

Oldham

Local

Development

Framework

**'Refining Options'
Public Schedule of
comments and responses**

Part of Core Strategy and Development Management Policies
Development Plan Document

September 2010



Oldham
Council

INTRODUCTION

- 1.1 During May / June 2010 we consulted on the Refining Options stage of the joint DPD. The Refining Options stage summarised the main issues and key challenges facing the borough and revised the vision to make it more descriptive of the different places within the borough. The report sets out the final suite of policies including the supporting text. The policies in the `Refining Options` have been separated into two parts: part one forms the Core Strategy which sets out the way forward for the LDF, and part two contains the development management policies on how the key elements of the LDF will be implemented. We also set out details of how the LDF will be delivered and monitored. The report was effectively the final plan to be published and submitted to the Planning Inspectorate for examination
- 1.2 This report summarises the comments we received, our responses to the points raised and details the changes made to the Refining Options documents to produce the publication document.
- 1.3 Over 80 people and organisations submitted responses on the joint DPD documents. Among the government and statutory agencies that responded were Government Office for the North West, 4NW, the Northwest Regional Development Agency (NWDA), English Heritage, the Environment Agency, Sport England, the Coal Authority, Natural England, the Highways Agency, Greater Manchester Passenger Transport Executive (GMPTE), Oldham Town Centre Partnership, British Waterways, Oldham Rochdale Housing Market Renewal Pathfinder (HMR) and the National Trust. Chorlton Planning submitted comments on behalf of a number of clients (see Table 2 for details).
- 1.4 The key issues that arose were:
 - Offices – to be more explicit about how much new office floorspace will be required over the LDF period and where it will go. (GONW, 4NW).
 - Retail - to be more explicit about how much new retail floorspace will be required over the LDF period and where it will be go. (GONW)
 - Foxdenton – the need to strengthen the case for delivery of the site and its timescales, and about the transport accessibility of the site. (NWDA, 4NW, Highways Agency, GMPTE and Environment Agency)
 - Affordable homes – the need to be more explicit about how many affordable homes we will provide over the plan period, rather than just setting out details of the mechanisms for how we will secure and deliver them. (GONW)
 - Parking standards – the joint DPD itself needs to set out what our approach to parking standards will be now that RSS has been abolished. (GONW)

- Habitats Regulations Assessment (HRA) – The HRA has been prepared to see the effects the joint DPD may have on our highest designation nature conservation sites, the Rochdale Canal and the South Pennine Moors. The HRA has been prepared on our behalf by the Greater Manchester Ecology Unit, working closely with Natural England. However, Natural England expressed some views about how the HRA and how the plan-making stage links to the planning application stage.

1.5 Table 1 is a summary of the comments received during the Refining Options consultation and the council's response to those comments, which indicate, if appropriate, how the council will make use of the comments in taking forward the next stage of the joint DPD. (Please see the publication document for the definitive response.)

Table 1 Summary of main comments received at `Refining Options` consultation stage

Comment from	Refining Options section / policy	Comment	Council Response
GONW	General	References to RSS should be edited out. Policies and other provisions implementing or dictated by RSS can be retained but should be justified by reference either to the evidence base or to national policy. The evidence which was produced to support RSS will, however, continue to be a material consideration and can be used to justify policy.	Comment noted. References to RSS have been edited.
GONW	Spatial Portrait	Suggests moving the Spatial Portrait back into the main body of the DPD now Refining Options consultation is over.	Spatial Portrait was included in the Appendices of the Refining Options to make for a more focused consultation, on the advice of the Advisory Planning Inspector. The Spatial Portrait has been moved to the main document.
GONW	Key Diagram	Key Diagram currently mentions adjoining towns but is not as explicit as it could be about influences outside the borough. In particular it would make sense to show the strategic regional sites which lie outside the borough.	Our neighbouring districts' key sites have been added to the Key Diagram.
GONW	Introduction	Delete paragraph 2.6	Paragraphs 2.6 – 2.10 have been deleted as they were specific to the Refining Options consultation.
GONW	Address of Choice	With regard to Policy 3, you should be able to demonstrate that the proposed distribution of new housing development between district partnership areas is	Comment noted. The distribution of housing was included on the advice

Comment from	Refining Options section / policy	Comment	Council Response
		considered to be achievable. Reference to evidential justification in the submitted text would be helpful to the Inspector.	of the Advisory Planning Inspector. The distribution is based upon the findings of the SHLAA. Paragraph 5.37 states that we have sufficient land supply to meet our housing requirements over the life of the LDF. Additional footnote references added to the joint DPD. See publication document.
GONW	Promoting Accessibility and Sustainable Transport Choices	Now RSS is to be abolished, the council will need to decide which parking standards will be used in the LDF.	In line with PPS4, the council will adopt the standards set out in PPG13 until it can prepare locally-specific standards.
GONW	Housing	Policy 10 includes a target for affordable housing provision expressed as a percentage of total sales value. PPS3 (paragraph 29) advises that local development documents should include a plan-wide target for the amount of affordable housing to be provided. It is unclear what overall amount of affordable housing you are seeking to provide. We therefore suggest that you attempt to quantify the approximate number of affordable homes you expect to be realised as a result of the policy.	The policy sets out the mechanism for securing affordable homes. The council will set out details about the number of affordable units in the Site Allocations DPD. Additional text added to the joint DPD to explain our approach. See publication document.
GONW	Saved policies	As we would not expect UDP policies to continue in perpetuity, you need to be clear how all of the policies will be replaced or deleted.	Table updated for greater clarity on when saved UDP policies will be replaced, where appropriate.
GONW	Employment	GONW wants the DPD to be more explicit about how much new office floorspace will be required over the LDF period and where it will go.	Our approach is consistent with national policy and is justified. Additional text added to the joint DPD to further explain our approach. See publication

Comment from	Refining Options section / policy	Comment	Council Response
			document.
GONW	Centres	GONW wants the DPD to be more explicit about how much new retail floorspace will be required over the LDF period and where it will be go.	Additional text added to the joint DPD to explain our approach. See publication document.
4NW	General	It will be important to ensure that the wording of the DPD does not rely on references to RSS policy, but uses other guidance and evidence base to support the policy approach.	References to RSS and 4NW have been edited.
4NW	Settlement pattern	The proposed distribution of development is generally in line with RSS. However consideration should be given to more clearly indicating the settlement hierarchy and general levels of development to be directed to each settlement, so that the DPD will remain clear in the longer term once RSS is no longer in place. We note that this has already been done in terms of housing development in Policy 3	Comment noted. Policy 1, criteria b, sets out the <u>approach to housing development</u> , which is further expanded upon in Policy 3. Policy 1, criteria c, sets out the <u>approach to retail development</u> , which is further expanded upon in Policy 15. Policy 1, criteria d, sets out the <u>approach to business and industry</u> , which is further expanded upon in Policy 4 and Policy 14.
4NW	Green Infrastructure	We welcome the approach to Green Infrastructure set out in Policy 6. However, it may also be useful to highlight the contributions GI can make to adapting to and mitigating to climate change, to providing health benefits and also to boosting the economy. These concepts could be introduced in policy 1 and/or policy 6. Policy EM3 of the RSS provides further guidance approaches to GI.	Comment noted. Policy 1 sets the overall context for the joint DPD, including climate change and Green Infrastructure. Paragraph 5.63 of the joint DPD (Refining Options) highlights the environmental, social and economic benefits of Green Infrastructure, including the health benefits and climate change. Additional text added to the joint DPD to further explain the benefits. See publication document.

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4NW	Strategic Objective 2	Objective SO2 (d) which relates to making best use of existing stock needs to be supported by the policies. We would recommend that this aspect is further developed in Policy 1.	Comment noted. Policy 1, criteria a, refers to the effective and efficient use of land and buildings. It refers to the "reuse and conversion of existing buildings".
4NW	Affordable Housing	Policy 10 refers to the need for further advice and guidance on affordable housing - it will be important to provide this.	Comment noted.
4NW	Employment	It will be important to demonstrate that the Foxdenton broad location is deliverable over the plan period	Foxdenton is deliverable over the plan period. The landowners have expressed support for development of the site. Policy 14 on Foxdenton has been amended to incorporate text from the Refining Options Appendix 5 into the main supporting text. This provides more information on deliverability. See publication document.
British Waterways	Vision	Welcomes the recognition of the canal in the Vision both in terms of its nature conservation status and as a 'key asset in terms of recreation, image and quality of life'. We support the reference to the Huddersfield Narrow Canal and its role as a tourist attraction.	Support noted.
British Waterways	Key Diagram	Pleased that the Rochdale Canal is highlighted on the key diagram and legend.	Support noted.
British Waterways	Green Infrastructure	Supports the reference to the Rochdale and Huddersfield Narrow Canal as two of the features of the borough's green infrastructure. It is also welcomed that the Green Infrastructure is described as multi-functional. The canal forms part of the local and strategic green infrastructure network and is unique in respect of its own multi-functional nature	Support noted.
British Waterways	Water and Flooding	Supports the intention to use opportunities from waterside developments to rehabilitate canal and river corridors. We would suggest that in order to further clarify this section it should be specified that commuted sums will be sought via	Support noted.

Comment from	Refining Options section / policy	Comment	Council Response
		S106 Agreements.	
British Waterways	Protecting Natural Environmental Assets	Part e - fully supports the reference to protection and enhancement of the canal, while at the same time recognising the need to ensure that development does not affect other operations in connection with navigation, maintenance or access.	Support noted.
CABE	General	A general letter submitted, but nothing specific about the LDF.	Comment noted.
Environment Agency	Climate Change and Sustainable Development	We would seek a much stronger stance than just “respects” – suggests “essential”.	Comment noted. The word “respects” was used in the context of its dictionary definition meaning as to “pay proper attention to”. Therefore it is considered appropriate to continue with “respects” in the policy.
Environment Agency	Green Infrastructure	Include reference in the list of documents to the now approved North West River Basin Management Plan.	Reference added. See publication document.
Environment Agency	Green Infrastructure	We would support any proposals that positively improves and invests in existing Green Infrastructure and ecological networks that requires investment to improve its current ecological status.	Comment noted.
Environment Agency	Green Infrastructure	We would seek as part of the LDF that developer contributions as highlighted in policy 25 could be allocated to enhance and manage the key Green Infrastructure elements, in particular the river valley corridors which have been degraded by past poor development as this could have major beneficial effects to the current quality of Green Infrastructure in the borough.	Comment noted. Policy 25 supporting text amended. See publication document.
Environment Agency	Housing	It is recommended in the supporting text that further guidance on the location and characteristics of a potential residential site is provided ensuring guidance within current PPS1 & 3, the new ‘ <i>Landscape Character Framework</i> ’ and key landscape and green infrastructure elements such as river valleys are protected and integrated into future development proposals.	Comment noted. Policy 11 already refers to “landscape” as a relevant criterion. The matter will be picked upon through the further advice and guidance that will be prepared once the joint DPD is adopted.
Environment Agency	Employment Areas	Foxdenton has a number of tributaries traversing the area. EA would seek such stream corridors are actively integrated within any regeneration proposals, with	Comment noted. Policy 14 on Foxdenton has been amended to

