

Oldham

Local Plan

**Oldham Local Plan: Publication Plan -
Regulation 19(1) Representations - Part 07 -
Ti to Wa**

August 2026



Oldham
Council

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From: Sebastian Tibenham [REDACTED]
Sent: 27 March 2026 21:02
To: SPI Consultations
Cc: Myles Davies; Rebecca Dennis
Subject: Oldham Local Plan Representations on behalf of DWFCO
Attachments: L012v1 - Oldham Local Plan Reg 19 Reps.pdf

Dear Sir/Madam

Please see attached our representations to the Oldham Local Plan on behalf of DWFCO with links to the relevant appendices below:

 [L012v1 - App1 - Open Space Study 2022 Summary.pdf](#)
 [L012v1 - App2 - Open Space Study 2022 Main Doc.pdf](#)  [L012v1 - App3 - Land Parcel Plans to be omitted as POS.pdf](#)
 [L012v1 - App4 - Landscape and Ecological Masterplan.pdf](#)
 [L012v1 - App5 - LVA 2019.pdf](#)  [L012v1 - App6 - 2019 Draft GMSF Woodhouses Allocation Policy.pdf](#)

I would be grateful if you could confirm receipt, including access to the Appended documents.

Regards

Sebastian Tibenham
Executive Director – Planning

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27 March 2026

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Dear Sir / Madam

Oldham Regulation 19 Local Plan – Representations
On behalf of DWFCO/Landowner
Land west of Failsworth Road, Woodhouses

Introduction

Pegasus Group are instructed to make these representations to the Regulation 19 Draft Local Plan on behalf of a local landowner.

There are three key points we wish to cover in relation to:

- 1) The Proposed Plan Period, which falls significantly short of the required 15 year plan period from adoption.
- 2) The Council's Claimed 5 Year Housing Land Supply Position, which we do not consider is not robust or sufficiently justified; and
- 3) Open Space designations identified on the Proposal's Map's located on the edge of the village of Woodhouses, which we do not consider are justified or reflective of the actual use of the land.

Based on the above, we consider the Regulation 19 Local Plan is unsound and should be abandoned / withdrawn and the process restarted accounting for a full 15 year plan period and the allocation of sufficient housing sites to meet the required needs over this period.

Plan Period

The Local Plan covers a period of 2022 to 2039. The NPPF (paragraph 22) states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger

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scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

The Council's Local Development Scheme (LDS, March 2025) envisages adoption of the Local Plan by Spring 2027. If that is the case, then the plan will only have a plan period of 11 years, which is significantly shorter than the minimum 15 years set out in national policy. This proposed approach inadequate and hampers longer term strategic change for the area and is not consistent with the NPPF.

Whilst it is noted that the PfE DPD provides a plan period up to 2039, it specifically mentions that the constituent authorities will need to extend their plan period beyond this (see PfE paragraph 1.56).

As a minimum, the plan period should therefore be extended to at least 2042 to ensure compliance with national policy and consistency with the requirements of the PfE.

Lack of any Housing Allocations for the Area (other than strategic sites identified in the PfE)

The Oldham Local Plan does not propose any housing allocations, with paragraph 2.6 stating that

"The Oldham Local Plan has been aligned with the plan period of PfE – up to 2039, given that it is supporting delivery of the Joint Plan. In addition, as this Local Plan focuses on non-strategic planning policies that deal with primarily development management matters, it does not include allocations for future development, whether that be for new homes or employment."

As the Local Plan is providing a more detailed spatial element for the development plan for Oldham, it is considered that allocating deliverable and developable sites (in line with paragraph 72 of the NPPF) will assist in clearly demonstrating land supply over the plan period and provide certainty for developers wanting to deliver new homes.

Furthermore, the Council will also need to demonstrate that there is land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Without actively allocating such sites, this becomes more difficult to demonstrate and may then disincentivise small and medium sized builders.

Indeed, rather than allocations, the Reasoned Justification which accompanies the policy outlines that the Strategic Housing Land Availability Assessment (SHLAA) and Brownfield Register provide details of sites considered suitable, available and achievable for residential development, and should be used as a starting point to identify potential development sites.

We query why such sites cannot be allocated so as to give them development plan status, to demonstrate that the Council is proactively attempting to boost housing supply in the Borough and to provide confidence for the development industry. This is especially important given the total capacity of PfE DPD allocations is 2,766 dwellings and the remaining UDP allocations are 253 dwellings (see Appendix 1a of the SHLAA). This represents a fraction of the total requirement over

the plan period. There is therefore a clear need to allocate sites in the plan to ensure that it is positively prepared, effective and that development is appropriately plan-led in nature.

Lack of a 5 Year Housing Land Supply

The obligation placed on the Council is to demonstrate it does have a deliverable 5 year housing land supply as set out paragraph 78 of the NPPF. We do not consider the Council have addressed this obligation and do not have a deliverable 5 year supply of housing backed up with sufficient evidence.

The 2024 SHLAA suggested the Council's 5 year housing supply stood at 3,495 dwellings whilst the 2025 SHLAA presents a significantly increased supply of 4,544 dwellings representing a 30% uplift. What is evident from the headline supply categories, is that from 1st April 2025, the Council now expect to see a much greater proportion of their housing supply over the next 5 years come from 'potential/pending sites', with a **100% increase to 1,439** dwellings when compared to the position set out on 1st April 2024.

In the context of demonstrating a deliverable 5 year housing land supply position, we consider the following number of dwellings should be removed from the Council's claimed 5 year supply on the basis that they do not currently meet the definition of 'deliverable':

- 80 dwellings should be removed from the sites under construction category,
- 0 dwellings should be removed from the extant planning permission category,
- 4 dwellings should be removed from the UDP allocations category,
- 10 dwellings should be removed from the lapsed / stalled sites category,
- 1,439 dwellings should be removed from the potential/pending category, and
- 546 dwellings should be removed from the PfE Allocations category.

We note that this position may evolve prior to the Examination in Public being undertaken and therefore reserve our right to provide additional evidence on the above position through any future hearing statements we may prepare.

Policy C01 – The Protection of Open Space, Sport and Recreation

We do not have a particular issue with the wording of this policy, which seeks to protect open space and also allows for some flexibility for scheme to result in the loss of open space where an quantitative or qualitative improvement can be made. Overall, we consider it is acceptable and provides sufficient flexibility. However, it's restrictive nature must therefore mean that the areas to which this policy applies must be fully justified by a clear understanding of how the area functions and is used.

Footnote 158 of the Policy confirms such open spaces comprise of strategic open spaces identified on the policies map and all other open spaces as identified in the Open Space Study (2002), or any subsequent update.

We firstly question the reference to subsequent updates. The policy should be founded on tangible and accessible evidence base to demonstrate why the designations should apply now. Any future evidence collated on this matter should also go through a consultation and examination process if it is to inform the Policies Map or planning decisions in the future.

Secondly, we note that the 2022 Open Space Study has not been issued as a key evidence base document as part of this consultation process, despite it being fundamental to the designation of open space land on the supporting Policies Map. This should be rectified, and the full assessment should be made publicly available (as part of the Local Plan consultation process) before the Local Plan is submitted to the SoS for examination and a further discrete round of consultation undertaken once the full content of this document has been made available, including any site specific site proforma that were prepared to inform the assessment

In the meantime, we have been able to separately source the 2022 Summary Document and Main Assessment that were prepared by Tyler Grange and have attached these as part of our representation at **Appendix 1 and 2** accordingly.

However, we are aware that site proforma assessment were carried out in a number of cases and we would kindly request that these are made available as it is not transparent at this stage as to why certain sites have been included as an open space designation, particularly given the 2022 assessments does not include site reference numbers and associated mapping for each area of open space. Indeed, it is difficult to match the named site areas provided in Appendix C of the 2022 Assessment with precise site areas.

Open Spaces Designations

In the meantime, we have a particular concern with two Open Space designations that are identified on the supporting Proposals Map, relating to:

- Woodhouses Trotting Track (oval turquoise green area north of Woodhouses village); and
- Areas of land between Woodhouses and Failsworth (parts of the large olive green area).

The image provided below at **Figure 1** is an extract from page 3 of the Summary Open Space Assessment (see **Appendix 2**) rather than the Policies Map but the boundaries of the same.

The turquoise green colour applied to the Trotting Track is referred to as outdoor sports facilities in the respective key, whilst the olive green colour is referred to as Natural and Semi Natural Green Spaces.

Figure 1 – Plan Extract from 2022 Open Space Assessment Summary



Woodhouses Trotting Track

The Woodhouses Trotting Track is an oval area identified on the proposed Policies Map to the immediate north of Woodhouses village. It sits north of an existing pub car park and existing residential homes. It is illustrated on the plan at **Appendix 3** as Parcel A.

It is identified by name in Appendix C of the 2022 POS Assessment as an outdoor sports facility, with a quality score of 80, quality banding of very good, a total value score of 16% and a value banding of Low. Without the specific site proforma it is impossible to determine how these scores and banding have been justified, particularly given the main body of the report makes no further reference to this suggested Open Space asset.

This area should not be designated as public open space on the proposal map for the following reasons:

- The site was not identified as public open space on the Proposals Map supporting the adopted Oldham Local Plan/Core Strategy or Oldham UDP.
- There is no clear justification for including the parcel as Public Open Space now because no site proforma or evidence highlighting how Tyler Grange came to the above rankings has been provided.
- It does not meet the definition of a Playing Pitch.

- It does not meet the definition of a Local Green Space and is not identified as such.
- The track is privately owned and leased as a privately used equestrian area along with some of the neighbouring fields.
- The land is not, and has never been, publicly accessible (at last for the last 30 years and perhaps longer);
- There are no public rights of way that cross the pony track.
- It is not part of a riding school or other facility where members of the public can pay to use the track for outdoor sport or recreation. Instead, it is only for the sole use of the tenant who occupies the site with their own horses.
- No other land in privately owned equestrian facilities/menages or even riding schools that are accessible to the public within Oldham appear to have been identified as Open Space on the Proposals Map, further raising doubt over why this private land has been.

The Woodhouses Pony Track should therefore be removed from the Proposals Map as designated Public Open Space on the basis that the designation is not justified and does not even meet the broad criteria set out in the PPG (paragraph 37-001-20140306)

As noted above, Tyler Grange have identified the land / track as an outdoor sporting facility but as noted above, that is not its function in terms of being available to the public to use in any form. Should the Council consider that it does meet an outdoor sporting definition because of its equestrian use, it will therefore be necessary for the Council to take an equal and equitable approach to all privately owned land that is utilised for equestrian use and also identify such facilities on the Policies Map. We are confident that it is not the Councils intention to do so because such an approach would be unjustified.

Open Space Land located between Woodhouses and Failsworth

On the Policies Map there is a large area of open space that is identified that sits between Woodhouses and Failsworth (see image above).

It is not entirely clear if this area of land that is identified on the Policies Map has been assessed by Tyler Grange in the 2022 Open Space Assessment (again due to the fact that the Open Space Site names are not supported by a corresponding plan or site reference number within the respective assessments).

However, we did approach Tyler Grange directly on this matter to see if they could provide any clarity. Their response was that the land in question was named Cutler Bridge in the report. We don't believe this is correct because Cutler Bridge is referenced as being within the Saddleworth Area and not Failsworth East (which is the ward in which the land in question lies). Regardless, Tyler Grange did confirm that the parameters for their Quality Audit Assessment are set in Figure 4 of



the Main Document, which confirms that areas that were either below 0.2 ha or above 10 ha where not audited by them but instead formed part of the quantity and accessibility analysis.

This would indicate that site visits were not undertaken to review the boundaries of this area, which as noted above date back to when the UDP was prepared.

We do accept that parts of this wider area could potentially constitute and merit an Open Space designation despite the land being privately owned on the basis public access is available in part due to PROW network across parts of the designation. Indeed, this is the case in the context of some of our client's land control closest to Lord's Brook. However, there are other parts of their land ownership that are distinctly separated from the PROW by fences and boundary treatments where access is restricted and the land is more removed from the watercourse, which we do not consider meet the purpose of designated the land as Open Space.

Indeed, we consider there has to be some level of public benefit/accessibility or a distinct natural habitat quality for the land to be designated as Open Space but this should be limited to areas that are accessible or have some level of ecological designation.

Regarding the latter point, the adopted Policies Map does show a small SBI area in the locality called Lord's Flashes but this area is no longer identified by GMEU as an SBI and we note that it has been removed from the proposed Policies Map. This further bring into question why the area of Open Space to the north of Woodhouses has not been reviewed as part of the Open Space Assessment.

There are two distinct areas of land within our client's control and within the wider Natural and Semi Natural Open Space area designation that we dispute, They are also shown on the plan at **Appendix 3** and include:

- **Parcel B** – This parcel comprises of two privately owned and adjoining paddock areas that are independently fenced off to prevent public trespass and access. One is located adjacent to a residential property that fronts onto Failsworth Road, which is managed by the residential owner for their own private use. The paddock to the rear of this forms part of the leased area to the tenant of the nearby trotting track and used by them to stable some the feed/hay for their horses and is a turn out area for the horses (along with the neighbouring field to the west, which isn't defined within the open space area).
- **Parcel C** – An agricultural field that is located to the east of Failsworth Road and adjacent to the M60. This is a single field in private ownership and farmed. There is also a valid case to suggest that none of the land to the east of Failsworth Road should be designated as Open Space on the basis that no PROW pass through this area and there are no local ecological designations / SBIs in this area either.

In short, there is no justification provided as part of the Regulation 19 Plan submission as to why these areas should be identified as public open space on the Policies Map and therefore they should be removed.



Conclusions

Overall, we consider the submitted Local Plan is unsound on the basis that it:

- does not proactively plan for a minimum 15 year plan period,
- does not identify sufficient land in order to be able to demonstrate 5-year supply of deliverable homes; and
- does not include sufficient information / evidence / justification in relation to certain open space designations.

