

Date: 8 August 2011
Our ref: LDF/Draft NPPF
Your ref:

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Dear Inspector,

Re: Joint Core Strategy and Development Management Policies Development Plan Document – Independent Examination – Draft National Planning Policy Framework

The council has prepared this statement in response to the Inspector's invitation to submit comments on the implications of the consultation draft National Planning Policy Framework (NPPF) on the Joint Core Strategy and Development Management Policies Development Plan Document (the Joint DPD).

This statement has been approved by the Executive Director for Economy, Place and Skills and the Cabinet Member for Housing, Transport and Regeneration.

The consultation draft NPPF sets out the Government's intentions for future planning policy, however it may be subject to further amendment before it is published as the final NPPF.

The council has prepared the Joint DPD in line with current legislative and procedural requirements. The council, however, is of the opinion the Joint DPD is in line with the Government's intentions as set out in the draft NPPF.

Key to the borough's future direction is recognising that economic growth and housing are intertwined, whilst at the same time ensuring appropriate and necessary environmental protections. The Joint DPD provides a positive planning framework for sustainable growth to support the future investment, development and regeneration of Oldham in line with national objectives. It helps our `address of choice` plans to provide enough quality homes for our local communities, and it delivers on our economic plans (such as Foxdenton) to promote sustainable growth that will deliver highly-skilled jobs. It is in line with the draft NPPF.

This statement sets out a commentary on the implications of the draft NPPF (in the order of the main headings in the consultation document) followed by commentary to address the specific housing-related points raised by the Inspector.

(The council submitted a response on how the Joint DPD relates to the Government's Planning for Growth statement (CD 410) that is considered pertinent to this response, particularly in respect of our economic and housing ambitions, although it is not repeated here.)

Draft NPPF heading	Comments
Delivering sustainable development	<ul style="list-style-type: none"> • The Joint DPD and the draft NPPF both use the Brundtland Commission’s definition of sustainable development. • Joint DPD paragraph 2.10 states “The LDF will address the borough’s future development needs, including housing, employment, education, leisure and open spaces. It has to take account of a wide range of issues that can sometimes be in conflict, however it will do so in ways that contribute towards the achievement of sustainable development and inclusive communities and adapts and mitigates the effects of climate change”. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Presumption in favour of sustainable development	<ul style="list-style-type: none"> • The Joint DPD sets out a positive and flexible planning framework for future investment, development and regeneration that meets the borough’s future economic, social and environmental needs in line with national objectives. • The spatial vision makes clear reference to sustainable development. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Core planning principles	<ul style="list-style-type: none"> • The Joint DPD sets out a long-term spatial vision, strategic objectives, planning and development strategy, policies and a monitoring and implementation framework. • The Joint DPD sets out a positive and flexible planning framework for future investment, development and regeneration that meets the borough’s future economic, social and environmental needs in line with national objectives and planning principles. • Key to the borough’s future direction is recognising that economic performance and housing are intertwined, whilst at the same time ensuring appropriate and necessary environmental protections. • We want to make the borough an address of choice. This will be through securing housing-led regeneration, reuse of brownfield sites and appropriate housing mix. Alongside improving our housing offer, we want to change our local economy with a shift towards low carbon industries and technologies. Improving prosperity will help address worklessness, tackle deprivation and promote well-being. • The council is of the opinion the Joint DPD is in line with this part of

