

**OLDHAM METROPOLITAN BOROUGH COUNCIL**

**LOCAL DEVELOPMENT FRAMEWORK**

**ASSESSMENT OF EMPLOYMENT SITES  
SUPPLEMENTARY PLANNING DOCUMENT**

**FINAL CONSULTATION STATEMENT**

**Adopted on 29<sup>th</sup> October 2007  
by  
Oldham Metropolitan Borough Council**

**OLDHAM**   
*Metropolitan Borough* 



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*The Council will arrange for this document to be made available in alternative formats including large print, electronically, and community languages if requested, and if appropriate. Please ring 0161 770 4151, 4163 or 4139 for further information*

पिनंती करवाथी, काउन्सिल द्वारा आ दस्तावेज विविध रूपमा उपलब्ध करवामां आवथी. ए।त., मोटा छापेलां अक्षरोमां, सीडी के ओडियो टेप पर अने विविध समाजनी भाषाओनी समावेश थाय छे. कृपा करी, वधारे माहिती माटे, 0161 770 4151, 4163 अथवा 4139 नंवर पर कूल करी.

काउन्सिल, এই दलिलটিকে अनुरোধ সাপেক্ষে এবং যদি উপযুক্ত হয়-অন্যান্য ভাবে পাওয়ার ব্যবস্থা করবে, যার অন্তর্ভুক্ত হল বড় অক্ষরে, ইলেকট্রনিকভাবে এবং কমিউনিটির বিভিন্ন ভাষায়। দয়া করে আরও বিস্তারিত তথ্যের জন্য টেলিফোন করুন 0161 770 4151, 4163 অথবা 4139 এই নম্বরগুলোতে।

اگر مانگ ہوئی اور مناسب ہو تو کونسل اس دستاویز کو موٹی لکھائی، ٹیپ یا سی ڈی وغیرہ اور کمیونٹی کی زبانوں میں بھی فراہم کرنے کا انتظام کرے گی۔ مزید معلومات کیلئے 0161 770 4151 یا 0161 770 4163 یا 0161 770 4139 پر فون کریں۔

## **1. Introduction**

- 1.1 The Council is required to prepare its Supplementary Planning Documents (SPDs) in accordance with procedures set out in the Town and Country Planning (Local Development) (England) Regulations 2004. Regulation 17 requires that, before an SPD is adopted, a Consultation Statement be prepared setting out who was consulted in connection with the preparation of the SPD, how they were consulted, a summary of the main issues raised in those consultations and how those issues have been addressed in the SPD.
- 1.2 The SPD has also been prepared and consulted upon in accordance with the Council's adopted Statement of Community Involvement (SCI).

## **2. Consultation on the draft SPD**

- 2.1 The draft SPD was drawn up by officers in the Council's Environmental Services Directorate (Environmental Protection section) and Regeneration Directorate (Strategic Planning and Information Team and Property Development and Investment sections). The aim of the SPD is to provide guidance on the implementation of UDP policies B2.1 and B2.2 which sets out the views of Oldham MBC on how it will assess planning applications for the development of residential and/or community uses on sites in Primary Employment Zones (PEZs) and existing employment sites outside PEZs, which itself was subject to consultation and Sustainability Appraisal as part of the UDP review process (2000-2006).
- 2.2 As required by the Planning and Compulsory Purchase Act 2004, the Council carried out a Sustainability Appraisal alongside the preparation of the draft SPD. This process incorporated the requirements of the European Commission Directive 2001/42/EEC, which requires a Strategic Environmental Assessment of SPDs. The first stage of this process was the production of a Scoping Report. This involved an initial evidence gathering exercise and the identification of Plan and Sustainability Objectives. The Scoping Report is included as Appendix 1 to the Sustainability Appraisal, which is available for consultation alongside this draft SPD.
- 2.3 As part of the Scoping Report process the Council consulted the Environment Agency, Natural England, English Heritage, Government Office North West, Oldham Partnership, North West Regional Assembly, MIDAS, Manchester Enterprise, Greater Manchester Chamber of Commerce and the Northwest Regional Development Agency by letter. This consultation was carried out for five weeks between 15 January and 19 February 2007.

- 2.4 Appendix 1 of this document summarises the comments received and the Council's responses.
- 2.5 The Council also carried out an Equalities Impact Assessment on the draft SPD in order to assess the potential impact of the SPD on the various equalities categories in the Borough. This was carried out by officers in the Strategic Planning and Information section on 21 May 2007. The resulting document is available for consultation alongside this draft SPD.
- 2.6 The Council also carried out a Habitats Regulations Assessment as required under Article 6(3) and 6(4) of the Habitats Directive as implemented by the draft Habitats Regulations 2006. This involved an ongoing period of consultation with the Greater Manchester Ecology Unit and Natural England. A copy of this Assessment is available for consultation alongside this draft SPD.

### **3. Formal Public Consultation**

- 3.1 The draft SPD was subject to a period of formal consultation from 19 June 2007 to 5pm 31 July 2007.
- 3.2 Appendix 2 contains a list of specific Consultation Bodies and Government Departments that will be invited by letter or email to comment on the draft SPD and its supporting documents.
- 3.3 Appendix 3 contains a list of other Consultees that will be invited to comment on the draft SPD and its accompanying documents.
- 3.4 A public notice was published in the Oldham Evening Chronicle on 19 June 2007 and a press release with details of the SPD was issued.
- 3.5 The draft SPD and its supporting documents were available on the Council's website: [www.oldham.gov.uk](http://www.oldham.gov.uk)
- 3.6 The draft SPD and its supporting documents and comments forms were available at public libraries, the Civic Centre One-Stop Shop and Level 12 Planning Reception and Oldham Business Centre.
- 3.7 All Oldham MBC Councillors and the Oldham Partnership were sent an electronic copy of the draft SPD and its supporting documents.
- 3.8 A letter or email was sent to those individuals and organisations on the LDF mailing list, and those that had expressed a particular interest in the draft SPD, explaining that the document was available for consultation.

#### **4. Response to Consultation**

4.1 Appendix 4 contains a summary of the representations received to the draft SPD, and its supporting documents, and the Council's response.