On that basis, we consider the Local Plan should be abandoned/withdrawn notwithstanding the Government's objective to have full Local Plan coverage. Failing that, should the Council choose to proceed with the submission of the plan, and the appointed Inspector accepts that changes can be made via modifications, our view is that the Local Plan will need to be radically altered, and we consider this will require the need to specifically identify sufficient sites to meet the 5-year housing land supply requirement, and additional sites or broad locations where homes required to meet the needs within the 6-15 year period can be met. Such an approach will require extensive consultation and most likely additional evidence base documents to be prepared.

If the need for additional housing land is confirmed, our client would wish to put forward land that we have previously promoted to the north of Woodhouses and which was previously identified by the Council in the 2019 draft version of the GMSF as a suitable housing site under Allocation 22 – Woodhouses – see documents provided at:

- **Appendix 4 – Indicative Landscape and Ecological Framework Plan**
- **Appendix 5 – Landscape and Visual Assessment, 2019**
- **Appendix 6 – 2019 Draft GMSF Woodhouses Site Allocation Policy**

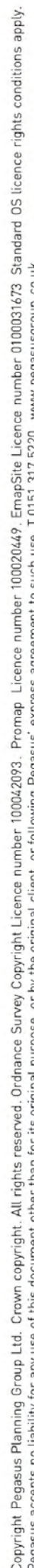
We trust these representations are clear but please do not hesitate to contact me should there be any points of clarification that are required in advance of the plan being submitted to the SoS for examination.

Yours faithfully

Sebastian Tibenham MRTPI
Executive Director

Appendix 3 – Parcels of Land Adjacent to Woodhouses Village that should not be classed as designated Open Space on the basis of no justification / evidence.





WOODHOUSES, OLDHAM

LANDSCAPE & VISUAL ASSESSMENT

PREPARED BY PEGASUS GROUP | MARCH 2019 | P18-1012_REV A

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01 INTRODUCTION

INTRODUCTION

- 1.1 This Landscape and Visual Assessment has been prepared by Pegasus Group in relation to land allocated north of Medlock Road, Woodhouses, Oldham for residential development. The site boundary is illustrated on Figure 1.
- 1.2 The report considers the site and its surrounding context in both landscape and visual terms, to assess the potential effects of the proposed development upon:
 - Landscape features;
 - Landscape character; and
 - Visual amenity.
- 1.3 The assessment has been prepared through a desk study analysis of the site and its landscape policy context as well as a site visit in January 2019 to gain an appreciation of the landscape and visual context.
- 1.4 The assessment has been guided by the Assessment Criteria set out in Appendix A.
- 1.5 Following an initial site visit, it was determined that due to the limited visual envelope of the site, an assessment study area of 1km from the site centre was appropriate and proportionate to the development proposals. Visibility of the proposals is however only available within limited sections of this study area.
- 1.6 The report is supplemented by Appendix B with further commentary from a landscape and visual perspective on the two other Allocation 22 sites in the draft Greater Manchester Spatial Framework (GMSF) as well as a brief discussion on the two existing allocated sites.

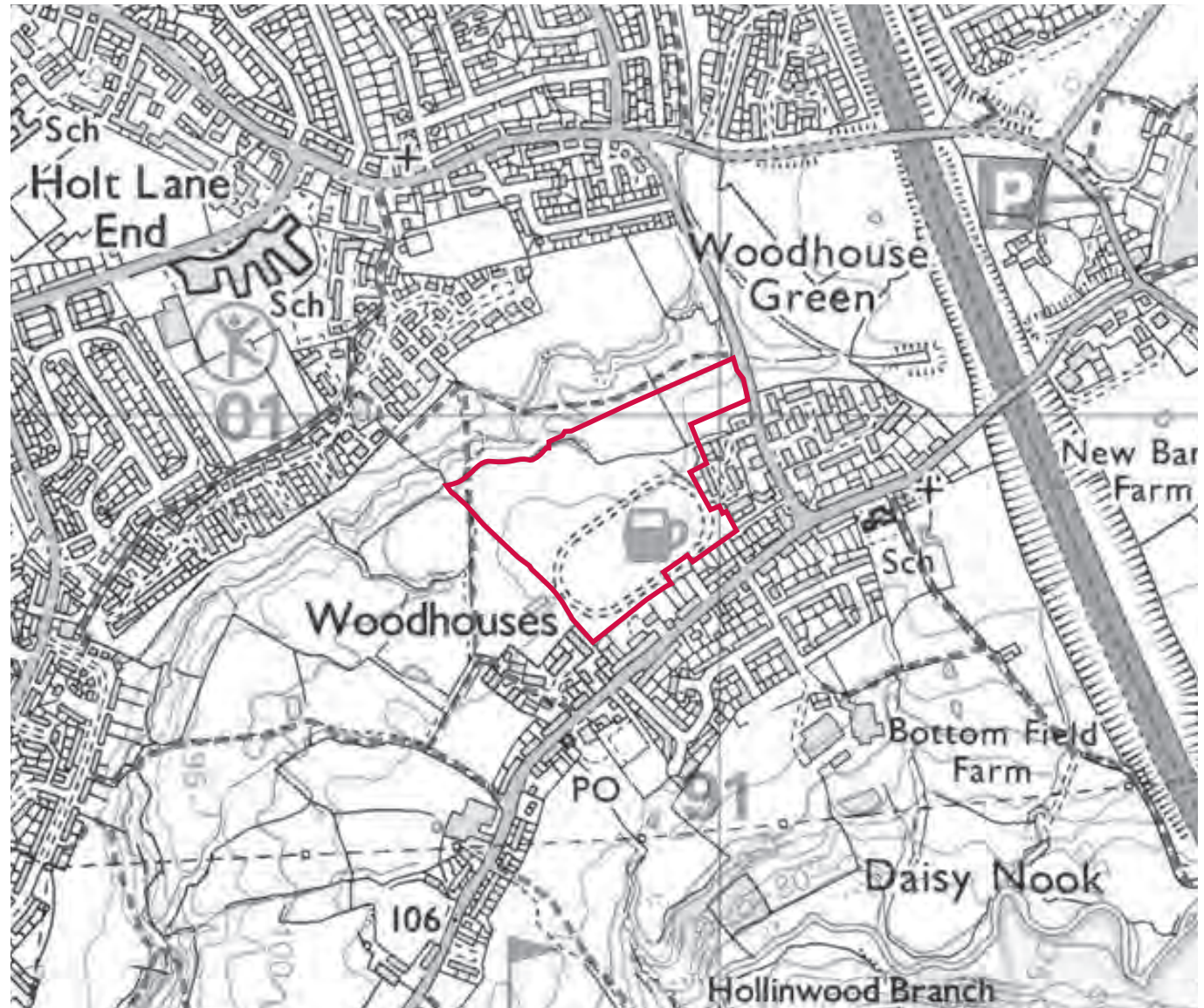


Figure 1: Site Location Plan

02 SITE CONTEXT AND PROJECT DESCRIPTION

SITE CONTEXT AND PROJECT DESCRIPTION

- 2.1 The site is located north of Medlock Road and West of Marston Close in Woodhouses, Oldham, west of the M60. It is bordered primarily by residential properties to the east and south. To the west lie agricultural fields before reaching Lord's Brook and the settlement of Failsworth. Lord's Brook also passes north of the site with Failsworth located beyond this.
- 2.2 The site is mainly comprised of grassland with a large oval track used for equestrian purposes and outbuildings to house horses.
- 2.3 The topography of the site itself is relatively flat. Woodhouses is located on a plateau between the River Medlock valley to the south of the site and Lord's Brook valley to the north. Generally, beyond the site to the north in to Failsworth, the topography remains relatively flat, whilst it rises very gradually to the east. The area beyond the River Medlock to the south is generally quite flat but the landform falls away gradually to the west. In the distant east and south are the Pennines.

KEY

-  Site boundary GM Allocation 22
-  Other GMSF Allocation 22 sites
-  Existing housing allocations
-  Conservation Area
-  Open Space (Local Plan Policy 23)
-  Approximate SBI Boundary

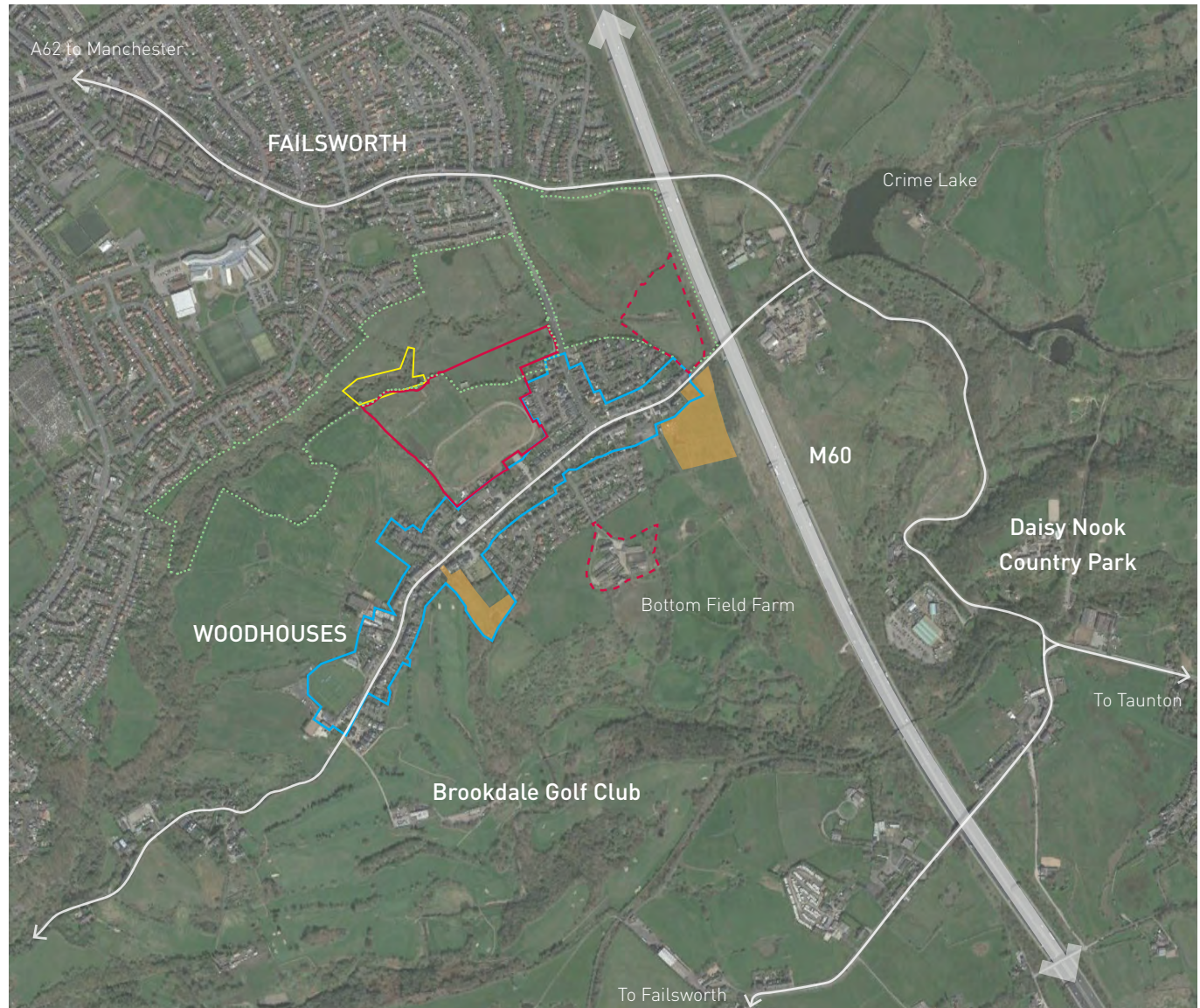


Figure 2: Site Context Plan

03 DESIGNATIONS AND POLICY CONTEXT

DESIGNATIONS AND POLICY CONTEXT

- 3.1 The site is located within Green Belt as illustrated of Figure 3. An Open Spaces allocation, Policy 23 of the adopted Local Plan, crosses in to the northern corner of the site. 'Lord's Brook Flushes' Site of Biological Importance (SBI) brushes against the north western section of the site, as illustrated in Figure 1.
- 3.2 Oldham Conservation Area is located adjacent to the site along part of the eastern boundary and to the south (see Figure 2).
- 3.3 The site falls entirely with Flood Zone 1 and there are no listed buildings within the setting of the application site with the nearest being Diamond Hall Farmhouse (Grade II), located approximately 310m to the south west.
- 3.4 Hollinwood Branch Canal is the nearest Site of Special Scientific Interest (SSSI) located approximately 780m to the south.