Comment from	Refining Options section / policy	Comment	Council Response
		green infrastructure and protecting natural assets policies placed at the heart of any development, ensuring there is no derogation or impact on the ecological value of the locality, and preferable enhancement.	incorporate text from the Refining Option Appendix 5 into the main supporting text. This flags up that a site-specific floodrisk assessment will be undertaken to highlight and address issues relating water and flooding. See publication document.
Environment Agency	Employment Areas	Add indicators 27 and 39 to the monitoring list.	Indicators not considered appropriate for the Foxdenton site.
Environment Agency	Employment Areas	Paragraph 6.42 – Environment Agency proposes the following wording: ‘...in areas at risk of flooding. Proposals in these areas will need to be accompanied by a site-specific flood risk assessment.’	Comment noted. See publication document.
Environment Agency	Gateways and Corridors	EA would seek as part of any future transport proposals that existing river corridors and key green infrastructure assets that lie alongside such development proposals are actively protected and enhanced as part of any future scheme design, and that future development complies with RBMP objectives in ensuring there is no deterioration in any waterbodies status, and preferable enhancement of such heavily modified catchments that lie alongside such transport infrastructure.	Comment noted.
Environment Agency	Gateways and Corridors	Add indicator 28 to the monitoring list.	Indicator added. See publication document.
Environment Agency	Energy	EA suggests adding reference to potential hydropower schemes.	Comment noted. Reference added. See publication document.
Environment Agency	Energy	Any scheme should make sure there is adequate environmental assessment as part of the application to ensure the most environmentally sensitive option is pursued without degrading existing biodiversity or amenity assets, or are in contradiction with River Basin Management Plan objectives.	Paragraph 6.83 (of Refining Options) stated that all relevant considerations will need to be fully assessed before permission would be granted.
Environment Agency	Water and Flooding	EA welcome this policy and consider that overall it covers flood risk adequately in line with the SFRA recommendations. However, it is not always necessary for	Support noted. Policy criterion amended by adding “where

Comment from	Refining Options section / policy	Comment	Council Response
		a Site Specific Flood Risk Assessment to be produced for development proposals within 20m of the bank top of a Main River.	appropriate" to text. See publication document.
Environment Agency	Water and Flooding	EA especially support sections c, d & e, whose overall emphasis is to protect and in particular enhance the borough's aquatic resources that have been degraded in the past by poor riparian development, and meet new RBMP objectives through future development	Support noted.
Environment Agency	Water and Flooding	Whilst EA are in support of the adoption of SUDs as part of overall drainage strategy for a site, it is recommended that there is a preference, where feasible, to include above ground SUDS options, in the form of ponds, swales, green roofs etc. rather than the orthodox underground storage systems that offer far less all round benefits such as biodiversity and landscape value.	Comment noted. See publication document.
Environment Agency	Protecting Natural Assets	The current policy is still largely orientated around protected areas, and certain specific habitat types, and lacks any focus on the aquatic environment, apart from canals, to which are linked significant ecological and Green Infrastructure assets.	Comment noted. See publication document.
Environment Agency	Protecting Natural Assets	Para 6.104 - It is sought that ecological assessment should be included for all sites identified along key green infrastructure assets or wildlife corridors, and not just designated or sites with substantial nature conservation value, to ensure such future development maximises opportunities to not only protect existing ecological value, but also identify and enhance the biodiversity of a site, as sought through current planning policy PPS9.	Comment noted. See publication document.
Environment Agency	Protecting Natural Assets	EA suggest a new indicator be created to closer integrate with the new RBMP by ensuring that all waterbodies show no deterioration over the plan period and all waterbodies within the borough achieve objectives set out in the NW RBMP.	Reference to the RBMP added to the joint DPD, but no new indicator added. See publication document.
Environment Agency	Developer contributions	More background information about CIL is requested. In addition, the supporting text should expand on how such developer contributions will be related to the nature and scale of the proposed development and also its impact upon the surrounding environment. It is also beneficial that the policy identifies more clearly where such contributions may be required such as green infrastructure, biodiversity enhancements/mitigation, public realm and environmental improvements, and improved surface water drainage using SUDs.	Comment noted. See publication document.

Comment from	Refining Options section / policy	Comment	Council Response
Saddleworth Civic Trust	General	<p>The Issues are:</p> <ul style="list-style-type: none"> • Maintaining the Green Belt and corridors with no further encroachment into these areas. • Over development and urbanisation of a rural and semi rural area. • Maintenance of the individual character of the villages. Infill development between villages leads to a lack of definition. Concern has been expressed that Uppermill will be designated a District Centre and will therefore have greater density of population. • Despoliation of the environment by the location as well as the density, type and style of housing. The use of unsuitable forms of construction for other infrastructure such as walling and the urbanising of country lanes. • Highways and traffic flow of commuters from new developments to places of work has not been considered adequately. This strain on the infrastructure increases pressure to add increasing amounts of road signs, markings and pressure on parking. • In particular, parking at schools is not addressed adequately as there is no attempt to control this traffic. • The density of housing is putting pressure on supporting utility services. 	Comment noted. The joint DPD addresses these issues.
HMR	General	<p>We support the key role of the housing market renewal initiative in making the borough an address of choice. We support the re-cycling of employment land where this is consistent with supporting the overall economic strategy and supporting housing-led regeneration</p>	Support noted.
HMR	Vision	<ul style="list-style-type: none"> • We support the general thrust of the Vision, especially in relation to promoting sustainable development and addressing climate change issues. • HMR also supports the commitment to high quality design (item a) but we suggest that the phrasing of this paragraph is revised to read “We will require high quality design and sustainable construction of new development that <i>will improve the quality of the borough, and reflect and enhance the positive character of the local area</i>”. • HMR supports item (c) especially the need for good quality housing and choice and diversity within the housing stock – these principles are central to 	Comment noted. See publication document.

Comment from	Refining Options section / policy	Comment	Council Response
		<p>the HMR aims and objectives.</p> <ul style="list-style-type: none"> • HMR support the boroughwide vision, especially the effective and efficient use of land and buildings in sustainable and accessible locations within the urban area. • We support the release of previously developed land before the release of greenfield sites. • We also support the stated minimum “brownfield” target of 80% and the statement that HMR will be contributing to the improved housing offer. • We support a high level of housing development in East and West Oldham. This is consistent with HMR proposals in Werneth and Derker; areas in which HMR has assembled a substantial amount of land for housing development close to sustainable public transport options, particularly Metrolink which will bring these areas within easy reach of the regional centre. 	
HMR	Objectives	<p>SO1 – We support SO1, particularly the need for high quality design.</p> <p>SO2 – We support SO2, particularly the need to make Oldham an attractive housing market. However, item (c) should be clarified to include a reference to the type of affordable housing, not just the quality; Oldham is demonstrably short of affordable family housing of 4 bedrooms or more. We also support item (f) which states that approximately 60% of new housing will be built in East and West Oldham.</p> <p>SO3 – We support SO3 which promotes economic diversification and growth. However the text should also show how economic aspirations are supported by the need to provide a much improved housing offer and to regenerate currently deprived neighbourhoods.</p> <p>SO5 – we support the need to create inclusive communities. The promotion of community cohesion through improved housing choice and quality, and through good quality consultation and engagement, is a key priority for the programme</p>	<p>Support noted.</p> <p>SO2 - It is considered more appropriate to identify the types of affordable homes that will be needed in the policies rather than the objective as this may change over the life of the LDF plan period.</p> <p>SO3 – The joint DPD has to be read as a whole. The links between the housing market and the economy are reflected throughout the joint DPD.</p>

Comment from	Refining Options section / policy	Comment	Council Response
			SO5 – Support noted.
HMR	Strategy	<p>The Pathfinder supports the general thrust of the preferred way forward. We support the focus on regeneration areas and previously developed land but would like to see some clarity around the release of open land for housing development – the amount of housing development this is expected to generate and the timescales over which it is to be delivered.</p>	<p>Support noted. Policy 3 sets out details of how we deliver housing development. We will make use of the evidence from the SHLAA. The Site Allocations DPD will set out the details about timescales for individual sites.</p>
HMR	Climate Change and Sustainable Development	<p>The Pathfinder supports the general thrust of Policy 1, although we note that it appears to cover a wide range of uses in a lengthy narrative. Having said this, we support the statement that development must not prejudice the regeneration plans of an area. The Council will need to be clear how it intends to ensure the release of peripheral open land, for instance at Foxdenton, will achieve this aim.</p> <p><i>Supporting Text, page 23, para 5.11</i> - The supporting text appears to promote mixed use developments. Whilst this can be supported as a matter of principle, it is not clear how mixed use development – the type of uses foreseen and the locations where this may be appropriate – fits into the overall strategy.</p> <p><i>Supporting Text, page 23, para 5.19</i> - We suggest that the first sentence is deleted: the design principles are much wider and more comprehensive than just the consideration of character.</p>	Comments noted.
HMR	Communities	The Pathfinder supports Policy 2, particularly factors (i) through to (vi).	Support noted.
HMR	An Address of Choice	<p>Whilst HMR supports the thrust of this policy, HMR would like to see a reference to “quality” as not only would this be consistent with the Vision and Objective 1, but is a central aspect of HMR aims and objectives.</p> <p>Distribution of Housing - We support the general distribution of housing which focuses on East and West Oldham in particular.</p>	Support noted. Opening paragraph amended as suggested. Other comments noted.

Comment from	Refining Options section / policy	Comment	Council Response
		<p>Managing the release of housing land - We support the general approach to managing the release of housing land which is intended to focus on priority sites. However the approach to the premature release of allocated land and so called “windfall” sites would benefit for further refinement. Specifically, it is not clear how the Council would deal with any conflict between national and local priorities. To be effective, the policy needs to set out clearly what the regeneration priorities are.</p> <p><i>Supporting Text, page 32, para. 5.39 - We support the clear statement that managing the release of housing land is designed to ensure that the focus is on supporting the aims and objectives of HMR during the lifetime of the project using a “plan, monitor, manage approach”.</i></p>	
HMR	Promoting Accessibility and Sustainable Transport Choices	We suggest that the background to the thresholds for the production of a transport assessment and/or travel plan are confirmed in the text.	Reference to the source of the thresholds to be added to the joint DPD. See publication document.
HMR	Affordable Housing	HMR generally supports the policy on affordable housing as central to developing mixed and sustainable communities. Further information is sought on mixed developments.	Support noted. Policy 11 deals with mix and tenure of a housing development.
HMR	Housing	Whilst this policy is supported in principle, additional clarity on the local evidence to be used would be helpful.	Support noted. Additional text added to the joint DPD. See publication document.
HMR	Gateways and Corridors	This policy is supported in principle but should identify the key gateways and corridors to which it applies. To be effective, a study for each should be carried out identifying strengths, weakness and opportunities.	Support and comment noted.
HMR	Energy	We suggest that this policy needs some clarifying and streamlining as energy use is a complex subject.	Policy amended to offer greater clarity. See publication document.
HMR	Design	The Pathfinder supports this policy.	Support noted.
HMR	Historic	Whilst the Pathfinder supports this policy in principle, it should be explicitly	Policy already referred to heritage-

Comment from	Refining Options section / policy	Comment	Council Response
	Environment	recognised that in some cases there may be economic and regeneration justification for the demolition of listed structures.	led regeneration, but extra references to economic and community objectives added to the joint DPD. See publication document.
National Trust	Vision	<p>The changes made to the first sentence go part way to addressing the Trust's representations at the Preferred Options stage by taking a more integrated approach to sustainable development. However, the amended wording that the Trust previously proposed does in our view remain more apt as use of the words "safeguarding and enhancement" would acknowledge the need to make progress with the environmental objectives of sustainable development, i.e. there should be a positive encouragement for environmental objectives, in the same way as is promoted for economic objectives (where transformation is sought), rather than merely a standstill approach of "respecting" the environment. Accordingly it is still considered that the lead part of the Vision is not sufficiently ambitious in terms of its environmental aspirations.</p> <p>Bullet points h, i and j do pick up some of the appropriate detail, but replacing "respecting" in the first paragraph with "safeguarding and enhancing" is considered necessary in order to demonstrate an integrated approach that is consistent both with PPS1, and indeed with the bullet points in the Vision.</p> <p>The "sub-Visions" set out for the borough overall and for its different sub-areas are agreed and supported.</p>	Support and comments noted. The word "respects" was used in the context of its dictionary definition meaning as to "pay proper attention to". Therefore it is considered appropriate to continue with "respects" in the Vision.
National Trust	Objectives	<p>SO1 – amended wording supported.</p> <p>SO4 – generally the Trust supports the amended Objective and considers that in most respects it has addressed the deficiencies that were previously identified. The addition of the wording "and their wider settings" at the end bullet point b is particularly welcomed and entirely consistent with the recently issued PPS5. The one area that remains a concern is that there is no specific reference to a</p>	<p>SO1 - Support noted.</p> <p>SO4 – Support noted. The objective refers to both landscape and heritage in their broadest terms. The details of how the joint DPD will manage those matters are</p>