Appendix 1

**Consultation on the Scoping Report – Comments received and Council’s Response**

| <b>Respondent</b>                     | <b>Issue</b>   | <b>Council Response</b>  |
|---------------------------------------|--|--|
| Government Office North West          | GONW do not wish to offer any comments.  | Noted.   |
| English Heritage                      | Paragraph 5.1 sets out the plan objections and includes making better use of vacant and underused land and buildings. There is a potential for these buildings and sites to have some historic, architectural or archaeological interest. The appraisal should enable the assessment of this interest and therefore the inclusion of an objective covering the historic environment should be considered. This would also apply to the identification of new sites for employment. | Sustainability objective C “To realise the maximum benefit of derelict land and buildings” will take account of the fact that the sites and buildings could have historic, architectural or archaeological interest. |
| Northwest Regional Development Agency | Pleased to see the inclusion of 2006 Regional Economic Strategy. Would like to make reference to RES Action 84, which recognises that not all brownfield sites will be suitable for employment use and looks to develop alternative uses.  | The Scoping Report has been amended to include RES Action 84 in the review of plans and policies.  |

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| <p>North West Regional Assembly</p> | <p>RPG13 forms an integral part of the development plan and should be given due consideration in producing SDP's and SA's. In addition the Draft RSS has now undergone a number of periods of consultation with an Examination in Public, which ended on 15<sup>th</sup> February 2007. As it is progressing towards adoption, it should be given some consideration when forming new policy documents and included in Table 1.</p> | <p>RPG 13 and Draft RSS 13 are both included in Table 1 already.</p>   |
|                                     | <p>Table 1 includes PPG 3 and PPS 3, however as PPS3 was published in November 2006 PPG3 should be removed as it is superseded.</p>   | <p>Noted, however when the Scoping Report was consulted on, PPG 3 was still a valid document, so both documents were included.</p> |

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| <p>Natural England</p> | <p>Natural Environment and Rural Communities (NERC) Act states: “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.” Natural England states that we may wish to make this obligation clearer within the document.</p> <p>Other documents to include:</p> <p>PPS7 – Sustainable Development in Rural Areas</p> <p>PPS 9 Biodiversity and Geological Conservation</p> <p>‘Environmental Quality in Spatial Planning’</p> <p>‘The Countryside In and Around Towns’</p> <p>‘Landscape Character and Assessment Guidance for England and Scotland’</p> <p>‘Countryside Character, Volume 2: North West England’</p> <p>‘Greater Manchester Biodiversity Action Plan’</p> <p>‘Draft Greater Manchester Geodiversity Action Plan’</p> | <p>Natural England makes reference to the fact that the document is perceived to lack environmental focus from their perspective. The Council’s response is that the draft SPD relates to two specific policies B2.1 and B2.2, which are economic and social in nature. The UDP recognises the importance of the environment, within the Borough, and has specific policies relating to this area of planning, particularly in the Open Environment Chapter of the UDP. It is not proposed to include the suggestions as specific objectives, indicators, or issues for the Assessment of Employment Sites SPD.</p> |
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|  | <p>In paragraph 3.3 it should be added that the South East of Oldham Metropolitan Borough lies within the Peak District National Park. And add reference to the Rochdale Canal SSSI.</p>                          | <p>Noted, this has been added to the draft SPD.</p>  |
|  | <p>Table 2 is void of any environmental data; Natural England can provide information on a number of environmental interests.</p>   | <p>The UDP recognises the importance of the environment, within the Borough, and has specific policies to cover this area. It is not proposed to include the suggestions as specific objectives, indicators, or issues for the Assessment of Employment Sites SPD.</p> |
|  | <p>The Scoping Report states that 'Employment Development in the Borough should continue to be located on brownfield sites'. Natural England ask that Oldham recognises the Biodiversity value of such sites.</p> | <p>Noted. The UDP recognises the importance of the environment, within the Borough, and has specific policies to cover this area.</p>  |

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|  | <p>Natural England are concerned at the lack of environmental objectives, particularly with the proximity of the Rochdale Canal to many existing and proposed employment sites.</p>   | <p>The UDP recognises the importance of the environment, within the Borough, and has specific policies to cover this area. It is not proposed to include the suggestions as specific objectives, indicators, or issues for the Assessment of Employment Sites SPD. The draft SPD makes reference to the Rochdale Canal and advises potential developers to liaise with the Greater Manchester Ecology Unit.</p> |
|  | <p>Natural England would welcome the inclusion of data, issues, objectives and indicators for conservation and enhancement of Biodiversity; conservation and enhancement of Landscape and Townscape; and provision, conservation and enhancement of green infrastructure, open spaces and access to them.</p> | <p>The UDP recognises the importance of all of those listed within the Borough, and has specific policies to cover those areas. It is not proposed to include the suggestions as specific objectives, indicators, or issues for the Assessment of Employment Sites SPD.</p>   |

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| <p>Environment Agency</p> | <p>PPS25 Development and Flood Risk Annex F Surface Water Drainage and Sustainable Drainage Systems (SUDS) should be included. The Environment Agency encourage the use of SUDS where practical are they are significant in the process of delivering sustainable urban development.</p> | <p>The Environment Agency ask that SUDS be taken into account in the SPD. The UDP covers Water Run-off and Sustainability in policy NR2.4 of the UDP It is not proposed to include PPS 25 in the Assessment of Employment Sites SPD.</p>  |
|                           | <p>PPS 23 Annex 2, Development of land affected by Contamination. Consideration needs to be given to addressing any issues of contamination that may arise when making the best use of industrial land.</p>  | <p>The Environment Agency ask that Contamination issues be taken into account in the SPD. The UDP covers Contaminated Land in policy NR1.6 of the UDP and is producing a specific SPD covering the issues raised. It is not proposed to include PPS 23 in the Assessment of Employment Sites SPD.</p> |

## Appendix 2

### **Specific Consultation Bodies and Government Departments to be consulted on the draft SPD**

The following specific consultation bodies were consulted by the Council, in accordance with the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Development) (England) Regulations 2004 and the Council's adopted Statement of Community Involvement:

- The Regional Planning Body (North West Regional Assembly)
- The Environment Agency
- The Historic Buildings and Monuments Commission for England (English Heritage)
- Natural England
- The Highways Agency
- Local Planning Authorities, County Councils or Parish Councils, any part of whose area is in or adjoins the Borough
- A Regional Development Agency whose area is in or adjoins the Borough
- Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3) (a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the area of the Borough
- The Strategic Health Authority
- A person to whom a licence has been granted under the Section 6(1)(b) or (c) of the Electricity Act 1989
- A person to whom a licence has been granted under Section 7(2) of the Gas Act 1986
- A sewage undertaker
- A water undertaker

### **Government Departments**

The **Government Office for the North West** was consulted by the Council and was the first point of contact for consultation with the following Government Departments:

- Department for Communities and Local Government (DCLG)
- Department for Culture, Media and Sport (DCMS)
- Department for Education and Skills (DfES)
- Department for Environment, Food and Rural Affairs (Defra)
- Department of Trade and Industry (DTI)
- Department for Transport (DfT)
- Home Office

