

OLDHAM'S REPLACEMENT UNITARY  
DEVELOPMENT PLAN

TOPIC PAPER

**BUSINESS, INDUSTRY AND THE LOCAL ECONOMY**

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## **1.0 INTRODUCTION**

- 1.1 This core proof deals with issues relating to business, industry and the local economy.
- 1.2 It starts by providing a brief description of the local economy before going on to look at the wider policy context within which policies and proposals have been developed through the First Deposit and Revised Deposit Stages.
- 1.3 The final sections deal with the main issues raised by objectors and conclude by proposing some Pre Inquiry changes.

## **2.0 BACKGROUND - THE LOCAL ECONOMY**

- 2.1 Oldham has traditionally been a low wage, low skill economy. Its foundation was textile spinning and textile machinery, but this industry had all but disappeared by the early 1980s. Many of the former cotton mills are now used for storage and distribution.
- 2.2 Although the Borough's economic base has changed dramatically in recent years, manufacturing still dominates, accounting for 23% of employment compared with 15% nationally. However, manufacturing continues to decline and local employment in the sector fell by 15% between 1995 and 2000.
- 2.3 Despite this, overall employment in the Borough increased by 3% over this period as a result of a 23% growth in construction and a 10% increase in services. Tourism activity is also growing in importance, creating jobs and providing facilities for visitors and residents alike.
- 2.4 Helped by Government and European funding programmes, Oldham has been successful in restructuring its economy and maintaining employment levels. There are currently around 90,000 people working

in the Borough, of which a large proportion live in Oldham and 20,000 commute from outside.

- 2.5 However, the local economy remains vulnerable. Oldham still has a concentration of employment in those business sectors forecast to decline. Wages and skill levels are low and there are sharp contrasts in the rate of unemployment across the Borough.
- 2.6 New regeneration programmes funded by Central Government and the European Union will help the Borough diversify its economy to consolidate the achievements of the past. The new programmes are expected to unlock over £200 million of public and private investment over a 10-year period.
- 2.7 The main aims will be to create new jobs, improve skill levels, provide more development sites and improve security so that business can prosper. Funding will also be used to exploit the inward investment potential around the Hollinwood Junction of the M60 and further enhance the business and commercial profile of the Town Centre. Local communities will also benefit from a range of education, housing, health and youth focused initiatives.
- 2.8 Over the past 20 years, the trend in employment land take up in the Borough has been on average 8 hectares per year. Monitoring figures for the period since adoption of the Adopted UDP in 1996 show that a significant majority of this business and industrial development (over 75%) have been within the designated Primary Employment Zones (PEZs). A lesser proportion (40%) have been on allocated sites according to monitoring since 1999. Existing employment land and buildings are evenly distributed across the various communities making up the Borough, which to a great extent reflects its industrial past. However, the larger PEZs are located in Oldham, Chadderton and Royton. Although there is a shortage of large strategic sites in the Borough, Oldham is within easy reach of three of the region's major

new employment sites at Kingsway in Rochdale, Ashton Moss in Tameside and Central Business Park in Manchester. It will be important that Oldham residents can access jobs at these locations.

### **3.0 NATIONAL POLICY CONTEXT**

3.1 The policies have been developed within the National Planning Framework provided by Planning Policy Guidance Notes (PPGs). Key PPGs are outlined below.

#### **Planning Policy Guidance Note 1 (PPG1): General Policies and Principles (February 1997)**

3.2 Paragraph 21 states that one of the Government's key aims is to encourage continued economic development in a way that is compatible with its stated environmental objectives. It is important that the locational needs of businesses are taken into account when preparing development plans. In defining suitable locations for development, plan policies should take into account:

- The contribution to regenerating existing urban areas;
- Access to customers;
- Access to raw materials and suppliers;
- Links with other businesses and the special needs of small businesses;
- The workforce catchment area;
- The availability of adequate infrastructure and
- Various transport considerations including the particular needs of the freight industry.

3.3 Paragraph 22 goes on to say that development plans should also:

- Encourage new enterprise and investment by setting out clear land-use policies for industrial and commercial development;
- Provide for new development which will be consistent with transport policy, and
- Ensure that new development is compatible with the objectives of sustainable development including the re-use of previously developed land.

### **Planning Policy Guidance Note 3 (PPG3) – Housing (March 2000)**

- 3.4 Paragraph 42 deals with the issues of reallocating employment and other land to housing and suggests that some local planning authorities may have an over supply of employment land. It urges all local planning authorities to review their non-housing allocations and consider whether some of this land might be better used for housing or mixed-use developments.

### **Planning Policy Guidance Note 4 (PPG4) - Industrial and Commercial Development and Small Firms (November 1992)**

- 3.5 PPG4 emphasises the important role of the planning system in integrating environmental and economic objectives and promoting sustainable development.
- 3.6 Paragraph 5 requires local planning authorities (LPAs) to ‘ensure that development plans contain clear land use policies for different types of industrial and commercial development and positive policies to provide for the needs of small businesses.’
- 3.7 Paragraph 6 recommends that policies should provide for choice, flexibility and competition. ‘LPAs should aim to ensure that there is sufficient land which is readily capable of development and well served by infrastructure. They should also ensure that there is a variety of

sites available to meet the differing needs. A choice of suitable sites will facilitate competition between developers; this will benefit end users and stimulate economic activity.'

3.8 Paragraph 10 acknowledges that whilst locational demands of businesses are a key input, LPAs should seek to achieve wider objectives in the public interest. 'Development Plans offer the opportunity to encourage new development in locations which:

- minimise the length and number of trips, especially by motor vehicles; and
- are served by more energy efficient modes of transport.'

3.9 Paragraph 21 promotes the re-use of land previously used for industrial purposes to assist with urban regeneration. It also advises LPAs that 'optimum use should be made of potential sites and existing premises, taking into account factors such as accessibility by public transport, particularly in the case of labour intensive uses.'

**Planning Policy Guidance Note 12 (PPG 12): Development Plans (December 1999)**

3.10 PPG 12 (paragraph 4.9) urges LPAs to take account of the need to revitalise and broaden the local economy, the need to stimulate employment opportunities and the importance of encouraging industrial and commercial development. They should also provide a range of suitable sites for industrial and commercial development that take account of the needs of existing and future businesses. Although recently superseded by Planning Policy Statement 12, PPG12 remains in operation for development plans still being prepared under the 1999 Development Plan Regulations.

## **Planning Policy Guidance Note 13 (PPG13) – Transport (March 2001)**

- 3.11 PPG 13 seeks to integrate planning and transport at the national, regional and local level to:
- Promote more sustainable transport choices for both people and moving freight;
  - Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling and
  - Reduce the need to travel, especially by car.
- 3.12 Paragraph 6 goes on to advise LPAs to ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking and cycling, whilst recognising that this may be less achievable in some rural areas.
- 3.13 Paragraph 45 advises that LPAs should locate development generating substantial freight movements, such as distribution and warehousing, away from congested central areas and residential areas, and ensure adequate access to trunk roads.

### **Key Policy Issues**

- 3.14 Key policy requirements emerging from the above include:
- The need to provide a range and choice of sites to meet different needs (PPG4, PPG12);
  - The need for economy in the use of land (PPG1, PPG4);
  - The need to regenerate the Borough and revitalise the local economy (PPG1, PPG4, PPG12);
  - The need to review existing employment allocations (PPG3, PPG4); and



- The need to ensure that sites are accessible for businesses and workers (PPG1, PPG4, PPG13).