	<p>the draft NPPF.</p>
<p>Plan-making – Local Plans</p>	<ul style="list-style-type: none"> • The Joint DPD is aspirational, but realistic. For example, as set out in our `address of choice` plans and our plans for improving skills and economic prosperity. • The Joint DPD sets out the borough's strategic priorities for all the matters listed in the draft NPPF through the strategic objectives and the Joint DPD policies. • The council is committed, as set out in the Local Development Scheme, to the preparation of a Site Allocations DPD to allocate specific sites to promote development once the Joint DPD has been adopted.
<p>Using a proportionate evidence base</p>	<ul style="list-style-type: none"> • The Joint DPD is based upon a credible and robust evidence base that is appropriate to Oldham's needs. Further details are set out in the Examination Library document list.
<p>Housing requirements</p>	<ul style="list-style-type: none"> • The Joint DPD housing policies, 3 `Address of Choice`, 10 `Affordable Housing` and 11 `Housing`, are supported by credible and robust evidence. Strategic Housing Market Assessments have been prepared for Greater Manchester (CD 240) and Oldham (CD 310). Strategic Housing Land Availability Assessments have been prepared (CD 307 and CD 308). • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
<p>Business requirements</p>	<ul style="list-style-type: none"> • The Joint DPD business and economic policies, 4 `Promoting Sustainable Regeneration and Prosperity`, 13 `Employment Areas`, 14 `Supporting Oldham's Economy` and 15 `Centres`, are supported by credible and robust evidence. This includes, amongst others, the Oldham Local Economic Assessment (CD 332), Greater Manchester Local Economic Assessment (CD 234), Greater Manchester Forecasting Model (CD 235), Manchester Independent Economic Review (CD 232), Oldham Rochdale Economic and Skills Alliance, ORESA, Prospectus (CD 327), Employment Land Review (CD 329), and Oldham Retail and Leisure Study (CD 330). A full list is provided in the Examination Library document listing. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
<p>Infrastructure requirements</p>	<ul style="list-style-type: none"> • The borough's infrastructure capacity and needs have been assessed in preparing the Joint DPD. An Infrastructure Study and Update have been prepared (CD 16 and CD 17). The Study has looked at physical, social and green infrastructure. The council has worked with a wide range of agencies on infrastructure, including the Highways Agency, the Environment Agency, and health and

	<p>education providers.</p> <ul style="list-style-type: none"> • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Minerals requirements	<ul style="list-style-type: none"> • The council is working with the other Greater Manchester local planning authorities to prepare a Joint Minerals DPD, JMDDP. The JMDDP is being prepared by the Greater Manchester Geological Unit. The Publication JMDDP is currently subject to consultation until 2 September 2011. Adoption of the JMDDP is scheduled for Autumn 2012. The JMDDP sets out the locations where mineral extraction may take place, the safeguarding of sensitive environmental features and of mineral resources with potential for future extraction, and all aspects of environmental and resource protection including the sustainable transportation of minerals. Joint DPD (Policy 8 `Sustainable Use of Resources – Minerals`) sets the context for the JMDDP. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Defence and national security	<ul style="list-style-type: none"> • The Ministry of Defence were consulted on the preparation of the Joint DPD at all stages of its preparation.
Environmental assessment	<ul style="list-style-type: none"> • The Joint DPD has been subject to Sustainability Appraisal (CD 6). Natural England supports the Sustainability Appraisal. • The Joint DPD has been subject to Habitats Regulations Assessment (CD 8). The HRA was prepared by the Greater Manchester Ecology Unit working collaboratively with Natural England. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Historic environment	<ul style="list-style-type: none"> • The Joint DPD is based on credible and robust evidence about the historic environment. This includes, amongst others, the Urban Historic Landscape Characterisation Study (CD 349) and the HMR Heritage Assessments (CD 350 to CD 354). • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Health and well-being	<ul style="list-style-type: none"> • The Joint DPD reflects the need to improve health and well-being of the borough's population. It reflects the work of the Sustainable Community Strategy (CD 278). The council has engaged with NHS Oldham during the preparation of the Joint DPD on improving health

