

Oldham

Local

Development

Framework

**Final Employment Land Review
Schedule of Representations
and Responses**

March 2010



Oldham
Council

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1. Introduction

Between November and December 2008 the council consulted on the Employment Land Review (ELR).

As part of the preparation of the LDF, Oldham Council carried out an ELR to help create robust and informed employment land policies. The report reviews the existing employment land allocations, forecasts the need for new employment land over the plan period, and considers whether new employment allocations should be made and/or any existing sites have the potential to be de-allocated.

The report was available for comment on the council's website and on the Limehouse consultation portal, at local libraries, at Access Oldham and the Planning Reception in the Civic Centre, and at Oldham Business Centre. Statutory consultees and groups and individuals on the LDF mailing list were notified of the consultation. A press release was also issued.

2. Summary of Representations

This report sets out details of the representations that were received on the Employment Land Review report. A total of five respondents sent in 24 comments. Copies of the actual submitted comments can be viewed via the Limehouse portal. The responses indicate how the council will amend the Employment Land Review, where appropriate, in preparing the Final Employment Land Review.

A summary of responses shows that:

- The majority of comments were submitted by the Highways Agency (46%) and Brookhouse Group Ltd (38%)
- The majority of comments came from outside the borough (88%)

3. Summary of Key Messages from the Consultation

The following section summarises some of the key messages that came out of the consultation.

- Methodologies used should meet the circumstances specific to Oldham and not just apply a Regional or sub-regional methodology.
- Reference should be made to all the listed economic activities in draft PPS 4 including, retail, leisure and offices, housing, high technologies premises.
- Reference should be made to the financial down turn, e.g. how this affects Oldham and the commercial property market
- The appraisal of existing employment sites should be revisited to account for the most recent development positions.
- The consideration of additional sites will need to be appraised with due regard to the traffic implications of large scale developments.
- In the initial work carried out by Donaldsons, Market Attractiveness is given a higher weighting than Sustainable Development. There would be concern from the Highways Agency if the principles of PPG13 were not upheld and promoted.
- Oldham Council should actively seek to ensure public transport services are improved by liaising with organisations and authorities.
- Consideration should be given to the opportunity for Travel Planning measures, Transport Assessments and appropriate mitigation measures.
- Evidence base is needed which identifies the implications of development in terms of the Strategic Road Network and the local roads.

4. Next Steps

The council's response to the comments received are set out below. The council's response and the Employment Land Review as amended, will be considered by the Executive Director and Cabinet Member for Environment and Infrastructure for approval. Following approval, the amended Employment Land Review will be published on the council's website.

Full Name	Company / Organisation	Comment Display Prefix	ID	Comments - Please use this box for any comments you would like to make on the Employment Land Review document.	Council's Response - Council's Response
John Pilgrim	Yorkshire Forward	ELR	3	We do not have any comments to make on the consultation. We look forward to future opportunities for involvement in the ongoing LDF preparation process.	Comment noted.
Andrew Brown	Brookhouse Group Ltd	ELR	4	Chapter 4 - Key policies, plans and strategies. The ELR should make clear reference and provision for all the listed economic activities in draft PPS 4 including: - Retail, leisure and offices, in offices and town centres and other locations; Housing; and, High technologies premises.	Since the publication of Oldham's Draft Employment Land Review PPS4: Planning for Sustainable Economic Growth has been published. Reference to the document has been included within Chapter 4 Key policies, plans and strategies. It should also be noted that the ELR does not consider retail or leisure development this has been dealt with in Oldham's Retail and Leisure Study. Similarly the Employment Land Review does not consider housing developments; this is dealt with in the Strategic Housing Land Availability Assessment.
Andrew Brown	Brookhouse Group Ltd	ELR	5	Chapter 4 - Key policies, plans and strategies Reference to RSS should also include other regeneration objectives for the Region including those set out in Policies DP1 - 9 and Policies RDF 1 - 4. Reference should also be made to RSS Policies W5: Retail Development, W6: Tourism and the Visitor Economy and W7: Principles of Tourism Development.	The ELR has only made reference to the policies within RSS that relate specifically to employment land. The ELR does not consider retail or leisure development as this has been dealt with in Oldham's Retail and Leisure Study. Similarly the ELR does not consider tourism development.