#### **4.0 REGIONAL POLICY CONTEXT**

4.1 The regional policy framework is provided by the Regional Spatial Strategy (RSS) for the North West, prepared by the North West Regional Assembly, and the Regional Economic Strategy (RES), produced by the North West Development Agency. Both contribute to the sustainable development targets set out in Action for Sustainability (AfS), the Regional Sustainable Development Framework.

4.2 The Government has also published proposals for promoting sustainable growth in the North of England as part of its Sustainable Communities Plan. 'Making it Happen: the Northern Way' sets out a long-term vision for economic growth in the strategic corridor linking Liverpool, Manchester, Leeds, Hull and Newcastle. Oldham is centrally located within the growth corridor.

4.3 RSS and RES for the North West will have a crucial role to play in delivering this vision.

#### **Regional Spatial Strategy (RSS) for the North West – 2003**

4.4 The overriding aim of RSS for the North West is to promote sustainable patterns of spatial development and physical change by ensuring that the Region's economic, social and environmental interests are considered together.

4.5 Economically, the emphasis is on making the Region more competitive and encouraging the sectors with most potential for growth (as identified by the North West Development Agency in the Regional Economic Strategy). However, RSS for the North West also stresses

the need to support urban renaissance and greater levels of social inclusion.

4.6 Seven key objectives are defined and a new Spatial Development Framework establishes guidelines for the distribution of development and for resources to achieve urban renaissance. Oldham is included within one of the priority areas for development and complementary regeneration.

4.7 Four core development principles are also set out to guide spatial and development planning across the region:

**Policy DP1 - Economy in the Use of Land and Buildings** – by ensuring that Development Plans adopt the following sequential approach to meeting development needs:

- Effective use of existing buildings and infrastructure within urban areas;
- Use of previously developed land; and then
- Use of previously undeveloped land (excluding areas of important open space) that is well located in relation to housing, jobs, other services and infrastructure.

All areas should be accessible by public transport, walking or cycling.

**Policy DP2 – Enhancing the Quality of Life** – by promoting sustainable development and ensuring that economic, social and environmental factors are taken into account. Local authorities are advised to use the NWRA's Regional Sustainability Framework 'Action for Sustainability' to inform the sustainability appraisal of development plans.

**Policy DP3 – Quality in New Development** – by ensuring that new development demonstrates good design and respect for its setting.

**Policy DP4 – Promoting Sustainable Economic Growth and Competitiveness and Social Inclusion** – by encouraging the reuse of disused land and buildings, restructuring land uses, creating mixed use and mixed tenure neighbourhoods and improving access to jobs and facilities.

4.7 Relevant economic policies include:

**Policy EC1 – Strengthening the Regional Economy** – emphasises the need for Development Plans to identify a range of suitable sites and premises for employment purposes which:

- complement the Region’s sectoral priorities as set out in the North West Development Agency’s Regional Economic Strategy and
- take account of the needs of local businesses and communities and the need to ensure the modernisation and diversification of older manufacturing industries and their premises.

**Policy EC2 – Manufacturing Industry** – stresses the need to ensure a supply of sites, which meet the changing needs of traditional manufacturing industry as well as emerging activities. Sites should also cater for expansions and relocations as well as the needs of inward investors.

**Policy EC4 - Business Clusters** – advises that Development Plans should consider the potential to promote the clustering of existing and new economic activities with the potential for economic growth, including business and science parks.

**Policy EC6 - Bringing the benefits of economic growth to areas of acute need** – advises local authorities and other agencies to work together to rectify regional imbalances.

**Policy EC7 – Warehousing and Distribution** – stresses the need to ensure that new warehousing and distribution development be located to avoid the unnecessary movement of goods by road and to make best use of the region’s rail network.

**Policy EC8 – Town Centres, Retail, Leisure and Office Developments** – stresses the need to protect, sustain, and improve town centres by:

- encouraging new retail, leisure and mixed use developments within existing town centres and
- directing office developments that generate significant numbers of trips to suitable locations within or adjacent to town and district centres and near to major public transport interchanges within urban areas.

**Policy EC9 – Tourism and Recreation** – acknowledges that tourism has the potential to be a major economic driver in supporting regeneration. Local Partnerships are encouraged to develop tourism strategies that manage existing and new opportunities and promote investment around appropriate attractions and activities. Development Plans should support this by facilitating the provision of employment opportunities and by identifying provision for new facilities in appropriate locations.

### **Regional Economic Strategy (RES)**

- 4.8 The Regional Economic Strategy (RES) 2003 has been prepared by the North West Development Agency (NWDA). It provides the

economic development framework for the region under 5 priority themes:

1. Business Development –

- Exploiting the growth potential of business sectors;
- Improving the competitiveness and productivity of businesses;
- Developing and exploiting the region's knowledge base.

2. Regeneration –

- Delivering an urban renaissance;
- Delivering a rural renaissance;
- Securing social inclusion.

3. Skills and Employment –

- Developing and maintaining a healthy labour market.

4. Infrastructure –

- Developing the strategic transport, communications and economic infrastructure;
- Ensuring a balanced portfolio of employment sites.

5. Image –

- Developing and marketing the region's image.

4.9 To help deliver the RES, the NWDA is committed to assisting the region's regeneration priority areas including Oldham by 'concentrating on schemes that develop the economic infrastructure, remove the barriers to growth (including dereliction) and link areas of opportunity and need.'

4.10 The NWDA also encourages local authorities to improve the physical accessibility of job opportunities through transport initiatives and the choice of employment sites brought forward for development.

4.11 The NWDA has also identified 25 strategic regional sites that are crucial to the effective implementation of the RES. Although none of these sites are within Oldham, 3 in particular will have an impact on the borough:

- North Manchester Business Park, Manchester;
- Kingsway, Rochdale and
- Ashton Moss, Tameside.

4.12 At a sub regional level, the RES encourages Local Authorities 'to secure a complementary portfolio of local employment sites.'

#### **A Strategy for Greater Manchester 2003 (GMS)**

4.13 The Greater Manchester Strategy, produced by the Association of Greater Manchester Authorities (AGMA) in 2003, provides a ten to fifteen year vision for the future of the sub region.

4.14 The document is structured around 8 themes and each chapter sets out key issues, actions and outcome measures. The strategy is guided and informed by the Regional Economic Strategy.

4.15 The first chapter – Promoting a Dynamic Economy – sets out a number of key actions to tackle issues in the area, including:

- Nurturing growth sector industries by investing in high quality sites and premises;
- Delivering strategic sites for investment through a coordinated programme of site assembly and remediation measures;
- Ensuring that the benefits and opportunities of new development and economic growth are available to all communities through

complementary improvements in accessibility, public transport, training and measures to combat social exclusion.

