

## **OLDHAM METROPOLITAN BOROUGH COUNCIL**

### **PINS FRONTLOADING VISIT: 7/01/10**

#### **Attendance:**

R Punshon – Planning Inspectorate  
C Bamber – GONW  
A Gaffar – GONW  
G Brownridge - OMBC  
A Hitchen - OMBC  
C Moran - OMBC  
P McGrath – OMBC  
S Stansfield – OMBC

#### **Purpose of visit:**

The purpose of Frontloading visits is to consider what has been done so far in preparation of the Development Plan Document (DPD) and to identify those issues and questions which, at this stage, appear potentially problematic in terms of soundness.

No attempt has been made by PINS to reach any conclusions on the material submitted, to confirm the adequacy of the work done so far or to endorse any part of the DPD as sound. In any event, this would not have been possible given that the DPD is only at an early stage in the preparation process and in the time available. This note should not therefore be taken as pre-judging the likely outcome of the Examination of the DPD.

Any guidance provided by this Note will be specific to Oldham. It should not be assumed that it is necessarily applicable to other authorities in other circumstances.

#### **The Note:**

Current practise is that the Note will become a Public Document and will appear on the Core Document list. The Examining Inspector will be provided with a copy. It is stressed that the Note is advisory only and does not constitute a formal part of the Examination process. The Council should make the status of the Note clear to those persons to whom copies are provided.

#### **Examination:**

The Examining Inspector may seek an Exploratory Meeting or a Procedural Meeting with the Council, GONW and other parties ahead of the Pre-Examination Meeting and Hearing Sessions. The Inspector advised that the Council should take this as an early opportunity to identify areas where the Inspector may require additional information or an explanation of various matters which he/she feels will need to be addressed. The Council is advised to make full use of the potential of such Meetings.

## **GENERAL POINTS:**

### **Preferred Option consultation**

The meeting was opened by the Council who explained the background to the document which had been provided to the Inspector – the 'Refined Options' document. The Inspector understood that this document was intended to provide the basis for a Preferred Options document which would be the subject of targeted consultation ahead of the Publication of the DPD. However, the Council has subsequently corrected the Inspector's misunderstanding of the position. The Council has clarified that it undertook 'pre-Publication' consultation on a 'Preferred Options' document in the spring and that the 'Refined Options' document was a further iteration of that 'Preferred Options' document.

At the meeting the Inspector advised that there is no requirement to undertake a pre-Publication consultation stage. However, in the Inspector's view it is vital that as many representations as possible are addressed before Publication stage. Consultation at the Publication stage of the DPD can generate very large numbers of representations if the content of the DPD is substantially different to the content of earlier consultation documents. These representations would need to be considered by the Inspector through the Examination process making it a much more costly exercise. It would be more sensible to adopt a process which draws out these substantive representations at an intermediate stage and allows them to be, so far as is possible, properly addressed before publication.

It is important that this intermediate stage should draw out the representations. In these circumstances the Inspector considered that it would be best that the pre-Publication consultation document should appear as a Draft DPD and that the consultation exercise should, so far as possible, reflect the formal consultation processes. The process is more likely to be successful if the Council's message is that 'This WILL be the DPD which will be published and submitted for examination unless you make your representations NOW.'

The Inspector was NOT of the view that the Council should undertake a full consultation exercise on the 'Refined Options' document. In his view the document was too unwieldy and its essential messages were too obscured to effectively draw out meaningful representations. He suggested that any further pre-Publication consultation should be undertaken on the basis of a much more concise and focussed document drawn from the 'Refined Options' document, which concentrated on the Main Issues, Vision and Policies and which 'stripped out' much of the descriptive detail.

The Draft DPD could be accompanied by a separate document setting out the reasons why the Council chose the Preferred Options, why other options were discounted and any necessary background.

### **Format of the DPD**

The Council explained that the DPD would comprise a Core Strategy (CS) with elements of a Development Management (DM) DPD. The Council considered that such a format would enable it to bring forward some DPD provisions more effectively and speedily. The Council stated that this format had earlier been agreed by GONW. Whilst GONW did not raise any objection to this basic format, it considered that the advice which it had previously provided regarding the way in which the 'strategy' and development management' issues had been combined in policies may have been misinterpreted by the Council. It was the Inspector's view that the Council's adoption of this format was the source of a great deal of confusion in the DPD in that 'strategic' policies and detailed 'development management' policies had become muddled together with the result that the Council's 'strategy' had become lost amongst the wealth of detail which had been included.