In addition, the Council also consulted the following Government Departments:

- Department of Health (through Regional Public Health Group)

- Ministry of Defence
- Department of Work and Pensions
- Department of Constitutional Affairs
- Office of Government Commerce (Property Advisers to the Civil Estate)

## Appendix 3

### **General and Other Consultees**

The following general consultation bodies were consulted by the Council, in accordance with the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Development) (England) Regulations 2004 and the Council's adopted Statement of Community Involvement:

- Voluntary bodies some or all of whose activities benefit any part of the Borough
- Bodies which represent the interests of different racial, ethnic or national groups in the Borough
- Bodies which represent the interests of different religious groups in the Borough
- Bodies which represent the interests of disabled persons in the Borough
- Bodies which represent the interests of persons carrying out business in the Borough

### **Other Consultees**

The Council also consulted the following agencies and organisations:

- Age Concern
- Airport Operators
- British Chemical Distributors and Traders Association
- British Geological Survey
- British Waterways, canal owners and navigation authorities
- Centre for Ecology and Hydrology
- Chambers of Commerce, local Confederation of British Industry and local branches of Institute of Directors
- Church Commissioners
- Civil Aviation Authority
- Coal Authority
- Commission for Architecture and the Built Environment
- Commission for New Towns and English Partnerships
- Commission for Racial Equality
- Crown Estate Office
- Diocesan Board of Finance
- Disabled Persons Transport Advisory Committee (now part of the Inclusive Environment Group)
- Electricity, Gas and Telecommunications Undertakers, and the National Grid Company
- Environmental groups at national, regional and local level, including:
  - (i) Campaign to Protect Rural England (Lancashire branch only)
  - (ii) Friends of the Earth
  - (iii) Royal Society for the Protection of Birds
  - (iv) Wildlife Trusts
- Equal Opportunities Commission
- Fire and Rescue Services

- Forestry Commission
- Freight Transport Association
- Gypsy Council
- Health and Safety Executive
- Help the Aged
- Housing Corporation
- Learning and Skills Councils
- Local Agenda 21 including:
  - (i) Civic Societies
  - (ii) Community Groups
  - (iii) Local Transport Authorities
  - (iv) Local Transport Operators
  - (v) Local Race Equality Councils and other local equality groups
- National Playing Fields Association
- National Trust
- Network Rail
- Passenger Transport Authorities
- Passenger Transport Executives
- Police Architectural Liaison Officers / Crime Prevention Design Advisors
- Port Operators
- Rail Companies and the Rail Freight Group
- Regional Housing Boards
- Regional Sports Boards
- Road Haulage Association
- Royal Mail Group plc
- Sport England
- The Home Builders Federation
- Traveller Law Reform Coalition
- Water Companies
- Women's National Commission

#### LDF Mailing List

The Council also notified those individuals and organisations on the LDF mailing list that consultation was underway on the draft SPD and accompanying documents.

## Appendix 4 – Responses to Consultation of draft SDP and Supporting Documents

(Comments with reference number ending in SPD relate to the draft SPD, those ending in SA relate to the Sustainability Appraisal, those ending in HRA relate to the Habitat Regulations Assessment.)

| <b>Individual/ Organisation</b> | <b>Reference Number</b> | <b>Summary of Representations</b>  | <b>Council's Response</b>   |
|---------------------------------|-------------------------|--|---|
| GONW                            | 45/AES/001/SPD          | No Comments.   | None required.  |
| Disability Rights Commission    | 111/AES/001/SPD         | No Comments.   | None required.  |
| Redrow Homes                    | 611/AES/001/SPD         | Paragraphs 3.6 and 5.35 seek to create a preference for mixed-use developments, which does not appear in either B2.1 or B2.2. It is inappropriate for an SPD to introduce a new policy test, as this will not be subject to the independent scrutiny of a Planning Inspector. There is no policy basis for favouring mixed use developments. Exclusively residential scheme would still make a contribution to supporting the local economy by helping to retain/attract staff and creating a demand for goods and services. | UDP Policy B2.1 (Para. 5.27) and Policy B2.2 (Para. 5.35) states that the Council will look more favourably on mixed-use developments than residential developments on employment land. The Council is not creating new policy but reflecting the wording within the UDP. |
| Redrow Homes                    | 611/AES/002/SPD         | The lack of clear guidance on the length of the marketing campaign creates uncertainty and is unhelpful. Duration of 6-12 months would be reasonable and this should be included in the text.  | A 12-month marketing limit was considered as part of the UDP review process but was not pursued as the Council found a minimum marketing time period soon became interpreted as a maximum. The  |



| Individual/<br>Organisation | Reference<br>Number | Summary of<br>Representations   | Council's<br>Response  |
|-----------------------------|---------------------|---|--|
|                             |                     |   | length of time a site should be marketed for will always be dependent on a number of factors, including the price, location, size, use, and marketing methods adopted, amongst others. By agreeing a marketing method and time period with Council beforehand, all the above factors can be taken into consideration.  |
| Redrow Homes                | 611/AES/003/SPD     | Paragraph 5.5 iii will not be possible in all circumstances for confidentiality reasons. Confidentiality can be a key issue for some businesses, particularly when they are seeking to relocate, so as not to unsettle existing staff/customers. This must be acknowledged in the text. | The Council agrees that there may be situations where the need for confidentiality is a legitimate business concern. However, the Council has statutory obligations under various enactments to disclose information on request. Any information provided by a developer/applicant will, if requested, be treated as confidential, subject to the disclosure provisions of the Freedom of Information Act, the Environmental Information Regulations or any other statutory provisions concerning disclosure of information. |

| <b>Individual/<br/>Organisation</b> | <b>Reference<br/>Number</b> | <b>Summary of<br/>Representations</b>   | <b>Council's<br/>Response</b>  |
|-------------------------------------|-----------------------------|---|--|
| Redrow Homes                        | 611/AES/004/SPD             | Paragraph 6.4 – It should not be necessary to show that all reasonable redevelopment and refurbishment options would produce a negative value. That would suggest that a land value of just £1 makes a project viable, which is not the case. What is at issue here is whether the resultant land value is so low that it would not create sufficient incentive to a landowner/developer or a lender, acting reasonably, to proceed with the development. | Agree to reword paragraph 6.4 to, 'the applicant will need to provide evidence that they have considered all reasonable redevelopment and refurbishment options, and show that the potential return for employment use is so low that the site is likely to remain sterilised. In the case of PEZs...' |
| Redrow Homes                        | 611/AES/005/SPD             | Paragraph 6.5 – Any comparable evidence used must be a true comparable to be of any worth and reference to such a wide geographical area as the 'Borough' is unlikely to meet that test. Comparable evidence should be obtained from other sites within the locality wherever possible, and if not, from areas with similar characteristics.  | Agree to add, 'and location' after, 'transactions of a comparable nature'.   |
| WM Morrison Supermarkets PLC        | 605/AES/001/SPD             | Supports a flexible approach to the redevelopment of employment sites if it can be demonstrated that there is no demand for the site  | Policy B2.1 Primary Employment Zones allows for small scale retailing, subject to the requirements of Policy S2.3, which does not exceed 300   |