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Andrew Brown	Brookhouse Group Ltd	ELR	6	<p>Chapter 5 - Guidance and Research on Employment Land Reviews</p> <p>It is appropriate to reference the methodologies and documents in the Draft ELR, however it should meet the circumstances specific to Oldham and not just apply a Regional or sub-regional methodology. It should also cross refer other national & regional policies that are acknowledged as being generators of economic activity.</p>	Three methods were initially used in the report to forecast future employment land requirements and the three methods came up with varying results. It was considered appropriate to use a combination of the methods by taking historic take up rates, projecting them forward and then adjusting the figure based on the proportionate change in B-use employment generated through the Greater Manchester Forecasting Model. Any national and regional policies considered relevant to the Employment Land Review have been included.
Andrew Brown	Brookhouse Group Ltd	ELR	7	<p>Chapter 6 - Qualitative Demand Analysis</p> <p>Rental and yield values will need to be reviewed to account for the changes in the commercial property market resulting from the financial down turn, along with an explanation of how the down turn will affect Oldham. A further review of demand is required to account for the likely reduction in speculative commercial development & potential increase in the rate of vacancy.</p>	Comments noted. Reference to the most recent rental and yield values will be included in the Final ELR, along with the most up to date information held on vacancy rates and demand.
Andrew Brown	Brookhouse Group Ltd	ELR	8	<p>Chapter 6 - Qualitative Demand Analysis</p> <p>The Draft ELR notes there is high demand for smaller freehold accommodation - emerging policy should ensure provision is made for this sector and not restrict development of secondary or tertiary unallocated commercial sites where proposals accord with other regenerations objectives.</p>	Comments noted. The LDF will look to provide employment land provision for varying sectors and businesses of varying sizes as part of the Site Allocations DPD.

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Andrew Brown	Brookhouse Group Ltd	ELR	9	Chapter 7 - Current Supply of Employment Sites The appraisal of existing employment sites should be revisited to account for the most recent development positions. See letter attached.	The development status of existing employment sites is updated on an annual basis as part of employment land monitoring, when producing the Final ELR the most recent information on employment sites will be included.
Andrew Brown	Brookhouse Group Ltd	ELR	10	Chapter 7 - Current Supply of Employment Sites The development potential of Land Reserved for Future Development (LRDF) 3 and 4 and the areas immediately adjoining them Other Protected Open Land (OPOL) 3 and the Recreational Open Space are accepted as having mixed use development potential including commercial, housing, education and community uses.	Comment noted.
Andrew Brown	Brookhouse Group Ltd	ELR	11	Chapter 8 - Quantitative Employment Land Demand Issues The view that there will be a shortfall in employment land provision is supported.	Comment noted.
Andrew Brown	Brookhouse Group Ltd	ELR	12	Chapter 9 - Addressing the Shortfall of Employment Land Indicative masterplans for Land Reserved for Future Development (LRFD) 3 and 4 at Foxdenton and the adjoining areas of Other Protected Open Land (OPOL) have been submitted as part of the LDF. It is considered that this draft masterplan be taken forward as the basis for a mixed use development.	Comment noted. A Promotional Statement was submitted to the council for Land Reserved for Future Development (LRFD) 3 and 4 at Foxdenton and the adjoining areas of Other Protected Open Land (OPOL). It provides an overview of the site and outlines a summary of the potential development of the site.

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Victoria Ridehaugh	Highways Agency	ELR	13	The emerging theme is that there will be a shortfall in employment land provision. As acknowledged in the report the calculated figure should not be taken as a defined requirement but considered against increased density in office developments, opportunities in neighbouring strategic regional sites and the reduction in demand identified in two of the methodologies.	Comment noted. A piece of work has been completed on a Greater Manchester-wide Position Statement on employment land. It has been agreed by each of the 10 districts to serve as part of the evidence base for Local Development Frameworks. It gives an understanding of the spatial distribution of the overall Greater Manchester portfolio of employment land and how this fits with the Regional Spatial Strategy employment land requirements and policies for the Manchester City Region.
Victoria Ridehaugh	Highways Agency	ELR	14	The consideration of additional sites, including Foxdenton, will need to be appraised with due regard to the traffic implications of large scale development to address the identified imbalance between demand and supply. Development should not have avoidable material impact on the Strategic Road Network.	Comment noted. Oldham Council are working with the Highways Agency to address this part of the evidence base, including work on the AGMA transport modelling that is currently underway.
Victoria Ridehaugh	Highways Agency	ELR	15	The report discusses traffic patterns and density of development associated with different use classes of development. It is important to emphasise that whilst 'B1 office use' may allow small sites to be developed at much greater densities, they often have higher trip densities especially during peak hours. The identification of employment land should also discuss what type of development can be accommodated and if there is an opportunity to promote mixed use schemes.	Comment noted. The Greater Manchester Employment Land Position Paper explores the concept of 'landless growth' and the conclusions for Oldham are that the redevelopment of brownfield sites at higher densities is likely to be a pre-requisite if the borough is to achieve its goal of encouraging new hi-tech industries to locate in the district. Oldham Council are working with the Highways Agency on the AGMA transport modelling that is underway and assesses the transport impacts of LDF proposals. Uses permitted on new employment land will be

