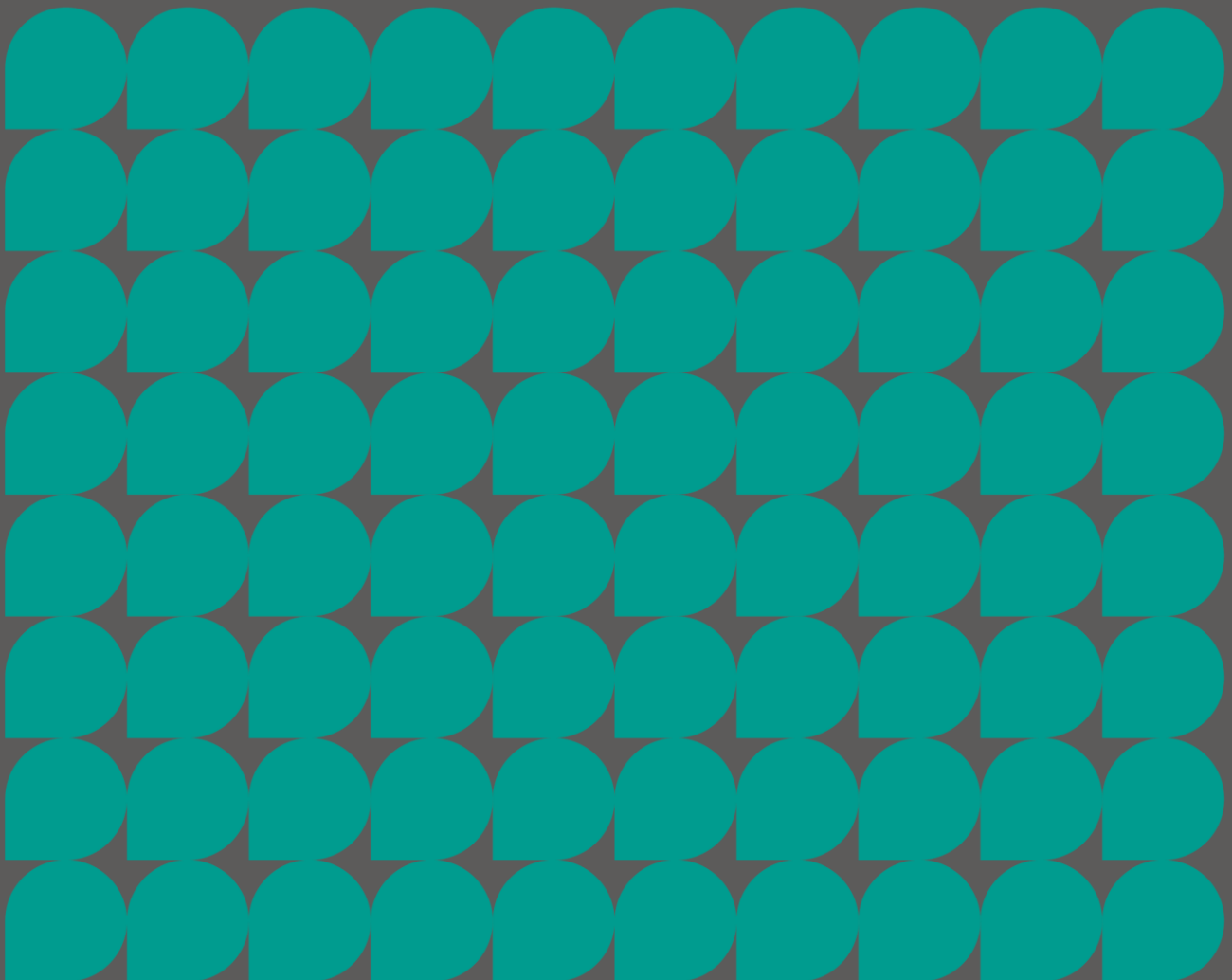


Places for Everyone

JPA13 Bottom Field Farm (Woodhouses) Allocation

Topic Paper

July 2021



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Section A – Background

1.0 Introduction

- 1.1 In November 2014, the AGMA Executive Board recommended to the 10 Greater Manchester local authorities that they agree to prepare a joint Development Plan Document (“Joint DPD”), called the Greater Manchester Spatial Framework (“GMSF”) and that AGMA be appointed by the 10 authorities to prepare the GMSF on their behalf.
- 1.2 The first draft of the GMSF DPD was published for consultation on 31st October 2016, ending on 16th January 2017. Following substantial re-drafting, a further consultation on the Revised Draft GMSF took place between January and March 2019.
- 1.3 On the 30 October 2020 the AGMA Executive Board unanimously agreed to recommend GMSF 2020 to the 10 Greater Manchester Councils for approval for consultation at their Executives/Cabinets, and approval for submission to the Secretary of State following the period for representations at their Council meetings.
- 1.4 At its Council meeting on 3 December Stockport Council resolved not to submit the GMSF 2020 following the consultation period and at its Cabinet meeting on 4 December, it resolved not to publish the GMSF 2020 for consultation.
- 1.5 As a joint DPD of the 10 Greater Manchester authorities, the GMSF 2020 required the approval of all 10 local authorities to proceed. The decisions of Stockport Council/Cabinet therefore signalled the end of the GMSF as a joint plan of the 10.
- 1.6 Notwithstanding the decision of Stockport Council, the nine remaining districts considered that the rationale for the preparation of a Joint DPD remained. Consequently, at its meeting on the 11th December 2020, Members of the AGMA Executive Committee agreed in principle to producing a joint DPD of the nine remaining Greater Manchester (GM) districts. Subsequent to this meeting, each district formally approved the establishment of a Joint Committee for the preparation of a joint Development Plan Document of the nine districts.

- 1.7 Section 28 of the Planning and Compulsory Purchase Act 2004 and Regulation 32 of the Town and Country Planning (Local Planning) (England) Regulations 2012 enable a joint plan to continue to progress in the event of one of the local authorities withdrawing, provided that the plan has ‘substantially the same effect’ on the remaining authorities as the original joint plan. The joint plan of the nine GM districts has been prepared on this basis.
- 1.8 In view of this, it follows that PfE should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore “the plan” and its proposals are in effect one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. Consequently, the Plan is proceeding directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.
- 1.9 Four consultations took place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and the initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016.
- 1.10 The fourth and most recent consultation on The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) took place in 2019. It received over 17,000 responses. The responses received informed the production of GMSF 2020. The withdrawal of Stockport Council in December 2020 prevented GMSF 2020 proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare PfE 2021.
- 1.11 Where a local planning authority withdraws from a joint plan and that plan continues to have substantially the same effect as the original joint plan on the remaining authorities, s28(7) of the Planning and Compulsory Purchase Act 2004 provides that any step taken in relation to the plan must be treated as a step taken by the remaining authorities for the purposes of the joint plan. On this basis, it is proposed to proceed directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.

- 1.12 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020. Given the basis on which the Plan has been prepared, this evidence base remains the fundamental basis for the PfE 2021 and has remained available on the GMCA's website since October 2020. That said, this evidence base has been reviewed and updated in the light of the change from GMSF 2020 to the PfE2021 and, where appropriate, addendum reports have been produced and should be read in conjunction with evidence base made available in October 2020. The evidence documents which have informed the plan are available via the GMCA's website.
- 1.13 PfE2021 and all supporting documents referred to within this topic paper can be found at (<https://www.greatermanchester-ca.gov.uk/placesforeveryone>).

2.0 Policy JP Allocation 13 Bottom Field Farm (Woodhouses) Overview

- 2.1 The site is located just to the south of in Woodhouses Village in Failsworth West ward. It is a brownfield site comprised of farm buildings.
- 2.2 The allocation has the potential deliver 30 homes, providing a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing. The location of the site, in a strong housing market, provides the potential for a range of high-quality housing in an attractive and accessible location, contributing to local housing need in the vicinity and across the borough.
- 2.3 In GMSF 2019 the Bottom Field Farm site was included within the Woodhouses Cluster strategic allocation (formerly GM-22). The Woodhouses Cluster strategic allocation was proposed to deliver around 260 homes across three sites (Land at the Trotting Track, Land North of Ashton Road and Land at Bottom Field Farm) within the Woodhouses area.
- 2.4 Since GMSF 2019 work has been carried out to address the issues raised in the consultation. Several alternative sites were also submitted during the GMSF 2019 consultation or to the council (see section 5 on site selection for further information). A site south of Cutler Hill Road was considered and subject to further assessment.

This site may therefore be referred to in evidence prepared to support GMSF 2020, including Locality Assessment for example. However, due to the findings of further evidence as noted below, this site was not taken forward for inclusion in GMSF 2020.

- 2.5 Since GMSF 2019, Oldham Council has also carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This includes findings from our emerging draft Mill Strategy, the council's recently completed Retail and Leisure Study and aspirations for increasing residential living in Oldham Town Centre as part of the council's Creating a Better Place agenda. This has allowed a reduction in the amount of Green Belt land required as sufficient housing land has been identified to deliver the vision, plan objectives and spatial strategy of PfE whilst maintaining a reasonable buffer.
- 2.6 In PfE 2021 the allocation relates to the site at Bottom Field Farm only. The site has therefore reduced from three parcels providing around 260 homes as proposed in GMSF 2019 to the Bottom Field Farm parcel proposed for around 30 homes in PfE 2021.
- 2.6 In GMSF 2019 the proposed Woodhouses Cluster strategic allocation was allocation number GM-22. In GMSF 2020 the allocation number was GM-13 and renamed to reflect the single site of Bottom Field Farm. In PfE 2021 the allocation number is Policy JP Allocation 13 and will be referred to as such within this topic paper.

3.0 Site Details

- 3.1 The site is currently designated as Green Belt and measures 0.98 hectares (ha) in size, with a developable area measuring 0.83ha. The site is a previously developed site in the Green Belt, occupied by farm buildings and an access road. It lies on the perimeter of Woodhouses village within is within the Failsworth East ward close to the border with Tameside.
- 3.2 The site is accessed via farm access off Hartshead Crescent which connects to Medlock Road running through Woodhouses. There is currently no formal road infrastructure within the site aside from access road.

- 3.3 The site is in single ownership and is part of a larger land ownership that extends southwards into the Green Belt towards Tameside.
- 3.4 Woodhouses Conservation Area is close to the site. Given the size of the site and the current land use, there is limited ecological value identified onsite, however there are areas of ecology to the south that will need to be considered as part of any future development of the site.
- 3.5 There is an area of surface water flood risk to the eastern boundary of the site which feeds into the River Medlock to the south of the site (at the borough boundary with Tameside).
- 3.6 The boundary has been reduced slightly since GMSF 2020 from to 0.98ha in PfE 2021. This is in part to remove an area of flood zone 3 but also to focus on the previously developed element only.
- 3.7 A map of the site as it appears in PfE 2021 is provided in Appendix 1.

4.0 Proposed Development

- 4.1 The site will deliver around 30 homes, providing a range of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs, including the delivery of high-quality family housing.
- 4.2 The assumed density of the proposed development is approximately 36 dwellings per hectare. The high-level indicative concept plan report (see section 26) suggests, based on a market appraisal for the local area and further consultation with house builders, that 'traditional' housing will come forward on 3, 4 and 5 bed semi and detached properties.
- 4.3 The type and range of housing, including affordable, will be delivered in line with local planning policy requirements contained in the current Local Plan (the Joint Core Strategy and Development Management Policies Development Plan Document, adopted November 2011):
- Policy 3 sets out the policy for the distribution and release of housing land;

- Policy 10 sets out the affordable housing policy, which now applies to all residential developments of 10 homes and above in line with National Planning Policy Framework (NPPF); and
- Policy 11 sets out that all residential developments must deliver a mix of appropriate housing types, sizes and tenures that meet the needs and demands of the borough's urban and rural communities based on local evidence.

- 4.4 With regards to 'local evidence' Oldham Council has recently completed a Local Housing Needs Assessment (LHNA) to inform the council's Housing Strategy and review of the Local Plan. The LHNA suggests a split of 30% affordable housing and 70% market housing. It identifies a need for three and four or more-bedroom houses given the pressures on larger family housing and a marked shift in aspirations for smaller flats and bungalows reflecting an ageing population and identified need for older persons' specialist accommodation. In terms of affordable housing provision, the LHNA suggests an affordable tenure split of 50% social affordable rented and 50% intermediate tenure. A broad housing mix of 16.7% one-bedroom, 48.7% two-bedroom, 29.6% three-bedroom and 5% four or more-bedroom dwellings is suggested.
- 4.5 The housing policies within the Local Plan will be reviewed as part of the emerging Local Plan Review.
- 4.6 Development will need to provide for appropriate access to and from the site in liaison with the local highway authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site.
- 4.7 Alongside the above development will be required to:
- Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation.

- Provide for new and/or the improvement of existing open space, sport and recreation facilities in line with local planning policy requirements and contribute towards additional school places, health and community facilities to meet the increased demand that will be placed on existing provision.
- Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications. Development should be in keeping with the local character of Woodhouses in terms of materials, design and landscaping.

4.8 The site boundary and full policy wording for Policy JP Allocation 13 in PfE 2021 can be found at Appendix 1.

4.9 A high-level indicative concept plan has been prepared by IBI, on behalf of the council to support the allocation and inform consultation. The high-level indicative concept plan can be found at Appendix 2. However, it is important to note that whilst the requirements set out in Policy JP Allocation 13 will need to be met, the concept plan may change with the preparation of more detailed masterplans and in conjunction with a future developer's planning application. Due to the size of the allocation Policy JP Allocation 13 does not specifically require the need for development to be in accordance with a comprehensive masterplan and design code for the site agreed by the local planning authority. However, the council will encourage any developer to consider and plan for the site as whole through the preparation of a masterplan as part of the planning application process.

4.10 The changes made to Policy JP Allocation 13 between GMSF 2019, GMSF Publication Plan: Draft for Approval (October 2020) and PfE 2021 are set out in Appendices 3 and 4.

4.11 The previous draft policy wording and boundary as proposed in GMSF 2019 can be found at Appendix 5 and as proposed in the GMSF Publication Plan: Draft for Approval October 2020 can be found at Appendix 6.

4.12 In terms of the changes between the 2020 GMSF and the 2021 PfE, as these changes were either minor or as a result of Stockport's withdrawal from the plan, it is

concluded that the effect of the plan is substantially the same on the districts as the 2020 version of the policy.