| Individual/<br>Organisation | Reference<br>Number | Summary of<br>Representations   | Council's<br>Response  |
|-----------------------------|---------------------|---|--|
|                             |                     | and that it is unviable to retain it in employment use. Consider that there may be circumstances where retail uses as well as housing and community uses are appropriate on sites, which are designated for employment uses, if a lack of demand for employment uses on these sites, can be proven. This then ensures that land does not remain vacant. | square metres gross. Any larger retail proposals would be classed as a departure from the UDP policy and would need to be assessed according to relevant retail policies in the UDP. Policies B2.1 and B2.2 allow for housing and community uses to be permitted on employment land in circumstances when certain criteria is met. Polices B2.1 and B2.2 do not allow for large-scale retail to be permitted on employment land. |
| British Waterways           | 73/AES/001/SPD      | Support the SPD for raising the importance of the SSSI/SAC Rochdale Canal, if their changes suggested below are incorporated.   | None required.   |
| British Waterways           | 73/AES/002/SPD      | British Waterways manage the Rochdale Canal and should be included as a pre-application consultee within paragraph 4.2 and 4.3 in addition to GMEU. And also British Waterways contact details should be added into appendix 7 of the SPD.  | British Waterways are identified as a consultee in the Council's Statement of Community Involvement and would be consulted on planning applications affecting canals. Agree to add contact details added to appendix 7 of the SPD.   |
| British Waterways           | 73/AES/003/SA       | There is a Rochdale Canal SSSI/SAC  | The document is too specific to be made  |

| Individual/<br>Organisation           | Reference<br>Number | Summary of<br>Representations   | Council's<br>Response   |
|---------------------------------------|---------------------|---|---|
|                                       |                     | <p>'Planners Information Pack' pamphlet which is currently being updated and which provides information for developers proposing developments near the Rochdale Canal. This is being produced by GMEU, British Waterways and Natural England jointly. Reference to this document should be included in the SPD.</p> | <p>reference to in the SPD. Added to list in Sustainability Appraisal appendix 1 (Scoping Report).</p>  |
| British Waterways                     | 73/AES/004/HRA      | Paragraph 7.2 – British Waterways should be included as a consultee in this list.   | British Waterways are identified as a consultee in the Council's Statement of Community Involvement and would be consulted on planning applications affecting canals. |
| Northwest Regional Development Agency | 27/AES/001/SPD      | General support for draft SPD.  | None required.  |
| Housing Market Renewal Core Team      | 194/AES/001/SPD     | Overall the pathfinder offers its support for the document, which now sets a framework within which decisions on the use of employment land for housing can be taken.   | None required.  |
| Housing Market Renewal Core Team      | 194/AES/002/SPD     | Suggest revised wording of paragraph 7.13, third bullet point, in relation to a mix and affordable housing, to, "That new housing developments contain a mix of affordable  | All proposals for housing development will have to comply with UDP Policy H1.5, 'Housing Choice and Diversity'. Agree to alter the wording to "That new               |

| Individual/<br>Organisation        | Reference<br>Number | Summary of<br>Representations   | Council's<br>Response  |
|------------------------------------|---------------------|---|--|
|                                    |                     | and market housing appropriate to the objectives of the HMR Pathfinder. In order to meet HMR objectives affordable housing developed as part of a mixed tenure scheme should be integrated throughout the development.” | housing developments contain a mix of affordable and market housing developed as part of a mixed tenure scheme and should be integrated throughout the development.” |
| Mrs J. Kay                         | 295/AES/001/SPD     | Supports SPD. It appears to be a comprehensive report, which covers all aspects in depth.   | None required.   |
| North West<br>Regional<br>Assembly | 1/AES/001/SPD       | No Comments.  | None Required.   |
| GMPTE                              | 118/AES/001/SPD     | Support the inclusion in paragraph 8.5 that a measure to increase the local employment opportunities could be contributions towards new bus services to support local residents in travelling to employment.            | None required.   |

| <b>Individual/<br/>Organisation</b> | <b>Reference<br/>Number</b> | <b>Summary of<br/>Representations</b>   | <b>Council's<br/>Response</b>   |
|-------------------------------------|-----------------------------|---|---|
| GMPTE                               | 118/AES/002/SPD             | If an employment site was to be released for community facilities an accessibility assessment of the site should be undertaken. If a site has poor public transport accessibility it should not be used for community purposes. | If an employment site were to be released for use as a community facility it would also have to conform with Policy CF1.2 in the UDP 'New and Improved Community and Education Facilities'. This policy states that as a minimum a new community facility should have satisfactory accessibility to public transport. Any new development would also have to comply with Policy T2, 'The Accessibility of New Development' and Policy T2.1, 'Public Transport Accessibility'. |
| National Trust                      | 116/AES/001/SPD             | No comment.   | None Required.  |
| Highways Agency                     | 5/AES/001/SPD               | No comment.   | None Required.  |
| The Theatres Trust                  | 526/AES/001/SPD             | No comment.   | None Required.  |
| Environment Agency                  | 3/AES/001/SPD               | It is important that the issue of flood risk is considered when looking at potential employment sites or existing employment sites for other development.   | Any development within flood risk areas will have to satisfy policy NR2.2 in the UDP, 'flooding and Flood Protection', which is based on PPS25, 'Development and Flood Risk' (December 2006).   |

| <b>Individual/<br/>Organisation</b> | <b>Reference<br/>Number</b> | <b>Summary of<br/>Representations</b>   | <b>Council's<br/>Response</b>  |
|-------------------------------------|-----------------------------|---|--|
| Environment Agency                  | 3/AES/002/SPD               | It is also important that issues such as contaminated land and impacts on other habitats are considered.  | There is a separate Contaminated Land SPD, (adopted June 2007), which deals with issues relating to contaminated land.<br>Policy OE2.3 in the UDP, 'Habitat Protection' is concerned with the protection of various designated sites from any harmful development.   |
| Natural England                     | 2/AES/001/SPD               | Welcomes Section 4 on European sites. Would welcome inclusion of a paragraph to identify the potential for contaminated sites to have biodiversity value, similar to the value of brownfield sites. | There is a separate Contaminated Land SPD, (adopted June 2007), which deals with issues relating to contaminated land.<br>Policy OE2.3 in the UDP, 'Habitat Protection' is concerned with the protection of various designated sites from any harmful development. Policy OE2.4 in the UDP, 'Species Protection', protects species protected by law and species identified in the Oldham Biodiversity Action Plan. |