### **Greater Manchester Economic Development Plan 2004/5 – 2006/7 (GMEDP) - 2004**

- 4.16 Set within the context of the RES and the Greater Manchester Strategy, the Economic Development Plan for Greater Manchester, produced by Manchester Enterprises, presents an economic vision and strategic objectives for the area. The Plan also sets out in practicable terms what needs to be delivered during the next 3 years and beyond.
- 4.17 The focus of the Plan is on improving the economic competitiveness and performance of the local economy by developing its key economic assets and opportunities and addressing those barriers that limit both its growth and its ability to deliver local benefits to residents.
- 4.18 The provision of specialist industrial, commercial and local employment sites and facilities (including science and other parks) to serve the development of target sectors is seen as a key priority in helping to attract and retain investment, visitors and talent.
- 4.19 The Plan will provide the strategic framework for investment priorities for a range of agencies across Greater Manchester. It will also act as a framework for more detailed Local Authority and Local Strategic Partnership plans and establishes an integrated approach to the conurbation's needs.

### **Key Regional Issues**

- 4.20 Key regional issues emerging from the above include:
- The need to strengthen and diversify the local economy (RSS for the North West, GMS, GMEDP);

- The need to provide a range and choice of sites to meet different needs (RSS for the North West, RES, GMEDP);
- The need for economy in the use of land (RPG13);
- The need to regenerate the borough and revitalise the local economy (RSS for the North West, RES, GMS, GMEDP);
- The need to ensure sites are accessible for businesses and workers (RSS for the North West, RES, GMS).

## **5.0 LOCAL POLICY CONTEXT**

5.1 The local policy framework is provided by Oldham's Community Strategy 2002-2022, and Oldham Beyond – A Vision for the Borough of Oldham.

### **Oldham's Community Strategy 2002-2022 (OCS)**

5.2 Oldham's first Community Strategy was produced by the Oldham Strategic Partnership in 2002. It set out a vision for the future of the Borough, supported by objectives, priorities and targets.

5.3 The economic vision was described as follows: 'To create a Borough of well-educated people who have available good quality opportunities for employment and self employment. To create a vibrant, diverse and sustainable local economy which offers fullest and equal opportunity for all and a healthy and secure local, social and economic environment.'

5.4 Strategic objectives were:

- To enhance the Borough's competitiveness by investing in specialist and sectoral business development and support services;
- To promote the Borough as a place to live, learn, work and play;
- To encourage inward investment, create jobs and businesses and improve the competitiveness of existing businesses;



- To increase the engagement and contribution of the private sector locally and nationally in the regeneration and civic activity of the Borough;
- To improve access to and equality of employment opportunities;
- To build sustainable communities by harnessing the resources and expertise of local people and putting them at the heart of the process and
- To conserve and improve the natural and built environment to create areas where people would chose to live, learn, work and play.

5.5 The Community Strategy is currently being reviewed following further consultation and the publication of the Oldham Beyond report described below.

5.6 A new Economic Chapter is also being developed by Oldham's Economic Partnership that will reflect the changing circumstances. The new chapter will set out clear objectives, actions and targets that are consistent with the Regional Economic Strategy and the Greater Manchester Economic Development Plan.

5.7 Draft strategic objectives are:

- To improve the image of the Borough as a place for business and visitors in order to strengthen existing business and attract more inward investment;
- To maintain high economic activity in the Borough;
- To improve both access to and the quality of employment opportunities;
- To encourage sustainable economic regeneration;
- To conserve the best as well as improve the quality of the built environment and

- To increase the creation of new and the growth of existing business.

### **Oldham Beyond – A Vision for the Borough of Oldham, 2004 (OB)**

- 5.8 Oldham Beyond was commissioned by the Oldham Strategic Partnership (LSP) and the North West Development Agency (NWDA) to develop a 15-year vision and strategy for the renaissance of Oldham. The Study was published in April 2004 and sets out proposals for Oldham's renaissance, covering its people and communities, economy, transport, housing market and physical environment. It will find expression mainly through the LSP's review of Oldham's Community Strategy, and other strategies and plans that flow from the revised OCS.
- 5.9 The economic analysis carried out for the study showed that Oldham had successfully diversified following the loss of its textile industry. However the new areas of employment tended to perpetuate the Borough's low skill, low wage economy and are vulnerable to future decline.
- 5.10 Although many of Oldham's people will travel outside the Borough to work in the future (e.g. on nearby strategic development sites), Oldham must generate more wealth internally, by competing in the global and regional markets.
- 5.11 The Study concluded that Oldham should protect its employment base and continue to diversify its economy through inward investment and new economic activity. It must also tap into the growth potential of Greater Manchester and particularly the Knowledge Capital Initiative.
- 5.12 Several new initiatives were proposed under the following themes:

- Protecting jobs by ensuring that existing firms thrive and remain in the Borough;
- Attracting inward investment by exploiting opportunities in areas like Hollinwood and Mumps;
- Providing conditions where new businesses can be created;
- Supporting creative industries;
- Reusing the space in mills more intensively to promote economic activity;
- Exploiting the Borough's tourism assets;
- Creating areas for economic interaction between communities and
- Encouraging the development of social enterprises.

### **Key Local Issues**

5.13 Key local issues emerging from the above include:

- The need to strengthen and diversify the local economy (OCS, OB);
- The need to attract inward investment (OCS, OB);
- The need to provide a range and choice of sites to meet different needs (OCS, OB);
- The need for economy in the use of land and buildings (OB);
- The need to regenerate the Borough and revitalise the local economy (OCS, OB);
- The need to ensure that sites are accessible for businesses and workers (OCS).

## **6.0 OLDHAM'S REPLACEMENT UNITARY DEVELOPMENT PLAN 2001 – 2016 (RUDP)**

6.1 This section describes how the policies for Business, Industry and the Local Economy have evolved through the First Deposit and Revised Deposit stages.

### **General Principles**

6.2 The Draft RUDP's economic strategy is based on a number of fundamental principles:

- To support social inclusion and promote economic well being;
- To make better use of resources, including existing employment land;
- To promote new investment through the allocation of new sites for expansion and new investment;
- To improve accessibility and reduce the need to travel and
- To support the regeneration of older urban areas.

6.3 Six specific objectives are also set out. These reflect the key policy, regional and local issues highlighted in previous sections:

- To make better use of vacant land and underused and buildings in existing employment areas and consolidate their potential as centres of future business and industrial growth;
- To improve access to employment opportunities throughout the Borough and address economic disadvantage affecting certain sections of the community;
- To improve the diversity of the local economy and provide a broader range of jobs that can better withstand any future recession;

- To provide enough employment land to meet the needs of businesses, recognising that some sections of the Oldham workforce may be employed within neighbouring authorities;
- To provide a range of site for a variety of new employment uses, to meet the needs of new firms in the borough and existing companies that wish to expand and
- To provide a range of sites in locations that are accessible by a variety of transport modes.

6.4 The policies are then grouped under 2 headings;

- Business and Industrial Land Allocations;
- Existing Business and Industrial areas.

### **First Deposit Stage**

6.5 The First Deposit RUDP was published in October 2001 and was the subject of public consultation and a sustainability appraisal. A variety of objections (114 in total) and supporting representations (13 in total) were received to the Business, Industry and the Local Economy section.

6.6 Private interests often wanted a wider range of uses accepted in mixed-use allocations and Primary Employment Zones, and more flexibility in how applications are considered. In relation to sites, there were calls for boundary changes and for changing the employment allocations to alternative uses, e.g. housing and retail, or to protect the land, e.g. for transport or open space. Several objections were submitted to the loss of employment land in Saddleworth. Concern was also expressed about the potential negative impacts of industrial development on residential amenity, such as traffic impacts in Chadderton, Hollinwood and Shaw. Finally, requests were made by

Government Office North West, other agencies and private interests to clarify and add detail to the policies.