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					further explored in the Site Allocations DPD.
Victoria Ridehaugh	Highways Agency	ELR	16	The preferred methodology for land requirement appears to have been undertaken on sound principles but careful consideration will need to be applied to the allocation of existing and proposed sites with due regard to the 'quality standards' particularly sustainability. The shortfall identified in employment land is unlikely to be deliverable especially given the competing pressures for housing provision and the amount of protected land in the borough.	Comment regarding 'sound principles' noted. Sustainability Appraisals are undertaken at various stages of the Local Development Framework therefore any sites proposed for allocation will have been appraised for their sustainability.

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Victoria Ridehaugh	Highways Agency	ELR	17	<p>The initial work by Donaldsons outlined that there was a shortfall in good quality sites when assessed against sustainability, market attractiveness & strategic planning. Market Attractiveness is given a higher weighting than Sustainable Development. The Agency acknowledges the competing pressures but would be concerned if the principles of PPG13 were not upheld and promoted from the offset. Immediate access to the Strategic Road Network should not necessarily be given as a positive Market Attractiveness factor when it is likely to contrast to a separate factor under Sustainable Development criteria.</p>	<p>When Donaldsons carried out the site appraisals, the consultants opinion was that it was appropriate to give market attractiveness the highest weighting due to the competition for employment development and the scale and nature of competing sites in the area. However, in light of the comment from the Highways Agency and other emerging pieces of work it may now be appropriate to update the scoring mechanism used by Donaldsons to assess the sites and ensure that the three criteria are given appropriate weighting.</p>
Victoria Ridehaugh	Highways Agency	ELR	18	<p>The Agency has previously provided all the authorities of the North West with a copy of the Regional Network Report which also contains 'Stress Maps' to illustrate where the Strategic Road Network experiences particular pressures. This is a good indicator as to where the network is likely to experience delays and where additional consideration should be given to the location of developments which could produce a cumulative increase in traffic. Map attached (figure 1.2).</p>	<p>Comment noted. We will have regard to the 'Stress Maps' in taking forward our Local Development Framework.</p>

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Victoria Ridehaugh	Highways Agency	ELR	19	The Agency would welcome information which breaks down the proposed employment (and residential) sites so the developments can be reviewed using appraisal software. This software allows for likely traffic generations to be distributed across the local and national network, providing the basis for further capacity assessment.	Comment noted. This information has now been provided to the Highways Agency as part of the AGMA transport modelling work.
Victoria Ridehaugh	Highways Agency	ELR	20	The need for sustainable development is one of the principles behind the LDF process and the Agency needs to be satisfied that Oldham council is furthering the overarching policy with regard to the Strategic Road Network. Whilst sites come forward it is important that the appraisal process acknowledges the opportunity to bring forward mixed use developments. Oldham has the chance to capitalise on the opportunities associated with Metrolink to bring forward development in locations well served by public transport.	Comment noted. All sites will be appraised against a number of criteria, including access to public transport, to assess their suitability for the most appropriate type of uses, which may include mixed uses.