5.0 Site Selection

- 5.1 To identify potential development sites for allocation a Site Selection methodology was developed to inform preparation of GMSF / PfE. The methodology includes four stages and seven site selection criteria, informed by the Vision, Objectives and Spatial Strategy in the GMSF 2019.
- 5.2 Full details of the site selection process and sites considered can be found in the Site Selection Background Paper.
- 5.3 A Call for Sites exercise to identify available land was launched across Greater Manchester in 2015 to inform the first draft GMSF in 2016. Call for Sites were also submitted in response to the first GMSF consultation in 2016/17. Several sites falling within the Woodhouses area were submitted as part of the Call for Sites and/or to Oldham Council. Details of these sites, which included Bottom Field Farm as part of a larger site to the south of Woodhouses, can be found in the Site Selection Background Paper and in Appendix 7 to this topic paper, where there is also a justification as to why they were not considered suitable for allocation.
- 5.3 Areas of Search were identified where any identified site including the Call for Sites and proposed allocations within the GMSF 2016, met one or more of the Site Selection Criteria. They were identified using the Site Selection Criteria Maps produced for each borough of Greater Manchester. Bottom Field Farm falls within the Area of Search OL-AS-8.
- 5.4 The site selection paper identifies that OL-AS-8 meets the site selection criteria of:
- **Criterion 5** – Land which would have a direct significant impact on delivering regeneration;
 - **Criterion 7** – Land that would deliver significant local benefits by addressing a major local problem / issue.
- 5.5 Criterion 5 links to those areas which have a direct link to areas of high deprivation and therefore have the potential to deliver regenerative improvements. Areas of high

deprivation were identified using the 10% most deprived Lower Super Output Areas (LSOAs) in the Index of Multiple Deprivation (IMD) for England 2015 and any potential site which was within or directly adjacent to these areas was considered against this criterion. It is considered that the site at Bottom Field Farm will have regenerative benefits through diversifying the housing stock, including the provision of affordable housing and contributing towards local housing need.

- 5.6 Criterion 7 links to sites which can demonstrate direct link(s) to addressing a specific local need. It is considered that Bottom Field Farm meets criterion 7 as it will help to diversity the existing housing stock, enhance the housing mix in the area, through adding to the type and range of housing available including provision of affordable housing and address local housing need and contribute to boosting the competitiveness of the north.
- 5.7 In addition to the above, Bottom Field Farm is previously developed land in the Green Belt, as such it is also considered that it would meet Criterion 1 – Land which has been previously developed and / or land which is well served by public transport.
- 5.8 As stated above, the Call for Site which the allocation falls within was much larger than Bottom Field Farm. The larger Call for Site was not considered suitable in its entirety due to its impact on the Green Belt to the south of Woodhouses and that it could lead to over-development.
- 5.9 Following their identification, the sites within the Areas of Search were subject to a planning constraints assessment, which included an assessment of flood risk, ecology, landscape, heritage and social infrastructure etc. See the Site Selection Background Paper for further details regarding the Call for Site Assessment.
- 5.10 In terms of the PfE Spatial Strategy and Strategic Objectives, Bottom Field Farm (Woodhouses) is capable of delivering around 30 houses, with a mix of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs. As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within the boroughs of Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.

5.11 In relation to the strategic objectives the site meets the following:

- Strategic Objective 1 – Meet Local Housing Need.

5.12 For more information on the site selection process go to the Site Selection Background Paper.

6.0 Planning History

6.1 There are no relevant planning applications to the site.

Details of the baseline housing land supply sites are available within the PfE 2021 Supporting Evidence – Housing Land Supply document.

7.0 GMSF 2019 Consultation Responses

7.1 A summary of the 2019 consultation response to Woodhouses Cluster is set out below. Further details can be found in the Statement of Consultation.

7.2 The comments summarised within this section relate to the Woodhouses Cluster as it appeared in the GMSF 2019, where Bottom Field Farm was included with two other sites, proposed for around 260 homes in total across the three sites.

7.3 A total of 576 comments from organisations and members of the public were received during the GMSF 2019 consultation in relation to the proposed Woodhouses Cluster strategic allocation. The main issues were in relation to the scale of development proposed and that it would result in the over development of Woodhouses village and highways matters.

7.4 With regards to highways it was generally felt that Medlock Road is unsuitable for such an increase in numbers and all potential access points would destroy even more green belt. It was also felt that public transport in the area is also terrible and not considered to meet National Planning Policy Framework requirement or the site selection criteria.

7.5 There were concerns over the heritage of the area and the impact of the scale of the development on Woodhouses Conservation Area and contravene the Listed Building

and Conservation Area Act 1990. It is suggested that a Heritage Impact Assessment should be carried out.

7.6 The loss of ecology was also a major objection to the development particularly in relation to the impact on Sites of Biological Importance and BAP species.

7.7 It was also suggested that a flood risk assessment should be carried out.

7.8 Respondents commented that the proposed homes in this allocation were not seen as being affordable for many residents within this area and that it is difficult to see how affordable housing will be provided. There was also concern about the loss of value on existing homes as this is considered to be a premium area and proposed development will devalue existing properties.

8.0 GMSF 2019 Integrated Assessment

8.1 The GMCA commissioned ARUP to complete an Integrated Assessment (IA) of the first and second draft of the GMSF and PfE 2021.

8.2 The IA is a key component of the evidence base, ensuring that sustainability, environmental quality and health issues are addressed during its preparation. The Integrated Assessment combines the requirements and processes of:

- **Sustainability Appraisal (SA):** mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004.
- **Strategic Environmental Assessment (SEA):** mandatory under the Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose the European Directive 2001/42/EC into English law).
- **Equality Impact Assessment (EqIA):** required to be undertaken for plans, policies and strategies by the Equality Act 2010.
- **Health Impact Assessment (HIA):** there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.

8.3 The IA carries out an assessment of the draft policies by testing the potential impacts and consideration of alternatives against the plans objectives and policies. This ensures that any potential impacts on the aim of achieving sustainable development

considered and that adequate mitigation and monitoring mechanisms are implemented. It does this through an iterative assessment, which reviews the draft policies and the discrete site allocations against the IA framework.

8.4 Stakeholder consultation is a significant part of the IA. Comments have been sought on, and informed the preparation of, previous iterations of the IA as part of developing GMSF and PfE 2021. A summary of the 2019 consultation feedback relevant to the 2020 IA and response to those comments is included in Appendix A of the 2020 IA report.

8.5 As well as the thematic policies, each allocation policy was assessed against the IA framework. To determine levels of effect when scoring the policies against the strategic objectives of the plan IA framework, the following assessment key is used:

Table One: IA Scoring

++	Very positive effect
+	Positive effect
?	Uncertain
-	Negative effect
--	Very negative effect
O	Neutral/ no effect

8.5 Combined symbols are sometimes used in the assessment (e.g. '+/ ?' or '- / ?'). Where this occurs, it is because there is a strong likelihood of positive/negative effects but that there is insufficient information to achieve certainty at this stage. Alternatively, there may be a combination of positive or negative effects, depending on how the option under consideration is eventually delivered.

8.6 The key outcomes of the 2019 IA on the Woodhouses Cluster allocation policy in GMSF 2019 have been considered to inform the production of the revised Policy JP Allocation 13. This has been reassessed in the 2020 IA. Appendix D of the 2020 IA provides the assessment tables for each allocation policy. It includes the assessment

from 2019 including mitigation proposed, commentary on changes since 2019 and how this responds to the recommendations. Finally, it details any residual recommendations.

- 8.7 It is important to note that the IA was focusing on each policy in isolation from other policies in the Plan and that many of the recommended changes for the allocation policy are already covered in other policies in the Plan. However, some changes have been made to the allocation policy as a result of the 2019 IA and the policy has been reassessed in the 2020 IA.
- 8.8 Further details can be found in the 2020 Integrated Appraisal Report and 2020 Integrated Appraisal Addendum Report.

9.0 **GMSF 2020 Integrated Assessment**

- 9.1 The IA showed that Bottom Field Farm (Woodhouses) generally performed positively against the strategic objectives of the plan. In particular, the allocation was scored as having a very positive effect in relation to Objective 9 'Promote sustainable modes of transport' and Objective 16 'Conserve and/or enhance landscape, townscape, heritage assets and their setting and the character of GM'.
- 9.2 The allocation scored as having a negative / positive effect against Objective 10 'Improve air quality' as the site is adjacent an Air Quality Management Area (AQMA) but the policy encourages active transport provision. It scored negative / neutral against Objective 13 'Reduce the risk of flooding to people and property' as the IA states the site has average to high flood risk vulnerability but notes the policy requests a FRA and drainage strategy. Objective 17 'Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of GM, whilst reducing land contamination' scored negative as the previously developed Bottom Field Farm site was included within the Woodhouses Cluster which also included greenfield sites. As the allocation is now only proposed for the Bottom Field Farm site, which is previously developed land, it is considered that this criterion could be met. Furthermore, the IA concluded that when the framework is read as a whole, no further recommendations are made.

- 9.3 Further details can be found in the 2020 Integrated Appraisal Report and 2020 Integrated Appraisal Addendum Report.
- 9.4 A 2021 PfE Integrated Appraisal Addendum has been produced and has reviewed the changes made between GMSF 2020 and PfE 2021. As there have been no substantial changes to this specific allocation between GMSF 2020 and PfE 2021 and the 2020 IA recommendations which had been incorporated into the GMSF 2020 remain in the PfE Policy, there has been no change to the assessment of this Policy in relation to the IA Framework since 2020.

Section B – Physical

10.0 Transport

- 10.1 TfGM commissioned Systra to ARUP to complete locality assessments of each of the allocations proposed in GMSF 2019 as part of the evidence base developed in order to assess and evaluate the impact of the proposals on the transport network. These locality assessments forecast the likely level and distribution of traffic generated by each allocation and assess its impact on the transport network. Where that impact is considered significant, possible schemes to mitigate that impact have been developed, tested and costed where appropriate.
- 10.2 It is important to note that the mitigation schemes developed are intended to demonstrate only that significant transport impacts of the allocation can be appropriately ameliorated. As such they are indicative only and are not intended to act as definitive proposal for the mitigation of any allocation. Detailed proposals would need to be developed as part of a Transport Assessment submitted as part of a planning application at a later date.
- 10.3 These Locality Assessments have been prepared within the context of the Greater Manchester Transport Strategy 2040, Five-Year Transport Delivery Plan and district's Local Implementation Plans. Within these Oldham Council and TfGM have planned improvements across Oldham which are intended to make it easier for people to travel sustainably. This includes elements of the Bee Network, a comprehensive cycling and walking network which covers all Districts within Greater Manchester. The overall delivery plan of strategic transport interventions that will support all allocations in Oldham and details of the Bee Network in Oldham can be found in the Greater Manchester Transport Strategy 2040 and Five-Year Transport Delivery Plan.

GMSF 2020 Locality Assessment Findings

- 10.4 Locality Assessments of the GM strategic allocations have been carried out by SYSTRA to inform development of the Joint DPD following GMSF 2019. As such the assessment summary below is based on the allocation as proposed in GMSF 2020. The Locality Assessment (November 2020) was prepared prior to the reduction of the Woodhouses Cluster allocation to only include Bottom Field Farm. As such the

assessment is based on a development quantum of 130 homes, split across two land parcels. The Locality Assessment acknowledges that it is likely that the development of Bottom Field Farm only will materially affect the scope of the junction mitigations proposed, and it is likely that the Bottom Field Farm site has the potential to be delivered without the junction improvements proposed, as such these have been removed from the final list of necessary interventions within the Locality Assessment. This will need to be verified at planning application stage through the production of a Transport Assessment.

- 10.5 An updated locality assessment has since been prepared to reflect the changes to the allocation proposed in PfE 2021 and details of this are summarised at the end of this section.
- 10.6 Details regarding the process for preparing the Locality Assessments can be found in the Transport Locality Assessments – Introductory Note and Assessments - Oldham. To ensure a consistent basis for assessing traffic impacts, all sites have been assessed using traffic forecasts from the GM strategic modelling suite.
- 10.7 The locality assessments provide an insight into the combined impacts of all the proposed strategic allocations and site-specific impacts, including:
- Cumulative traffic impact(s) of the site on the transport network;
 - Testing the effectiveness of the proposed off-site local highway network mitigation measures; and
 - Providing outline costs for essential transport interventions and mitigation measures.
- 10.8 The completion of locality assessments on the proposed strategic allocations has ensured that each site has been subject to a thorough, robust and consistent evaluation of its likely contribution to transport impacts in Greater Manchester. Sites that have been selected for inclusion in the Joint DPD have been found to be suitable from a transport perspective and satisfy the requirements of NPPF in that they do not place an unacceptable impact on highway safety or severe impact on the road network. As stated above where necessary, illustrative mitigation schemes have been developed, and their effectiveness in reducing traffic impacts has been demonstrated. Those schemes which have a strategic benefit and are likely to be

needed in the next five-year period have been referenced in Our Five-Year Transport Delivery Plan and form part of the Greater Manchester Improvement Plan (GMIP).

- 10.9 For some allocations it is recognised that there is further work to be done in order to develop a solution that fully mitigates the site's impact on the transport network. In these instances care has been taken to ensure that the allocation is not identified for delivery in the first five years of the Plan, to enable more work to be undertaken to ensure that the site can be delivered in a safe and sustainable manner at a later point in time. All phasing information contained in the locality assessment is indicative only and has only been used to understand the likely intervention delivery timetable.

Access Arrangements

- 10.10 The site access arrangement has been developed to illustrate that there is a practical option for site access in this location and to develop indicative cost estimations. It is assumed that a detailed design consistent with Greater Manchester's best practice Streets for All highway design principles will be required at the more detailed planning application stage.
- 10.11 The Bottom Field Farm site is located adjacent to Hartshead Crescent. Hartshead Crescent is a residential street with footpaths, full street lighting and a 20mph speed limit. This road also presents carriageway width restrictions and on-street parking. The road continues directly into the proposed allocation where it forms a direct access to the existing farm buildings.
- 10.12 For the purposes of this assessment the access point identified as part of the high-level indicative concept plan has been assessed. It is proposed that the Hartshead Crescent access will comprise modification to the existing three-arm priority junction to make it suitable for development traffic. The Locality Assessment also recommends, in order to allow for safe right-turn movements across oncoming traffic into the site, that the site access is given priority, and that traffic approaching on Hartshead Crescent to the east gives way.
- 10.13 Details of the suggested access arrangements for the allocation can be found in the Transport Locality Assessments – Introductory Note and Assessment – Oldham.

