PfE indicator Increase percentage of buildings on the “at risk register” with a strategy for their repair and re-use.

4.40. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy HE2.

Integrated Assessment

4.41. The IA of Policy HE2 resulted in 16 positive / significantly positive scores and 10 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

4.42. The HRA screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy HE3: Development proposals affecting Conservation Areas

Summary of evidence

- 4.43. There are 36 conservation areas across the plan area.
- 4.44. The most up to date conservation area appraisal is the Oldham Town Centre CAAMP SPD, prepared as evidence for the Local Plan and to set a positive strategy for Oldham Town Centre conservation area which is on Historic England's At-Risk Register.
- 4.45. It is felt that some policies from the Oldham Town Centre Conservation Area Appraisal and Management Plan (CAAMP) SPD are applicable to other conservation areas. As such, specific policies on shop fronts and signage and new development have been incorporated into the Local Plan.
- 4.46. The remaining conservation areas would benefit from updated appraisals and management plans, particularly as 20 conservation areas in the borough are 'vulnerable'¹², meaning they are at risk of neglect, decay or inappropriate development or are vulnerable to becoming so.
- 4.47. Previous conservation area appraisals may still contain relevant information, but they were prepared a long time ago. Further conservation appraisals may be prepared in time.

Draft Local Plan consultation and Duty to Co-operate

- 4.48. In response to the Draft Plan consultation there were three respondents (Historic England, a planning agent and an individual) all of which supported the policy. No amendments were requested.
- 4.49. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.

Policy Approach

- 4.50. Policy HE3 has been developed to provide further policy in relation to conservation areas, including policy contained within the Oldham Town Centre CAAMP, which could be applicable to other conservation areas.
- 4.51. Policy HE3 sets out that proposals affecting a conservation area should preserve or enhance those elements which contribute to its character and appearance.
- 4.52. The policy sets out how loss of a building or elements which makes a positive contribution to the significance of the conservation area will be viewed.
- 4.53. The policy sets out criteria for proposals within or affecting a conservation area regarding design; building plots; street patterns and open space etc and changes of use.

¹² For details on Conservation Areas at Rk please see the Historic Environment Topic Paper (08.01.12) prepared to support PFE available at <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-previous-stages/places-for-everyone-2021-regulation-19/supporting-documents-2021/?folder=08%20Places%20for%20People#fList>

- 4.54. The policy then sets out criteria relating to shopfronts, retail frontages and signage which has been informed by the Oldham Town Centre CAAMP SPD.
- 4.55. The policy sets out when a Heritage Statement is required and references the need to take into account the statutory provision for the protection of trees.
- 4.56. The Reasoned Justification provides more detail on loss of a building or element; the application of the CAAMP SPD in relation to this policy; trees, conservation area appraisals and the designation of future conservation areas.
- 4.57. Since Draft Plan stage some minor amendments have been made to provide more clarity. Key amendments are:
 - Criterion 8 has been amended from 'Signage must not dominate the building façade and should relate to its character, scale and architectural features' to 'Signage should relate to its character, scale and architectural features, avoiding dominating the building façade'.
 - Criterion 10 has been amended from 'Shop signs must be located at fascia level and follow the pattern within the street' to 'Shop signs will be located at fascia level and follow the pattern within the street, avoiding high level signs'.

Monitoring

- 4.58. Policy HE3 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.59. The Local Plan indicators that will be used to monitor this policy are:
 - Number of listed buildings and number of buildings in conservation areas lost through new development
- 4.60. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:
 - Further guidance on the relevant policy matter may be produced through the preparation of supplementary plans.
 - 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 Policy HE3.

Integrated Assessment

- 4.62. The IA of Policy HE3 resulted in 12 positive / significantly positive scores and 14 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

4.63. The HRA screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy HE4: Oldham's Mills

Summary of evidence

4.64. PfE Policy JP-P2: Heritage states that Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness and which should be the priority for conserving and enhancing in the future.

4.65. The Oldham Mills Strategy was commissioned by Oldham Council and Historic England to develop a positive strategy for the sustainable future of the textile mill stock across Oldham. This work complements Historic England's wider project 'Mills of the North'.

