

Oldham

Local Plan

**Local Plan Review: Draft Local Plan Integrated
Assessment Appendix 19: Health Impact
Assessment**

December 2023



Oldham
Council

Health Impact Assessment for the Draft Local Plan

November 2023

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1. Introduction

- 1.1 This Health Impact Assessment (HIA) assesses the potential health and wellbeing impacts of the new Local Plan. Guided by the London Healthy Urban Design Unit (HUDU) Rapid Health Impact Assessment tool and the Healthy Urban Planning Checklist. The spatial planning team has carried out this HIA.

2. What is the purpose of Health Impact Assessments (HIA)?

- 2.1 The World Health Organization (WHO) defines an HIA as a combination of processes and methods used by those planning, deciding, and shaping changes to the environment to evaluate the significance of health effects of a plan or project. An HIA helps decision-makers in local authorities and other stakeholders make choices and actions to best, prevent ill health, promote good health and reduce health inequalities. When applied in the planning system, an HIA puts people's health and wellbeing at the heart of the process.
- 2.2 The National Planning Policy Framework (NPPF) sets out the government's planning policies and, how they, should be, applied. It requires planning policies and decisions to "*enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs*". It also emphasises that the level of detailed supporting information provided to local authorities should be relevant, necessary and material, and that having the right information is crucial to good decision-making. The supporting national Planning Policy Guidance (PPG), healthy and safe communities' chapter, suggests the use of HIA can be beneficial "where there are expected to be significant impacts"

3. Health and wellbeing

What is a healthy person?

- 3.1 A healthy person has been defined by the Health Foundation as 'not as someone free from disease but as someone with the opportunity for meaningful work, secure housing, stable relationships, high self-esteem and healthy habits.' This highlights the importance of factors in our environment and the impact they have on our wellbeing and health, rather than focusing on a bio-medical model of health. Therefore, planning has a significant role to play in improving the public's health and wellbeing.

What is a healthy community?

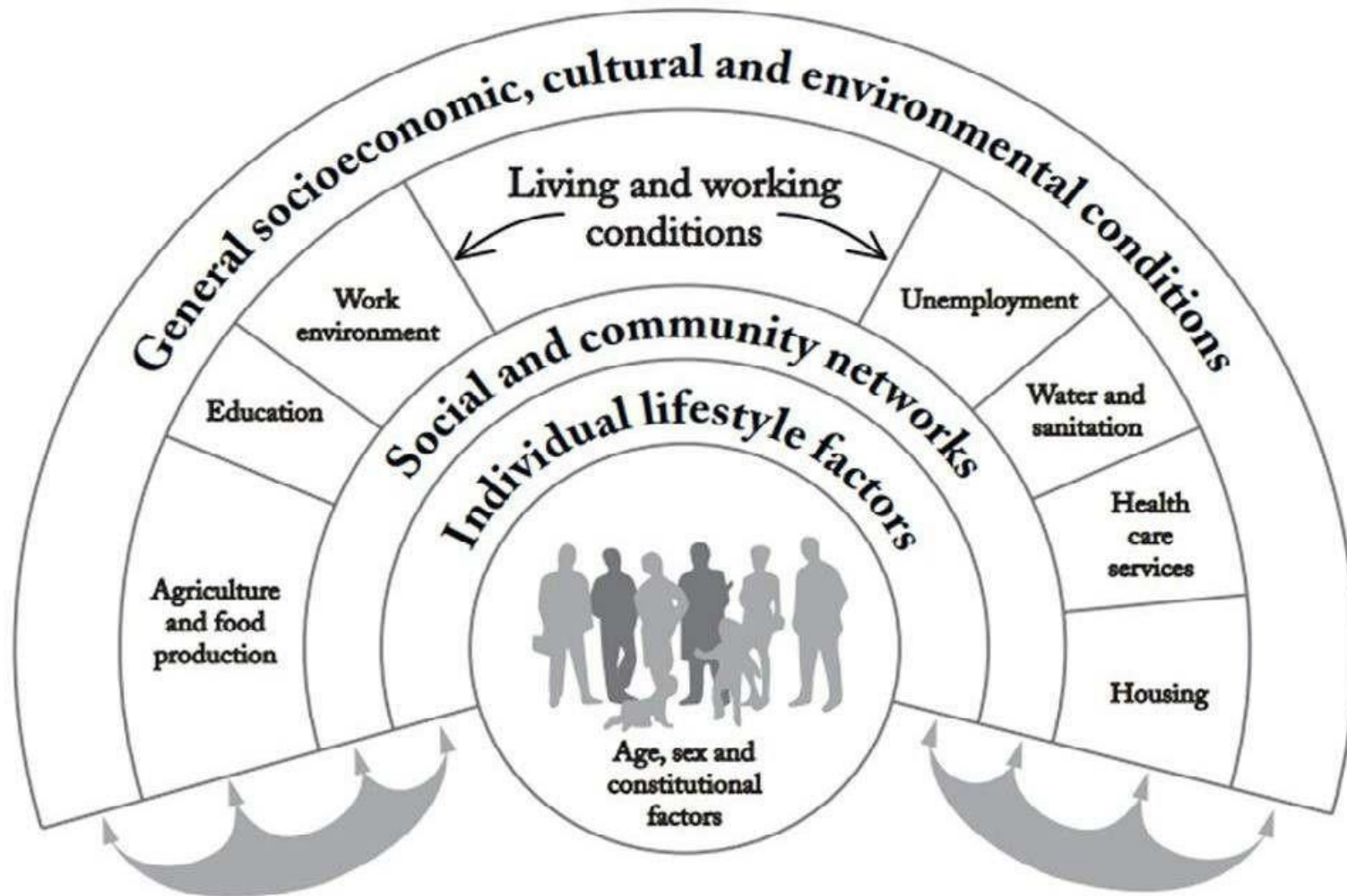
3.2 A healthy community is a good place to grow up and grow old in. It is one, which promotes healthy behaviours and supports reductions in health inequalities. It should enhance, improve and support physical and mental health of the community. A healthy community should also support the following:

- Active healthy lifestyles - made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing; and is accessible by walking, cycling and public transport.
- The creation of healthy living environments for people of all ages – they support social interaction, from children and young people by way of play and exploring for example through accessible and safe blue and green infrastructure.
- Making our town centres adaptable and accessible by way of layout and design for our elderly population and the increase of people living with dementia and other sensory or mobility impairment

What are the wider determinants of health?

3.3 The health and wellbeing of people and communities is influenced by, a wide range of factors, the majority of which lie outside of the health service. These are the wider determinants of health.

Figure 1: Determinants of health and wellbeing in our neighbourhoods (Barton and Grant based on Dahlgren and Whitehead)



3.4 Since the publication of the Issues and Options consultation, Oldham has seen massive challenges to population health that are unprecedented in recent decades and have brought inequalities into sharp focus. The Coronavirus pandemic (COVID-

19) has likely worsened the pre-existing health inequalities in Oldham, both through its direct impact on illness and death, but also through its indirect impact on the wider determinants of health.

- 3.5 COVID-19 will have significant medium and long-term health, social and economic impacts on our communities, with some population groups affected disproportionately. Emerging concerns for health include the impact on people living with chronic and long-term health conditions (e.g. diabetes, obesity and respiratory conditions) who may be at increased risk of complications from COVID-19 and increased risk of death. It may also worsen social isolation, loneliness, and mental illness. An economic downturn because of COVID-19 will have long-term impacts on health and wellbeing.
- 3.6 It is widely recognised that there is an important link between how places are, planned and developed can, have an impact on health (including mental health) and wellbeing. This link is, recognised in the planning system. In developing the Local Plan, the council has taken account of social, economic and environmental issues in Oldham. However, the links between environment, health and health inequalities cannot always be fully addressed by the planning system. Nevertheless, this does not mean the planning system does not have a role to play.
- 3.7 Housing is a significant social determinant of health and poor-quality housing can increase inequalities and subsequent consequences for health and wellbeing. Increased time spent at home and a lack of access to outdoor space (particularly for those in the private rented sector), may worsen health impacts. There is an increased risk of people becoming homeless or falling into debt due to an inability to pay rent. The pandemic has highlighted the importance of suitable housing and the need to consider availability and provision of social rented and intermediate housing.
- 3.8 Changes in how residents use and access green spaces and interact with the public realm during the pandemic. The way we move around has changed due to the need to social distance has meant a shift to more active and sustainable travel modes. There may also be longer-term implications in the design of 'healthy places and neighbourhoods,' including the need to consider spatial inequalities, the use of indoor and outdoor space and town centre design. The impact of Covid on the environment and climate change, especially in terms of energy consumption and air quality pollution, is unknown but is likely to fluctuate.