	<p>as part of our approach to addressing the night-time economy, food and drink as expressed in Policy 15. (See letter from Preferred Options stage, CD 457). Health and well-being is also reflected through Policy 2 (‘Communities’).</p> <ul style="list-style-type: none"> • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Ensuring viability and deliverability	<ul style="list-style-type: none"> • Viability has been assessed as part of preparing the Joint DPD. For example, the Affordable Housing Economic Viability Assessment (CD 309) has looked at the potential implications that affordable housing would have on the viability of housing developments throughout the borough. • The council will be looking to put in place arrangements for the Community Infrastructure Levy. • Policy 25 (‘Developer Contributions’) explains that developer contributions will only be sought where it is financially viable and to do so would not prejudice delivery of the development. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Planning strategically across local boundaries	<ul style="list-style-type: none"> • Oldham has established strong working links with the other nine Greater Manchester local councils through the Association of Greater Manchester Authorities (AGMA). • The Greater Manchester Combined Authority was established in April 2011 to co-ordinate key economic development, regeneration and transport functions. • A business-led Greater Manchester Local Enterprise Partnership has been established. • Greater Manchester local authorities have worked collaboratively on spatial planning matters. This includes, amongst others, Strategic Floodrisk Assessment working with the Environment Agency (CD 363), Decentralised and Zero Carbon Energy Planning Study (CD 255), Green Infrastructure (CD 250), Strategic Housing Market Assessments (CD 240), and Assessing the Transport Implications of LDFs with the Highways Agency (CD 333). • The Transport Protocol (CD 266) forms a Memorandum of Understanding between the Highways Agency, AGMA and the ten Greater Manchester local authorities and sets out an agreed way forward on addressing transport and spatial planning matters. • Oldham Council is working with the other Greater Manchester local planning authorities and the Greater Manchester Geological Unit to

	<p>prepare a joint waste DPD and joint minerals DPD. This collaborative work recognises the cross-cutting nature of these spatial planning matters.</p> <ul style="list-style-type: none"> • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Examining Local Plans	<ul style="list-style-type: none"> • The draft NPPF sections about examining local plans and neighbourhood plans are noted.
Development Management	<ul style="list-style-type: none"> • The planning policy team and the development management section are based within the same council directorate (Economy, Place and Skills) within the Economy and Planning Division under the line-management of a Head of Planning and Infrastructure. • The council's adopted Statement of Community Involvement (CD 297, paragraphs 6.4 to 6.7) encourages pre-application discussions about development proposals so as to raise relevant issues, consider and develop better solutions and remove any delay to the formal planning processes. • The council has a Validation Checklist that was recently updated after consultation with developers and agents. • The draft NPPF sections about determining planning applications, tailoring planning control to local circumstances and neighbourhood development and community right to build orders are noted. • Policy 25 ('Developer Contributions') supporting text makes reference to the three planning tests and is in line with the draft NPPF. The supporting text, not the LDF policy, makes a short contextual reference to Circular 05/05, which is proposed to be cancelled by the draft NPPF, however this does not affect the Joint DPD.
Support economic development	<ul style="list-style-type: none"> • The Joint DPD sets out a positive and flexible planning framework for economic development. • A series of employment areas (titled 'Business and Employment Area', BEA and 'Saddleworth Employment Area', SEA) are identified in the Joint DPD. These set out a flexible approach to a wide range of commercial developments across the borough to support our improved economic growth and prosperity. • The Joint DPD (Policy 4 'Promoting Sustainable Regeneration and Prosperity) promotes and supports the development of a range of low carbon industries that contribute towards sustainable regeneration and prosperity. • The Joint DPD identifies an 'arc of opportunity' of key development