### **Revised Deposit Stage**

6.7 The Revised Deposit Plan was published in October 2003. Several changes were made, following consideration of the representations and objections, including:

- The title of the chapter was amended to signal the wide scope of the section's policies, covering a range of employment generating land uses. Changes to policies primarily addressed objectors' requests for more detail and clarity, and those wanting other policy objectives (in particular residential amenity or habitat and species protection) to have greater weight relative to economic objectives.
- The policy on tourism development (former B1.4) was deleted. After further consultation, it was concluded that tourism development would be delivered more effectively by identifying tourism uses and suitable locations for them, such as along the restored canals, throughout the section.
- The policy on office developments was changed to reflect Revised Regional Spatial Strategy published in March 2003 (now RSS for the North West) which stipulated that large office development must be located in town and district centres and other very accessible sites. This requirement is now in policy B1.5 a, which is also referred to in other relevant policies in the Plan.
- Some changes were also made to allocations and Primary Employment Zone (PEZ) designations. Some sites were deleted due to the granting of planning permission. The allocation of sites to the south of the Town Centre in the Economic Development

Zone was changed to exclude storage and distribution uses. A new mixed-use site was added at Huddersfield Road (“Hill Stores”) District Centre.

A summary of the current policies, incorporating the changes, is set out below:

### **B1 – Business and Industrial Land Allocations**

6.8 In allocating land for business purposes (including B1 – offices, B2 – general industry, B8 – warehousing and distribution), the Council has sought to:

- Provide employment opportunities across the Borough in locations that can be accessed easily by the local workforce;
- Provide sites of varying size with the ability to attract new employment opportunities;
- Provide enough land to enable existing firms to expand and
- Provide sites to meet the needs of the ‘growth’ sectors identified in the RSS for the North West and the North West Regional Economic Strategy.

6.9 It has also paid attention to Government Guidance (PPG1, PPG3, PPG4 and PPG 12), the Regional Spatial Strategy, the Regional Economic Strategy and local needs as set out in Oldham’s Community Strategy.

6.10 The adopted UDP identified 113 hectares of employment land. A comprehensive review of employment sites has been carried out (as recommended by PPG3 and RPG13) and 63 sites that were allocated for Business and Industry in the adopted UDP have been de-allocated. In undertaking the review, the Council paid particular attention to the availability of the sites within the plan period and opportunities for

regeneration. It also took account of the historic take-up rate of employment land and the fact that a proportion of new business and industrial development has taken place on land that was not allocated for employment uses nor within designated PEZs.

- 6.11 The Draft RUDP also recognises the role neighbouring authorities play in meeting some of Oldham's employment requirements. The strategic sites at Ashton Moss in Tameside, Kingsway in Rochdale and East Manchester are particularly significant.
- 6.12 Taking all these factors into account, the amount of land allocated for Business and industrial purposes has been reduced from 113 hectares in the adopted UDP to 74.3 hectares in the Draft RUDP.

### **B1.1 – Business and Industrial allocations**

- 6.13 Twenty three sites comprising 54.18 hectares are allocated specifically for business and industrial purposes (Use classes B1, B2 and B8) to meet the needs of existing and potential new businesses as recommended in PPG4. The sites are of varying sizes to meet the needs of different business and provide a broad employment base for Oldham. All sites have been allocated in the realistic expectation that they will become available during the plan period, and on the basis that that they have access to the necessary infrastructure.

### **B1.2 – Business and Office Allocations**

- 6.14 Seven sites comprising 20.12 hectares are allocated specifically for business, office and general industrial purposes (use classes B1 and B2).
- 6.15 These sites have been allocated to help achieve the clusters of high quality employment that RSS for the North West recommends. The grouping of high technology and complementary businesses in the



same area can create the kind of environment that encourage business growth.

6.16 Located at major transport nodes in Hollinwood and around Oldham Town Centre, the accessibility of these sites makes them suitable for higher densities of employment.

6.17 The policy will also help Oldham diversify its economy by attracting high technology and other growth businesses to quality locations.

### **B1.3 – Mixed Use Allocations**

6.18 Four sites are allocated for mixed-use developments to help accommodate new households, promote economic investment and assist urban regeneration, as recommended by PPG3.

6.19 The allocations take account of the distinctive characteristics of the sites and the regeneration opportunities they offer.

### **B1.5 – Business, Office and Industrial development on unallocated land**

6.20 This policy recognises that all businesses, whether in defined employment areas or otherwise, contribute to the local economy and increase employment choice for local people. Some new employment developments (e.g. small office uses) can therefore be located in residential areas without having a detrimental impact. They can also promote a spread of employment across the Borough, helping reduce the need to travel.

6.21 However, other developments that generate significant numbers of trips need to be located in central or accessible locations, as set out in the Regional Spatial Strategy.

## **B1.6 – Working from Home**

- 6.22 This policy recognises that working patterns are changing and that there has been a growth in working from home in recent years. Proposals to use parts of dwellings are permitted in certain circumstances.

## **B1.7 – Freight Generating Developments**

- 6.23 The Council will only permit development proposals that generate substantial freight movements in areas that are easily accessible to the primary road and rail network and are away from town centres, district centres and residential areas where they would cause highway safety, amenity or environmental problems.

## **B2 – Existing Business and Industrial Areas**

- 6.24 The Draft RUDP contains 3 policies to help protect the Borough's existing Business and Industrial areas.

### **B2.1 – Primary Employment Zones (PEZs)**

- 6.25 Primary Employment Zones (PEZs) have been designated in 33 areas of the Borough where business and industry dominate. PEZs are expected to continue to contribute significant levels of employment throughout the plan period and are considered to be the most suitable location for much economic development. They reduce the need to develop open or greenfield land, whilst minimising potential conflict with residential areas.
- 6.26 By allocating PEZs, the Council aims to provide continuing opportunities for existing firms to expand and for new firms to locate. Situated mainly in areas with good public transport accessibility, PEZs also offer a range of jobs that the local workforce can access easily. A

wide range of business uses is permitted within PEZs to encourage economic diversity and improve the local economy's resilience to future recession. However, housing development is specifically excluded.

## **B2.2 – Protection of Existing Employment Sites outside PEZs**

- 6.27 The Draft RUDP recognises that many businesses are located in areas outside PEZs and these may also make a vital contribution to the local economy. Many are located close to residential areas and help contribute to the sustainable transport objectives of the plan.
- 6.28 This policy seeks to protect existing employment areas unless:
- continued employment would have significant impact on residential amenity, traffic or highway safety or
  - it can be proven that there is no current or likely future demand for them to be used for employment purposes.
- 6.29 In the latter case, the Council will require evidence that the land or premises have been marketed at a reasonable price, for an appropriate period and in appropriate trade press or elsewhere in order to be satisfied that there is no realistic demand for its continued employment use.
- 6.30 In these situations, the Council will look more favourably upon proposals for mixed use rather than residential development, as this would mean a continuing contribution towards the local economy and employment.
- 6.31 The Council also recognises the value of mills, some of which are protected for their historical and/or architectural value. Proposals for non-employment use would only be considered in exceptional circumstances, such as to secure the retention and refurbishment of a listed mill or locally important building.