In the Inspector's opinion the CS was the framework on which all subsequent DPDs would depend. It was important therefore that the 'Strategy' should be clearly defined and should be durable for the plan period. By including large amounts of detailed provisions which would inevitably change over time, the 'strategic' policies could become rapidly out-dated. The Inspector suggested that, given the importance of the CS to the whole process, it would be best if it was prepared as a separate document. However, if the Council opted to proceed with the hybrid DPD as it intended, the Inspector was of the opinion that the 'strategic' elements should be clearly separated from the 'development management' policies perhaps into a Part 1 and Part 2 of the DPD. This would enable the strategy to be more clearly defined and would enable changes to be made to the 'development management' policies without the need to change policies which set out the strategy.

In the Inspector's view the document which had been submitted was far too long to serve as a basis for the Publication Plan or indeed the Preferred Option consultation version. The first 60 or so pages were essentially descriptive and repetitive and those parts which sought to impart important information such as Main Issues, Key Challenges, Vision, Key Objectives were subsumed in a wealth of detailed points. It may be that this arose from the hybrid nature of the DPD and that the Council was effectively trying to do 2 things at once. In these circumstances the amount of detailed information to support the 'development management' policies had overwhelmed the basic messages from which the strategy is derived. In the Inspector's opinion the structure of the document needed radical alteration. Much of the descriptive material could be deleted (it could be included in an accompanying document) and a much clearer focus should be placed on the matters which determine the strategy – the Main Issues, Key Challenges, Vision including what role it sees for the Borough over the next 15 years, Key Objectives. The Council needs to develop a much more clearly defined view of what these are before it can develop the most appropriate strategy for the Borough and bring forward the policies to deliver it.

### **QUESTIONS.**

The Council provided a list of Key Issues which the Frontloading Visit sought to address. The outcomes of the meeting in this regard are set out below. In addition the Inspector went through the submitted document to identify likely areas with which an Examining Inspector may have difficulties. These points are set out in **Plan Provisions** below.

### **Maps and relationship to Unitary Development Plan**

The Local Development Framework (LDF) will eventually replace the Council's Unitary Development Plan and the Council should move forward with that objective clearly in mind. The LDF is being prepared on a much more objective basis and the Examination process is not limited to simply addressing objections. Long-term reliance on the saved Unitary Development Plan, which was not necessarily prepared on the same objective basis, is not to be encouraged as it will have less credibility.

Some Council's have chosen to simply replace their Unitary Development Plan by their LDF in one move whilst others have taken a more incremental approach with the saved elements of the Unitary Development Plan being replaced bit-by-bit as DPDs emerge. Where an incremental approach is taken the DPD should clearly set out which parts of the Unitary Development Plan are replaced. It is important in these circumstances that the Council's LDS contains the documents which will provide for all of the elements which the Council seeks to bring forward from the Unitary Development Plan. A DPD should not therefore rely on Unitary Development Plan policies which should properly be contained in that DPD. Any provisions which are brought forward will need to be supported by evidence to demonstrate that they are part of the most appropriate alternative. Any allocations brought forward from the Unitary Development Plan into an Allocations DPD which have not been converted to commitments would be subject to the same requirement and will need to be examined through the new SA process.

There is no necessity for a CS to show allocated sites unless they are truly 'strategic' i.e. the strategy would fail if a particular site is not delivered. Where strategic allocations are made they should be supported by sufficiently detailed plans and background information to enable representors to fully address the relevant issues as this will be the only opportunity for the proposal to be independently Examined. In many cases a more indicative representation of broad development opportunity areas can be just as effective and can avoid expending resources on detailed preparation work in a situation where the essential strategy may be found to be unsound. It also avoids the Examination of the basic strategy being diverted into arguments about the details of a specific site.

