

Oldham

Local Plan

Publication Plan: Communities Topic Paper

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Oldham
Council

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1. Introduction and Purpose

- 1.1. This is the Communities 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 at [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 communities that have informed the Local Plan;
 - the main issues, challenges and opportunities relating to communities 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 communities;
 - 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 - 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 communities and which have informed the policy approach taken.

National Context

National Planning Policy Framework

- 2.2. National Planning Policy Framework² (NPPF) sets out several policies relating to communities as set out below.
- 2.3. Paragraph 8 sets out the overarching objectives to achieving sustainable development – the social objective 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’.
- 2.4. Chapter 8 'Promoting Healthy and Safe Communities' states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion - for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continental use of public areas; and
 - c) enable and support healthy lifestyles, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- 2.5. Paragraph 97 sets out that local planning authorities should refuse applications for hot food takeaways and fast-food outlets:
- a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or
 - b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social behaviour.
- 2.6. This chapter also states that to deliver social, recreational and cultural facilities and services for the community, planning policies and decisions should:

² National Planning Policy Framework (December 2024, as amended February 2025) available at: https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF_December_2024.pdf

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
 - b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
 - c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
 - d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
 - e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
- 2.7. Paragraph 100 sets out that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:
- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
 - b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.
- 2.8. To ensure faster delivery of other public service infrastructure such as health, blue light, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.
- 2.9. In relation to open space and sport and recreation, paragraph 103 states that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
- 2.10. Paragraph 104 states that existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:
- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

National Planning Policy Guidance

Open space, sports and recreation facilities, public rights of way and local green space (2014)³

- 2.11. This guidance sets out that open space should be taken into account in planning for new development and considering proposals that may affect existing open space (see National Planning Policy Framework paragraph 96). Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework paragraphs 7-9).
- 2.12. It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. It goes on to set out the requirements in terms of planning for sport and recreation provision, including the need to consult Sport England in terms of needs assessments and relevant planning applications.

Healthy and Safe Communities (2019)⁴

- 2.13. This practice guidance sets out that the design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).
- 2.14. It defines that a healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing. The PPG states that a health impact assessment is a useful tool to use where there is expected to be significant impacts of development on health.
- 2.15. In terms of hot food takeaways, the guidance states that local planning authorities can have a role by supporting opportunities for communities to access a wide range of healthier food production and consumption choices. Planning policies and supplementary planning documents can, where justified, seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate (and where such uses require planning permission). Planning policies and proposals may need to have particular regard to the following issues:
- proximity to locations where children and young people congregate such as schools, community centres and playgrounds;
 - evidence indicating high levels of obesity, deprivation, health inequalities and general poor health in specific locations;

³ Available at: <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

⁴ Available at: <https://www.gov.uk/guidance/health-and-wellbeing>

- over-concentration of certain uses within a specified area;
 - odours and noise impact;
 - traffic impact; and
 - refuse and litter
- 2.16. In terms of education and school places, the guidance sets out that plans should seek to meet the development needs of their area, including community facilities such as schools. They should, at the most appropriate level, allocate sufficient suitable land for schools to meet the need anticipated over the plan period, taking into account needs that may cross local authority boundaries. Plan-makers will need to work with local authorities with education responsibilities and developers to coordinate the phasing and delivery of housing growth with the delivery of new school places to ensure that sufficient school capacity is available at the right time.

Localism Act (as amended), (HM Government, 2011)⁵

- 2.17. The Localism Act, 2011 sets out a number of measures to produce a lasting shift in power, away from Central Government and towards Local Government and local people. The four key measures within The Act are:
- New freedoms and flexibilities for local government;
 - New rights and powers for communities and individuals;
 - Reform to make the planning system more democratic and more effective; and
 - Reform to ensure that decisions about housing are taken locally.
- 2.18. An important function introduced under this measure, is the 'Community Right to Build'. This function gives groups of people in the local community the power to build new community-based developments, including housing, businesses, shops, playgrounds or community halls, providing they meet certain criteria. This right aims to ensure that benefits of the development, such as profits from letting homes, remain within the community and can go towards other community functions.

Planning for Healthy Places (Town and Country Planning Association, 2024)

- 2.19. This guidance⁶ aims to raise awareness about the important links between planning and health, and support those working across urban and rural local authorities in England to promote health through Local Plans.
- 2.20. It sets out that Local Plans should include soundly evidenced, strong and clearly defined health and wellbeing requirements, specifying what is required from developers when they make a planning application or submit a development proposal for assessment by a local planning authority.
- 2.21. The guidance recommends that Local Plans consider the following in policy making recommendations:
- Create a strategic health policy

⁵ Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents>

⁶ Available at: <https://www.tcpa.org.uk/resources/planning-for-healthy-places-a-guide-on-embedding-health-in-local-plans-and-planning-policy-in-england/>

- Embed process for health impact assessments (HIA) of development proposals
 - Promote healthy neighbourhood design
 - Promote healthy homes
 - Promote a healthy food environment
 - Promote natural environments and climate adaptation
 - Promote healthy transport and movement
 - Include relevant planning conditions
 - Set clear expectations regarding funding of health requirements
 - Set clear expectations regarding viability appraisals
 - Explore mechanisms to require developers to produce health management plans
 - Set clear expectations regarding monitoring obligations
 - Prioritise stewardship, community engagement and ownership
- 2.22. It is recommended that Local Plans and health focused planning policies define health using the World Health Organisation's (WHO) definition (1948), or one locally agreed: "Health is a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity." and "The enjoyment of the highest attainable standard of health is one of the fundamental rights of every human being without distinction of race, religion, political belief, economic or social condition."
- 2.23. Health inequalities are defined as "avoidable, unfair and systematic differences in health between different groups of people." (The King's Fund, 2022).

Get Active: a strategy for the future of sport and physical activity (2023)

- 2.24. This Strategy⁷ builds on 'Sporting Future' (2015), the government's previous strategy for sport. It aims to tackle high levels of inactivity and make sure that sport and physical activity is accessible, inclusive and sustainable. The Strategy sets out how the government will work together with the sport sector to ensure these aims.
- 2.25. Central to the Strategy is ensuring that children establish a lifetime of engagement with sport and physical activity, with the introduction of national targets for participation.

Uniting the Movement, Sport England (2022)⁸

- 2.26. This is a ten-year vision to transform lives and communities through sport and physical activity. It sets out five key issues to tackle over the ten years, including:
- Recover and reinvent – providing sport and physical activity opportunities that meet the needs of a generation;
 - Connecting communities – focusing on sport and physical activity's ability to make places better places to live;

⁷ Available at: <https://www.gov.uk/government/publications/get-active-a-strategy-for-the-future-of-sport-and-physical-activity>

⁸ Available at: <https://www.sportengland.org/about-us/uniting-movement>

- Positive experiences for children and young people – sport and physical activity as a foundation for a long and healthy life;
- Connecting with health and wellbeing – strengthening connections between sport, physical activity and health and wellbeing so more people can feel the benefits of an active life; and
- Active environments – creating and protecting places and spaces for sport and physical activity.

Sport England Active Design – Planning for health and wellbeing through sport and physical activity, (Sport England, NHS, Public Health England & Department of Health, 2023)⁹

- 2.27. Active Design aims to encourage and promote sport and physical activity through the design and layout of our built environment to support a step change towards healthier and more active lifestyles. It is supported by Public Health England and is part of collaborative action to promote the principles set out in Public Health England's 'Everybody Active, Every Day' strategy, to create active environments that make physical activity the easiest and most practical option in everyday life.
- 2.28. Three Key Active Design objectives of Accessibility, Amenity and Awareness, underpin Active Design Principles:
- Improving Accessibility – providing easy, safe and convenient access to a choice of opportunities for participating in sport and physical activity and active travel for the whole community;
 - Enhancing Amenity – promoting environmental quality in the design and layout of new sports and recreational facilities;
 - Increasing Awareness – raising the prominence and legibility of sports and recreational facilities and opportunities for physical activity through the design and layout of development.
- 2.29. Drawing from the three key objectives, ten Active Design Principles have been identified:
1. Activity for all;
 2. Walkable communities;
 3. Connected walking & cycling routes;
 4. Co-location of community facilities;
 5. Network of multifunctional open space;
 6. High-quality streets and spaces;
 7. Appropriate infrastructure;
 8. Active buildings;
 9. Management, maintenance, monitoring and evaluation; and
 10. Activity promotion & local champions.
- 2.30. Working with local communities and stakeholders, Active Design can be explicitly promoted through Local Plans and has an important role to play in plan making activity by:

⁹ Available at: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

- Contributing to the evidence base for plans;
- The use of the model in planning policy;
- Inspiring and informing planning policies to promote healthy communities;
- Informing the approach to the use of the CIL; and
- Assisting in identifying relevant health and physical activity indicators to inform the ongoing monitoring and evaluation of planning policy.

Planning for Sport Guidance (Sport England, 2019, updated 2024)¹⁰

2.31. Sport England's Planning for Sport guidance sets out 12 principles:

1. Recognise and give weight to the benefits of sport and activity
2. Undertake, maintain and apply robust up to date assessments of need and strategies for sport and physical activity provision and base policies decisions and guidance upon them.
3. Plan, design and maintain buildings, developments, facilities, land and environments that enable people to lead active lifestyle
4. Protect and promote existing sport and physical activity provision and ensure new development does not prejudice its use
5. Ensure long term viable management and maintenance of new and existing sport and physical activity provision
6. Support improvements to existing sports and physical activity provision where they are needed
7. Encourage and secure wider community use of existing and new sport and physical activity provision
8. Support new provision, including allocating new sites for sport and physical activity which meets identified need.
9. Ensure a positive approach to meeting the needs generated by new development for sport and physical activity provision
10. Provide sport and physical activity provision which is fit for purpose and well designed
11. Plan positively for sport and physical activity provision in designated landscapes and the Green Belt
12. Proactively address any amenity issues arising from sport and physical activity developments.

2.32. It is accompanied by further policy guidance by Sport England including:

- Playing Fields Policy – exists to protect playing fields and ensure they are not lost or adversely affected by development. The policy sets out how Sport England assesses these applications and includes five specific exceptions under which it may not object. Sport England will oppose planning permission for developments that would result in the loss or prejudice of playing field use

¹⁰ Available at: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport>

unless one of the policy exceptions is met.

- Planning Applications Guidance – which sets out that Sport England must be consulted on any planning application affecting playing field land, as defined in national planning legislation. A playing field is any site containing at least one marked pitch of 0.2 hectares or more. The guidance outlines when consultation is required.
- Assessing Needs Guidance - which provides a structured approach for local authorities and other organisations to understand what sports facility provision is required in their area. The guidance explains how to carry out robust, evidence-based assessments of both indoor and outdoor sports facilities, ensuring decisions align with the NPPF requirement for clear assessments of need.

Securing developer contributions for Education, (Department for Education, 2019)¹¹

2.33. This document outlines the Governments aims to enable Local Education Authorities (LEA's) to request S106 monies in relation to development that may have an impact on education provision in the local area. The document notes that the Government have removed the 'pooling' restriction associated with CIL and that LEA's in conjunction with the respective local planning authority should develop robust charging schedules in order to mitigate the impact of new development. The note states that any contributions should be based upon the following principles:

- Housing development should mitigate its impact on community infrastructure, including schools;
- Pupil yield factors should be based on up-to-date evidence from recent housing developments;
- Developer contributions towards new school places should provide both funding for construction and land where applicable, subject to viability assessment when strategic plans are prepared and using up-to-date cost information; and
- The early delivery of new schools within strategic developments should be supported where it would not undermine the viability of the school, or of existing schools in the area.

2.34. The document notes that it is not intended to replace local approaches which often provide detail on:

- The approach to seeking contributions for education from affordable housing.
- Types/ sizes of homes that will be excluded from calculations of developer contributions.
- Education projects developer contributions may fund. The minimum viable size of new schools.
- Assumptions about the schools children from a development will attend, when assessing available capacity in affected

¹¹ Available at:

https://assets.publishing.service.gov.uk/media/64d0f70d7a5708001314485f/Securing_Developer_Contributions_for_Education.pdf

schools.

- Minimum surplus capacity to allow for fluctuations in demand and parental choice, not counted as available when calculating developer contributions.
- Contributions 'in kind' (land and/or construction).
- Requirements on size and suitability of school sites, including checklists, exemplar layouts and facility specifications.
- Standard planning obligation clauses.

2.35. As local approaches to securing developer contributions for education are reviewed, they should take account of updated Planning Practice Guidance, this guidance, and the Department's national methodology for the calculation of pupil yields from housing development.

Greater Manchester Context

Greater Manchester Strategy (2025)

- 2.36. The vision for the Greater Manchester Strategy¹² is to create a thriving city region where everyone can live a good life, with a focus on: healthy homes for all; safe and strong communities; a transport system for a global city region; a clear line of sight to high quality jobs; everyday support in every neighbourhood; a great place to do business and digitally connected places and people.
- 2.37. In terms of communities specifically, the Strategy sets out a vision for communities where everyone can live a good life, ensuring that all people and places share the benefits of growth, with a strong focus on tackling inequalities by improving the foundations of daily life such as housing, safety, mobility, opportunity and support.

Places for Everyone

- 2.38. The Places for Everyone (PfE) Joint Development Plan Document (DPD)¹³, 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. The relationship between PfE and the Oldham Local Plan: Publication Plan is explained in the Setting the Scene Topic Paper.
- 2.39. The most relevant PfE policies relating to Communities include:
- *Policy JP-P1 Sustainable Places* – which sets out that all development, where appropriate, should be socially inclusive, well-connected to other places, particularly by public transport and digital infrastructure enabling everyone to take advantage of the employment, cultural and leisure opportunities, incorporate high quality and well managed green infrastructure with opportunities for recreation and outdoor play; and be well-

¹² Available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/greater-manchester-strategy/>

¹³ Available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/>

served by local shops, services and amenities, including education and health facilities;

- *Policy JP-P3 Cultural Facilities* – which sets out that PfE will proactively develop and support cultural businesses and attractions in our cities and towns through a range of measures including, protecting existing heritage, cultural and community venues, facilities and uses and supporting new cultural venues in town centres and places with good public transport connectivity;
- *Policy JP-P5 Education, Skills and Knowledge* – which sets out that significant enhancements in education, skills and knowledge to benefit existing and new residents will be promoted, including by, enabling the delivery of new and improved accessible facilities for all ages, such as early years, schools, further and higher education, and adult training to ensure our workforce is ready to benefit from new employment opportunities and ensuring the delivery of sufficient school places to respond to the demands from new housing, such as through requiring housing developments to make a financial contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate;
- *Policy JP-P6 Health* – which sets out that new development will be required, as far as practicable, to: maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development; support healthy lifestyles, including through the use of active design principles; and be supported by a Health Impact Assessment. It also states that, where appropriate, the provision of new or improved health facilities be provided as part of new developments (that would significantly increase demand) proportionate to the additional demand that they would generate; and
- *Policy JP-P7 Sport and Recreation* – which sets out that a network of high quality and accessible sports and recreation facilities will be protected and enhanced, including by: creating a public realm that provides opportunities for play; setting out more detailed recreational standards and standards for provision for designated play areas in district local plans; requiring new development to provide new and/or improved existing facilities commensurate with the demand they would generate; and locating and designing recreation facilities so that they are accessible to housing.