4.66. The Oldham Mills Strategy identifies the non-designated mills across Oldham which are of landscape and heritage value and sets out a robust strategy to ensure their sustainable future, which considers their potential for future development focussing on residential and employment uses.

4.67. The Mills Strategy recommended a policy approach which has been embedded into the Local Plan.

Draft Local Plan consultation and Duty to Co-operate

4.68. The concept of a Mills Strategy was suggested by Historic England as part of Duty to Cooperate meetings in 2018.

4.69. From this, the Mills Strategy was commissioned jointly between Oldham Council and Historic England.

4.70. The Oldham Mills Strategy has led to Policy HE4.

4.71. At Draft Plan stage there were mixed responses to the policy – the policy was supported by some respondents and not supported by agents acting on behalf of landowners / and promoters of specific mills. The responses are summarised below with any amendments made.

Table 2: Summary of comments and amendments to Policy HE4: Oldham's Mills

Respondent	Summary of Comment	Council Response
Historic England	Support the policy subject to an amendment, suggest that on the section of high priority mills, 'public' should be inserted before benefits on the second to last line.	Public has been inserted under 'High Priority Mills' to read 'where the public benefits of the development would outweigh the harm'.
Sally Hulse and Alan Chorton	Support the policy.	Support noted.

Respondent	Summary of Comment	Council Response
CBRE on behalf of Sigma Property Co	Questions inconsistencies with the scoring of Marlborough Mill in the Mills Strategy and sets out the reasons why. Requests that the Mill Strategy is revisited.	Targeted consultation was carried out on the Mills Strategy, which CBRE responded to, albeit not concerning Marlborough Mill. The Mills Strategy sets out the methodology and was developed in partnership with Historic England. The Mills Strategy and Policy HE4 provide a policy framework to help assess planning proposals affecting non-designated mills. Applicants can provide evidence as part of a planning application to justify any difference to the level of significance afforded to a mill.
Lathams on behalf of Whiteoak Ltd (Purico)	Greenfield Mill (Fletchers) should be categorised as a Low Priority Mill. The detailed heritage assessment identifies three buildings which have some heritage significance, and which are worthy of retention. The main industrial buildings have little or no heritage value. The PfE JPA 15 endorses this approach and accepts the loss of all existing buildings with the exception of the three identified as having clear heritage significance.	Greenfield Mill has been removed from the policy in response to demolition of most of the mill complex.

- 4.72. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.73. Oldham Council met with Historic Environment on 1 July 2025 to provide an update on the amendments that had been made to the Local Plan since Draft Plan stage. The amendment was noted.
- 4.74. Greenfield Mill was also discussed, and it was agreed to remove reference to it from Policy HE4.

Policy Approach

- 4.75. Policy HE4 has been drafted to provide a localised heritage policy for Oldham's textile mills, which are a key element of Oldham's character and sense of place.
- 4.76. Policy HE4 has been directly informed by the Oldham Mills Strategy.
- 4.77. The policy sets out that the Council will proactively support proposals that establish a positive future for Oldham's Textile Mills through their reuse and repair. Proposals should retain those elements of the mill stock which contribute to the local identity and sense of place of Oldham and ensure they are appropriately conserved in a manner appropriate to their significance.
- 4.78. The policy then sets out criteria for High, Medium and Low Priority Mills:
 - **High Priority Mills** – 21 mills are identified as High Priority which make a clear positive contribution to local character and distinctiveness and are identified as non-designated heritage assets. The Council will support applications which include the retention and reuse of the identified high priority mills and all associated buildings and structures. Proposals which would remove, harm or undermine the significance of a high priority mill or its contribution to local distinctiveness and sense of place will be permitted only where the public benefits of the development would outweigh the harm.
 - **Medium Priority Mills** – 22 mills are identified as Medium Priority. The Council will actively encourage and support applications that include the retention and reuse of identified medium priority mills and associated buildings and structures. Development proposals that include the alteration, extension or demolition of any medium priority mills and their associated buildings will need to demonstrate with clear justification, in relation to the significance and setting of the asset and identified public benefits.
 - **Low Priority Mills** – 15 mills are identified as Low Priority. The identified low priority mills are generally considerably altered and make a limited contribution to local distinctiveness and sense of place. Development proposals involving the comprehensive redevelopment of low priority mills and / or their retention will be supported in principle subject to compliance with other policies of the Local Plan.
- 4.79. This Topic Paper noted earlier the importance of Clusters of Mills in terms of contributing to Oldham's character and sense of place. Policy HE5 states that the Council will support applications which retain mills and their associated buildings that have been identified as contributing to an identified cluster.
- 4.80. Six Mill Clusters have been identified, as follows:
 - Cluster 1 – Briar Mill, Lilac Mill and Duke Mill;
 - Cluster 2 – Majestic Mill, Cairo Mill and Longrange Mill;

