

PPE/731/68/1

24 May 2011

Oldham MBC
Programme Officer Linda Ford
Room 420A, Level 4
Civic Centre
West Street
Oldham
OL1 1UH



Dear Ms Ford

**RE: OLDHAM METROPOLITAN BOROUGH COUNCIL LOCAL DEVELOPMENT FRAMEWORK
JOINT CORE STRATEGY AND DEVELOPMENT MANAGEMENT POLICIES DPD**

On behalf of Goyt Properties Ltd, we submit the following written representations to Oldham Metropolitan Borough Council's Strategic Joint Core Strategy and Development Management Policies DPD Examination.

You will note from your records that we have previously submitted written representations on behalf of our client in November 2010.

We now submit further representations for the Inspector's consideration.

Policy 10

We previously raised concerns about the apparent disconnection between the 451 dwelling shortfall in housing provision and the requirement for new residential development to contribute 7.5% of sales value to the provision of affordable housing. We remain concerned that the introduction of such a contribution (and associated threshold) will not assist the Council in providing the required number of dwellings or in closing the shortfall in housing provision.

We note that Oldham already has one of the most affordable housing markets within Greater Manchester¹, with average house prices significantly below the Greater Manchester and National Averages, with terraced accommodation available, on average, for around £97,000.

Having regard to the above, we consider the requirement of Policy 10 to contribute 7.5% of the sales value of all sites over 15 dwellings to the provision of affordable housing to be unreasonable.

¹ Land Registry of England and Wales (October to December 2010)



We note from the Council's 'Planning for Growth' response to the Inspector on 26 April 2011, that the Council now recognise that when it comes to developer contributions, including affordable housing, there is a requirement to take a flexible approach, in order to ensure development is not frustrated.

We ask that the wording, threshold and caveats in this policy are amended to reflect the Council's position in its 'Planning for Growth' statement and to reflect our previous representations on this policy.

Policy 13

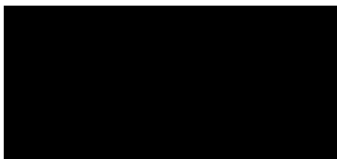
We continue to support the removal of ten of the UDP Primary Employment Areas (PEZs), from this designation and their reallocation for other uses, in particular the de-designation of:

- PEZ9: Fields New Road, Chadderton; and
- PEZ19: Greenacres Road, Waterhead.

Both of these sites offer key opportunities for alternative uses, such as residential, retail and leisure which will bring regeneration benefits.

I look forward to receiving confirmation of your receipt of this letter and to our representations being taken into account by the Inspector when he considers the matters in due course.

Yours sincerely



Paul Entwistle MTCP MRTPI
Senior Planner - Rapleys LLP