In circumstances where Unitary Development Plan provisions have been overtaken by the DPD provisions, the Council may want to partially amend the Proposals Map (PM) of the Unitary Development Plan in the interests of clarity and to avoid confusion. However, the Unitary Development Plan PM is NOT part of the DPD. The Examining Inspector cannot direct changes to the PM. It would be for the Council to put forward these consequential changes at the Examination. Where it makes new

allocations or it introduces significant changes to designated areas in the UDP, the DPD should contain plans to show these as they are a DPD provision. (NB PPS12 requires a PM to be prepared where a strategic allocation is being made.) However, where the change simply involves a deletion from the Unitary Development Plan PM, no plans need to be included in the DPD. To use examples from the Council's DPD, it is not intended to prepare a Town Centre DPD but there is the intention to amend the Town Centre boundary. The DPD should therefore contain a reference to the change together with a plan showing the new boundary and any other changes e.g primary shopping frontages, which may have a bearing on the implementation of any town centre policy or national guidance. Changes to the boundaries of district or local centres could be either described (in an appendix) or shown on a plan. In addition the Council may decide to make clarifying changes to the Unitary Development Plan PM in order to avoid confusion. However, where the DPD contains a policy which simply deletes small designated areas of protected open space there is no need to submit a plan as part of the DPD but a single plan showing the various alterations could be attached to the PM.

The issues identified on the Mineral Resource Map are not being changed by this DPD and the map should therefore be retained as part of the saved Unitary Development Plan until replaced.

### **Evidence base**

Advice is available from PAS, the article by David Vickery in PINS Newsletter Issue 13 and the up-dated PINS Lessons Learnt document.

There are no hard and fast rules on what the evidence base should contain except that there is a requirement in national guidance to provide certain information. The extent of the evidence should be driven by the issues which are important in the district.

The Examining Inspector will need to be assured that the DPD provisions provide the most appropriate strategy when considered against the alternatives. It is important, therefore, that the evidence base should provide an 'audit trail' through the whole process i.e. the Council should be able to show what evidence led it to i) its identification of issues, ii) its identification of potential options, iii) its choice of preferred option, etc. This requires an on-going process. At every decision point the Council should ask itself – 'what evidence do I need BEFORE making that decision?' If there is a gap in the evidence – it should be filled! It is vital to be honest and self-critical through the process. The process should not involve making a decision and then trying to put together evidence to support it. The intention is that the process should be **objective** and that decisions should be **based on facts**. Even where decisions require a degree of subjectivity, the decision process should be explained and a cogent and reasoned explanation should be given for why more weight was given to one thing rather than another. Choices should be based on evidence not assertion.

It will be easier to assemble this type of evidence as the process goes along when the Council will have more time rather than during the Examination process. If the Inspector asks 'Where has this decision come from?' the Council may have difficulty putting together a cogent answer if the process happened some time ago.

The Inspector will be aware of the matters which Representations raise and the Council's identification of the main issues. However, unlike the old development plan system he will not be considering only objections raised. It is entirely possible that he may identify other areas of concern which will need to be explored through the Examination process.

The evidence base needs only to go so far as is essential to demonstrate the point – it should be proportionate. If something is absolutely self-evident, the Council should not waste time and money trying to prove it. If no-one can possibly argue otherwise, time should be spent more productively elsewhere.

Evidence should also show that proper participation has taken place. The Council will need to demonstrate that reasonable Options put forward by 3<sup>rd</sup> parties have been considered. It will also need to show that major players have had proper input and that changes have been made to reflect their proper concerns. This will be especially important in demonstrating that DPD provisions will be **delivered**.

The evidence base needs, so far as is possible, to be up-to-date – if there have been significant changes since the evidence base was produced, an up-date of the evidence may be necessary to determine if its conclusions remain valid.

It may be useful to put 'signposts' in the text of the DPD to identify which part of the evidence base was relevant to particular provisions.

It is essential that the DPD should be in general accordance with the RSS and there is a requirement that this should be confirmed by the regional body. Any divergence from the RSS will need to be robustly justified by the evidence base and the regional body should be supportive of the Council's approach.