## **B2.3 – Employment uses in the Green Belt, a local green gap or land reserved for future development**

- 6.32 The Draft RUDP recognises that there are a number of businesses operating in the Green Belt or other ‘protected land’, providing valuable employment and assisting the rural economy as recommended by the Government in PPG7.
- 6.33 This policy offers such businesses some flexibility to adapt to, and capitalise on changing economic circumstances. The Council would weigh the economic and employment benefits of development proposals against their impact on the Green Belt.

## **7.0 OUTSTANDING ISSUES**

- 7.1 This section summarises the outstanding issues raised by objectors and sets out the Council’s response.
- 7.2 As a result of the changes made at Revised Deposit Stage, 2 objections were unconditionally withdrawn and 13 were conditionally withdrawn. A further 3 objections were partially withdrawn, but this still left 100 objections outstanding from the first deposit stage.
- 7.3 However, a further 104 new objections were received, leaving an overall total of 204 objections outstanding. 7 new representations of support were also received.
- 7.4 62 of the objections related to general policy issues; 142 objections related to site specific issues.
- 7.5 The main policy issues raised by objectors include the following:

## **B1.1 – Business and Industrial Allocations**

- Request to consider the proposed changes to PPG3 (Housing) and the viability of future employment use in reviewing employment sites.
- Request to protect employment land in Saddleworth.
- Request to focus new development on the redevelopment of existing sites across the Borough, rather than new build in Saddleworth.
- Request to retain the mills and consider the impact of employment uses on listed buildings.
- Request to include specific policies for sites along the Rochdale and Huddersfield canals in order to harness their economic potential.

### **B1.2 Office and Business Allocations**

- Request to protect the rail corridor for rail use in the event of Metrolink not proceeding.

### **B1.3 Mixed Use Allocations**

- Request to protect employment land in Saddleworth.
- Request to be more flexible in respect of retail, tourism and other uses.
- Request to ensure that developments proceed in accordance with agreed phasing schemes.

### **B1.5 Business, office and industrial development on unallocated land**

- Request to relax the threshold in respect of office developments and amend the definition of near a public interchange and allow limited infill.
- Request to reword policy to reflect RSS for the Northwest.
- Request to ensure policy protects residential areas from the impact of large developments.

### **B1.7 Freight Generating Developments**

- Request to make policy supportive of movement of goods by rail.
- Request to delete waste management from list of uses allowed within PEZs.

### **B2.1 Primary Employment Zones**

- Request to relax thresholds on local needs retailing, office and leisure developments.
- Request to broaden range of acceptable uses to include retail, medically related uses and residential.
- Objection to loss of PEZ land in Saddleworth.

### **B2.2 Protection of existing employment sites outside PEZs**

- Request to change policy to allow other types of development, including housing.
- Request to relax marketing requirements.

7.6 Several requests were also made to clarify and add detail to policies. The Council's response to these issues is set out in Appendix 2.

7.7 Many of the outstanding site-specific objections raised similar issues as the policy objections:

- Request for outright de-allocation or a change from a business and industry allocation to the more flexible mixed use or PEZ designation. This echoes a desire for more flexibility raised in policy objections.
- Request for permitting housing or retail rather than employment uses.
- Request to retain business and industry allocations and PEZs in Saddleworth rather than allow mixed uses, including housing. Objectors were concerned that an increase in population and shift in uses would change the character of their communities.

- Request to protect the rail corridor in the event of Metrolink not proceeding, in respect of allocations on, and along, the Oldham Loop Line to the south of the Town Centre.

7.8 Other objections conveyed new themes:

- Opposition to business and industrial uses because of the traffic (lorry movements in particular) and pollution such uses generate. The objections related to sites in primarily, though not exclusively, the denser urban areas of the Borough.
- Request for a change in allocation to recreational open space or local green gap.

7.9 The Council will respond to objections around specific sites in individual proofs.

## **8.0 PRE INQUIRY CHANGES**

8.1 Having considered the outstanding objections outlined in Section 7 and recent developments in relation to Housing Market Renewal, the Council feels that 3 further policy changes are necessary. The first is a minor alteration to the wording of Policy B1.5 to reflect the RSS for the North West. The second and third changes relate to existing business and industrial areas and Housing Market Renewal.

### **Policy B1.5 Business Office and Industrial Development on Unallocated Land**

8.2 The Council has been requested to alter the wording of policy B1.5 to more accurately reflect policies EC8 and DP1 of the RSS for the North West. Changes are sought to criteria (a) and (b).

8.3 The Council accepts the request in respect of criterion (a) and proposes to replace the phrase 'unless the applicant can justify an

exception' with 'within urban areas'. Criterion (a) would then read as follows:

*(a) in the case of new office development (B1(a) and A2) that generates significant numbers of trips, it is located on sites in and adjoining the Town and District Centres, or near major public transport interchanges within urban areas.*

8.4 It is also proposed to delete the following wording from paragraph 5.18 in the reasoned justification '*Where such development is proposed elsewhere, the applicant will need to demonstrate that no other suitable sites are available or that other material considerations apply. Measures to improve the site's accessibility by non-car modes will also be required.*'

8.5 However, the Council does not propose to make any further changes to criterion (b) to reflect the sequential approach set out in RSS Policy DP1. Although the Draft RUDP has taken account of the sequential approach in allocating sites for development, the Council does not feel that it would be appropriate to rigidly follow this approach in Policy B1.5. The Council feels that it would be unreasonable to require applicants to demonstrate that no sequentially preferable sites were available. It could also make it more difficult to promote a spread of employment across all areas of the Borough.

### **Existing Business and Industrial Areas and Housing Market Renewal**

8.6 Oldham is a Housing Market Renewal Pathfinder authority and is committed to a long-term regeneration programme that will transform its housing markets, create sustainable communities and lead to greater community cohesion. Detailed neighbourhood planning work carried out in the first 2 intervention areas (Derker and Werneth / Freehold), has highlighted the need to consider using some existing



and former employment land for housing as part of comprehensive regeneration plans for the areas. In Derker, some Primary Employment Zone (PEZ) land is recommended for housing; in Werneth / Freehold, two existing industrial areas and a former textile mill are recommended for housing and mixed-use developments respectively.

- 8.7 The Council has also commissioned consultants to prepare a Strategic Regeneration Framework for another part of Oldham's Housing Market Renewal Area – Inner Oldham – 'Southern Area'. This will set out a framework for physical regeneration of other neighbourhoods requiring intervention and will form the basis for the next Housing Market Renewal Prospectus submission to the Office of the Deputy Prime Minister (ODPM) in summer 2005. The framework will provide a detailed analysis of the study area and will set out a series of spatial strategies, including recommendations on land uses. It is possible that further employment land will be recommended for housing and/or mixed-use development as part of this comprehensive approach to regeneration.
- 8.8 To facilitate such regeneration, it is proposed to make changes to B2.1 (Primary Employment Zones (PEZs)) and B2.2 (Protection of Existing Employment Sites outside PEZs). The proposed changes aim to optimise the regenerative effect of the HMR programme without compromising the objectives of the RUDP in respect of employment.