4. Oldham's new Local Plan

- 4.1 The aim of the new Local Plan is to plan how the borough will develop, look and grow. It will help the council to deliver wider improvements for the borough for years to come. In developing the new Local Plan, the council has engaged with the Oldham residents, stakeholders and partners including health providers (for example National Health Service), environmental bodies/groups, sporting governing bodies and businesses. At the centre of the Local Plan is addressing climate change, improving health and wellbeing and reducing growing inequalities, this aligns with the policies and objectives of Places for Everyone (PfE). Additionally, it looks to deliver wider improvements for the borough including delivering much needed genuine affordable homes, creating job and training opportunities, building resilience and strengthening growth of our town centres and areas of deprivation, protect, enhancing and improve access to our green and blue infrastructure.
- 4.2 The Draft Local Plan has been informed and influence by several health plans/strategies, for example a key document that has influence the Local Plan is the Oldham Plan. It sets out the long-term ambitions for the borough and the overall direction and priorities that the partnership will focus on. It sets out the key priorities that the members of the Oldham Partnership want to work on together. The overarching priority is to increase community participation in Oldham as a driver to improving resilience and wellbeing, focussing on those parts of the borough with the poorest outcomes. It highlights how adopting a collective approach can help to better, achieve the ambitions of the people who live and work in the borough.
- 4.3 In addition, it sets out actions for how partners can work collectively with our communities to deliver the priorities. This includes identifying and highlighting the assets in our communities, both physical spaces, as well as people and groups with skills and knowledge that can help strengthen and grow community-led activities.

5. The Local Plan and HIA's

- 5.1 The Local Plan recognises the value of HIAs and the role they can play in shaping development proposals by promoting sustainable developments that support the creation of strong, vibrant and healthy communities. The Local Plan states that HIAs are designed *'to be an objective assessment tool for addressing the barriers and enablers for creating healthy places.'* Furthermore, it says that HIAs should be *'carried out during the implementation stage to avoid the risk of retrofitting health sensitive solutions a proposal, which is likely to generate higher development costs and affect the financial viability of the development'*.
- 5.2 Policy CO7 sets out the council's criteria for when a HIA must be, submitted with the planning application.

Residential development of 100 dwellings and above and all developments requiring an Equalities Impact Assessment (EIA) must be supported by a Health Impact Assessment (HIA) to demonstrate that full consideration has been given to health and wellbeing impacts of a proposal. Proposals which are deemed to achieve negative health impacts overall will be refused.

A HIA may be required for other developments where significant health implications are identified. The council will make a decision on a case-by-case basis.

As part of preparing the HIA, developers are required to consider wider regional/local health and wellbeing strategies, as appropriate, and set out how the proposed development will contribute to the aims and objectives of those strategies, where relevant.

6. The Local Plan objectives and spatial vision

6.1 The Local Plan Vision for Oldham up to 2039 will be achieved by:

PO1 Building quality homes to meet local needs and diversify the housing offer by:

- providing for, and supporting the delivery of, 11,560 new homes;
- delivering a diverse housing offer to meet the needs of all our residents including affordable housing and homes for families, older people and disabled people;
- ensuring the delivery of high-quality, sustainable and well-designed new homes; and
- ensuring appropriate densities and making the best and most effective use of brownfield land.

PO2 Providing opportunities to learn and gain new skills by:

- supporting the provision of suitable, modern services and facilities for the education and training of all age groups, including addressing the needs for primary and secondary school places; and
- encouraging employment and skills opportunities for local people as part of new developments.

PO3 Boosting northern competitiveness by providing access to employment opportunities and growing local businesses by:

- providing for, and supporting the delivery of, around 12 hectares of office floorspace and around 41 hectares of industrial and warehousing floorspace;
- protecting designated sites that are suitable and attractive for existing and new businesses to locate to and expand on;
- encouraging and facilitating the development of the borough's key economic sectors with a focus on clean growth and green innovation;
- supporting the expansion of digital infrastructure to assist economic growth; and
- supporting a range of sustainable leisure and tourism activities.

PO4 Supporting the regeneration of Oldham Town Centre and creating thriving centres by:

- supporting the delivery of the Oldham Town Centre strategic framework and appropriate plans or projects that facilitate the regeneration of the borough's other centres; and
- promoting and enhancing the vitality and viability of the borough's centres to ensure their long-term sustainability.

PO5 Protecting and enhancing Oldham's landscapes by:

- respecting the Peak District National Park and its purposes;
- promoting the positive use of the Green Belt;
- identifying Local Green Spaces that are special to local communities and supporting their enhancement; and
- ensuring high quality new development makes a positive contribution to Oldham's landscape and townscape features and characteristics.

PO6 Protecting, restoring and enhancing the natural environment by:

- achieving net gain in Oldham's biodiversity and supporting opportunities to implement a nature recovery network;
- using nature-based solutions to mitigate against, and be resilient to, climate change; and
- implementing Oldham's Green Infrastructure Strategy and supporting projects such as Northern Roots.

PO7 Promoting sustainable development that mitigates and adapts to climate change by:

- achieving high standards of sustainable design and construction;
- adopting a positive approach towards energy schemes and the identification of low carbon and renewable energy opportunities;
- reducing the risk of flooding to people and property taking into account climate change;
- managing flood risk through the use of integrated water management and the provision of multi-functional green infrastructure; and
- promoting the efficient use of water resources and water quality.

PO8 Uplifting the health and well-being of our residents and local communities by:

- facilitating and encouraging local and accessible health and well-being provision;
- protecting and enhancing access to open space, sport and recreation facilities, including the provision of new and / or improved open spaces, to meet the needs of new development;
- providing spaces to grow food in new and existing communities, such as allotments and community gardens;

- supporting and protecting new and existing community facilities;
- reducing crime and fear of crime and promoting community safety, through good design of the built environment;
- improving air quality for the benefit of everyone; and
- providing and maintaining high standards of amenity and local environmental quality.

PO9 Improving and valuing a better built environment, by:

- delivering high-quality design and placing greater emphasis on place-making, with building and spaces that respond positively to local distinctiveness and character;
- conserving and enhancing the borough's historic environment and heritage assets; and
- ensuring that proposals within Oldham Town Centre follows the recommendations set out in the Oldham Town Centre Conservation Area Management Plan with the aim of removing the Conservation Area from the at risk register.

PO10 Promoting accessible and sustainable transport choices, by:

- supporting delivery of Oldham's Transport Strategy and the Right Mix approach so as to encourage walking, cycling and an increase in active travel;
- reducing the need to travel through ensuring new development is located in areas with access to local services and facilities; and
- improving connectivity for Oldham's residents to key areas of employment within the borough, the city region and beyond.

The vision for Oldham is that by 2039.....

Oldham will have a clean, green and healthy environment. We will have responded to both the Biodiversity Duty and the Climate Change emergency through the protection, restoration and enhancement of the natural environment and having a substantially reduced carbon footprint from meeting the council's ambition to achieve carbon neutrality by 2030. Oldham will 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.

Through delivering around 11,560 new homes of different sizes and types, including affordable housing, Oldham will have quality homes for everyone that meet the needs of Oldham's diverse communities. New homes, delivered in sustainable and accessible locations, will contribute to inclusive communities where everyone can live.

Oldham will be a key contributor to Greater Manchester's economy, with a strong reputation for clean growth and green innovation. It will be a place of dynamic businesses with better job opportunities, where those businesses local to Oldham are supported to thrive and grow, and those new to Oldham are attracted to invest. Every resident will be enabled to contribute to, and benefit from, economic growth of the city region providing significant progress in living standards, wages and skills for everyone in Oldham.