In terms of traffic modelling, the Council stated that a joint traffic model had been prepared but that the Highways Agency (HA) was likely to raise objections to some proposals on capacity grounds. The HA would need to provide evidence to the Examining Inspector to counter that of the local planning authority and to support its case.

The Council was in the process of preparing an affordable housing economic viability assessment which would allow for the inclusion of a policy in the DPD based on 'development value' which would take account by large differences in site values/house prices across the Borough. The GO, supported by the Inspector, advised the Council to involve the house building industry in this process to improve its robustness (NB affordable housing is often a contentious issue at Examinations and it is important

that the operation of any policy put forward is clear and that the methodology can be fully defended).

With regard to any strategic sites which are allocated in the DPD the evidence base will need to address all material details of provision of the site, processes for delivery, etc.

In circumstances where the Council is expecting the delivery of additional information after the DPD Examination, such as with regard to surface water run-off rates, it should frame policies so that they are capable of accommodating existing evidence and future evidence and reference should be made to this in the text.

With regard to open space provision and other matters it would be appropriate for the DPD to say that provision will be required in accordance with the existing Supplementary Planning Document until such time as this is reviewed or a CIL regime is put in place.

### **DPD content (see also General Points above and Plan Provisions below)**

DPD policies which repeat national guidance are to be avoided particularly those which contain additional or amended provisions. It is likely that an Examining Inspector will seek to explore why policies dealing with such matters as Green Belt and Conservation Areas/Listed Buildings have been included and why their provisions go beyond or are different to national guidance. He will expect to be provided with clear evidence to support the inclusion of such policies and any variations from national guidance. Unless he/she is persuaded by specific evidence and reasoning, the Examining Inspector is unlikely to retain such policies.

The Examining Inspector will go as far as he/she can to remedy any defects in the DPD in order to secure a finding of soundness. However, his/her freedom of action is limited and is unlikely to extend to putting forward an entirely different strategy. If the DPD is found to be unsound the Inspector's Report will indicate the areas where the DPD is deficient and the Council should use this to re-assess its proposals.

### **Supporting Assessments**

There is nothing to prevent the Council undertaking its own SA but the Inspector stressed that in doing so the Council would need to be entirely honest with itself. Councils are unlikely to have the necessary expertise to undertake its own HRA but, in this area, the Council was relying on specialist expertise from outside the Council.

### **Infrastructure Delivery and Implementation**

The Inspector advised that the Examining Inspector would need to be satisfied that any infrastructure which is essential to the delivery of the DPD provisions is likely to come forward in a dependable programme. The Inspector advised that some Councils were having difficulty extracting information from infrastructure suppliers. He advised that where a strategic site or a substantial element of development was dependant on new infrastructure, reasonable evidence should be provided to show that

the infrastructure will be provided on programme. Where this infrastructure is being provided by the developer the Council should present evidence that viability has been assessed.

In the first 5 years of the plan period the Examining Inspector will expect to see reasonable evidence to show that infrastructure will be available. But, even so, some assumptions will need to be made and the Monitoring of the DPD should contain contingencies if these assumptions prove to be unfounded. In circumstances where the Council can show that the infrastructure provider has been fully consulted throughout the process but has made no representation, that may go some way to support an assumption that infrastructure will be provided.

In the second and third 5 year periods it is accepted that the level of detail and accuracy will be less but, again, the Monitoring exercise should contain measures to identify any divergence from assumed timetables and should contain appropriate contingencies.

The Inspector advised that Monitoring, Flexibility and Implementation was an important element of the DPD. The monitoring could rely heavily on information collected through the AMR. However, in the Inspector's view it would be necessary for the DPD to identify Targets (possibly time based) and Trajectories, Levels of Deviation and Indicators which would trigger reviews, and Remedial Actions and Contingencies (also time-identified) which would be brought in to bring the DPD back into line. The Inspector advised that this could be set out in an appendix to the DPD in the form of a table.

### **Procedural Matters**

The Inspector advised that if the LDS timetable had slipped by a month or 2 this would have little bearing on the Examination. The timetable should not be too out-of-date however as it is useful for the Examining Inspector to know when lower-order DPDs can be expected.