Multi-modal accessibility

- 10.14 Accessibility is measured using Greater Manchester Accessibility Levels (GMAL). GMAL is a detailed and accurate measure of the accessibility of a point to both the conventional public transport network (i.e. bus, Metrolink and rail) and Greater Manchester's Local Link (flexible transport service), taking into account walk access time and service availability. The accessibility index score is categorised into eight levels, 1 to 8, where level 8 represents a high level of accessibility and level 1 a low level of accessibility.
- 10.15 The current accessibility of the Woodhouses Cluster site using Greater Manchester's Accessibility Level model (GMAL) has been identified as comprising areas of level 2 and 3 for accessibility.
- 10.16 The Locality Assessment concludes that the main destinations likely to generate walking and cycling trips are the local shops at Failsworth (2km), Co-op Academy Failsworth (1.1km), Holy Family RC Primary School (1.4km), Limehurst Primary School (1.6km), and Higher Failsworth Primary School (1.6km).
- 10.17 While the Cutler Hill Road and Failsworth Road provide standard width footpaths connecting both the northern and southern sites to Failsworth and the wider Oldham area, these are only provided on one side of the carriageway. Furthermore, while full lighting is present on these main pedestrian and cycle routes, there are no dedicated crossing facilities, and no dedicated facilities for cyclists. Localised improvements may therefore be required in the vicinity of the new access
- 10.18 National Cycle Route 626 (NCN626) runs 3km east of the site, linking Oldham with Ashton-under-Lyne via Park Bridge Road. While this offers an attractive route away from traffic, it cannot be easily accessed from the Woodhouses Cluster allocations as no dedicated cycle paths or bridleways connect the two.
- 10.19 There is an existing Public Right of Way (PROW) that runs north from Cutler Hill Lane between Stockburn Drive and Glenmore Drive which provides an off-road walking and cycling route towards central Oldham. There are also several PROWs that run west from Failsworth Road to Waterfield Way and Leicester Road, as well as south from Hartshead Crescent and Ashton Road which provide dedicated

pedestrian crossings of the M60 while also providing access towards Taunton and Ashton under- Lyne.

10.20 While the southern parcel (Bottom Field Farm) does not sit on any section of the proposed Bee Network, one part of the Bee Network passes immediately west of the northern parcel between Oldham and Failsworth and could be easily integrated into this site. Notwithstanding this, the design of the internal pedestrian/cycle access should reflect the standards being implemented by the Bee Network in order to suitably accommodate both pedestrian and cycle users. These walking and cycling routes could also be integrated into the possible spine road passing through the site from east to west.

10.21 In terms of access to bus services there are local bus stops situated in the centre of Woodhouses and southeast Failsworth which are all within a walkable distance of both land parcels. For the southern parcel (Bottom Field Farm), this is served by routes operated by Stagecoach and Stotts Coaches, which include the following:

- Route 74: Piccadilly Gardens to Woodhouses (average frequency: 30 minutes, only operates during morning peak)
- Route 159: Oldham to Middleton (average frequency: 60 minutes).

10.22 There are more frequent services and routes within the eastern suburbs of Failsworth. Generally, bus services operate to the centre of Woodhouses village at infrequent or inconsistent intervals, while more frequent services operate to the northwest of the proposed allocation in the suburbs of Failsworth. The nearest heavy rail station and Metrolink stop can be found at Moston and Failsworth, respectively, and travel south to Manchester city centre and north to Rochdale.

10.23 Reflecting the above the Locality Assessment recommends:

- A permeable network for pedestrian and cyclist priority within the development is required including sufficient secure cycle parking for all dwellings.
- That the internal walking and cycle network should be linked to high quality routes connecting through to these areas, including the proposed Bee Network. Existing PRoWs that either pass near or cross the proposed site should be positively upgraded, with both PRoWs and the internal pedestrian/cycle network of the site being constructed to the standards set out by the Bee Network.
- That the northern parcel should be integrated into the Bee Network in order to

allow for improved cycle and pedestrian routes into the centre of Oldham. A new pedestrian crossing facility, provisionally identified to be formed of a Zebra crossing is identified to be necessary at Cutler Hill Road to accommodate pedestrian movements.

10.24 With regards to public transport the Locality Assessment identifies the Woodhouses Cluster allocation as potentially benefiting from increased bus services on the routes serving the village, specifically the 74, which could possibly be expanded to run through the day via Woodhouses, or via a potential new service that could operate a dedicated service via Woodhouses. Such an increase in frequency could be funded in-part through contributions arising from development order to help secure the delivery of this allocation.

10.25 With regards to parking Systra conclude that it is not necessary to consider in detail the parking standards for residential units relevant to the site at this stage of assessment as there are no particular constraints on achieving likely minimum parking standards that may be in application at the time the site is brought forward. Accommodation of Electric Vehicle (EV) parking, while an important factor in developing more efficient transport connections for the allocation, should be considered at the detailed design stage, potentially as an integration of specific house design.

10.26 A broad assumption has been made that a maximum of 2 spaces per dwelling is likely to be proportionate however other alternative local policy requirements are likely to be equally deliverable and can be considered at the planning application stage.

Impact on the Local Highway Network and Strategic Road Network

10.27 While in isolation the Bottom Field Farm (Woodhouses) allocation would be unlikely to present significant implications on the surrounding road network, its potential cumulative impact with the Land South of Coal Pit Lane (Ashton Road) allocation by 2040 resulted in a mitigation scheme being considered at one of the junctions likely to see material impacts as a result of traffic introduced by the proposed strategic allocations (Coal Pit Lane and Cutler Hill Road).

- 10.28 With regards to understanding the impact of the strategic allocation on the local highway network a 'with GMSF' scenario has been assessed against a Reference Case which assumes background growth and includes the housing and employment commitments from the districts. Through discussions with TfGM and the Combined Authority, it has been agreed that where mitigation is required, it should mitigate the impacts back to a reference case scenario. It should be noted that mitigating back to this level of impact may not mean that the junction operates within capacity.
- 10.29 In order to understand whether the mitigation developed for the site is sufficient to mitigate the worst-case impacts of the proposed strategic allocations, a second run of the GMVDM with all identified mitigation included, was undertaken. Where a significant flow change was observed the junction models were rerun to check that the suggested mitigation by the Locality Assessment is still sufficient to mitigate site impacts and that all other in scope junctions continue to operate satisfactorily in light of any reassignment due to mitigation schemes.
- 10.30 The cumulative impact of the allocations on the Strategic Road Network (SRN) has also been considered. Given the size of the allocation at Bottom Field Farm the impact of the development traffic on the SRN is still considered unlikely. Based on the proposed build out of the site, and its distance from the nearest section of the SRN (M60 Junction 22), the Woodhouses Cluster allocation has been considered unlikely to present traffic implications requiring the introduction of mitigation on the SRN.
- 10.31 The final list of interventions considered necessary to support the Woodhouses Cluster and mitigate the cumulative impacts of the allocation are set out in Table Two below. These are categorised as follows:
- **Allocation Access**
 - **Necessary Strategic Interventions** - interventions with strategic implications for which the development will be expected to contribute or pay for, and which have to come forward in order for the development to be allocated;
 - **Necessary Local Mitigations** - includes measures such as improvements to off-site junction and public transport facilities which will be necessary for the development to be allocated.
 - **Supporting Strategic Interventions** - interventions with strategic impacts to which development would be expected to make a contribution where possible to

enhance the connectivity of the site – these costs are not included in the viability calculations – this includes measures such as Metrolink extensions and some motorway interventions.

10.32 The changes made to the allocation, to only include Bottom Field Farm, have meant that some local mitigation measures identified have been discounted (as shown in Table Two below). The Locality Assessment concludes that it is likely that these changes will materially affect the scope of the junction mitigations proposed, as such these have been removed from the final list of necessary interventions. This will need to be verified at planning application stage through the production of a Transport Assessment.

Table Two – Final list of interventions to support Policy JP Allocation 13

Mitigation	Description
<i>Allocation Access</i>	<i>Allocation Access</i>
Cutler Hill Road Junction	Priority junction assumed
Hartshead Crescent Junction	Priority junction assumed
<i>Necessary Strategic Interventions</i>	<i>Necessary Strategic Interventions</i>
None identified	
<i>Necessary local mitigations</i>	<i>Necessary local mitigations</i>
Permeable network for pedestrian and cyclist priority within the development	Assumed full permeability of cycle and pedestrian access, as well as direct connections to PRowS either bounding or near the development and improvement of walking/cycling facilities on Cutler Hill Road. All pedestrian and cycle networks internal to the site, as well as connecting PRowS, should be built or upgraded to the standards outlined in the Bee Network, as well as providing connections to the nearest section of the Bee Network.
Minor Traffic Management Improvements	Minor Traffic Management Improvements to address local highways concerns.

Mitigation	Description
<i>Discounted Local Mitigations</i>	<i>Discounted Local Mitigations</i>
Improvement to Cutler Hill Road / Coal Pit Lane junction	An indicative scheme was developed as a potential improvement scheme at this location. This has been discounted as it is no longer necessary local mitigation
Improvement of Failsworth Road / Westminster Road (double-mini roundabout)	An indicative scheme was developed as a potential improvement scheme at this location, discounted due to highway safety concerns, lack of space for viable alternative and significantly significant amendment to allocation (quantum reduction and removal of northern land parcel).

10.33 Please note that the necessary local mitigation measures identified are purely a highway infrastructural intervention prepared to illustrate that options may be available at this location – further detailed consideration would be required at the time of a planning application to ensure development of an option suitable for all users including pedestrians, cyclists and bus users.

10.34 In relation to the necessary local mitigations these are as follows:

- Permeable network for pedestrian and cyclist priority within the development** - In order to promote and encourage sustainable transport modes, as well as providing safe and efficient accessibility for non-vehicular traffic, the development is to both provide ease of access for pedestrian and cyclist traffic into and out of the site, as well as connecting and improving PRoW that either directly connect or pass near the proposed site. This is to include upgrading of the local PRoW routes to meet the standards of the proposed Bee Network and, wherever possible, connect directly to sections of the Bee Network. Furthermore, pedestrian and cycle facilities in the areas surrounding the Woodhouses Cluster allocation should be improved wherever possible in order to allow for safe accessibility by non-vehicular users to both all parts of the development, but also the adjacent residential, employment and retail areas.

Phasing of Mitigation

10.35 Expected phasing of the allocation, based on the concept planning work carried out by IBI, has been provided to inform the modelling. The indicative intervention delivery timetable for the mitigation measures set out above are as set out Table Three. Due to the changes made to the Woodhouses Cluster to only include Bottom Field Farm the proposed access at Cutler Hill Road is no longer needed.

Table Three: Mitigation Measures – Indicative Intervention Delivery Timetable

MITIGATION	2020-2025	2025-2030	2030-2038
Site Access			
Cutler Hill Road Access Junction		✓	
Hartshead Crescent Access Junction	✓		
Necessary Local Mitigations			
Permeable network for pedestrian and cyclist priority within the development	✓		
Minor Traffic Management Improvements	✓		

Summary

10.36 The Woodhouses Cluster allocation assessed through Locality Assessment initially consisted of two land parcels. Following the final round of modelling outputs, the decision was made to significantly reduce quantum at Woodhouse Cluster, reducing the total allocation to one site (Bottom Field Farm) and 30 dwellings.

10.37 Assessments undertaken have considered the potential impact of the original scale of development proposed on the surrounding road network, both in isolation and in cumulative impact with other allocations.

10.38 In response to potential concerns regarding congestion at key junctions, mitigation schemes were considered at both the Failsworth Road / Westminster Road (double-mini roundabout) (Mitigation Option 1) and the Cutler Hill Road / Coal Pit Lane junction (Mitigation Option 2). These have been tested and illustrate significant improvements to traffic flows only across these junctions, both with and without the

cumulative impact of the allocations. However, neither of these schemes are considered necessary for the revised allocation of 30 dwellings now proposed at Bottom Field Farm.

10.39 Based on the information contained within the Locality Assessment it is concluded that the traffic impacts of the site are less than severe, and even for the previous scale of development the impacts were likely to be successfully mitigated.

10.40 In summary, the assessment has provided an initial indication that the allocation is deliverable and to inform viability, and that further detailed work will be necessary. As the allocation moves through the planning process, to identify the specific interventions required to ensure the network works effectively based on transport network conditions at the time of the planning application.

Locality Assessment Update Report (2021)

10.41 Since preparation of the 2020 Locality Assessment's a number of factors have necessitated a review of their conclusions and the revision or confirmations to the findings as appropriate. Those factors include:

- The removal of some Allocations from the Plan;
- Changes to the quantum of development proposed within some Allocations;
- Changes to the scale or type of transport supply (also known as transport mitigation schemes or interventions) proposed close to or within some Allocations;
- The withdrawal of Stockport Council and their associated Allocations from the Greater Manchester Spatial Framework; and,
- Modifications to the reference transport network to include newly committed schemes on the strategic road network (SRN).

10.42 These are factors which, when taken together, may alter the pattern of traffic movements close to the remaining Allocations and impact on wider traffic movements across the conurbation. As such, it was considered necessary to check that the conclusions of the original assessments remain robust. The Oldham Locality Assessment Update Report (2021) sets out the processes behind, and conclusions of, the review for Oldham. This note identifies whether any of these changes are

likely to significantly impact on the conclusions of the original assessments. Where needed it sets out an updated technical assessment of the impact of the Allocations in Oldham on the operation of the transport network and reviews and revises the transport infrastructure necessary to mitigate the impacts of the allocations.

10.43 The largest change to demand since the publication of the locality assessments has been the removal of the Stockport allocations from the plan. In consideration of Oldham District's allocations in relation to Stockport District, Systra concluded that the distance between the two districts means it is unlikely to result in significant impacts upon the measured assumptions observed in the previous Locality Assessment study.

10.44 The main changes to be considered were therefore in relation to:

- The removal of allocations at GMA21 – Thornham Old Road, GMA17 Hanging Chadder and GMA20 Spinners Way between the fourth and fifth round of modelling; and
- Revisions to the allocations that have been made between the fourth and fifth round of modelling, particularly in relation to capacity and phasing.