Oldham will have accessible and sustainable transport choices, providing improved connectivity across the borough, the city-region and beyond - for all. We will have a transport system that enables the local economy to prosper and our residents to fully contribute to and benefit from job opportunities, and a comprehensive network of on and off-road walking and cycling routes that encourage active travel, making it easier and safer for people to get to key local destinations.

Oldham Town Centre will be a place that thrives by combining a retail core with quality homes, opportunities to learn, develop new skills and gain employment, and a diverse culture, leisure and night-time offer that supports its local communities and attracts visitors. Our Town Centre will be supported by the borough's other centres – Chadderton, Failsworth, Hill Stores, Lees, Shaw, Royton and Uppermill which will continue to provide a vital role in meeting the needs of the borough's communities, connecting our residents to local services and facilities in a way that fosters a sense of community and local identity.

Oldham residents will be healthy, safe and well-supported, having a great start from early years and with skills for life. They will have access to local community facilities and health and well-being provision and will have active and healthier lifestyles gained from access to active travel and green infrastructure. Opportunities for excellent education, training and life-long learning will be available to all Oldham residents, raising aspirations and reducing inequalities. Providing residents with a great start and skills for life so that they can make the most of opportunities available to them, whilst meeting the needs for local businesses and helping to attract and retain new business opportunities.

New energy efficient development will be brought forward in line with co-design expectations and design codes developed with Oldham's communities, whilst the key characteristics of Oldham's townscape and landscape types and Oldham's historic environment and rich heritage will be conserved and enhanced.

7. Local Plan incorporated approaches

7.1 Throughout the Local Plan several credited and established design and planning approaches have been adopted which, look to improve health (including mental health) and wellbeing, reduce health inequalities, enable behaviour changes, create healthy and inclusive environments, support COVID-19 recovery, strengthen and support resilience.

7.2 The Local Plan is guided by the [National Planning Policy Framework](#)¹ and its supporting documents, Places for Everyone and its supporting guidance, published guidance from health bodies for example Public Health England and planning and design professional bodies/organisations for example the [Royal Town Planning Institute \(RTPI\)](#)², [Town and Country Planning Association \(TCPA\)](#)³ and [Design Council](#)⁴. Some of the approaches incorporated in the Local Plan include the following:

- Diverse and affordable homes
- Well-connected paths, streets and spaces
- Good green spaces in the right places
- Local food growing
- Keeping jobs and money local
- Community health and wellbeing facilities
- A place for all.

7.3 [Sport England's Active Design](#)⁵ 10 principles and guides are already, embedded within overlapping disciplines related to open space and landscape, transport, access and design and layout. The Active Design principles cover:

- Activity for all neighbourhoods
- Appropriate infrastructure
- Walkable communities
- Active buildings
- Connected walking and cycling routes
- Management, maintenance, monitoring and evaluation

¹ This document can be found at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² This website can be found at: www.rtpi.org.uk

³ This website can be found at: <https://www.tcpa.org.uk/>

⁴ This website can be found at: <https://www.designcouncil.org.uk/>

⁵ This document can be found at: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

- Co-location of community facilities
- Network of multifunctional open space
- Activity promotion and local champions
- High quality streets and spaces

7.4 The principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.

7.5 [TfGM Streets for All](#)⁶ help create a vibrant, successful city where people can live active, healthy lives. The Streets for All Approach looks to make our neighbourhoods a healthier, more sustainable, safer and more connected. The easiest way for most of us to stay active is by walking or cycling as part of our daily travel. Several policies in the Local Plan look to deliver and have incorporated the Streets for All Approach such as, the transport, design and green infrastructure policies.

8. Other assessments

8.1 This section takes a brief look at other assessments that are statutory required as part of the planning process for Local Plans at each stage towards adoption. Some of these assessments do look at human health to some degree.

8.2 [Integrated Assessment \(IA\)](#): Oldham's Integrated Assessment (incorporating Strategic Environmental Assessment (SEA), aim is to promote sustainable development by integrating social, economic, and environmental considerations into the preparation of new or revised plans and strategies. SA/SEA's are a valuable tool for developing sound planning policies and planning development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.

8.3 The SEA assesses the likely significant effects on the environment including short-, medium- and long-term effects; and permanent and temporary effects including secondary, cumulative and synergistic effects, on issues such as: Biodiversity,

⁶ This document can be found at:

https://downloads.cffassets.net/nv7y93idf4jq/1QctaoP2MVNOXjJ9ibSTc2/1a9a6007461e8501ef3ad08ecd54a49f/Streets_for_All_Strategy_Dec21_WEB-A3.pdf

Population, Human health, Fauna, Flora, Soil, Water, Air, Climatic factors, Material assets, Cultural heritage, including architectural and archaeological heritage, Landscape and inter-relationship between the issues.

- 8.4 [Habitat Regulation Assessments \(HRA\)](#):⁷ The EC (European Commission) Habitats Directive 1992 and Wilds Birds Directive 2009 (transposed into) United Kingdom law, by the Conservation of Habitats and Species Regulations 2017 (as amended) require a Habitats Regulations Assessment (HRA) of land use plans. Establish whether the plan, alone, or in combination with other plans or projects, is likely to have a significant effect on an international nature conservation site (Special Protection Areas (SPA), Special Areas of Conservation (SAC) or Ramsar sites). This is known as, the Habitat Regulation.
- 8.5 Under the Regulations, local planning authorities must undertake an HRA where, a plan or project is likely to have a 'significant effect' upon a European site, either individually or in combination with other projects.
- 8.6 **Equalities Impact Assessment (EqIA)**: [The Equality Act 2010](#)⁸ replaces earlier anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection; and sets out the different ways in which it is unlawful to treat someone. Before the Act came into force there were several pieces of legislation to cover discrimination, including:
- Sex Discrimination Act 1975
 - Race Relations Act 1976
 - Disability Discrimination Act 1995
- 8.7 In 2011, the Act extended protection against discrimination to ten 'Protected Characteristics'- which includes the following: Age, Disability, Carers, Sex/Gender, Race or belief, Religion, Sexual Orientation, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity
- 8.8 The EqIA is addressed through the Oldham Impact Assessment tool. This is a tool that has been developed by Oldham Council to assess the impact of relevant policies, programmes and decisions on equalities characteristics as well as our corporate priorities and the Future Oldham aims. It helps to ensure the decisions made within Oldham Council fit with the council's visions and priorities within the council's Corporate Plan and 'Our Future', a plan developed with partners. It also

⁷ Further information can be found at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

⁸ Further information can be found at: <https://www.gov.uk/guidance/equality-act-2010-guidance>

helps the Council to treat residents (and non-residents) fairly, assessing the impact of decisions on different groups of people with protected characteristics. The Impact Assessment Tool was completed by planning policy.

9. Health impact assessment

9.1 The London Healthy Urban Development Units (HUDU): Rapid Health Impact Assessment Tool developed as a tool to assess the health impacts of development plans and planning applications. The HUDU tool has influenced Oldham’s assessment. The following assessment assess the impact of the Local Plan.