The Inspector was of the view that the Programme Officer (PO) should be in place when the DPD is published although at first it may only require 2 or 3 days per week with workloads 'ramping up' once the Inspector is appointed. The Inspector's experience was that PO workloads were less than had been experienced under the Unitary Development Plan system because there were less duly-made representations.

The Inspector was aware that a number of Councils were employing the Limehouse Consultation Portal. He was not aware of any problems although he had heard some comments from POs that it was inflexible. The Inspector advised that, if the Council was seeking to employ an experienced PO, it should consult with him/her before choosing.

Formal inquiry sessions in Examinations are now very rare. Legal representation at the Hearing sessions is unnecessary, although in the Inspector's own experience advocates can play a useful role in summarising cases and evidence and contributing towards suggested amended wording of DPD provisions. However, cross-examination is not

permitted. The Examining Inspector will direct proceedings and will ask most of the questions. The Council was advised that its officers could attend other Examination sessions or S78 Hearings to get a feeling for the process.

The Inspector understood that payments to PINS were due to be paid after receipt of the Final Report. Other queries on these matters should be addressed Steve Carnaby.

### **Climate change policies**

National guidance requires the Council to have an evidence based understanding of the local feasibility and potential for renewable and low carbon technologies to supply new development in area. Preparation of this should involve providers and it should be part of evidence base. This should be employed to locate development where opportunities are greatest.

From this information (and ensuring consistency with housing and economic objectives) the Council may set targets % of energy used in new development to come from decentralised and renewable and low carbon technologies where it is viable. Where there are particular and demonstrable opportunities for greater use of decentralised and renewable and low carbon technologies than the target, the Council should bring forward development area or site specific targets.

In terms of local requirement for sustainable buildings, any planning policies should support innovation and investment in sustainable buildings and should not deter novel solutions. The requirements of Code for Sustainable Homes although only voluntary at present will become mandatory through the Building Regulations. If the Council does not intend to act ahead of the mandatory programme then it could be argued that no specific policy requirement in the DPD is necessary. If the local planning authority wants to act ahead of national agenda it needs to 'clearly demonstrate the local circumstances which warrant and allow this'. These may include clear opportunities for significant use of decentralised and renewable and low carbon technologies or circumstances which would render the development unacceptable unless the higher standard was imposed. These local targets should be site or area specific but should not prescribe particular materials unless absolutely necessary, for instance, for design reasons.

### **PLAN PROVISIONS**

The points made below represent the more detailed matters which the Inspector noted on reading the document. In the time available it could not be expected to provide a comprehensive list but the general principles involved could be applied in other places.

Please see the points made in General Points above regarding length, repetition, clarity, focus, etc

Many of the individual policies are muddled through the introduction of 'development management' provisions. This has obscured any clear

appreciation of any strategy for the Borough. In the Inspector's view it is essential that the Council draws out a clear and focussed strategy for the district.

Policy 1 – this should be the place where the essential locational and spatial principles should be set out in order to inform those policies which follow. However, the messages are lost in the detail and background information.

Paragraphs 4.10-23 – This should be placed before Policy 1 to make any sense. Again it is unclear how the chosen strategy developed and how the decision making process led the Council to its chosen strategy. What the chosen strategy IS is also unclear.

Key Map – could go further including detail of where and how much housing development is proposed.

Policy 2 – given that health and education are major issues it is proper that the DPD should seek to deal with them. However, the policy gives no indication of what the Council's support would amount to or what would be appropriate circumstances. Should the policy be more forceful requiring developer requirements or sites to provide facilities? As it stands the policy says nothing 'concrete'?

Part e. seems out of place in this policy. It is a 'locational requirement' policy which would be more appropriate in Policy 1 or more likely Policy 14. Certainly locational requirements for housing should be brought together in one place and not spread through the DPD. Whilst the principle which it sets out is reasonable, be careful that it is not too stringent. Careful thought is required regarding its application and the way in which it would interact with other policies. Is this provision intended to supplement or to over-ride Policy 14 for instance? What if a proposal complied with one policy but not the other?

Policies 3 and 4 – these are clearly development management policies and should be separated from the strategic policies. It is not uncommon for CSs to contain a policy which encourages good design and environmental quality and which provides a basis for covering such matters in future DPDs. These policies could be shortened.