10.45 Based on the removal of three allocation sites from Oldham (GMA21 – Thornham Old Road, GMA17 Hanging Chadder and GMA20 Spinners Way), as well as a general reduction in development quantum for those allocations remaining within the latest Locality Assessment Update Report (2021), it is considered unlikely that there will be significant changes or increased implications on both the local and strategic road networks within the district due to PfE related traffic.

10.46 Notwithstanding this, it is possible that between the fourth and fifth round of modelling, junctions could potentially see increases in traffic due to background growth, changes in the assignment of traffic or the increased quantum of allocations outside the Oldham district which could have cumulative effects at specific locations.

10.47 For the purposes of testing the impact of Bottom Field Farm (Woodhouses) through the strategic model, a total of 30 residential units has been assumed to be built out by 2040. Based on the indicative concept plan provided as part of the previous Locality Assessment the access arrangements for the allocation comprise access onto Hartshead Crescent to be delivered by 2040.

10.48 The changes to the quantum of development set out above does not affect need for the active mode interventions previously proposed. It should be noted that, since the publication of the Locality Assessments, an Active Travel Design Guide has been published by GMCA and TfGM. This Design Guide identifies design principles for the Bee Network that should be followed, and encompasses aspects such as segregated and shared infrastructure, crossing facilities and junction design. Any active mode interventions that are implemented in support of this allocation should follow this Design Guide. With a significant decrease in the ultimate quantum of development, no additional forms of intervention are considered necessary to support the allocation.

10.49 In response to the above Policy JP Allocation 13 sets out that development of the site is required to:

- Provide for appropriate access to and from the site in liaison with the local highway authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site; and
- Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation.

11.0 Flood Risk and Drainage

11.1 A Level 1 Strategic Flood Risk Assessment (SFRA) has been carried out for Bottom Field Farm and the allocation's flood risk was mapped. In terms of fluvial flood risk, the site is not within Flood Zones 2 or 3.

11.2 In terms of surface water flood risk there is a small area of high surface water flood risk (1 in 30-year flood event) to the south-east of the allocation boundary; a larger

extent of medium and low surface water flood risk (1 in 100-year and 1 in 1000-year flood event) running south-westerly along the eastern site boundary.

- 11.3 The Level 1 SFRA recommends that the site requires an FRA. The site should consider the site layout and design around the identified flood risk as part of a detailed FRA or drainage strategy.
- 11.4 Bottom Field Farm was also scoped for further broadscale fluvial modelling to cover existing gaps in the baseline information. The site boundary of Bottom Field farm was amended to ensure that it did not include Flood Zone 3 as a consequence of this further work. Therefore, the site is effectively in Flood Zone 1 and passes the flood risk sequential test
- 11.5 The Level 1 SFRA, using Environment Agency datasets and River's Trust Irwell Catchment datasets, provides a high-level indication of where natural processes, through green infrastructure, could be used for future flood storage functions to support Natural Flood Management.
- 11.6 The allocation was found to have small areas for runoff attenuation features such as natural depressions or small channels where river improvement or bunds can be created for natural surface water storage. There is also the opportunity for wider catchment tree planting which will provide higher levels of infiltration and reduced overland flows. There is also the opportunity to use riparian tree planting.
- 11.7 In terms of Irwell Catchment Opportunities for natural processes to support Natural Flood Management, the site has the opportunity to enhance urban losses. This includes improving soil moisture storage capacity, which can be done through increased green space cover, making the landscape more permeable which will reduce run off rates. The site also has the opportunity to support runoff Attenuation Features (RAFs) as an area identified for extra storage opportunities. Features can include natural depressions and small channels between 100-5,000 m² which can be created through river improvement or bunds. These features tend to reduce peak runoff if they are designed carefully to fill at high flows and drain away between events.

- 11.8 Such opportunities, as outlined above, should be explored further as part of masterplanning, site specific flood risk assessments and drainage strategies.
- 11.9 In response to the above Policy JP Allocation 13 sets out that development of the allocation should be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.

12.0 Ground Conditions

- 12.1 The high-level indicative concept planning report states that there are no known issues with ground conditions, however Phase 1 and 2 site investigation reports would be required at planning application stage to identify the extent of contamination (if any) and to establish appropriate remediation measures.

13.0 Utilities

- 13.1 The high-level indicative concept planning report has identified that there is a network of pipes around the edges of the site connecting to the existing urban settlements. Initial assessments highlight a gas pipeline and potential easement running along the edge of the site. The exact requirement for an easement along the gas pipeline and its potential use for landscaping/ infrastructure is subject to detailed discussion with relevant authorities.
- 13.2 The high-level indicative concept planning report suggests that the easements could provide an opportunity to create a natural green buffer between the development and a newly defined boundary of the green belt. Also, the extensive existing network surrounding the site presents the opportunity to extend this existing network to serve future development.

- 13.3 In response to the above Policy JP Allocation 13 requires development of the site to be informed by a comprehensive drainage strategy, which includes a full investigation of the surface water hierarchy.
- 13.5 Policy JP-D1 Infrastructure Implementation also seeks to ensure that development does not lead to capacity or reliability problems in the surrounding area by requiring applicants to demonstrate that there will be adequate utility infrastructure capacity, from first occupation until development completion.

Section C – Environmental

14.0 Green Belt Assessment

- 14.1 The site is currently designated as Green Belt in its entirety and is proposed to be released from the Green Belt through PfE. The site is currently identified as previously developed (brownfield) land in the Green Belt.
- 14.2 The land surrounding the proposed allocation boundary will remain designated as Green Belt, therefore it is important that the site is developed sensitively along the Green Belt boundary, incorporating high-quality landscaping and green infrastructure, and enhancing linkages with the neighbouring communities and countryside. A PRoW extends along the farm access off Hartshead Crescent south-east into the Medlock Valley.

Green Belt Exceptional Circumstances

- 14.4 Paragraph 136 of the NPPF requires that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and fully justified. The Green Belt Background Paper, available on the GMCA website, sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations within the plan. The exceptional circumstances take the form of the strategic level case – high level factors that have influenced and framed the decision to alter boundaries, such as meeting housing need; and local level case – specific factors relevant to the proposed releases that complement the strategic case.
- 14.5 As outlined in section 4, the site selection process has identified the most sustainable locations by assessing potential sites against the site selection criteria (see Appendix 4) to ensure the proposed allocations meet the spatial objectives of the plan. In terms of the local-level case, the exceptional circumstances for the release of the Bottom Field Farm allocation from the Green Belt is that:
- The site meets Criterion 5 of the Site Selection criteria, as the site provides an opportunity to deliver high-quality homes on previously developed land whilst making a positive contribution to boosting the competitiveness of the north of Greater Manchester; and

- The site meets Criterion 7 of the Site Selection criteria, as the site provides an opportunity to deliver high-quality family housing, including affordable housing, to diversify the local housing stock and contribute towards meeting local needs.

14.6 The local-level case for exceptional circumstances, set out in the Green Belt Background Paper, includes a summary of the Green Belt Harm and mitigation assessment in relation to Bottom Field Farm. The findings from this assessment are summarised in the section below (for information a summary of the Green Belt Stage 1 2016 study is also set out).

The Greater Manchester Green Belt assessment (2016)

14.7 The Stage 1 Green Belt assessment assessed the whole of the Green Belt in Greater Manchester, providing a comprehensive analysis of variations in contribution of land to the Green Belt purposes as set out in the NPPF.

14.8 The Bottom Field Farm or former Woodhouses Cluster strategic allocations were not identified in the 2016 Draft GMSF. However, the assessment identified and assessed the Green Belt parcel, which the Bottom Field Farm allocation is now located within, as Green Belt parcel OH48.

14.9 The parcel was described as comprising a single farmstead surrounded by a number of pasture and arable fields with woodland dominating the sloping land up from the River Medlock, which passes through the parcel near to the canal.

14.10 Green Belt parcel OH48 was scored as ‘Strong’ in relation to three out of the four purposes of the Green Belt assessed (purpose 5 was not part of the assessment). The full scoring is set out in Table Four below:

Table Four: Strategic Green Belt Area Assessment

Parcel Reference	Purpose 1a Rating	Purpose 1b Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Strategic Green Belt Area
OH48	Strong	Moderate	Strong	Strong	Moderate	17

14.11 Of the Strategic Green Belt parcel that was assessed in 2016, only 0.98ha is now proposed for Green Belt release as the Bottom Field Farm allocation.

Greater Manchester Green Belt Study – Assessment of Proposed 2019 GMSF Allocations and Cumulative Assessment of Proposed 2020 GMSF Allocations

- 14.12 The Stage 2 Green Belt study assessed the potential impact on the Green Belt that could result from release of land within the development allocations proposed in the 2019 Draft GMSF. Its intention was to inform the finalisation of the proposed strategic allocations.
- 14.13 The assessment was based on the Woodhouses Cluster Strategic Allocation as proposed in the 2019 Draft GMSF, which comprised three parcels including Bottom Field Farm. The assessment split the Woodhouses Cluster into four sub-areas to reflect variations in harm to the Green Belt purposes. Bottom Field Farm was identified as sub-area GM22-4.
- 14.14 The assessment found that overall GM22-4 makes a relatively limited contribution to checking the unrestricted sprawl of large built-up areas as the site is limited urban development and would not diminish separation from nearby built up areas; preventing neighbouring towns merging into one another as a gap between settlements is maintained; and preserving the setting and special character of historic towns as the site would have limited effect on the setting of Woodhouses. The sub-area makes a moderate contribution to assisting in safeguarding the countryside from encroachment as the release of the site would encroach on land which is open and undeveloped in character, however there is a lack of distinction with urbanising uses to the north which compromises the sense of openness.
- 14.15 In addition, the assessment identified that the impact on adjacent Green Belt from the release of this area of land would only constitute a minor weakening of retained Green Belt land.
- 14.16 As such, the assessment concluded that harm from release of this sub-area is assessed as moderate.
- 14.17 The assessment outlined potential mitigation to address harm identified across the four sub-areas, this included strengthening the boundary of the Allocation (GM-22) with surrounding retained Green Belt land could potentially increase the future

distinction between inset land and retained Green Belt land, limiting the weakening of the Green Belt boundary as a result of release of the Allocation. This could also help to limit the weakening of land between Woodhouses and Failsworth and Hollinwood.

14.18 Of the four sub-areas assessed as part of the 2019 Strategic Allocations assessment, the sub-area covering Bottom Field Farm was assessed as having the lowest harm to the Green Belt, with the other 3 sub-areas assessed as having moderate-high and high harm to the Green Belt.

14.19 The addendum report includes an assessment of allocations proposed in GMSF 2019. It considers the impact, in terms of harm to the Green Belt purposes from the release of land, of changes to the proposed allocation boundaries and areas of Green Belt release identified in the updated 2020 version of the GMSF. It should be read in conjunction with the Stage 1 and 2 reports.

14.20 As set out in this topic paper the former GM-22 Woodhouses Cluster has been amended to include only land at Bottom Field Farm. The assessment has assessed the allocation as per the new proposed allocation boundary and confirms that the site remains as having 'moderate' harm.

Cumulative Harm Assessment 2020

14.21 The Bottom Field Farm allocation is located within Strategic Green Belt Area (SGBA) 18 which separates Oldham in the north from Ashton under Lyne to the south.

14.22 In terms of cumulative harm on SGBA 18, release would have no impact on preventing urban sprawl (Purpose 1), would still leave a significant gap remaining between Woodhouses, Ashton-under-Lyne and Droylsden with significant separating features (Purpose 2), would not increase the containment of any land (Purpose 3), and would make a limited impact on the setting of Woodhouses due to size and intervening modern development (Purpose 4).

Identification of Opportunities to Enhance the Beneficial Use of the Green Belt (2020)

14.23 Lastly LUC prepared a report on the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in 2020. This report provides evidence to show where there are opportunities to offset the loss of Green Belt through compensatory improvements to the environmental quality and accessibility of retained and proposed Green Belt land. This study has sought to identify opportunities to enhance Green Infrastructure within 2km of the sites proposed for release.

14.24 These opportunities should feed into Local Plans and masterplanning work for the site allocations.

14.25 The summary of priority projects for Green Belt enhancement includes:

Access:

- Upgrade Public Footpaths DRO/71/10 and 50 FAILS to create a cycle route connecting Littlemoss / Droylsden with Woodhouses, crossing perpendicular to the disused Manchester and Ashton-under-Lyne Canal.
- Improve access control to ensure accessibility of the existing PROW network, including links to the wider Medlock Valley.
- Create a continuous cycle way link connecting Droylsden with Bardsley. This intervention will require the extension of the existing TfGM cycle network to resolve gaps along the Manchester and Ashton-under-Lyne Canal and land to the east of Stannybrook Road.
- Address gaps in the continuity of TfGM cycle network parallel the disused Manchester and Ashton-under-Lyne Canal. This includes areas adjacent Littlemoss Industrial Estate and to the east of Daisy Nook Country Park.
- Explore wider connections to link the corridor of the River Medlock and NCN 626 through the upgrade of either Waggon Road or Alt Hill Lane to a cycle network recognised by TfGM.
- Extend the dedicated cycle lane on the A627 to create strategic linkages between Ashton-under-Lyne in the south and Oldham to the north.
- Promote new multi-user routes for recreational and health benefits as part of the Carbon Landscape Project, as supported by Lancashire Wildlife Trust.
- Create an additional east-west cycle network linkage across the corridor of the M60 at Cutler Hill Road. The route would connect with the existing cycle network promoted by TfGM to the south of Crime Lake and offer wider linkages to the route of NCN 66 in Failsworth.

- Introduce strategic multi-user routes between Droylsden and Failsworth, via Woodhouses.

Sport and recreation:

- Introduce improvements to Richmond Street Playing Fields; including enhanced access control, way-marking and interpretation to encourage healthy lifestyles and increase usage of the green space assets.
- Explore the potential for offering accessible sports packages to local residents.
- Develop a partnership to guide the future management of Daisy Nook Country Park, incorporating a review of visitor facilities and opportunities for 'natural play'.

Biodiversity and wildlife corridors:

- Protect and enhance semi-natural habitats and networks; including riparian, broadleaved and ancient woodland tracts bordering the River Medlock. Preserve and reinstate hedgerows to aid habitat enhancement and visual containment. Any proposed hedgerow removal works within GM Allocation 22 should be minimised in order to retain as much hedgerow habitat as possible.
- Enhance the ecological and hydrological beneficial features within the area of retained Green Belt by combining flood risk reduction (including the alleviation of surface water flood risk issues) with green infrastructure improvements.