Greater Manchester Moving in Action 2021-2023 (GMCA)¹⁴

- 2.40. The document sets out Greater Manchester's shared ambition to achieve a major increase in the number of people engaged in physical activity, in line with Sport England's Strategy 'Towards an Active Nation'. To achieve this Greater Manchester will adopt system-wide changes to address health inequalities and build the resilience of local communities.

¹⁴ Available at: <https://www.gmmoving.co.uk/about/our-strategy/>

- 2.41. It notes that the increasing physical activity is key to fostering social inclusion, contributing to the Covid-19 recovery, reducing health and economic inequalities, and contributing to environmental sustainability.
- 2.42. It states that the design and layout of places across Greater Manchester play a vital role in how active people are. In the future, planners, urban designers, developers, transport planners, housing associations and health professionals will help to design and create environments which help people get more active, more often.

Improving Health and Care in Greater Manchester 2023-2028 (2023, GMICP)¹⁵

- 2.43. The Strategy aims to close the gap between Greater Manchester and England by raising population health outcomes. The plan sets out 4 targets:
1. Everyone has an opportunity to live a good life.
 2. Everyone has improved health and wellbeing.
 3. Everyone experiences high quality care and support where and when they need it.
 4. Health and care services are integrated and sustainable.

¹⁵ Available at: <https://gmintegratedcare.org.uk/wp-content/uploads/2023/04/gm-icp-strategy-190423.pdf>

Local Context

- 2.44. 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 communities.

The Oldham Plan

- 2.45. The Oldham Plan 2024-2030 Pride, Progress and Partnership¹⁶ sets out three clear missions to achieve by 2030 to deliver real improvements to the lives of Oldham people:
- Healthier, Happier Lives – building a community where everyone has access to the care, support and opportunities they need to live a good life. We are committed to tackling poverty, improving health and wellbeing, providing high-quality social care and promoting lifelong learning.
 - Great Place to Live – providing more affordable, quality homes, improving public spaces, and creating a strong local economy with vibrant communities that get on well.
 - Green & Growing – making Oldham a place where economic growth benefits all residents, creating opportunities for businesses to succeed while ensuring our community and environment thrive. By attracting new investment, supporting local businesses, and leading in green technologies, we will generate quality job opportunities and equip people with the skills they need to succeed.

Oldham Council Corporate Plan

- 2.46. Oldham Council's Corporate Plan (2024-2027)¹⁷ 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.
- 2.47. Specifically, in relation to communities the plan aims to ensure that:
- Oldham will have a world-class learning environment where all our schools, colleges and other learning centres provide good opportunities for Oldhamers to reach their full potential.
 - More Oldham people will actively engage in sports and physical activity.
 - Communities and families will feel more supported and empowered with services available in their communities through family hubs.

¹⁶ The Oldham Plan is available at:
https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan

¹⁷ The Corporate Plan is available at:
https://www.oldham.gov.uk/downloads/file/8094/oldham_corporate_plan_ready_for_the_future

Building a Better Oldham

- 2.48. Building a Better Oldham¹⁸ 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.
- 2.49. In terms of communities, Building a Better Oldham will provide opportunities to learn and gain new skills, ensure Oldham is the greenest borough and aims to improve life-chances, health and well-being of our residents and local communities.

Oldham's Green Infrastructure Strategy and Open Space Study (2022)

- 2.50. The Green Infrastructure Strategy¹⁹ provides an up-to-date assessment of current Green Infrastructure provision and identifies future enhancement opportunities. It identifies seven priority themes for Oldham's Green Infrastructure, such as:
1. thriving wildlife for Oldham;
 2. carbon neutral Oldham;
 3. healthy and active communities;
 4. green access for all;
 5. distinctive landscapes;
 6. slowing the flow and a quality water environment; and
 7. sustainable growth and green jobs.
- 2.51. Utilising spatial data, the Strategy highlights place-based opportunities aligned to local need and each of the priority themes and can be used to guide development decisions. These are shown on the Green Infrastructure Network and Opportunity Maps²⁰ - a web map is also available online²¹.
- 2.52. The Strategy also sets out a step-by-step guide as to how to implement the strategy when considering a development proposal.
- 2.53. As part of the Strategy, an Open Space Study (2022)²² was carried out which assessed current provision of open space, sport and recreation within the borough and identified future needs related to each type of provision. Further information is provided in the evidence base section below.

¹⁸ 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.

¹⁹ Oldham's Green Infrastructure Strategy (2022) and supporting document is available at:

https://www.oldham.gov.uk/downloads/download/2183/oldham_green_infrastructure_strategy

²⁰ Available at:

https://www.oldham.gov.uk/downloads/download/2183/oldham_green_infrastructure_strategy

²¹ Oldham Green Infrastructure Web Map:

<https://map.oldham.gov.uk/map?name=Green%20Infrastructure>

²² Oldham Open Space Study (2022) available at:

https://www.oldham.gov.uk/downloads/download/2184/open_space_study_documents_2022

Oldham Playing Pitch and Outdoor Sports Strategy (2025)

- 2.54. In April 2025 Oldham's Playing Pitch and Outdoor Sports Strategy (PPOSS) was published²³. The PPOSS updates the previous (2015) Strategy and builds on the assessment of outdoor sports facilities undertaken within the Open Space Study (2022).
- 2.55. The PPOSS provides a more in-depth assessment of the borough's pitches and outdoor sports sites, identifies the current and future needs for particular sports and sets out an Action Plan for future investment and improvement.
- 2.56. The PPOSS provides evidence to support the implementation of existing local planning policies, has informed planning policy within the Publication Plan and will be a material consideration in the determination of planning applications. The PPOSS will also inform S106 developer contributions.
- 2.57. The preparation of the PPOSS has followed five stages, as recommended by Sport England, including an assessment of supply and demand. The assessment of supply and demand was undertaken over 2023-2024. Where possible, sports were assessed in the season in which they are played (i.e. Summer/ Winter). The Assessment Report²⁴ provides further detail on the context/ background to the PPOSS, the supply and demand assessment process and the sport-by-sport supply and demand findings.
- 2.58. The main findings from the supply and demand assessment are that:
- There are shortfalls for sports played on natural turf grass pitches (football, rugby, cricket).
 - There is a clear need to protect all existing playing pitch provision, in line with planning policy.
 - Demand is being met in the main for non-turf/ pitch sports (e.g. tennis, bowls, netball, athletics). However, this does not equate to a surplus of provision - any spare capacity should be considered as a solution to overcome identified shortfalls.
 - Most of the identified grass pitch shortfalls can be met by better utilising current provision - improving quality, additional sports lighting, improving ancillary facilities, increasing match play on 3G pitches, and enabling access to existing unused provision (e.g. unavailable school sites).
 - This means that new grass pitches are not generally required, although such a need will increase if other methods of reducing deficits are not possible.
 - Despite this, there is a clear quantified shortfall of 3G pitches (mainly for training) that can only be rectified through the installation of new facilities. This could also alleviate turf pitch issues.

²³ Oldham's PPOSS (2025):

https://www.oldham.gov.uk/info/201236/evidence/3270/playing_pitch_and_outdoor_sports_strategy_2025

²⁴ PPOSS Assessment Report:

https://www.oldham.gov.uk/downloads/file/8145/oldham_pposs_assessment_report

- 2.59. The Assessment findings underpin the Strategy²⁵ and Action Plan²⁶ documents.
- 2.60. The Strategy and Action Plan provide a clear, strategic framework for the maintenance and improvement of existing playing pitch and accompanying ancillary facilities up to 2041 (in line with the Local Plan review). It has been developed to provide:
- Evidence of supply and demand of playing pitch and outdoor sports provision.
 - A vision for the future improvement and prioritisation of playing pitches and outdoor sports facilities.
 - Aims to help deliver the recommendations and actions – based around the notions of ‘protect’, ‘enhance’ and ‘provide’.
 - A series of strategic recommendations which provide a framework for the improvement, maintenance, development and, as appropriate, rationalisation of the playing pitch and outdoor sport facility stock.
 - A series of sport-by-sport recommendations which provide a strategic framework for sport led improvements to provision.
 - A prioritised area-by-area Action Plan to address key issues on a site-by-site basis.
- 2.61. The site-by-site action plan seeks to address key issues identified in the Supply and Demand Assessment and Strategy. It provides actions based on current levels of usage, quality and future demand, as well as the potential of each site for enhancement. It is organised by Analysis Area (North, South, East, West and Central) and includes information on expected timescales, costs, partners, priority etc. Each action is linked to one or more of the Strategy Aims (protect, enhance, provide) and Strategic Recommendations.

Oldham Health and Wellbeing Strategy 2022-2030

- 2.62. The vision of the Strategy²⁷ is that Oldham residents are happier and healthier, they feel safe, supported and they thrive in this vibrant and diverse borough. The ambition is that people lead longer, healthier, and happier lives, and the gap in health outcomes between different groups and communities in Oldham, and between Oldham and England, is reduced. A demonstrable difference will be made to the average life expectancy and average healthy life expectancy of residents, and inequalities will be reduced.
- 2.63. Goals are set within the Strategy including:
- Infant mortality will decrease so that the rate in Oldham is the same as for England as a whole (the gap was 2.3% in 2018-20).

²⁵ PPOSS Strategy Report:

https://www.oldham.gov.uk/downloads/file/8146/oldham_pposs_strategy_report

²⁶ PPOSS Action Plan: https://www.oldham.gov.uk/downloads/file/8144/oldham_pposs_action_plan

²⁷ Oldham Health and Wellbeing Strategy (2022-2030), available at:
<https://committees.oldham.gov.uk/documents/s136004/ITEM%2010%20-%20health%20and%20wellbeing%20strategy.pdf>

- Oldham will have the same percentage of children achieve a good level of development at the end of reception as in England as a whole (the difference between Oldham and England was 3.7% in 2018/19).
- The percentage of people reporting high levels of anxiety will be smaller than the England average (this affected 24.7% of people in Oldham, and 24.2% in England as a whole in 2020/21).
- The percentage of people who feel lonely will be significantly smaller than the national average (19.5% of people in Oldham reported loneliness in 2019/20, and 22.3% in England).
- Oldham will have the same percentage of physically active adults as England as a whole (the gap was 6.3% in 2022).

Oldham Integrated Care Partnership Strategy (2023-2027)

- 2.64. Oldham Integrated Care Partnership brings together the borough's statutory health and care organisations, the local voluntary, community, faith and enterprise sector, Healthwatch Oldham, and clinical and care professional leads, with the aim of working together to improve local services for residents.
- 2.65. The strategy outlines the vision, principles, priorities and direction for the Partnership. It describes our strategic ambition for our local health and care system, how we will address challenges, and the outcomes we seek to achieve. The strategy is intended to act as a 'refresh' of the borough's 'Locality Plan for Health and Care Transformation'²⁸, whilst providing a cohesive and up-to-date strategic context and framework that all partner organisations can collaboratively work to.
- 2.66. The Strategy repeats the intentions to transform health and care in Oldham as set out in the 2019 Locality Plan to:
 - Put patients, neighbourhoods and communities at the heart of local health and care
 - Focus on prevention via population health management and 'early help and intervention' strategies
 - Measure health and care service success in relation to real outcomes
 - Deliver transformation and change via a partnership model
 - Gain local benefit from the Greater Manchester public sector devolution mode

Oldham Education Provision Strategy (2020-2024)²⁹

- 2.67. The strategic document provides the context and policy for the provision of education places for children and young people, including those with Special Educational Needs and Disabilities (SEND). Oldham Council also has a SEND and

²⁸ Available at:

[https://committees.oldham.gov.uk/documents/s110675/Oldham%20Locality%20HSC%20Plan 191128 DRAFT%20FOR%20APPROVAL%20CPB.pdf](https://committees.oldham.gov.uk/documents/s110675/Oldham%20Locality%20HSC%20Plan%20191128%20DRAFT%20FOR%20APPROVAL%20CPB.pdf)

²⁹ Available at:

<https://committees.oldham.gov.uk/documents/s118577/Education%20Provision%20Strategy%20Document%202020-24%20Final%20Version%20Appendix%20One.pdf>

Inclusion Strategy (2023-2027) which sets out strategic actions to improve outcomes for children and young people so that they have the best possible experiences and opportunities to equip them for their future.

3. Issues, challenges and opportunities relating to Communities

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

Open Space, Sport and Recreation Provision

Issues to be addressed

- 3.2. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities and facilitate social interaction and inclusion. Oldham's Joint Strategic Needs Assessment (JSNA) (2024) identified that in Oldham, 19.1% of people use outdoor space for exercise or health reasons. This is above the average rate across England of 17.9% (March 2015- February 2016). However, only 58.5% of adults in Oldham are physically active, compared to 67.4% across England (2023/24).
- 3.3. Unhealthy behaviours and the presence of multiple long-term conditions are also overrepresented among Oldham's most disadvantaged communities. Oldham has had a consistently higher proportion of adults classified as overweight or obese compared to the national average. The latest figures highlight that 71.3% of adults in Oldham are classified as overweight or obese. This is higher than the England average of 64.5% (2023/2024)³⁰. There are also issues with child health within Oldham – 22.1% of reception aged children are overweight or obese, this is similar to the England rate of 21.1%. Also, 38.6% of year 6 aged children are overweight or obese, this is higher than the England rate of 35.8% (2023/24)³¹. In Oldham, the higher prevalence of obesity tends to be in the most deprived areas.
- 3.4. Physical inactivity is the fourth leading risk factor for global mortality and accounts for 6% of deaths worldwide. People who have a physically active lifestyle have a 20-35% lower risk of cardiovascular disease, coronary heart disease and stroke. Regular physical activity is also associated with a reduced risk of:
- diabetes;
 - obesity;
 - osteoporosis;
 - colon / breast cancer;
 - and improved mental health.
- 3.5. Improved access to high quality open spaces can lead to increased participation in sport and physical activity and in turn lead to increased activity and improved health and well-being.
- 3.6. Oldham also has an ageing population. There are many benefits of older adults engaging in physical activity, including lower risk of developing a long-term health

³⁰ Oldham's JSNA (2024).