### **B2.1 Primary Employment Zones**

- 8.9 Additional text is proposed at the end of the policy –

*'Housing and/or related community uses (as defined in Policy CF1.2) will not be permitted unless:*

1. *The development forms part of a local master plan approved by the Council and contributes directly to the Council's strategy for Housing Market Renewal; and*
2. *The development would help achieve the local and strategic objectives of the HMR programme; and*
3. *The release of the site for housing would not prejudice the plan's objectives in relation to business, industry and the local economy.*

*To ensure that the release of the site for housing does not prejudice the plan's objectives in relation to business, industry and the local economy, housing would only be permitted in the following circumstances:*

1. *As part of a mixed use development scheme including employment uses which are permitted within this policy or*
2. *In the case of schemes for housing and/or related community uses only:*
  - (a) *the applicant makes replacement provision for business, industry and employment uses on terms to be agreed with the Council, or*
  - (b) *the applicant makes a financial contribution to a local employment initiative, through a Section 106 Planning Obligation to be agreed with the Council.*

*The housing and other elements of a mixed-use development scheme should be developed in accordance with a phasing scheme to be agreed with the Council.*

8.10 It is also proposed to add additional paragraphs to the reasoned justification -

*'Although the primary purpose of the PEZ policy is to protect existing employment areas, the Council believes there are special circumstances where housing development may be considered.*

*Oldham is a Housing Market Renewal (HMR) Pathfinder authority and is committed to a long-term regeneration programme that will transform its housing markets, create sustainable communities and lead to greater community cohesion. Detailed master plans may demonstrate that the redevelopment of some PEZ land for housing and/or related community uses (as defined by Policy CF1.2) may be justified in relation to HMR objectives and the regeneration of the area as a whole. The policy therefore allows some flexibility in the uses permitted within PEZs, but only where the Council has approved detailed master plans and where the development would contribute directly to the HMR programme. The onus will be on the applicant to demonstrate that the development makes a clear contribution to the local and strategic objectives of the HMR programme. For the purposes of this policy, master plans may include detailed plans for neighbourhoods or sites contributing to the HMR programme.*

*In considering the release of PEZ land for other purposes, the Council will assess the benefits of redeveloping the site for housing or mixed-use development against the loss of the site for employment purposes. The requirement to make replacement provision or, if that is not possible, to make a financial contribution to a local employment initiative is to ensure that the RUDP's objectives in relation to Business, Industry and the Local Economy are not prejudiced. The financial contribution would be negotiated on a site by site basis and could be used for a number of purposes such as:*

- To help relocate an existing business and safeguard employment;*
- To help finance the improvement of infrastructure in the local area or*
- To help finance a training initiative to benefit local people.*

*The Council will prepare a Supplementary Planning Document in due course to explain how the financial contributions will be calculated.'*

## **B2.2 Protection of Existing Employment Sites outside PEZs**

8.11 An additional clause (d) is proposed at the end of the policy–

*or*

*d. The proposal is for housing and/or a related community use (as defined by Policy CF1.2) forming part of a local master plan approved by the Council and which contributes directly to the Council's strategy for Housing Market Renewal*

8.12 An additional paragraph is also proposed to the reasoned justification -

*However, Oldham is also a Housing Market Renewal Pathfinder authority and is committed to a long-term regeneration programme that will transform its housing markets, create sustainable communities and lead to greater community cohesion. Detailed master plans may demonstrate that the redevelopment of some existing or former employment sites for housing and/or related community uses (as defined by Policy CF1.2) may be justified in relation to HMR objectives and the regeneration of the area as a whole. The policy therefore allows some flexibility in the uses permitted, but only where the Council has approved detailed master plans and where the development would contribute directly to the HMR programme. The onus will be on the applicant to demonstrate that the development makes a clear contribution to the local and strategic objectives of the HMR programme. For the purposes of this policy, master plans may include detailed plans for neighbourhoods or sites contributing to the HMR programme.*

## **9.0 CONCLUSIONS**

- 9.1 The policies, as revised by the proposed Pre-Inquiry Changes, comply with national, regional and local policies and objectives and are consistent with urban regeneration programmes, in particular the Housing Market Renewal Fund.
- 9.2 The allocations in the RUDP provide sites for business and industrial uses in a range of sizes to accommodate existing and new firms. In conjunction with the Primary Employment Zones, these provide employment development land in locations across the Borough. The permitted uses capitalise on distinctive site advantages such as major transport nodes, gateways to the Town Centre and opportunities for tourism, which promotes sustainable regeneration.

## **APPENDIX 1**

### **LIST OF CORE DOCUMENTS REFERRED TO IN TOPIC PAPER**

- Planning Policy Guidance Note 1 (PPG1): General Policies and Principles (February 1997)
- Planning Policy Guidance Note 4 (PPG4) - Industrial and Commercial Development and Small Firms (November 1992)
- Planning Policy Guidance Note 12 (PPG 12): Development Plans (December 1999)
- Planning Policy Guidance Note 13 (PPG13) – Transport (March 2001)
- Regional Spatial Strategy (RSS) for the North West, 2003
- Regional Economic Strategy (RES), 2003
- The Greater Manchester Strategy (GMS), 2003
- Greater Manchester Economic Development Plan (GMEDP) 2004/5 – 2006/7, 2004
- Oldham’s Community Strategy 2002-2022 (OCS), 2002
- Oldham Beyond (OB) – A Vision for the Borough of Oldham, 2004
- Oldham Replacement Unitary Development Plan (RUDP) First Deposit Draft, October 2001
- Oldham Replacement Unitary Development Plan (RUDP) Revised Deposit Draft, October 2003
- Oldham Unitary Development Plan (UDP), Adopted April 1996
- Oldham Business and Industrial Land Development 1999 – 2004, December 2004 (for information purposes)

## APPENDIX 2

<b>SUMMARY OF OLDHAM MBC RESPONSES TO MAIN ISSUES RAISED BY OBJECTORS</b>	
<b>POLICY / ISSUE</b>	<b>RESPONSE</b>
<p><b>B1.1 Business and Industry allocations</b></p> <p>Request to consider the proposed changes to PPG3 (Housing) and the viability of future employment use in reviewing employment sites</p>	<p>The comprehensive review of employment sites did consider instances where employment development uses or future development is no longer viable, as recommended by PPG3. The review was also informed by regeneration strategies and programmes such as SRB6, and Housing Market Renewal. No further changes to the Plan were made as a result of the proposed PPG3 changes since these are still in draft form and have not been published.</p> <p>As a result of the review, several sites previously allocated for business and industry were de-allocated in the First Deposit Plan. 11 sites were de-allocated altogether; many more were allocated as PEZs to encourage a greater range of employment uses and one site at Ramsay Street Chadderton was allocated for housing. 3 PEZs were also de-allocated; the boundaries of several other PEZs were altered to reflect changing circumstances and others were reallocated for other purposes including housing and mixed-use developments. A full list of the changes to site allocations and PEZs is contained in Appendix A of the RUDP.</p> <p>Further changes have also been made to site allocations and PEZs in the Revised Deposit Draft RUDP--some as a result of representations and some to bring the plan up to date and reflect changing circumstances. The wording to policies and reasoned justification has also been changed.</p> <p>Pre Inquiry changes are also proposed to Policies B2.1 (Primary Employment Zones) and B2.2 (Protection of exiting employment sites outside PEZs), following detailed work carried for the Housing Market Renewal neighbourhoods. These changes are listed in Section 8.</p>
<p>Request to protect employment land in Saddleworth</p>	<p>As a matter of principle, the majority of large existing employment sites in Saddleworth continue to be protected under the Primary Employment Zone policy B2.1. A few changes in allocations were made after an assessment of each site's characteristics and the Borough's land use needs. The new designations (e.g. Mixed-use developments) are designed to stimulate employment development or secure the retention of landmark buildings. Existing employment sites outside PEZs are protected under policy B2.2.</p>