Landscape and visual:

- Review woodland management practices along the valley floor in order to emphasize the gap between discrete settlements.
- Restore species rich hedgerows and extend woodland belts along the tributary of the River Medlock valley floor to produce landscape benefits consistent with the aims of the Northern Forest.

14.26 In response to the above Policy JP Allocation 13 requires development to:

- Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt.
- Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

15.0 Green Infrastructure

- 15.1 There are several PROWs that run west from Failsworth Road to Waterfield Way and Leicester Road, as well as south from Hartshead Crescent and Ashton Road which provide dedicated pedestrian crossings of the M60 while also providing access towards Taunton and Ashton-under-Lyne.
- 15.2 The high-level indicative concept planning work has set out that new development will be required to incorporate high-quality landscaping and multi-functional green infrastructure that will minimise the visual impact on the wider landscape, mitigate its environmental impacts and enhances linkages with the neighbouring communities and countryside. In addition to which it states that development of the site should respect the existing landscape and ecological features of the site and beyond. The protection and enhancement of wildlife should also be prioritised. Collectively this will ensure a development that is fitting with the surroundings and promoted as an attractive, healthy place to live.
- 15.3 In response to the above Policy JP Allocation 13 sets out that development of the site is required to:
- Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;
 - Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green infrastructure network with the wider environment;
 - Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside; and
 - In addition, the allocation policy reasoned justification sets out that development of the site should have regard to the ecosystem opportunity mapping, in the improvement and enhancement of Green Infrastructure.

16.0 Recreation

- 16.1 There are no open space, sport or recreation facilities within or adjacent to the allocation.
- 16.2 The high-level indicative concept planning report emphasises that development for the site should deliver high quality landscaping and multi-functional green infrastructure. This is expected to enhance the attractiveness of the scheme and provide opportunities for open space and recreational activities for users of the site. It recommends the enhancement of recreational routes (including PRoW) connecting the site with the neighbouring countryside has also been highlighted.
- 16.3 In relation to open space, sport and recreation Policy JP Allocation 13 states that development of the site will be required to provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements.
- 16.4 At present, Local Plan policy 23 requires all major developments to contribute to new and/ or improved open space, sport and recreation provision whether onsite or, in some circumstances, offsite in line with local surplus' and deficiencies. Policy 23 will be reviewed as part of the ongoing Local Plan Review.

17.0 Landscape

- 17.1 The landscape immediately to the south is dominated by the drop in land height towards the woodland valley of the River Medlock.
- 17.2 Bottom Field Farm falls within the River Medlock landscape character area and the Incised Urban Fringe Valleys landscape character type as identified within the Landscape Character Assessment (2018), which was prepared to inform preparation of the joint plan. The assessment sensitivity tested two development scenarios against each identified landscape character area. For this character area the assessment concluded that development of two to three storey residential development would have a medium to high sensitivity. The report sets out policy guidance and recommendations to mitigate impact on the landscape as a result of development within/ impacting on the character area.

- 17.2 The guidance and opportunities to consider within this Landscape Character Type include:
- Avoid siting development on the edges of valley where buildings would be prominent on the skyline. Conserve wooded and open undeveloped skylines;
 - Utilise the screening effects of the tight valley topography and existing tree/woodland cover to integrate limited new development into the landscape;
 - Protect and where possible enhance semi-natural habitats and networks including riparian, broadleaved and ancient woodland, wet grassland, meadows and regenerating habitats on former industrial land;
 - Any new boundaries should reflect local characteristics. Strengthen the dry-stone wall network;
 - Hedgerows should be preserved and enhance where applicable. New hedgerow planting should be encouraged;
 - Avoid the felling of any significant areas of woodland to maintain the contained and secluded character of the valleys and to retain existing screening to the urban edge;
 - Explore opportunities to further develop post-industrial and reclaimed sites or habitat creation where possible;
 - Design-in the introduction of SUDs to any new development, addressing any changes in hydrology;
 - Any new development should be sympathetic in style, vernacular and form to historic industrial development within the valleys;
 - Recreational opportunities should be maintained and enhanced in order to preserve the high recreational value of the valleys as green fingers through densely populated areas; and
 - Protect the pockets of seclusion and tranquillity associated with the tightly enclosed valleys and their woodlands.
- 17.3 The principles behind the high-level indicative concept plan prepared for the allocation encourage development and urban form to be contextually responsive to the surrounding built and natural landscapes. A landscape strategy was prepared to support the high-level concept plan to retain features which contribute to the character of the site. The strategy includes, retaining existing hedgerows; using trees as boundary treatments; connect to existing PROW, to maintain openness;

incorporate SUDs; protect and enhance ecological value through planting and SUDs; and provide an attractive green entrance to the site.

- 17.4 In response to the above Policy JP Allocation 13 states that development of the site is required to:
- Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation; and
 - Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys.

18.0 Ecological/Biodiversity Assessment

- 18.1 There is a Site of Special Scientific Interest (SSSI) 1km to the south of Woodhouses. There are a number of Sites of Biological Importance (SBIs) close to Woodhouses.
- 18.2 The high-level indicative concept planning report recommends that Phase 1 Habitat Survey and associated surveys will be required at planning application stage to fully assess ecological impacts and associated mitigation requirements.

Preliminary Ecological Appraisal

- 18.3 The Preliminary Ecological Appraisal, carried out by GMEU in 2020, assessed Bottom Field Farm.
- 18.4 The assessment concluded that no designated sites will be affected. There is a possible greater crested newt population. The assessment recommended that extended Phase 1 habitat, amphibian, bird and bat surveys will be required at planning application stage.
- 18.5 In response to the above Policy JP Allocation 13 requires development of the site to retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green infrastructure

network with the wider environment; and provide further surveys and assessments on bats, great crested newts and barn owls to inform planning applications.

19.0 Habitat Regulation Assessment

- 19.1 A Habitat Regulation Assessment (HRA) has been carried out to appraise preparation of the Joint Plan by the Greater Manchester Ecology Unit (GMEU). The report includes the identification of strategic sites which may have impacts on European protected sites, an assessment of these impacts and available mitigation for these impacts. All strategic allocations have been screened into the assessment because of potential cumulative effects from air pollution caused by increased road traffic.
- 19.2 The assessment concluded that the operation of the GMSF will not cause adverse impacts on site integrity of any European designated sites providing that the recommended mitigation measures are included in the Plan and implemented. No mitigation was proposed for Bottom Field Farm.
- 19.3 It is therefore concluded that there is insufficient evidence of any harm to the special interest of European sites for which no effective mitigation is available to justify the removal of any of the proposed allocated areas for strategic development from consideration at this stage of Plan production.
- 19.4 The GMCA and TfGM are responding to Natural England's comments on the draft HRA (2020) by commissioning additional air quality modelling to more accurately assess the implications of changes in air quality on European sites that could potentially be affected by changes to nitrogen levels arising from changes in vehicle movements in Greater Manchester or within close proximity of the Greater Manchester boundary.
- 19.5 A Habitat Regulation Assessment (HRA) has been undertaken and supported by an assessment of air quality impacts on designated sites. The following sites have been screened out at Stage 1 HRA:
- Rixton Clay Pits (SAC)
 - Midland Meres & Mosses – Phase 1 Ramsar
 - Rostherne Mere (Ramsar)

19.6 The following sites requires Stage 2 Appropriate Assessment:

- Manchester Mosses (SAC)
- Peak District Moors (South Pennine Moors Phase 1) (SPA)
- Rochdale Canal (SAC)
- South Pennine Moors (SAC)
- South Pennine Moors Phase 2 (SPA)

20.0 Historic Environment Assessment

20.1 An initial Historic Environment Assessment Screening Exercise prepared by Greater Manchester Archaeology Advisory Service (GMAAS) in February 2019 recommended that Woodhouses Cluster (including the Bottom Field Farm site) is screened in for further assessment. It identified that whilst there are no designated heritage assets contained within the Sites, there are a number located further afield (Diamond Hall Farmhouse, Woodhouse Green Farmhouse and the Woodhouses Conservation Area). It concluded that there is unlikely to be any significant archaeological remains encountered on any of the sites and there appears to be little potential for historic hedgerows.

20.2 Further work recommended included a further assessment of the designated heritage assets identified outside the allocations and a historic building assessment of Bottom Field Farm.

20.3 To address the recommendations of the initial screening exercise, Oldham Council has prepared a Historic Environment Assessment for each of its strategic allocations to inform the Joint Plan. In terms of Bottom Field Farm, the assessment identified that there are three designated heritage assets close to the site. The assessment concludes that the Bottom Field Farm proposed strategic allocation does not make any contribution to the assets.

20.4 The assessment set out enhancement and harm mitigation measures for the allocation, including:

- Reference should be made to the recommendation of the Greater Manchester Landscape Character and Sensitivity assessment; and

- Ensure new development is in keeping with the surrounding character of the area through the use of local materials and design.

20.5 The high-level indicative concept planning report has identified that the site sits in close proximity of Woodhouses Conservation Area. The site has limited views of the conservation area due to the presence of housing and other developments not within the conservation area facing onto the farm. Development of the site would be previously developed land therefore it is not considered that this affects the setting of the conservation area.

20.6 In response to the above Policy JP Allocation 13 sets out that development of the site is required to conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications. Development should be in keeping with the local character of Woodhouses in terms of materials, design and landscaping.

20.8 Furthermore, Policy JP Allocation 13 requires development of the site to take into consideration the findings of the Greater Manchester Historic Environment Assessment Screening Exercise and provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed.

21.0 Air Quality and Noise

21.1 Air Quality is covered by thematic policy JP-S 6 Clean Air in PfE 2021 which sets out a range of measures to support air quality. PfE 2021 sets out a commitment to improving air quality by locating development in locations which are most accessible to public transport. The proposed allocation is close to an AQMA.

21.2 The principles behind the high-level indicative concept plan encourages active travel to be considered through the development of the site, whereby development should promote and encourage sustainable modes of travel within and beyond the site.

21.3 There are no particular noise constraints identified for this site.

21.4 Policy JP-G 7 of PfE 2021 aims to significantly increase tree cover and protect and enhance woodland. The justification for the policy notes that trees and woodland can help mitigate noise pollution.

Section D – Social

22.0 Education

- 22.1 It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision.
- 22.2 Within a 1.5-mile radius of Bottom Field Farm there are 11 primary schools (including Woodhouses Primary). Within 3 miles, there are 9 secondary schools and 5 other education provision facilities.
- 22.3 In response to the above Policy Allocation JP 13 states that any development is required to contribute to additional school places to meet increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority.
- 22.3 Oldham Council is currently working on developing a methodology for S106 Contributions for Education. Once finalised these will be used to secure contributions towards education provision as appropriate.

23.0 Health

- 23.1 The high-level indicative concept planning report identified that a number of GPs can be found in the surrounding urban areas, such as Failsworth, Hollinwood and Newton Heath. While these could be considered drivable many of these services are not located within reasonable walking distances from the site. In terms of hospitals, the Royal Oldham Hospital is located within 5 miles from the site and Tameside General Hospital is within 3.5 miles from the site. These findings suggest development should consider the access to local health services that will serve the anticipated population for the site.
- 23.2 In response to the above Policy JP Allocation 13 requires any development of the site to contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision.

23.3 The Integrated Assessment has incorporated a Health Impact Assessment. Bottom Field Farm scored very positive against the indicators of 'supporting healthier lifestyles and supporting improvements in determinants of health'; 'promote access to green space'; and 'ensure people are adequately served by key healthcare facilities regardless of socio-economic status'. This is due to the allocation policy including delivering multi-functional green infrastructure, enhanced linkages to the countryside, enhanced biodiversity, and requiring contributions towards new or improved open space provision and healthcare facilities.

Section E – Deliverability

24.0 Viability

Three Dragons Viability Assessment

- 24.1 The team of Three Dragons, Ward Williams Associates and Troy Planning and Design were commissioned to undertake a Viability Assessment of the Spatial Framework (VASF) to test whether the requirements of the National Planning Policy Framework (NPPF) are met, that is that the policy requirements in a plan should not threaten the development viability of the plan as a whole.
- 24.2 Within this broad aim, the GMCA sets out a number of objectives for the VASF that are summarised as being to:
- Meet the tests of soundness, using the approach to viability set out in guidance;
 - Address issues identified in consultation and engage with the development industry;
 - Provide a broad strategic understanding of viability, including costs and values, across Greater Manchester area based on current available information;
 - Test the viability and deliverability of an appropriate range of sample sites across Greater Manchester, including allocated sites; and
 - Identify policies that will affect viability and examine the likely cumulative viability impact of the proposed policies and standards in the Plan.
- 24.3 The VASF comprises three linked reports, The Strategic Viability Report, The Allocated Sites Viability Report and the Consultation Report. These are available on the GMCA website.
- 24.4 For the allocated sites viability testing, site characteristics, values and costs collected for the viability modelling drew on analysis of national and local datasets and policy documents and local consultations.
- 24.5 For all sites results are presented in terms of headroom available after developer return has been taken into account. On some sites further sensitivity testing has

been carried out to show the impact of changes to the assumptions, based on the council's justification to move away from the main model of testing.

- 24.6 In terms of benchmark land values for the purposes of the allocated sites they have all been considered as strategic greenfield with a benchmark land values of £250,000 per gross hectare, on the basis of consistency and that the majority of the sites are greenbelt releases and/or predominantly greenfield.
- 24.7 In terms of residential values, the assumptions sheet in the Strategic Viability Assessment Stage 2 Allocated Sites report sets out the values used for the individual site. For some allocations the local authority has suggested alternative figures. These are set out as sensitivity tests to the standard approach.
- 24.8 In terms of attributing build and site costs, Oldham Council has provided a high-level indicative concept plan for the Bottom Field Farm allocation setting out broad form of development for the site. This has informed the build costs of £2,803,533 for the site, as well as a degree of judgement from the consultants and officers.
- 24.9 In terms of the policy and mitigation costs assumed for this allocation, Oldham Council has provided affordable housing assumptions, education requirements and open space/recreation requirements to be used within the testing based on the currently adopted Local Plan policies and/or updated evidence. The figures used are set out in the assumption sheet in the Strategic Viability Assessment Stage 2 Allocated Sites report. For the Bottom Field Farm allocation, affordable housing contribution was tested at 15% of the site capacity with a split of 50% Affordable Rent and 50% Shared Ownership, as per the recommendations of Oldham's Housing Strategy.
- 24.10 There are a range of other policy and mitigation costs around accessibility, future homes standards, electric charging points and biodiversity net gain that need to be applied when undertaking the testing, based on National and proposed PfE policies. These are applied in the same way as the generic testing and further detail can be found in section 4 of the Strategy Viability Assessment. In addition to the affordable housing contribution tested, other planning obligation costs to a total of £321,843 were tested for this allocation.