	<p>locations including Foxdenton, Hollinwood and Oldham Town Centre.</p> <ul style="list-style-type: none"> • Foxdenton will promote and support high quality business developments that will benefit the local and Greater Manchester economies and is in line with the draft NPPF (and current policy as well). • The Joint DPD (Policy 4, paragraph 5.50) states “a key objective of the borough's regeneration activities is to turn round the local economy by promoting and securing the development of knowledge based and innovative technologies and industries, so as to provide skilled and accessible jobs for local people”. • The Joint DPD (Policy 14 `Supporting Oldham’s Economy`) provides flexibility for alternative uses from those listed, including where there is no longer an economic imperative for the business to remain (demonstrated through a marketing or viability assessment) or where there are wider regeneration or community benefits. • The Joint DPD (Policy 14) includes reference to live/work units. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
<p>Promote the vitality and viability of town centres</p>	<ul style="list-style-type: none"> • The Joint DPD recognises that our Centres are at the heart of our communities. • The Joint DPD sets out details of our network and hierarchy of Centres including Oldham Town Centre and the Centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill. • The Joint DPD defines the boundaries of our Centres and appropriate and realistic primary shopping area / frontages. • The Oldham Retail and Leisure Study (CD 330) assesses the health and capacity of our Centres for new floorspace. • The council is committed, as set out in the Local Development Scheme, to preparation of a Site Allocations DPD that will allocate sites for specific uses. • The Joint DPD (Policy 15 `Centres`) makes clear that proposals for retail and leisure uses will be assessed in accordance with national policy – this approach is in line with the draft NPPF. • The Joint DPD (Policy 15) makes reference to the thresholds set out in national policy and the draft NPPF.

	<ul style="list-style-type: none"> • The removal of office development from 'town centre first' policy in the draft NPPF does not affect the Joint DPD, as the approach set out in the Joint DPD makes clear that such proposals will be assessed in accordance with national policy (which allows for flexibility should the national position change). • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Support the rural economy	<ul style="list-style-type: none"> • The Joint DPD supports the rural economy. The Joint DPD (Policy 4 `Promoting Sustainable Regeneration and Prosperity`) states the council will support diversification of the rural economy for business purposes. The UDP policy OE1.11 (`Farm Diversification`) has been saved to provide further policy on diversification. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Facilitate economic growth	<ul style="list-style-type: none"> • The Joint DPD sets out a positive planning framework to promoting accessibility and sustainable transport choices. • The council has worked with the Highways Agency and Transport for Greater Manchester to assess transport infrastructure requirements. • The Joint DPD (Policy 5 `Promoting Accessibility and Sustainable Transport Choices`) sets out how we will seek to shift traffic away from car use and reduce congestion by requiring developments, where appropriate, to assess their transport impacts. The Joint DPD sets out local standards for travel plans and transport assessments that are appropriate and realistic for Oldham. The Joint DPD does provide flexibility by clearly stating that such assessments will be required "where appropriate". • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Support reductions in greenhouse gas emissions and congestion	<ul style="list-style-type: none"> • The Joint DPD makes clear that new development should be located in sustainable and accessible locations. • The Joint DPD (Policy 3 `Address of Choice`) includes a section titled `Access to Key Services` that requires new residential development to be located in proximity to local services and facilities. • The Joint DPD (Policy 5 `Promoting Accessibility and Sustainable Transport Choices`) indicates that locally-specific parking standards to meet Oldham's needs shall be prepared. Until such time and where an application is for a land use not covered in the national policy, the council will determine the level of parking provision on an