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		<p>character based approach to either landscape or heritage. It is suggested that a specific reference to this document is added to bullet point c; e.g. "...respects our rural and historic landscapes through ensuring consistency with the borough's Landscape Character Assessment SPD."</p> <p>SO5 – the changes to this Objective are supported, in particular the recognition of the importance of open spaces, and access to them, including as part of the approach to improving health, well being and quality of life.</p>	<p>picked up in the policies. Policy 21 picks up in great deal the issue of landscape character assessments, whilst Policy 24 picks up in greater detail the issue of heritage. The borough's Landscape Character Assessment document has been published as part of the LDF's evidence base, it is not an adopted SPD.</p> <p>SO5 – Support noted.</p>
National Trust	Strategy	The National Trust supports the approach as summarised in Table 2.	Support noted.
National Trust	Climate Change and Sustainable Development	<p>The policy does not make specific reference to "adapt to those impacts of climate change".</p> <p>Reference should be made to the council's Landscape Character Assessment.</p> <p>The recognition of the importance of 'settings' in bullet point I is again noted and supported.</p>	<p>The draft policy referred to "address climate change". The text of the joint DPD has been amended. See publication document.</p> <p>Landscape Character Assessment – the joint DPD has to be read as a whole. Policy 1 is the overall policy for the joint DPD, with its themes further developed through the other policies. Policy 19 deals with landscape character assessment.</p> <p>Bullet point I – Support noted.</p>

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National Trust	Communities	The text under 'health and well being' would be improved by recognition here of the preventative and restorative health value of access to quality open spaces, the wider countryside and improved biodiversity. These features are important contributors to the population's overall well being. The text at para 5.28 should also recognise this aspect of the health and well being agenda.	Paragraph 5.23 (of the Refining Options document) referred to health and well-being. Text in the joint DPD has been added to the wider health benefits of green infrastructure. See publication document.
National Trust	Green Infrastructure	This is welcomed and supported; the inclusion of a specific reference to the Landscape Character Assessment is entirely appropriate, and indeed necessary. The Trust continues to support the recognition of the important relationship with the Peak District National Park and the need to ensure that its character, and the views to and from it, are not adversely affected.	Support noted.
National Trust	Minerals	The Trust remains concerned that there is not a specific reference to wider sustainable development objectives, including the need to safeguard and enhance environmental assets. Whilst it is recognised that there are site specific considerations with minerals developments in terms of where resources naturally occur, it is nonetheless important to consider the wider environmental impacts both in terms of the overall acceptability of exploiting a particular resource and also, where permitted, the environmental considerations relating to a) the operation of the extraction process, and b) the restoration and after use of the site.	The LDF has to be read as whole. Policy 6 and Policy 21 cover environmental assets matters. In addition, the AGMA joint minerals plan that is being prepared will deal with these matters. Comments have been forwarded to GMGU who are preparing the joint minerals plan.
National Trust	Local Environmental Quality	<p>It is considered that a minor change is needed to bullet ii as follows: “does not have an unacceptable impact on the environment or human health caused by air quality, odour, noise, vibration and or light pollution; and”</p> <p>Bullet point iii makes specific reference to the home and workplace, but by implication would not apply to educational, leisure or other establishments or sites. The following alternative is suggested: “does not cause significant harm on residential and workplace amenity of to the occupants, and future occupants of the development or to existing and future neighbouring occupants users through impacts on privacy, safety and security,</p>	Comment noted. See publication document.

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		noise, pollution, the visual appearance of an area, access to daylight and or other nuisances; and”	
National Trust	Housing	It is requested that the second sub-bullet point is supplemented to include the words “historic environment”.	Text in the joint DPD amended to include reference to “historic environment”. See publication document.
National Trust	Gypsies and Travellers	Whilst the overall approach is supported in principle, the Trust objects to the detailed policy wording, in particular the absence of more detailed criteria that set out locational requirements having particular regard to the potential for adverse impacts upon green belt, landscape character, and natural and built environment features (including their settings).	<p>Support for the overall principle is noted. In terms of the detailed policy wording, the LDF has to be read as a whole. Policy 1, Policy 6, Policy 21 and Policy 22, together with Policy 12, would be used to determine any site locations or planning applications for a Gypsies and Travellers site. These policies would pick up all the criteria listed. Any proposals would be assessed against:</p> <ul style="list-style-type: none"> • PPG2 in terms of Green Belt proposals. • our Landscape Character Assessment document in terms of landscape character. • our natural and built environment policies. <p>Text added to the joint DPD (policy 12 supporting text) to ensure cross reference to the above policies to address these points. See publication document.</p>

Comment from	Refining Options section / policy	Comment	Council Response
National Trust	Energy	<p>It is considered that the Policy as drafted here has addressed the concerns raised previously by the National Trust regarding the energy hierarchy and in particular the need for greater prominence to be given to energy conservation. Accordingly the Trust is now pleased to support the latest approach to Carbon Dioxide Emissions Reduction Targets.</p> <p>In most respects the Trust is also supportive of the rest of the Policy, but it does have a particular question in respect of the approach to Green Energy Schemes and bullet point viii. It is agreed that the detailed considerations set out here are indeed most appropriate to, wind energy developments; however, some of these considerations will also be appropriate to other forms of renewable energy development such as hydro or solar arrays. Accordingly the following change is suggested: “the visual amenity of the local area, including the sensitivity of local landscape character, through the number, scale, size and siting of renewable energy infrastructure, such as wind turbines, impact on the skyline, cumulative impact or the need for new power lines for connection to the supply grid; and”</p> <p>Generally the supporting text relating to Green Energy Schemes is well drafted and supported, although it is a slight surprise that there is no specific reference to solar energy in paragraph 6.83.</p>	<p>Support noted.</p> <p>Text of the joint DPD amended to along the lines suggested to provide greater clarity on the policy. See publication document.</p> <p>The phrase “microgeneration” also encompasses the term “solar power”. List of definitions is provided in the glossary. See publication document.</p>
National Trust	Water and Flooding	<p>The Trust supported the previously proposed approach to the water environment and considers that this has been improved in the current proposed policy. In particular the addition of bullet points d and e is especially helpful.</p>	<p>Support noted.</p>
National Trust	Design	<p>It is considered that the Policy, or the supporting text, should be amended to pick up the issues previously identified:</p> <ul style="list-style-type: none"> ▪ “Enhancing identity and sense of place” – should make specific reference not only to landscape character but now to the Landscape Character Assessment. ▪ “Ease of Movement” – remains restricted in the supporting text to ‘buildings 	<p>Comment noted.</p>

Comment from	Refining Options section / policy	Comment	Council Response
		<p>and facilities within an area' rather than embracing wider considerations that are important to the Objective relating to well being and quality of life, in particular access to nature and the wider countryside – generally such assets are neither 'buildings' nor often thought of as 'facilities' (the dictionary definition relating more to something that is designed or created to provide a service or fulfil a need, i.e. the result of human intervention rather than a natural resource). The term "the buildings, and facilities, nature and open spaces within it" would be more apposite.</p>	
National Trust	Protecting Natural Environmental Assets	<p>The Trust objects to the wording "balanced by" in the introductory sentence. It is considered that this wording is inconsistent with the integrated approach to sustainable development set out in PPS1. It is suggested that "New development and growth pressures must be balanced by protecting, conserving and enhancing accompanied by the protection, conservation and enhancement of our..." would be appropriate.</p> <p>Bullet point b requires a small amendment: "...habitats and protected by law...".</p> <p>The revised wording from the preferred options no longer seeks to "promote woodland in appropriate locations".</p> <p>The approach to "unavoidable development" in bullet point b ii does not conform to RSS Policy EM1 – specifically it does not include reference to compensation and the consequent overall 'no net loss' approach. The addition of wording at the end such as "...will be minimised through design and mitigation measures with any residual adverse impacts being compensated for so that overall there is no net loss" would be appropriate.</p> <p>The inclusion of supporting information drawn from the Landscape Character Assessment is very much welcomed.</p>	Comments noted.

Comment from	Refining Options section / policy	Comment	Council Response
National Trust	Protecting Open Land	This is supported. It is considered that the wording in the supporting text (and also the reference to the additional advice and guidance that is to be provided on the Policy) can adequately address the concern raised at Preferred Options stage regarding the wider role of the Green Belt and Other Protected Land within the borough in respect of landscape character, in particular with reference to the setting of the Peak District National Park.	Support noted.
National Trust	Open Spaces and Sports	This Policy is supported; it is considered that the introductory text to the Policy (in the orange box) has successfully taken on board the concerns raised previously about the quality of open spaces and their potential to address biodiversity issues.	Support noted.
National Trust	Historic Environment	Overall this Policy is supported and the changes to the introductory section are considered to be a significant and needed improvement. It is considered that some further review may now be necessary in the light of the recently issued PPS5 and in particular its reference to, and definition of, “designated heritage assets” and “heritage assets”. The Trust does however remain concerned that the detailed advice at the end of the Policy on Scheduled Monuments (under ‘Other Designations’) does not make specific reference to the settings of such assets – often these are under greater threat than the Monuments themselves.	Support noted. Policy 24 in the joint DPD has been amended to reflect comments made by English Heritage. See publication document.
National Trust	General	Overall the National Trust welcomes the fact that a number of significant improvements have been made to the Core Strategy as a result of the work to refine the preferred options.	Support noted.
NWDA	Vision	Generally supported	Support noted.
NWDA	Objectives	No concerns.	Support noted.
NWDA	Housing	Need a higher housing target.	RSS has been abolished. The LDF will provide sufficient homes to meet the needs of the borough’s communities.

Comment from	Refining Options section / policy	Comment	Council Response
NWDA	Promoting Sustainable Regeneration and Prosperity	Supports reference to rural diversification.	Support noted.
NWDA	Green Infrastructure	Greater clarity on policy wording required.	Policy 6 has been clarified by the addition of the term 'where appropriate' in the opening sentence. See publication document.
NWDA	Housing	Concerned about reference to local character, but support reference to high value housing.	Comment and support noted. Joint DPD has been amended for clarity. See publication document.
NWDA	Employment Areas	Further justification for the release of Foxdenton required within the policy.	The joint DPD has been amended to strengthen the case for Foxdenton. See publication document.
NWDA	Gateways and Corridors	Supports reference to Metrolink	Support noted.
Sport England	Vision	There is no reference to the approach that will be taken to the topic of open space, sport and recreation and this appearing as an issue that will have been addressed within a number of the sub-areas.	The reference to "Green Infrastructure" encompasses "open spaces".
Sport England	Objectives	Sport England welcomed the inclusion of the Objective (at the Preferred Options stage) which recognised the link between sport and recreation and health and well being and specifically set out the approach for developing more specific policies which seek to maintain and enhance open space, sport and recreation facilities. However, we recommend that the wording is added slightly to ensure that this objective covers the provision of new/additional open space, sport and recreational facilities where there are current and future needs across the plan	Support and comment noted. SO5 refers to open spaces within the broadest sense. The details of current and future needs are picked up in Policy 23 on open spaces and sports.