Housing design and affordability

Figure 4: Housing design and affordability assessment

Assessment criteria	Policy that meets this requirement
Does the plan address the housing needs of older people for example extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	Policy H1: Delivering a Diverse Housing Offer Policy H2: Housing Mix Policy H4 - Homes for Older People Policy H5 - Homes for Disabled People
Does the plan include homes that can be adapted to support independent living for older and disabled people?	Policy H2: Housing Mix Policy H4 - Homes for Older People Policy H6 – Homes for Children and Care Leavers
Does the plan promote good design through layout and orientation, meeting internal space standards?	Policy H2: Housing Mix Policy H3: Housing Density Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development

Assessment criteria	Policy that meets this requirement
Does the plan include a range of housing types and sizes, including affordable housing responding to local housing needs?	Policy H1: Delivering a Diverse Housing Offer Policy H2: Housing Mix Policy H3: Housing Density Policy H4 - Homes for Older People Policy H5 - Homes for Disabled People Policy H6 – Homes for Children and Care Leavers Policy H7 - Affordable Housing Policy H10 - Houses in Multiple Occupation Policy H11 - Custom/ Self-Build and Community-led Housing Policy H12 - Gypsies, Travellers and Travelling Showpeople Policy H13 - Housing and Residential-Led Mixed-Use Allocation
Does the plan support and seeks to delivery homes that are highly energy efficient?	Policy CC1 – Sustainable Construction, Energy Efficiency and Retrofitting PfE JP-S2 – Carbon & Energy

- 9.2 Overall housing in Oldham is of good quality; however, there are high levels of overcrowding in the west of the borough. As with other parts of Greater Manchester, the cost of housing is less affordable for many. The need for more genuine affordable housing is crucial. More importantly, secure, safe, warm and energy efficient homes is a key determinant of health.
- 9.3 PfE sets out that Oldham is required to deliver 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year. This is, based on a detailed analysis of land availability and capacity across Oldham.
- 9.4 The housing policies with other policies for example the design policies look to ensure that the right homes are, delivered to meet Oldham’s housing needs, including homes for disabled people, older people and vulnerable people. With the design policies, they ensure that new homes meet the highest design standards, which are sustainable, energy efficient and contribute positively to creating healthy, inclusive and safe neighbourhoods for all (including women, children and older people).

9.5 The Local Plan recognises the importance of early engagement between the council, developer and Registered Providers. The council will continue to engage and work with housing providers to ensure the right housing is, delivered for our communities.

Social infrastructure and accessibility

Figure 5: Social infrastructure and accessibility

Assessment criteria	Policy that meets this requirement
Does the plan keep or re-supply existing social infrastructure?	Policy C2 - Local Services and Facilities Policy CO4 Cultural, Community and Health Facilities Policy CO5: Education and Skills Policy IN2 – Planning Obligations
Does the plan assess the impact on health and social care services and has local NHS (National Health Service) organisations been contacted about existing and planned healthcare capacity?	Infrastructure Delivery Plan Policy CO4 Cultural, Community and Health Facilities Policy IN2 – Planning Obligations
Does the plan include the provision or replacement of a healthcare facility and does the facility meet NHS requirements?	Policy CO4 Cultural, Community and Health Facilities Policy IN2 – Planning Obligations
Does the plan assess the capacity, location and accessibility of other social infrastructure, e.g., primary, secondary and post 19 education needs and community facilities?	Policy CO4 Cultural, Community and Health Facilities Policy CO5: Education and Skills Policy CO6: Securing Educational Places through New Residential Development Policy IN2 – Planning Obligations

Assessment criteria	Policy that meets this requirement
Does the plan explore opportunities for shared community use and co-location of services?	Infrastructure Delivery Plan Policy CO2 – New and Improved Open Spaces Policy CO4 Cultural, Community and Health Facilities Policy IN2 – Planning Obligations

9.6 Oldham’s Infrastructure Delivery Plan (IDP) and health documents mentioned earlier in this document support the infrastructure policies. The IDP has been, shaped in partnership with key stakeholders for example the NHS and other health bodies/organisations. It identifies the anticipated strategic requirements for the provisions of a range of different infrastructure types across the borough. These include transport, health, education, green and blue infrastructure, sport and leisure.

Access to open space and nature

Figure 6: Access to open space and nature assessment

Assessment criteria	Policy that meets this requirement
Does the plan keep and enhance existing open and natural spaces?	Policy CO1 - Protection of Existing Open Spaces Policy CO2 - New and Enhanced Open Spaces Policy CO3 - Open Space Standards Policy N1 Protecting Nature Policy N2 – Restoring Nature Policy N3 Enhancing Green Infrastructure through development

Assessment criteria	Policy that meets this requirement
	<p>Policy OL2 Protecting and enhancing Oldham's Green Belt</p> <p>Policy OL4 Local Green Space</p>
<p>In areas of deficiency, does the plan supply new open or natural space, or improve access to existing spaces?</p>	<p>Policy CO2 - New and Enhanced Open Spaces</p> <p>Policy CO3 - Open Space Standards</p> <p>Policy N3 Enhancing Green Infrastructure through development</p>
<p>Does the plan supply a range of play spaces for children and young people?</p>	<p>Policy CO2 - New and Enhanced Open Spaces</p> <p>Policy CO3 - Open Space Standards</p> <p>Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development</p> <p>Policy D6 – Creating a Better Public Realm in Oldham</p>
<p>Does the plan provide links between open and natural spaces and the public realm?</p>	<p>Policy CO2 - New and Enhanced Open Spaces</p> <p>Policy CO3 - Open Space Standards</p> <p>Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development</p> <p>Policy D6 – Creating a Better Public Realm in Oldham</p> <p>OTC1 – Oldham Town Centre</p> <p>OTC3 – Creating a Better Public Realm for Oldham Town Centre</p>

Assessment criteria	Policy that meets this requirement
Are the open and natural spaces welcoming and safe and accessible for all?	Policy CO1 - Protection of Existing Open Spaces Policy CO2 - New and Enhanced Open Spaces Policy CO3 - Open Space Standards
Does the plan set out how new open space will be managed and maintained?	Policy CO2 - New and Enhanced Open Spaces Policy CO3 - Open Space Standards Policy IN2 – Planning Obligations

- 9.8 The Local Plan acknowledges benefits and the importance of access to Green Infrastructure (GI) for improving physical and mental health/wellbeing of all. The policies aim to ensure Oldham is still an attractive and green borough, through the protection and enhancement of green infrastructure and its natural environment, contributing to reducing the effects of climate change and improve health and wellbeing. The green infrastructure policies have been informed by the following evidence:
- 9.9 Oldham’s Green Infrastructure Strategy - The GI Strategy identifies that over 75% of Oldham borough is Green Infrastructure (GI). This includes agricultural land (25%), semi-natural habitat (18%), private gardens (12%), deciduous woodland (6%) and amenity space (6%). The Strategy identified place-based opportunities based on seven priority GI themes of Thriving Wildlife; Carbon Neutral Oldham; Healthy and Active Communities; Green Access for All; Distinctive Landscapes; Slowing the Flow and Water Quality and Sustainable Growth and Green Jobs. Policies within the Local Plan such as N3 and OTC4 have been informed by these opportunities.
- 9.10 The Open Space Study (2022) identified and assessed open space provision within the borough, including that of parks and gardens, amenity greenspace, natural/ semi-natural, provision for children and young people, outdoor sports facilities, churchyards and cemeteries, civic spaces, green corridors and allotments. The Study found that there are 1,159 open space sites in the borough, with a total area of 1,578 hectares. Natural and semi-natural greenspace

accounts for the majority of this space (42% or 678 hectares). The total open space equates to 6.61 hectares per 1,000 population.

- 9.11 The Study identified that there were deficiencies in current and expected future provision of amenity greenspace and provision for children and young people. In terms of quality, the Study found that approximately 57% of the borough’s open spaces assessed were at least ‘good quality’, as such 43% are in need of improvement. The Study also considered access to open space and found that there were some deficiencies for each ward in terms of access to specific provision. A Playing Pitch Strategy is currently being prepared which will provide further evidence in terms of Outdoor Sports Provision.
- 9.12 Policies CO1, CO2 and CO3 aim to improve access to, the quality of and amount of open space provision in the borough. New development can assist in contributing to improving the provision of these spaces and can facilitate improvements in access to open space provision, by providing sufficient high-quality spaces as part of developments or by contributing to existing provision in line with the deficiencies identified in the Open Space Study.

