

APPLICATION REPORT – FUL/355686/26
Planning Committee 23rd September 2026

Registration Date: 6th March 2026
Ward: Failsworth East

Application Reference: FUL/355686/26
Type of Application: Full Application

Proposal: Erection of 68 no. affordable dwellings (100% affordable housing scheme) with associated works such as access road, turning points and green infrastructure.

Location: Land off Failsworth Road, Failsworth.

Case Officer: Abiola Labisi
Applicant: Redwaters Estates and Redwaters Fitfield (Failsworth)
Agent: Mr Stephen Harris (Emery Planning)

1. INTRODUCTION

- 1.1 The application has been referred to Planning Committee for determination in accordance with the Scheme of Delegation as the application relates to a Major development.

2. RECOMMENDATION

- 2.1 It is recommended that the application be refused for reasons set out in the report, and that the Assistant Director for Planning & Development shall be authorised to issue the decision.

3. SITE DESCRIPTION

- 3.1 The application site is located on the west side of Failsworth Road, Failsworth, and comprises of open fields. The site is stated to be 3.3 hectares in area, is gently undulating in topography, and is wholly located within the Green Belt.
- 3.2 To the immediate north and west of the site are established residential areas while Failsworth Road defines the eastern boundary of the site. To the immediate south are open fields. A stream (Lord's Brook) flows adjacent the southern section of the site and there are some public rights of way in the vicinity of the site. The site is stated to be currently used for grazing purposes.

4. THE PROPOSAL

- 4.1 The application proposes the erection of a total of 68 dwellings, access works and associated green infrastructure. The proposed dwellings would be sited within the northern part of the site while the southern section would be retained as is, with the exception of removal of some invasive species and replacing them with some tree planting.

- 4.2 The scheme would provide 100% affordable housing units and would comprise of four different house types.
- 4.3 House Type A (with an area of 73 square metres) would be a 2 bed two storey unit and would be of three types – detached, semi-detached and terraced. House Type B (with an area of 85 square metres) would be a 3 bed two storey unit and would also be of three types – detached, semi-detached and terraced.
- 4.4 House Type C (with an area of 96 square metres) would be a 3 bed two storey unit with a side entrance and would be of two types – detached and semi-detached. House Type D (with an area of 97 square metres) would be a 4 bed two storey unit and would be of two types – detached and semi-detached.
- 4.5 Access to the site would be taken off Failsworth Road.

5. PLANNING HISTORY

- 5.1 In 1992, under planning application reference PA/028478/92, outline permission was refused for a residential development comprising of the erection of 13no. dwellings for reasons relating to impact on Green Belt and substandard access.

6. RELEVANT PLANNING POLICIES

- 6.1 The adopted Development Plan is the Joint Core Strategy and Development Management Policies Development Plan Document (referred to as the Local Plan) which formed part of the Local Development Framework for Oldham when it was adopted in 2011. The site is designated as Green Belt within the Local Plan. As such, the following policies are considered relevant to the determination of this application:

- Policy 1 - Climate Change and Sustainable Development;
- Policy 3 – An Address of Choice;
- Policy 5 - Promoting Accessibility and Sustainable Transport;
- Policy 9 - Local Environment;
- Policy 10 – Affordable Housing;
- Policy 11 – Housing;
- Policy 18 – Energy;
- Policy 21 - Protecting Natural Environmental Assets;
- Policy 22 - Protecting Open Land.

- 6.2 In addition to the above, the recently adopted Places for Everyone Joint Plan forms part of the Development Plan for Oldham and so the following policies are considered relevant to the determination of the application:

- Policy JP-C1 – An Integrated Network;
- Policy JP-G8 – A Net Enhancement of Biodiversity and Geodiversity;
- Policy JP-G9 – The Green Belt;
- Policy JP-H1 - Scale, Distribution and Phasing of New Housing Development;
- Policy JP-H2 - Affordability of New Housing;
- Policy JP-H3 - Type, Size and Design of New Housing;
- Policy JP-P1 – Sustainable Places;
- Policy JP-S1 – Sustainable Development; and,

- Policy JP-S2 – Carbon and Energy.