Comment from	Refining Options section / policy	Comment	Council Response
		period – after ‘..... <i>sport and recreation facilities</i> ’, would suggest adding the following wording, ‘ <i>to meet current and future needs</i> ’.	
Sport England	Climate Change and Sustainable Development	Point L. – would suggest that the wording be amended to include reference to new development protecting as well as respecting Oldham’s natural environment, green infrastructure etc. ‘ <i>Ensure development respects and protects Oldham’s natural, built and historic environments, green infrastructure.....</i> ’. This would then reflect the protection role afforded by PPG 17 to open space, sport and recreation facilities.	The word “respects” was used in the context of its dictionary definition meaning as to “pay proper attention to”. Therefore it is considered appropriate to continue with “respects” in the policy.
Sport England	Communities	<p>The policy states that the Council will support proposals for new and improved community facilities that meet an identified need by working with partners and through the use of developer contributions. ‘Community facilities’ is later defined and includes indoor built facilities for sport and recreation. Sport England welcome the reference to a strategic approach to new facility provision based on demand and need and the inclusion of indoor facilities for sport. However, it is not clear whether the Council’s PPG 17 assessment included indoor sports facilities. Paragraph 2 of PPG17 states that “As a minimum, assessments of need should cover the differing and distinctive needs of the population for open space and built sports and recreational facilities”. The Annex to PPG 17 further states that “For the purposes of assessments of need and audits of existing built facilities for sport and recreation, local authorities should use a typology which includes swimming pools, indoor sports halls and leisure centres, indoor bowls centres, indoor tennis centres, ice rinks, community centres, and village halls”. The omission of these facilities from the Study and the resulting lack of evidence to support the need for such facilities would bring into question the Council’s ability to secure developer contributions towards their provision and/or enhancement.</p> <p>Equally, whilst the policy promotes proposals for new and improved community facilities, there is no reference within the policy wording itself in relation to the</p>	Comment noted. The council has addressed the issue of indoor sports facilities. This has been discussed as part of the Facilities Strategy for the borough. This work has now progressed as part of a review of the council’s Leisure Estate. It outlines an approach to taking forward the future delivery of indoor sports facilities in the borough. This work has regard to PPG17 guidance. As the joint DPD indicates, the council will provide further advice and guidance on LDF policy 2. The joint DPD indicates that regard will be had to local guidance and studies. The review of the Leisure Estate will inform the LDF and will be a material consideration in planning decisions. The Infrastructure Study also

Comment from	Refining Options section / policy	Comment	Council Response
		<p>protection of such facilities from loss to alternative forms of development. This is referred to in the supporting text but without a specific hook within the policy, we would question the weight that could be attached to the supporting text in isolation. We suggest that the protection role for such facilities is included within the policy. In terms of the approach to alternative forms of development for such facilities, Sport England does have concerns with regard to the reference to developments for non-educational/community uses being permitted where they would achieve broader or wider planning and regeneration objectives. This does not follow the advice contained within PPG 17 and has the potential to undermine the policy approach towards the protection of such facilities (particularly where an explanation of what broader planning and regeneration objectives are is not specifically outlined). The Local Planning Authority will in any case be able to weigh other broader planning and regeneration objectives in the balance as material considerations in the determination of specific applications on a case by case basis and as such we do not see the need for a blanket approach to be detailed within the policy, given the implications that this could have for the protection of such facilities. Sport England would therefore suggest that this reference be deleted.</p>	<p>includes details of indoor sports facilities and the review of the Leisure Estate, and will be used to inform planning decisions. The LDF has to be read as a whole. As noted by Sport England, the protection of community facilities is referred to in the policy supporting text which is considered appropriate. The policy sets out the circumstances whereby alternative forms of development may be permitted. This is considered appropriate. This continues with the approach set out in the 2006 UDP, which was subject to a planning inquiry and was found to be acceptable within the context of national policy.</p>
Sport England	Promoting Sustainable Regeneration and Prosperity	<p>We would like to see the references to the diversification of the rural economy to recognise the role and opportunities that both sport and recreation can have in such locations as well business purposes.</p>	<p>Comment noted. Joint DPD has been amended as suggested. See publication document.</p>
Sport England	Green Infrastructure	<p>Again Sport England previously welcomed the inclusion of a policy covering green infrastructure which itself is later defined as including open spaces and provision for outdoor sports. In terms of further specific comments, the policy comments that in allocating sites and determining planning applications, the Council will have regard to a range of national, regional, sub-regional and local guidance and then provides a list of such guidance. However there is no reference to PPG 17 (or any subsequent/superseding guidance e.g. PPS 17) within this list – given that this national guidance specifically covers open space,</p>	<p>Comment noted. PPG 17 added to list of documents. Policy 6 sets the overall context for Green Infrastructure (which includes open spaces and sports), and Policy 23 then sets out more specific policy details relating to open spaces and sports. Text added to joint DPD to</p>

Comment from	Refining Options section / policy	Comment	Council Response
		<p>sport and recreation (which covers the majority of the typologies that are included within the definition of green infrastructure) we would expect this document to be referenced here. In terms of the specific operation of the policy, it would be useful to know how this policy operates differently to Policy 23 Open Spaces and Sports as both of these policies include a protection and provision role which cover similar topic areas. The supporting justification at paragraph 5.54 makes reference to a number of more strategic green infrastructure assets shown on the proposals map – is it the intention that this policy will only apply to those sites identified on the proposals map and Policy 23 apply to specific, individual sites? Further explanation would be useful here.</p>	<p>clarify this. Policy 23 applies to all open spaces, however only the larger sites will be shown on the proposals map. (This is the same approach that was used in the UDP). Text added to joint DPD to clarify this. See publication document.</p>
Sport England	Protecting Open Land	<p>This policy covers both land designated as Other Protected Open Land (OPOL) and Land Reserved for Future Development (LRFD). Paragraph 6.116 refers to only one site having been identified as LRFD, at Bullcote Lane, Royton. However, the boroughwide profile on pages 7 and 8 refers to a number of sites as LRFD, which will be released for development including of particular interest to Sport England the Lancaster Sports club. I am therefore unsure as to how this policy relates to land designated as LRFD i.e. does this mean that all of these sites will be effectively afforded Green Belt protection until such time that land requirements indicate that they need to be brought forward, or are the sites listed in the borough profile available for development from the outset? In terms of the Lancaster club in particular, it should be borne in mind that this facility includes a large area of playing field used actively for pitch team sports which includes high quality pitches (including football and cricket, the former to high standard at senior league level), as well as other sporting facilities including changing accommodation, small sided, floodlit five-a-side pitches and bowling greens. It should be made explicit within the policy or the specific designation for this site that the loss of this site to alternative forms of development will only be permitted where the proposal would provide for genuine replacement facilities of an equivalent or greater quantity, equivalent or better quality in a suitable location prior to the loss of any existing facilities from this site.</p>	<p>Comment noted. The UDP had five LRFD sites designated. In the LDF, only one of those designations (Bullcote Lane) will continue as LRFD. As already stated in the joint DPD, in future reviews of the LDF this land will be considered if other allocated land and brownfield land is insufficient to meet future development needs. Sites will be dealt with as part of the Site Allocations DPD. Policy 23 makes it clear that it applies to sites that are currently or most recently used as an open space, sport or recreation facility.</p>

Comment from	Refining Options section / policy	Comment	Council Response
Sport England	Open Spaces and Sports	<p>Again, Sport England welcomed the inclusion of a specific policy relating to this topic area and the reference to sport. Equally, the setting of local standards that cover quantity, quality and accessibility is in line with guidance contained in PPG 17. However, there are some additional comments to make here given the passage of time. Firstly, as outlined earlier the omission of indoor sports facilities is of concern and could have implications in terms of securing new provision for such facilities and improvements/enhancements to such facilities on the back of developer contributions. Secondly, in terms of the quantitative standard for outdoor sports facilities, it is unclear as to how the figure of 1.35ha's per 1,000 population has been arrived at and from what study i.e. is this a local standard derived directly from a robust playing pitch assessment or a crude national standard? There was not a copy of the PPG 17 Study available on the Evidence Base tab on the website, however Sport England is aware that the Council undertook such a study back in 2006 and that the playing pitch assessment and strategy for the borough dates back to 2004. These documents are now somewhat dated, particularly in terms of the playing pitch assessment and potentially will not have taken into account the level of growth to be delivered through the Core Strategy. We are also not aware of any specific updates to these particular studies. In terms of playing pitch assessments Sport England's position is that those which are more than 3 years old are out of date. Towards A Level Playing Field (the recommended methodology for producing playing pitch strategies) emphasises the importance of keeping the data underpinning a playing pitch assessment up to date and states that data should, as a minimum, be updated every two years. Consideration of the sports pitches standard above raises a broader question, and that is how will updated standards be incorporated into the core strategy? As the policy stands, it would seem likely that a revision to the core strategy would be needed as the policy quotes the actual standards.</p>	<p>Comment noted. The council has addressed the issue of indoor sports facilities. This has been discussed as part of the Facilities Strategy for the borough. This work has now progressed as part of a review of the council's Leisure Estate. It outlines an approach to taking forward the future delivery of indoor sports facilities in the borough. This work has regard to PPG17 guidance. As the joint DPD indicates, the council will provide further advice and guidance. The 1.35ha standard has been derived from the ongoing PPG17 open space study work. Text in joint DPD amended to give reference to new and updated documents, such as the Playing Pitch Strategy. The standards will be monitored and reviewed over the lifetime of the LDF and will be updated as necessary through the appropriate planning mechanisms. See publication document.</p>

Comment from	Refining Options section / policy	Comment	Council Response
Sport England	New Open Spaces	<p>The policy makes reference to ‘all’ residential developments being required to contribute towards open space provision. Sport England interpret this to mean from proposals for single dwellings upwards however it would be useful if this could be made explicit within the policy. Sport England would support such an approach as a way of addressing the additional demands and needs arising from cumulative small-scale development proposals within the borough. Sport England would also like to see this policy cover other non-residential uses. In the context of sport, non-residential developments, such as retail, business/ industrial, hospitals and hotels can place pressures on existing sport and recreation facilities, as workers and visitors will use the facilities provided for the residential population. For example, workers will use swimming pools, sports halls and health and fitness facilities, as well as informal open space close to their place of employment before, during and after working hours. If the impact of non-residential developments on sport and recreation facility provision is not adequately considered (and no additional provision is made), this can result in additional pressures being placed on nearby facilities provided for the residential population (which may already have exceeded their capacity).</p>	<p>Comment noted. The policy wording is considered to be clear and does not require further clarification.</p>
Sport England	Loss of Open Spaces	<p>There seems to be some confusion regarding the protection afforded to playing fields under this heading, as it appears twice. It would be clearer if a separate section relating to playing fields was included and made clear that development will not be permitted on land used as a playing field (or last used as a playing field) unless one of the 5 exceptions contained in Sport England’s playing fields policy (copy enclosed) can be met – these actually go beyond those referenced in the policy and supporting text. In terms of the reference to the development of other sites last used for sport and recreation and point g. this should include reference to replacement facilities of an equivalent size/quantity so as to accord with paragraph 13 of PPG 17.</p>	<p>Comment noted. The policy wording is considered to be clear and does not require further clarification. Point ‘e’ is a general criterion which relates to outdoor or indoor sports or recreation facilities, whereas point ‘f’ further defines the policy specifically for playing fields. Policy 23 makes it clear that in the case of playing fields, development would have to meet the approval of Sport England. Joint DPD amended to include reference to quantity where</p>

Comment from	Refining Options section / policy	Comment	Council Response
			appropriate. See publication document.
Sport England	Developer Contributions	Reference should be made to the three tests.	Comment noted. See the publication document.
English Heritage	Vision	Supports the Vision.	Support noted.
English Heritage	Employment Areas	Whilst recognising that the LDF has to be read as a whole and that Policy 1 makes reference to mills, it would be helpful if the supporting text to Policy 13 also underlined this approach.	As English Heritage acknowledge, the LDF has to be read as whole. Therefore, in order to ensure for a concise document it is not considered necessary to repeat the text.
English Heritage	Housing	Add "historic environment" to the list of features in criterion f.	Policy amended. See publication document.
English Heritage	Design	Suggests that the list includes as a starting point the need for an informed character appraisal of the site and its context which addresses the historic character. The supporting text could also helpfully refer to the CABE / English Heritage publication, Building in Context.	Comment noted. Policy 24 deals with matters related to historic character.
English Heritage	Historic Environment	Scheduled ancient monuments should not be included within the same grouping as locally significant buildings.	Comment noted. Policy amended to reflect the required change. See publication document.
English Heritage	Historic Environment	Include reference to Conservation Area Appraisals or Management Plans, in the list of documents.	Comment noted. Reference added to the policy. See publication document.