³¹ Oldham's JSNA (2024).

condition, reduced risk of mental illness/ cognitive decline, maintaining ability to carry out the tasks of daily life, reduced risk of falls, improved mood and self-esteem and fostering social interaction and countering loneliness. As such there is a need to support older people in terms of staying active, and access to open space provision plays an important role in enabling this.

- 3.7. Protecting open spaces and improving the extent and quality of open spaces can have a direct positive impact on the wider green infrastructure network. Open spaces form a key component of the borough's green infrastructure network. Supporting the protection and improvement of the borough's green infrastructure network can have many multi-functional benefits for health and wellbeing, landscape, sense of place/ local pride and also climate change in terms of improving air quality, reducing flood risk (through increasing flood storage and resilience), and sequestering carbon.
- 3.8. Oldham's population is expected to increase over the plan period. There is a need to meet local housing needs and provide employment land to support the future growth of the borough. In this context, open spaces may become under pressure for development, as suitable land for development becomes finite. As such there is a need to ensure that planning policies support the enhancement of open space under threat from increasing development pressures and decreasing maintenance budgets for open space provision, recognising their important contribution to health and wellbeing and the wider green infrastructure network.

Local Evidence

- 3.9. As set out in section 2, an updated Open Space Study was published in 2022.
- 3.10. The Study comprised an assessment of the quantity, accessibility, quality and value of Oldham's open spaces³². The following open space typologies were not included in the site audits, for the reasons set out below:
- sites smaller than 0.2 ha (except for Provision for Children and Young People). Smaller sites have limited usage compared to larger sites and have limited multi-functionality (however it is recognised they may serve some quantitative/ landscaping function);
 - sites larger than 10 ha as these sites are too large to record accurate information;
 - indoor sports facilities as these are not freely accessible;
 - outdoor spaces associated with education sites as these are also not publicly accessible; and
 - inaccessible or 'land-locked' sites.
- 3.11. The Study identified open space deficiencies based on current (2021) and anticipated future needs up to 2039³³ based on population projections.

³² Appendix C of the Open Space Study (2022) provides the full breakdown of the open space site assessment data, available at:

https://www.oldham.gov.uk/downloads/download/2184/open_space_study_documents_2022.

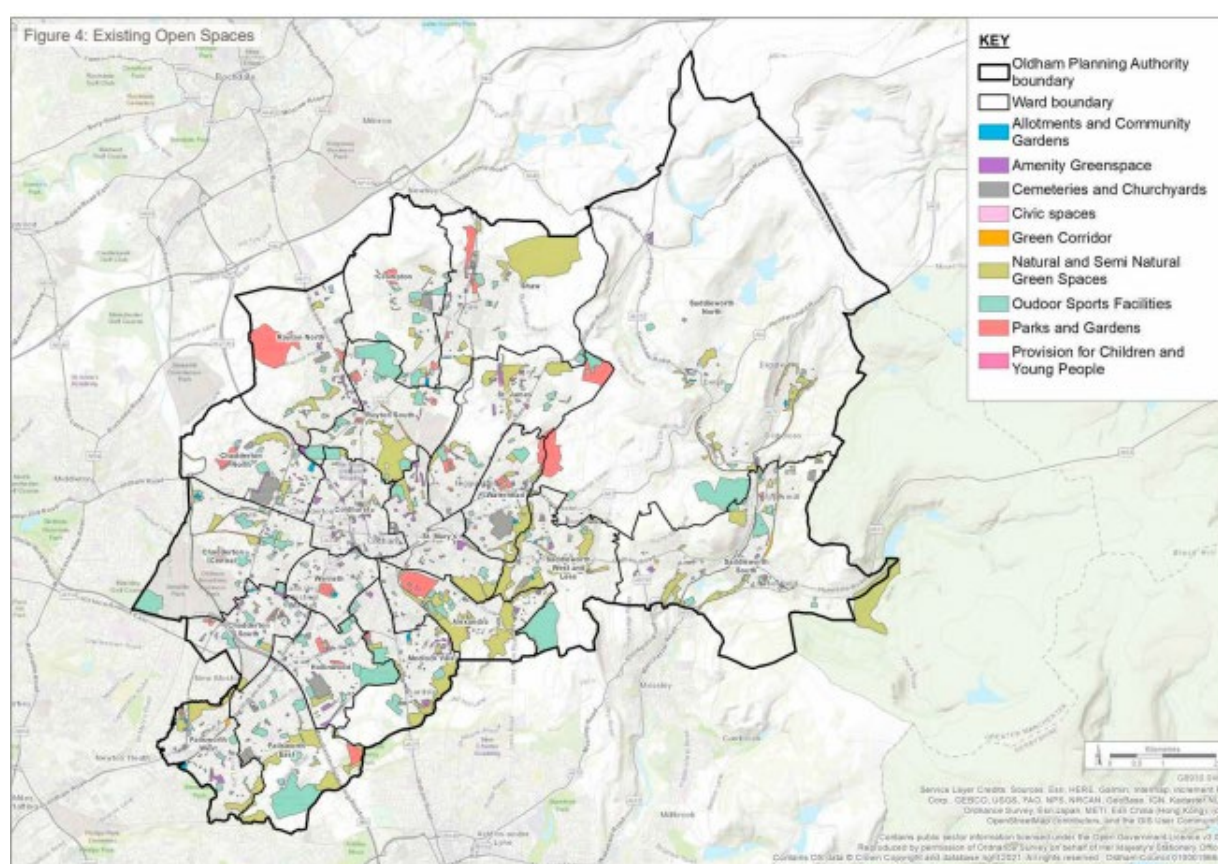
³³ At the time the Open Space Study (2022) was prepared the anticipated Local Plan period was up to 2037 (in line with the PfE Publication Plan 2021). Modifications presented during the Examination in

- 3.12. The study set out recommended standards for quantity, accessibility, quality and value, based on national benchmarks and guidance for provision of open space³⁴. In some instances, due to the nature and characteristics of some types of open space provision it was considered that it was not appropriate to set a standard (for example for cemeteries and churchyards).

Quantity of Open Space

- 3.13. The Study identified that there were 1,159 open space sites with a total area of 1,578 hectares (ha) within the borough. Figure 1 below shows the identified open spaces.
- 3.14. The current population of Oldham is estimated at 238,984 people (as of 2021), as such the amount of open space equates to 6.61 hectares per 1,000 population. In 2037, Oldham's population is projected to increase to 254,829 people.

Figure 1: Oldham's Open Spaces³⁵



- 3.15. Natural and semi-natural open space accounts for the majority of the boroughs open space provision - 42.33% of the total open space provision – whilst provision for children and young people accounts for the least – 0.74% of the total open space

Public of PfE resulted in a change to the PfE plan period to 2039. In any case, the Study represents a comprehensive assessment of open space needs, capable of informing the new Local Plan. Updated evidence will be undertaken as necessary over the lifetime of the Local Plan.

³⁴ See section 7 'Setting Standards' of the Open Space Study (2022) for further information on the identification of the open space standards.

³⁵ Adapted from Oldham's Green Infrastructure Strategy (2022), 'figure 4', page 13. Source: Oldham's Open Space Study (2022).

provision. The amount of provision identified within each typology (type) of open space provision is set out within Table 1 below.

Table 1: Open space provision, by typology, within the borough³⁶

Open Space Typology	Description	Number of sites	Current amount of provision (ha)
Allotments and Community Gardens	Opportunities for those people who wish to do so to grow their own produce as part of the long-term promotion of sustainability, health and social inclusion.	36	14.93
Amenity Greenspace	Most commonly but not exclusively found in housing areas. Includes informal recreation green spaces and village greens.	383	90.14
Cemeteries and Churchyards	Cemeteries and churchyards including disused churchyards and other burial grounds.	78	83.94
Civic Spaces	Hard surfaced areas usually located within town or city centres.	22	2.18
Green Corridors	Linear natural infrastructure, such as trees and plants, that link up other green and open spaces to form a green urban network.	26	38.07
Natural and Semi-natural Greenspace	Includes country parks, nature reserves, publicly accessible woodlands, urban forestry, scrub, grasslands, wetlands and wastelands.	217	667.97
Outdoor Sports Facilities	Usually in the form of pitches or other sports provision, such as football, rugby or cricket pitches as well as tennis courts or bowling greens.	253	478.81
Parks and Gardens	Includes urban parks and formal gardens. Parks usually contain a variety of facilities and may have one of more of the other types of open space within them.	49	192.52
Provision for Children and Young People	Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, multi-use games areas and skateboard parks.	95	9.54
Total provision			1,578.09

³⁶ Appendix F of the Open Space Study (2022) provides a breakdown of open space typologies borough-wide and by ward, available at: https://www.oldham.gov.uk/downloads/download/2184/open_space_study_documents_2022

- 3.16. In terms of the quantity of open space provision, the Study proposed a quantity standard based on a review of existing open space provision and using best practice guidance.
- 3.17. The Study then assessed the current levels of open space provision and expected future levels of provision, against the recommended standard to determine whether there were any open space deficiencies in terms of quantity occurring now or likely to occur in the future. Table 2 sets out the levels of provision (current and future) against the recommended quantity standard.

Table 2: Quantity of Open Space provision compared to proposed standard

Open Space Typology	Existing provision (ha/1,000 population)	Proposed Quantity Standard (ha/1,000 population)	Current (2021) Surplus/ Deficiency (ha)	Future (2037) Surplus/ Deficiency (ha)
Allotments and Community Gardens	0.06	No standard	n/a	n/a
Amenity Greenspace	0.38	0.46	-0.08	-0.11
Cemeteries and Churchyards	0.35	No standard	n/a	n/a
Civic Spaces	0.01	No standard	n/a	n/a
Green Corridors	0.16	No standard	n/a	n/a
Natural and Semi-natural Greenspace	2.80	1.95	0.85	0.67
Outdoor Sports Facilities	2.00	1.35	0.65	0.53
Parks and Gardens	0.81	0.4	0.41	0.36
Provision for Children and Young People	0.04	0.25	-0.21	-0.21

- 3.18. It was found that there is a deficiency within the current and future quantity of open space provision for amenity greenspace and provision for children and young people. Indeed, there is expected to be a decrease in all types of provision per 1,000 population over the next 15 years, as population is expected to increase by around 6.36%.

Accessibility to Open Space

- 3.19. The Study assessed access to open space and identified a proposed open space standard. The Study assessed that it was appropriate to retain the open space accessibility standard, as was proposed within the previous Open Space Study (2006 and 2010) (and set out within Policy 23 of the Core Strategy and Joint DPD, 2012), as it was considered to still represent an appropriate measure and reflect the needs of the community.
- 3.20. The accessibility standard proposed is shown within Table 3.

Table 3: Proposed Open Space Accessibility Standard

Open Space Typology	Proposed Accessibility Standard
Allotments and Community Gardens	No standard
Amenity Greenspace	720 metres (approx. 15 minute walk)
Cemeteries and Churchyards	No standard
Civic Spaces	No standard
Green Corridors	No standard
Natural and Semi-natural Greenspace	Natural and Semi-natural) - 720 metres (approx. 15 minute walk) Strategic Natural and Semi-Natural over 20ha - 7.85km (approx. 20 minute drive)
Outdoor Sports Facilities	Outdoor Sport Facilities (Excluding Golf Courses) - 720 metres (approx. 15 minute walk) Golf courses - 12.63km (approx. 20 minute drive)
Parks and Gardens	Local Parks and Gardens - 720 metres (approx. 15 minute walk) Strategic Parks and Gardens of 15ha and above - 7.85km (approx. 20 minute drive)
Provision for Children and Young People	480 metres (approx. 10 minute walk)

- 3.21. To assess the accessibility to the borough's current open space provision against the proposed standard, accessibility maps were produced for each typology of open space. These are available to view online³⁷. A full explanation of the findings of the accessibility assessment are provided within section 5 of the Open Space Study.
- 3.22. The maps identified that there was good access to amenity greenspace in general across the borough, however there were gaps in access to provision within parts of Shaw and Saddleworth North and Saddleworth South particularly.
- 3.23. In terms of access to parks and gardens the maps show that there is fair access across the borough, however there are particular gaps in parts of Coldhurst, Shaw, Medlock Vale, Failsworth East, Failsworth West, Saddleworth West and Lees, Saddleworth North and Saddleworth South.
- 3.24. In terms of provision for children and young people, the maps identified that there was generally less coverage of sites across the borough, with inner Oldham having greatest access and the outer wards, in particular Saddleworth North and South wards, having more limited access.

³⁷ Open Space Accessibility Maps (by typology):
https://www.oldham.gov.uk/downloads/download/2184/open_space_study_documents_2022

- 3.25. For access to outdoor sports facilities, there was generally good access across the borough, however there were gaps in provision for parts of Royton North, Shaw and Saddleworth North and South.
- 3.26. Similarly access to natural/ semi-natural space was generally good across the borough. There were less gaps in access to this type of provision compared to any other open space typology, however there were some smaller gaps in provision within Saddleworth North and Saddleworth South in particular.
- 3.27. In general, there is good access to open space across the borough, however some typologies are more accessible than others e.g. there are distinct gaps in provision for children and young people and parks and gardens, whilst there is extensive provision of outdoor sports facilities and natural/semi-natural spaces. This generally reflects that formal provision such as that for children and young people and parks and gardens is less common than more natural types of provision such as natural/ semi-natural. It also reflects the general size of provision, whereby outdoor sports facilities and natural/semi-natural spaces can be large in size compared to provision for children and young people.
- 3.28. The accessibility findings also reflects the topography and landscape of the borough as eastern and northern parts of Shaw and western and north parts of Saddleworth, and to a lesser extent northern parts of Royton North, southern parts of Medlock Vale and southern parts of Failsworth East and West, where there are distinct gaps in several typologies of open space provision, are areas which are more rural in nature, have extensive amounts of agricultural land, include open moorland and/or have undulating topography. In these areas, access to formal open space provision may be limited however generally these areas have better access to countryside sites (such as Tandle Hill, Crompton Moor and Daisy Nook) or open countryside and moorland (including the Peak District National Park) where there is an extensive Public Right of Way network.