7. CONSULTATIONS

CONSULTEE	FORMAL RESPONSE
Environmental Health	Formal response received. Raised no objection subject to conditions relating to land contamination as well as noise mitigation and CMP.
United Utilities	Formal response received. Raised no objection subject to the development being implemented in accordance with submitted drainage details.
Highways	Formal comments received. Recommended refusal on grounds relating to inadequate access and highway safety.
Greater Manchester Ecology Unit	Formal comments received. Raised no objection subject to conditions relating to protection of wildlife and pollution of Lord's Brook.
Coal Authority	Formal response received. Stated that the site does not fall within the Development High Risk Area and therefore raised no objection.
Planning Policy	Formal response received. Objected on grounds relating to impact on Green Belt and site not meeting 'Grey Belt' requirements.
Environment Agency	Formal comments still being awaited at the time of writing the report.
Ramblers	Formal response received. No objection subject to reinstatement of the footpath to a safe condition and provision of retaining wall adjacent the stream.
Greater Manchester Police Crime Prevention	Formal comments still being awaited at the time of writing report.
Natural England	Formal comments received. Raised no objection.
Archaeology	Formal response received. No objection raised.
LLFA	Formal comments received. No objection subject to conditions.
Tree Officer	Formal comments received. No objection subject to submission of a mitigation strategy.

8. PUBLICITY AND THIRD-PARTY REPRESENTATIONS

- 8.1 In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015, and the Council's adopted Statement of Community Involvement, the application has been advertised as a major development by neighbour notification letters, display of a site notice, and publication of a press notice.
- 8.2 In response, 623 objections have been received, while 2 letters of support were received. A petition against the proposal containing 273 signatures was also received. The material planning issues raised in the objection representations are summarised below:
- Impact on Green Belt – noting that the proposal would impact on openness and would be a speculative release of Green Belt land, contrary to policies (addressed in Section 10 of the report).
 - The site is not 'Grey Belt' – noting that the site had never been formally assessed or designated as 'Grey Belt' through the Local Plan process (addressed in Section 10 of the report).
 - Impact on amenity of neighbours – noting that proposal would lead to impact on privacy and outlook (addressed in Section 11 of the report).
 - Flooding and foul drainage issues – with the claim that flood risk assessment has not been based on proven local knowledge (addressed in Section 14 of the report).
 - Adverse impact on wildlife and biodiversity – stating that proposal would lead to unacceptable impact on loss of trees and wildlife including protected species (addressed in Section 15 of the report)
 - Pressure on local amenities and infrastructure – noting that proposal would increase pressure on amenities such as access to GP and road infrastructure (addressed in Section 13 of the report).
 - Housing situation incorrect – noting that this has been exaggerated to support a claim for very special circumstance (addressed in para. 10.8 – 10.9).
 - Highway Issues – noting that access would be close to an existing junction leading to potential highway safety issues (addressed in Section 13 of the report).
 - Pollution of Lord's Brook – noting that proposal would pollute the waterbody and destroy habitat (addressed in Section 15 of the report).

ASSESSMENT OF THE PROPOSAL

9. PRINCIPLE OF DEVELOPMENT

- 9.1 Section 6 of the National Planning Policy Framework highlights the Government's objective to support the delivery of a substantial increase in the supply of homes and traveller sites across the country, by ensuring that a sufficient amount and variety of land can come forward where needed. In addition, Policy JP-H1 (Scale, Distribution and Phasing of New Housing Development) of the Places for Everyone Joint Plan also recognises the need for additional housing and provides that a minimum of 175,185 net additional dwellings will be delivered over the period 2022-2039, or an annual average of around 10,305, across the nine authorities covered by the Joint Plan.
- 9.2 Specifically in relation to affordable housing, Policy HO8 (Providing affordable homes) of the NPPF provides that development proposals should meet or exceed up-to-date

development plan requirements for the proportion and mix of affordable housing tenures relevant to the location, including the minimum proportion of Social Rent.