Policy 5 – this is another 'locational requirement' policy and is useful in that it would deliver a 'hierarchy' of sites which would enable the Council to manage delivery by releasing or holding back sites of certain qualities. However, how does it mesh with part e. of Policy 2? Is it too restrictive in that it would hold back some sites which may deliver clear environmental or community benefits?

c. and d. – could the strategy go further than encouraging use of Metrolink and cycling by giving priority to Metrolink and cycle route accessible sites?

Policy 7 – the Inspector understands that a joint approach is being taken by a group of Council's with the intention of producing a common policy.

Policy 11 – see first paragraph under DPD Content above. Is this meant to replicate PPG2 (in which case it is superfluous) or is it intended to take Green Belt policy further (in which case, has the Council the evidence to support that position?)? It would be sufficient to say in text that Green Belt issues will be dealt with in accordance with national guidance.

Open Protected Land/Land Reserved for Future Development – there is no clear indication of what these designations are designed to achieve or any evidence to show that the designations are necessary. They appear to have been carried forward from the Unitary Development Plan but, under the LDF regime, they now need to be objectively justified.

Policy 13 – see comments on Policy 11. On the face of it the policy seems superfluous and should be deleted.

Policy 14 – the policy is confused in what it is trying to achieve. From the discussion at the meeting it is clear that the Council is not intending that a., b. and c. should be a hierarchy of sites with some chosen for development before others. Instead it is intended that all 3 locations would be equally acceptable for development provided that it contributed to addressing the varied problems of housing mix in the different areas. This appears to be a major issue for the Council but it is not made clear. The Council should carefully think about this policy, explain what it is intended to do and re-word it to achieve the stated objectives. The policy and its text should also make clear why this strategy has been adopted as the best alternative ahead of other strategies which could be argued to be more sustainable. The policy contains no provisions to govern mix. Surely if its main purpose is to redress the balance in the housing mix, it should contain some requirements in this regard even if it is specified that the mix requirements will only be applied until such time as monitoring indicates that the balance is re-established?

Is Policy 14 supported by the SHLAA? The policy gives no indication of whether this distribution of housing is feasible or what types of site would be involved in the various locations in meeting the targets. How can one know whether the distribution is realistic or viable?

Policy 15 – this deals with effectively non-allocated or ahead-of-programme housing sites. How do its requirements mesh with locational policies elsewhere in the DPD (Policies 2 and 5).

It could be argued that the requirements in regard of previously-developed land should also be applied elsewhere (policy 14 for instance).

Policy 16 – details of the affordable housing strategy are being worked up – see Evidence Base above. The Council will need to consider how that policy will be applied to ensure that housing mix issues in the various locations are addressed.

Policy 17 – the policy could go further in developing a strategy to address what is a main issue. See Policies 14 and 16

NB the Inspector suggests that the 'housing' policies and 'locational requirement' provisions need to be thought through as a package to produce a robust and coherent strategy.

Policy 18 – the criteria should reflect those set out in the Circular and either the policy or text should state that the Council intends to make allocations in the Allocations DPD.

Policies 19-22 – the policy is unclear. It does not make clear where the 80ha of land will be found. The role of BEAs and SEAs is unclear – if they are to be identified in the DPD then they should be indicated on a DPD plan in order that there will be no outstanding overlap with the Unitary Development Plan when it is superseded (alternatively they could be identified in the Allocations DPD and a line in the text could say that Unitary Development Plan designations in this regard would be relied upon until that time).

Policy 19d. should be worded so as not to act as a barrier.

The treatment of in the DPD of Foxdenton will depend on whether or not it is treated as a strategic site. However, the policy should not be so long as its content is essentially background. The relationship of the various types of site should be clarified and simplified. How will this strategy deliver the improvements in economic opportunities which the Council sees as a main issue? Would it not simply replicate what has happened in the past? The range of potential uses is very wide and there would be nothing to prevent wholly 'non-industrial' use of some sites.

The text of the Robert Fletcher/Green Belt site entry should make clear that the site's future will be addressed at the Allocations DPD stage and that until that time it will be dealt with as per Unitary Development Plan policy.