| <b>Individual/<br/>Organisation</b> | <b>Reference<br/>Number</b> | <b>Summary of<br/>Representations</b>  | <b>Council's<br/>Response</b>  |
|-------------------------------------|-----------------------------|--|--|
| Natural<br>England                  | 2/AES/001/SA                | Strongly consider that a quote should be inserted from Section 40 of the Natural Environment and Rural Communities (NERC) Act to explain the Authority's duties as far as exercising its functions, and having regard to the purpose of conserving biodiversity. | Added to list in Sustainability Appraisal appendix 1 (Scoping Report).   |
| Natural<br>England                  | 2/AES/001/HRA               | Satisfied with the screening report for the HRA. Suggest rewording of paragraph iv of the introduction to better reflect the conclusion of the HRA.  | Agree to reword paragraph iv to 'Task 1, also referred to as 'screening', determines whether the subsequent steps (tasks 2 and 3) of appropriate assessment are required. In this instance the Greater Manchester Ecology Unit has concluded, subject to changes to the draft SPD which have been incorporated, that an Appropriate Assessment will not be required, since there are sufficient safeguards in the document to ensure that there will be no damaging effects caused by the implementation of the SPD on the European designated sites'. |



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| English Heritage                               | 4/AES/001/SA                | It is suggested that the SA refer to the potential for a 'conservation-deficit' relating to a building of historical or architectural interest and that this could factor in assessing alternative uses and additional development. | After clarifying with English Heritage, conservation deficit is defined as cases where a building costs more to repair than it is worth when repaired. The UDP recognises the need for flexibility to secure viable futures for historic buildings in paragraph 5.36, stating that the Council may permit a non-employment use in order to secure the retention and refurbishment of a listed mill or locally important building. |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/001/SPD             | The SPD may be pre-empting work on the Core Strategy and Allocation DPD.  | The SPD relates to adopted UDP Policy and not to the LDF and does not pre-empt the Core Strategy.   |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/002/SPD             | SPD should not start from the view that all land should be protected.   | The SPD relates to UDP Policy and paragraph 5.26 of the UDP states, 'the primary purpose of the PEZ policy is to protect existing employment areas'.  |

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| Paul Martin on behalf of P & D Northern Steels | 218/AES/003/SPD             | Paragraph 2.1 - Comments that PEZs offer "continuing opportunities for existing firms to expand". The paragraph should be expanded to recognise that in some circumstances the expansion can only be achieved through relocation to new premises, funded by a capital receipt, as a result of change of use and redevelopment of a former employment premises.  | The SPD is expanding on UDP Policy and paragraph 5.23 of the UDP, which states that, 'By allocating PEZ's the Council aims to provide continuing opportunities for existing firms to expand...'   |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/004/SPD             | Paragraph 2.1 - also comments on "demand in Oldham for land for the relocation of existing businesses". The paragraph should recognise that there is a very significant, regional and strategic Business Park development in an adjacent Borough, providing a supply of land. This wider area should be considered and the quality and location of this employment land needs to be considered and the land be fit for purpose. | It is not considered appropriate for regional and strategic Business Parks to be mentioned in the introduction, however it is accepted that the marketing exercise can take account of available space outside of the Borough, although it is clear that this must be directly relevant to the specific case in question. |

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| Paul Martin on behalf of P & D Northern Steels | 218/AES/005/SPD             | Paragraph 4.3 is too vague/is not clear. More guidance should be provided for businesses and GMEU. The 100m and 500m thresholds do not seem to be based on anything. | <p>The distance thresholds quoted in the SPD screening opinion are based on GMEU advice. GMEU provided us with this paragraph, which has been inserted into paragraphs 4.4 and 4.5 of the SPD, "Buffer Zones' for consideration of applications for development that may affect the special interest of Special Areas of Conservation (SAC) have been set, such that all developments within the stated buffer zones will be assessed for their possible impacts on the SAC. The recommended buffer zones are based on an analysis of the operations considered likely to detrimentally affect the special interest of the SAC's concerned, such that the vast majority of developments outside of the buffer zones are considered very unlikely to affect the special interest of the SAC.</p> <p>It remains the case that, for a small number of very large developments or operations</p> |

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|  |                     |  | <p>considered to be especially environmentally damaging that come forward outside of the buffer zones</p> <p>Appropriate Assessment may be required.</p> <p>Some developments that may be assessed in isolation as having no significant effect on the special interest of an SAC may when considered <i>in combination</i> with other development plans be assessed as possibly having an effect. For these developments Appropriate Assessment may be required.”</p> |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/006/SPD     | Paragraph 5.2 is too vague, more guidance should be provided. The SPD should be more specific on 'reasonable timescales', is this 1/6/12 months? Also the SPD should refer to where and from whom the Council obtains its view on market conditions. | A 12-month marketing limit was considered as part of the UDP review process but was not pursued as the Council found a minimum marketing time period soon became interpreted as a maximum. The length of time a site should be marketed for will always be dependent on a number of factors, including the price, location, size, use, and marketing methods adopted, amongst others.  |

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|  |                     |  | By agreeing a marketing method and time period up front with Council, all the above factors can be taken into consideration.   |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/007/SPD     | Paragraph 5.3, when considering appraisals, the costs associated with amalgamation and demolition, assessment of the cost of remediation, the cost implications of ground conditions and an assessment of whether there is suitable access provisions, should be taken into account. | Most costs referred to when assessing an appraisal would be accepted as valid development costs, however the cost of providing a revised access would only be applicable when considering a redevelopment of the site.                             |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/008/SPD     | Paragraph 5.4, point a – 'prevailing market rate' and 'reasonable offer', are vague and should be defined in the SPD. Also the SPD should refer to where and from whom the Council obtains its view on what 'accords with other commercial property of a similar type'.              | The Council does not accept that these terms are vague; they are standard surveying terms, which have recognised meanings. This information would be in compliance with current guidance from the RICS (Royal Institution of Chartered Surveyors). |