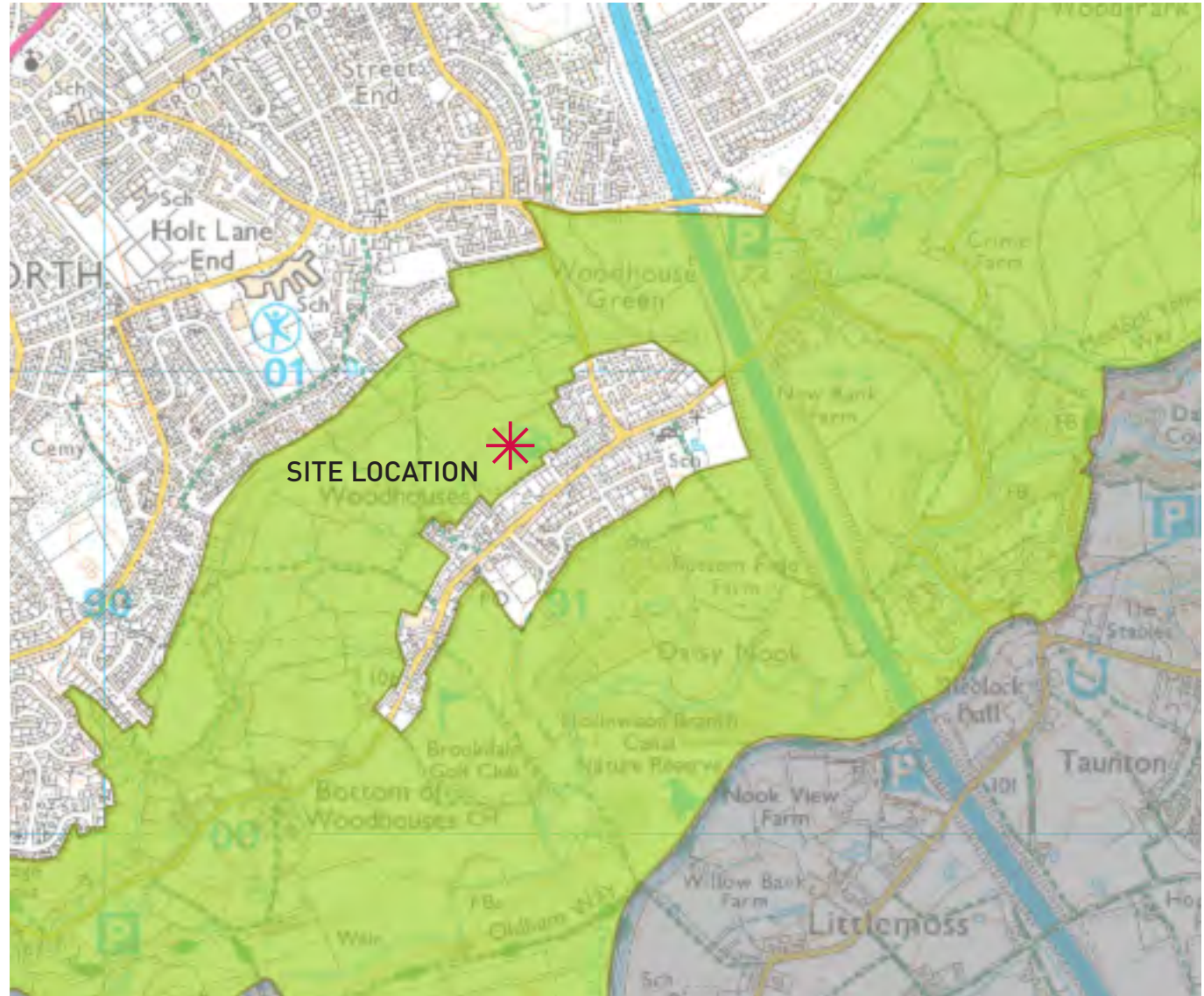


Figure 3: Extract from Oldham Council Joint Core Strategy and Development Management Policies Development Plan (2011) Policies Map

04 LANDSCAPE EFFECTS

INTRODUCTION

- 4.1 The assessment of effects considers the different phases of the development from construction and across the lifetime of the development. Typically, the effects of construction relate to the movements of vehicles and plant, often with orange flashing lights, and the intensification of activity on site during day time hours.
- 4.2 All of the effects of the development considered subsequently are considered to be adverse unless stated otherwise.

LANDSCAPE FEATURES

- 4.3 The assessment of Landscape Effects deals with the changes to the landscape as a resource. Different combinations of the physical, natural and cultural components (including aesthetic, perceptual and experiential aspects) of the landscape and their spatial distribution create the distinctive character of landscapes in different places. Effects are considered in relation to both Landscape Features and Landscape Character, Landform and Topography.

Landform and Topography

- 2.1 The topography of the site itself is relatively flat. Woodhouses is located on a plateau between the River Medlock valley to the south of the site and Lords Brook valley to the north.
- 4.4 There would be limited change to the landform of the site as a result of the proposals.

Land-use and Vegetation

- 4.5 The proposals would result in the development of the southern area of the site as illustrated on Figure

10. This would result in the loss of the equestrian track and an area of rough grassland. The northern section of the site would be reserved as open space and to implement mitigation proposals. An ecological survey would indicate the value of the grassland and the potential for any protected species within the site.

- 4.6 There are a number of existing trees present on site along existing field boundaries. In some places trees appear to have grown from unmanaged hedgerows that are fragmented and in poor condition. Trees should be retained where possible, an arboriculture survey would provide further detail on their condition and would help to inform masterplan proposals at a more detailed stage.
- 4.7 Figure 10 indicates a strong wooded buffer along the northern boundary of the site in keeping with the character of the wooded watercourses in the valley. This buffer would provide a continuation of the riparian trees that follow Lord's Brook. This would help to mitigate the development in views from the north and may also help to improve the view of parts of Woodhouses by also screening existing properties. If it is possible to access the site from Failsworth Road as indicated by Access Option on Figure 9, tree planting could be extended east to further screen views of the access road and properties on Marston Close. Ecological input may be required in terms of planting trees within close proximity to the SBI.
- 4.8 Tree planting throughout the development along streets and within front and rear gardens will also help to development to sit sensitively within the landscape by breaking up development.
- 4.9 Without the information of tree and ecological surveys the sensitivity of the grassland and trees,

as landscape features, are considered to be low. Therefore, the loss of some of these features in the southern area of the site to development would result in a moderate effect on the vegetation of the site.

Buildings and Infrastructure

- 4.10 Built form on the site currently comprises a small stable block and a large open fronted shed.
- 4.11 The proposals would result in the removal of both of these structures with new residential development located to the south of the site. The extent of the site to be developed has been discussed further under sections 06 and 07, but aims to keep built form within an appropriate area of the site so as not to create a jarring extension of the existing settlement.
- 4.12 The sensitivity of the current buildings on site are considered to be low. Therefore, the loss of these features would result in a negligible effect on buildings and infrastructure of the local area.

LANDSCAPE CHARACTER

- 4.13 This section provides an overview of the landscape character of the site and its local surroundings. It also provides an indication of the sensitivity of the landscape character of the site to the proposed development and the resulting effects which would arise during construction.

National Level Landscape Character

- 4.14 At a national level, the (former) Countryside Commission and English Nature classified England into 159 broadly homogenous Landscape Character Areas, providing a picture of differences in landscape character at the national scale.

04 LANDSCAPE EFFECTS



Figure 4: NCA 55 Map

The site and surrounding local landscape falls within National Character Area 55, Manchester Conurbation, as shown in Figure 4.

4.15 This national level assessment gives a broad impression of a region and provides a useful contextual overview of the character of the wider landscape, however, due to the small size of the sites, for the purpose of this assessment a greater degree of focus has been given to the Landscape Character Assessment provided as part of the 'Greater Manchester Landscape Character and Sensitivity Assessment' (GMLCSA).

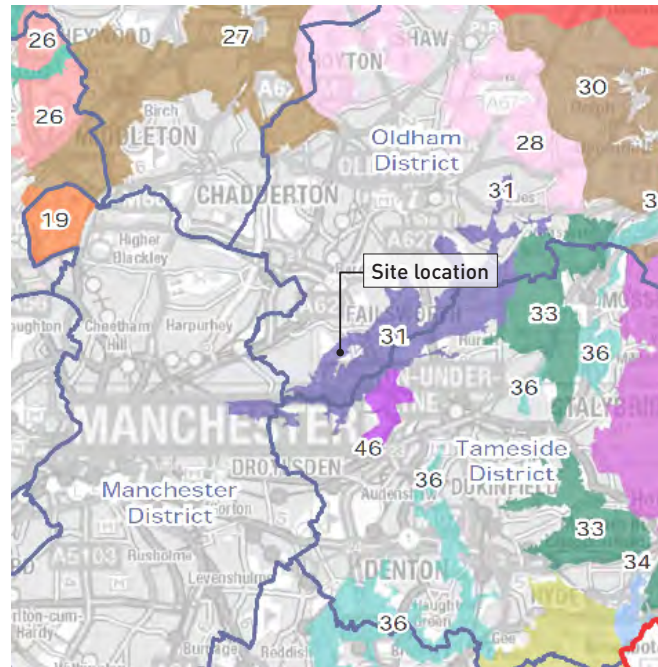


Figure 5: Greater Manchester LCA Map

Local Level Landscape Character

- 4.16 The GMLCSA (August 2018) was produced to provide up-to-date landscape evidence to support the preparation of the Greater Manchester Spatial Framework. Prior to this, landscape character information was detailed in Oldham Council's Landscape Character Assessment 2009. The site fell within Landscape Character Area 6, Medlock Mixed Valley, type 6b Broad Valley Bottom.
- 4.17 The site is located within the updated Landscape Character Type, Incised Urban Fringe Valleys and Landscape Character Area 31, River Medlock of the GMLCSA. The report provides a detailed description of the landscape character area. Key points in

relation to the site and surrounding area have been quoted below:

- *“Typically, narrow, incised valleys cutting through rolling hills which include the Pennine and Dark Peak foothills;*
- *Upstream the rivers and tributaries are typically narrow and fast flowing, forming steep sided V-shape valleys and gorges;*
- *Small tributary cloughs formed by seasonal streams flowing straight down valley sides, characterised by fast-moving streams, pools and falls;*
- *Small to medium pastoral fields and horse paddocks on the valley sides and areas of wet grassland and scrub along the valley floor. Some arable fields are found on the drier, flatter ground on the valley floors.;*
- *A significant amount of the land with the valleys is used for recreation with amenity grassland associated with golf courses, frequent playing fields and Country Parks;*
- *Valleys typically traced by riparian woodland with banks of dense broadleaved woodland (some ancient), distinctive moss-covered trees and a wildflower-rich understorey*
- *Woodland and areas of parkland create important wildlife corridors between densely populated urban areas, with significant areas designated as Sites of Biological Importance (SBIs) and managed as Local Nature Reserves (LNRs)*
- *Modern and historical industrial complexes, recreational buildings, scattered farmsteads and small settlements connected by winding lanes. Some steeper areas are inaccessible by road*
- *The valleys are typically overlooked adjacent urban areas, with some redevelopment sites for housing located on exposed ridges,*

04 LANDSCAPE EFFECTS

emphasising their close proximity to densely populated areas

- *Major rail and road routes, including the M60, M66, M67 and M6 cross and run partly through some of the valleys. These linear features incorporate extensive cuttings, embankments, bridges and junctions*
- *Networks of footpaths criss-cross the valleys. Some are formal public rights of way; others simply desire lines running from the surrounding urban areas*
- *Views are typically contained by the steep valley sides and woodland. From the more elevated locations along the valley sides there are views to the surrounding Pennine uplands (including the Peak District National Park) and over Greater Manchester*
- *While proximity to urban areas, transport and other infrastructure can significantly affect their character, the narrow valley landforms and often dense woodland cover provide a sense of seclusion and tranquillity*
- *Major transport infrastructure can sever the valleys' visual unity, influence local views and break perceptions of tranquillity and the small landform scale. Large pylons frequently dominate views".*

4.18 The assessment goes on to discuss the intactness and condition of the landscape character type. It was apparent from the site visit that the landscape both within and around the site was in line with much of the description in the report. Points include: areas strongly influenced by the visual presence of the adjoining urban edge, a decline in landscape management detracting from parts of the landscape, neglect of hedgerows and their replacement with post and wire fencing, subdivided horse paddocks and motorbike use.

4.19 The assessment gives the following sensitivity ratings to each of the criteria below for the landscape character area as a whole:

- Physical character (including topography and scale): **Medium-High**
- Natural character: **Medium-High**
- Historic landscape character: **Medium**
- Form, density and setting of existing settlement / development: **Medium High**
- Views and visual character including skylines: **Medium-High**
- Access and recreation: **High**
- Perceptual and experiential qualities: **Medium**

4.20 The overall landscape sensitivity rating is split between 2-3 storey residential housing developments: **medium- high** and commercial/ industrial developments: **high**.

4.21 These sensitivity ratings wouldn't necessarily apply at a site level as discussed further in the section below.

Existing Landscape Character of the Site and its Sensitivity to Development

4.22 The character of the site is influenced by the close proximity of development from the settlement of Failsworth to the north and Woodhouses located immediately adjacent to the south and eastern site boundaries. The site comprises rough grassland with generally unmanaged, fragmented field boundaries, several outbuildings for equine use and a 'trotting' track. The northern portion of the site is more in character with the undeveloped landscape associated with Lord's Brook valley.

4.23 In Landscape and Visual Impact Assessment,

sensitivity is assessed through a consideration of both the susceptibility to a development of the type proposed and the value attached to the landscape. In the case of the potential for effects on landscape character, susceptibility means the ability to accommodate the proposed development without undue consequences for the existing characteristics of the site.

4.24 The susceptibility of the landscape character of the site to a development of the type proposed is considered to be **medium-low**, on the basis that the site is heavily influenced by existing built form to the north, east and south as well as further afield to the west with views of buildings in Manchester City centre available from some locations. The northern boundary is open and more sensitive to development with views of the site available particularly from the southern settlement edge of Failsworth. The northern corner of the site is designated under the Open Spaces Policy 23 in the adopted Local Plan, as is the wider area to the north and west. Appropriate landscape design will be required to both mitigate this and accommodate this policy. Development of an appropriate area of the site would not be perceived as a dramatic change in the landscape if suitable mitigation measures are implemented.

4.25 What is meant by the value of the landscape in a Landscape and Visual Impact Assessment is the relative value that is attached to the landscape by society as a whole, bearing in mind that different stakeholders may have differing values regarding any given landscape. Consideration of whether there are any formal landscape designations covering a landscape is one element of considering the value, but also relevant is the condition of the landscape, its rarity in the local area, the recreational value it provides, and any ecological

04 LANDSCAPE EFFECTS

or heritage importance the landscape may hold. These are considered alongside its perceptual qualities (such as tranquillity) and any associations which may be held with the landscape, such as if it has been highlighted in art, music or poetry.

- 4.26 The site is designated as Green Belt. The northern boundary overlaps slightly with the locally designated Lord's Brook Site of Biological Importance and Open Spaces Policy 23 (see Figure 2) There are no Listed Buildings or identified historical or ecological interests directly associated with the site. It is not traversed by any public rights of way and is of a nature which is not rare in the local landscape. On balance therefore, it is judged that the landscape value of the site is **medium**.
- 4.27 Overall, the site is considered to be of **medium** sensitivity to the proposed development.

Effects on Landscape Character

- 4.28 Changes to landscape character will inevitably be experienced within the site, and the immediate area surrounding it within LCA '31, River Medlock' as a result of the changes to landscape elements within the site.

