

NJ/731/68/1

18 August 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 – COMMENTS
ON IMPLICATIONS OF NPPF**

On behalf of Goyt Properties Ltd, we submit the following representations on the implications of the Draft National Planning Policy Framework on Oldham Metropolitan Borough Council's Strategic Joint Core Strategy and Development Management Policies DPD.

You will note from your records that we have previously submitted written representations on behalf of our client in November 2010 and May 2011.

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

Affordable Housing

We continue to express our concern over the affordable housing provision requirement for affordable housing within Oldham. We are of the view that given the poorly performing residential development market within Oldham and the affordability of the Borough, there should not be the requirement to provide a contribution towards affordable housing. We consider that this will have the effect of discouraging residential development within the Borough, further reducing the Council's ability to plug the housing shortfall.

In terms of the draft proposals within the NPPF to allow local authorities to set their own thresholds for affordable housing, in the context of Oldham, we are of the view that the current proposed threshold of 15 dwellings is already too high for the reasons outlined above and the likely impact it would have on the viability of bringing smaller sites forward for development. We therefore object to any proposal by the Council to further reduce the affordable housing threshold.



A lower threshold would not be appropriate in an area such as Oldham and would not be in accordance with the NPPF objective of seeking to significantly increase housing development numbers.

5-year Housing Land Supply + 20%

We note that the April 2011 SHLAA identifies sites suitable to accommodate approximately 6 years supply of housing land. The Core Strategy is therefore broadly in accordance with the proposed changes to present in the NPPF as to how housing land supply should be dealt with.

However, we also note that there are a significant number of the sites identified within the SHLAA that are suitable to accommodate fewer than 15 dwellings. Under the current draft Core Strategy policy, these sites would not be required to provide a contribution towards affordable housing. If the Council should seek to reduce the affordable housing threshold in response to the NPPF, then we would suggest that the SHLAA and housing land supply figures should be revisited, as such small sites may no longer be developable/deliverable with the additional burden of affordable housing contributions.

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



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