Quality of Open Space

- 3.29. The proposed quality standard for open space is based on the Green Flag Award criteria (used to complete the quality audits). There are 8 Green Flag Award Assessment criteria, however for the purposes of Oldham's Open Space Study, the criteria of 'A Welcoming Place', 'Healthy, Safe and Secure' and 'Well Maintained', were used to assess each site audited. 'A Welcoming Place' assesses the signage, accessibility for a wide range of visitors, entrance presentation and the maintenance and definition of boundaries. 'Healthy, Safe and Secure' takes into consideration the safety and security of facilities, shelter from the weather, lighting and clear sightlines. 'Well Maintained' considers the overall cleanliness of the site and the soft and hard landscaping features present.
- 3.30. The assessment bandings used were as follows:
- Excellent - 90% to 100%
 - Very Good - 80% to 89%
 - Good - 70% to 79%
 - Fair - 50% to 69%
 - Poor - 0% to 49%

- 3.31. The standard proposed that all open space typologies should meet a quality score of 70% and above (good). It was considered that due to the nature of provision, the quality standard was not appropriate to apply to allotments and community gardens, cemeteries and churchyards and civic space, however these sites were still assessed for quality, as improvements may still be beneficial.
- 3.32. A total of 455 sites were assessed for quality. A detailed explanation of the quality findings is provided within section 5 of the Open Space Study.
- 3.33. The Study found that the majority of the borough's open spaces (56.7%) met the proposed quality standard of 70% (8.55% scored 'excellent', 18.46% scored 'very good' and 29.67% scored 'good'). Table 4 sets out the quality assessment findings by open space typology.

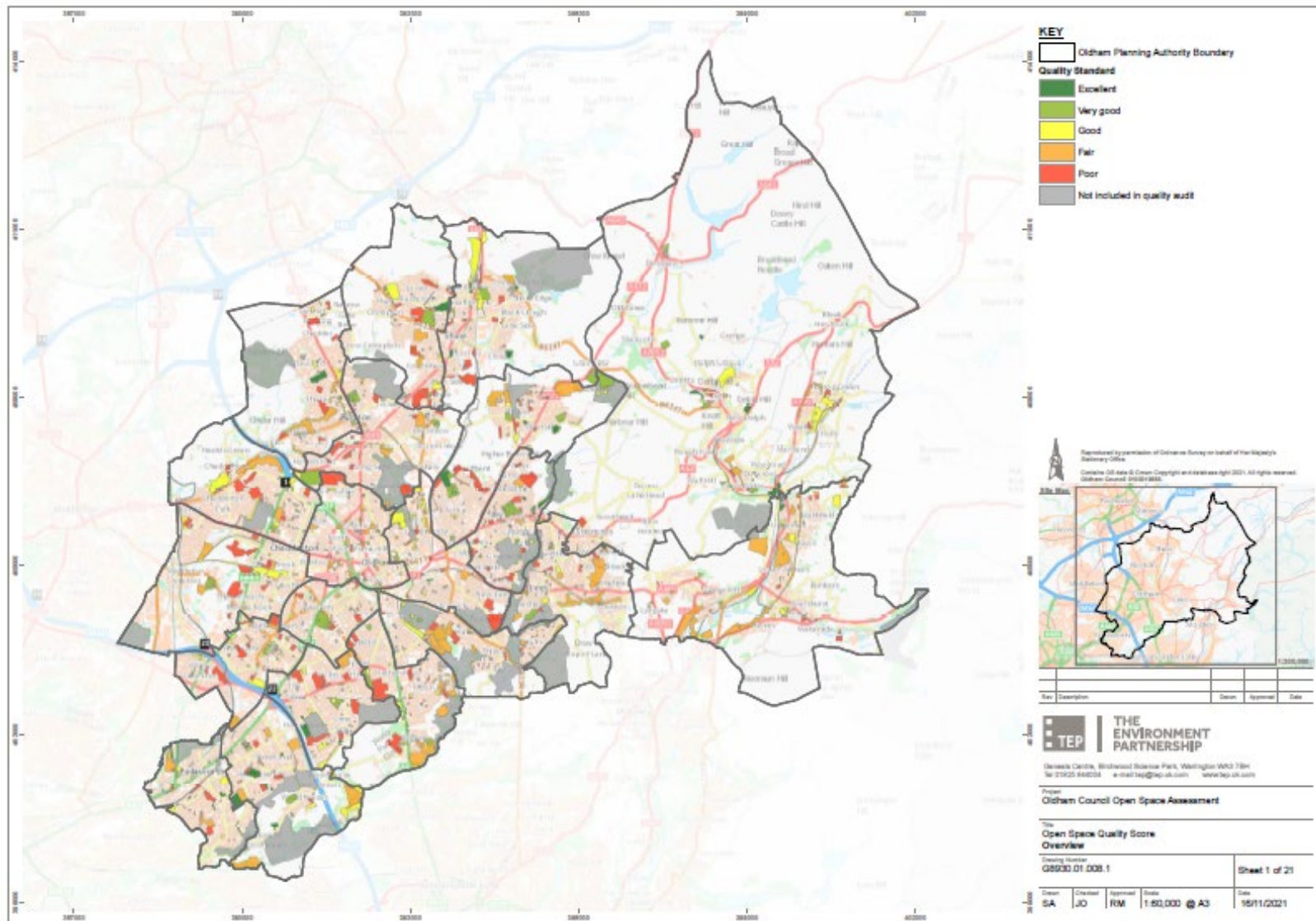
Table 4 Open Space Quality by Typology

Open Space Typology	Excellent Quality	Very Good Quality	Good Quality	Fair Quality	Poor Quality	Total Sites
Allotments and Community Gardens	0	0	2	0	0	2
Amenity Greenspace	7	29	43	45	5	129
Cemeteries and Churchyards	9	14	10	5	2	40
Civic Spaces	0	2	2	1	0	5
Green Corridors	0	1	1	16	2	20
Natural and Semi-natural Greenspace	8	7	29	72	20	136
Outdoor Sports Facilities	13	15	24	20	5	76
Parks and Gardens	1	9	21	2	1	34
Provision for Children and Young People	1	7	3	1	0	12
Total sites	39	84	135	162	35	455

- 3.34. As shown in Table 4, the majority of open space provision is scored as good or fair quality. However, there are deficiencies in terms of quality, such as the majority of green corridors and natural/semi-natural open space does not meet the proposed quality standard (90% of green corridors are scored as fair or poor quality and 68% of natural/semi-natural spaces are scored as fair or poor quality).

- 3.35. Figure 2 shows the location of open spaces by their quality score. It shows that in many instances larger open spaces are not scored as highly in terms of quality compared to smaller open spaces. This could reflect that larger spaces require more budget to maintain compared to smaller sites, given their size or due to the type of maintenance/ investment required and the cost associated with it.

Figure 2: Open Spaces by Quality



Value of Open Space

- 3.36. An assessment of 'value' was also carried out on the borough's open spaces as part of the Study. Open space value is closely linked to quality and is an additional measure of functionality and usage by communities.
- 3.37. Sites were assessed against several value criteria including, context, historical/heritage, contribution to local amenity, vitality and Sense of Place, recreation, play, ecological and biodiversity. The assessment scored sites as 'high (60-100%)', 'medium (40-59%)' and 'low (0-39%)' based on the value criteria.
- 3.38. The Study recommended that a value standard of 60-100% (high value) be applied for destination or flagship sites and a standard of 40-50% (medium value) be applied for all other open space sites. The value standard ensures that the borough's open spaces are meaningful and beneficial to the local community. It ensures locally important, or flagship open spaces, are protected and that investment towards existing provision is focused where it is most needed.
- 3.39. The Council will advise in terms of identifying flagship/ destination sites, however in summary these are open space sites which could be of significant importance to the borough in terms of tourism or recreational use. They are open spaces which people may visit for an extended period of time. For Oldham, examples include Alexandra Park and Waterhead Park.
- 3.40. Table 5 shows the value scores by typology. The value assessment found that 41.7% of sites were high value, 31.6% were medium value and 26.5% were low value. The greatest value scores range was for amenity greenspace.

Table 5: Open Space Value Scores by Typology

Open Space Typology	High	Medium	Low
Allotments and Community Gardens	0	0	2
Amenity Greenspace	35	36	58
Cemeteries and Churchyards	14	17	9
Civic Spaces	2	3	0
Green Corridors	12	8	0
Natural and Semi-natural Greenspace	68	41	27
Outdoor Sports Facilities	31	25	21
Parks and Gardens	23	9	2
Provision for Children and Young People	5	5	2
Total sites	190	144	121

Playing pitches, playing fields and outdoor sports facilities

- 3.41. As set out in section 2, the Council's Playing Pitch and Outdoor Sports Strategy (2025) provides updated evidence in relation to the borough's playing pitch and outdoor sports provision.
- 3.42. The PPOSS identifies the current and future needs for particular sports and sets out an Action Plan for future investment and improvement. The PPOSS has considered the needs of several types of sporting provision, including pitches/ courts/ facilities associated with football, rugby, cricket, hockey, netball, golf, athletics, tennis, bowls. It has also considered outdoor provision of multi-use games areas (MUGAs), which can be used for informal sports and recreation.
- 3.43. Building on the PPOSS Assessment, the PPOSS Strategy and Action Plan provide a clear, strategic framework for the maintenance and improvement of existing playing pitches and accompanying ancillary facilities up to 2041.
- 3.44. The Action Plan sets out actions to address key issues identified by the Assessment. It includes information for each identified action on expected timescales (short, medium, long)³⁸, costs (high, medium, low)³⁹, partners (i.e. sports club/ national governing body/ Council), site hierarchy and priority (high, medium, low), as a guide to support delivery of the action.
- 3.45. Site hierarchy is the identification of sites based on their strategic importance in a regional context i.e., they accommodate the majority of demand, or the recommended action has the greatest impact on addressing shortfalls (either on a sport-by-sport basis or across the borough as a whole. The hierarchy is hub sites (high-quality, district important, multi-sport sites), key centres (community/ sport focused, although some are still likely to service a wider analysis area) and local sites (primarily sites with one pitch/facility or a low number of pitches/facilities that service just one or two sports). See PPOSS Action Plan for more information.
- 3.46. Priority is based on strategic importance or the potential impact the action will have on addressing key issues identified by the assessment. High priority actions are usually related to hub sites given their potential reach and impact on sporting needs. Medium priority actions have analysis area importance and are identified on the basis of the impact that they will have on addressing the issues identified in the assessment, although not to the same extent as high priority actions. Low priority actions tend to be for single pitch or single sport sites with local specific importance but that may also contribute to addressing the issues identified in the assessment for specific users. See PPOSS Action Plan for more information.
- 3.47. In terms of delivering the actions in the context of planning policy, the PPOSS Strategy sets out that Sport England's Playing Pitch Calculator (PPC)⁴⁰ should be used to inform contributions towards new or enhanced provision as part of new residential development. Sport England's PPC helps local authorities estimate the demand that may be generated for the use of playing pitches by a new population.

³⁸ Short = 1-2 years; medium = 3-5 years; long = 6+ years.

³⁹ High = 750k and above; medium = £150-£750k; low = less than £150k

⁴⁰ See Sport England Playing Pitch Calculator for further information:

<https://www.sportengland.org/how-we-canhelp/facilities-and-planning/planning-for-sport/playing-pitch-calculator>

- 3.48. Access to the PPC is currently restricted to local authorities with an up-to-date assessment of the need for playing pitches in their area. The Council have access to the Sport England PPC - data from Oldham's PPOSS directly feeds into the calculator to generate the results.
- 3.49. Informed by the outcomes of the PPC, the PPOSS Action Plan should be used to identify potential sites for offsite enhancement or where new provision may be needed, based on the identified deficiencies/ need.

Education and Skills

- 3.50. The JSNA (2024) has identified several issues relating to education and skills in Oldham:
 - In 2024, 55% of pupils met the expected standard at Key Stage 2 (end of Primary) in Reading, Writing and Maths. This is the same as achieved in 2023, but 3% higher than 2022. This compares to 59.3% in statistical neighbours and 61% at a national level. All of these figures represent a substantially lower position compared to those pre-Covid, especially where deprivation is higher.
 - Oldham's average attainment 8 score at the end of Key Stage 4 is 42.4, lower than the England average of 46.1 (2024).
 - In Oldham the proportion of children that have a "Good Level of Development" (GLD) is consistently below that of the England average. The most recent data shows that 63.6% of Oldham children achieved a GLD by the end of reception year, lower than the England average of 67.7% (2023/24).
 - 6% of 16–17-year-olds are not in employment, education or training (or status is unknown), higher than the 5.4% in England (2023/24).
 - Youth Unemployment currently stands at 9.2% (June 2025). Similarly to the general unemployment rate, Oldham is highest in Greater Manchester and has a rate higher than the national average (5.5%).
- 3.51. In addition, whilst Oldham's population is ageing, proportionally the age structure of Oldham is relatively youthful with a high proportion of residents aged under 18 (22.7%). Oldham's age structure is significantly younger than the England average⁴¹.
- 3.52. As such, there is a need to ensure the importance of ensuring access to high-quality education for all residents of Oldham. This could involve supporting the provision of schools, colleges, and other educational institutions that meet the needs of the community. There is also a need to ensure the availability of lifelong learning opportunities to enhance skills and promote continuous education. This could involve supporting initiatives that provide education and training for residents at various stages of life.

⁴¹ JSNA (2024).

- 3.53. Addressing the skills gap and promoting training programs that align with the needs of local industries could be a key aspect of this policy. It may aim to strengthen the connection between education and employment opportunities within the community.
- 3.54. Oldham's Education Provision Strategy (2020-2024) sets out some statistics related to education provision in Oldham. It identifies that there has been a rise in the number of special school places from 780 places in 2015 to 923 in 2018. Between 2015-19 there has been a significant increase in the number of special school places across all primary need categories for SEND. The number of pupils with Autistic Spectrum Disorder (ASD) attending a special school in Oldham has increased by 152% from 2015 to 2019 with 71 pupils attending a special school in 2015, compared to 179 pupils in 2019. The significant increase in places can be attributed to the increase in Education, Health and Care Plans that we have seen from 2015-19 and the sheer demand for children and young people to attend a special school in Oldham.
- 3.55. The Strategy also outlines how an education needs analysis for the borough is undertaken. The analysis is based on the school capacity survey (SCAP), which is a statutory data collection that all local authorities must complete every year. The SCAP is based on data collected in the January Schools Census about: school capacity (i.e. the number of places and pupils in a school), pupil forecasts (i.e. an estimation of how many pupils there will be in future) and capital spend (i.e. the money schools and local authorities spend on their buildings and facilities). The data is used to identify areas where there may not be enough school places and also use projections of pupil numbers to calculate the basic needs funding local authorities receive to provide enough school places to meet future demand.
- 3.56. The SCAP is informed by housing growth and potential identified future development in the borough. A source of this information is the Council's Housing Land Supply (as set out within the Strategic Housing Land Availability Assessment). The information is updated annually, in line with updated housing land supply evidence.
- 3.57. The Strategy identifies variables which may impact future pupil forecasting, including:
- Inward migration has increased for a considerable period of time, it is not known what the impact of the UK leaving the European Union will have. Any changes will be reflected in the annual pupil place forecast completed in July each year. As the Education Funding Agency allocates basic need funding based on this data it is vital that we keep abreast of local and regional changes and adjust forecasts accordingly.
 - Indications are that there will be an increase in the number of large family houses as part of new developments, attracting families with multiple siblings requiring several places in different year groups in the same school. In order to meet this type of demand it is necessary to carry a reasonable level of surplus capacity in order to avoid siblings being split. Every effort will be made to plan provision so that it reflects local need and that a reasonable surplus of places remains in the system.