The site

- 4.29 The most extensive change in landscape character will occur within the development site boundary, particularly to the south of the site. The magnitude of change during construction is considered to be **medium** due to the additional movement of staff, machinery and materials within, in to and out of the site which currently used for equine purposes. During operation the magnitude of change is considered to be **low** if the site is developed within the parameters set out in Figure 10. This illustrates

how the site could be developed to ensure it sits well on the periphery of Woodhouses with minimal impact on landscape character, visual receptors and existing designations. Ensuring that development is at an appropriate density and scale and sited well in relation to the existing settlement boundary will be key in delivering a development of this type at this site.

- 4.30 The overall landscape effect on the site is considered to be **moderate** during construction and **minor-moderate** during operation.

The wider landscape

- 4.31 Within the wider Landscape Character Area '31, River Medlock', the magnitude of change during both operation and construction is considered to be **very low**. This is due to the small scale of the site within the wider landscape area. The nature of the topography associated with the wooded valleys in the landscape character area, the M60 corridor passing through the LCA and surrounding urban development restricts the effect the site will have of the wider landscape character area due to the level of containment that these features provide. The proposals have very limited impact on the physical and perceptual attributes of the landscape at this scale. The overall landscape effect on LCA '31, River Medlock' is **negligible**.

05 VISUAL EFFECTS

INTRODUCTION

- 5.1 An assessment of visual effects considers the potential for changes in views and visual amenity. The aim is to establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected, and the nature of the views and visual amenity (meaning the overall quality and pleasantness to a view).
- 5.2 In the case of the proposed development, the extent of the areas from which the scheme may be visible is very limited. The area with most visibility of the site is to the north along the Lord's Brook corridor south of Failsworth. Beyond this views are restricted by the settlement of Failsworth and to the south restricted by the settlement of Woodhouses. To the east vegetation, topography and the M60 restrict views. Topography, vegetation and the suburbs west of Manchester contain views from the west.
- 5.3 Views would potentially extend to only a very small area, as indicated in Figure 6. The approximate area of visibility shown in blue is based on the assessment work undertaken on site. Where some areas were not publicly accessible, assumptions have been made based on the existing landform, tree cover and built form as to the likely locations of visibility.
- 5.4 Potential visual receptors are discussed in turn below.

Views from the local road Network

- 5.5 There are limited opportunities for views of the site from the local road network. Failsworth Road is located west of the site. Views are available

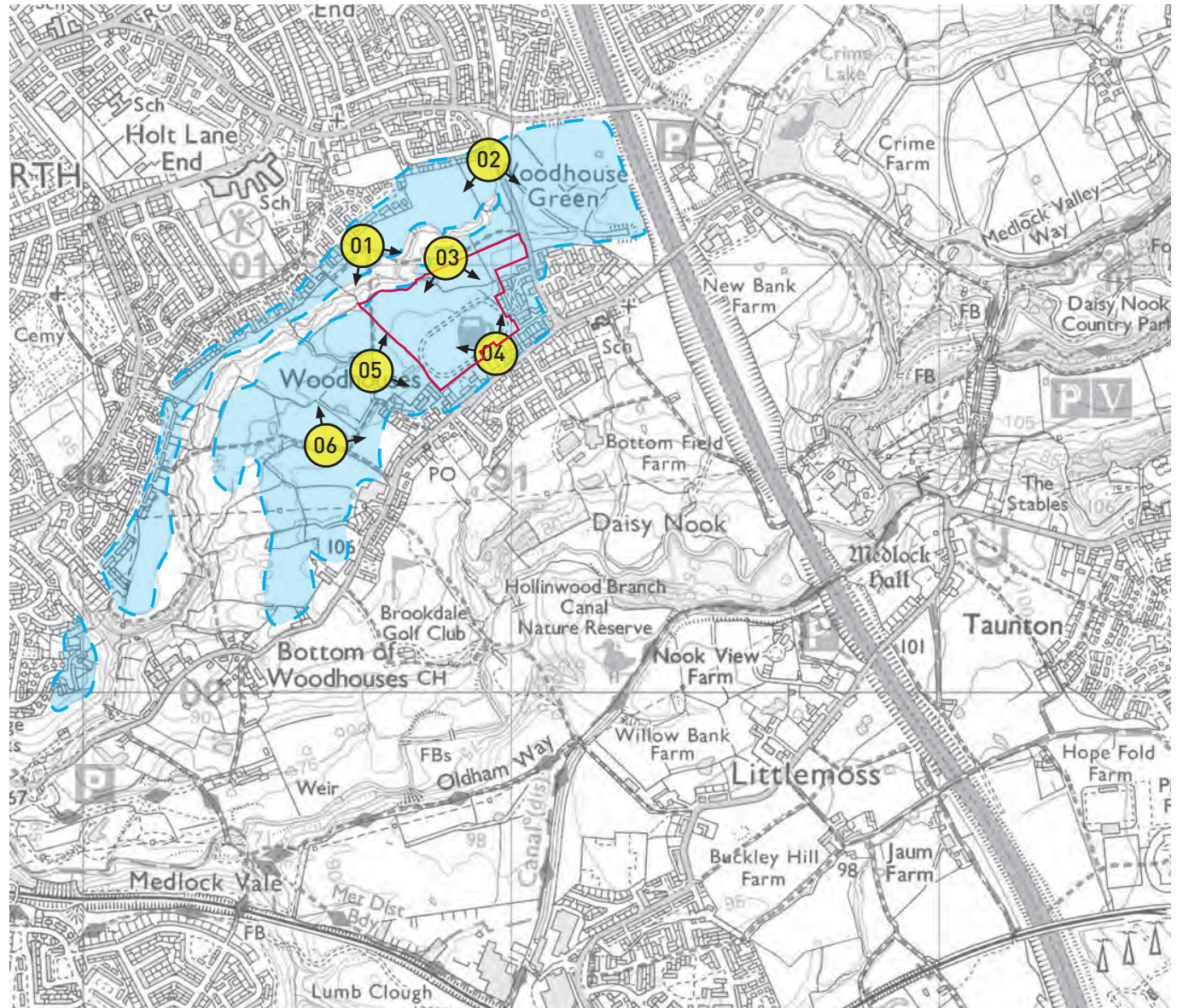


Figure 6: Viewpoint Plan with Approximate Area of Visibility (blue)

05 VISUAL EFFECTS

from some locations where gaps in vegetation allow when travelling north to south in to Woodhouses. To the north views from some of the residential roads along the southern edge of Failsworth may be possible through gaps between existing residential properties but the site is generally screened. Medlock Road runs through Woodhouses south of the site, views of the site are restricted due to the existing built form lining the road.

Views from the Public Rights of Way (PRoW) Network

- 5.6 Views from footpaths are most likely from several locations to the north, west and south west. The Public Rights of Way are highlighted in Figure 7 with reference numbers. Where intervening vegetation and topography doesn't restrict, receptors travelling on footpaths 34, 34A, 36, 37, 42 and 44 are all likely to experience views to some degree from some parts of these footpaths when travelling towards the site. Views from several of these paths are demonstrated in the assessment below.

Views from Residential Properties

- 5.7 Views from residential properties are limited to those that lie on the borders of the existing settlements surrounding the site. Figure 8 illustrates the potential residential receptors.
- 5.8 Properties on the southern edge of Failsworth (A) are a mix of one and two storey homes, some are orientated to the south whilst others are on an east west orientation, with the main windows and gardens focused away from the landscape along Lord's Brook. The garden boundaries that form the southern extent of the settlement are mixed, some are open with views towards Woodhouses whilst

others are more enclosed with garden planting. Some properties may experience views of the site between vegetation that is present within the Lord's Brook valley area, particularly from upper floor windows.

- 5.9 Existing residential properties on the northern edge of Woodhouses (B) may experience views from rear gardens and windows where vegetation within gardens and the wider landscape does not prevent them. As the site borders the settlement along this boundary it is inevitable that the properties immediately adjacent to the site will have views of the development.
- 5.10 Some properties on Marston Close (C) that back on to the eastern boundary of the site will experience views of the development.
- 5.11 It is possible that some properties on Failsworth Road (D) will have glimpsed views of the site between existing properties on the opposite side of the road.

Views from other Recreation Sites

- 5.12 The area north, north-east and west of the site is classed as Open Space (Figure 2) in the adopted Local Plan. Much of this area is accessible to the public for informal recreation. Views from parts of this area towards the site are available from some locations whilst in other views are restricted by landform and vegetation.

REPRESENTATIVE ASSESSMENT VIEWPOINTS

- 5.13 A series of viewpoints were selected during the initial site work and are presented with commentary in relation to the proposal below. The viewpoints have been selected to represent a range of views



Figure 7: Public Rights of Way

from the landscape surrounding the site and their locations are set out on Figure 6.

Viewpoint 01

- 5.14 This viewpoint was taken from the southern edge of Failsworth from footpath 34, looking south towards Woodhouses with existing properties visible beyond the site. It illustrates a typical view that residential and footpath receptors may experience from the north of the site. The site is visible beyond Lord's Brook and is located between the properties on Marston Close to the boundary behind the stable block within the site on the western boundary. The approximate horizontal extent of the site from this location is indicated on the photograph. The northern boundary is visible as the land rises up

from the brook.

- 5.15 Views of the site across the northern boundary are quite open from this location, as the land rises gradually towards Woodhouses the southern boundary of the site and properties along Medlock Road are visible. Identifying an appropriate extent for development parcels in relation to this boundary will be important allowing for a suitable buffer and gradation between Lord's Brook and the development.
- 5.16 The viewpoint is located relatively close to the northern site boundary at around 130m at the closest point. Development to the extent set out in Figure 10, would appear at a similar scale to the properties highlighted on Marston Close on the photograph. The extent to which the proposed development extends beyond the existing line of development should be considered carefully along with landscape mitigation proposals so that any new development does not form too dominant a feature in views of this nature.
- 5.17 From this location, a development set within the parameters shown in Figure 10, the sensitivity is considered to be high and there would be a medium magnitude of change. The overall visual effect is considered to be moderate.

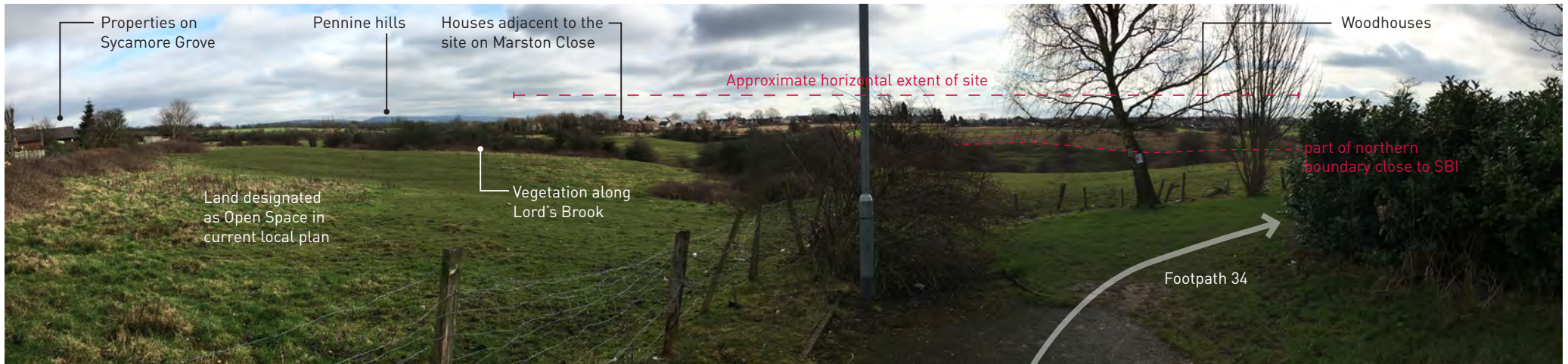
Viewpoint 02

- 5.18 This viewpoint was taken from Failsworth Road adjacent to residential properties on Argyll Park Road looking south west. The view represents that which may be experienced by road users travelling south in to Woodhouses and from properties south of Argyll Park Road. Existing properties in Woodhouses are visible on the horizon amongst existing vegetation. Vegetation associated with



Figure 8: Potential Residential Receptors

05 VISUAL EFFECTS



Viewpoint 01: View from footpath 34 looking south from the southern settlement edge of Failsworth



Viewpoint 02: View from Failsworth Road adjacent to properties on Argyll Park Road looking south

Lord's Brook is visible in the foreground along with poorly managed hedgerows and post and wire fencing.

- 5.19 Some parts of the site are visible between existing vegetation although the western part of the site is almost entirely screened. Development would appear in the view at a similar scale to the properties of Marston Close.
- 5.20 From this location, a development set within the parameters shown in Figure 10, the sensitivity is considered to be medium-high and there would be a low-medium magnitude of change. The overall visual effect is considered to be moderate-minor.

Viewpoint 03

- 5.21 Viewpoint 03 was taken from Woodhouses Gardens Pub car park adjacent to the pub garden looking north. It represents the view that may be experienced from residential properties and their curtilages north of Medlock Road. Clear views are available of the southern settlement edge of Failsworth. The land slopes very gradually towards the northern boundary and Lord's Brook.
- 5.22 The western boundary is identifiable by the stables that are located along it. The eastern boundary is defined partly by the rear gardens of properties on Marston Close. These features are highlighted on the viewpoint photograph for reference.
- 5.23 From this location the sensitivity is considered to be high and there would be a high magnitude of change and an overall visual effect of major.

Viewpoint 04

- 5.24 This viewpoint was taken from footpath 34A looking south. Existing residential properties

in Woodhouses are visible on some parts of the skyline and between existing vegetation. The northern boundary runs within close proximity to the footpath. The northern boundary is not defined by any particular feature in this location.

- 5.25 The parameters set out in Figure 10 would see development extended to a similar extent as the existing built form located around Marston Close.
- 5.26 From this location the sensitivity is considered to be high and there would be a high magnitude of change and an overall visual effect of major but with neutral effect once mitigation planting matures along the northern boundary.

Viewpoint 05

- 5.27 This viewpoint was taken from footpath 34 looking west. The western boundary is defined by the broken row of trees visible in the middle distance. The stable block located within the site and the rooftops of properties around Marston Close are visible through gaps in the boundary. Properties on Withins Hall Road are located on the right-hand side of the view, whilst the settlement edge of Failsworth is located beyond the northern extents of the site.
- 5.28 The approximate horizontal extent of the site is indicated on the viewpoint photograph. Strengthening of the western boundary in terms of tree planting would ensure a good level of filtering of development in views from the west.
- 5.29 From this location the sensitivity is considered to be high and there will be a low magnitude of change. The overall visual effect is considered to be moderate-minor.