24.11 In terms of transport costs, two types have been modelled. The first are costs found within the site and include roads serving the development, immediate site access and provision for pedestrians and cyclists, where available. For this site this information was provided by the Three Dragons team on the basis of available masterplans and in liaison with the Council's highways team – Unity Partnership. These on-site transport costs were included in the main viability testing. For Bottom Field Farm strategic transport costs of £60,000 were tested. Full costings are set out in the allocation's assumption sheet set out in the Strategic Viability Assessment Stage 2 Allocated Sites report

24.12 Table Five below sets out the results of the viability assessment for the site.

24.13 A sensitivity test was carried out that increased selling prices by 10%. The council consider that the location of the site in Woodhouses within a strong housing market provides the potential to deliver a range of high-quality housing in an appealing location. Recent development in the area has shown it commands high values. It is therefore reasonable to assume that a development in this location would be popular with accelerated sales rates and values.

Table Five: Results of the Allocation Viability Assessment

Site Ref	Site Name	Scheme Type	Main/Sensitivity Test	Scheme RV incl land costs	Scheme RV (less return)	Strategic transport costs	Out-turn scheme RV
GM13	Bottom Field Farm (Woodhouses)	Housing	Main model	£987,371	£10,000	£60,000	-£50,000
GM13	Bottom Field Farm (Woodhouses)	Housing	Sensitivity test – increase sales values by 10%	£1,552,604	£470,000	£60,000	£410,000

24.14 As Table Five shows, the site is not viable with the main test taking into account the strategic transport costs. With these costs included, the site is in a marginal deficit by £50,000.

24.15 With the sensitivity test applied, the site is more viable with a stronger residual value of £410,000.

25.0 Phasing

25.1 The phasing and delivery assumptions used to inform the high-level indicative concept plan, identified the site being deliverable within 4 years in the medium term. Further refinement of the allocation trajectory based on local evidence and taking into account other nearby allocations, has informed the following trajectory for the allocation:

- Outlet 1 – 15 homes in 2025/26; 15 homes in 2026/27.

25.3 The trajectory assumes a lower than average build-out rate for Oldham (which for sites with a capacity between 20-49 homes is around 20 homes per year on average). The reasoning for this is that given the capacity and location of the site, the site may be suitable/ attractive to Small and Medium Enterprise housebuilders (SME), who may not have the capacity to deliver at the average build-out rate.

25.4 In terms of delivery of the site, the high-level indicative concept plan states that as the site is located in the desirable area of Woodhouses with direct access into the site from Heartshead Crescent to the north of the site, it is expected that a development in this location will achieve accelerated sales rates.

25.5 As stated above the phasing and delivery assumptions are based on the high-level indicative concept plan and local knowledge regarding build-out rates. It is important to note that sites, and parcels within sites, may come forward differently.

26.0 Indicative Masterplanning

26.1 As referred to throughout this report a high-level indicative concept plan and accompanying report has been prepared to inform the allocation and this topic paper.

26.2 The high-level indicative concept plan and accompanying report has been produced to demonstrate deliverability and feasibility of development at the proposed allocation. Within the report a high-level opportunities and constraints, landscape and ecology appraisal, and a townscape analysis has been carried out.

26.3 Collectively, the analysis and outcomes have informed a set of strategic design principles developed specifically for the site and:

- An Urban Design Strategy to guide development of the high-level indicative concept plan.
- A Movement Strategy which considers access, vehicular hierarchy and access, pedestrian movement and public transport provision.
- Open Space and Landscape Strategy which considers existing water features, hedgerows and trees, openness, key green spaces, SUDs, ecology corridors and green routes.

26.4 Appendix 2 contains the high-level indicative concept plan for the allocation. The associated high-level indicative concept planning report is available on the GMCA website. Due to the size of the allocation Policy JP Allocation 13 does not specifically require the need for development to be in accordance with a comprehensive masterplan and design code. However, the council will encourage any developer to consider and plan for the site as whole through the preparation of a masterplan as part of the planning application process.

Section F – Conclusion

27.0 The Sustainability Appraisal

- 27.1 Bottom Field Farm generally performed positively against the strategic objectives of the plan. This is covered in section 7 of the topic paper.
- 27.2 A 2021 PfE Integrated Appraisal Addendum has been produced and has reviewed the changes made between GMSF 2020 and PfE 2021. As there have been no substantial changes to this specific allocation between GMSF 2020 and PfE 2021 and the 2020 IA recommendations which had been incorporated into the GMSF 2020 remain in the PfE Policy, there has been no change to the assessment of this Policy in relation to the IA Framework since 2020.

28.0 The main changes to the Proposed Allocation

- 28.1 The allocation has changed significantly since GMSF 2019, where it was included within the (formerly) proposed GM-22 Woodhouses Cluster strategic allocation. The allocation wording now reflects the allocation as a single site (Bottom Field Farm only).
- 28.2 The proposed changes to the policy wording between 2019 and 2020 for Bottom Field Farm (Woodhouses) allocation and the reasonings are set out in Appendix 3. The full allocation policy as proposed in PfE 2021 is available in Appendix 1.
- 28.3 Limited changes have been made to the Bottom Field Farm (Woodhouses) allocation between the 2020 Draft GMSF and PfE 2021. Details of these can be found at Appendix 4.
- 28.4 In addition to the changes referred to above there have also been some minor changes made to the policy and reasoned justification relating to references to GM, where this is no longer appropriate, policy references, numbering and other minor typographical errors.

- 28.5 In terms of the changes between the GMSF 2020 and the PfE 2021, as these changes were either minor or as a result of Stockport's withdrawal from the plan, it is concluded that the effect of the plan is substantially the same on the districts as the 2020 version of the policy.
- 28.6 It is considered that these policy changes, along with the other requirements set out in the policy, will deliver a high quality, sustainable development that will help to deliver the vision, plan objectives and overall spatial strategy of PfE.

29.0 Conclusion

- 29.1 The Bottom Field Farm site is currently designated as Green Belt and measures 0.98ha in size. The site is currently occupied by farm buildings and access and is a previously developed site within the Green Belt.
- 29.2 The strategic allocation is proposed to deliver around 30 homes, aiming to provide a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing and affordable housing.
- 29.3 The high-level indicative concept planning identified a developable area of 0.83ha and a proposed density of around 36 homes per hectare.
- 29.4 The site is well placed to utilise existing infrastructure, therefore providing a logical area for development of this Brownfield site in the Green Belt. The site will be accessed off the existing farm access off Hartshead Crescent, which will be modified to make it suitable for development traffic. Development of the site will also be required to take account of and deliver any other highway improvements, that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area, including off-site highway improvements, high-quality walking and cycling infrastructure and public transport facilities.
- 29.5 Development of the site is required to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy.

- 29.6 Development of the site will also deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation.
- 29.7 It is considered that the proposed allocation at Bottom Field Farm meets the Green Belt exceptional circumstances as the allocation is capable of meeting the site selection criteria, which seeks to identify locations for strategic allocations which meet objectives of the plan as a whole, thus meeting the wider strategic case for exceptional circumstances to alter the Green Belt.
- 29.8 Overall, it is considered that the policy, along with the other requirements set out in the policy, will deliver a high quality, sustainable development that will help to deliver the vision, plan objectives and overall spatial strategy of PfE.
- 29.9 The full strategic allocation policy wording and reasoned justification is set out in Appendix 1. A full suite of evidence and background papers are available on the GMCA website

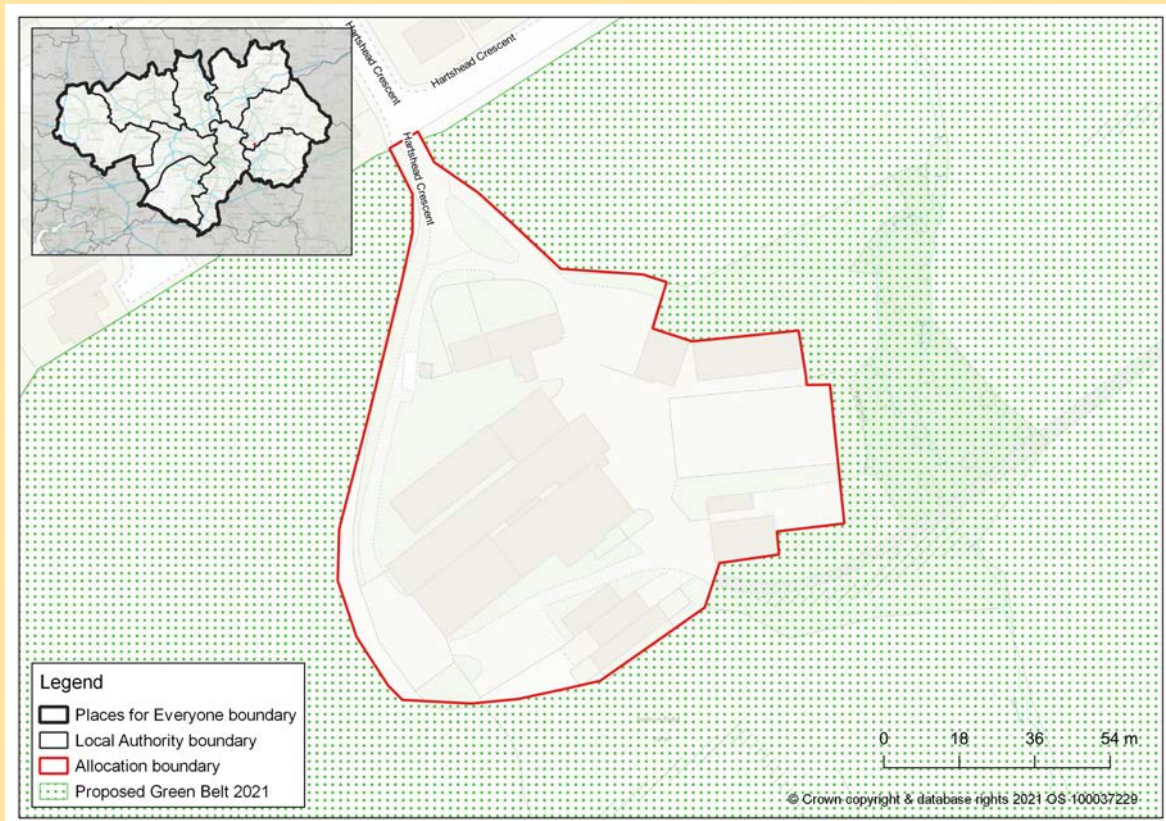
Section G – Appendices

29.8 Appendix 1: JPA-13 Bottom Field Farm (Woodhouses) Allocation Policy (as proposed in PfE 2021)

Bottom Field Farm (Woodhouses)

Policy JP Allocation 13

Bottom Field Farm (Woodhouses)



Picture 11.24 JPA 13 Bottom Field Farm (Woodhouses)

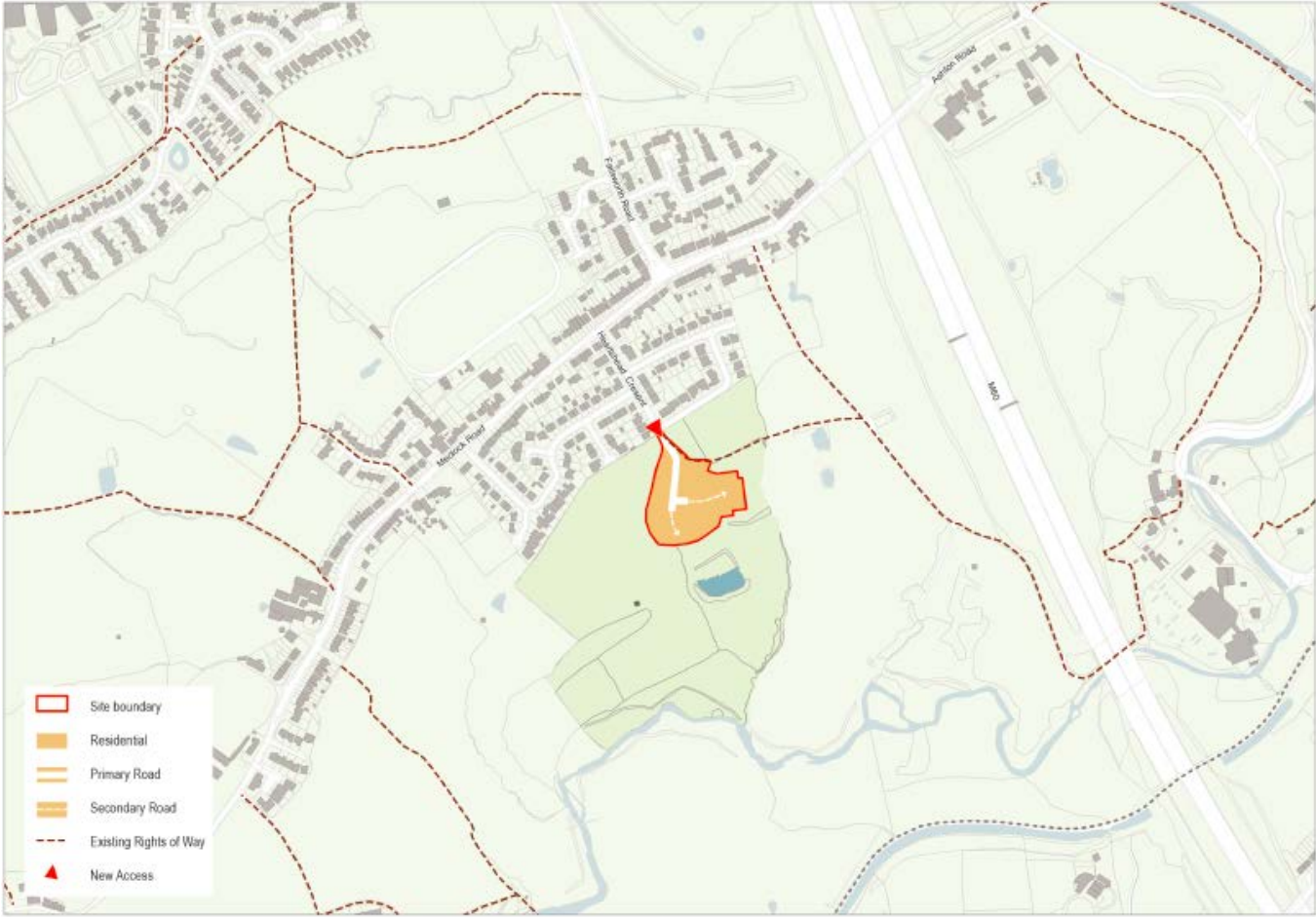
Development of this site will be required to:

1. Deliver around 30 homes, providing a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing;
2. Provide affordable homes in line with local planning policy requirements;
3. Provide for appropriate access to and from the site in liaison with the local highway authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site;
4. Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;

5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys;
6. Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green infrastructure network with the wider environment;
7. Provide further surveys on amphibians, birds, bats and extended phase 1 habitat surveys to inform planning applications;
8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside;
9. Provide for new and/or the improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements;
10. Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt;
11. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;
12. Contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;
13. Contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision;
14. Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications. Development should be in keeping with the local character of Woodhouses in terms of materials, design and landscaping;
15. Take into consideration the findings of the Greater Manchester Historic Environment Assessment Screening Exercise, and provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed; and
16. Be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.