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| Paul Martin on behalf of P & D Northern Steels | 218/AES/009/SPD             | Paragraph 5.4, point g – too vague/not clear. More guidance should be provided. It should be more specific on 'on-going reviews' so the marketing exercise cannot be continuously extended without a fair end date to the exercise. | The Council will be willing to provide further guidance in each specific case, depending upon the particular circumstances of that individual case.   |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/010/SPD             | Paragraph 5.6, reference should be added at the end after 'a lesser financial return on investment' to include and provide for a profit and return.   | The paragraph is intended to clarify that a higher return for an alternative non-employment use will not be a sufficient reason to justify a change of use. An appropriate allowance for a fair and reasonable profit/return is an acceptable cost in assessing the redevelopment of the site/property for employment purposes. |

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| Paul Martin on behalf of P & D Northern Steels | 218/AES/011/SPD             | A general comment is that the marketing exercise and results should not be the only factor when considering applications for a change of use. Factors including the needs of companies to release the funds to facilitate expansion should be recognised. The marketing exercise should not be too onerous on small local businesses so that their ability to compete in the global economy is hampered. It should not ignore land in the adjoining Boroughs e.g. Kingsway, Business Park, Rochdale. | The needs of companies to release funds to facilitate expansion is not a valid factor that will be taken into account in assessing a change of use. It is accepted that the marketing exercise should not be too onerous on small local businesses; however there are minimum requirements that must be met and these will be judged on their own merits, taking into account the particular circumstances of the individual case. It is accepted that the marketing exercise can take account of available space outside of the Borough, however it is clear that this must be directly relevant to the specific case in question. |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/012/SPD             | Paragraph 6.1 point a – suggest change of wording to read 'Assessing the cost of works needed to bring the site back into use for modern business use for employment/business purposes'  | It is too restrictive to insert 'modern' into paragraph 6.1.  |

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| Paul Martin on behalf of P & D Northern Steels | 218/AES/013/SPD             | Paragraph 6.1, suggest adding a third paragraph c) referring to the need to allow for 'fair profit' and who decides what is fair and what isn't.   | The costs referred to in paragraph a, would already allow for the inclusion of an appropriate allowance for a fair and reasonable profit/return for redevelopment purposes, as part of the overall viability assessment.  |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/014/SPD             | Paragraph 6.3 – too vague/not clear. More guidance should be provided on who determines "currently known and potential known patterns of demand". What is a 'potential known'?   | As stated in paragraph 6.3 the development appraisals will be undertaken by a suitably qualified surveyor, who will understand the requirements in relation to current and future demand.   |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/015/SPD             | Paragraph 6.4 – replace 'negative' with low. In order to rule out commercial re-use options it should be considered sufficient by the Council for businesses to work through a viability exercise and prove that the commercial land value is 'low'. | Comment noted. Agree to reword paragraph 6.4 to, 'the applicant will need to provide evidence that they have considered all reasonable redevelopment and refurbishment options, and show that the potential return for employment use is so low that the site is likely to remain sterilised. In the case of PEZs...' |



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| Paul Martin on behalf of P & D Northern Steels | 218/AES/016/SPD             | Paragraph 6.4 – a costed site investigation could cost circa £20,000 - £50,000 – this is an onerous condition, which is not proportionate with the exercise of demonstrating the viability of employment land and premises. It is overly restrictive on small businesses.  | If a submitted appraisal includes for abnormal ground conditions, then this will need to be evidenced with the appropriate supporting information in each individual case.  |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/017/SPD             | Paragraph 6.5 – too vague/not clear. More guidance should be provided on who determines 'prevailing freehold and leasehold market rates'. Also suggest adding, 'also taking into account site specifics' to the end of the paragraph. The viability assessment should be able to draw comparisons with commercial space and land availability in adjoining Boroughs e.g. Kingsway Business Park, Rochdale. | The marketing report will normally be undertaken by a suitably qualified surveyor, who will be well aware of the requirements in assessing market rates and in the relevance/adjustment of available comparable evidence, which may well include sites from outside of the Borough, dependent upon the circumstances of each individual case. |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/018/SPD             | Emphasis is on HMR areas, this ignores the needs of housing areas outside of HMR areas, which should not be ignored.   | The Policy is a Boroughwide policy and the purpose of the SPD is to expand upon that policy. A key aspect on the policy does relate to HMR areas but the SPD also deals with areas outside of HMR.  |

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| Paul Martin on behalf of P & D Northern Steels | 218/AES/019/SPD             | Paragraph 7.7 is too vague; the arbitrary 500m boundaries do not seem to be based on anything.   | The Council's view is that it is both appropriate and necessary to include a distance threshold in order to ensure effective implementation of the Policy. The figure selected is considered appropriate within the context of the HMR Pathfinder Initiative, and it is made clear in the SPD that the threshold is only to be used as a 'general presumption' and each development proposal would be considered on its individual merits. |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/020/SPD             | Employment sites being brought forward as residential sites should not be seen as opportunities for meeting funding gaps for HMR.  | There is no suggestion, either in the Policy or the SPD, that this is the case.  |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/021/SPD             | Paragraph 8.6 suggest rewording to, 'It should be noted that this list is not exhaustive and developers will only be required to deliver specific and individual items from the list above...' | Paragraph 8.6 comprises of a number of suggested measures, which may be sought individually, in combination, or in combination with other measures not listed, it will be dependent on the case.   |

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| Paul Martin on behalf of P & D Northern Steels | 218/AES/022/SPD             | Paragraph 8.8 is too vague – more clarity is needed.  | Every proposal and site will be different; no more clarity can be given, as they will be judged on a case-by case basis.   |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/023/SPD             | Paragraph 8.9 is too vague. If the planning case officer is able to outline approximate levels of requirement during negotiations it should be possible to provide more detailed guidance in the SPD.   | It is not possible to give more detailed guidance within the SPD as the level of requirement will be judged on a case-by-case basis and will depend on the scale and type of development proposed.                           |
| Paul Martin on behalf of P & D Northern Steels | 218/AES/024/SPD             | Paragraph 8.10 refers to the Council not imposing time limits for spending s106 money 'because of changing market conditions, training and economic prosperity evolving over time'. This is the very reason why the SPD should provide as much flexibility as possible for local business, with the focus and principle of the SPD to avoid excessive restrictions. | Noted. The SPD does not intend to be onerous; however there are minimum requirements that must be met and these will be judged on their own merits, taking into account the particular circumstances of the individual case. |
| Peter Platt, P & S Commercials                 | 694/AES/001/SPD             | The SPD may be pre-empting work on the Core Strategy and Allocation DPD.  | The SPD relates to adopted UDP Policy and not to the LDF and does not pre-empt the Core Strategy.  |