Air quality, noise and neighbourhood amenity

Figure 7: Air quality, noise and neighbourhood amenity assessment

Assessment criteria	Policy that meets this requirement
Does the plan minimise construction impacts such as dust, noise, vibration and odours?	Policy LE1 - Noise Pollution and Vibration in New Development Policy LE3 - Air Quality PfE JP-C7 – Transport Requirements of New Development
Does the plan minimise air pollution caused by traffic and energy facilities?	Policy LE3 - Air Quality Policy T1 – Delivering Oldham’s Transport Priorities Policy CC2 Renewable & Low Carbon Energy

Assessment criteria	Policy that meets this requirement
Does the plan minimise noise pollution caused by traffic and commercial uses?	Policy LE1 - Noise Pollution and Vibration in New Development Policy T1 – Delivering Oldham’s Transport Priorities Policy T2 – Creating Sustainable Streets Policy CO9 Creating Sustainable and Accessible Communities

9.17 Air quality is a key concern for our residents. Pollution in Oldham comes from a variety of sources, the main sources of NO2 are transport, domestic gas boilers and static non-road mobile machinery.

9.18 The main sources of particulate matter are:

- Road transport;
- Re- suspended dust from roads and surfaces; and
- Static non-road mobile machinery.

9.19 The Environment Audit Committee has estimated that total health costs because of air pollution range between £8.5 billion and £20.2 billion a year. Poor air quality can also have an economic impact by reducing productivity among people of working age. Department for Environment, Food and Rural Affairs (Defra) estimated that in 2012, poor air quality cost the UK economy £2.7 billion through productivity loss.

9.20 Policy LE3 Air Quality seeks to improve air quality and mitigate the impacts of air pollution. Several policies including green and blue infrastructure policies will play a role in reducing and mitigate against the exposure to poor air quality and other pollutants (including land contamination, noise and light). The Local Plan clearly outline steps to be taken to improve air quality by developers by way of design and layout.

9.21 The policy states that development proposals must consider the impact of introducing new developments in areas already subject to poor air quality.

9.22 Where necessary, applicants will be, expected to carry out noise assessments and provide details of the noise levels on the site. Where noise mitigation measures will be, needed to enable development to take place, an outline application will not normally be acceptable. The council will seek financial contributions using Planning Obligations towards air quality and noise measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact.

Accessibility and active travel

Figure 8: Accessibility and active travel assessment

Assessment criteria	Policy that meets this requirement
Does the plan prioritise and encourage walking, for example using shared spaces?	Policy T1 – Delivering Oldham’s Transport Priorities Policy T2 – Creating Sustainable Streets Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments Policy D6 – Creating a Better Public Realm in Oldham Policy CO9 Creating Sustainable and Accessible Communities Policy N3 – Enhancing Green Infrastructure through development
Does the plan prioritise and encourage cycling, for example by providing secure cycle parking, showers and cycle lanes?	PfE JP-C5 – Walking & Cycling Policy T2 – Creating Sustainable Streets Policy T5 – Transport Statements, Assessments and Travel Plans in New Development Policy OTC3 – Creating a Better Public Realm for Oldham Town Centre Policy OTC4 – Green Infrastructure within and around Oldham Town Centre
Does the plan connect public realm and internal routes to local and strategic cycle and walking networks?	PfE JP-C4 Streets for All PfE JP-C5 – Walking & Cycling Policy T1 – Delivering Oldham’s Transport Priorities

Assessment criteria	Policy that meets this requirement
	<p>Policy T2 – Creating Sustainable Streets Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments Policy D6 – Creating a Better Public Realm in Oldham Policy N3 – Enhancing Green Infrastructure through development Policy OTC1 – Oldham Town Centre Policy OTC3 – Creating a Better Public Realm for Oldham Town Centre Policy OTC4 – Green Infrastructure within and around Oldham Town Centre</p>
<p>Does the plan include traffic management and calming measures to help reduce and minimise road injuries?</p>	<p>PfE JP-C7 Transport Requirements of New Development Policy T1 – Delivering Oldham’s Transport Priorities Policy T2 – Creating Sustainable Streets Policy T5 – Transport Statements, Assessments and Travel Plans in New Development</p>
<p>Is, the plan well connected to public transport, local services and facilities?</p>	<p>PfE JP-C3 Public Transport Policy T1 – Delivering Oldham’s Transport Priorities Policy T2 – Creating Sustainable Streets Policy T5 – Transport Statements, Assessments and Travel Plans in New Development Policy C2 - Local Services and Facilities Policy CO9 - Creating Sustainable and Accessible Communities</p>

Assessment criteria	Policy that meets this requirement
Does the plan look to reduce, car use by reducing carparking provision, supported by the controlled parking zones, car clubs and travel plans measures?	Policy T1 – Delivering Oldham’s Transport Priorities Policy T2 – Creating Sustainable Streets Policy T3 – Car Parking Standards in Oldham Policy T5 – Transport Statements, Assessments and Travel Plans in New Development
Does the plan allow people with mobility problems or a disability to access buildings and places?	PfE JP-C4 Streets for All Policy T1 – Delivering Oldham’s Transport Priorities Policy T2 – Creating Sustainable Streets Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments Policy D6 – Creating a Better Public Realm in Oldham

- 9.24 In terms of active travel, Oldham has a lower rate of cycling than the Greater Manchester average; however, cycling infrastructure generally in Oldham is not as well developed. This is likely to result in certain sections of society being discouraged from using active travel options that can increase physical activity and improve health and wellbeing. Overall, Oldham has good access to public transport via train, bus and tram. However, the west of the borough has much greater GMAL levels (Greater Manchester Accessibility Level) between 4- 8 GMAL when compared to the east of the borough (2- 4 GMAL). The inequalities in access to transport limits and can create a barrier to employment opportunities and other essential services such shops, community and social services, across Oldham.
- 9.25 Many Oldham residents have behavioural risk factors that contribute to ill health. All these behavioural risk factors are key contributors to the leading causes of ill health and premature death in Oldham most notably cancer and circulatory diseases. Again, these risk factors can be associated with deprivation, certain occupations and quality of housing where outcomes are lower in the west of the Oldham when compared to the east of Oldham.

- 9.26 The Local Plan recognises that Oldham’s transport network plays a vital role in connecting communities and enabling people to access homes, jobs, education, services and leisure activities and accommodating these travel needs creates several challenges for the transport network. Traffic volumes in Oldham have continued to increase over the last decade; this contributes towards road congestion, and cars dominating in many of Oldham’s street environments. Major roads that carry heavy and fast flows of traffic create a noisy and unpleasant environment. They can also act as barriers that physically separate communities and can be intimidating and potentially dangerous for pedestrians and cyclists. Not forgetting that transport is also a major producer of the vehicular emissions that contribute towards climate change and poor air pollution.
- 9.27 Oldham’s Transport Strategy and Delivery Plan sets the strategic direction for travel and mobility within Oldham, identifying transport requirements that align with our future growth needs and in response to changing travel technologies. It reflects the [Greater Manchester Transport Strategy 2040](#)⁹ which sets out the long-term vision for how the transport system needs to change across Greater Manchester and the key priorities for achieving this, including reference to:
- the “Right-Mix” ambition for at least 50% of all journeys to be made by active travel and public transport by 2040;
 - details of the Greater Manchester Mayor’s ‘Our Network’ plan to create an integrated, modern and accessible transport network;
 - an increased emphasis on the importance of cycling and walking; and
 - the climate emergency declared by GMCA and all ten councils; and the development of the Greater Manchester Clean Air Plan.
- 9.28 As set out in Oldham’s Transport Strategy, planning for transport that is suitable for the future requires a balance of healthier travel behaviours and reducing harmful transport emissions. The Strategy is structured around six principal transport ambitions which have a focus on:
- Healthy Oldham: providing for healthier active travel choices through, for example, improving walking and cycling routes and facilities to enhance connections across our neighbourhood, the borough and beyond;
 - Safe Oldham: improving road and travel safety;
 - Thriving Oldham: supporting Greater Manchester’s ambitions to grow economically and connecting our communities to services and opportunities across the borough and beyond;
 - Clean Oldham: improving air quality and supporting Greater Manchester’s ambitions for becoming carbon neutral by 2038;
 - Connected Oldham: prioritising the maintenance of highways, footways and Public Rights of Way; and

⁹ This document can be found at: <https://tfgm.com/2040-transport-strategy>

- Accessible Oldham: improving access to public transport and active travel reflecting its importance for reducing deprivation whilst supporting our communities.