Viewpoint 06

- 5.30 Viewpoint 06 was taken from footpath 36 looking west. The western boundary is identifiable by the fragmented and overgrown hedgerow labelled on the viewpoint photograph. The stable block located on the western boundary is visible through the broken boundary vegetation. Properties on Withins Hall Road are located in the foreground, whilst the settlement edge of Failsworth is prominent on the left-hand side of the view. Parts of Oldham are visible in the distance.
- 5.31 The approximate extent of the western site boundary is identified on the viewpoint photograph. As discussed under viewpoint 05 it would be beneficial to strengthen planting along the western boundary to screen views of development and ensure the development doesn't appear as a discordant extension of the settlement.
- 5.32 From this location the sensitivity is considered to be high and there will be a low magnitude of change that could fall to negligible with appropriate planting to the western boundary. The overall visual effect is considered to be minor.

05 VISUAL EFFECTS



Viewpoint 03: View looking north from Woodhouse Gardens Pub carpark adjacent to the garden area



Viewpoint 04: View looking south from footpath 34A

05 VISUAL EFFECTS



Viewpoint 05: View from footpath 34 looking east



Viewpoint 06: View from footpath 36 looking north east

06 OPPORTUNITIES AND CONSTRAINTS

6.1 The plan opposite summarises the key findings of this assessment in plan form, identifying areas most suitable for development and those that are more sensitive.

Constraints:

- Existing open space designation to the north but not all of it is accessible to the public
- Some open views from the settlement edge of Failsworth to the north
- Some open views from the Open Space north and west of the site
- Northern and western site boundary sensitive in the immediate landscape to the north and west
- Southern and Eastern boundaries with existing residential development and views over the site
- SBI briefly crosses the northern site boundary
- Site close to Lord's Brook corridor

Opportunities

- Development of the southern portion of the site could form a logical and appropriate extension to Woodhouses
- Potential to improve the landscape in the northern area of the site and mitigate any open space loss with new open space provision.
- potential for new connections from the proposed development to existing footpaths and open space areas
- Potential to improve some views towards Woodhouses from the Open Space and settlement edge of Failsworth through mitigation proposals
- Various potential access options



Figure 9: Opportunities and Constraints

07 DEVELOPMENT PARAMETERS

- 7.1 The adjacent plan translates the information from Figure 9 to provide a guide for a more detailed landscape framework plan.
- 7.2 The area remaining to the north of the proposed development plot is retained as open space so as not to impact on the existing SBI or Open Space designations. This also provides significant space for landscape improvement and mitigation works.
- 7.3 Additional tree planting along the northern boundary will be in character with the woodland that follows the watercourses in the vicinity and will help to mitigate the development in views and effects on landscape character from the Open Space to the north along with the southern settlement edge of Failsworth. Views and effects on landscape character to the west will be mitigated by strengthening the western site boundary with tree planting,

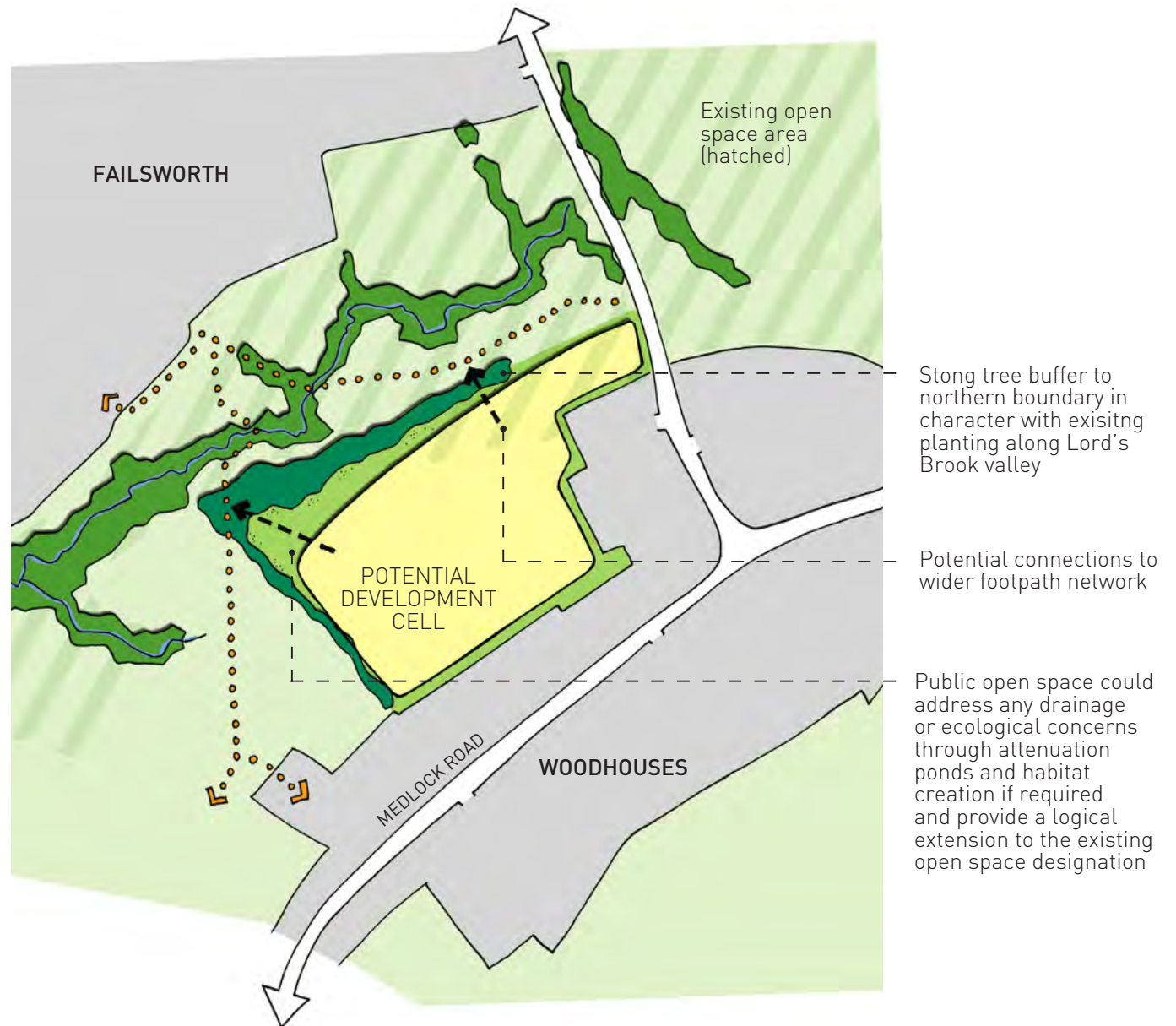


Figure 10: Opportunities and Constraints

08 CONCLUSIONS

- 8.1 In summary, the site comprises rough grassland, a track used for exercising horses, stables and a large open fronted outbuilding. It is bound to the south by the existing settlement of Woodhouses and partially to the east. The northern boundary runs just south of Lord's Brook close to the settlement of Failsworth. Whilst to the west are fields with Failsworth beyond.
- 8.2 The site has strong urban influences from the existing settlements of Woodhouses and Failsworth that are prominent in the landscape in views within and around the site. The northern area of the site is the most sensitive due to the close proximity to Lord's Brook, the SBI, existing rights of way and Open Space allocated in the local plan.
- 8.3 Visually, the site is very well contained to the south by the existing built form of Woodhouses. Within the Open Space north of the site and from footpaths within it views in to the site can be open. Beyond this, to the north, views of the site are generally prevented by the built form of Failsworth. To the east views are generally restricted by existing vegetation, changes in topography and existing built form. There are some views of the site from footpaths in the west.
- 8.4 Overall the site has the potential to be developed sensitively within the existing landscape as an appropriate and logical extension to the existing settlement of Woodhouses. The space retained to the north provides the opportunity to improve the landscape associated with the site and mitigate the development from a landscape character and visual perspective. It allows the improvement of connections to the existing footpath network and open space north of the site.

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APPENDIX A - ASSESSMENT APPROACH

INTRODUCTION

- A.1 The appraisal has been undertaken with regard to best practice, as outlined in the following published guidance:
- A.2 Guidelines for Landscape and Visual Impact Assessment (3rd edition) - Landscape Institute/ Institute of Environmental Management and Assessment (2013)
- A.3 Landscape Character Assessment Guidance for England and Scotland - (2002) Countryside Agency / Scottish Natural Heritage
- A.4 The Guidelines for Environmental Impact Assessment - (2011) Institute for Environmental Management and Assessment
- A.5 Photography and Photomontage in Landscape and Visual Impact Assessment – Landscape Institute Advice Note 01/11

LANDSCAPE ELEMENTS AND CHARACTER ASSESSMENT METHODOLOGY

- A.6 A baseline landscape assessment was carried out to determine the current elements and character of the landscape within and surrounding the site. This involved an initial desktop study of:
 - Ordnance survey maps at 1:50,000, 1:25,000 scales;
 - Aerial photographs of the site and surrounding area;
 - Datasets for rural designations from the MAGIC website (Multi Agency Geographic Information for the Countryside);

- Relevant planning policy; and
- National and local scale landscape character assessments.

VISUAL ASSESSMENT METHODOLOGY

- A.7 The assessment of visual effects was undertaken on the basis of viewpoint analysis as recommended in best practice guidelines. The viewpoints which are in different directions from the site and are at varying distances and locations were selected to represent a range of views and visual receptor types.
- A.8 The viewpoints are representational and not exhaustive. They are taken from publicly accessible land and not from any third party, private, land.
- A.9 The viewpoints were used as the basis for determining the effects of visual receptors within the entire study area. The viewpoints were photographed at 1.7 metres above ground level.

ASSESSMENT CRITERIA

- A.10 The scale of importance of effects is ascertained by cross referencing the sensitivity of the baseline landscape or visual receptor and the magnitude of change as a result of the development.

Sensitivity of Landscape Features

- A.11 Sensitivity is determined by a combination of the value that is attached to a landscape feature or element and the susceptibility of the landscape feature/element to changes that would arise as a result of the Proposed Development – see Pages

88-90 of GLVIA3.

Magnitude of Change on Landscape Features

- A.12 Professional judgement has been used to determine the magnitude of direct physical impacts on individual existing landscape features as follows:

Criteria of Magnitude of Change for Landscape Features

- *Very Low* - No loss to part of an existing landscape feature
- *Low* - Very minor alteration to part of an existing landscape feature
- *Medium* - Minor loss or alteration to part of an existing landscape feature
- *High* - Some loss or alteration to part of an existing landscape feature
- *Very High* - Total or major loss of an existing landscape feature

Sensitivity of Landscape Character

- A.13 The sensitivity of landscape character is an expression of a landscapes capacity to accommodate change. It varies depending on factors such as the scale and form of the landscape, landscape pattern, sense of enclosure, sense of tranquillity and remoteness, the settlement pattern and transport network etc. The sensitivity of landscape character is described as high, medium or low and is determined by the

combination of the value of the landscape and the susceptibility of the landscape to change resulting from this particular type of development.

Magnitude of Change on Landscape Character

- A.14 Professional judgement has been used to determine the magnitude change on landscape character as follows:

Criteria for magnitude of change for landscape character

- *Very Low* - No notable loss or alteration to existing landscape features; no notable introduction of new features into the landscape; and negligible change to the key physical and/or perceptual attributes of the landscape.
- *Low* - Minor loss or alteration to existing landscape features; introduction of minor new features into the landscape; or minor alteration to the key physical and/or perceptual attributes of the landscape.
- *Medium* - Some notable loss or alteration to existing landscape features; introduction of some notable new features into the landscape; or some notable change to the key physical and/or perceptual attributes of the landscape.
- *High* - A major loss or alteration to existing landscape features; introduction of major new features into the landscape; or a major change to the key physical and/or perceptual attributes of the landscape.
- *Very High* - Total loss or alteration to existing landscape features; introduction of dominant new features into the landscape; a very major change to the key physical and/or perceptual attributes of the landscape.

Sensitivity of Visual Receptors

- A.15 Representative viewpoints have been used in the assessment to represent different visual receptor groups at various distances and directions from the site. In general it is recognised that receptors such as recreational users of public rights of way, visitors to heritage sites or people at recognised vantage points have a higher susceptibility to change than people travelling along roads, engaged in sports or at their place of work.

- *Very Low* - People engaged in industrial and commercial activities or military activities.
- *Low* - People at their place of work (e.g. offices); short - medium stay patients at hospital, shoppers; users of trunk/major roads and passengers on commercial railway lines (except where these form part of a recognised and promoted scenic route).
- *Medium* - Users of public rights of way and minor roads which do not appear to be used primarily for recreational activities or the specific enjoyment of the landscape; recreational activities not specifically focused on the landscape (e.g. football); motel users.
- *High* - Residents at home; users of long distance or recreational trails and other sign posted walks; users of public rights of way and minor roads which appear to be used for recreational activities or the specific enjoyment of the landscape; users of caravan parks, campsites and 'destination' hotels; tourist attractions with opportunities for views of the landscape (but not specifically focused on a particular vista); slow paced recreational activities which derive part of their pleasure from an appreciation of setting (e.g. bowling, golf); allotments.

- *Very High* - People at recognised vantage points (often with interpretation boards), people at tourist attractions with a focus on a specific view, visitors to historic features/ estates where the setting is important to an appreciation and understanding of cultural value.

Magnitude of Change on Visual Amenity

- A.16 Professional judgement has been used to determine the magnitude change on landscape character as follows:

Criteria for magnitude of change for visual receptors

- *No Effect* - No change in the view
- *Negligible* - No notable change in the view.
- *Low* - Some change in the view that is not prominent / few visual receptors affected
- *Medium* - Some change in the view that is clearly visible and forms an important but not defining element in the view
- *High* - Major change in the view that has a defining influence on the overall view / many visual receptors affected

Impact - Scale of Importance

- A.17 The importance of the landscape and visual effects is determined by cross referencing the sensitivity of the landscape element, landscape character or view with the magnitude of change. The overall effects are described as *substantial*, *major*, *moderate*, *minor* or *negligible*. All effects, unless otherwise stated, are assessed as adverse.