- 3.58. Therefore, with new residential developments, there is a potential increase in the local population. As such, the Local Plan needs to address the challenge of ensuring that the educational infrastructure keeps pace with population growth to prevent overcrowded schools and inadequate educational facilities. There is a need for continued coordination between residential development planning and the provision of educational facilities. This will ensure that new communities have access to schools, colleges, and other educational resources from the outset.
- 3.59. The Council has a statutory duty under the Education and Inspections Act 1996 to ensure that there are sufficient school places available within the borough to meet the educational needs of the population.

Community Facilities

- 3.60. There is the need for a policy framework to be in place that supports the provision of new cultural, community and health facilities and prevents the premature loss of such important local facilities.
- 3.61. Community facilities within the borough provide for the health and wellbeing, social, educational, spiritual, recreational and leisure and cultural needs of the community. Some serve a local community (e.g., post office), while others serve a wider area. These facilities and services help create supportive communities by meeting day to day needs of residents and businesses, such as:
- Public halls, (including community and youth centres)
 - Post Offices
 - Non-residential education and training facilities
 - Children's nurseries and creches
 - Childcare centres
 - Doctors surgeries, dentists, health centres and clinics, chemists and hospitals
 - Residential care homes and nursing homes
 - Village shops
 - Village pubs
 - Places of worship and church halls
 - Museums, libraries and art galleries
 - Performance spaces
- 3.62. In terms of improving issues affecting communities, community facilities can be lifelines for families, children, young people and older people, enabling them to access health services, care and support. They can also be places for meeting and socialising, fostering integration and social interaction which can improve loneliness and isolation.
- 3.63. Oldham's JSNA (2024) identifies several issues related to communities, as set out below (and in the health and wellbeing section – paragraph 3.69-3.74).

- 3.64. According to the Sport England Active Lives Survey, 8.5% of adults in Oldham feel 'lonely often' or 'always' in 2022/23-2023/24. This is higher than the Greater Manchester, North-West and England averages. Since 2019/20-2020/21 Oldham's rate has increased more than one-quarter from 6.7% to 8.5% (in 2022/23-2023/24)⁴².
- 3.65. There are also issues with infant mortality in Oldham, with levels which are significantly above Greater Manchester, the North-West, and England levels (6.7 per 1,000 births in Oldham compared to 4.1 per 1,000 births nationally). There are several risk factors for infant mortality which include deprivation (families in the most deprived areas face greater risk), health factors and inequalities, and broader determinants of health (such as housing, income, access to care)⁴³. Similar trends are present for child mortality also.
- 3.66. Further data related to communities is provided in the JSNA, and supporting documents.
- 3.67. Oldham Council is committed to place-based integration where public services work collaboratively in place to provide timely and effective support to our residents and communities. Family Hubs have been established across Oldham⁴⁴. The hubs enable and support people in the local community to live independently and to access support at the earliest opportunity as part of the Oldham prevention framework to improve health and well-being and reduce escalation of demand within the public sector.
- 3.68. Online web maps are available which identify several of the borough's community facilities, including family hubs and childcare services⁴⁵.
- 3.69. The Infrastructure Delivery Plan, which supports the Local Plan, provides further information on community facilities in the borough.

Health and Wellbeing

- 3.70. Some issues related to health and wellbeing have been listed above, including issues related to physical activity, obesity in adults and children, infant mortality, mental health in children, and loneliness. In addition to these, there several other issues identified by Oldham's JSNA (2024) and Oldham's Health and Wellbeing Strategy (2022-2030), including:
 - The life expectancy of Oldham's residents is currently below the national average - for men it's 76.6 years compared to the national average of 79.1 and for women it's 80.5 years compared to the national average of 83.1. There is also inequality in life expectancy between the most and least deprived areas of the borough - on average those living in the most deprived areas of Oldham can expect to live shorter lives than those in the least deprived.

⁴² JSNA (2024): <https://www.jsnaoldham.co.uk/ageing-well/social-isolation-loneliness/>

⁴³ JSNA (2024)

⁴⁴ Further information on the borough's Family Hubs can be found online at: <https://familyhubs.oldham.gov.uk/>

⁴⁵ Available at: <https://map.oldham.gov.uk/>

Between Alexandra (most deprived) and Saddleworth South (least deprived) the difference is: 12.7 years for males and 12.8 years for females⁴⁶.

- Oldham's healthy life expectancy⁴⁷ is also significantly lower than the average in England - for men it's 56.6 years (national average of 63.1 years) and for women it's 58.2 years (national average of 63.9 years).
- In Oldham, 2.1% of residents aged 18+ are recorded as having depression. This is higher than the England average of 1.5% (2023/24).
- The percentage of adults in Oldham with a common mental disorder is estimated to be greater than the England average (19.2%, 16.9% respectively).
- More people in Oldham report low happiness (11.3%, compared with 9.2% in England), and high anxiety (24.7% compared with 24.2%).

3.71. In addition, Oldham is also the 11th most deprived Local Authority in England, with 37% of Oldham's LSOAs⁴⁸ within the top 10% most deprived in England. Experiencing deprivation can have a detrimental impact on many areas of life including health and wellbeing. Health is also a determinant of deprivation.

3.72. Oldham's Health and Wellbeing Strategy (2022-2030) sets out the following ambition: *"People to lead longer, healthier, and happier lives, and the gap in health outcomes between different groups and communities in Oldham, and between Oldham and England, is reduced. A demonstrable difference will be made to the average life expectancy and average healthy life expectancy of residents, and inequalities will be reduced."*

3.73. The Council is committed to being resident focussed which also means providing support and care that is as close to, and connected with, homes and community as possible. The health estate must be supported to develop and modernise, or be protected in line with integrated NHS strategies, and planning has a key role in helping to deliver these ambitions, through helping to secure quality and accessible health provision that meets the needs of our local communities.

3.74. It is also important to ensure that the demands placed on health provision are met by new residential development as it comes forward and that a proportionate contribution is made towards funding the healthcare needs. Health Impact Assessments (HIA) can be used to identify the health impacts of a proposed development and can inform its design accordingly.

⁴⁶ Oldham's JSNA (2024).

⁴⁷ Healthy Life Expectancy can be defined as 'a measure of the average number of years a person would expect to live in good health based on contemporary mortality rates and prevalence of self-reported good health', source: <https://www.gov.uk/government/publications/understanding-the-drivers-of-healthy-life-expectancy/understanding-the-drivers-of-healthy-life-expectancy-report>

⁴⁸ Lower Super Output Areas (LSOAs) are made up of groups of Output Areas (OAs), usually four or five. They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons.

4. Communities and the Oldham Local Plan: Publication Plan

- 4.1. This section of the Topic Paper looks at each of the policies contained in the Communities 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 communities;
 - 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 CO1: The Protection of Open Space, Sport and Recreation Provision and Policy CO2: New and Improved Open Space Sport and Recreation Provision

Summary of Evidence

- 4.3. As set out in section 3 above, an updated Open Space Study was published in 2022. The Study (2022) comprised an assessment of the quantity, accessibility, quality and value of Oldham's open spaces. It also identified open space deficiencies based on current (2021) and anticipated future needs (2037) (based on population projections) and set out recommended standards for quantity, accessibility, quality and value, based on national benchmarks and guidance, for the provision of open space.
- 4.4. The Study identified that there were 1,159 open space sites with a total area of 1,578 hectares (ha) within the borough. The current population of Oldham is estimated at 238,984 people (as of 2021), as such the amount of open space equates to 6.61ha per 1,000 population.
- 4.5. Natural and semi-natural open space accounts for the majority of the boroughs open space provision - 42.33% of the total open space provision – whilst provision for children and young people accounts for the least – 0.74% of the total open space provision.
- 4.6. The Study proposed open space standards for quantity, quality, accessibility and value based on a review of existing open space provision and using best practice guidance⁴⁹.
- 4.7. The Study assessed open space provision within the borough against the identified standards. In terms of quantity, the Study found that there is a deficiency within the current (2021) and future (2037) quantity of open space provision for amenity

⁴⁹ A standard was not identified for some types of provision where the type and nature of provision would make it inappropriate or impractical, for example not applying a quantity or accessibility standard to cemeteries and churchyards. In these cases, the provision needs for these types of spaces will be considered separately, as appropriate.

greenspace and provision for children and young people. Indeed, there is expected to be a deficiency in all types of provision over the next 15 years, as population is expected to increase by around 6.36%.

- 4.8. The Study found that the majority of the borough's open spaces (56.7%) met the proposed quality standard of 70%.
- 4.9. In general, the assessment found that there is good access to open space across the borough, however some typologies are more accessible than others e.g. there are distinct gaps in provision for children and young people and parks and gardens, whilst there is extensive provision of outdoor sports facilities and natural/semi-natural spaces.
- 4.10. The Study also assessed sites in terms of their value. Open space value is closely linked to quality and is an additional measure of functionality and usage by communities. The Study recommended that a value standard of 60-100% (high value) be applied for destination or flagship sites and a standard of 40-50% (medium value) be applied for all other open space sites. The value assessment found that 41.7% of sites were high value, 31.6% were medium value and 26.5% were low value. The greatest value scores range was for amenity greenspace.
- 4.11. In addition, in April 2025 Oldham's Playing Pitch and Outdoor Sports Strategy (PPOSS) was published. The PPOSS builds on the assessment of outdoor sports facilities undertaken within the Open Space Study (2022). The PPOSS identifies the current and future needs for particular sports and sets out an Action Plan for future investment and improvement. The PPOSS has considered the needs of several types of sporting provision, including pitches/ courts/ facilities associated with football, rugby, cricket, hockey, netball, golf, athletics, tennis, bowls. It has also considered outdoor provision of multi-use games areas (MUGAs), which can be used for informal sports and recreation.
- 4.12. The main findings from the supply and demand assessment are that there are shortfalls for sports played on natural turf grass pitches, yet demand is being met in the main for non-turf pitch sports. Most of the identified grass pitch shortfalls can be met by better utilising current provision - improving quality, additional sports lighting, improving ancillary facilities, increasing match play on 3G pitches, and enabling access to existing unused provision (e.g. unavailable school sites). This means that new grass pitches are not generally required, although such a need will increase if other methods of reducing deficits are not possible. Despite this, there is a clear quantified shortfall of 3G pitches (mainly for training) that can only be rectified through the installation of new facilities. This could also alleviate turf pitch issues.
- 4.13. There is a clear need to protect all existing playing pitch provision, in line with planning policy.
- 4.14. Building on the Assessment, the PPOSS Strategy and Action Plan provide a clear, strategic framework for the maintenance and improvement of existing playing pitches and accompanying ancillary facilities up to 2041. The Action Plan includes information for each identified action on expected timescales (short, medium, long)⁵⁰, costs (high,

⁵⁰ Short = 1-2 years; medium = 3-5 years; long = 6+ years.

medium, low)⁵¹, partners (i.e. sports club/ national governing body/ Council), site hierarchy and priority (high, medium, low), as a guide to support delivery of the action.

- 4.15. The Action Plan should be used to identify potential sites for offsite enhancement or where new provision may be needed, based on the identified deficiencies/ need.
- 4.16. There are issues with health and well-being, including obesity, physical inactivity and loneliness being experienced in Oldham, as set out in this topic paper. Oldham also has an ageing population. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities and facilitate social interaction and inclusion. Open spaces can also be important to support older people, reducing the risk of long-term health conditions and countering loneliness.
- 4.17. Also, Oldham's population is expected to increase over the plan period and there is a need to meet local housing needs and provide employment land to support the future growth of the borough. In this context, open spaces may become under pressure for development and/ or there will be increasing demand for open spaces and as such there is a need to ensure that open spaces are protected from development, where appropriate.

Draft Local Plan consultation and Duty to Co-operate

- 4.18. At the Draft Plan stage, the open space policies were CO1 Protection of Existing Open Spaces, CO2 New and Enhanced Open Spaces and CO3 Open Space Standards. The policies have now been condensed into two policies in the Publication Plan – CO1 The Protection of Open Space, Sport and Recreation Facilities and CO2 New and Improved Open Space Sport and Recreation Provision.
- 4.19. As part of the Draft Local Plan consultation, several responses were received to policies CO1, CO2 and CO3. The comments received/ issues raised and the Council's response to these issues are summarised in Table 6 below.