9.29 The transport policies aim to enable residents to make more active travel choices as part of their daily lives and seeks to improve their health and wellbeing. The policies promote and seeks to enable a shift to sustainable travel modes and lower emissions vehicles, by creating safer transport networks accessible for all, including walking and cycling. This will be vital to decarbonise activities by 2050 and to reduce the impact of air pollution to within legal limits. In addition, the transport policies seek to ensures that, new development is adequately managed and integrated with the transport network, including public transport, pedestrian and cycle networks in a sustainable manner which does not contribute further to air quality deterioration, increased noise and congestion.

Crime reduction and community safety

Figure 9: Crime reduction and community safety assessment

Assessment criteria	Policy that meets this requirement
Does the plan incorporate elements to help Design Out Crime?	Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments Policy D6 – Creating a Better Public Realm in Oldham Policy OTC2 – Oldham Town Centre Conservation Area
Does, the plan incorporate design techniques to help people feel secure and avoid creating ‘gated communities’?	Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments Policy D6 – Creating a Better Public Realm in Oldham

Assessment criteria	Policy that meets this requirement
Does the plan include attractive, multi-use public spaces and buildings?	Policy OTC1 - Oldham Town Centre Policy OTC2 – Oldham Town Centre Conservation Area Policy OTC3 – Creating a Better Public Realm for Oldham Town Centre Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments Policy D4 – Creating Better Views, Gateways and Taller Buildings Policy D6 – Creating a Better Public Realm in Oldham Policy CO3 – Open Space Standards Policy N3 - Enhancing Green Infrastructure through development

- 9.30 The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing. Oldham suffers from a higher rate of crime than the England average. At 123.1 crimes per 1,000 people, that was far higher than the rate across England and Wales, which stood at 85.5. Unfortunately, it is not possible to compare with previous years.
- 9.33 The policies have informed and been influenced by several design best practices for example TfGM’s Streets for All, National Design Guide, [Secured by Design principles](#), Sport’s England Active Design principles and 20 Minute neighbourhood approaches.
- 9.34 The Local Plan recognises how our streets, town centres, public spaces and neighbourhoods look, feel and function is important for our sense of wellbeing and safety. Developments in the borough will need to meet the highest standards of

design, contribute to creating safe and accessible environment for all including women, children, disabled people and older people.

9.35 The design policies seek to create well-designed places and buildings, improve accessibility of our environments and spaces, and create a strong sense of community.

Access to healthy food

Figure 10: Access to healthy food assessment

Assessment criteria	Policy that meets this requirement
Does the plan ease the supply of local food, for example allotments, community farms and farmers' markets?	Policy N3 Enhancing Green Infrastructure through development Policy TM2 - Farm Diversification Policy CO1 - Protection of Existing Open Spaces Policy CO2 - New and Enhanced Open Spaces Policy CO3 - Open Space Standards
Are there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Policy C1 - Our Centres Policy C2 - Local Services and Facilities Policy OTC1 – Oldham Town Centre Policy TM1 – Tourism Policy TM2 - Farm Diversification Policy E1 – Business and Employment Areas Policy E2 - Exceptions within Business and Employment Areas and other existing employment sites
Does the plan avoid contributing towards an over-concentration of hot food takeaways in the local area?	Policy CO7 – Health Impact Assessments in New Development Policy CO8 Hot Food Takeaways

9.37 In Oldham there is a concern with impacts of the over concentration of hot food takeaways, particularly in the west of Oldham which are characterised as areas of deprivation. High levels of deprivation in Oldham coincide with a high prevalence of unhealthy weight and high numbers of fast-food outlets. This mirrors the position nationally, where increased access to fast food outlets in the most deprived areas has been shown to adversely impact unhealthy weight and health inequalities. Several policies in the Local Plan including the health and wellbeing, town centres and green infrastructure policies, recognises the important access to local food and shops, opportunities to grow your own food and its contribution in tackle Oldham’s obesity and other health issues. Local food growing can help to create healthier food environments, improve food security, promote healthy and active lifestyles, help to improve social, and community cohesion. Allotments not only offer biodiversity and conservation value but also bring recreational, health and social benefits, by allowing residents to grow fresh produce. In addition, the Local Plan states that it is important that allotments continue to be, protected while new spaces for growing food are also encouraged.

Access to work and training

The plan supports the delivery of managed workspaces through the following policies:

Figure 11: Access to work and training assessment

Assessment criteria	Policy that meets this requirement
Does the plan provide access to local employment and training opportunities, including temporary construction and permanent ‘end-use’ jobs?	Policy IN3 - Delivering Social Value and Inclusion Policy E1 – Business and Employment Areas Policy E2 - Exceptions within Business and Employment Areas and other existing employment sites Policy E3 – Reuse and redevelopment of Mill Buildings Policy E4 – Office, Industry and Warehousing Allocation
Does the plan provide childcare facilities?	Policy CO4 Cultural, Community and Health Facilities Policy CO5: Education and Skills Policy CO6: Securing Educational Places through New Residential Development

Assessment criteria	Policy that meets this requirement
Does the plan include managed and affordable workspace for local businesses?	Policy E1 – Business and Employment Areas Policy E2 - Exceptions within Business and Employment Areas and other existing employment sites Policy E3 – Reuse and redevelopment of Mill Buildings Policy OTC1 – Oldham Town Centre
Does the plan include opportunities for work for local people via local procurement arrangements?	Policy IN3 - Delivering Social Value and Inclusion

- 9.41 Oldham Council and the Local Plan support good employment that provides a stable income and improves skills which supports good mental health and wellbeing. The impact of the COVID-19 pandemic on jobs, livelihoods and the economy have already been widespread and as it continues to affect the economy, the greater the risk of long-term scarring and permanently lower economic activity, with business failures, persistently higher unemployment and lower earnings. [Oldham Council's Covid Recovery Strategy](#)¹⁰ stated that businesses had reported significant stress as a result of the pandemic and that the start of interest payments on business loans is likely to cause further economic challenges across Oldham. In addition to the challenges and job losses that the pandemic has contributed to in the borough, Oldham has also lost some significant employers (such as the Very Group in Shaw which was a loss of around 2,000 jobs), further adding to unemployment levels.
- 9.42 The NPPF, PfE and Oldham's economic development policies look to optimise employment opportunities for residents by supporting new development of business premise and protection of employment land. The policies also direct new employment opportunities to the most '*appropriate and sustainable locations*'. As well as, seeking to maximise employment, business and other economic development opportunities the policies seek to support the transition to a low carbon economy and a green economy.
- 9.43 The economic with the neighbourhood policies seek remove barriers to local employment and help support sustainable local business growth. Policy IN3 Delivering Social Value ensures that residents and local businesses are, supported within the

¹⁰ This document can be found at: [file:///home/atog/clare.davison/Downloads/Covid_Recovery_Strategy_October_2020_21AV%20\(1\).pdf](file:///home/atog/clare.davison/Downloads/Covid_Recovery_Strategy_October_2020_21AV%20(1).pdf)

borough through local employment, business retention and inward investment opportunities, which will lead to greater local economic growth. Moreover, the Local Plan recognises the opportunities offered by new development, in both the construction and operational phases, to improve residents' access to skills, training and employment. Importantly, securing job placements within the end use of a development, rather than solely in the construction phase will be important to ensure residents fully benefit in the long term from the diverse opportunities economic growth brings.