Could Policy 22 be firmer in stating what WILL be provided? The policy could then be properly delivered and monitored.

Policy 23 – much of this policy is unnecessarily detailed and could be adequately shown on a plan. The alterations seem very minor.

The essential policy does little more than repeat PPS6. In that respect it could therefore be superfluous. The policy could be reduced to essentially 'The Council has re-assessed the boundaries of these centres and the extent of primary/secondary shopping frontages. These are shown on the attached Plan. Proposals for Town Centre uses will be determined in accordance with PPS6.' followed by a section on the night-time economy. However, as has been correctly pointed out by GONW, the latest advice in the recently published PPS4 now supersedes PPS6 and needs to be taken into account. The Council would need to satisfy itself that any policy or provision dealing with centres has been prepared in a way which is consistent with that latest guidance. Again, if the thrust of any policy simply replicates the policies contained in PPS4, there would be no need to repeat them but it would suffice to make a reference which commits the Council to making planning decisions in accordance with the guidance.

Policy 24 c. – these criteria could place obstacles in front of some development proposals which the Council could be happy with.

## **Addendum to Note of PINS Frontloading Visit**

*The Way Forward: Core Strategy Policies*

*Pages 1-4 Of the Refining Options document*

The information in Table 2 goes some considerable way to describing the key elements of the Council's strategy and is a key addition to the information in the main part of the Refining Options document. However, the process by which this strategy has been evolved remains unclear and a number of questions remain unanswered.

For instance:

What are the Main Issues facing the district which this chosen strategy is seeking to resolve?

What is the Council's Vision for the district? In what direction is it intended to take the district and how would the chosen strategy achieve that? In the Inspector's view that needs to be clearly understood before any coherent strategy could be evolved.

What led the Council to consider the 3 options in Table 1? What was the process which led to their choice? How was each one intended to address the Main Issues and deliver the Vision?

What process led to the adoption of the various elements of the Table 2 strategy?

This could be most appropriately contained be in a Background Paper. The column 2 information is useful but should be more clearly cross-referenced to the relevant part of the data base and, possibly, to an explanatory Background Paper.

The DPD should demonstrate that the most appropriate alternative to deliver the Vision and to address the Main Issues has been adopted. The alternative set out in Table 2 may well be the most appropriate alternative for this district but should be supported by the additional background to decision making.

The Council should ensure that the thrust of the policies in the DPD are clearly directed towards the delivery of the strategy.

## Change in Policy Numbers

<b>Policy No.</b>	<b>Pre PINS Visit</b>	<b>Post PINS Visit</b>
1	Spatial and General Principals	Climate Change and Sustainable Development
2	Communities	Communities
3	Local Environmental Quality and Amenity	An Address of Choice
4	Design	Promoting Sustainable Regeneration and Prosperity
5	Promoting Accessibility and Sustainable Transport Choices	Promoting Accessibility and Sustainable Transport Choices
6	Gateways and Corridors	Green Infrastructure
7	Energy	Sustainable Use of Resources – Waste Management
8	Water and Flooding	Sustainable Use of Resources - Minerals
9	Green Infrastructure	Local Environment
10	Protecting Natural Environmental Assets	Affordable Housing
11	Protecting Open Land	Housing Density and Mix
12	Open Spaces and Sports	Gypsies, Travellers and Travelling Showpeople
13	Historic Environment	Employment Areas
14	Housing	Supporting Oldham's Economy
15	Managing the Release of Housing Land	Centres
16	Affordable Housing	Local Services and Facilities
17	Housing Density and Mix	Gateways and Corridors
18	Gypsies, Travellers and Travelling Showpeople	Energy
19	Promoting Economic Regeneration, Diversification, Growth and Prosperity	Water and Flooding
20	Employment Areas	Design
21	Key Development Locations	Protecting Natural Environmental Assets
22	Supporting Oldham's Economy	Protecting Open Land
23	Centres, Retail, Leisure and Office Uses	Open Spaces and Sports
24	Local Services and Facilities	Historic Environment
25	Waste Management	Developer Contributions
26	Minerals	
27	Infrastructure and Developer Contributions	