- 9.3 The proposal would lead to an increase in local housing stock and boost affordable housing in the area, in accordance with local and national policies. In this regard, the principle of the development is considered acceptable.
- 9.4 However, the site is designated as Green Belt, and the type of development proposed is considered to represent 'inappropriate development' unless certain exceptions set out in the NPPF are met. These matters, alongside compliance with other relevant material planning considerations, are assessed further in the following sections of the report.

10. IMPACT ON GREEN BELT

- 10.1 Section 13 (Protecting Green Belt Land) of the NPPF provides that the objective of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Similarly, Policy JP-G9 (The Green Belt) of the Places for Everyone Joint Plan provides that the beneficial use of the Green Belt will be enhanced where this can be achieved without harm to its openness, permanence or ability to serve its five purposes.
- 10.2 Accordingly, Policy GB6 (Control of development in the Green Belt) of the NPPF provides that:
 - (i) Development in the Green Belt is inappropriate unless it falls within one of the categories in policy GB7, and,
 - (ii) Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations.
- 10.3 Policy GB7 of the NPPF (Development which is not inappropriate in the Green Belt) provides a list of categories of development that would not be inappropriate in the Green Belt and therefore should not be regarded as harmful to the Green Belt or be required to demonstrate that very special circumstances exist. The applicant has suggested that the site meets several of these categories of development, namely:
 - d) Limited affordable housing for local community needs under policies set out in this Framework or the development plan (for instance, on a rural exception site); and
 - g) Development where all of the following apply:
 - i. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - ii. There is an evidenced unmet need for the type of development proposed;
 - iii. The development would be in a sustainable location, with particular reference to policy TR3 of this Framework; and
 - iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8.

- 10.4 Taking each of these in turn, the site is not considered a rural exception site as it does not adjoin, nor is it adjacent to, a rural area. The proposed development would be an extension of the Failsworth urban area, and Failsworth could not be described as rural, and so the development proposed could not be considered a rural exception site. The definition of a rural exception site in the glossary of the NPPF also includes for such a site *“to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection”*. The application proposal does not propose such a local connection test for occupiers of the proposed homes and the needs of the Failsworth community are being met through several other developments within the urban area of Failsworth, so such an exception site would be unnecessary even if Failsworth was considered rural.
- 10.5 In relation to Policy GB7(g), all four of the criteria in this need to be met for a proposal to be considered appropriate development in the Green Belt. Whilst it could be argued that points i, iii and iv are met by the development proposal, point ii is not met. Point ii requires that there be an evidenced unmet need for the type of development of proposed and includes a footnote 41 in the NPPF which states:
- “in the case of applications involving the provision of housing, [point ii] means the lack of a five-year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Test result was below 75% of the housing requirement over the previous three years”*
- 10.6 This footnote limits the consideration of whether point ii is met to these two aspects – whether the council can demonstrate a five-year housing land supply in the borough and whether the most recent Housing Delivery Test result for Oldham was below 75%. Oldham Council can demonstrate a five-year housing land supply and the most recent Housing Delivery Test result for Oldham (2025) showed our housing delivery rate was 115% over the period 2022-2025. Therefore, point ii cannot be met.
- 10.7 It is noted that the applicant does argue that the council cannot demonstrate a five-year housing supply, and suggests that certain sites within our housing land supply should not be considered deliverable within 5 years, but the council’s published position on this is clear – that Oldham has 6.36 years’ worth of housing sites that are anticipated to be delivered within the next 5 years.
- 10.8 Given the above, the application proposal is considered inappropriate development in the Green Belt. Therefore, under policy GB6, paragraph 2 of the NPPF, it is essential that very special circumstance must exist for the proposal to be supported.
- 10.9 It is noted that the applicant has stated that they do not consider it necessary to consider whether there are very special circumstances given their conclusion that the site accords with Policy H010 (which is their primary case as set out in Section 6 of the amended Planning Statement) and also Section 7 of the Statement concludes that the site is grey belt. However, the applicant noted that notwithstanding this, if the Planning Authority deems it necessary that very special circumstance is required, the applicant would be of the opinion that very special circumstance do exist as the proposal would address a proven housing crisis, whilst also contributing to biodiversity enhancement and local economy.
- 10.10 Contrary to the applicant’s submission that there is a proven housing crisis, it is noted that the Council can demonstrate a five-year housing land supply and extant planning permissions indicate that housing needs can be met without seeing development of land within the Green Belt. Whilst the proposal would lead to biodiversity enhancement (this is a statutory requirement anyway) and potentially an uplift in local economy, these