Comment from	Refining Options section / policy	Comment	Council Response
English Heritage	Historic Environment	Although the Key Diagram does not need to show Conservation Areas, they must be shown on the proposals map.	Comment noted. The proposals map will show the conservation areas.
Highways Agency	Spatial Portrait	Para A2.14 - To acknowledge the work that the Agency and the AGMA councils have undertaken on the Transport Protocol, add the following text: <i>“Sections of the Strategic Road Network experience peak traffic flows which can reduce journey time reliability. The challenge of addressing the additional trip generating developments will be essential to facilitating the Core Strategy. Table 13A (page 130) defines the Key Issues which have been identified in partnership with the Highways Agency to ensure that the long term spatial plan can be realised without compromising the operation of the Strategic Road Network”</i>	Comment noted. Text of the joint DPD amended. See publication document.
Highways Agency	Spatial Portrait	Para 2.33 – Add: <i>“Issue 4 of Table 13A (page 130) acknowledges the Air Quality forecasts which have been modelled through the AGMA assessment exercise. The interaction of the authority’s site allocation with the wider Greater Manchester Region and specific receptors will be assessed through the Protocol.”</i>	Comment noted. Text of the joint DPD amended. See publication document.
Highways Agency	Spatial Portrait	Para 2.50 – Add: <i>“Specific measures will be investigated to address any potential increase impact on the Strategic Road Network through area wide and more specific assessments in the Allocations DPD as defined in Table 13A (page 130).</i>	Comment noted. Text of the joint DPD amended. See publication document.
Highways Agency	Spatial Portrait	Para 2.50 – Add: <i>“In acknowledgement of the potential impacts of the Core Strategy proposals on the Strategic Road Network, a Protocol arrangement has been implemented. The Protocol sets out the joint working arrangements and shared approach between the primary organisations involved in defining and addressing the transport impacts of development across Greater Manchester. Key Transport related Issues have been defined for Oldham through an appraisal of the available evidence base. It is envisaged that the Key Issues will be championed through the Protocol and are fundamental factors which have been integrated in to the Core Strategy. The following Key Issues have been defined:”</i>	Comment noted. Text of the joint DPD amended. See publication document.

Comment from	Refining Options section / policy	Comment	Council Response												
		<table border="1" data-bbox="591 395 1541 839"> <thead> <tr> <th data-bbox="591 395 741 459">Key Issue</th> <th data-bbox="745 395 1541 459">Theme</th> </tr> </thead> <tbody> <tr> <td data-bbox="591 462 741 555">1.</td> <td data-bbox="745 462 1541 555"><i>Addressing the forecasted drop in walk and cycle movements alongside decreasing Public Transport patronage and capacity constraints on the PT network;</i></td> </tr> <tr> <td data-bbox="591 558 741 619">2.</td> <td data-bbox="745 558 1541 619"><i>Clustering of employment sites and Journey Times along the M60 clockwise (between Junctions 20 and Junction 22);</i></td> </tr> <tr> <td data-bbox="591 622 741 683">3.</td> <td data-bbox="745 622 1541 683"><i>Journey times along the key radial routes and principally those in proximity to the SRN;</i></td> </tr> <tr> <td data-bbox="591 686 741 778">4.</td> <td data-bbox="745 686 1541 778"><i>Air Quality and the adoption of Low Emission Strategies particularly with regard to the 19.4% forecasted increase in CO2 levels; and</i></td> </tr> <tr> <td data-bbox="591 782 741 839">5.</td> <td data-bbox="745 782 1541 839"><i>The delivery of accessible development to sustainable modes of transport and key services.</i></td> </tr> </tbody> </table> <p data-bbox="591 871 1055 900">Table 13A – The Protocol Key Issues</p> <p data-bbox="591 932 1532 1177"><i>A2.82 “With particular reference to the Key Issues in Table 13A, the impact on the transport network of the development sites being promoted through the LDF will be assessed, both individually and cumulatively, during the development of the Allocations DPD, in partnership with the Highways Agency. Sustainable transport measures and any infrastructure improvements required to enable the sustainable delivery of development, will also be identified and appraised in terms of the level of mitigation afforded and will be supported by evidence to demonstrate the deliverability of each measure.”</i></p>	Key Issue	Theme	1.	<i>Addressing the forecasted drop in walk and cycle movements alongside decreasing Public Transport patronage and capacity constraints on the PT network;</i>	2.	<i>Clustering of employment sites and Journey Times along the M60 clockwise (between Junctions 20 and Junction 22);</i>	3.	<i>Journey times along the key radial routes and principally those in proximity to the SRN;</i>	4.	<i>Air Quality and the adoption of Low Emission Strategies particularly with regard to the 19.4% forecasted increase in CO2 levels; and</i>	5.	<i>The delivery of accessible development to sustainable modes of transport and key services.</i>	
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5.	<i>The delivery of accessible development to sustainable modes of transport and key services.</i>														
Highways Agency	Objectives	Strategic Objective 1 makes clear reference to the transport aspects of development which have been raised through the Protocol. This is welcomed by the Agency, with particular regard to points, d, e, f and g (Page 11). The Agency is content that the Objective effectively communicates the need to mitigate the impact of transport through the promotion of sustainable development. The	Comment noted.												

Comment from	Refining Options section / policy	Comment	Council Response				
		Agency is however keen to integrate the detail of the Protocol and the particular Key Issues in to the wording/supporting text of the relevant Policies.					
Highways Agency	Climate Change and Sustainable Development	There should be specific reference to the Protocol in the form of the additional text in point e: <i>"...consistent with the Transport Protocol (Table 13A, page 130) and specifically Key Issues 1 and 5."</i>	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Climate Change and Sustainable Development	Paragraph 5.16 should be extended to include the following... <i>"... with particular regard to the site allocations which emerge through Policies 11/13 and the relationship with Policies 15/16."</i>	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Climate Change and Sustainable Development	It is recommended that reference is made to the following Key Issues via the Linkages table: <table border="1" data-bbox="622 879 1167 948"> <thead> <tr> <th colspan="2" data-bbox="629 884 1160 911">Linkages</th> </tr> </thead> <tbody> <tr> <td data-bbox="629 914 1003 941">Transport Protocol Key Issue</td> <td data-bbox="1008 914 1160 941">1,4,5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	1,4,5	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	1,4,5						
Highways Agency	Promoting Sustainable Regeneration and Prosperity	<p>The Agency welcomes the reference to the need for accessible links to the neighbouring authorities Strategic Sites, namely, Kingsway/Ashton Moss/Central Park/Manchester Basin/Oxford Road. The cross-boundary factors are as important as the internal dynamics of the Authority and further commentary on the delivery of Public Transport connections between these sites should be contained in any forthcoming DPDs.</p> <p>The Foxdenton site represents approximately half of the employment land for the Core Strategy. The need for a comprehensive appraisal of the site is discussed further in other sections of this response. The Agency does not wish to see additional commentary in the wording of Policy 4 given the dedicated Accessibility and Transport text in Policy 5.</p>	Comment noted. Text added to joint DPD. See publication document.				

Comment from	Refining Options section / policy	Comment	Council Response				
		<p>It is recommended that reference is made to the following Key Issues via the Linkages table:</p> <table border="1" data-bbox="622 459 1167 523"> <thead> <tr> <th colspan="2" data-bbox="622 459 1167 491">Linkages</th> </tr> </thead> <tbody> <tr> <td data-bbox="622 491 1003 523">Transport Protocol Key Issue</td> <td data-bbox="1003 491 1167 523">2,5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	2,5	
Linkages							
Transport Protocol Key Issue	2,5						
Highways Agency	Promoting Accessibility and Sustainable transport choices	<p>The standalone Policy for accessibility and sustainable travel is welcomed. There are opportunities to further enhance the wording of what the Council will facilitate within the green box text. It is felt that the following points should be included to enhance the delivery of the Policy on a more overarching level and with regard to the Protocol:</p> <ul style="list-style-type: none"> “g. reduce the need and distance travelled consistent with National Policy; h. integrate development within a multimodal network, promoting connections and interchange facilities; i. capitalise on the opportunities associated with Park and Ride sites as discussed in Policy 17; and j. deliver service enhancement of the public transport infrastructure which will be reviewed to assess the available capacity. <p>The Council will also take account of the Protocol arrangements with the Highways Agency and continuously monitor the cumulative transport impacts alongside the assessment of individual site characteristics.”</p>	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Promoting Accessibility and Sustainable transport choices	<p>Point c could also be extended to include the following text, <i>“...Where feasible all pedestrian and cycle movements will be prioritised consistent with the road user hierarchy”</i></p> <p>Although reference is already implied to the hierarchy in paragraph 6.98 point d (page 82).</p>	Comment noted. Text added to joint DPD. See publication document.				

Comment from	Refining Options section / policy	Comment	Council Response
Highways Agency	Promoting Accessibility and Sustainable transport choices	The main concern relates to the relationship between Foxdenton and Policy 5. The site does not appear consistent with some of the general themes, particularly accessibility, of the Policy and will need careful consideration going forward. The site does not benefit from the defined 800m access to a heavy rail or Metrolink station.	Comment noted. See publication document.
Highways Agency	Promoting Accessibility and Sustainable transport choices	There is an opportunity for the Agency to be specifically named on the Implementation text on page 36.	Comment noted. Text added to joint DPD. See publication document.
Highways Agency	Promoting Accessibility and Sustainable transport choices	The Agency would also like to see reference to the mapping exercise which was undertaken to represent a composite of service types. Further commentary is contained later in this response but the following key text should be added to paragraph 5.49 (page 36) <i>"The Highways Agency has also undertaken a comprehensive accessibility mapping exercise which provides a supporting analysis of the relative accessibility of the authority to a composite of service types."</i>	Comment noted. Text added to joint DPD. See publication document.
Highways Agency	Promoting Accessibility and Sustainable transport choices	The supporting text within paragraph 5.50 where the Highways Agency is referenced we understand will include revised commentary with regard to the joint AGMA work and the Protocol arrangements. Below is a suggestion for such a revision: <i>"The final report is still a work in progress, but an emerging conclusion is the need for neighbouring authorities and the Highways Agency to work more closely in the future to understand the cumulative effects of development proposals. The analysis of the modelling has enabled key transport related issues to be defined and a Protocol arrangement to be agreed with stakeholders. The Protocol and Key Issues are discussed in Table 13A (page 130) and represent where further work will need to be undertaken to facilitate the Core Strategy and associated Site Allocations."</i>	Comment noted. Text added to joint DPD. See publication document.