- Cluster 3 – Manor Mill, Werneth Mill (Featherstall Road North), Osborne Mill, Anchor Mill, Stockfield Mill and Hartford Works;
- Cluster 4 – Chadderton Mill, Nile Mill, Raven Mill, Ace Mill, Gorse Mill and Ram Mill;
- Cluster 5 – Vale Mill, Devon Mill, Heron Mill, Earl Mill and Bell Mill; and
- Cluster 6 – Ivy Mill, Regent Mill and Marlborough Mill

4.81. Development proposals which will detract or harm a mill cluster through demolition, interruption of key identified views or through inappropriate development by virtue of its design will not be supported unless there is a clear and convincing justification.

4.82. Proposals that would result in the total or partial loss of elements of Oldham's mill stock, will require the full recording of the heritage asset and the record and commentary deposited with the Local Planning Authority and the Historic Environment Record.

4.83. The Reasoned Justification provides more detail to the Mills Strategy and each priority category.

4.84. Since Draft Plan stage, the policy has been amended in response to Historic England's comment.

4.85. It has also been amended in response to the Greenfield Mill complex being mostly demolished, and Elm Mill, Lily Mill and Paradise Mill being demolished and therefore removed from Policy HE4.

4.86. Elm Mill and Lily Mill have also subsequently been removed from Cluster 1.

Monitoring

4.87. Policy HE4 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.88. The Local Plan indicator that will be used to monitor this policy is:

- Number and type of developments permitted on non-designated Mills

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

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

4.90. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy HE4.

Integrated Assessment

- 4.91. The IA of Policy HE4 resulted in 13 positive / significantly positive scores and 13 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.
- 4.92. The HRA screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy HE5: Canals

Summary of evidence

- 4.93. The Huddersfield Narrow Canal and Rochdale Canal both pass through Oldham Borough. The canal network has played a significant part in the development and heritage of the settlements in Oldham since the 18th century.
- 4.94. NPPF outlines that heritage assets including those of local historic value are an irreplaceable resource and should be conserved in a manner appropriate to their significance.
- 4.95. PfE Policy JP-P2: Heritage states that Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness.

Draft Local Plan consultation and Duty to Co-operate

- 4.96. At Draft Plan stage there was support for the policy, with an amendment requested, as outlined below.

Table 3: Summary of comments and amendments to Policy HE5: Canals

Respondent	Summary of Comment	Council Response
Historic England	Support the policy, subject to an amendment. Some of the heritage assets on the canals are designated (and maybe undesignated), so this should be mentioned here. Suggest inserting reference to 'heritage assets (designated and undesignated)'.	Amendment done as requested.
Canals and Rivers Trust, Natural England, Kirklees Council and Sally Hulse,	Comments of support.	Support noted.
Lancashire Wildlife Trust	In general agreement and support for the policy, consideration of ecological assets will need to be taken into	Support noted. The plan needs to be read as a whole. It is considered that other policies within

Respondent	Summary of Comment	Council Response
	account in any improvement proposals.	the Local Plan address this point.

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

4.98. Oldham Council met with Historic Environment on 1 July 2025 to provide an update on the amendments that had been made to the Local Plan since Draft Plan stage. The amendment was noted.