APPENDIX B - APPRAISAL OF OTHER ALLOCATED SITES IN WOODHOUSES

- B.1 The adjacent plan has been replicated from earlier in the report for ease of reference in relation to the other Allocation 22 sites within the draft Greater Manchester Spatial Framework.
- B.2 This appendix aims to provide a brief appraisal of each of the sites from a landscape and visual perspective in relation to development for residential use.
- B.3 The site north of Ashton Road will be referred to as 'site A' and the site at Bottom Field Farm will be referred to as 'site B'.

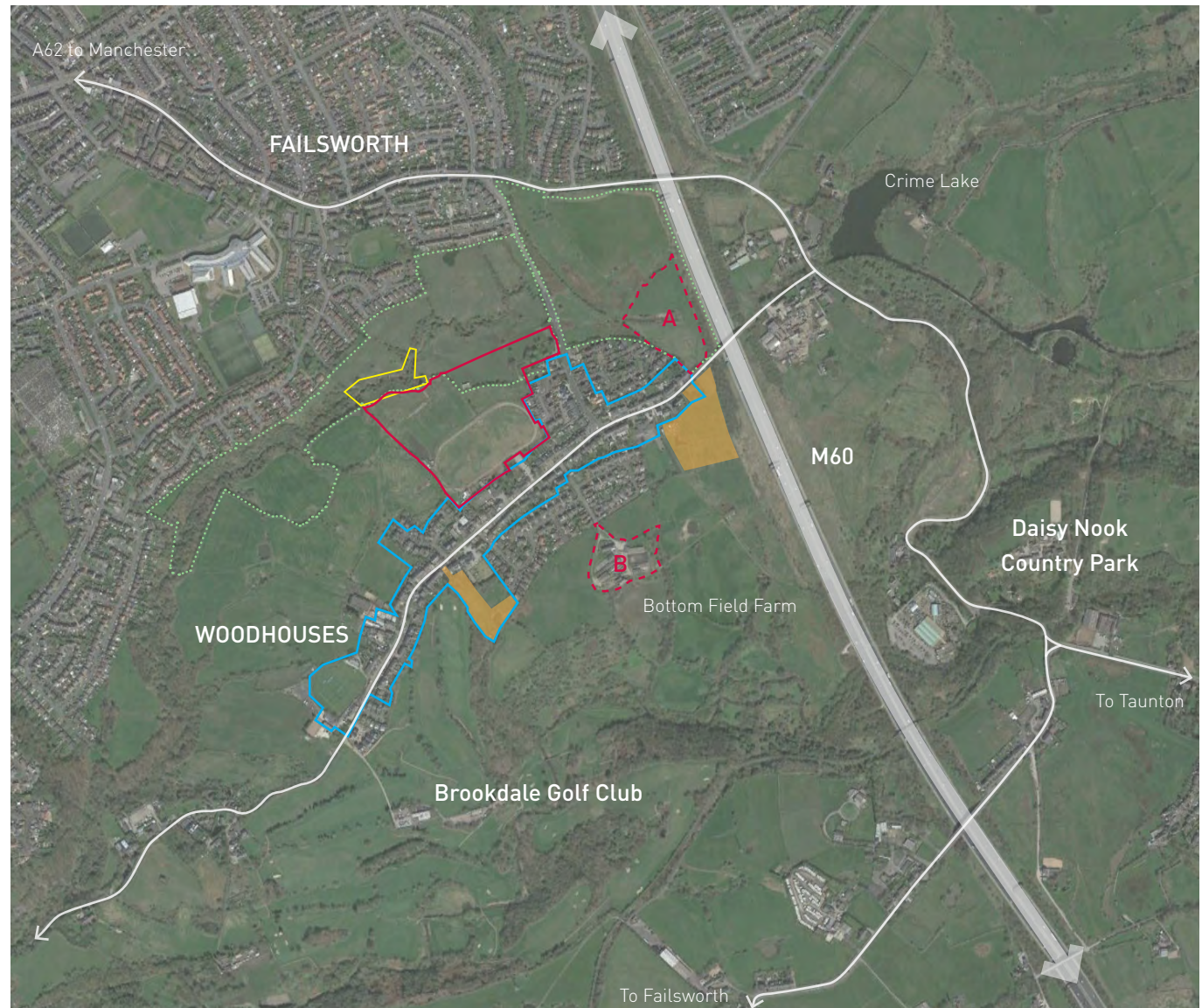
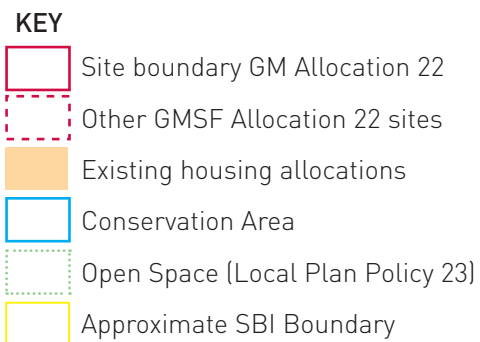


Figure 11: Site Context Plan

APPENDIX B - APPRAISAL OF OTHER ALLOCATED SITES IN WOODHOUSES



Figure 12: Site A - Approximate Boundary

SITE A

Site Context

- B.4 The site comprises a triangular field located immediately west of the M60, north of Ashton Road adjacent to existing properties on Farmstead Close.
- B.5 The eastern boundary is defined by a tree belt that runs along the cutting of the M60. The north western boundary is fairly open with some trees along the eastern section, the remainder defined by a post and wire fence. Properties on Farmstead Close define the south western boundary. Ashton Road runs along the southern boundary where there is a row of trees and a field gate providing access to the site.

- B.6 The site is generally flat with a gentle fall to the north.

Designations

- B.7 The site is located within the Green Belt. It is also located within Open Space (Policy 23 of the adopted Local Plan). There are no other designations within the site. Woodhouses Conservation Area borders part of the site to the south.

Landscape

- B.8 The site is located within Landscape Character Type, Incised Urban Fringe Valleys and Landscape Character Area 31, River Medlock of the Greater Manchester Landscape Character and Sensitivity Assessment.

- B.9 The assessment provides overall landscape sensitivity rating for 2-3 storey residential housing developments within this landscape character area as **medium- high**.

- B.10 This rating wouldn't necessarily apply at a site level due several factors including the proximity to urbanising features such as the existing settlement of Woodhouses and the M60.

- B.11 The northern half of the site is more sensitive to development than the south as it protrudes out from the existing settlement edge and is likely to be viewed more easily from some locations in the surrounding landscape.

Visual

- B.12 The following section provides a brief commentary on the potential visual issues associated with developing the site for housing. Several photographs have been taken to demonstrate the nature of views

from potential receptors around the site and are illustrated on the following page.

- B.13 Views from the east are restricted by the tree belt that runs along the embankment of the M60. From the south views are available from a short section on Ashton Road immediately east of Woodhouses, as shown on photograph A at the field gate.

- B.14 From the south west views are prevented by existing residential development in Woodhouses, however, receptors living in properties on Farmstead Close that back on to the site may have views of the development. Photograph B shows the character of the housing on Farmstead Close and through gaps in the dwellings the view that they have of the open space beyond.

- B.15 Photograph C illustrates the view from Cutler Hill Road, just south of the settlement edge of Failsworth. The landform south of the road rises slightly obscuring views towards the site. Some existing residential properties on Farmstead Close are visible where the landform drops very slightly to the west.

- B.16 There are no public footpaths within the open space north of the site. It is unlikely that views of the site will be available from other rights of way to the south or west of the site.

Summary

- B.17 In summary based on the brief appraisal of the site and its surroundings, an area indicating an approximate appropriate extent for development has been shown on Figure 12. This is an around 0.8ha and could deliver around 28 homes, however a full LVIA would be required as part of an iterative design process to inform the most appropriate level of development.

APPENDIX B - APPRAISAL OF OTHER ALLOCATED SITES IN WOODHOUSES



APPENDIX B - APPRAISAL OF OTHER ALLOCATED SITES IN WOODHOUSES



SITE B

Site Context

- B.1 The site comprises an irregular shaped plot, consisting of the curtilage of Bottom Field Farm south of the settlement boundary of Woodhouses. The site contains a small block of terraced properties perhaps converted from the farm property that dates back to the earliest available map of 1848. There are also a number of sheds associated with the farm.
- B.2 All of the boundaries except the western, are relatively open, defined by a mix of hedgerows, scattered trees, scrub and farm sheds. The eastern boundary is defined by riparian vegetation

associated with a small brook feeding in to the River Medlock.

Designations

- B.3 The site is located within the Green Belt which encompasses the site on all sides. There are no other designations within the site. Woodhouses Conservation Area is located around 105m north of the site.

Landscape

- B.4 The site is located within Landscape Character Type, Incised Urban Fringe Valleys and Landscape Character Area 31, River Medlock of the Greater Manchester Landscape Character and Sensitivity Assessment.
- B.5 The assessment provides overall landscape sensitivity rating for 2-3 storey residential housing developments within this landscape character area as **medium- high**.
- B.6 This rating may apply to this site due to the detached nature of the site from the existing settlement and being surrounded by Green Belt. The River Medlock valley has a strong influence on the character of the landscape to the south of Woodhouses, however there are some urbanising features including the M60 that is visible from some locations and the urban edge of Woodhouses.
- B.7 On the basis of the information obtained as part of the appraisal the site appears to be more sensitive to development than the two GMSF Allocation 22 sites north of Woodhouses. Although site B is seen from some places in the context of existing development to the north and has some existing development on it already, except the farmhouse

it is not residential, only ancillary buildings to the farm which fit to some degree with the fieldscape that surrounds the farm. Introducing residential development that is detached from the settlement may be incongruous with the character of landscape immediately south of Woodhouses.

Visual

- B.8 The following section provides a brief commentary on the potential visual issues associated with developing the site for housing. Several photographs have been taken to demonstrate the nature of views from potential receptors around the site and are illustrated on the following page.
- B.9 Views from the north along the settlement edge of Woodhouses are relatively open as shown on Photograph D, taken on Pike Avenue. Views are also available from Hartshead Crescent where residential properties are orientated to the south.
- B.10 Photograph E illustrates the view from footpath 47 north-east of the site. It captures the site along with the Medlock River valley beyond. Photograph F is taken from the east and it shows the site in the context of the settlement of Woodhouses.
- B.11 There are no public footpaths within close proximity of the site to the west, the closest is footpath 50 that runs south east across the golf course. A block of woodland immediately east of the footpath is likely to screen or heavily filter views of the site.
- B.12 Photograph G is taken from the southern side of the Medlock valley in Little Moss from Lumb Lane. Rooftops of existing dwellings in Woodhouses can be glimpsed through existing vegetation on the valley sides of the Medlock. Further north, beyond this viewpoint is the Oldham Way recreation

APPENDIX B - APPRAISAL OF OTHER ALLOCATED SITES IN WOODHOUSES



APPENDIX B - APPRAISAL OF OTHER ALLOCATED SITES IN WOODHOUSES



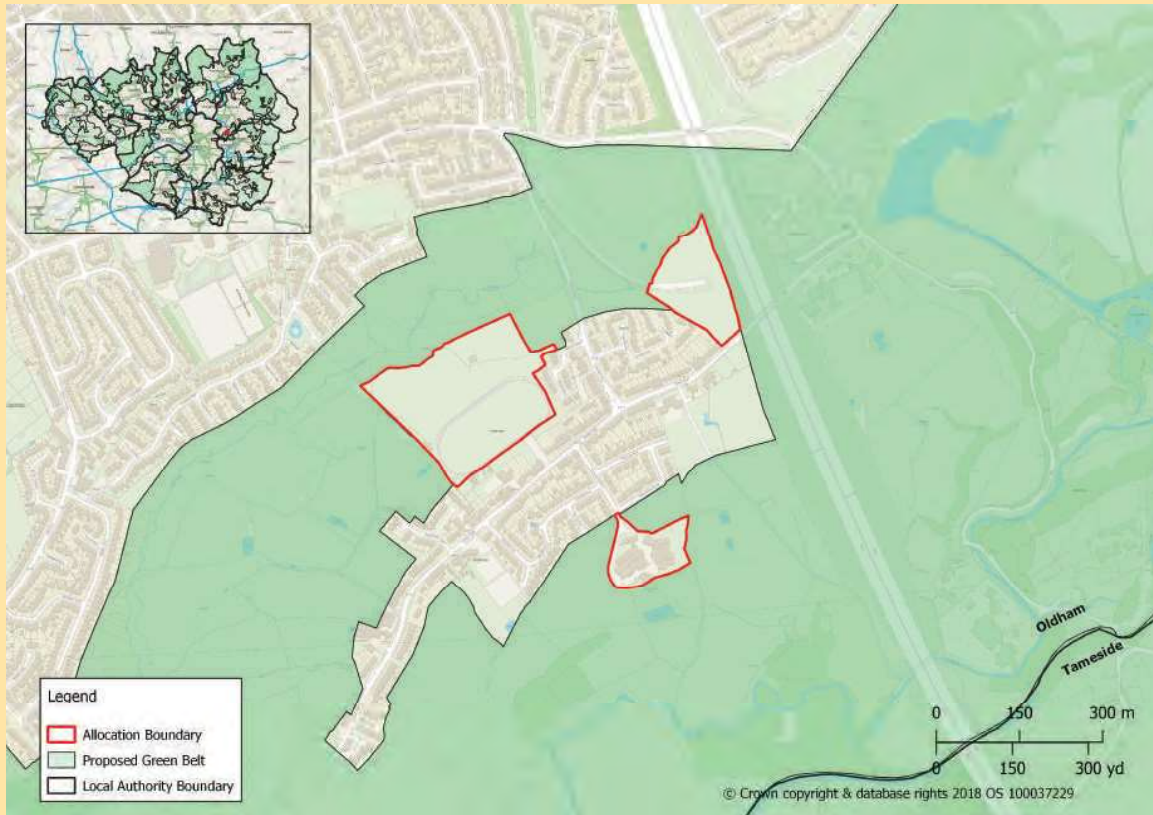
trail and several footpaths leading north towards Woodhouses. These were not accessed as part of this appraisal but it is likely that there may be views from some locations towards site B.