<p>Request to focus new development on the redevelopment of existing sites across the borough, rather than new build in Saddleworth;</p> <p>Request to retain the mills and consider the impact of employment uses on listed buildings</p> <p>Request to include specific policies for sites along the Rochdale and Huddersfield canals in order to harness their economic potential</p>	<p>The Council agrees that economic activity should continue to be focussed on existing industrial and commercial areas of the Borough. However, there is a need to identify some new sites for development in order to meet the demand from existing and future businesses whose needs may not be met through the existing supply of premises. These new sites are predominantly located on the West side of the borough. Only one site in Saddleworth, adjacent to existing industry in Diggle, is allocated for business and industry.</p> <p>The Council recognises that mills can make efficient use of land and provide relatively inexpensive space for industry, storage and distribution. Some mills also have great historical and /or architectural value and are protected by policies in the Design and Conservation sections. However, some mill buildings may not be suited to modern business and industrial operations. Maintenance and refurbishment costs can also make such premises expensive to retain in employment use. In most cases, the Council will seek to retain employment uses on the site and may allow the site to be redeveloped for employment purposes. In other cases, where continuing employment would be unacceptable in terms of impact on highway safety or residential amenity, non employment uses may be permitted in order to secure the retention of a listed mill or locally important building. Additional text has been added at paragraph 5.28 to this effect.</p> <p>The Council also attaches a high priority to protecting and enhancing all significant and valuable elements of the historic environment. All development proposals affecting conservation areas and/or listed buildings will be considered against policies within the 'Conservation of the Historic Environment' section of the plan.</p> <p>The Council is keen to exploit the economic regeneration potential of both the Rochdale and Huddersfield Canals and has allocated key sites for a variety of purposes, including mixed-use developments to help stimulate investment. It has also worked with partners on the Rochdale Canal Trust to prepare a Regeneration Strategy for the Canal Corridor. The Council agrees that high quality development should be encouraged in both canal corridors. Any new development proposals will be judged against the policies within the Design and Open Environment sections of the RUDP and against guidelines set out in other strategies (e.g. the Rochdale Canal Corridor Strategy and Oldham's Tourism Strategy) New text has been added in paragraph 5.10 to this effect.</p>
<p><b>B1.2 Business and office allocations</b></p> <p>Request to protect the rail corridor for rail use in the event of Metrolink not proceeding</p>	<p>New text has been added to Policy B1.2 and to paragraph 5.14 to confirm that the availability of sites at Union Street West (B1.2.3) and Mumps (B1.2.4) is subject to the final details of the Metrolink contract. If Metrolink is completed along the Town Centre route, the Council cannot see any</p>



	<p>merit in retaining these sites for possible rail use since the rest of the Metrolink route would not be compatible with heavy rail use. If Metrolink did not proceed at all and the rail link was retained, the Council acknowledges that these sites would not be available for development unless in the case of Union Street West it was possible to build a new tunnel and develop the land over the line of the tunnel. No further changes to the policy are proposed.</p>
<p><b>B1.3 Mixed Use Allocations</b></p> <p>Request to protect employment land in Saddleworth</p> <p>Request to be more flexible in respect of retail, tourism and other uses</p> <p>Request to ensure that developments proceed in accordance with agreed phasing schemes.</p>	<p>As a matter of principle, the majority of employment sites in Saddleworth are protected under the Primary Employment Zone policy. However, the Council has designated 2 former PEZs in this area for mixed-use developments to help stimulate investment and in recognition of regeneration potential that both sites offer. The Council believes that the policy fully supports the provision and protection of employment opportunities in the Saddleworth area.</p> <p>The policy has been reworded to clarify the range of uses (including B1 and B2 uses) that would be permitted in mixed-use developments. In the case of the 2 sites in Saddleworth, the proportion of residential development that would be permitted has also been clarified. The reasoned justification has been strengthened to confirm that the designated sites offer particular opportunities for regeneration in accordance with PPG3.</p> <p>The policy does not preclude retail and tourism uses in all mixed development schemes. The policy has been reworded to clarify the range of uses that would be permitted on each of the 4 sites. In the case of Frenches Wharf/Wellington Road Greenfield site, tourism and some retail uses would be permitted, subject to conformity with the retail and leisure policies in the plan. Retail uses would also be permitted at the Huddersfield Road / Dunkerley Street site again subject to conformity with the retail and leisure policies of the plan.</p> <p>The Council agrees that mixed-use development sites must be protected from 'cherry picking' by developers. The wording of the policy has been clarified to ensure that non-residential floor space on each site is delivered in accordance with a phasing scheme to be agreed with the Council.</p>
<p><b>B1.5 Development on Unallocated Land</b></p> <p>Request to relax the threshold in respect of office developments and amend the definition of near a public interchange and allow limited infill;</p>	<p>The policy was reworded to take account of revisions to Regional Spatial Strategy (RSS for the North West) and in particular Policy EC8 (Town Centres – Retail, Leisure and Office Development) which seeks to protect and sustain existing town centres. Clause (a) of Policy 1.5 only applies to new developments that generate significant numbers of trips. It also allows for exceptions where the applicant can provide a justification. Where developments are proposed elsewhere, the onus is on the applicant to show that no other suitable</p>

<p>Request to reword policy to reflect the Regional Spatial Strategy (RPG13)</p> <p>Request to ensure policy protects residential areas from impact of large developments</p>	<p>sites are available or that other material considerations apply.</p> <p>The policy does not prohibit limited infilling or redevelopment, provided that proposals meet the criteria set out in the policy. The policy has been reworded to clarify the criteria against which proposals for new development will be considered.</p> <p>The policy was reworded at Revised Deposit Stage to take account of revisions to the Regional Spatial Strategy (RSS) and in particular Policy EC8 (Town Centres – Retail, Leisure and Office Development) which seeks to protect and sustain existing town centres.</p> <p>The Council proposes to make a further change to criterion (a) by inserting the words ‘within urban areas’ after ‘major public transport interchanges’. It also proposes to delete the phrase ‘unless the applicant can justify an exception’.</p> <p>It is also proposed to delete the following wording from paragraph 5.18 in the reasoned justification <i>‘Where such development is proposed elsewhere, the applicant will need to demonstrate that no other suitable sites are available or that other material considerations apply. Measures to improve the site’s accessibility by non-car modes will also be required.’</i></p> <p>However, the Council does not propose to make any further changes to criterion (b) to reflect the sequential approach set out in RSS Policy DP1. Although the RUDP has taken account of the sequential approach in allocating sites for development, the Council does not feel that it would be appropriate to rigidly follow this approach in Policy B1.5. The Council feels that it would be unreasonable to require applicants to demonstrate that no sequentially preferable sites were available. It could also make it more difficult to promote a spread of employment across all areas of the Borough.</p> <p>The policy has been reworded to broaden the range of uses covered by the policy and strengthen the criteria against which new proposals will be considered. New text has also been added at paragraph 5.17 to confirm that the Council will refuse permission where new development or a proposal to perpetuate or extend an existing use does not meet the requirements of policies on residential amenity, traffic and highway safety.</p>
<p><b>B1.7 Freight generating Developments</b></p> <p>Request to make policy supportive of movement of goods by rail</p>	<p>Although the Council supports the movement of goods by rail where this is possible, it does not feel that the policy should be redrafted as suggested. The amended policy does not preclude ‘development which will encourage the transfer of freight from road to rail, including the development of freight handling facilities’ provided that sites are away from the Town Centre, District Centres and residential areas where they would cause highway safety, amenity or environmental problems.</p>