Policy Approach

4.99. As canals are also a key element in Oldham's character and sense of place a local policy on Canals was considered appropriate.

4.100. Policy HE5 states the Huddersfield Narrow Canal and Rochdale Canal will be protected as heritage assets (designated and non-designated heritage), which contribute to the borough's sense of place.

4.101. To ensure that the future restoration of the canals is enabled, development alongside the line of the canal and towpath shall not prevent its restoration, conservation and enhancement of the waterway's heritage and built environment. Green Infrastructure incorporating walking, wheeling and cycling routes and heritage interpretation features along its line should be provided.

4.102. Proposed development that harms the setting or appearance of the canal will not be supported. Any new development should respect the canal frontage, ensuring active quality elevations, whilst respecting the unique character of the waterway and its associated heritage assets. Opportunities should be taken to improve the appearance and vitality of the canal side environment.

4.103. The Reasoned Justification provides more information on the importance of the canals.

4.104. Since the Draft Plan stage, the policy has been amended in response to Historic England's comment.

4.105. In addition, reference to 'wheeling' has been added alongside walking and cycling to reflect changes to terminology for sustainable modes of transport.

Integrated Assessment

4.106. The IA of Policy HE5 resulted in 16 positive / significantly positive scores and 10 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

4.107. The HRA has screened the policy in due to potential impacts on the Rochdale Canal SAC during any restoration.

4.108. The HRA identifies mitigation measures to address any likely significant effects. This includes:

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

4.109. 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. This requirement has been added to Policy CC3.

5. Conclusion

Providing an appropriate strategy

5.1 Policies HE1 to HE5 of the Oldham Local Plan: Publication Plan provide the policy framework for ensuring that the Local Plan sets a positive strategy for the conservation and enjoyment of the historic environment.

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 delivery of PfE which provides the strategic direction and context for the borough. The Local Plan sets out the key elements which contribute to the district's identity, character and distinctiveness and which is a priority for conserving and enhancing in the future in relation to the historic environment. This knowledge has been used to inform the positive management and integration of heritage through for example ensuring that the heritage significance of a site or area is considered in accordance with national planning policy in the planning and design process and opportunities for interpretation and local engagement are optimised.

The policies that make up our positive strategy focus on conservation areas, including Oldham Town Centre conservation area, textile mills and canals.

The policies have been positively prepared through working closely with Historic England who helped identify what the key elements of the historic environment the Local Plan should focus on early in the plan preparation; jointly commissioned evidence on mills and provided consultation feedback and positive engagement in Duty to Cooperate meetings.

b) **Justified:** policies HE1 to HE5 provide an appropriate strategy in relation to Oldham's Historic Environment matters across Oldham. The policies have been informed by the Oldham Town Centre CAAMP SPD, the Oldham Mills Strategy and through consultation feedback.

The policies help achieve the vision of the Local Plan as they will help ensure the key characteristics of Oldham's townscape and landscape types and Oldham's historic environment and rich heritage will be conserved and enhanced.

The policies help implement 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;
- conserving and enhancing the borough's historic environment and heritage assets, including the borough's textile mills; and
- ensuring that proposals within Oldham Town Centre follows the recommendations set out in the Oldham Town Centre Conservation Area

Management Plan with the aim of removing the Conservation Area from the 'at-risk' register.

The policies will help achieve the Corporate Plan and Oldham Plan missions for Oldham to be a Great Place to Live

- c) **Effective:** the Oldham Local Plan: Publication Plan supports delivery of PfE which sets out the strategic framework for heritage. The plan period of up to 2039 reflects that of PfE and continued effective joint working arrangements with PfE districts on cross-boundary strategic matters, will support delivery of the joint and local plans. 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 HE1 to HE5 support delivery of sustainable development in accordance with relevant national policy, in particular:
 - i. By identifying specific opportunities across Oldham borough for the conservation and enhancement of heritage assets, including their setting. This has been achieved for our conservation areas, textile mills and canals.
 - ii. Through setting a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This has been achieved for Oldham Town Centre conservation area and Oldham's textile mills.