are not peculiar to this scheme as any major residential scheme would yield similar benefits.

- 10.11 Of more relevance to the argument of very special circumstances in this case would be that the application proposal involves 100% affordable housing. There is a need for further affordable housing, especially for social rent, in the borough but the sites included in the council's housing land supply include sites from which it is anticipated a significant level of affordable and social rent housing will be provided. Therefore, the fact that the application proposals would contribute towards the delivery of affordable housing is a material consideration that should be given some weight in the consideration of very special circumstances but, on its own, that is not so significant factor in the Oldham housing supply context as to outweigh the potential harm to the Green Belt and any other harm resulting from the proposed development. As such, the Planning Authority would not consider the above factors as amounting to very special circumstances.

11. RESIDENTIAL AMENITY

- 11.1 Having regard to the requirements of Policy 9 of the Oldham Local Plan, the impact of the development on surrounding residents needs to be considered alongside ensuring that the proposals provide suitable accommodation and amenity for future occupiers.
- 11.2 The proposed dwellings would be largely set back from the site's northern and western boundaries and would not therefore give rise to any significant overbearing or overshadowing impacts on the occupiers of the existing dwellings to the north and west. The height of the proposed dwellings would also further minimise any potential overbearing or overshadowing effect. Furthermore, it is considered that by virtue of the separation distance from existing neighbours, as well as its design, the proposal would not lead to significant overlooking of neighbouring private amenity areas.
- 11.3 Therefore, the relationship of the proposed development with existing dwellings to the north and west of the site is considered acceptable in that the scale of the development, as well as the separation distance from the dwellings to the north, would minimise any potential overbearing or overshadowing effect. The design of the proposed dwellings also ensures that there would also be no significant direct overlooking of any neighbouring private amenity area.
- 11.4 Furthermore, any potential noise pollution would be addressed by relevant conditions recommended to be imposed by Environmental Health Officers.
- 11.5 In terms of acceptable internal floor areas, the nationally described space standards require that a 2-bed two-storey dwelling should have an internal floor area of between 70 to 79 square metres, depending on the number of occupants. A 3-bed two-storey dwelling to have an internal floor area of between 84 to 102 square metres. A 4-bed two-storey dwelling should provide 97 to 124 square metres. It is noted that the proposed units would comply with the requirements of the nationally described space standards.
- 11.6 Similarly, Policy JP-H3 of the Places for Everyone Joint Plan requires that new residential development shall comply with the requirements of the nationally described space standards insofar as gross internal floor area as well as bedroom sizes is concerned. As stated above, the proposal would comply with the requirements of the nationally described space standards. The policy also requires that new development should be built to the accessible and adaptable standard in Part M4(2) of the Building

Regulations unless specific site conditions make this impracticable. This requirement has not been addressed within the submission but can be adequately addressed by relevant planning conditions and through building control legislations.

- 11.7 Having regard to the foregoing therefore, it is considered that the proposal would not result in any unacceptable amenity issues.