	<p>case-by-case basis taking account of local circumstances.</p> <ul style="list-style-type: none"> • The Joint DPD (Policy 20 `Design`, criterion d) covers `ease of movement` and addresses the relationship between pedestrians and motorists. • The Infrastructure Study Update (CD 17, paragraph 2.20) highlights proposals for electric vehicle charging points. • The council is of the opinion the Joint DPD is in line with the draft NPPF.
<p>COMMUNICATIONS INFRASTRUCTURE - Facilitate the growth of communications infrastructure</p>	<ul style="list-style-type: none"> • The Infrastructure Study Update (CD 17, paragraph 2.23) provides details about the New Generation Broadband infrastructure that is being put in place here in the borough. • UDP Policy D1.12 (`Telecommunications`) that sets out how the council will assess planning applications for telecommunications has been saved. • The council is of the opinion the Joint DPD is in line with the draft NPPF.
<p>MINERALS - Secure an adequate supply of minerals & Facilitate sustainable use of energy minerals</p>	<ul style="list-style-type: none"> • See comments under `Minerals requirements` above.
<p>PLANNING FOR PEOPLE</p>	<ul style="list-style-type: none"> • The Joint DPD sets out the spatial planning and development strategy to deliver on our `address of choice` plans. This includes providing enough homes to meet the needs of our local communities and providing quality, choice and diversity. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
<p>Significantly increasing the supply of housing</p>	<ul style="list-style-type: none"> • See comments below.
<p>Deliver a wide choice of quality homes</p>	<ul style="list-style-type: none"> • The Joint DPD (Policy 11 `Housing`) promotes the delivery of a mixed housing stock. It is based on the findings of robust evidence including, amongst others, the Greater Manchester and Oldham Strategic Housing Market Assessments (CD 240 and CD 310) and Oldham's Affordable Housing Economic Viability Assessment (CD 309). This will ensure the needs and demands of the borough's urban and rural communities are met.

	<ul style="list-style-type: none"> • Highlights, based on our current local evidence, that there is particular need for: <ul style="list-style-type: none"> i) family housing, particularly within regeneration areas; ii) a mix of housing within Oldham Town Centre and the borough's other centres; and iii) high value housing throughout the borough (Policy 11). • The mix of housing required (including the size, type, tenure and range) on individual sites will be expanded on through the Site Allocations DPD where appropriate, including the number of affordable units required (Policy 10, paragraph 6.29). • The Joint DPD (Policy 10 `Affordable Housing`) sets out the council's approach to provision of affordable housing. This includes the circumstances in which affordable housing will be sought and that this will be, in the first instance, on-site, unless there are exceptional circumstances that would justify the acceptance, by the council, of off-site provision within the locality or a financial contribution in lieu of provision. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
DESIGN - Deliver high quality design	<ul style="list-style-type: none"> • The Joint DPD (Policy 20 `Design`) succinctly sets out the ten design principles that are appropriate, realistic and relevant to Oldham to deliver high quality design of new developments. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
SUSTAINABLE COMMUNITIES - Facilitate social interaction and inclusive communities & Deliver community facilities and local services & Deliver open space, sports and recreational facilities	<ul style="list-style-type: none"> • The Joint DPD supports the borough's diverse local communities. • Policy 2 (`Communities`) sets out how spatial planning can contribute towards sustainable communities and community cohesion. • Policy 20 (`Design`) sets out how design can ensure safety and inclusion, legibility, good streets and spaces and diversity. • The Joint DPD supports community facilities and services through Policy 2 and local shops through Policy 16 (`Local Services and Facilities`). • The Joint DPD (Policy 2) also sets out how spatial planning can help improve health and well-being by working with health providers. • The Joint DPD (Policy 2) also sets out how spatial planning can help improve education and skills, including by facilitating the development of new and improved schools.