<p><b>B2.1 Primary Employment Zones (PEZs)</b></p> <p>Request to delete waste management from list of uses allowed within PEZS</p> <p>Request to relax thresholds on local needs retailing, office and leisure developments</p> <p>Request to broaden range of acceptable uses to include retail, medically related uses and residential</p>	<p>Primary Employment Zones are considered the most appropriate locations for general industrial uses, including many waste management facilities. However, the Council recognises the need to minimise potential conflict with adjacent housing areas and protect residential amenity. Additional text has been added at paragraph 5.22 to ensure that any development proposals adjacent to residential areas comply with other RUDP policies on design, landscaping, access and amenity, as set out in the Design, Transport and Natural Resources and Environmental Quality sections.</p> <p>The local shopping needs threshold has already been increased from 100 square metres in the Adopted UDP to 300 metres in the Replacement UDP. The Council feels that this is a more realistic threshold for local needs retailing, but does not agree that this is unduly restrictive. Although local needs retailing may be different in Primary Employment Zones the Council does not feel that this in itself justifies an increase in the threshold.</p> <p>To ensure a consistent approach to local needs retailing in all areas, the wording of the policy has been clarified and linked to the requirements of policy S2.3 (New shops serving local needs).</p> <p>However, the Council is concerned about the cumulative impact of retail proposals both within and outside PEZs. A Pre Inquiry Change to the policy is proposed to policy S2.3 to ensure that the cumulative effects of other retail permissions and proposals are taken into account. This is a new objection.</p> <p>Primary Employment Zones are designated specifically to protect existing industrial and business areas and help maintain a supply of land for business and employment purposes. Priority is therefore given to the range of uses set out in the policy. Broadening the range of acceptable uses to include retail (beyond what is currently allowed) would weaken the policy and defeat its main purpose. It would also conflict with the retail and leisure policies of the plan, as well as PPG6 (Town Centre and Retail Developments, 1996) and RSS for the Northwest.</p> <p>Whilst hospital and medically related services do provide jobs, the Council feels that these services should be located where they can best serve the community and should not be directed towards PEZs. However, the Council also recognises that some hospital and medically related uses will be covered under the provisions of the General Permitted Development Order. PEZs do not exclude such development where it is carried out in accordance with the appropriate statutes and regulations. Additional text has been added to paragraph 5.23 to this effect.</p>

<p>Request to relax policy on Office developments in PEZs</p> <p>Objection to loss of PEZ land in Saddleworth</p>	<p>The Council considers that leisure facilities should be located in existing centres where there is a good choice of public transport. However, it accepts that an exception should be made for facilities that meet local needs and help reduce the need to travel. The threshold of 500 square metres has been set to cover this type of development, such as a small gym or exercise studio. The element of policy relating to leisure developments has been reworded so that it is consistent with policy S2.4 (Local leisure facilities).</p> <p>The Council also recognises that there may be special circumstances where residential development may be permitted. Detailed neighbourhood planning work carried out as part of the Housing Market Renewal Programme has highlighted the need to consider using some existing and former employment land for housing as part of a comprehensive regeneration plans for the areas. Pre Inquiry Changes are therefore proposed to policies B2.1 and B2.2 as set out in Section 8.</p> <p>Policy B1.5 was reworded to take account of revisions to RSS for the Northwest and in particular Policy EC8 (Town Centres – Retail, Leisure and Office Development) which seeks to protect and sustain existing town centres.</p> <p>The policy does not preclude office developments in PEZs. Clause (a) only applies to new developments that generate significant numbers of trips, as required by RSS and Policy EC8. Clause (a) also allows for exceptions where the applicant can provide a justification. Where developments are proposed elsewhere, the onus is on the applicant to show that no other suitable sites are available or that other material considerations apply. The objector’s proposal to remove the reference to ‘major public transport interchange’ would conflict with RSS and in particular Policy EC8.</p> <p>As a matter of principle, the majority of existing employment sites in Saddleworth continue to be protected under this policy. A few changes to site allocations were made after an assessment of each site’s characteristics and the Borough’s land use needs. The new designations (e.g. Mixed-use developments) are designed to stimulate employment development as part of a wider development package. It is not accepted that this approach is to the detriment of the local economy.</p>
<p><b>B2.2 Protection of sites outside PEZs</b></p> <p>Request to change policy to allow other types of development, including housing</p>	<p>The policy is designed to protect existing industrial and business areas outside PEZs and help maintain a supply of land for business and employment purposes. The policy does not preclude alternative uses including housing, but sets out criteria that such proposals would have to meet. Proposals that provide employment will be favoured over those that do not. Additional text has been added to paragraph 5.27 to clarify how the policy will be applied.</p>

<p>Request to relax marketing requirements</p>	<p>However, the Council does recognise that there may be other special circumstances where residential development may be permitted. Detailed neighbourhood planning work carried out as part of the Housing Market Renewal Programme has highlighted the need to consider using some existing and former employment land for housing as part of a comprehensive regeneration plans for the areas. Pre Inquiry Changes are therefore proposed to policy B2.2 as set out in Section 8.</p> <p>The Council does not agree that the marketing requirement is unduly onerous. Previous objections to the marketing issue have been taken into account and the requirement to market a site for a period of at least 6 months has been removed. The policy now requires the site to be marketed for employment uses on terms acceptable to the Council in relation to price, publicity and the period marketed without generating a reasonable offer of purchase.</p>
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## Appendix 3

### Employment Land Take Up in Oldham 1985 - 2004

The figures cover development of Business (B1), General Industry (B2) and Warehouse and Distribution (B8) of the Use Classes Order. Figures for 1999 to 2002 were combined as no annual report was submitted during that period. The national and regional monitoring regime was changed from the calendar to the financial year, affecting figures for the period 2003 – 2004. A report on business and industrial land development in Oldham from January 1999 to March 2004, centring on land take-up, will be published for information purposes in December 2004.

Year	Land take up (hectares)
1985	3.10
1986	3.70
1987	11.0
1988	7.50
1989	21.25
1990	20.00
1991	4.87
1992	7.10
1993	1.30
1994	8.83
1995	5.47
1996	5.26
1997	16.90
1998	8.15
1999 -2002	28.28
2003-2004*	7.97
<b>Total</b>	160.68
<b>Annual Average for 1985 - 2003**</b>	8.37
<b>Annual Average for 1996 - 2003**</b>	8.12

\* The change from calendar year to financial year, in line with national and regional monitoring regime, means this figure covers the 15 month period from January 2003 to March 2004.

\*\* Based on an adjusted take-up of 6.38 for calendar year 2003 ( $7.97 \times 12/15$ )