Social cohesion and inclusive design

Figure 12: Social cohesion and inclusive design assessment

Assessment criteria	Policy that meets this requirement
Does the plan consider health inequalities by addressing local needs?	Policy H1: Delivering a Diverse Housing Offer Policy H2: Housing Mix Policy H3: Housing Density Policy H4 - Homes for Older People Policy H5 - Homes for Disabled People Policy H6 – Homes for Children and Care Leavers Policy H7 - Affordable Housing Policy H10 - Houses in Multiple Occupation Policy H11 - Custom/ Self-Build and Community-led Housing Policy H12 - Gypsies, Travellers and Travelling Showpeople Policy H13 - Housing and Residential-Led Mixed-Use Allocation Policy CO1 - Protection of Existing Open Spaces Policy CO2 - New and Enhanced Open Spaces Policy CO3 - Open Space Standards Policy N1 Protecting Nature Policy N2 – Restoring Nature Policy N3 Enhancing Green Infrastructure through development Policy OL2 Protecting and enhancing Oldham's Green Belt Policy OL4 Local Green Space Policy T1 – Delivering Oldham's Transport Priorities Policy T2 – Creating Sustainable Streets

Assessment criteria	Policy that meets this requirement
	<p>Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development</p> <p>Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments</p> <p>Policy D6 – Creating a Better Public Realm in Oldham</p> <p>Policy CO9 Creating Sustainable and Accessible Communities</p>
<p>Does the plan connect with existing communities, i.e., layout and movement which avoids physical barriers and severance, and land uses and spaces which encourage social interaction?</p>	<p>Policy T1 – Delivering Oldham’s Transport Priorities</p> <p>Policy T2 – Creating Sustainable Streets</p> <p>Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development</p> <p>Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments</p> <p>Policy D6 – Creating a Better Public Realm in Oldham</p> <p>Policy OTC1 – Oldham Town Centre</p> <p>Policy OTC3 - Creating a Better Public Realm for Oldham Town Centre</p> <p>Policy OTC4 - Green Infrastructure within and around Oldham Town Centre</p> <p>Policy CO9 Creating Sustainable and Accessible Communities</p> <p>Policy N3 Enhancing Green Infrastructure through development</p> <p>Policy CO3 - Open Space Standards</p>
<p>Does the plan include a mix of uses and a range of community facilities?</p>	<p>Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development</p> <p>Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments</p> <p>Policy CO4 Cultural, Community and Health Facilities</p> <p>Policy CO5: Education and Skills</p>

Assessment criteria	Policy that meets this requirement
	Policy CO6: Securing Educational Places through New Residential Development Policy C1 – Our Centres
Does the plan provide opportunities for the voluntary and community sectors?	Policy CO4 Cultural, Community and Health Facilities Policy CO5: Education and Skills Policy C1 – Our Centres
Does the plan consider issues and principles of inclusive and age-friendly design?	PfE Policy JP-P1 – Sustainable Places Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments Policy D6 – Creating a Better Public Realm in Oldham Policy H4 - Homes for Older People Policy H5 - Homes for Disabled People

- 9.44 As mentioned earlier in this document the council works with several stakeholders including our active and vibrant voluntary and community sector. The voluntary and community sector already provides a wide range of valuable services and makes a positive contribution to the lives of many in Oldham.
- 9.45 The Local Plan acknowledges that planning can play a pivotal role in influencing key health determinants, especially towards improving long-term outcomes and addressing health inequalities. It understands that delivering health outcomes will be important for the Covid pandemic recovery, reduce inequalities in the borough and support reliance. Delivering growth means prioritising health and wellbeing in all planning decisions. Health in all policies approach is embedded in the Local Plan.

- 9.47 The Policies Map identifies the land designations for Oldham including site allocations, green and blue infrastructure, transport network (including cycle route and footpaths) and historic assets.
- 9.48 Additionally, the Local Plan clearly understands and states that inclusive neighbourhoods go beyond providing physical access and creates solutions that work better for everyone, ensuring that everyone can equally and confidently buildings, transport and public spaces. It is one, which can be, used safely, easily and with dignity by all. Additionally, it is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people.
- 9.50 The infrastructure needs for Oldham, will be primarily to support the additional housing needed over the Local Plan period. The council has identified strategic priorities for health provision, education, transport infrastructure, digital infrastructure, water, wastewater and sewerage provision and supporting future needs of the emergency services (see IDP). Where there is an infrastructure capacity problem, the council will require developers to fund appropriate improvements and where necessary, ensure improvements are, completed prior to occupation.
- 9.51 Social and community infrastructure covers a wide variety of uses. These include community and affordable meeting spaces, libraries, places of worship, education, youth services, childcare and early years, health and social care, services for the elderly or disabled, sport, recreation, informal play spaces, emergency services and other criminal justice or community safety facilities (not intended to be exhaustive list). Policy CO4 places a high priority on the provision and improvement of social and community infrastructure. Any proposal for a loss of social and community infrastructure will have meet the criteria set out in Policy CO4.
- 9.52 Any site allocations development proposal will be determined against planning polices (as well as PfE and NPPF).

Minimising the use of resources

Figure 13: Minimising the use of resources

Assessment criteria	Policy that meets this requirement
Does the plan make best use of existing land?	<p>Local Plan site allocations, across the borough</p> <p>Policy H1 – Delivering a Diverse Housing Offer</p> <p>Policy H2 – Housing Mix</p> <p>Policy H3: Density of New Housing</p> <p>Policy H13 - Housing and Residential-Led Mixed-Use Allocations</p> <p>Policy E4 – Employment Allocations</p> <p>Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development</p> <p>Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments</p> <p>Policy D6 – Creating a Better Public Realm in Oldham</p> <p>Policy T2 – Creating Sustainable Streets</p>
Does the plan encourage recycling, including building materials?	<p>PfE JP-P1 Sustainable Places</p> <p>PfE JP-S7 Resource Efficiency</p> <p>Policy CC1 – Sustainable Construction, Energy Efficiency and Retrofitting</p> <p>Policy HE1 – The Historic Environment</p> <p>Policy HE2 Securing the Preservation and Enhancement of Oldham's Heritage Assets</p> <p>Policy HE4 Oldham's Mills</p>

Assessment criteria	Policy that meets this requirement
Does the plan incorporate sustainable design and construction techniques?	PfE JP-P1 Sustainable Places PfE JP-S7 Resource Efficiency Policy CC1 – Sustainable Construction, Energy Efficiency and Retrofitting Policy CC4 - Sustainable Drainage – Foul and Surface Water Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments

- 9.53 Policy CC1 – Sustainable Construction, Energy Efficiency and Retrofitting requires high design standards which are, sustainably designed and constructed from new development, change of use, conversions and refurbishments and that all development makes effective use of resources and materials, minimises water use, and assists in meeting local and national carbon reduction targets. The Local Plan acknowledges the national sustainable design and construction standards such as BREEAM (Building Research Establishment Environmental Assessment Method) which ensures that a development’s full impact on the environment, including water use, transport and land use and ecology, as well as energy use and waste are considered and addressed.
- 9.54 Places for Everyone also recognises the need to minimise the use of resources, principally through policy JP-S7 Resource Efficiency. The policy states support for the achievement of a circular economy and a zero-waste economy and the key role that it will play in meeting Greater Manchester’s ambition of becoming a leading green city region by 2038. The policy outlines the following measures to help achieve this:

- Development and implementation of the Resource Zero Waste Strategy for Greater Manchester which promotes overall reduction in the level of waste produced and supports resource efficiency within the Plan area in order to gain the maximum value from the things we produce;
- Ensuring the design of all new development incorporates storage space to facilitate efficient recycling and where appropriate, processing of waste on site;
- Recognition of the role of existing infrastructure in managing our waste and protecting such facilities to ensure adequate waste management capacity is maintained; and
- Using sustainable design and construction techniques to reduce carbon emissions, adapt and future proof to the impact of climate change, reduce and recycle waste and minimise water use.

Climate change

Figure 14: Climate change

Assessment criteria	Policy that meets this requirement
Does the plan incorporate renewable energy?	PfE JP-S2 Policy CC2 Renewable & Low Carbon Energy
Does the plan ensure that buildings and public spaces are designed to respond to winter and summer temperatures, for example ventilation, shading and landscaping?	PfE JP-S2 Policy D1 – A Design-Led Approach for Residential & Residential-Led Mixed-Use Development Policy D2 – A Design Led Approach to Non-Residential, Commercial and Employment Developments Policy D6 – Creating a Better Public Realm in Oldham Policy T2 – Creating Sustainable Streets Policy CC1 – Sustainable Construction, Energy Efficiency and Retrofitting Policy N1 - Protecting Nature Policy N2 - Restoring Nature

Assessment criteria	Policy that meets this requirement
	Policy N3 - Enhancing Green Infrastructure through development
Does the plan maintain or enhance biodiversity?	Policy OTC4 - Green Infrastructure within and around Oldham Town Centre Policy OL2 - Protecting and enhancing Oldham's Green Belt Policy N1 - Protecting Nature Policy N2 - Restoring Nature Policy N3 - Enhancing Green Infrastructure through development Policy N4 - Tree Replacement
Does the plan incorporate sustainable urban drainage techniques?	Policy CC3 - Managing Flood Risk Policy CC4 - Sustainable Drainage – Foul and Surface Water Policy OTC4 - Green Infrastructure within and around Oldham Town Centre Policy N3 - Enhancing Green Infrastructure through development

9.55 Oldham Council declared a Climate Emergency in 2020 and is committed to working towards becoming a carbon neutral borough by 2050 and a carbon neutral Council by 2030, in line with the national and regional targets.