	<ul style="list-style-type: none"> • The Joint DPD (Policy 3 `Address of Choice`, in the section titled `Access to Key Services`) seeks to ensure that new residential development is located in proximity to a range of services and facilities to help promote sustainable development and sustainable communities. • The Joint DPD (Policy 6 `Green Infrastructure` and Policy 23 `Opens Spaces and Sports`) sets out how spatial planning will deal with open spaces and sports matters. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
GREEN BELT - Designation of Green Belts	<ul style="list-style-type: none"> • The Joint DPD makes clear that maintaining our Green Belt boundaries is a key component of our planning and development strategy. This approach has been strongly supported throughout the preparation of the Joint DPD. The Joint DPD (Policy 22 `Protecting Open Land`) makes clear that development proposals in the Green Belt will be permitted in accordance with national policy, which accords with the draft NPPF.
Climate Change, flooding and coastal change	<ul style="list-style-type: none"> • The Joint DPD is based on credible and robust evidence to address climate change and flooding.
Support cuts in greenhouse gas emissions	<ul style="list-style-type: none"> • The Joint DPD (Policy 18 `Energy`) is supported by a credible and robust evidence base, including the Decentralised and Zero Carbon Energy Planning Study (CD 255). • The Joint DPD (Policy 20 `Design`) sets out relevant, appropriate and realistic design principles to ensure high quality design and construction of new developments. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Support the delivery of renewable and low-carbon energy	<ul style="list-style-type: none"> • The Joint DPD promotes `green` energy and adopts a proactive approach to renewable and low carbon energy. • The Joint DPD (Policy 18 `Energy`) supports the achievement of the zero carbon initiative. Policy 18 makes clear that developers will be expected to meet targets unless it can be clearly demonstrated that it is not financially viable and would prejudice the development. • The Decentralised and Zero Carbon Energy Planning Study (CD 255) forms part of the evidence base, and its findings will assist with development proposals. • The council is of the opinion the Joint DPD is in line with this part of

	the draft NPPF.
Minimise vulnerability to climate change and manage the risk of flooding	<ul style="list-style-type: none"> • The Joint DPD sets out an approach to mitigate and adapt to climate change and to manage floodrisk. Policy 1 (‘Climate Change and Sustainable Development’) sets out an overarching approach to this matter, and is further supported by other Joint DPD policies, particularly Policy 19 (‘Water and Flooding’). • Strategic floodrisk assessments have been prepared, working with the Environment Agency, AGMA and neighbouring boroughs. • The Environment Agency supports the Joint DPD. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Manage risk from coastal change	<ul style="list-style-type: none"> • Oldham is not a coastal planning authority.
NATURAL ENVIRONMENT	<ul style="list-style-type: none"> • The Joint DPD is supported by credible and robust evidence. This includes the Landscape Character Assessment (CD 357), the Urban Historic Landscape Characterisation Study (CD 349) prepared by the Greater Manchester Archaeology Unit (working with English Heritage), and the Habitats Regulations Assessment (CD 8) prepared by the Greater Manchester Geological Unit (working with Natural England). • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Protected valued landscape	<ul style="list-style-type: none"> • The Joint DPD is supported by credible and robust evidence. This includes the Landscape Character Assessment (CD 357) and the Greater Manchester Green Infrastructure Framework (CD 249). • Joint DPD (Policy 6 ‘Green Infrastructure’) sets out how spatial planning will promote and enhance the borough’s Green Infrastructure network, and Policy 21 (‘Protecting Natural Environmental Assets’) sets out further details including details of the relevant landscape objectives across the borough. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Minimise impacts on biodiversity and geodiversity	<ul style="list-style-type: none"> • The Joint DPD is supported by credible and robust evidence. This includes the Greater Manchester and Oldham Biodiversity Action Plans (CD 253 and CD 358). • The Joint DPD (Policies 1 ‘Climate Change and Sustainable Development’, 6 ‘Green Infrastructure’ and 21 ‘Protecting Natural Environmental Assets’) provides further details about how spatial

	<p>planning will address these matters.</p> <ul style="list-style-type: none"> • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
Preventing unacceptable risks from pollution and land instability	<ul style="list-style-type: none"> • The Joint DPD (Policy 1 `Climate Change and Sustainable Development` and Policy 9 `Local Environment`) address matters relating to, amongst other things, environmental quality, impacts on the environment and human health, amenity, pollution, air quality, safety and contaminated land. • The council is of the opinion the Joint DPD is in line with this part of the draft NPPF.
HISTORIC ENVIRONMENT - Conserve heritage assets & Contribute to knowledge and understanding of the past	<ul style="list-style-type: none"> • The Joint DPD is supported by credible and robust evidence. This includes the Urban Historic Landscape Characterisation Study (CD 349) that has been prepared by the Greater Manchester Archaeology Unit (working with English Heritage) and the former Housing Market Renewal Heritage Assessments (CD 350 to CD 354). • The Joint DPD (Policy 24 `Historic Environment`) sets out the spatial planning approach to heritage assets, including recognising the role of heritage-led regeneration to achieve economic, community and regeneration objectives and promote local identity.