⁵¹ High = 750k and above; medium = £150-£750k; low = less than £150k

Table 6: Draft Local Plan Consultation Summary and Response – Community Facilities

Draft Plan Policy	Comment/ Issue Summary	Council Response
CO1	Support the protection of existing open spaces but also highlight that the Local Plan should make provision to remedy deficiencies in greenspace provision, including through land allocation.	Site allocations are not being made through this Local Plan. However, Policy CO2 sets out that the Council will support the enhancement of existing, and the creation of new, open space, sport and recreation provision in the borough. It also requires that major residential developments provide sufficient public open space, sport or recreation provision onsite (or where it is not possible to provide onsite, a financial contribution towards new or enhanced existing offsite public open space, sport or recreation provision will be sought). The policy ensures that new provision or contributions towards existing provision, is determined by local open space needs and deficiencies, as set out in local evidence. It is considered that this policy will help to address deficiencies in provision.
CO1	Welcome the acknowledgement within paragraph 19.1 that open space has a key role to play in enhancing biodiversity of the borough and mitigating against climate change and it is important that this function is not adversely impacted by inappropriate development. This condition could be included within the list of unacceptable circumstances.	It is considered that Policy CO1 is sufficient to ensure the protection of open space. Other policies within the Plan also deal with the protection of greenspace and the enhancement of biodiversity.
CO1	The policy does not offer enough protection for playing fields and conflicts with the aims of the NPPF. Suggest adding wording to reflect the intent of Sport England's Playing Fields Policy Exception E4 and Planning for Sport Objective 'Protect' which requires replacement provision to be accessible to existing and new users within catchment. Any provision to replace lost playing field will be required to be based on local evidence of local need based on the latest assessment of playing	Since the Draft Plan stage, the Oldham Playing Pitch and Outdoor Sports Strategy (2025) has been published. This provides an up-to-date assessment of playing pitch and outdoor sports and recreation provision in Oldham and includes an Action Plan. This has now informed the policy, which sets out that all playing fields, playing pitches and outdoor sports provision will be protected in line with the policy, national planning policy and other relevant policy and guidance. The proposed loss (in whole or part) of a playing field, playing pitch

Draft Plan Policy	Comment/ Issue Summary	Council Response
	field land based on Sport England's PPS Guidance and ANOG and to accord with NPPF.	or outdoor sports provision will be considered on a site-by-site basis, having regard to Oldham's PPOSS (2025), and where appropriate, any loss of provision should be replaced by at least equivalent or improved provision in another location, as agreed by the Council, and relevant sporting bodies.
CO2 and CO3	A standards-based approach to provision of outdoor sports facilities is not supported. The provision of new outdoor sports facilities should be based on the council's latest needs assessments based on Sport England's PPS Guidance and ANOG and to accord with NPPF paragraph 102. Welcomes the facilitation of leisure facilities however their location should be evidenced and based on an up-to-date needs assessment and in accordance with Sport England ANOG approach.	In terms of outdoor sports provision, the policy is now clear that the PPOSS will inform where provision is needed. It does not apply a standards-based approach and instead utilises the up-to-date assessment of needs (and actions) set out in the PPOSS. The PPOSS has been prepared in accordance with Sport England guidance.
CO3	Welcome and support this policy, would refer the council to Building with Nature standards, which can be used to enhance the quality of open greenspace.	The 'Building with Nature' standards are referred to in other parts of the plan including Policy N3 'Enhancing Green Infrastructure through development' and Policy D1 'Achieving High Quality Design'.

- 4.20. There was also general support provided for the policy.
- 4.21. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.22. There are no specific Duty to Cooperate issues associated with this policy. Sport England have been consulted in terms of amending the policy since the Draft Plan stage – a meeting was held to discuss the policy on 26 June 2025.

Policy Approach

Policy CO1 The Protection of Open Space, Sport and Recreation Provision

- 4.23. As the evidence and policy context has shown, access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities and facilitate social interaction and inclusion.
- 4.24. National policy sets out that open spaces should be protected from development. PfE Policy JP-P7 Sport and Recreation sets out that a network of high quality and accessible sports and recreation facilities will be protected and enhanced, supporting greater levels of activity for all ages.
- 4.25. Open spaces may become under pressure from development. As such, the policy aims to ensure that the borough's existing open spaces are protected from development where appropriate, to ensure that the needs of the community can be met.
- 4.26. Policy CO1 sets out that Council will protect existing open spaces, sport and recreation provision in the borough. It states that the loss of open spaces through development (in whole or part) will only be acceptable in the following circumstances:
 - 1) The development is for alternative open space, sport or recreation provision, where the need for a change in typology can be clearly demonstrated based on local evidence; or
 - 2) Based on local evidence, the Council consider that the open space is surplus to local needs and the land is not required to meet deficiencies in other open space typologies within the appropriate accessible standard distance to the development site; or
 - 3) A small-scale loss of part of the open space is required to enable development on adjacent land which would not prejudice the overall open space function of the site.
- 4.27. It goes on to state that the exception of circumstance 2 above, the loss of open space resulting from proposed development should be replaced by at least equivalent or improved open space (having regard to the open space standards) either onsite in a different part of the proposed development, or offsite in a suitable location which should be determined by the identified deficiencies and accessibility standard. All replacement provision should be provided in line with the requirements

for new or improved open space provision set out in Policy CO2. The exceptions listed above reflect those set out in NPPF paragraph 104.

- 4.28. Since the Draft Plan stage further policy wording has been added in relation to playing fields, pitches and outdoor sports. The policy states that 'all playing fields, playing pitches and outdoor sports provision will be protected in line with this policy, national planning policy and other relevant policy and guidance. The proposed loss (in whole or part) of a playing field, playing pitch or outdoor sports provision will be considered on a site-by-site basis, having regard to Oldham's PPOSS. In line with circumstance 2 above, consideration should also be given to whether the site could be used for an alternative sport in need of provision and/or facilities. Where appropriate, any loss of provision should be replaced by at least equivalent or improved provision in another location, as agreed by the Council, and relevant sporting bodies.'
- 4.29. Therefore, the policy has been developed in line with national policy, PfE and local evidence, addressing the need to protect open spaces from development.

Policy CO2 New and Improved Open Space Sport and Recreation Provision

- 4.30. National policy sets out that planning policies should be based on robust and up-to-date assessments of the need for open space sport and recreation facilities and opportunities for new provision.
- 4.31. PfE Policy JP-P7 Sport and Recreation sets out that: where appropriate, district local plans should set out more comprehensive and detailed recreational standards and standards for provision for designated play areas; new development should provide new and/ or improved existing facilities commensurate with the demand they would generate (the provision of sports facilities will be determined by local authorities through an evidence based approach); and recreation facilities should be located and designed in relation to housing so that they are accessible but also minimise disturbance.
- 4.32. Policy CO2 sets out that the enhancement of existing, and the creation of new, open space, sport and recreation provision in the borough will be supported.
- 4.33. It is important that new development does not place undue pressure on existing open space provision in the borough and ensures that all residents have access to high quality open space close to where they live. This supports sustainable development. As such, the policy sets out thresholds where residential development will be required to provide open space, sport and recreation provision. The policy requires that residential developments of 10 homes and above will be required to provide sufficient public open space, sport or recreation provision onsite. Where it is not possible to provide onsite, a financial contribution towards new or enhanced existing offsite public open space, sport or recreation provision will be sought.
- 4.34. The threshold of 'residential developments of 10 homes and above' has been directly informed by national guidance, which sets out that major developments (defined as 10 homes and above by NPPF Annex 2 Glossary) can seek planning obligations for open space. It is considered that this threshold is appropriate to address local needs and meet identified open space deficiencies.

- 4.35. Since the Draft Plan stage, the policy has been amended to require that Houses in Multiple Occupation (HMOs) with 10 or more occupants, will be required to contribute to offsite new or enhanced open space, sport and recreation provision to meet the needs of the residents. It is considered appropriate to seek developer contributions towards open space provision as part of the development of HMOs which have 10 or more occupants because the additional number of residents could impact on existing open space provision, in a similar way to major residential development.
- 4.36. In order to ensure new or enhanced open space contributes to local needs, the policy clarifies that onsite provision or contributions to offsite new/ replacement provision and enhanced existing provision, should be determined by local open space needs and deficiencies and accessibility to existing provision, as set out in local evidence (including the Open Space Study (2022) and the PPOSS (2025), or subsequent updates.
- 4.37. In terms of sports provision, the policy clarifies that proposals for built sports provision or formal provision will be supported where they are in accordance with other Local Plan policies, national planning policy and other relevant policy and guidance. It states that the PPOSS and Sport England's Playing Pitch Calculator should be used, where appropriate, to inform where and what type of new or enhanced playing pitch and outdoor sports provision is provided, based on identified deficiencies / need.
- 4.38. The policy sets out that where appropriate, contributions to new or improved open space provision will be secured through planning obligations or conditions, as necessary, in line with Policy IN2.
- 4.39. The policy also requires that new open spaces provided onsite should be of a high-quality design, be appropriately located within the development, be accessible, well connected to the existing green infrastructure network and able to provide multi-functional benefits.
- 4.40. The reasoned justification of the policy provides further detail on how the evidence base should be used to identify needs and opportunities for open space, sport and recreation provision.
- 4.41. Furthermore, since the Draft Plan stage, the policy requirements around the Open Space Standards have been added to this policy.
- 4.42. As set out in this topic paper, the Open Space Standards have been developed to ensure that open space provision is fit for purpose, of a high quality and contributes towards meeting local needs.
- 4.43. Within the policy the standards for Quantity, Accessibility, Quality and Value are set out for each type of provision, based on the recommended standards proposed within the Open Space Study. In terms of the development of new or improved outdoor sports provision, the policy clarifies that the site-by-site needs and opportunities identified within the PPOSS should be used to ensure provision contributes to meeting local needs.

- 4.44. The reasoned justification of the policy provides further guidance as to how providers of open space should utilise the standards and determine that proposed open space provision would meet the standards.
- 4.45. The policy has been developed in line with national guidance, PfE and local evidence of open space needs. It provides a clear strategy for seeking the provision of new and enhanced open spaces as part of major housing developments.

Monitoring

- 4.46. Policies CO1 and CO2 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.47. The Local Plan indicators that will be used to monitor these policies are:
- Number of planning applications that result in the gain or loss of identified on-site open space
 - Number of S106 Planning Obligations for new or enhanced open space provision
- 4.48. 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.
- 4.49. As these policies have been informed by PfE Policy JP-P7, the PfE monitoring framework will also help to monitor this chapter.
- 4.50. The following PfE monitoring indicator will help to monitor these policies⁵²:
- Number of hectares of green infrastructure (metric will consider publicly accessible GI where information is available)
- 4.51. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of policies CO1 and CO2.

Integrated Assessment

- 4.52. Policies CO1 and CO2 scored a mixture of significantly positives, positives and neutrals. No negative scores were given and no mitigation or enhancement to the policy was required as a result of the IA.
- 4.53. No changes were made to IA scores between Draft Pan and Publication Plan stage.
- 4.54. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

⁵² As PfE is a Joint Plan of Bury, Bolton, Oldham, Manchester, Rochdale, Salford, Tameside, Trafford and Wigan, the PfE indicators apply plan-wide (including all districts).

Policy CO3: Community Facilities

Summary of Evidence

- 4.55. Community facilities within the borough provide for the health and wellbeing, social, educational, spiritual, recreational and leisure and cultural needs of the community. They include public halls, post offices, non-residential education and training facilities, children's nurseries and childcare centres, health facilities, care homes, village shops and pubs, places of worship and cultural facilities.
- 4.56. There are several issues related to communities within Oldham, including higher rates of infant mortality compared to the Greater Manchester, North-West or National rates; and higher levels of reported 'loneliness' in adults compared to the Greater Manchester, North-West or National levels, which is increasing. As set out in other parts of this topic paper, there are also health and wellbeing related issues and education / skills related issues which are affecting communities.
- 4.57. Community facilities can be lifelines for families, children, young people and older people, enabling them to access health services, care and support. They can also be places for meeting and socialising, fostering integration and social interaction which can improve loneliness and isolation.

Draft Local Plan consultation and Duty to Co-operate

- 4.58. As part of the Draft Local Plan consultation, some responses were received to Policy CO4 - which is now Policy CO3. The comments received / issues raised and the Council's response to these issues are summarised in Table 7 below.

Table 7: Draft Local Plan Consultation Summary and Response – Community Facilities

Comment/ Issue Summary	Council Response
Support the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. The NHS requires flexibility with regards to the use of its estate to deliver excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This doesn't mean that the healthcare services are no longer needed, rather it means that there are alternative	<p>The policy wording has been amended to remove reference to economic viability and to provide greater flexibility, as requested. The policy now states that the loss of sites and premises used for community facilities will only be supported where:</p> <ol style="list-style-type: none"> It is proved the existing use has insufficient demand to support it or is no longer needed; or The loss is part of a wider proposal to improve service provision in the locality; or It is demonstrated that existing facilities nearby can adequately serve identified needs, in an equally accessible manner. <p>Text requested by the NHS has been added to the policy reasoned justification which states that "the approach taken within the policy recognises that there will be instances where facilities and services are no longer needed, in their entirety or in their current</p>

Comment/ Issue Summary	Council Response
provisions that are being invested in to modernise services. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. An amendment to the policy is requested with suggested policy text provided.	form, and that the impact of their loss has been considered as part of a wider strategy.”
Support the aims of this policy to retain, enhance and provide new facilities. This should be based on the latest needs-based assessment which should be formed by a Build Facilities Strategy to accord with NPPF paragraph 102.	Noted. In addition to this policy, Policy CO1 and CO2 also considers sports and recreation facilities.
Suggest amending the final sentence of the policy to say the council will not support housing developments of 50 or more houses unless a commitment is obtained for a commensurate increase in primary healthcare and dentist provision within 30 minutes walking distance of the development.	PfE Policy JP-P6 requires 'where appropriate, the provision of new or improved health facilities as part of new developments proportionate to the additional demand that they would generate'. Local Plan Policy CO6 also sets out requirements for new development and health provision.

4.59. There was also general support provided for the policy.

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

4.61. There are no specific Duty to Cooperate issues associated with this policy. The Council has worked with colleagues in health and education to develop policies within the Local Plan.

Policy Approach

4.62. Recognising the important role that community facilities (examples of which are provided in the policy reasoned justification) provide to the local community, the policy seeks to support new and protect existing provision of cultural, community and health facilities.

4.63. The policy sets out requirements that new community facilities are accessible and appropriate to their surroundings.

4.64. To protect community facilities, the policy sets out that the loss of sites and premises used for community facilities will only be supported where:

- It is proved the existing use has insufficient demand to support it or is no longer needed; or

- The loss is part of a wider proposal to improve service provision in the locality; or
 - It is demonstrated that existing facilities nearby can adequately serve identified needs, in an equally accessible manner.
- 4.65. In addition, the policy requires that the views of the local community, including existing users, and relevant Parish Councils will be important to establish the significance of, and demand for, individual facilities and to develop solutions to enable their retention. This could include communities using rights set out in the Localism Act (2011), including 'Assets of Community Value' and 'Community Right to Bid'.
- 4.66. As set out above, since the Draft Plan stage, the policy has been amended to remove references to economic viability in terms of justifying a loss of a community facility, to reflect comments provided at the Draft Plan consultation by the NHS. It is considered that a more flexible approach was needed to ensure that where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, the Local Plan can support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. Additional wording in the policy reasoned justification clarifies that the approach taken within the policy recognises that there will be instances where facilities and services are no longer needed, in their entirety or in their current form, and that the impact of their loss has been considered as part of a wider strategy.
- 4.67. A further amend has been made to remove policy wording which stated that where the demand resulting from a major residential development will create, or exacerbate, a shortfall in health provision, the Council will seek the provision of new or improved health facilities to address the unmet need generated by the development as appropriate. This is not required as part of this policy as it is covered by Policy CO6 now.

Monitoring

- 4.68. Policy CO3 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.69. There are no specific monitoring indicators for this policy, however given the nature of community facilities other monitoring indicators in the communities' chapter (and within PfE) will help to monitor this policy, including those related to education, life expectancy, proportion of physically active adults, and childhood obesity rates.