12. DESIGN AND INTEGRATION WITH LOCAL CHARACTER

- 12.1 Policy DP3 (Key principles for well-designed places) of the NPPF sets out principles and requirements for well-designed places and these include the requirement that development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings. Similarly, PfE Policy JP-P1 requires development to create high-quality sustainable places that respond positively to local character, amongst others.
- 12.2 The area is noted to be characterised by a mix of dwelling types mostly of two storeys in height. The proposed design and the scale of the dwellings would be in keeping with that of existing dwellings in the area. The proposal would also be in keeping with the existing building line as established by the existing development to the north thereby preserving the street scene along Failsworth Road.
- 12.3 Furthermore, the proposal represents a logical extension of built form as the site adjoins an existing built-up area to the north. In this regard, it is considered that the proposal would be in accordance with relevant provisions of Policy JP-P1 (Sustainable Places) of the Places for Everyone Joint Plan which require that development integrates well with and respect local character.

13. HIGHWAY ISSUES

- 13.1 Vehicular access to the site will be formed off Failsworth Road. Policy TR3 (Locating development in sustainable locations) of the National Planning Policy Framework (NPPF) seeks to ensure amongst others that network capacity and highway safety is not comprised and accordingly provides that any significant adverse impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, should be mitigated to an acceptable degree using a vision-led approach.
- 13.2 Policy JP-C8 (Transport Requirements of New Development) of the Places for Everyone Joint Plan also prioritises safe and convenient access to a new development site for all users while Policy 5 (Promoting Accessibility and Sustainable Transport Choices) of the Oldham Local Plan states that the Council will ensure the safety of pedestrians, cyclists and other vulnerable road users by ensuring appropriate highway safety measures and schemes are implemented as part of development proposals.
- 13.3 A Transport Statement prepared by Eddisons has been submitted with the application. The statement concludes largely that the proposed development would not lead to unacceptable highway issues.
- 13.4 The proposal and relevant supporting documents have however been reviewed by the Council's Highway Engineer who has advised that, whilst the proposal is unlikely to be detrimental to network capacity, it is however likely to impact on the safety of users of the highway, noting that the internal access roads to two private shared driveways are

too close to the main access road and its junction with Failsworth Road. This will result in conflict with pedestrians crossing the access road on Failsworth Road. In addition to this, it will result in conflict between drivers turning into and out of Failsworth Road and those drivers using the private shared driveways and the access road in terms of manoeuvring, slowing down and intervisibility.

- 13.5 Furthermore, the Highway Engineer has advised that the amended site layout is not acceptable to the local Highway Authority. Whilst the Applicant has worked with the local Highway Authority to address concerns about the geometry and overall layout, including parking provision, the latest iteration remains unacceptable.
- 13.6 As such, it is considered that the proposal would not be in accordance with relevant provisions of Policy TR3 of the NPPF, Policy JP-C8 of the Places for Everyone Joint Plan and Policy 5 of the Oldham Local Plan.

14. DRAINAGE ISSUES

- 14.1 In relation to planning and flood risk, Policy F7 (Ensuring development is safe from flooding) of the NPPF requires that (i). Development proposals should not present a risk from flooding to potential occupiers, users, or visitors, and should not increase flood risk elsewhere, and (ii). Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused.
- 14.2 Similarly, Policy JP-S4 (Flood Risk and the Water Environment) of the Places for Everyone Joint Plan requires that development should minimise the risk of flooding.
- 14.3 The site is located within Flood Risk Zone 1, which is the zone that is least liable to flooding. The site is approx. 3.3 hectares in area and a Flood Risk Assessment prepared by PG Consulting was submitted with the application. The report concludes that the risk of flooding in relation to the development would be low.
- 14.4 The drainage details submitted have been reviewed by the Lead Local Flood Authority and they have recommended some conditions to be attached to any grant of permission in order to ensure that the development does not lead to unacceptable flooding issues. The conditions recommended include those relating to interception of rainwater, protection of the function of historic waterbodies and the Lord's Brook as well as integration of SUDS.