HOUSING-RELATED POINTS RAISED BY THE INSPECTOR

1) ***Removal of the national minimum site size threshold for affordable housing***

The Joint DPD (Policy 10 `Affordable Housing`) applies the national minimum threshold set out in PPS3. It requires residential development of 15 dwellings and above to provide an appropriate level of affordable housing. The policy is informed by the findings of the Affordable Housing Economic Viability Assessment (CD 309). This will be monitored and reviewed over the lifetime of the LDF to ensure that it is still appropriate. Removal of the national minimum threshold would mean assessing proposals on a case by case basis considering the impact of delivering affordable housing on the economic viability of the development as already allowed through Policy 10.

2) ***Requirement to allocate an additional 20% of housing against the 5-year housing requirement***

The draft NPPF requires local planning authorities to identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements and include an additional allowance of at least 20%.

The council's Strategic Housing Land Availability Assessment (SHLAA) (CD 308) as at 1 April 2011 identifies:

- A five-year supply that contains 2,979 dwellings. This equates to a six year supply of deliverable housing land in the borough when taking into account the borough's housing requirements;
- That there is sufficient potential housing land supply (10,546 dwellings) within the borough. This is significantly more than the level of housing provision required across the borough (6,041) and represents an additional 75%.

The potential housing land supply identified in the SHLAA as at 1 April 2011 therefore provides sufficient flexibility to respond to changing circumstances (such as the new requirement set out in the draft NPPF), allow for choice and competition in the market for land and to ensure maintenance of a deliverable rolling five-year supply including an additional allowance of 20%. Furthermore, the SHLAA is a living document reviewed on an annual basis, providing an opportunity for the housing land supply to be amended and updated, including bringing sites forward from later phases where appropriate.

OTHER MATTERS

Removal of the brownfield target for housing development

The draft NPPF removes the national brownfield target for housing development. In relation to this matter, the council makes the following comments:

The Joint DPD (Policy 3 `Distribution of Housing`) requires at least 80% of housing provision to be on previously developed land. Whilst the draft NPPF proposes to remove the existing minimum target the council considers the approach set out in Policy 3 is still appropriate as it reflects:

- The existing requirement set out in RSS, which currently forms part of the development plan;
- A strategic priority of the Joint DPD is to ensure the effective and efficient use of land and buildings by promoting the reuse and conversion of existing buildings and development on brownfield land prior to the use of greenfield sites.
- The findings of the SHLAA (as at 1 April 2011) which shows that over 86% of the potential housing land supply is on brownfield land;
- That the focus for new housing within the borough is in sustainable and accessible locations (such as regeneration areas, areas within and accessible to the borough's other centres, and rural settlements, such as Saddleworth villages);
- That 60% of the potential housing land supply is in East / West Oldham and linked to regeneration areas (including Oldham Town Centre and the former HMR areas);
- The limited supply of available developable land within the borough, reflecting the Green Belt and borough's topography, which means the majority of land available for residential development will be on brownfield land as evidenced by the SHLAA.

It is considered that the council's approach reflects the aspirations of the NPPF which is to enable local councils to assess land for its suitability for development based on its characteristics and their needs.

CONCLUSIONS

The council is of the opinion the Joint DPD provides a positive and flexible planning framework for future investment, development and regeneration in the borough. It will help our `address of choice` plans to provide enough quality homes for our local communities. It will promote and support sustainable growth, including at Foxdenton, and improve skills to help address deprivation and worklessness. The council is of the opinion that the Joint DPD is in line with the Government's intentions as set out in the draft NPPF.

Yours sincerely

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