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| Peter Platt, P & S Commercials      | 694/AES/002/SPD             | SPD should not start from the view that all land should be protected.  | The SPD relates to UDP Policy and paragraph 5.26 of the UDP states, 'the primary purpose of the PEZ policy is to protect existing employment areas'.  |
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|                                |                     |   | <p>considered to be especially environmentally damaging that come forward outside of the buffer zones<br/>Appropriate Assessment may be required.<br/>Some developments that may be assessed in isolation as having no significant effect on the special interest of an SAC may when considered <i>in combination</i> with other development plans be assessed as possibly having an effect. For these developments Appropriate Assessment may be required.”</p> |
| Peter Platt, P & S Commercials | 694/AES/006/SPD     | <p>Paragraph 5.2 is too vague, more guidance should be provided. The SPD should be more specific on 'reasonable timescales', is this 1/6/12 months? Also the SPD should refer to where and from whom the Council obtains its view on market conditions.</p> | <p>A 12-month marketing limit was considered as part of the UDP review process but was not pursued as the Council found a minimum marketing time period soon became interpreted as a maximum. The length of time a site should be marketed for will always be dependent on a number of factors, methods adopted, amongst others.</p>   |

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| Peter Platt, P & S Commercials | 694/AES/008/SPD     | Paragraph 5.4, point a – 'prevailing market rate' and 'reasonable offer', are vague and should be defined in the SPD.<br>Also the SPD should refer to where and from whom the Council obtains its view on what 'accords with other commercial property of a similar type'.           | The Council does not accept that these terms are vague; they are standard surveying terms, which have recognised meanings. This information would be in compliance with current guidance from the RICS (Royal Institution of Chartered Surveyors). |



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| Peter Platt, P & S Commercials      | 694/AES/011/SPD             | <p>A general comment is that the marketing exercise and results should not be the only factor when considering applications for a change of use. Factors including the needs of companies to release the funds to facilitate expansion should be recognised. The marketing exercise should not be too onerous on small local businesses so that their ability to compete in the global economy is hampered. It should not ignore land in the adjoining Boroughs e.g. Kingsway, Business Park, Rochdale.</p> | <p>The needs of companies to release funds to facilitate expansion is not a valid factor that will be taken into account in assessing a change of use. It is accepted that the marketing exercise should not be too onerous on small local businesses; however there are minimum requirements that must be met and these will be judged on their own merits, taking into account the particular circumstances of the individual case. It is accepted that the marketing exercise can take account of available space outside of the Borough, however it is clear that this must be directly relevant to the specific case in question.</p> |
| Peter Platt, P & S Commercials      | 694/AES/012/SPD             | <p>Paragraph 6.1 point a – suggest change of wording to read 'Assessing the cost of works needed to bring the site back into use for modern business use for employment/business purposes'</p>  | <p>It is too restrictive to insert 'modern' into paragraph 6.1.</p>  |

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| Peter Platt, P & S Commercials      | 694/AES/013/SPD             | Paragraph 6.1, suggest adding a third paragraph c) referring to the need to allow for 'fair profit' and who decides what is fair and what isn't.   | The costs referred to in paragraph a, would already allow for the inclusion of an appropriate allowance for a fair and reasonable profit/return for redevelopment purposes, as part of the overall viability assessment.  |
| Peter Platt, P & S Commercials      | 694/AES/014/SPD             | Paragraph 6.3 – too vague/not clear. More guidance should be provided on who determines "currently known and potential known patterns of demand". What is a 'potential known'?   | As stated in paragraph 6.3 the development appraisals will be undertaken by a suitably qualified surveyor, who will understand the requirements in relation to current and future demand.   |
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| Peter Platt, P & S Commercials      | 694/AES/017/SPD             | Paragraph 6.5 – too vague/not clear. More guidance should be provided on who determines 'prevailing freehold and leasehold market rates'. Also suggest adding, 'also taking into account site specifics' to the end of the paragraph. The viability assessment should be able to draw comparisons with commercial space and land availability in adjoining Boroughs e.g. Kingsway Business Park, Rochdale. | The marketing report will normally be undertaken by a suitably qualified surveyor, who will be well aware of the requirements in assessing market rates and in the relevance/adjustment of available comparable evidence, which may well include sites from outside of the Borough, dependent upon the circumstances of each individual case. |
| Peter Platt, P & S Commercials      | 694/AES/018/SPD             | Emphasis is on HMR areas, this ignores the needs of housing areas outside of HMR areas, which should not be ignored.   | The Policy is a Boroughwide policy and the purpose of the SPD is to expand upon that policy. A key aspect on the policy does relate to HMR areas but the SPD also deals with areas outside of HMR.  |

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| Peter Platt, P & S Commercials      | 694/AES/019/SPD             | Paragraph 7.7 is too vague; the arbitrary 500m boundaries do not seem to be based on anything.   | The Council's view is that it is both appropriate and necessary to include a distance threshold in order to ensure effective implementation of the Policy. The figure selected is considered appropriate within the context of the HMR Pathfinder Initiative, and it is made clear in the SPD that the threshold is only to be used as a 'general presumption' and each development proposal would be considered on its individual merits. |
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| Peter Platt, P & S Commercials      | 694/AES/024/SPD             | Paragraph 8.10 refers to the Council not imposing time limits for spending s106 money 'because of changing market conditions, training and economic prosperity evolving over time'. This is the very reason why the SPD should provide as much flexibility as possible for local business, with the focus and principle of the SPD to avoid excessive restrictions. | Noted. The SPD does not intend to be onerous; however there are minimum requirements that must be met and these will be judged on their own merits, taking into account the particular circumstances of the individual case. |
| Mr Ivon Kershaw                     | 693/AES/001/SPD             | The SPD may be pre-empting work on the Core Strategy and Allocation DPD.  | The SPD relates to adopted UDP Policy and not to the LDF and does not pre-empt the Core Strategy.  |

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|                             |                     |                               | <p>considered to be especially environmentally damaging that come forward outside of the buffer zones</p> <p>Appropriate Assessment may be required.</p> <p>Some developments that may be assessed in isolation as having no significant effect on the special interest of an SAC may when considered <i>in combination</i> with other development plans be assessed as possibly having an effect. For these developments</p> <p>Appropriate Assessment may be required.”</p> |