9.56 Mitigating climate change is one of the five challenges outlined in the [Greater Manchester Five-Year Environment Plan](#)¹¹. It sets out an aim for our city region to be carbon neutral by 2038 and meet carbon budgets that comply with international

¹¹ This document can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/environment/five-year-environment-plan/>

commitments. The council's Creating a Better Place reflects Oldham's commitment to climate change and seeks to ensure a greener borough by embedding sustainability, energy efficiency & low (zero) carbon. In June 2019, Oldham Council declared its ambition to be the UK's first Green New Deal Council. It subsequently declared a Climate Emergency in September 2019.

- 9.57 The council's [Oldham Green New Deal Strategy](#)¹² was adopted by the council in March 2020. The Strategy's objective is to 'Future-proof the regeneration of the borough by establishing Oldham as an exemplar Green City on energy, carbon, water and green infrastructure'. The Strategy sets two challenging targets for carbon neutrality – 2025 for the council (council buildings and street lighting), and 2030 for the borough (through renewable energy generation, off set measures such as tree planting, developing a Local Energy Market, low carbon heat networks) and puts in place a framework to work with our residents and partners to make Oldham an even greener, smarter, more enterprising place.
- 9.58 Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on public authorities to have regard to the purpose of conserving biodiversity, through policy and decision-making. The council is committed to protecting and enhancing biodiversity, particularly on sites of recognised nature conservation. The protection and enhancement of biodiversity is important, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature.
- 9.59 The council as Lead Local Flood Authority (LLFA) will continue to work in partnership with the Environment Agency, water and sewage companies, developers, neighbouring boroughs and local communities to manage and reduce flood risk from all sources. Policy CC3 - Managing Flood Risk requires all developments to incorporate flood resilience measures and be adaptable to the future impacts of climate change. The policy ensures that all major development includes water efficiency measures such as rainwater harvesting or grey water recycling to minimise water consumption. The Local Plan recognises the importance of SUDS (Sustainable Drainage Systems) to deliver multifunctional benefits such as managing surface water runoff, improving biodiversity, and providing amenity and water quality benefits.

¹² This document can be found at: <https://www.oldham.gov.uk/gnds>

- 9.60 Policy CC4 - Sustainable Drainage – Foul and Surface Water requires all developments to reduce the risk of flooding. The policy stresses that the Council will expect mitigating measures against the impact of flooding from all sources. It ensures all new development including basement and subterranean development implement appropriate SUDS and show sustainable approaches to the management of surface water in line with the Non-Statutory Technical Standards for SUDS. Furthermore, the policy ensures that developers provide plans of the maintenance and long-term management of SUDS through a SUDS Management Plan submitted as part of the planning process. The policy also requires developers to incorporate soft landscaping, appropriate planting (including trees and shrubs) and permeable surfaces into all new developments including non-residential developments, in line with Policy N3 Enhancing Green Infrastructure through development
- 9.61 Places for Everyone deals with Climate Change, primarily through policy JP-S2 Carbon and Energy. The policy has the aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, which will be supported through a range of measures including:
- Promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling;
 - Promoting the use of life cycle cost and carbon assessment tools to ensure the long-term impacts from development can be captured;
 - Taking a positive approach to renewable and low carbon energy schemes, particularly schemes that are led by, or meet the needs of local communities;
 - Keeping fossil fuels in the ground;
 - Planning for a balanced and smart electricity grid by identifying geographical locations which could support energy assets;
 - Increasing the range of nature-based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree planting and natural flood management techniques;
 - Development of Local Area Energy plans to develop cost effective pathways to achieve carbon targets;
 - An expectation that new development will, unless it can be demonstrated that it is not practicable or financially viable; and
 - Be net zero carbon from 2028 by following the energy hierarchy (with any residual carbon emissions offset).

10. Conclusion

- 10.1 It is clear from the above assessment that the Local Plan supports the health priorities of the council and is likely to assist in improving health and wellbeing of Oldham. The Local Plan recognises the importance of working with communities, stakeholders and businesses to make Oldham a healthier, safer and greener place.
- 10.2 In the context of this HIA, it seeks to (summary):
- Improve air quality, tackling climate change and adopting flood mitigation such as Sustainable Design measures (SUDS).
 - Deliver good quality, well designed homes (including affordable homes).
 - Enable and encourage more active lifestyles for all.
 - Create healthier, greener and accessible neighbourhoods with easy access to green/blue infrastructure and other essential services.
 - Tackle health and income inequalities across the borough.
 - Incorporate design approaches that will assist in improving health and wellbeing, improving access and movement.
 - Ensure the new development consider health as part of design and layout by requiring an Health Impact Assessment to be carried out as part of development proposals.
 - Promote, encourage and enable healthier lifestyle.

11. Monitoring

- 11.1 The performance of the Local Plan will be, monitored annually in [Oldham's Annual Monitoring Report](#) as statutorily required by the Local Planning Authority (planning policy team). The indicators will be, monitored by Oldham Public Health team, who will report the findings annually to the Health and Wellbeing Board (HWB). If the HWB requires any, further updates or, request research to be undertaken, based on the indicators below, it will be conducted by the public health team. The following indicators are based on the Health and Wellbeing Strategy **start well, live well, age well** in a **healthy place** theme.

Figure 15: Health monitoring indicators

Health and wellbeing strategy themes and selected related Local plan aspirations	Indicator
Start well	
To manage and monitor proposals for new hot food takeaways found within 400m of the boundaries of secondary schools	The number of new hot food takeaways approved within 400m of a secondary school each year.
Live well	
<p>Building affordable homes</p> <p>% of new homes built in Oldham between 2024-2039 to be affordable</p> <p>To deliver a minimum of 11,560 additional homes between 2024-2039</p> <p>Building energy efficient homes</p>	<p>Gross number of affordable homes built in Oldham annually</p> <p>Number of homes built annually</p>
<p>Active design</p> <p>Enabling walking and cycling by improving local infrastructure</p>	<p>% Increase Of adults cycling for 3 days a week</p>
<p>To support economic recovery, business investment and job growth</p>	<p>Unemployment, % of the working age population claiming out of work benefit by ward</p> <p>Proportion of fuel poverty poor</p>

Health and wellbeing strategy themes and selected related Local plan aspirations	Indicator
Tackle the causes of ill health and health inequalities in Oldham.	
Age well	
Dementia friendly environment	Number of planning proposals that have been assessed against Building for a Healthy Life and given nine greens and above.
In a healthy place	
Design the layout of development sites in accordance with the Design-Led Approach and using Building for a Healthy Life and prioritise safe and convenient access routes for pedestrians, cyclists and those with disabilities.	<p>Number of pedestrian or cycling casualties per year</p> <p>Number of planning proposals that have been assessed against Building for a Healthy Life and given nine greens and above.</p>

12. Recommendations

12.1 The HIA recommends that:

- a. Should the Local Plan (once adopted), in the future be, reviewed, updated, or there a need for new Local Plan that, a HIA is, carried out as part of this process. If, a 5-year review of the Local Plan is, carried out, the health impacts will be, assessed in more detail at the time.
- b. The spatial planning team will engage with and consult Public Health team on other development planning documents such as planning briefs and Masterplans. That a HIA is carried out to identify the health impacts of development planning documents and to develop recommendations to maximise the positive impacts and minimise the negative impacts, while maintaining a focus on addressing health inequalities.