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Victoria Ridehaugh	Highways Agency	ELR	21	The report identifies the strategic regional sites in the neighbouring authorities but concerns relating to commuting patterns and public transport failings are raised. Oldham Council should actively seek to ensure services are improved by liaising with organisations and authorities. Accessibility factors should be considered under the theme of sustainable development, access to key services should be explored when considering employment and housing allocations. The presence of the Greater Manchester Air Quality Management Area should also be acknowledged when identifying sites for future development. See letter attached.	Comment noted. Oldham Council is liaising with neighbouring authorities to ensure public transport services are established to strategic regional sites, through the Local Transport Plan programmes, work with Oldham and Rochdale Economic and Skills Alliance (ORESA) and any other opportunities that arise. All sites will be appraised against a number of criteria, including access to services, access to public transport and air quality.
Victoria Ridehaugh	Highways Agency	ELR	22	Consideration should also be given to the opportunity for Travel Planning measures, Transport Assessments and appropriate mitigation measures. Where improvements to the highway network are necessary consideration should also be awarded to the use of conditions and Section 106 agreements. Improvements to the Strategic Road Network as a result of the impact of development should only be considered as a last resort. The focus should be on sustainable site selection.	<p>Comment noted. Oldham Council currently require Travel Plans and Transport Assessments based on the thresholds within DfT's 'Guidance on Transport Assessments' (2007), as well as in situations where it is felt that there is a local traffic problem. Subsequently monitoring and enforcement of these conditions and Travel Plans submitted is undertaken periodically.</p> <p>Within our Refining Options document we have a policy called, Promoting Accessibility and Sustainable Transport Choices which states that the council will require new developments to be accompanied by a Travel Plan and Transport Assessment where appropriate. Any sites selected for development will need to be subject to a sustainability appraisal to ensure that they are in a sustainable location.</p>

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Victoria Ridehaugh	Highways Agency	ELR	23	The Agency is keen to see an evidence base presented which identifies the implications of development in terms of the Strategic Road Network and the local roads which could have implications for the M60, M62, A663 and the A327(M). The absence of such information does not allow the Agency to fully comment at this stage on the validity or content of the review. To conclude, any forthcoming development sites must be brought forward with sufficient evidence to show a thorough appreciation of the transport implications.	Comment noted. Oldham Council are working with the Highways Agency to address this part of the evidence base, this includes working together on the AGMA transport modelling work which assesses the transport implications of LDF proposals.
Money Controls Ltd	HOW Planning Ltd	ELR	24	Money Controls supports Donaldsons and the council's recommendation to de-allocate the existing Business and Industry allocation at New Coin Street. Property consultants have been instructed by Money Controls to assess the marketability and viability of future employment uses which will be submitted with a forthcoming planning application.	Comment noted.
Money Controls Ltd	HOW Planning Ltd	ELR	25	The Draft ELR indicates there is a shortfall in the supply of employment land in the borough. It is considered that take up rates across Oldham will considerably drop due to the current downturn in the financial property market so the position presented in the report is not entirely accurate. As a result there is not the under supply of employment land presented by the council in the Draft ELR.	Comment noted. The Draft Employment Land Review was completed in Autumn 2008 with a lot of the data available from the previous year (vacancy rates, GMFM etc). Reference will be made to the economic downturn in the final Employment Land Review, however this piece of evidence base is for the Core Strategy which is a long term document (up to 2026) so it has to take the long term view of the needs of the borough.

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JD Williams and Company Ltd	Turley Associates	ELR	26	<p>The key conclusion that is of interest to our client is that land in our clients ownership at Beal Lane in Shaw has been deemed to have, "no prospect of being taken up in the next 5-10 years". Our client strongly disagrees with the conclusion in relation to the site and considers the reasoning on which the conclusion is based is flawed. There has been two recent planning applications submitted by our client that have been refused on design/visual impact rather than on principle of development, so the conclusion that there is no prospect of the site being taken up seems illogical. We request that the recommendation in respect of the Beal Lane site be rejected and that it be retained as an employment land allocation. We also ask the council review the Draft ELR taking into account the needs of exiting businesses to grow and expand.</p>	<p>Comments noted. The development status of existing employment sites is updated on an annual basis as part of employment land monitoring, when producing the final Employment Land Review the most recent information on employment sites will be included.</p> <p>With regards to the Beal Lane site specifically, the site was looked at by Donaldsons before any application had been submitted on the site and they considered the site to have no prospect of being taking up. The application submitted (that has now been refused at appeal) has demonstrated that the site does have the potential of being taken up and Donaldsons recommendation will be reconsidered.</p>