Comment from	Refining Options section / policy	Comment	Council Response				
Highways Agency	Promoting Accessibility and Sustainable transport choices	Given the proposed development sites, and most notably the collective 'Arc of Opportunity', it is considered prudent to include supporting text after paragraph 5.51 to discuss further commitments. (An alternative location for the inclusion of this text is within Policy 13): <i>"A collective modelling exercise, defined in unison with the Protocol Key Issues, will be facilitated to appraise the impacts of the Foxdenton site and the wider 'Arc of Opportunity'. The Council will provide further detail in partnership with key stakeholders, through the Allocations DPD. It is envisaged that the modelling work will review the impact on the Strategic Road Network and wider Public Transport requirements to enable sustainable growth"</i> .	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Promoting Accessibility and Sustainable transport choices	It is recommended that reference is made to the following Key Issues via the Linkages table: <table border="1" data-bbox="622 735 1167 804"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>1,2,3,4,5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	1,2,3,4,5	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	1,2,3,4,5						
Highways Agency	Local Environment	There is no reference within the Policy to the Low Emission Strategies (LES) as outlined on page 23. Given the theme of the Policy it may be appropriate to include specific reference to the opportunities to use the good practice guideline for applying the planning system to reduce transport emissions. An Air Quality SPD is discussed in paragraph 6.14, which should integrate the AQMAs and LES within a comprehensive guidance document.	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Local Environment	It is recommended that reference is made to the following Key Issues via the Linkages table: <table border="1" data-bbox="622 1109 1167 1177"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>4</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	4	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	4						
Highways Agency	Housing	There is an opportunity to include specific reference to Protocol - Key Issue 5 within the supporting green box text given that it is particularly relevant. It is suggested that the wording is revised accordingly: <i>"f. i. Public transport accessibility and access to key services,</i>	Comment noted. Text added to joint DPD. See publication document.				

Comment from	Refining Options section / policy	Comment	Council Response				
		<i>consistent with key issue 5 in Table 13A (page 130);</i>					
Highways Agency	Housing	<p>It is also considered appropriate to include within the supporting text the following commentary after paragraph 6.29:</p> <p><i>“In bringing forward the proposed housing developments (along with other development proposals) there are likely to be direct implications on aspects such as the transport network. Therefore the specific impact of housing sites on the transport network, both individually and cumulatively, will be assessed during the development of the Allocations DPD.”</i></p>	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Housing	<p>It is recommended that reference is made to the following Key Issues via the Linkages table:</p> <table border="1" data-bbox="622 826 1167 892"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>1,5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	1,5	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	1,5						
Highways Agency	Employment Areas	<p>There is an opportunity to include reference to a wider modelling exercise of the Foxdenton site as an alternative to the text discussed previously for inclusion in Policy 5. There should however be an accompanying discussion within the supporting text to acknowledge the following: <i>“In bringing forward the proposed employment areas (along with other development proposals) there are likely to be direct implications on aspects such as the transport network. Therefore the specific impact of employment sites on the transport network, both individually and cumulatively, will be assessed during the development of the Allocations DPD.”</i></p>	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Employment Areas	<p>It is recommended that reference is made to the following Key Issues via the Linkages table:</p> <table border="1" data-bbox="622 1257 1167 1323"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>2,3,5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	2,3,5	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	2,3,5						

Comment from	Refining Options section / policy	Comment	Council Response				
Highways Agency	Supporting Oldham's Economy	Consistent with the additional text for Policy 5 it is recommended that the wording is revised to include reference to providing additional capacity on Public Transport services with the green box text (page 65): <i>"d. iv. Contributions to new bus services and/or additional capacity on existing public transport routes, where appropriate, to support residents in travelling to employment locations; or"</i> .	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Supporting Oldham's Economy	It is recommended that reference is made to the following Key Issues via the Linkages table: <table border="1" data-bbox="622 614 1167 679"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>1,5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	1,5	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	1,5						
Highways Agency	Centres	The relative accessibility to/from the Centres and the housing/employment allocations will be an essential component of the Policy. It is perhaps all the more important that reference is made to the opportunity to improve interchange facilities at these 'hub' locations within the supporting text.	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Centres	It is recommended that reference is made to the following Key Issues via the Linkages table: <table border="1" data-bbox="622 912 1167 978"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	5	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	5						
Highways Agency	Local Services and Facilities	The interaction with Policy 11,13 and 15 had already been discussed and there is further detail on the Agency mapping exercises referenced in Policy 5.	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Local Services and Facilities	It is recommended that reference is made to the following Key Issues via the Linkages table: <table border="1" data-bbox="622 1195 1167 1260"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	5	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	5						

Comment from	Refining Options section / policy	Comment	Council Response
Highways Agency	Gateways and Corridors	Should this Policy be named 'Gateways and <u>Transport</u> Corridors' given the focus on Metrolink, Walking, Cycle and Bridleway Network and Transport Infrastructure?	Comment noted. Title unchanged in the joint DPD.
Highways Agency	Gateways and Corridors	<p>It is also recommended that the green box text is expanded to include a dedicated section on Public Transport Infrastructure and the Strategic Road Network:</p> <p>"Public Transport - The Council will deliver development whilst promoting and securing Public Transport Investment by:</p> <ol style="list-style-type: none"> a. Understanding the dynamic interaction between all Public Transport services and walk/cycle movements; b. Liaison with GMPTE and interested parties to deliver services/capacity consistent with the requirement of the Site Allocations; and c. Secure funding from developers where investment in Public Transport is required to release sites identified within the Site Allocation DPDs. <p>Strategic Road Network - Given the findings of the Greater Manchester level transport modelling, further investigation of issues on the Strategic Road Network associated with the proposed developments will be undertaken during the preparation of the Allocations DPD, consistent with the Protocol arrangements. The additional demand will impact most evidently between Junctions 20 and Junction 22 of the M60. The M60 is a key part of the transport network, not only for Oldham, but for the Manchester City Region and as part of the network of national importance. It is therefore crucial that the performance of the Strategic Road Network is safeguarded in order that it can continue to provide this role and support the wider economic aspiration of the City Region. A key element of the review of the interaction of the spatial plan and the transport impact will be to understanding and address any impact on journey times, consistent with the Transport Protocol (Table 13A, page 130) and specifically Key Issues 2 and 3."</p>	Comment noted. Text added to joint DPD, except references to "Manchester City Region" changed to "Greater Manchester". See publication document.

Comment from	Refining Options section / policy	Comment	Council Response				
Highways Agency	Gateways and Corridors	The supporting text outlines in paragraph 6.66 what the Metrolink expansion will deliver. It is important to acknowledge that it is unclear how much of these benefits will facilitate development at Foxdenton. Consequently a comprehensive exercise will need to be undertaken which addresses the connectivity and accessibility of the site.	Comment noted.				
Highways Agency	Gateways and Corridors	It is recommended that reference is made to the following Key Issues via the Linkages table: <table border="1" data-bbox="622 584 1167 651"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>1,2,3,5</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	1,2,3,5	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	1,2,3,5						
Highways Agency	Design	It is recommended that reference is made to the following Key Issues via the Linkages table given the commentary in paragraph 6.98 which relates to public transport: <table border="1" data-bbox="622 799 1167 866"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>1</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	1	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	1						
Highways Agency	Developer Contributions	The Agency would ask that Oldham Council considers including in the green box text: <i>“Access and transport contributions will take account of the DaSTS methodology which places an emphasis on capitalising on the existing network capacity before major capacity enhancements are considered. The hierarchical approach will explore and exhaust all alternatives before presenting major works on the Strategic Road Network.”</i>	Comment noted. Text added to joint DPD. See publication document.				
Highways Agency	Developer Contributions	It is recommended that reference is made to the following Key Issues via the Linkages table: <table border="1" data-bbox="622 1142 1167 1209"> <thead> <tr> <th colspan="2">Linkages</th> </tr> </thead> <tbody> <tr> <td>Transport Protocol Key Issue</td> <td>1,2,3</td> </tr> </tbody> </table>	Linkages		Transport Protocol Key Issue	1,2,3	Comment noted. Text added to joint DPD. See publication document.
Linkages							
Transport Protocol Key Issue	1,2,3						

Comment from	Refining Options section / policy	Comment	Council Response
Highways Agency	Monitoring	<p>Page 105 currently identifies 4 monitoring indicators which will be used to review the performance against key targets relevant to Transport. The Agency welcomes the indicators but would be keen to explore opportunities to integrate the delivery of the Protocol as tangible and measureable indicators. There is scope to expand the broad set of indicators to either directly reference performance against the Key Issues, or extend the targets to consider elements such as:</p> <ul style="list-style-type: none"> • Contribution to infrastructure investment (namely Public Transport); • Bus Miles Operated; • Length of Cycle Routes; • Park and Ride Spaces; • Average Daily Traffic Flows; • Average Journey Times; and • Sustainable delivery of Foxdenton and associated impact analysis (extension of Indicator 46). <p>The criteria for Indicator 23 should also be defined, either with regard to the definitions in Policy 5 or service types accessible with 30 minutes travel time. These targets are also not considered to be particularly challenging and should be justified accordingly.</p> <p>Indicator 30 (Number of day of air pollution) should also consider the opportunity to include the application of Low Emissions Strategies/Percentage change in Carbon Dioxide Emissions.</p>	Comment noted.
Highways Agency	General comments	<p>It is acknowledged that, what were previously defined as Strategic Sites, have now been presented as Business and Employment Area/Saddleworth Employment Areas. The Foxdenton site will be allocated for employment with limited housing, a Masterplan is awaited and phasing will be critical as well as detail commitments in the Site Allocations DPD given the accessibility concerns.</p> <p>The Agency also welcomes the following, subject to any clarifications:</p>	Comment noted.

Comment from	Refining Options section / policy	Comment	Council Response
		<ul style="list-style-type: none"> • Metrolink commitment; • Railway capacity improvements protected at Diggle/Standedge Tunnel; • Proposed Shaw and Crompton Park and Ride; • Forthcoming Technical Evidence Papers (will Transport be discussed?); • Low Emissions Strategies commentary (subject to comprehensive coverage); • Recognition of Kingsway/Ashton Moss/Central Park/Manchester Basin/Oxford Road Area; • Additional correspondence concerning where transport elements have been referenced following consultation meeting; and, • Infrastructure Plan: Is this still a commitment as there is no reference in the Report? (with the exception of reference with paragraph 6.134, page 103 which refers to a local infrastructure study which is being prepared). 	
Highways Agency	Supporting maps	<p>The Agency would advise caution in presenting the two mapping exercises which have been prepared for access to services and Public Transport. We don't feel the access to services mapping accurately represent the composite accessibility of multiple services. It appears that the buffer zone only reflects the boundary of each individual service and not the accessibility of an area to all the available service types. The previously presented Highways Agency work sought to combine the public transport accessibility alongside access to key services and therefore provides a more comprehensive representation of specific area accessibility.</p>	Comment noted.
Highways Agency	Overall Summary	<p>The Agency is keen to integrate the Key Issues as defined through the Protocol within the Core Strategy document. Appropriate wording has been suggested for inclusion within the document for consideration to address the fundamental need for Transport factors to be clearly defined for further assessment. Additional text has also been presented for inclusion with regard to specific Policy wording to enhance the delivery of the vision and the integration of National Transport Policy.</p> <p>The specific concerns relating to the Foxdenton site and its relationship with</p>	Comment noted.