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| Mr Ivon<br>Kershaw                  | 693/AES/009/SPD             | Paragraph 5.4, point g – too vague/not clear. More guidance should be provided. It should be more specific on 'on-going reviews' so the marketing exercise cannot be continuously extended without a fair end date to the exercise.  | The Council will be willing to provide further guidance in each specific case, depending upon the particular circumstances of that individual case.   |
| Mr Ivon<br>Kershaw                  | 693/AES/010/SPD             | Paragraph 5.6, reference should be added at the end after 'a lesser financial return on investment' to include and provide for a profit and return.  | The paragraph is intended to clarify that a higher return for an alternative non-employment use will not be a sufficient reason to justify a change of use. An appropriate allowance for a fair and reasonable profit/return is an acceptable cost in assessing the redevelopment of the site/property for employment purposes. |

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| Mr Ivon<br>Kershaw                  | 693/AES/012/SPD             | Paragraph 6.1 point a – suggest change of wording to read 'Assessing the cost of works needed to bring the site back into use for modern business use for employment/business purposes'  | It is too restrictive to insert 'modern' into paragraph 6.1.  |

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| Mr Ivon<br>Kershaw                  | 693/AES/014/SPD             | Paragraph 6.3 – too<br>vague/not clear. More<br>guidance should be<br>provided on who<br>determines "currently<br>known and potential<br>known patterns of<br>demand". What is a<br>'potential known'?  | As stated in<br>paragraph 6.3 the<br>development<br>appraisals will be<br>undertaken by a<br>suitably qualified<br>surveyor, who will<br>understand the<br>requirements in<br>relation to current<br>and future demand.   |
| Mr Ivon<br>Kershaw                  | 693/AES/015/SPD             | Paragraph 6.4 –<br>replace 'negative' with<br>low. In order to rule<br>out commercial re-<br>use options it should<br>be considered<br>sufficient by the<br>Council for<br>businesses to work<br>through a viability<br>exercise and prove<br>that the commercial<br>land value is 'low'. | Comment noted.<br>Agree to reword<br>paragraph 6.4 to, 'the<br>applicant will need to<br>provide evidence that<br>they have considered<br>all reasonable<br>redevelopment and<br>refurbishment<br>options, and show<br>that the potential<br>return for<br>employment use is<br>so low that the site is<br>likely to remain<br>sterilised. In the case<br>of PEZs...' |

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| Mr Ivon<br>Kershaw                  | 693/AES/017/SPD             | Paragraph 6.5 – too vague/not clear. More guidance should be provided on who determines 'prevailing freehold and leasehold market rates'. Also suggest adding, 'also taking into account site specifics' to the end of the paragraph. The viability assessment should be able to draw comparisons with commercial space and land availability in adjoining Boroughs e.g. Kingsway Business Park, Rochdale. | The marketing report will normally be undertaken by a suitably qualified surveyor, who will be well aware of the requirements in assessing market rates and in the relevance/adjustment of available comparable evidence, which may well include sites from outside of the Borough, dependent upon the circumstances of each individual case. |
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| Samuel Brian Sanderson.<br>Sanderson Bros<br>Commercials | 693/AES/023/SPD             | Paragraph 8.9 is too vague. If the planning case officer is able to outline approximate levels of requirement during negotiations it should be possible to provide more detailed guidance in the SPD.   | It is not possible to give more detailed guidance within the SPD as the level of requirement will be judged on a case-by-case basis and will depend on the scale and type of development proposed.                           |
| Samuel Brian Sanderson.<br>Sanderson Bros<br>Commercials | 695/AES/024/SPD             | Paragraph 8.10 refers to the Council not imposing time limits for spending s106 money 'because of changing market conditions, training and economic prosperity evolving over time'. This is the very reason why the SPD should provide as much flexibility as possible for local business, with the focus and principle of the SPD to avoid excessive restrictions. | Noted. The SPD does not intend to be onerous; however there are minimum requirements that must be met and these will be judged on their own merits, taking into account the particular circumstances of the individual case. |

| <b>Individual/<br/>Organisation</b> | <b>Reference<br/>Number</b> | <b>Summary of<br/>Representations</b>  | <b>Council's<br/>Response</b>  |
|-------------------------------------|-----------------------------|--|--|
| Roy Bardsley                        | 356/AES/001/SPD             | There are many references to 'Oldham' throughout the document, which makes it unclear as to whether the SPD is referring to the town of that name or to the Borough. If abbreviations have to be made it would be clearer to refer to the administrative area as the Borough or OMB, to avoid confusion with the town. | Comment Noted. Agree to make it clear when referring to the town of Oldham or Oldham Metropolitan Borough.   |
| Roy Bardsley                        | 356/AES/002/SPD             | The guidelines in this SPD are too flexible and can be interpreted in many different ways. 53% of the Borough is rural or semi rural and the different needs of this area has not received sufficient, sympathetic consideration.  | The UDP applies to the Borough document except that part, which is the responsibility of the Peak Park. The SPD seeks to expand upon UDP Policies B2.1 and B2.2, which are Boroughwide policies. |
| CABE                                | 80/AES/001/SPD              | LDF's offer an opportunity to secure high-quality development.   | The SPD relates to adopted UDP Policy and not to the LDF. The Council has produced an Urban Design Guide SPD, which is due to be adopted September 2007. CABE have been advisors on that SPD.    |

| <b>Individual/<br/>Organisation</b>   | <b>Reference<br/>Number</b> | <b>Summary of<br/>Representations</b>   | <b>Council's<br/>Response</b>   |
|---|-----------------------------|---|---|
| CABE  | 80/AES/002/SPD              | Robust design policies should be included within all LDF documents.   | The SPD relates to adopted UDP Policy and not to the LDF. The Council has produced an Urban Design Guide SPD, which is due to be adopted September 2007. CABE have been advisors on that SPD. |
| CABE  | 80/AES/003/SPD              | Local Planning Authorities and members should champion good design.   | The Council has produced an Urban Design Guide SPD, which is due to be adopted September 2007. CABE have been advisors on that SPD.   |
| CABE  | 80/AES/004/SPD              | Design should be treated as a cross cutting issue relating to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm. | The Council has produced an Urban Design Guide SPD, which is due to be adopted September 2007. CABE have been advisors on that SPD.   |
| CABE  | 80/AES/005/SPD              | Design should reflect understanding of local context character and aspirations.   | The Council has produced an Urban Design Guide SPD, which is due to be adopted September 2007. CABE have been advisors on that SPD.   |
| CABE  | 80/AES/006/SPD              | Adequate wording or 'hooks' should be included within policies to enable the development and use of other design tools and mechanisms.  | The Council has produced an Urban Design Guide SPD, which is due to be adopted September 2007. CABE have been advisors on that SPD.   |
| Other amendments have been made including spelling, grammatical and factual matters which do not affect the substance of the SPD or its supporting documents. |                             |   |   |