Summary

- B.13 In summary based on the appraisal of the site and its surroundings, development on this site at a typical density of 35 dwellings per hectare may have a negative impact on the character of the landscape to the south of the site and on receptors within the vicinity.
- B.14 A full landscape and visual impact assessment would be required as part of an iterative design process to ascertain the most appropriate approach to developing the site. It may be that if the site were to be developed that a much lower density of development could be applied and a layout taking the arrangement of a typical farm perhaps in a courtyard arrangement using suitable materials.

Policy GM Allocation 22

Woodhouses



Development at these sites will be required to:

1. Deliver around 260 homes, providing a range of dwelling types and sizes so as to deliver inclusive neighbourhoods and meet local needs, including a mix of high quality family housing;
2. Make provision for affordable homes in line with local planning policy requirements;
3. Provide for appropriate access points to and from the sites in liaison with the local highways authority and take account of and deliver any other improvements that may be needed so as to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site;
4. Deliver multi-functional green infrastructure and high quality landscaping within the site and around the main development areas so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages

with the neighbouring communities and countryside. Regard should also be had to the conclusions of the Landscape Character Assessment for the Incised Urban Fringe Valleys – Medlock Valley Landscape Character Area;

5. Retain and enhance areas of biodiversity within the site (most notably the existing Brookdale Golf Course and Lord's Brook Flushes SBIs) and the areas of priority habitats and protected species, to deliver a clear and measurable net gain in biodiversity;
6. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network so as to encourage active travel and improve connections and access to adjoining communities and countryside;
7. Provide for new and/or improvement of existing open space, sport and recreation facilities, commensurate with the demand generated, in line with local planning policy requirements;
8. Provide for additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;
9. Provide for appropriate health and community facilities to meet the increased demand that will be placed on existing provision;
10. Identify any designated and non-designated heritage assets and assess the potential impact on the asset and its setting, when bringing forward the proposals;
11. Identify any assets of archaeological interest, assess the potential impact on the asset and include appropriate mitigation strategies, which may include controlled investigation; and
12. Be informed by an appropriate flood risk assessment and comprehensive drainage strategy for each site and deliver any appropriate recommendations and measures (including mitigation measures and the incorporation of sustainable drainage systems) so as to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network.

11.150 The sites are currently designated as Green Belt in the Oldham Local Plan.

11.151 Whilst the sites do have ecological value that would need to be mitigated and integrated into the development as part of a complementary multi-functional green infrastructure, they are relatively free from topographical constraints and are considered developable.

11.152 The sites have the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area, adding to the type and range of housing available. The location of the sites, in a strong housing market, provide the potential to provide a range of high quality housing in an attractive and accessible location.

- 11.153** Woodhouses Conservation Area is close to the three sites and, whilst outside their boundary, any development would need to consider the impact on its setting through the completion of a Heritage Impact Assessment.
- 11.154** A flood risk assessment will be required to inform any development and a comprehensive drainage strategy for the site as a whole should be prepared as part of the more detailed masterplanning stage, in line with the Greater Manchester Strategic Flood Risk Assessment (SFRA) SUDs guidance, to ensure that undue pressure and burden is not placed on existing utilities infrastructure through piecemeal and uncoordinated development. Proposals should apply greenfield run off rates and be supported by a maintenance plan.

Question 97

Do you agree with the proposed policy GM Allocation 22: Woodhouses?

Agree / Mostly agree / Neither agree or disagree / Mostly disagree / Disagree

What is the reason for your answer?

Strategic Allocations in Rochdale

From: Simon Tucker [REDACTED]
Sent: 16 March 2026 09:33
To: spi.consultations@oldham.gov.uk
Subject: RE: Oldham Local Plan: Publication Plan – extension to consultation period
Attachments: Response CRTR-POL-2026-46162.docx; Response CRTR-POL-2026-46162.pdf

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Thank you for your consultation on the Oldham Local Plan: Publication Plan.

Please find comments attached from the Canal & River Trust in relation to the document.

Kind Regards

Simon Tucker MSc MRTPI
Area Planner North East, Canal and River Trust

T [REDACTED]
E [REDACTED]

Canal & River Trust
1st Floor, 21 The Calls, Leeds, LS2 7EH

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Please visit our website to find out more about the Canal & River Trust and download our 'Shaping our Future' document on the About Us page.



From: SPI Consultations <SPI.Consultations@oldham.gov.uk>
Sent: 10 February 2026 17:03
Subject: RE: Oldham Local Plan: Publication Plan – extension to consultation period

Dear Recipient

We recently wrote to you about the consultation on the Oldham Local Plan: Publication Plan which commenced on the 4 February 2026.

I am now writing to let you know that the **consultation period has been extended to the 27 March 2026**. Details of the consultation and how to respond have been included again below for your information.

What is the Oldham Local Plan?

Oldham Council is preparing a new Local Plan to replace the existing Joint Core Strategy and Development Management Development Plan Document adopted November 2011 and any saved planning policies from the Unitary Development Plan (UDP) 2006.

Following consultation on the Draft Local Plan in 2024, Oldham Council has prepared the Oldham Local Plan: Publication Plan on which representations are now invited.

The Oldham Local Plan will guide development in the Borough up to 2039. The main purposes of the Plan are to:

- set out the non-strategic policies through which the Council will manage development coming forward and use to determine planning applications;
- identify designations, such as those for the protection of the Borough's environmental and historical assets, our town centres, and employment areas; and
- facilitate the development of supporting infrastructure, such as transport, education and utilities.

The Local Plan will cover the whole Borough except the part that falls within the Peak District National Park.

Once adopted, the Oldham Local Plan will form part of the statutory Development Plan. It will be used to assess all planning applications across the Borough, alongside Places for Everyone Joint Development Plan Document.

The Oldham Local Plan: Publication Plan is supported by a suite of documents, including:

- Integrated Assessment (including the Habitat Regulations Assessment, Equalities Impact Assessment and Health Impact Assessment);
- Integrated Assessment Scoping Report Update 3; and
- a non-technical summary of the Integrated Assessment.

Thematic topic papers providing information on how policies have been shaped and supporting evidence are also available on the council's website.

Statement of Representation Procedure

Details of the consultation and information on the procedure for submitting representations on the Oldham Local Plan: Publication Plan are set out within the attached Statement of Representation

Procedure. This includes what information should be provided as part of a representation and details of the next stage - the independent examination of the Plan.

Where to view the Oldham Local Plan: Publication Plan

The Oldham Local Plan: Publication Plan and supporting documents can be viewed on the Council's consultation portal at <https://bigoldhamconvo.oldham.gov.uk/> and on the Council's website at https://www.oldham.gov.uk/info/201233/local_plan_review.

Hard copies of the Oldham Local Plan: Publication Plan and supporting documents can also be found at:

- the Borough's libraries (for the latest details on library opening times please visit <https://hla.oldham.gov.uk/libraries/local-libraries/>); and the
- Oldham Council Customer Service Centre, Spindles Shopping Centre, Oldham, OL1 1HD

Appointments

If you would like to discuss Oldham Local Plan: Publication Plan or ask any questions before making your representation, you can book a telephone appointment with a planning officer, or in-person at the Council's Spindles Shopping Centre offices. To book an appointment please email spi.consultations@oldham.gov.uk or call 0161 770 4105.

How to comment

Representations on the Oldham Local Plan: Publication Plan are invited between **Wednesday 4 February 2026 to 11.59pm Friday 27 March 2026**. This includes the extended consultation period.

The Council is keen to promote the submission of comments electronically and encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted using the online representation form via the Council's consultation platform at <https://bigoldhamconvo.oldham.gov.uk/>.

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- emailed to spi.consultations@oldham.gov.uk; or
- posted to: Strategic Planning and Information, Oldham Council, First Floor Reception, Spindles Shopping Centre, Oldham, OL1 1LA

How your comments will be held

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

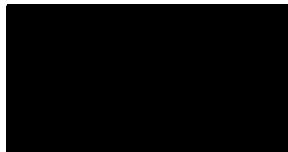
Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the Council's website at https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

Local Plan Mailing List

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. If you wish to be removed from the mailing list please visit https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation or contact us via the details below.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at spi.consultations@oldham.gov.uk.

Yours sincerely



Peter Richards
Assistant Director of Planning, Housing and Transport

From: SPI Consultations <SPI.Consultations@oldham.gov.uk>
Sent: 04 February 2026 21:26
Subject: Oldham Local Plan: Publication Plan

Dear Recipient

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Alternatively, the representation form can be downloaded from https://www.oldham.gov.uk/info/201233/local_plan_review and may be:

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How your comments will be held

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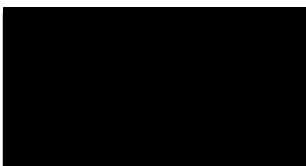
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Yours sincerely



Peter Richards

Assistant Director of Planning, Housing and Transport



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Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.

Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

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Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.



**Canal &
River Trust**

Making life better by water

Our Ref



Monday 16 March 2026

Oldham Local Plan: Publication Plan

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The Trust provided comments on the Draft Local Plan on 15th February 2024.

As highlighted in our previous response, the Trust believe that access to our waterways can provide multiple economic, social and environmental benefits to local communities.

The Trust broadly encourages policies which seek to:

- Protect the heritage, environmental and recreational value of canals, rivers and other waterscapes and to safeguard them against inappropriate development;
- support the ability of waterways to deliver economic, social and environmental benefits to local communities and the nation as a whole; and
- secure the long-term sustainability of the inland waterway network, their corridors and adjoining communities.

The Trust own and manage the Rochdale Canal and the Huddersfield Narrow Canal, which both run through the district. Both canals are subject to ecological designations, including the presence of SSSI and SAC designations.

We wish to make the following comments on the Publication Plan Document:

5. Spatial Portrait

Transport

Paragraphs 5.27 to 5.29 discuss the presence of existing transport infrastructure within the borough. We believe that the document could be more effective if a paragraph was included that discussed the presence of active travel networks for walking and cycling in the borough. This is a transport mode that is not discussed, which we believe should be made more apparent to decision makers within the adopted document (to protect and encourage use of active travel means). We request that the route of active travel networks, including canal

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk W: canalrivertrust.org.uk T: 0303 040 4040

towpaths, should be referred to in this section. This would also tie in with the aims of paragraph 6.5, that seeks to promote sustainable travel, by helping to make decision makers more aware of the presence of existing networks that can be used to realise its core aims.

Key Diagram (Page 27)

The reference to our canals on the Key Plan on page 27 would help to ensure that our network is identified by both decision makers and prospective developers, which could make the plan more effective in maximising the benefits of canalside development.

9. Economy and Employment

Policy E5 – Reuse and redevelopment of Mill Buildings

Several mill buildings within the district were built in conjunction with proximity to our waterway network, and several contribute towards the wider heritage value and setting of our canals. The general aim of Policy E5, which would allow for more flexible uses for empty mill sites, could help to ensure the opportunities to re-use and preserve the historic fabric of these buildings can be made where possible, in line with the principles of paragraph 212 of the National Planning Policy Framework (NPPF).

In our response to the Draft Local Plan, we did raise concern that the requirements for applicants to undertake viability exercises could present a challenge for applicants preserving mill assets to be approved as it was not clear on the amount of evidence required for a viability exercise. The cross-reference to Policy HE4 in Publication Document, where explanatory paragraphs 15.40 and 15.42 provides more detail on the expectations of viability assessments would help to provide greater certainty to prospective developers.

12. Addressing Climate Change

The wider aims of this section of the document seeks to establish how Oldham will be an exemplar Green City on energy, carbon, water and green infrastructure' in line with the Oldham New Deal Green Strategy (paragraph 12.5). We wish to highlight that, to achieve this, all sources of low carbon and renewable energy sources should be realised where appropriate.

Due to the nature of the wider borough, with steep sided valleys and numerous water resources, we believe that this section of the document could be more effective if the descriptive text provided examples of the use of water resources for energy, to help signpost developers and decision makers to examples they may wish to consider that could be viable in the local area. Specifically, water source heat pumps and the use of micro hydroelectric generation could be feasible in the local area.

As an example of a low carbon energy source, water from our waterways may be used for heating and cooling new developments. The water flowing through our waterways contains enough thermal energy to produce approximately 640 MW of energy nationwide, and we believe can make a contribution towards the needs of Oldham. The Trust wish to highlight that water resources from our network are commonly used for active cooling and heating solutions in new developments, including the use of water source heat pumps, which can be more efficient than air source alternatives.

Whilst paragraph 12.10 highlights the potential for solar, hydrogen, heat pumps and district heating, no reference to the use of water resources is made. We would welcome expansion of this paragraph to reference the potential for water resource use as, without such signposting, there is a risk that certain feasible options for low carbon energy generation may not be considered during the assessment and decision phase; making the Local Plan less effective.

CC2 – Managing Flood Risk

Paragraph 12.34 refers to the need to assess for residual risk of flooding from our network. We believe this will help make the document more effective in ensuring that all sources of flood risk are appropriately assessed and mitigated against.

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk W: canalrivertrust.org.uk T: 0303 040 4040

Policy CC3 - Sustainable Drainage – Foul and Surface Water

As highlighted in our comments on the draft plan, the Trust can agree, in certain circumstances, to the introduction or reuse of surface water discharge points to our network. However, the Trust own and manage our waterways, and discharges to our network require our consent and are not guaranteed.

The addition in paragraph 12.41 of reference to the need for our consent for discharges to our watercourses would help make the document more effective in highlighting this to prospective developers and decision makers when determining how to design surface water drainage from site. This could also help speed up any future development process by helping to avoid instances where drainage plans need to be redesigned following consultation with the Trust.

13. Natural Environment and Open Land

Policy N3 - Enhancing Green Infrastructure through development

The policy text references the need to protect existing high quality and multifunctional corridors. The overall policy text could help ensure that important green and blue infrastructure assets are protected and enhanced in a manner to ensure that the public can access and benefit from these spaces.