- 11.148** The site is currently designated as Green Belt in the Oldham Local Plan. However, the site is brownfield land in the Green Belt. Whilst a significant proportion of Oldham's housing land will come from the urban area through maximising the use of brownfield land, it is considered that the site will help to diversify the existing housing stock in the area and boroughwide. The site has the potential to contribute to meeting local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area, adding to the type and range of housing available. The location of the site, in a strong housing market, provides the potential for a range of high-quality housing in an attractive and accessible location.
- 11.149** Affordable housing will be provided as part of any development of the site, including a range of tenures, house sizes and types, in order to meet the needs of residents as appropriate. Affordable housing will be delivered in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform the Local Plan affordable housing policy.
- 11.150** The site may have ecological value that would need to be mitigated and integrated into the development as part of a complementary multi-functional green infrastructure.
- 11.151** It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and that any development takes account of the increased demand it may place on existing provision. Any development would need to provide:
- a. new and/or improvement of existing open space, sport and recreation facilities;
 - b. additional school places through the expansion of existing facilities or provision of new school facilities; and
 - c. provide for appropriate health and community facilities.
- 11.152** These would need to be provided in line with local planning policy requirements and in liaison with the local authority.
- 11.153** Development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure.
- 11.154** Woodhouses Conservation Area is in close proximity to the site and, whilst outside the boundary, any development would need to consider the impact on its setting through the completion of a further Heritage Impact Assessment.
- 11.155** A flood risk assessment will be required to inform any development and a comprehensive drainage strategy for the site as a whole should be prepared as part of the more detailed masterplanning stage, in line with the Greater Manchester Strategic Flood Risk Assessment (SFRA) SUDs guidance, to ensure that undue pressure and burden is not placed on existing utilities infrastructure through piecemeal and uncoordinated development. Proposals should be supported by a maintenance plan.

Appendix 2: High-level Indicative Concept Plan for Bottom Field Farm



Appendix 3: Main Changes to the Proposed Bottom Field Farm Allocation Policy (2019 compared to GMSF Publication plan Draft for Approval October 2020)

Draft 2019 Strategic Allocation Policy	2020 Strategic Allocation Policy	Reason
	Policy number and name changed from Policy GM Allocation 22 - Woodhouses to Policy GM Allocation 13 - Bottom Field Farm (Woodhouses)	To reflect that allocation only relates to Bottom Field Farm.
	Allocation amended to only include Bottom Field Farm. Map amended.	To reflect that allocation only relates to Bottom Field Farm.
1. Deliver around 260 homes, providing a range of dwelling types and sizes so as to deliver inclusive neighbourhoods and meet local needs, including a mix of high quality family housing;	1. Deliver around 30 homes, providing a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing;	To reflect that allocation only relates to Bottom Field Farm and reduce site area.
2. Make provision for affordable homes in line with local planning policy requirements;	2. Provide affordable homes in line with local planning policy requirements;	Editorial
3. Provide for appropriate access points to and from the sites in liaison with the local highways authority and take account of and deliver any other improvements that may be needed so as to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site;	3. Provide for appropriate access points to and from the sites in liaison with the local highways authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site;	No change.
4. Deliver multi-functional green infrastructure and high quality landscaping within the site and around the main development areas so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring	4. Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance	Amended to separate out landscape character area element.

communities and countryside. Regard should also be had to the conclusions of the Landscape Character Assessment for the Incised Urban Fringe Valleys – Medlock Valley Landscape Character Area;	linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;	
	5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys;	New criterion added to reflect evidence.
5. Retain and enhance areas of biodiversity within the site (most notably the existing Brookdale Golf Course and Lord's Brook Flushes SBIs) and the areas of priority habitats and protected species, to deliver a clear and measurable net gain in biodiversity;	6. Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green infrastructure network with the wider environment;	Reference to Brookdale Golf Course and Lord's Brook Flushes SBIs removed to reflect that allocation only relates to Bottom Field Farm and reduce site area
	7. Provide further surveys and assessments on bats, great crested newts and barn owls to inform planning applications;	New criterion added to reflect evidence.
6. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network so as to encourage active travel and improve connections and access to adjoining communities and countryside;	8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside;	No change
7. Provide for new and/or improvement of existing open space, sport and recreation facilities, commensurate with the demand generated, in line with local planning policy requirements;	9. Provide for new and/or the improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements;	No change
	10. Have regard to the findings of the Stage 2	New criterion added to reflect evidence.

	Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt;	
	11. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;	New criterion added to reflect evidence.
8. Provide for additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;	12. Contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;	Editorial
9. Provide for appropriate health and community facilities to meet the increased demand that will be placed on existing provision;	13. Contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision;	
10. Identify any designated and non-designated heritage assets and assess the potential impact on the asset and its setting, when bringing forward the proposals;	14. Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications. Development should be in keeping with the local character of Woodhouses in terms of materials, design and landscaping;	Updated to reflect evidence.
11. Identify any assets of archaeological interest, assess the potential impact on the asset and include appropriate mitigation	15. Take into consideration the findings of the Greater Manchester Historic Environment Assessment Screening Exercise, and	Updated to reflect evidence.

<p>strategies, which may include controlled investigation; and</p>	<p>provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed; and</p>	
<p>12. Be informed by an appropriate flood risk assessment and comprehensive drainage strategy for each site and deliver any appropriate recommendations and measures (including mitigation measures and the incorporation of sustainable drainage systems) so as to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network.</p>	<p>16. Be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.</p>	<p>Updated to reflect evidence.</p>

Appendix 4: Changes to the Proposed Bottom Field Farm Allocation Policy (GMSF 2020 compared to PfE 2021)

2020 Strategic Allocation Policy	2021 Strategic Allocation Policy	Reason
Policy number and name changed from Policy GM Allocation 22 - Woodhouses to Policy GM Allocation 13 - Bottom Field Farm (Woodhouses)		
Allocation amended to only include Bottom Field Farm. Map amended.		
1. Deliver around 30 homes, providing a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing;	1. Deliver around 30 homes, providing a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing;	No change
2. Provide affordable homes in line with local planning policy requirements;	2. Provide affordable homes in line with local planning policy requirements;	No change
3. Provide for appropriate access points to and from the sites in liaison with the local highways authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site;	3. Provide for appropriate access to and from the site in liaison with the local highway authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site;	Typographical change to remove 's' from 'highways'.
4. Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape,	4. Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape,	No change

mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;	mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;	
5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys;	5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys;	No change
6. Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green infrastructure network with the wider environment;	6. Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green infrastructure network with the wider environment;	No change
7. Provide further surveys and assessments on bats, great crested newts and barn owls to inform planning applications;	7. Provide further surveys on amphibians, birds, bats and extended phase 1 habitat surveys to inform planning applications;	Amended to reflect evidence.
8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside;	8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside;	No change
9. Provide for new and/or the improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements;	9. Provide for new and/or the improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements;	No change

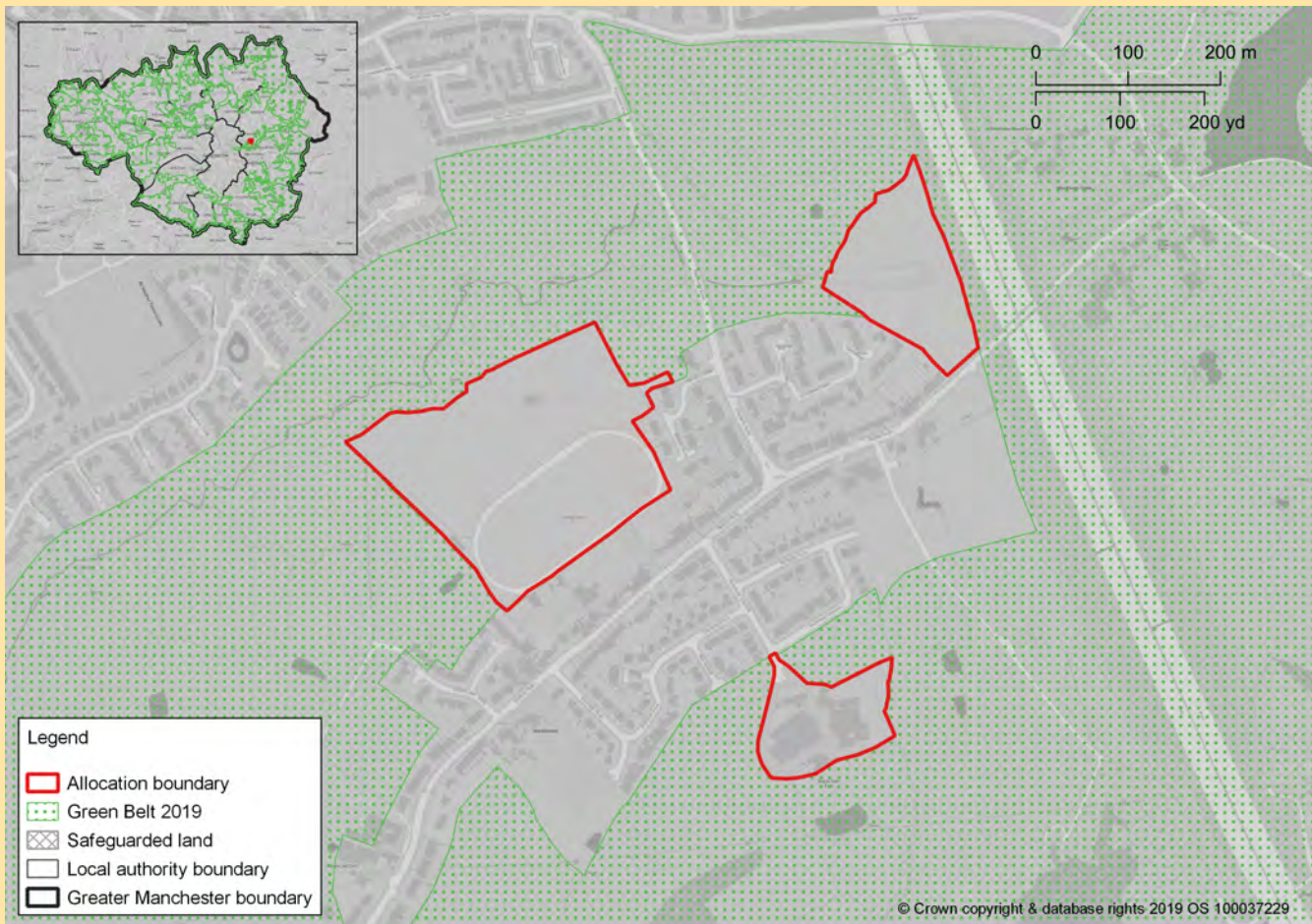
<p>10. Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt;</p>	<p>10. Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt;</p>	<p>No change</p>
<p>11. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;</p>	<p>11. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;</p>	<p>No change</p>
<p>12. Contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;</p>	<p>12. Contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;</p>	<p>No change</p>
<p>13. Contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision;</p>	<p>13. Contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision;</p>	<p>No change</p>
<p>14. Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications. Development should be in keeping with the local character of Woodhouses in terms of materials, design and landscaping;</p>	<p>14. Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications. Development should be in keeping with the local character of Woodhouses in terms of materials, design and landscaping;</p>	<p>No change</p>
<p>15. Take into consideration the findings of the Greater Manchester Historic Environment Assessment</p>	<p>15. Take into consideration the findings of the Greater Manchester Historic Environment Assessment</p>	<p>No change</p>

<p>Screening Exercise, and provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed; and</p>	<p>Screening Exercise, and provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed; and</p>	
<p>16. Be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.</p>	<p>16. Be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.</p>	<p>No change</p>

Appendix 5: GMSF 2019 Policy wording –Woodhouses Cluster

Policy GM Allocation 22

Woodhouses



Development at these sites will be required to:

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

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

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

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

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

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

11.153 Woodhouses Conservation Area is close to the three sites and, whilst outside their boundary, any development would need to consider the impact on its setting through the completion of a Heritage Impact Assessment.

11.154 A flood risk assessment will be required to inform any development and a comprehensive drainage strategy for the site as a whole should be prepared as part of the more detailed masterplanning stage, in line with the Greater Manchester Strategic Flood Risk Assessment (SFRA) SUDs guidance, to ensure that undue pressure and burden is not placed on existing utilities infrastructure through piecemeal and uncoordinated development. Proposals should apply greenfield run off rates and be supported by a maintenance plan.

Question 101

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

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

What is the reason for your answer?