Integrated Assessment

- 4.70. The policy scored a mixture of significantly positives, positives and neutrals. No mitigation or enhancements were identified for the policy as a result of the IA.
- 4.71. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy CO4: Education and Skills

Summary of Evidence

- 4.72. There are issues with education attainment being experienced in Oldham, at levels which are worse than the national averages. There are higher levels of 16 to 17-year-olds not in employment, education or training in Oldham compared to that of England as a whole. In Oldham youth unemployment, similar to the general unemployment rate, is also the highest in Greater Manchester.
- 4.73. As such there is a need to ensure access to high-quality education for all residents of Oldham. There is also a need to ensure the availability of lifelong learning opportunities to enhance skills and promote continuous education.
- 4.74. Addressing the skills gap and promoting training programmes which align with the needs of local industries is also important to support employment opportunities in the borough.

Draft Local Plan consultation and Duty to Co-operate

- 4.75. As part of the Draft Local Plan consultation, some responses were received to Policy CO5 - which is now Policy CO4. The comments received/ issues raised and the Council's response to these issues are summarised in Table 8 below.

Table 8: Draft Local Plan Consultation Summary and Response – Education and Skills

Comment/ Issue Summary	Council Response
Encourage the inclusion of the requirement for new educational development to provide for the wider community use of their sports facilities in the interests of achieving our wider outcomes for participation and inclusion and to meet the aims of paragraph 97 of the NPPF.	This is considered in the policy. The policy sets out that “where opportunities arise through new built development and change of use, the shared use of facilities by the local community will be encouraged through planning conditions or planning obligations as appropriate and where such usage can be accommodated without compromising the quality and accessibility for new and/or existing users.”
Welcome the commitment given within Policy CO5, to protect land and buildings in educational uses (where there is a demonstrated need), and to work with the local education authority to identify suitable sites for educational use.	Support noted.

- 4.76. There was also general support for the policy.
- 4.77. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.78. There are no specific Duty to Cooperate issues associated with this policy. The policy has been developed with input from colleagues in Education.

Policy Approach

- 4.79. The overarching approach of Policy CO4 is to foster a community that values and prioritises education and skills development. This policy recognises the fundamental role education plays in personal development, employability, and community well-being. The approach is holistic, aiming to address the diverse needs of Oldham's residents across different age groups and educational levels.
- 4.80. The policy is in line with PfE Policy JP-P5 'Education, Skills and Knowledge' which sets out that significant enhancements in education, skills and knowledge to benefit existing and new residents will be promoted, including by enabling the delivery of new and improved accessible facilities for all ages, such as early years, schools, further and higher education, and adult training to ensure our workforce is ready to benefit from new employment opportunities.
- 4.81. Policy CO4 sets out that development proposals for early years, schools and post-16 facilities shall be supported where they are:
- located within the community it is intended to serve and will be accessible by public transport, walking, wheeling and cycling;
 - located, designed and managed to minimise the impacts of associated traffic and car parking on the surrounding area, including the safe provision of drop-offs and pick-ups to avoid congestion; and
 - providing high-quality indoor and outdoor facilities suitable for the intended number, and age range, of students.
- 4.82. This is to ensure facilities are accessible in terms of location to the communities they serve and are appropriate for the wider area and for the intended usage, in line with NPPF.
- 4.83. The policy also ensures that the shared use of education facilities, such as sports pitches and facilities, by the local community will be encouraged through planning conditions or planning obligations as appropriate, and where such usage can be accommodated without compromising the quality and accessibility for new and/or existing users. Enabling the shared use of facilities within schools can be an important and valuable resource for the local community, where this does not compromise the day-to-day use of the land or buildings. Through for example, allowing the use of playing fields, gym halls and classrooms by the local community during after-school hours. Shared use of facilities is encouraged by NPPF.
- 4.84. The policy protects land and buildings in educational use. It requires that proposals that result in the net loss of educational facilities will be considered in accordance with Policy CO3 Community Facilities.
- 4.85. The policy also sets out that the Council will work with the local education authority to identify suitable sites for educational use where a need has been identified.
- 4.86. Minor amendments have been made to the policy for conciseness/ clarity since Draft Plan stage.

Monitoring

- 4.87. Policy CO4 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

- 4.88. The Local Plan indicators that will be used to monitor this policy are:
- Number of planning applications approved for education related facilities
- 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. As this policy is informed by PfE (JP-P5), the PfE monitoring framework will also help to monitor this chapter.
- 4.91. The following PfE monitoring indicator will help to monitor this policy⁵³:
- Percentage of working age population with Higher Level (4+) qualification(s) and percentage of working age population with sub-Level 2 qualification
- 4.92. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy CO4.

Integrated Assessment

- 4.93. The policy scored a mixture of significantly positives, positives and neutrals. No mitigation or enhancements to the policy were made as a result of the IA.
- 4.94. Since the Draft Plan the policy has been revised in places but not significantly.
- 4.95. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy CO5: Securing Educational Places through New Residential Development

Summary of Evidence

- 4.96. The Council's SCAP considers school capacity, pupil forecasts and capital spend. It is informed, in part, by the Council's Housing Land Supply (set out in the SHLAA) in terms of anticipated future housing growth and development in the borough. New housing development can impact on pupil numbers by increasing populations in areas, via an increase in family housing.
- 4.97. The Local Plan needs to address the challenge of ensuring that the educational infrastructure keeps pace with population growth to prevent overcrowded schools and inadequate educational facilities. There is a need for coordination between residential development planning and the provision of educational facilities. This will ensure that new communities have access to schools, colleges, and other educational resources from the outset.

⁵³ As PfE is a Joint Plan of Bury, Bolton, Oldham, Manchester, Rochdale, Salford, Tameside, Trafford and Wigan, the PfE indicators apply plan-wide (including all districts).

Draft Local Plan consultation and Duty to Co-operate

- 4.98. As part of the Draft Local Plan consultation, some responses were received to Policy CO6 - which is now Policy CO5. The comments received / issues raised and the Council's response to these issues are summarised in Table 9 below.

Table 9: Draft Local Plan Consultation Summary and Response – Securing Educational Places through New Residential Development

Comment/ Issue Summary	Council Response
As a viability assessment was not provided at Draft Plan Stage, the appropriateness / soundness of the policy cannot be determined.	A Viability Assessment has now been carried out and informs the Publication Plan. The assessment has considered developer contributions for education places. In any case viability can be considered on a case-by-case basis in certain circumstances as set out in NPPF/ PPG, and in line with Local Plan Policy IN2 'Planning Obligations'.
There is an error in the supporting text for Policy CO6, at paragraph 19.38. The relevant legislation is the Education Act 1996.	This has been amended in the publication plan policy.
It would be helpful if policy provided greater clarity over how developer contributions will be sought to meet the need for early years, post-16 and SEND Places, recognising that the local authority has a duty to secure sufficient education and training provision for young people with an Education, Health and Care (EHC) plan up to the age of 25.	The policy reasoned justification sets out that in relation to developer contributions for early years, post-16 and SEND places, the DfE's Developer Contributions Guidance provides further guidance on this matter. In addition, the reasoned justification encourages early engagement with the local education authority, as part of pre-application discussions, to ensure that the education demands generated by the development proposed are appropriately met - this can include considering early years, post-16 and SEND places.
Paragraph 19.43 should also be updated in the next version of the local plan. The paragraph refers to DfE's plans to produce a detailed methodology for calculating pupil yield from housing development, to be published in due course. This work was completed in August 2023. The pupil yield factors in the dashboard are consistent with those from local evidence in Oldham, at 0.46 for primary education, and 0.29 for secondary. In paragraph 19.45, it would be helpful to highlight the fact that the cost of school places within new schools will be higher again than the figures quoted. The cost will be £23,192 for a primary place and £28,096 for a secondary place, based on 2023 prices.	The policy reasoned justification has been amended to reflect the latest available yield figures (June 2025). However, the reasoned justification adds that "costs per school place will be identified using the DfE's most recently published local authority school places scorecards", to ensure that the costs reflect updated evidence. In addition, the reasoned justification encourages early engagement with the local education authority, as part of pre-application discussions, to ensure that the education demands generated by the development proposed are appropriately met. As such, it is considered that the policy allows appropriate flexibility to consider future cost changes and alternative costs, in line with evidence.

- 4.99. There was also general support provided to the policy.
- 4.100. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.101. There are no specific Duty to Cooperate issues associated with this policy. The policy has been developed with input from colleagues in Education.

Policy Approach

- 4.102. The Council has a statutory duty under the Education and Inspections Act 1996 to ensure that there are sufficient school places available within the borough to meet the educational needs of the population.
- 4.103. National planning policy requires local planning authorities to take a proactive, positive, and collaborative approach to ensure that there is a sufficient choice of school places available to meet the needs of existing and new communities.
- 4.104. PfE Policy JP-P5 sets out that significant enhancements in education, skills and knowledge to benefit existing and new residents will be promoted, including by ensuring the delivery of sufficient school places to respond to the demands from new housing, such as through:
- a. working with education providers to forecast likely changes in the demand for school places; and
 - b. Where appropriate, requiring housing developments to make a financial contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate.
- 4.105. In line with the duty (in the Education and Inspections Act 1996), national planning policy and PfE, the policy seeks to ensure that new residential development (of 10 dwellings and above) which would create or exacerbate a shortfall in the number of local school places, contributes to new and/or improved education facilities. This is to address the unmet need that may be generated by the development, i.e. from an increase in population/ families.
- 4.106. The policy goes on to set out that such provision will typically involve making a financial contribution towards the expansion of an existing education facility in agreement with the local education authority. Where it is not practicable or desirable to meet the unmet demand through expanding capacity on-site provision may be required and the Council will negotiate with developers to secure the setting aside of land to accommodate the additional education provision.
- 4.107. To calculate the contribution, for each relevant type of education provision, the following formula will be used: Pupil yield factor x Cost per pupil place = Financial contribution.
- 4.108. As clarified in the reasoned justification, financial contributions will be calculated based upon expected pupil yields resulting from the proposed development and identified costs per school place to accommodate expansion of provision. Expected pupil yield will be identified in accordance with the DfE guidance on estimating pupil yield from housing development and be informed by local evidence. Costs per school place will be identified using the DfE's most recently published local authority

school places scorecards⁵⁴. Based on the June 2025 costings, one dwelling, proposed as part of a new residential development, will yield 0.46 of a primary school place and 0.29 of a secondary school place. It is intended that the costs will be updated as appropriate i.e. when new schoolcards are published, to ensure the policy remains up-to-date.

- 4.109. The policy provides a pro-active approach to ensuring that the Local Plan addresses the challenge of ensuring that the educational infrastructure keeps pace with population growth to prevent overcrowded schools and inadequate educational facilities. It also encourages coordination between residential development planning and the provision of educational facilities. This will ensure that new communities have access to schools, colleges, and other educational resources which is appropriate and required.
- 4.110. The policy has had minimal changes since the Draft Plan stage. Draft Plan policy wording which required that residential development is phased to ensure that the additional education provision is secured and in place before demand exceeds existing capacity, has been removed. It is considered that this wording is not necessary, as only large developments tend to be phased, and any phasing requirements related to education provision can be dealt with appropriately as part of section 106 and planning conditions, where necessary, in line with Local Plan Policy IN2.

Monitoring

- 4.111. Policy CO5 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.112. The Local Plan indicators that will be used to monitor this policy are:
- State funded primary and secondary school capacity and forecasts
 - Number of planning applications approved for education related facilities
- 4.113. 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.
- 4.114. As this policy is informed by PfE (JP-P5), the PfE monitoring framework will also help to monitor this chapter.
- 4.115. The following PfE monitoring indicators will help to monitor this policy⁵⁵:
- Numbers of school places

⁵⁴ The DfE's most recently published local authority school places scorecards are available at <https://explore-education-statistics.service.gov.uk/find-statistics/local-authority-school-places-scorecards/2024>

⁵⁵ As PfE is a Joint Plan of Bury, Bolton, Oldham, Manchester, Rochdale, Salford, Tameside, Trafford and Wigan, the PfE indicators apply plan-wide (including all districts).

- Consideration of ‘headroom’ statistics where available (education/ school places)

4.116. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy CO5.

Integrated Assessment

4.117. The policy scored a mixture of significantly positives, positives and neutrals, with a high positive result in relation objective 22. No mitigation or enhancements to the policy were required as a result of the IA.

4.118. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy CO6: New Development and Health

Summary of Evidence

4.119. Chapter 8 ‘Healthy and Safe Communities’ of the National Planning Policy Framework (2024) states that planning policies and decisions should aim to achieve healthy, inclusive and safe places.

4.120. PPG on Healthy and Safe Communities (2019) sets out that planning and health should be considered to create environments that support and encourage healthy lifestyles and to identify and secure the facilities needed for education and the wider health and social care system. The PPG states that a HIA is a useful tool to use where there is expected to be significant impacts of development on health.

4.121. PfE Policy JP-P6 sets out that new development should:

- maximise it’s positive contribution to health and wellbeing, avoiding any potential negative impacts;
- support healthy lifestyles, including through the use of active design principles;
- be supported by a HIA for all developments which require to be screened for an Environmental Impact Assessment, and other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing.

4.122. There are several issues related to health and wellbeing being experienced by Oldham’s residents. The life expectancy and healthy life expectancy of Oldham’s residents is below the national average, and there are inequalities for life expectancy for people living in different parts of the borough. There are also issues with childhood mortality, obesity, physical inactivity, mental health and loneliness. Oldham is also the 11th most deprived Local Authority in England, with 37% of Oldham’s LSOAs⁵⁶ within the top 10% most deprived in England.

⁵⁶ Lower Super Output Areas (LSOAs) are made up of groups of Output Areas (OAs), usually four or five. They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons.

- 4.123. There is a need to support the ambitions of Oldham's Health and Wellbeing Strategy to enable people to lead longer, healthier and happier lives, and reduce the gap in health outcomes between different groups and communities in Oldham. There is also a need to support Oldham's commitments to being a resident focused borough – providing care and support close to people's homes. In addition, to ensure sustainable development it is important that new residential development is supported by health provision.
- 4.124. There is a need for the Local Plan to support improvements in health and wellbeing. In addition to the planning policy areas discussed in this topic paper other policies such as air quality, nature, employment, housing, transport and design can also support improvements in health and wellbeing.

Draft Local Plan consultation and Duty to Co-operate

- 4.125. As part of the Draft Local Plan consultation, several responses were received to Policy CO7 - which is now incorporated into Policy CO6. At Draft Plan stage, Policy CO7 mainly focused on the requirements for HIAs.
- 4.126. The comments received / issues raised and the Council's response to these issues are summarised in Table 10 below. There were also comments which supported the policy in general.