15. BIODIVERSITY NET GAIN, ECOLOGY AND TREES

- 15.1 Section 19 of the NPPF addresses issues relating to conserving and enhancing the natural environment and in this regard, Policy N2 (Improving the natural environment) provides that to contribute positively to the natural environment, and support nature's recovery, development proposals should minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective.
- 15.2 In line with the above, 10% biodiversity net gain is mandatory under Schedule 7A of the Town and Country Planning Act, 1990 (as inserted by Schedule 14 of the Environment Act, 2021). Similarly, Policy JP-G8 (A net enhancement of biodiversity

and geodiversity) of the Places for Everyone Joint Plan provides that through local planning and associated activities a net enhancement of biodiversity resources will be sought.

- 15.3 In relation to biodiversity net gain, the applicant has submitted a biodiversity appraisal as well as a BNG Metric. The biodiversity appraisal indicates that the proposed development would lead to a net loss of 8.13 area habitat units (-33.34%), a net gain of 0.91 linear hedgerow units (+42.24%), and net gain of 0.52 watercourse habitat units (20.80%). The appraisal notes further that the trading rules have not been met for all habitat types present as the loss of medium distinctiveness other neutral grassland and bramble scrub has not been sufficiently compensated for. Accordingly, offsite mitigation will be secured through a local habitat bank/statutory credits.
- 15.4 The application was reviewed by Greater Manchester Ecology Unit and additional information was requested. The additional information has been reviewed by GMEU and they have confirmed they do not have an objection to the proposal in principle, subject to conditions relating to protection of wildlife, prevention of pollution of the Lord's Brook and biodiversity net gain. Should planning permission be granted, the recommended conditions would be attached to such permission and as such, it is considered that the proposal would be unlikely to lead to unacceptable detrimental impact on wildlife/ecology and the Lord's Brook.
- 15.5 Further in relation to the impact of the proposal on the adjacent Lord's Brook, it is considered pertinent to point out that being a Statutory Main River, Environment Agency were consulted but a formal response had not been received at the time of writing the report. However, Greater Manchester Ecology Unit had recommended a condition relating to the provision of a Construction and Environment Management Plan provision of a CEMP to detail pollution protection measures during construction, particularly for the protection of Lords Brook. It is considered that this condition would ensure adequate protection of the brook from pollution during the construction phase of the development.
- 15.6 In relation to trees, Policy JP-G7 of the Places for Everyone Joint Plan provides that where development would result in the loss of existing trees, there would be a requirement for replacement on the basis of two new trees for each tree lost, or other measures that would also result in a net enhancement in the character and quality of the treescape and biodiversity value in the local area, with a preference for on-site provision. The policy also aims to protect trees and woodland during the construction phase of development.
- 15.7 There are some existing trees and hedges on the site proposed for removal to facilitate the proposed development. An Arboricultural Impact Assessment prepared by Urban Green was submitted with the application and this has been reviewed by the Council's Tree Officer. The Tree Officer notes that the Soft Landscaping Proposal indicates that new trees would be planted to mitigate the impact of the trees removed. These would be planted on site. He notes further that to secure the replacement trees, a condition requiring a mitigation strategy be added to any grant of permission, notwithstanding any details shown on the Soft Landscaping Proposal. Accordingly, a condition requiring that the landscaping plan be implemented as detailed and maintained thereafter would be appropriate in this instance.