Question 102

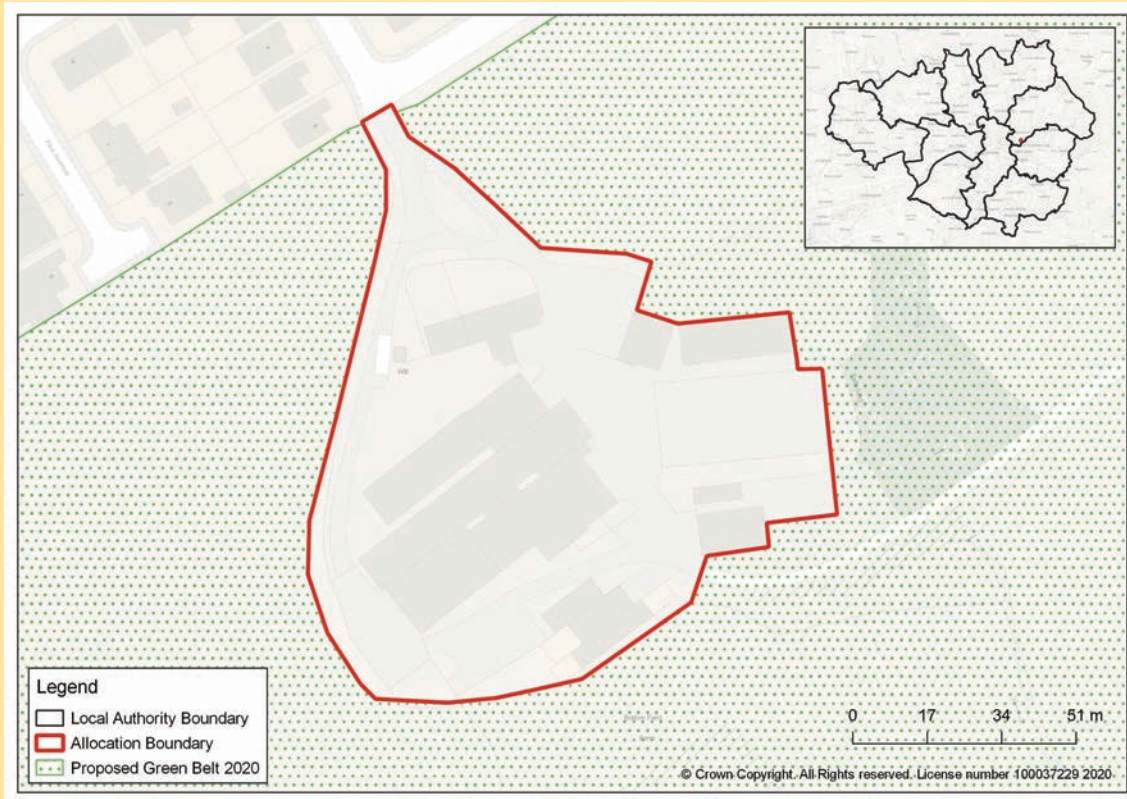
Do you have any further comments on the overall proposals for Oldham, including the strategic transport interventions?

Appendix 6: 2020 Policy wording – Bottom Field Farm (Woodhouses)

Bottom Field Farm (Woodhouses)

Policy GM Allocation 13

Bottom Field Farm (Woodhouses)



Picture 11.23 GMA 13 Bottom Field Farm (Woodhouses)

Development of this site will be required to:

1. Deliver around 30 homes, providing a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing;
2. Provide affordable homes in line with local planning policy requirements;
3. Provide for appropriate access points to and from the sites in liaison with the local highways authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site;
4. Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;

5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys;
6. Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green infrastructure network with the wider environment;
7. Provide further surveys and assessments on bats, great crested newts and barn owls to inform planning applications;
8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside;
9. Provide for new and/or the improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements;
10. Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt;
11. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;
12. Contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;
13. Contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision;
14. Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications. Development should be in keeping with the local character of Woodhouses in terms of materials, design and landscaping;
15. Take into consideration the findings of the Greater Manchester Historic Environment Assessment Screening Exercise, and provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed; and
16. Be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.

- 11.146** The site is currently designated as Green Belt in the Oldham Local Plan. However, the site is brownfield land in the Green Belt. Whilst a significant proportion of Oldham’s housing land will come from the urban area through maximising the use of brownfield land, it is considered that the site will help to diversify the existing housing stock in the area and boroughwide. The site has the potential to contribute to meeting local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area, adding to the type and range of housing available. The location of the site, in a strong housing market, provides the potential for a range of high-quality housing in an attractive and accessible location.
- 11.147** Affordable housing will be provided as part of any development of the site, including a range of tenures, house sizes and types, in order to meet the needs of residents as appropriate. Affordable housing will be delivered in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform the Local Plan affordable housing policy.
- 11.148** Whilst the site may have ecological value that would need to be mitigated and integrated into the development as part of a complementary multi-functional green infrastructure.
- 11.149** It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and that any development takes account of the increased demand it may place on existing provision. Any development would need to provide:
- a. new and/or improvement of existing open space, sport and recreation facilities;
 - b. additional school places through the expansion of existing facilities or new provision of new school facilities; and
 - c. provide for appropriate health and community facilities.
- 11.150** These would need to be provided in line with local planning policy requirements and in liaison with the local authority.
- 11.151** Development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure.
- 11.152** Woodhouses Conservation Area is in close proximity to the site and, whilst outside the boundary, any development would need to consider the impact on its setting through the completion of a further Heritage Impact Assessment.
- 11.153** A flood risk assessment will be required to inform any development and a comprehensive drainage strategy for the site as a whole should be prepared as part of the more detailed masterplanning stage, in line with the Greater Manchester Strategic Flood Risk Assessment (SFRA) SUDs guidance, to ensure that undue pressure and burden is not placed on existing utilities infrastructure through piecemeal and uncoordinated development. Proposals should apply greenfield run off rates and be supported by a maintenance plan.

Appendix 7: Call for Sites falling within Area of Search OL-AS-8

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
1452529193572	Land at Woodhouses	Site is within Area of Search OL-AS-8 and within GMSF 2019 allocation GM Allocation 22	Site is within Area of Search OL-AS-8 and is not proposed for allocation in draft GMSF 2020	No Change from 2020	Majority of the site is greenfield land in the Green Belt (92.87%). Part of site considered as part of Woodhouses Cluster in GMSF 2019 (Policy GM Allocation 22). The allocation was removed as part of PfE 2021 for the following reasons: 1) it is considered that it would lead to over development; and 2) Sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1453461167378	Land west of Failsworth Road, Woodhouses	Site is within Area of Search OL-AS-8 and within GMSF 2019 allocation GM Allocation 22	Site is within Area of Search OL-AS-8 and is not proposed for allocation in draft GMSF 2020	No Change from 2020	Site is 100% greenfield in the Green Belt. Part of site considered as part of Woodhouses Cluster in GMSF 2019 (Policy GM Allocation 22). The allocation was removed as part of PfE 2021 for the following reasons: 1) it is considered that it would lead to over development; and 2) Sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1453817966680	Bottom Field Farm 2	Site is within Area of Search OL-AS-8 and within GMSF 2019 allocation GM Allocation 22	Site is within Area of Search OL-AS-8 but not proposed within GMSF 2020	No change from 2020	100% greenfield land in the Green Belt. Site considered as part of options development for the Woodhouses Cluster. It is not suitable for inclusion as a strategic

1.10

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
					allocation for the following reasons: 1) it is considered that it would lead to over development; and 2) Sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1453819465240	Land south of Cutler Hill Road, Failsworth	Site is within Area of Search OL-AS-8. Not proposed for allocation in the draft GMSF 2019	No Change from 2019	No Change from 2019	100% greenfield land in the Green Belt. Site considered as part of options development for the Woodhouses Cluster. It is not suitable for inclusion as a strategic allocation for the following reasons: 1) it is considered that it would lead to over development; and 2) Sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1453975604425	Land off Failsworth Road/Medlock Road, Woodhouses, Oldham	Site is within Area of Search OL-AS-8 and within GMSF 2019 allocation GM Allocation 22	Site is within Area of Search OL-AS-8 and not proposed within GMSF 2020	No Change from 2020	Majority of the site is greenfield land in the Green Belt (93.86%). Part of site considered as part of Woodhouses Cluster in GMSF 2019 (Policy GM Allocation 22). The allocation was removed as part of PfE 2021 as not considered suitable for the following reasons: 1) it is considered that it would lead

1.10

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
					to over development; and 2) Sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer
1454412612634	Land North of Ashton Road, Woodhouses - Site A	Site is within Area of Search OL-AS-8 and within GMSF 2019 allocation GM Allocation 22	Site is within Area of Search OL-AS-8 and not proposed for allocation in Draft GMSF 2020	No Change from 2020	100% greenfield land in the Green Belt. Site considered as part of options development for the Woodhouses Cluster. It is not suitable for inclusion as a strategic allocation for the following reasons: 1) it is considered that it would lead to over development; and 2) Sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1454413167450	Land North of Ashton Road, Woodhouses - Site B	Site is within Area of Search OL-AS-8 and within GMSF 2019 allocation GM Allocation 22	Site is within Area of Search OL-AS-8 and not proposed for allocation in Draft GMSF 2020	No Change from 2020	Site is 100% greenfield in the Green Belt. Part of site considered as part of Woodhouses Cluster in GMSF 2019 (Policy GM Allocation 22). The allocation was removed as part of PfE 2021 for the following reasons: 1) it is considered that it would lead to over development; and 2) Sufficient housing land supply identified to deliver the vision, plan objectives and overall

1.10

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
					spatial strategy whilst maintaining a reasonable buffer.
1624523343004	Land south of Argyll Park Road	Site is within Area of Search OL-AS-8. Not proposed for allocation in the draft GMSF 2019.	No change from 2019	No change from 2019	100% greenfield land in the Green Belt. Site considered as part of options development for the Woodhouses Cluster. The site was not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1624523343003	Land east of Failsworth Road	Site is within Area of Search OL-AS-8. Not proposed for allocation in the draft GMSF 2019.	No change from 2019	No change from 2019	100% greenfield land in the Green Belt. Site considered as part of options development for the Woodhouses Cluster. The site was not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1624523343002	Land off Waterfield Way	Site is within Area of Search OL-AS-8. Not proposed for allocation	No change from 2019	No change from 2019	100% greenfield land in the Green Belt. Site considered as part of options development for the Woodhouses Cluster. The site was

1.10

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
		in the draft GMSF 2019.			not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1624523343000	Withins Hall Farm	Site is within Area of Search OL-AS-8. Not proposed for allocation in the draft GMSF 2019.	No change from 2019	No change from 2019	100% greenfield land in the Green Belt. Site considered as part of options development for the Woodhouses Cluster. The site was not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1624523343001	Land west of Failsworth Road	Site is within Area of Search OL-AS-8. Not proposed for allocation in the draft GMSF 2019.	No change from 2019	No change from 2019	100% greenfield land in the Green Belt. Site considered as part of options development for the Woodhouses Cluster. The site was not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) sufficient housing land supply identified to deliver the vision, plan objectives

1.10

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
					and overall spatial strategy whilst maintaining a reasonable buffer.

Section H – Bibliography

PfE2021 and all supporting documents referred to within this topic paper and listed below can be found at (<https://www.greatermanchester-ca.gov.uk/placesforeveryone>)

Concept Planning

- Oldham GMSF Concept Plan and Report - Broadbent Moss and Beal Valley - IBI Group, Amion and JLL on behalf Oldham Council, October 2018

Environment

- Preliminary Ecological Appraisals – Areas being considered for allocation for future development within the Greater Manchester Spatial Framework in Oldham; GMEU; June 2020
- Greater Manchester Landscape Character and Sensitivity Assessment – Land Use Consultants (LUC), September 2018
- Habitat Regulations Assessment of the Greater Manchester Spatial Framework – Greater Manchester Ecology Unit (GMEU), October 2020

Flooding

- Level 1 Strategic Flood Risk Assessment for Greater Manchester – Update; JBA Consulting; March 2019

Green Belt

- Stage 1 Greater Manchester Green Belt Assessment: LUC; 2016
- Stage 1 Greater Manchester Green Belt Assessment – Appendices; LUC; 2016
- Stage 2 GM Green Belt Study - Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions; LUC; 2020
- Stage 2 Greater Manchester Green Belt Study: Assessment of Proposed 2019 GMSF Allocations; LUC; September 2020
- Stage 2 Greater Manchester Green Belt Study - Assessment of Proposed 2019 Allocations - Appendix B; LUC; 2020
- Stage 2 GM Green Belt Study - Addendum: Assessment of Proposed GMSF Allocations; LUC; 2020
- Stage 2 GM Green Belt Study - Contribution Assessment of Proposed 2020 GMSF Green Belt Additions; LUC; 2020

1.10

- Identification of Opportunities to Enhance the Beneficial Use of the Green Belt – Land Use Consultants; LUC; September 2020

Historic Environment

- Historic Environment Assessment Screening Exercise - Greater Manchester Archaeology Advisory Service (GMAAS), February 2020
- Historic Environment Assessment for Places for Everyone: Oldham Allocations; Oldham Council; June 2021

Integrated Assessment

- Integrated Assessment of the Greater Manchester Spatial Framework - Arup & Greater Manchester Combined Authority, January 2019
- Integrated Assessment of the Greater Manchester Spatial Framework – IA of 2020 draft GMSF Consultation Document; GMCA / ARUP; October 2020

Plan versions

- Greater Manchester’s Plan for Homes, Jobs and the Environment – Greater Manchester Spatial Framework (GMSF) Revised Draft; GMCA; January 2019 (GMSF 2019)
- Greater Manchester’s Plan for Homes, Jobs and the Environment: Greater Manchester Spatial Framework Publication Plan 2020 – Draft for Approval; GMCA; October 2020 (GMSF 2020)

Site Selection

- Greater Manchester’s Plan for Homes, Jobs and the Environment – Site Selection Process Background Paper; GMCA

Transport

- Transport Locality Assessments – Introductory Note and Assessments – Oldham Allocations - Beal Valley; Systra; November 2020

Viability

1.10

- Greater Manchester Spatial Framework Strategic Viability Report – Stage 2 Allocated Sites Viability Report; Three Dragons, Ward Williams Associates, Troy Planning + Design (on behalf of GMCA); October 2020
- Greater Manchester Spatial Framework Strategic Viability Report – Stage 2 Allocated Sites Viability Report - Amended; Three Dragons, Ward Williams Associates, Troy Planning + Design (on behalf of GMCA); June 2021