We wish to highlight that, although the river corridor is referenced in part 3 of the policy, we request that reference to our canals and wider blue infrastructure is referred to in the policy, so as to ensure that these spaces are taken account of when the policy is brought into action.

There may be opportunities to help promote surveillance of green and blue spaces where appropriate, which could help make these spaces more visible to the public and more attractive for public use (through reducing the fear of crime). Expansion of the wider policy to consider this could therefore be considered.

15. Oldham's Historic Environment

The Trust have no significant issue with the content of this section of the document, which includes policies that have specific reference to the importance of the Rochdale and Huddersfield Narrow canals to Oldham's heritage, which could make the document effective in protecting heritage assets associated with our canals.

Due to their age and association with the historic development and industrialisation of Oldham district, we identify that our canals form non-designated heritage assets. The identification of this within Policy HE5 is therefore welcomed. The policy wording appears comprehensive, and would help to ensure that development will take account of the heritage value of our canals. This will make the Local Plan more effective in meeting the overarching aims of paragraphs 202 and 203 of the NPPF.

To ensure that the document can be made as effective as possible, we request that consideration is given to the following:

Terminology

We do question whether there needs to be more consistency in the terminology over the use of 'non-designated heritage assets'. The text does interchange between 'non-designated heritage assets' and 'non-designated assets' (e.g. para 15.3), which could result in some confusion. We request that these should all read 'non-designated heritage assets' for consistency.

Reference to 'Restoration'

Policy HE1 (Part 8) and HE5 refer to the 'restoration' of canals. There is a risk that this could be confused with canal restoration (which involves the restoration and bringing into use of abandoned canals). We do not believe this is the intention of the document. To avoid confusion, we request that reference to 'restoration' within these two

Canal & River Trust Spatial Planning Team

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policies is either made more explicit or removed. For example, HE1 (part 8) could be amended to read “Protect and enable **improved** appreciation of the canals”, whilst HE5 could be amended to read “To ensure **that the future conservation and enhancement of canals is enabled**, development alongside the line of the canal and towpath shall not prevent **the** conservation and enhancement of the waterway’s heritage and built environment. Green Infrastructure incorporating walking, wheeling and cycling routes and heritage interpretation features along its line should be provided.”

16 Achieving High Quality Design

We have no significant issue with this proposed section of the Publication Plan document, which we consider to be generally appropriate.

Policy D1 – Achieving High Quality Design

Whilst having no significant issue with the wording of this policy, to help avoid overly defensive boundary treatments in sensitive areas such as the canal corridor, we recommend that the wording in points 2 and 11 could be expanded to specifically refer to boundary treatments alongside sensitive spaces. This would help make the policy wording more precise and effective.

Additional suggested text (in bold) is provided below:

“2 encourage and facilitate active travel with convenient, safe and inclusive pedestrian and cycling routes and promote wayfinding for all travel modes; **ensure any interface with adjoining spaces is positive, well designed and sensitive to its context**”

“11 ensure that the design and layout minimises actual and perceived opportunities for crime, anti-social behaviour, disorder and terrorism; **through well considered natural surveillance appropriate to the site’s context**”

We believe the additional text would keep the general policy wording general enough to apply to different contexts, but would add more content to steer developers and decision makers towards more context appropriate design outcomes.

17. A Sustainable, Active, Accessible Network for Oldham

Policy T1 – Delivering Oldham’s Transport Priorities

Within the Draft Plan, we previously commented that there was an opportunity to refer to need to improve existing cycle/walking routes alongside new development. Part 5 of this policy references the need for development that “maintains and improves the Public Rights of Way network, including by increasing the networks accessibility”, which addresses this comment, and would make the Plan more effective.

19. Protecting Our Local Environment

Policy LE2 - Ground Conditions and Contaminated Land

As highlighted in our response to the Draft Plan consultation, our network is often supported by existing embankment structures or cuttings, which are often at risk of instability from neighbouring development.

Amendments compared to the draft Plan have been made to the policy text, and refer to the provision of a land stability or slope stability risk assessment to address sites on potentially unstable land.

This amendment is considered positive, as it would help address the risk of land instability appropriately, and would be consistent with the advice of the Planning Practice Guidance, where Paragraph 003 (Reference ID:45-003-20190722) confirms the role of planning in planning for land instability, and that authorities may need to consider circumstances where additional procedures or information, such as a land stability or slope stability risk

Canal & River Trust Spatial Planning Team

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assessment report, would be required to ensure that adequate and environmentally acceptable mitigation measures are in place.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Simon Tucker MRTPI
Area Planner



<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

From: Martyn Walker [REDACTED]
Sent: 11 March 2026 12:19
To: SPI Consultations
Subject: Lancashire Wildlife Trust response to the publication phase of the local plan
Attachments: Lancashire Wildlife Trust response to the publication local plan.pdf

Dear planning team

Please find attached the Lancashire Wildlife Trust's response to the publication phase of the local plan consultation. If you have any queries or require clarification please do not hesitate to contact me.

Kind Regards

Martyn

Martyn Walker
Senior Conservation Officer for Lancashire Wildlife Trust
[REDACTED]
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The Wildlife Trust for Lancashire Manchester & North Merseyside



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11th March 2026

FAO Planning Team

Dear Planning Team

RE: LANCASHIRE WILDLIFE TRUST COMMENTS ON THE OLDHAM LOCAL PLAN: PUBLICATION PLAN

Thank you for consulting the Lancashire Wildlife Trust on the above publication. The Trust believes the plan to be legally compliant, sound and complies with the Duty to Co-operate. We do however have suggestions and recommendations to make that are difficult to fit within the representation forms provided and feel that a written representation, outlined below, is a more effective way of providing our comments.

The Trust welcomes and supports Oldham's commitment to protecting and enhancing the borough's biodiversity resource and the recognition of both the climate and biodiversity emergencies that we currently face. We welcome that the policies recognise the importance of not just simply protecting our remaining biodiversity resource but also commits to enhancing and increasing both habitat and species diversity. We feel that many of the policies contained within the plan are exemplar policies of how planning development can help not only to protect biodiversity but help lead to its recovery.

Our more specific comments regarding the publication plan are detailed below.

Chapter 3: Building a Better Oldham

Paragraph 3.12 Oldham's Green New Deal: The Trust supports the approach set out in the strategy, especially the recognition that the protection, creation and enhancement of green infrastructure can provide multi-functional benefits that help to underpin our response to climate change and carbon reduction whilst providing connected and resilient networks.

Chapter 5: Spatial Portal

The Natural Environment

Paragraph 5.18: The Trust agrees and welcomes that the importance of the peat soils and that action to stabilise, restore and rewet deep peat soils is required to enable it to store carbon and support notable habitats.

Paragraph 5.21: We welcome that the plan recognises the important part green infrastructure plays in underpinning people's quality of life and supporting biodiversity.

Chapter 6: Vision for Building a Better Oldham

Paragraph 6: The Trust agrees with and supports the vision of responding to both the Biodiversity and Climate Change emergencies through the protection, restoration and enhancement of the natural environment. We welcome and support Oldham in seeking to be a carbon neutral exemplar with a resilient and multifunctional Green Infrastructure network which brings multiple benefits to the natural and built environment as well as to the health of its residents and visitors.

Chapter 7 Plan Objectives

PO5 Protecting and enhancing Oldham's landscape: The Trust welcomes and supports this policy

PO6 Protecting, restoring and enhancing the natural environment: The Trust welcomes and supports this policy

PO7 Promoting sustainable development that mitigates and adapts to climate change: The Trust welcomes and supports this policy

Chapter 11 Oldham Town Centre

Policy OTC4 - Green Infrastructure within and around Oldham Town Centre: The Trust welcomes and supports this policy, we are especially pleased that the protection, creation and enhancement of multi-functional Green Infrastructure within and around Oldham Town Centre will be expected and that this will help to contribute to the function of greenspaces as stepping stones by wildlife to promote nature recovery. We welcome that development will need to have regard to the nature network within the Local Nature Recovery Strategy and incorporate biodiversity enhancements such as green walls and roofs, trees, and landscaping to encourage wildlife. We agree with and welcome that nature-based solutions and sustainable drainage systems will be integrated I not development as part of the multi-functional green infrastructure provision.

Chapter 12 Addressing Climate Change

Paragraphs 12.4/12.5: The Trust welcomes the boroughs aim to become the greenest brough and its ambition to be the UK's first Green New Deal Council. We support and welcome Oldham's objective of establishing the borough as an exemplar Green City.

Paragraph 12.6: The Trust agrees with and fully supports the council in seeing nature as playing an important role in providing key services for climate change adaption and support its commitment to restoring natural processes and utilising nature-based solutions to help communities become more resilient to climate change, whilst enhancing nature and biodiversity.

Policy CC1 - Renewable and Low Carbon Energy: The Trust welcomes that before being supported development would need to appropriately assess biodiversity issues and the presence of peat soils. We agree with and welcome the recognition that peat plays an important role in nature-based solutions such as carbon storage and biodiversity support. We agree that it is important to protect peat where the condition allows it to perform important functions, including supporting notable habitats. However, the Trust does feel that there should be a presumption against development on deep restorable peat that either reduces the area of peat, the condition of the peat or impacts its ability to be rewetted and restored.

Flood Risk and Water Quality

Policy CC2 - Managing Flood Risk: The Trust welcomes and supports this policy

Policy CC3 - Sustainable Drainage – Foul and Surface Water: The Trust welcomes and supports this policy

Policy CC5 - Groundwater Source Protection Zones: The Trust welcomes and supports this policy

Chapter 13: Natural Environment and Open Land

Policy OL1 - Consideration for the Peak District National Park: The Trust welcomes and supports this policy

Policy OL2 - Oldham's Green Belt: The Trust welcomes and supports this policy

Policy OL4 - Local Green Spaces: The Trust welcomes and supports this policy. We note the suggestion within paragraph that 13.23 that within time local green space might be used as habitat banks. However, we do see a potential problem with this approach. Given that the biodiversity uplift of a site is calculated from its baseline condition, any works to enhance biodiversity interest in the interim would reduce the percentage uplift into the future. This can lead to sites biodiversity interest lying dormant until sites come online and will be dependent on the state of the BNG market into the future.

Policy OL5 - Protecting Dark Skies and Tranquillity: The Trust welcomes and supports this policy. We particularly welcome the requirement that development would be expected to demonstrate that there is no significant harm impacting on sites of nature conservation value. However we would also recommend referring to species and not just sites.

Chapter 14 Addressing the Biodiversity Emergency

The Trust agrees with and welcomes the recognition of the multiple benefits biodiversity plays in our lives. We welcome that it is also recognised that biodiversity has a value in its own right and that the preservation and enhancement of complex and stable eco-systems is a vital function of development planning.

Policy N1 - Protecting Nature: The Trust fully supports this policy and feel that it is substantive and comprehensive biodiversity policy.

Policy N2 - Restoring Nature: The Trust fully supports this policy and feel that it is substantive and comprehensive biodiversity policy.

Policy N3 - Enhancing Green Infrastructure through development: The Trust is fully supportive of this policy. We particularly welcome that development proposals would be expected to protect the ecological network and where possible extend or enhance the network. We welcome that development should have regard to Oldham Green Infrastructure Strategy and the 7 stated priority

themes. We welcome that the Urban Greening Factor requirements should be considered at the earliest possible stage of design development alongside mandatory BNG requirements to ensure these requirements are considered from the outset of design. We would suggest that the urban greening factor might be a policy in its own right. We welcome and agree that development can contribute to creating high-quality river corridor by taking opportunity to create a continuous and enlarged open space adjacent to rivers. This will also help to create a bigger, better and more joined up nature network.

Policy N4 – Trees: The Trust agrees with and fully supports this policy. We welcome that scale and nature of tree planting should consider strategies such as green infrastructure strategy and the GM LNRS. We particularly welcome the reference to restorable peat soils taking precedence.

Monitoring

Whilst we agree with the monitoring indicators as set out we feel that some form of species monitoring would be beneficial. Perhaps this could be monitored in terms of area of habitat set aside for specific target species as part of site master plans or the provision of off-site compensation for the GM LNRS target species.

Chapter 15 Oldham's Historic Environment

Policy HE5 – Canals: The Trust supports this policy and welcomes that green infrastructure should be provided to enhance these recreational routes.

Chapter 16 Achieving High Quality Design

Policy D1 – Achieving High Quality Design: The Trust welcomes and supports the policy, especially policy point 9 that development should incorporate appropriate landscaping and urban greening, such as green roofs, green walls, trees and shrubs and support nature through the incorporation of wildlife-friendly features (such as nest boxes) and that this provision should be integrated with the nature recovery network.

Policy D3 – Creating a Better Public Realm in Oldham: The Trust welcomes that the policy includes the requirements set out within policy points 5 and 7 in line with policy OI5 and N3 respectively.

Chapter 18 Communities

Open Space, Sport and Recreation

Policy CO2 – New and Improved Open Space, Sport and Recreation Provision: The Trust supports and welcomes policy point 4 that the new open space should be well connected to the existing GI network and have regard to the council's GI strategy. The type of habitats created within new open space should also have regard to the GM LNRS where appropriate

Chapter 19 Protecting Our Local Environment

Policy LE3 – Air Quality: The Trust supports this policy

Chapter 21 Monitoring

Policy M1 – Monitoring Framework: We feel that the monitoring of S106 agreements, conservation covenants and conditions attached to BNG deliver will be essential in assessing the effectiveness of the local plan. Resources must be made available to ensure that there are effective policing and enforcement of the agreements/conditions where required. It is worth noting that the 'lost nature' report, commissioned by wild justice indicated that nationally, only half (53%) of the ecological features that are legally binding conditions of planning permissions are actually in place on the ground. Clearly, this discrepancy between conditioned action and on the ground- delivery will need to be tackled for nature's recovery to be achieved. Monitoring and enforcement of planning conditions will play a vital part in ensuring the success of the plan.

I hope that the above information and comments prove useful. If you require further information or clarification, please do not hesitate to contact me.

Regards

MC Walker (signed electronically)

Martyn Walker
Conservation officer for Greater Manchester

[Redacted signature]