16. AFFORDABLE HOUSING AND PUBLIC OPEN SPACE

- 16.1 Policy HO8 (Providing affordable homes) of the NPPF requires that development proposals should meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures relevant to the location, including the minimum proportion of Social Rent. Similarly, Policy JP-H2 (Affordability of New Housing) of the Places for Everyone Joint Plan provides that substantial improvements will be sought in the ability of people to access housing at a price they can afford.
- 16.2 The proposal is for 100% affordable units and would as such comply with the above policies.
- 16.3 In relation to public open space, Policy 23 of the Oldham Local Plan states that the loss of an open space will be permitted where it can be demonstrated that the development brings substantial benefits to the community that would outweigh the harm resulting from the loss of open space. The policy also requires that all Major residential schemes should contribute towards public open space. In the same vein, Policy JP-P7 of the Places for Everyone Joint Plan (Sport and Recreation) requires new development to provide new and/or improved existing facilities commensurate with the demand they would generate.
- 16.4 The site is identified within Cutler Bridge Natural/ Semi-natural greenspace. It is noted that the southern half of the site would be retained and upgraded to enhance its use by members of the public. Notwithstanding the proposed upgrading works to the southern half of the site, the development would lead to a substantial loss of open space (the northern section of the site where the proposed dwellings would be sited). It is considered that the benefits of the enhancement works to the southern section of the site would not outweigh the loss of approximately 1.6 hectares of open space.
- 16.5 In the event that planning permission is granted, a contribution towards public open space commensurate with the loss (approx. 1.6 hectares) should be sought from the applicant, and this can be secured by way of planning legal agreement (Section 106).

17. ENERGY EFFICIENCY

- 17.1 Policy JP-S2 (Carbon and Energy) of the Places for Everyone Joint Plan aims to deliver a carbon neutral Greater Manchester by 2038 and as a result, it is intended that a dramatic reduction in greenhouse gas emission is achieved within the region. In relation to new development, it is therefore expected that all new development should be net zero carbon, unless it can be demonstrated that it is not practicable or financially viable.
- 17.2 Whilst an energy statement which demonstrates how the proposal complies with the requirements of Policy JP-S2 has not been submitted with the application, it is considered that the issue can be addressed by way of relevant planning conditions should permission be granted.

18. CONCLUSION

- 18.1 The site is located within the Green Belt and the proposed development amounts to inappropriate development within the Green Belt. Such development would be harmful and national policies require that they be restricted.

- 18.2 The Planning Authority advised the applicant's agent via a detailed planning policy assessment that the proposal would be contrary to relevant Green Belt policies and the applicant's agent advised that they would review their assessment of the appropriateness of the development on Green Belt land. Their revised assessment of the appropriateness of the proposal has been reviewed however, based on the assessment above, the Planning Authority remains of the view that the proposal would be inappropriate in the Green Belt.
- 18.3 It is noted that some consultees have raised concerns regarding the proposal. However, in this instance, it is not considered necessary to request or give the applicant an opportunity to address the concerns raised by these consultees as this would not resolve the identified inappropriateness of the development.

19. RECOMMENDATION

- 19.1 The application is therefore recommended for refusal for the following reasons:
1. Whilst the site comprises grey belt land, the proposal would not satisfy the requirements of Policy GB7(g)ii of the NPPF neither would the application site constitute a rural exception site as it does not adjoin a rural area. The development would as such amount to inappropriate development within the Green Belt. Such development is, by definition, harmful to the Green Belt and Policy GB6 of the NPPF provides that such inappropriate development should not be approved except in very special circumstances, which have not been demonstrated. The proposal is therefore contrary to the provisions of NPPF Policy GB6, Policy JP-G9 (The Green Belt) of the Places for Everyone Joint Plan and Policies 22 (Protecting Open Land) and 23 (Open Spaces and Sports) of the Oldham Local Plan.
 2. The applicant has failed to demonstrate that adequate vehicular access to the development has been made and this will lead to the manoeuvring of vehicles, generated by the development, within the adjacent highways to the detriment of safety of pedestrians and other highway users. The proposed development is thereby contrary to Development Management Policy 9 of the Oldham Local Development Framework.

SITE LOCATION PLAN (NOT TO SCALE):