Comment from	Refining Options section / policy	Comment	Council Response
		<p>Policy 5 have been identified. The Agency acknowledges that this site is required to meet the Authorities regional employment allocation but there will need to be detailed undertakings within the Allocations DPD to facilitate the site and ensure that the development retains the wider vision of the Core Strategy with regards to sustainable development.</p> <p>The representation of appropriate accessibility mapping is also a request of the Agency to ensure future developers are effectively informed of the characteristic of a site and the need for wider investment.</p>	
GMPTE	Introduction	The main issues and key challenges summary is very brief. Need to expand to include reference to traffic congestion and its impacts on bus journey times and reliability, the integration of development with the transport system, motorway based commuting to employment sites such as Hollinwood and Foxdenton, and the need to encourage travel by sustainable modes.	Comment noted. Text added to the joint DPD. See publication document.
GMPTE	Objectives	GMPTE broadly in support of the objectives, but suggest improvements as follows: SO1 (f) – amend the reference to Metrolink to read “...and implementing the Metrolink extension proposals across the borough.”. SO1 (g) – there is also an impact of congestion on the local road network and the resulting impact on bus journey times and reliability.	Comments noted. SO1 f amended to include reference to Failsworth and Oldham Town Centre. See publication document.
GMPTE	Climate Change and Sustainable Development	Reference to “green energy” could also be worded to include the use of electric vehicles.	Comment noted. Reference to ‘modern modes of transport’ included in Policy 5. See publication document.
GMPTE	Communities	It will be important to ensure that facilities are not only located where public transport accessibility is high, but also to ensure that physical infrastructure is provided where required.	Comment noted. Policy 3 deals with access to key services.
GMPTE	An Address of Choice	How is the reference to 480 metres or approximately ten minutes walk of key services justified? How does it link to the 400 metres threshold for public transport accessibility in Policy 5?	Comment noted. They are two thresholds for different purposes. The former deals with access to services for residential

Comment from	Refining Options section / policy	Comment	Council Response
			developments, and the latter deals with access to public transport routes.
GMPTE	Promoting Sustainable Regeneration and Prosperity	Despite reasonably frequent bus services on Broadway and on Foxdenton Lane, much of the Foxdenton site is beyond reasonable walking distance from these bus stops and is therefore not very accessible by public transport. Measures to improve accessibility will be needed so as to avoid reliance on the car.	Comment noted. Text added to Policy 14, which now includes further details on Foxdenton. See publication document.
GMPTE	Promoting Accessibility and Sustainable Transport Choices	Part (a) of the policy includes definitions of public transport accessibility. In reality access to bus services is only available at bus stops or bus stations (unless the service is hail and ride) at it is important to clarify that the 400 metres threshold is a walking distance rather than a straight line on a map. Suggests amending the threshold categories accordingly. To “within approximately 400 metres walking distance from a bus stop with a service or combination of services with a frequency (daytime Monday – Saturday) of every 10 minutes”, for examples. The other categories could be “more frequent than a half hourly service”, “a half hourly service” and “a less frequent service”.	Comment noted. The policy sets the overall framework for promoting public transport accessibility and the thresholds have been created with that principle in mind. The measurements are ‘approximates’ and their application will be determined on a case by case basis within that context.
GMPTE	Promoting Accessibility and Sustainable Transport Choices	Part (b) of the policy promotes Metrolink and encourages developments that are accessible to it, but it should also make reference to promoting and encouraging interchange between Metrolink and other modes such as bus, walking and cycling.	Comment noted.
GMPTE	Promoting Accessibility and Sustainable Transport Choices	The policy should include a number of further sections that state: <ul style="list-style-type: none"> • The council will promote and encourage facilities to improve interchange between modes including park and ride where appropriate. • The council will promote and encourage opportunities to improve the quality and reliability of the public transport network. • The council will promote and encourage infrastructure for electric vehicles 	Comment noted. See publication document.

Comment from	Refining Options section / policy	Comment	Council Response
		where appropriate.	
GMPTE	Promoting Accessibility and Sustainable Transport Choices	Paragraph 5.50 should be updated to reflect the fact that the AGMA / Highways Agency Transport Protocol has been completed since the Refining Options document was published.	Comment noted. See publication document.
GMPTE	Promoting Accessibility and Sustainable Transport Choices	Policy promotes accessibility and sustainable transport choices. It is noted that the Foxdenton site does not achieve high accessibility or very high accessibility, and therefore the joint DPD should include some appropriate mitigation measures to ensure the site will perform against these criteria.	Comment noted. Text added to Policy 14, which now includes further details on Foxdenton. See publication document.
GMPTE	Supporting Oldham's Economy	GMPTE would expect the proposed Foxdenton masterplan to include an assessment of the site's public transport accessibility and the possible mitigation measures to improve its accessibility.	Comment noted. Text added to Policy 14, which now includes further details on Foxdenton. See publication document.
GMPTE	Gateways and Corridors	Further explanation is required in the joint DPD about the existing transport routes and networks and safeguarding land for future infrastructure improvements that are listed.	Comment noted. Text added to the joint DPD. See publication document.
GMPTE	Design	Paragraph 6.98 – add “and promote active travel” to the end of bullet point d.	Comment noted. Policy 20 gives priority to the needs of pedestrians and encourages walking, cycling and public transport use, which by definition promotes active travel.

Comment from	Refining Options section / policy	Comment	Council Response
GMPTE	Developer Contributions	GMPTE awaits the publication of the infrastructure planning study.	Comment noted.
GMPTE	Appendix 5 - Foxdenton Additional Information	Need to include greater reference to how the site's relatively poor public transport accessibility will be addressed.	Comment noted. Text added to Policy 14, which now includes further details on Foxdenton. See publication document.
GMPTE	Proposals Map	GMPTE refers to Foxdenton site and its accessibility issues.	Comment noted. Text added to Policy 14, which now includes further details on Foxdenton. See publication document.
GMPTE	General	<p>GMPTE have two comments regarding the "soundness" of the joint DPD:</p> <ul style="list-style-type: none"> • Proposals for future transport infrastructure improvements need to be founded on robust and credible evidence. • Foxdenton may fail the "test" unless there are improvements to public transport accessibility. 	Comment noted. The LDF is founded on robust and credible evidence. Text added to the joint DPD about the future transport infrastructure improvements to justify the proposals. Also the policy on Foxdenton has been strengthened to pick up public transport accessibility issues to justify the proposal. See publication document.
Coal Authority	Objectives	<p>Generally supportive of the joint DPD.</p> <p>The Coal Authority supports the strategic objective SO1 in relation to mineral safeguarding as being in line with the requirements of MPS1.</p>	Support noted.

Comment from	Refining Options section / policy	Comment	Council Response
Coal Authority	An Address of Choice and Promoting Sustainable Regeneration and Prosperity	It should be noted that much of the borough is underlain by surface coal resources. As such The Coal Authority considers that it is necessary to consider the potential sterilisation effect that development may have on the surface coal resources in order to be sound proposals in relation to the guidance set out in MPS1 and MPG3. The presence of surface coal resources need not prevent the council's development aspirations for the borough, as through appropriate consideration of the economic viability of potential prior extraction of suitable coal resources in a relevant site masterplan, the potential for prior extraction or not of the mineral can be determined in line with the advice in MPS1. To address this point The Coal Authority would suggest the following wording addition to the supporting text for these policies: "All development sites will only be taken forward following satisfaction of assessments in respect of flooding, highways, habitats, infrastructure, the potential sterilisation of minerals by the development and the potential or not for prior extraction of those mineral resources."	Comment noted. Text added to the joint DPD Policy 1 supporting text (to address the same points that the Coal Authority raised for policies 3 and 4). See publication document.
Coal Authority	Sustainable Use of Resources – Minerals	The Coal Authority broadly supports the thrust of the policy on minerals, which cross refers to the Joint Minerals DPD. This policy shows a clear commitment to safeguarding minerals and defining new sites and/or areas of search for mineral extraction in accordance with national policy. This includes a commitment to define Mineral Safeguarding Areas which in the view of The Coal Authority will need to be identified for all of the coal resource within the borough in accordance with the advice set out in MPS1, MPS1 Companion Guide, the BGS document and MPG3. This will be necessary to prevent the unnecessary sterilisation of a resource which has a defined clear role to play in future energy supply and the energy security of the UK. As the energy market is rapidly changing it is vital that appropriate safeguarding of energy minerals is undertaken to retain the flexibility required to respond to the future energy needs of the Country over the plan period. The Coal Authority considers that mineral safeguarding should be undertaken based upon the geological resource information available from the BGS and other public bodies such as The Coal Authority. It should then be undertaken in accordance with the policy advice set out in MPS1, the MPS1 Companion Guide and should follow the best practice guidance set out in the	Support noted.

Comment from	Refining Options section / policy	Comment	Council Response
		BGS document 'A Guide to Mineral Safeguarding'.	
Coal Authority	Energy	The Coal Authority welcomes and supports the addition of the wording in criterion i) in relation to mineral sterilisation in response to the comments made by The Coal Authority at the last consultation stage.	Support noted.
Natural England	Vision	Natural England welcomes reference to the Peak District National Park within the Vision, a nationally designated landscape, part of which lies within Oldham borough. The Vision also makes broad reference to sustainable development which we are supportive of. Within Section i of the Vision, Regionally Important Geological and geomorphological Sites (RIGS) should also be mentioned. The specific areas of European nature conservation importance could also be added for clarity (ie refer to Special Protection Areas and Special Areas of Conservation).	Comment noted. Text added to the joint DPD. See publication document.
Natural England	Climate Change and Sustainable Development	Whilst we are broadly supportive of paragraph L, we would welcome specific reference about the biodiversity value of brownfield sites. We recommend that the most environmentally sustainable locations are sought for development to ensure that brownfield sites of high environmental value are not lost. For example: "ensure development respects Oldham's natural, built and historic environments, Green Infrastructure, biodiversity (<i>including the environmental value of brownfield sites</i>), geodiversity and landscapes, and their settings."	Comment noted. Text added to the joint DPD. See publication document.
Natural England	Climate Change and Sustainable Development	We are supportive of the reference to the National Park within the supporting text to this policy.	Comment noted.
Natural England	Communities	This policy could more strongly make the links between health and the environment. We would like to see the Policy develop accessibility and the environment. Where the policy refers to: "development of new and improved health-related facilities. This will include the current LIFT health and well-being centres programme", we would also wish to see added: "and develop the	Comment noted.

Comment from	Refining Options section / policy	Comment	Council Response
		availability and accessibility of green infrastructure, and the walking, cycling and bridleway networks, to provide opportunities for people to lead a healthy and active outdoor lifestyle.”	
Natural England	An Address of Choice	The Policy makes reference to the sustainable housing market. We would also wish to see the policy cover the most efficient and sustainable use of land to direct development to the most sustainable locations.	Comment noted. The joint DPD needs to be read as a whole. Policy 1 picks up on these points already. In addition, Policy 3 also makes reference to “effective and efficient use of land”.
Natural England	Promoting Sustainable Regeneration and Prosperity	Overall we are generally supportive of policies which consider sustainable regeneration. We would like to see the sentence to read as follows: “Oldham will encourage and support <u>sustainable</u> , low carbon, economic regeneration, diversification, growth and prosperity.”	Comment noted. Text added to the joint DPD. See publication document.
Natural England	Promoting Accessibility and Sustainable Transport Choices	We broadly support Policy 5 which promotes sustainable transport.	Support noted.
Natural England	Green Infrastructure	We broadly support this policy, which appears to be thorough and locally specific. It would be appropriate to mention within the supporting text about the value of Green Infrastructure for health and wellbeing of people within the borough.	Support noted. Paragraph 5.63 (of the RO document) already refers to the health and well-being benefits of Green Infrastructure. Opening paragraph amended to highlight these issues.