Table 10: Draft Local Plan Consultation Summary and Response – Health Impact Assessments in New Developments

Comment/ Issue Summary	Council Response
<p>PPG4 sets out that HIAs are 'a useful tool to use where there are expected to be significant impacts', but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Only where there is a departure from the plan should the council consider requiring a HIA.</p> <p>Any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA for development proposals of 100 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.</p>	<p>The policy has been amended to reflect PpE Policy JP-P6 where a Health Impact Assessment will be required for all developments screened for an Environmental Impact Assessment, and other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing. This is in line with national planning guidance.</p>
<p>A lot of developments in Saddleworth will be smaller than the threshold of 100 dwellings</p>	<p>The policy has been amended to reflect PpE Policy JP-P6 where a</p>

Comment/ Issue Summary	Council Response
(where a HIA is required), therefore for Saddleworth this should be reduced to 50 dwellings.	Health Impact Assessment will be required for all developments screened for an Environmental Impact Assessment, and other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing. As such, the policy is not related to site capacity anymore.

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

4.128. There are no specific Duty to Cooperate issues associated with this policy. The Council has worked with colleagues in Public Health to develop policies within the Local Plan.

Policy Approach

4.129. At Draft Plan stage, the policy mainly focused on the requirements for HIAs. It has since been broadened, as set out below, to include policy for the development of new health facilities, the loss of health facilities, HIA requirements and requirements for new residential to contribute to health facilities, as appropriate. The policy has been renumbered and renamed from CO7 'Health Impact Assessments in New Development' to CO6 'New Development and Health'.

4.130. Policy CO6 prioritises public health by requiring a Health Impact Assessment in line with PfE Policy JP-P6. The policy sets out that the following (criteria a-i) should be considered by the HIA (where relevant):

- a) Housing standards and affordability;
- b) Access to healthcare services and other social infrastructure
- c) Access to open space and the natural environment;
- d) Air quality, noise and amenity;
- e) Accessibility and active travel;
- f) Crime reduction and community safety;
- g) Adaptation to climate change;
- h) Access to work and training; and
- i) Access to healthy food choices.

4.131. Requiring an HIA for such developments ensures a thorough examination of health implications, supporting the creation of developments that enhance the well-being of residents. By mandating a HIA for developments requiring an Environmental Impact Assessment, the policy ensures a comprehensive examination of potential health disparities and impacts on marginalised communities. This aligns with principles of social equity and inclusivity.

- 4.132. The policy sets out that where a development is found to have significant negative impacts on health and wellbeing applicants may be required to provide mitigation of such impacts through the use of planning conditions and / or financial contributions.
- 4.133. The policy takes a strong stance by stating that proposals deemed to have an unacceptable impact on health or wellbeing will not be permitted. This approach demonstrates a commitment to preventing developments that could have adverse effects on public health, aligning with principles of sustainable development.
- 4.134. Considering the additional demand new residential development may have on health provision, the policy requires that where demand resulting from a residential development (of 10 dwellings and above) will create or exacerbate a shortfall in health provision, the Council will seek the provision of new or improved health facilities to address the unmet need generated by the development, as appropriate.
- 4.135. In addition, to align with local need, the policy sets out that developers should engage with the GM Integrated Care Partnership – Oldham Locality and Integrated Care Board at the earliest opportunity to determine the health care requirements associated with new development.
- 4.136. The policy also supports the development of new health facilities where they are located in areas of identified need, as evidenced by the GM Integrated Care Partnership – Oldham Locality and relevant NHS strategies; and where they are co-located with other community services where appropriate to support integrated care delivery. Requiring developers to align their proposals with wider health and well-being strategies ensures that developments are part of a larger, coordinated effort to promote community health. This approach integrates individual projects into a broader health framework.
- 4.137. The policy also sets out loss of a healthcare facility will only be supported where it has been formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan. This is to ensure that health provision is protected where it is required and can be used to meet local needs.

Monitoring

- 4.138. Policy CO6 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.139. The Local Plan indicators that will be used to monitor this policy are:
- Life Expectancy
 - Proportion of physically active adults
 - Childhood obesity rates
- 4.140. 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.

4.141. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy CO6.

Integrated Assessment

4.142. The policy scored a mixture of neutral, positives and significantly positive scores. Some effects were cross boundary, but the majority were local. No mitigation or enhancements to the policy was required as a result of the IA.

4.143. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

4.144. A Health Impact Assessment (HIA) has been prepared to support the Local Plan⁵⁷. The HIA assesses the potential health and wellbeing impacts of the Oldham Local Plan: Publication Plan, and forms part of the Integrated Assessment.

4.145. The assessment concluded that alongside the strategic framework set by PfE, the potential health impacts of the Oldham Local Plan: Publication Plan are considered positive.

Policy CO7: Hot Food Takeaways and Fast-Food Outlets

Summary of Evidence

4.146. National Planning Policy states that local planning authorities should refuse applications for hot food takeaways and fast-food outlets under certain criteria linked to distance to schools and / or where there is evidence that such uses have adverse impacts on local health, pollution or anti-social behaviour.

4.147. Planning Practice Guidance on Healthy and Safe Communities refers to planning for an environment that supports people of all ages in making healthy choices and promotes access to healthier food. It has a specific section on using planning to create a healthier food environment. It states that planning policies can, where justified, seek to limit the proliferation of particular uses, such as takeaways and hot-food takeaways where evidence demonstrates this is appropriate (and where such uses require planning permission).

4.148. Place has a significant impact on health and wellbeing. The ability of individuals to lead healthy lifestyles is deeply influenced by the environment in which they live. Good physical and mental health is related to good quality housing and developments, well designed street scenes, well laid out neighbourhoods, quality and efficiency in transport systems, opportunities to experience community, leisure and cultural services activities and access to green and open space.

4.149. As set out in this topic paper, Oldham has several issues related to health and wellbeing, including issues with higher levels of obesity, including childhood obesity,

⁵⁷ See Appendix 18 of the Integrated Assessment – Oldham Health Impact Assessment of the Publication Plan.

and higher levels of physical inactivity than the national averages and lower life expectancy and healthy life expectancy than the national averages.

- 4.150. In addition, the density of fast-food outlets in Oldham is also above that in England, with there being 124.4 per 100,000 population as opposed to 96.5 across England (2017). High levels of deprivation in Oldham coincide with a high prevalence of unhealthy weight and high numbers of fast-food outlets, as all tend to be within the inner Oldham wards. The latest JSNA shows that 35% of areas in Oldham are amongst the 10% most deprived areas in England (this is 7 out of 20 wards). This mirrors the position nationally, where increased access to fast food outlets in the most deprived areas has been shown to adversely impact unhealthy weight and health inequalities.

Draft Local Plan consultation and Duty to Co-operate

- 4.151. Draft Local Plan Policy CO8 'Hot Food Takeaways' has been incorporated into Policy CO7.
- 4.152. As part of the Draft Local Plan consultation, only one response was received to Policy CO8 'Hot Food Takeaways'. The response supported the policy in general.
- 4.153. Previously, at the Issues and Options consultation, views were sought on a policy which restricts the location of Hot Food Takeaways (HFT's). There were several responses to this, including some strong support from communities for restricting the location of HFT's, however there was a strong response from industry against the proposal in relation to the suggestion of restricting them to areas 400m away from a primary school.
- 4.154. These were considered as reasonable alternatives with three options considered - including restricting the location of hot food takeaways within 400m of a school (option A)/ in areas with high levels of obesity (option B) / and within 400m of a school and in areas with high levels of obesity (option C). These options were consulted upon and tested through the Sustainability Appraisal. The outcomes of the appraisal of these options and how they informed the Publication Plan are set out within the Integrated Assessment.
- 4.155. There is no specific Duty to Cooperate issues associated with this policy.

Policy Approach

- 4.156. In line with evidence set out above, Policy CO7 aims to foster healthier food environments.
- 4.157. Policy CO7 aims to strike a balance in Oldham Town Centre, allowing for the provision of hot food takeaways and fast-food outlets but limiting their concentration to preserve the diversity and character of commercial areas. Outside of Oldham Town Centre, the policy states that planning permission for hot food takeaways and fast-food outlets will not be granted where:
- 1) They are within 400m of a primary or secondary school; or
 - 2) They are within 400m of places where children and young people congregate.
- 4.158. The policy (criteria a - g) goes onto require that proposals for all hot food takeaways and fast-food outlets demonstrate that:

- a) There would be no unacceptable impact on residential amenity;
- b) There would be no adverse implications for traffic management, parking or highway safety;
- c) The hours of operation are appropriate for its location and having regard to neighbouring uses;
- d) Appropriately designed and sited fume extraction systems and/or noise insulation are provided;
- e) An appropriate location for commercial trade waste including recycling facilities has been identified;
- f) Litter will be contained within the curtilage of the premises, stored to avoid odour nuisance, be convenient for refuse collection and screened to protect visual amenity. Any litter bin provision should be retained in perpetuity; and
- g) Healthier food and drink options will be promoted and made available as a standard part of the menu.

4.159. The policy also requires that applications for hot food takeaways and fast-food outlets must be supported by a proportionate HIA, in line with Policy CO6.

4.160. This comprehensive approach ensures that hot food takeaways and fast-food outlets are integrated thoughtfully into their surroundings.

4.161. The policy has been amended since the Draft Plan Stage. Reference to the other centres (not including Oldham Town Centre) and shopping parades has been removed, as has the 10% concentration measure. This is for clarity and simplicity.

4.162. In addition, the Draft Plan policy set out that proposals for hot food takeaways within 400m of the principal entry point to a secondary school or sixth form college will only be granted permission if it would not result in a proliferation of said uses, and conditions would be applied to mitigate any negative effects during school hours. The amended policy now includes primary schools (as well as secondary schools) and other places where children and young people congregate. It also takes a stronger stance stating that hot food takeaways and fast-food outlets within 400m of these areas will be refused and removes reference to conditions. This change has been made to reflect the stronger wording in the amended NPPF (2024).

Monitoring

4.163. Policy CO7 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

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

- The number of new hot food takeaways approved within 400 meters of a primary or secondary school, or places where children and young people congregate

4.165. 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.

4.166. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy CO7.

Integrated Assessment

- 4.167. The policy scored a mixture of one significantly positive score against health, positives, and neutrals. No mitigation or enhancements to the policy were made as a result of the IA.
- 4.168. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

5. Conclusion

Providing an appropriate strategy

- 5.1 Policies CO1 to CO7 of the Oldham Local Plan: Publication Plan provide the policy framework for ensuring that we can deliver well-supported communities, ensuring residents are safe, healthier and have opportunities for education and skill development at all stages of life.
- 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, as well as providing policies to support communities across the plan area. The Local Plan sets out policies (CO1 and CO2) for how we will protect and deliver new and/ or improved open space sport and recreation provision, in line with local evidence of needs and opportunities, which is high-quality and accessible to where people live. The Local Plan also sets out policy (CO3) to protect community facilities and support the provision of new and improved facilities which are accessible and appropriate. Policies (CO4 and CO5) are provided to support improvements in education and skills, protect provision and ensure that new provision is accessible, well-designed and provide high quality facilities; and to secure educational places through new major residential development to ensure there is adequate capacity in education facilities to meet demand generated. The Local Plan also includes policies to deliver and support health improvements and healthy lives. Policy CO6 supports new health facilities and protects existing provision where necessary; it sets out that, where appropriate, proposals for new development provide HIAs (and states what they should consider); and requires that new major residential development contributes to new or improved health facilities where necessary to address unmet need generated by the development. Policy CO7 addresses hot food takeaways and fast-food outlets ensuring they are appropriately located, do not impact the local environment or result in an unacceptable concentration of uses within a particular area.
 - b) **Justified:** policies CO1 to CO7 provide an appropriate strategy in relation to communities across Oldham. There are other policies in the plan which will support communities including those related to housing, green infrastructure, design, local environment and employment.

The policies have been informed by stakeholder feedback (including that provided to the Draft Local Plan consultation), national planning policy and guidance, PfE policies and local evidence and issues.

The policies are justified as they represent the most appropriate strategy when considered against the reasonable alternatives and are supported by a robust evidence base. Reasonable alternatives were considered in relation to hot food takeaway policy, with three options considered –including restricting the location of hot food takeaways within 400m of a school (option A)/ in areas with high

levels of obesity (option B) / and within 400m of a school and in areas with high levels of obesity (option C). These options were consulted upon and tested through the Sustainability Appraisal. The outcomes of the appraisal of these options and how they informed the Publication Plan are set out within the Integrated Assessment.

The policies help to deliver the Local Plan's vision for Oldham's residents to be healthy, safe and well-supported, having a great start from early years and with skills for life; for residents to have access to local community facilities and health and well-being provision; for residents to have active and healthier lifestyles; and to have opportunities for training and life-long education available to all. The policies also seek to deliver the Plan objectives providing opportunities to learn and gain new skills (plan objective 2) via improvements in education opportunities and new school places; and to uplift the health and well-being of the borough's residents and local communities (plan objective 8) by ensuring access to new and improved open space, sport and recreation provision, protecting community facilities, supporting healthy environments and supporting new and improved health facilities.

The policies will help achieve the Oldham Plan and Corporate Plan missions for Oldham to be a great place to live with vibrant communities and ensuring everyone has happier and healthier lives, with access to care, support and opportunities they need.

- c) **Effective:** the Oldham Local Plan: Publication Plan supports delivery of PfE which sets out policies to support communities across the plan area. 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 CO1 to CO7 support the delivery of sustainable development in accordance with relevant national policy, in particular:
 - i. Ensuring development is supported by appropriate open space, sport and recreation provision, education provision and health facilities, in line with the aims of achieving sustainable development and well-integrated developments.
 - ii. By setting out policies for the protection, enhancement and new open space, sport and recreation provision, in line with local evidence of needs and opportunities. It also provides policy on how open space, sport and recreation should be provided, and the expected standard of these spaces. The policies recognise the important role access to quality open space plays in health and wellbeing and fostering social interaction and inclusion.
 - iii. By supporting healthy lifestyles, through promoting good health and preventing ill-health, by addressing local needs and reducing health inequalities through supporting the provision of new and improved health

facilities, community facilities and open spaces, and encouraging healthier foods by controlling the locations of hot food takeaways and fast-food outlets.

- iv. By planning positively to ensure the protection of community facilities against loss and to support the delivery of new social, recreational and cultural facilities.
- v. By taking a proactive approach to ensuring new development delivers school places, as appropriate, to ensure demand that may be increased through the development can be met, and by supporting the delivery of new and improved education facilities which, where appropriate, are made available to the wider community to benefit from.