Comment from	Refining Options section / policy	Comment	Council Response
Natural England	Local Environmental Quality and Amenity	Natural England suggests amending the policy along the lines of: "When allocating sites and determining planning applications, the council will protect, <u>conserve and where appropriate enhance</u> local environmental quality and amenity and promote community safety across the borough."	Comment noted. Text in the joint DPD amended to refer to "protect and improve". See publication document.
Natural England	Energy	Natural England commends the inclusion of a policy on renewable energy development. Natural England supports renewable energy and clean energy developments in appropriate locations. However, we feel that this policy should be more focused on working within the capacity of landscape/natural habitats in Oldham. It would appear that the policy could go further to seek to direct renewable development to the most sustainable locations. This would include consideration of landscape, biodiversity, geodiversity, access and recreation in the outdoors. The policy does mention biodiversity and peat for example, but does not go far enough (for example, "where the proposals are likely to result in an unacceptable impact the harm must be minimised through"). It is our view that there should be no net loss of biodiversity resource and that the aim should be to achieve enhancement in the quality and connectivity of the biodiversity resource. We would advise the planning authority to amend the policy to follow a sequential approach to conserving our most valued environmental assets by seeking first to avoid loss or harm before considering the need for mitigation, with compensatory measures only as a last resort.	Comment noted. Policy 21 deals with the issue of biodiversity.
Natural England	Water and Flooding	This policy is particularly limited in the way that it refers to water pollution (and this issue is not mentioned within Policy 9 either). Water pollution is referred to within section e, but this could be made more locally specific. It could also make reference in particular to run-off in the Rochdale Canal SSSI/SAC. The policy should aim to protect ground and surface waters from pollution and other effects of development. It could also further promote the protection, restoration and enhancement of river and canal corridors so as to conserve and enhance their natural environment and amenity value.	Comment noted. The LDF has to be read as a whole. The Environment Agency, which is the government agency that advises local authorities on water and flooding, is generally satisfied with the policy, subject to some minor technical clarifications.
Natural England	Design	Supports the policy.	Support noted.

Comment from	Refining Options section / policy	Comment	Council Response
Natural England	Protecting Natural Environmental Assets	<p>Suggests that the policy should be re-worded for greater clarity. The policy does not clearly set out the hierarchy for site protection at an international, national, regional or local level (nor mention specific designations - SACs, SPAs, Ramsar sites, SSSIs, Local sites (SBIs) etc). In terms of specific designations this could be made locally specific to Oldham, to make it a policy which is unique to the area (eg maybe mention some site names). The policy could also be better in setting out the hierarchical principles of conservation, enhancement, avoiding harm, then mitigation and compensation as a last resort (ie Key Principles of PPS9 – where granting planning permission would result in significant harm to biodiversity and geological conservation interest, local planning authorities will need to be satisfied that the development cannot reasonably be local on any alternative sites that would result in less or no harm). Conservation of biodiversity and geodiversity could also be covered more clearly. Geodiversity should be included within the policy alongside biodiversity in the first sentence. The second sentence, the wording should be changed to “protect, conserve and enhance”, to reflect the wording in the first sentence. There is no mention of Regionally Important Geological and geomorphological Sites (RIGS) within the policy and this should be addressed. The conservation of legally protected species seems to be muddled in with other issues, which is not helpful. It is our view that the wording of the supporting text could also be made less confusing, as well as policy. In particular bullet point b could be split up into more bullets to make the expectation of the policy clearer. For example:</p> <ul style="list-style-type: none"> • Protect, conserve and enhance biodiversity and geodiversity; • Protect, conserve and enhance designated sites; • Protect, conserve and enhance legally protected species and their habitats; • Separate section on local nature reserves, which could be Oldham specific listing LNRs within Oldham. <p>Such a policy should:</p> <ul style="list-style-type: none"> • Refer to internationally designated sites (SPA, SAC and Ramsar sites and indicate that development affecting them will be subject to special legal 	Comment noted. Policy 21 has been amended to reflect the key points raised. See publication document.

Comment from	Refining Options section / policy	Comment	Council Response
		<p>procedures in the Conservation (Natural Habitats &c) Regulations;</p> <ul style="list-style-type: none"> • Protect Sites of Special Scientific Interest, giving them a high degree of protection consistent with PPS9; • Indicate that development likely to have a significant adverse effect on regionally or locally designated sites including County Wildlife Sites (Sites of Biological Importance (SBIs)), and Regionally Important Geological and geomorphological Sites (RIGS) will only be permitted in exceptional circumstances, setting out the criteria that would justify such development; • Provide for the designation and management of more Local Nature Reserves by the Council; • Explain that permission will not be given until adequate surveys have been undertaken to establish the potential effects of development on protected species and the effectiveness of proposed mitigation measures; • Promote the creation, extension and better management of priority habitats identified in national and / or local Biodiversity Action Plans; • Include a policy encouraging the management of features of the landscape of major importance to wild flora and fauna which, because of their linear or continuous nature or their function as stepping stones, are essential for the migration, dispersal and genetic exchange of wild species; • Make explicit reference to geological conservation and to the need to conserve, interpret and manage geological sites and features in development areas. <p>With regards to the canals corridor part of the policy, this could also go further to set out the special SAC status of the canal and conservation requirements, and indicate that development affecting this site will be subject to special legal procedures. We consider it may appropriate to provide more detail with SPD to accompany this policy.</p>	

Comment from	Refining Options section / policy	Comment	Council Response
Natural England	Open Spaces and Sports	Natural England broadly supports this policy, but would welcome references to geodiversity in the first paragraph alongside biodiversity.	Comment noted.
Natural England	Open Spaces and Sports	Whilst there is reference to the biodiversity value of open spaces, there is no mention of the loss of biodiversity in situations where the open space would be lost. We would welcome its inclusion or cross referencing to the Green Infrastructure policy.	The joint DPD has to be read as a whole. Although cross-referencing of policies has generally been kept to a minimum, reference has been added a these two policies.
Natural England	Developer Contributions	Natural England welcomes references to securing Green Infrastructure through Developer Contributions.	Support noted.
Natural England	Habitats Regulations Assessment	Natural England expressed some views about how the HRA and the plan-making stage links to the planning application stage.	The HRA has been prepared on the council's behalf by the Greater Manchester Ecology Unit (GMEU). The GMEU has closely liaised with Natural England on the preparation of the HRA. Additional text has been prepared and agreed with the GMEU and has been added to the joint DPD main document. The amended HRA and text are appropriate to satisfy the HRA requirements. See publication document.
Oldham Council, Transport section	General	Has provided updated, factual information on transport, particularly in relation to Metrolink and local strategies	The joint DPD references have been updated.
Oldham Council, Environment	General	Has provided updated, factual information on environment matters, particularly low emissions.	The joint DPD references have been updated.

Comment from	Refining Options section / policy	Comment	Council Response
Policy section			
Oldham Council, Corporate Policy section	General	Has provided updated, factual information for the Spatial Portrait, particularly on the economy and population.	The joint DPD references have been updated.
Oldham TCP	Centres	Supports the policy approach towards food and drink uses, and the night time economy.	Support noted.
Purico	General	Indicated that comments would be submitted, but nothing received in writing.	Comment noted.
Jimmy Allen	General	Supports the joint DPD	Support noted.
Chorlton Planning (on behalf of 37 separate clients)	General	As with the Preferred Options document the Refining Options document is well set out, clearly referenced and easy to use. It provides factual information for 2009/2010 and the Council's vision of life in Oldham in 2026. It also looks at the regional and national context. However there is now some uncertainty about the form and content of the final LDF brought about by the Governments stated intension to abolish regional planning. Much of the information and many of the policies within the document refer back to the Regional Spatial Strategy (RSS).	Comment noted. References to RSS in the joint DPD have been edited. See publication document.
Chorlton Planning (on behalf of 37 separate clients)	Vision	This section looks forward to what sort of a place Oldham will be in 2026. It is clearly ambitious, but rightly so. However it is difficult to see how many of the aims and objectives that rely on government initiatives and funding can be achieved, especially in the current difficult economic climate with substantial cuts in funding for many of the projects expected. As referred to in our comments on the Preferred Options consultation the vision needs action to make it happen. We would strongly recommend that the LDF Plans, policies and vision are based on the need to encourage and make development happen. Development on the ground encourages a "feel good" factor and in turn attracts further investment. The vision and the Plan should be "development led" and consist of positive policies that encourage investment and innovation rather than the emphasis being on development control. The policies should, where appropriate, 'encourage' development and uses rather than just 'permit'. We fully support the	Comment noted.

Comment from	Refining Options section / policy	Comment	Council Response
		<p>concept of Oldham being a confident place, at ease with itself, by 2026. However to achieve this it must be economically active and attract a wide range of development, especially development that provide employment and quality facilities, including shopping and housing. It is the council that must take the lead in marketing the town rather than relying on others.</p> <p>We also support the reference in paragraph (d) to the support for tourism in its wider sense. There is however little reference to tourism within the policies. This is referred to later.</p> <p>We feel that the emphasis on maintaining the current green belt and retaining protected countryside land is too restrictive. Without RSS it is likely that Oldham can make its own decisions on green belt boundary. We would strongly recommend that the vision and policies allow for refinements of the green belt boundary, by including some land within it and releasing other land. Small but logical adjustments around the existing green belt will not only deal with anomalies such as Kiln Hill Close in Chadderton, which should not be in the green belt, but also allow acceptable developments on small areas of land that can be released without significant effect on the principal purpose of the green belt. It is accepted that large-scale green belt release may not be appropriate but an exercise to review the existing boundaries of the green belt can be carried out as part of the LDF review.</p> <p>In the 'borough wide' section the allocation of 289 new dwellings per annum is referred to. If RSS is abolished we would suggest that this figure is revised upwards. It is our view that Oldham has under performed in the provision of housing, especially private upper market housing, for a number of reasons. As referred to above house building needs to be encouraged to provide for local people and also attract families from outside. We welcome that housing will be focused in and around the built up areas and in rural settlements. Significant change in economic and social circumstances could take place over the fifteen years of the Plan and a strong element of flexibility should be included if the Plan</p>	<p>Tourism – reference has been added to Policy 4.</p> <p>Green Belt – no changes to the boundaries are proposed in the LDF.</p> <p>Housing distribution – the distribution of housing development across the borough is based upon the findings of our Strategic Housing Land Availability Assessment.</p>

Comment from	Refining Options section / policy	Comment	Council Response
		<p>is to retain its credibility over its lifetime. It is noted that some 60% of the dwellings to be built during the Plan period will be located in east and west Oldham with 10% in Royton, Shaw and Crompton, 10% in Failsworth and Hollinwood, 10% in Chadderton and 10% in Saddleworth and Lees. We question the 60/40% allocation between east/west Oldham and the remainder of the borough, and we do not feel that the four outer areas should be allocated an exact 10%. It is appreciated that whilst in theory these may present guidelines, it is our concern that these exact percentages may be used for monitoring and they will restrict development. A more flexible approach should be referred to with less emphasis on east/west Oldham and to the total numbers in each district.</p> <p>In the Royton, Shaw and Crompton section we do not accept that the entire area of land at Cowlshaw should be protected from development. Parts of this land could be developed without prejudice to the strategic function of the remainder of the area. Developments, especially in the area around Cowlshaw Farm itself could be beneficial to the residents of the area and would also help to fund open space and community facilities as part of a comprehensive development. The assertion that the large open countryside area at Cowlshaw will continue to be protected from development is not appropriate.</p> <p>In the Chadderton section we welcome the proposed mixed use of the Foxdenton site.</p> <p>In the Saddleworth and Lees section we welcome the reference to the rural economy being supported through appropriate land management, tourism and farm diversification. Tourism will be referred to later.</p> <p>The deficiency of outdoor sports facilities in Denshaw is noted. The lack of other facilities – e.g. post office, shops and the closure of some public houses, has been highlighted in the press recently. Additional population is required to support the wider range of facilities that are needed. To this end it is</p>	<p>Cowlshaw – the area will remain protected in the LDF.</p> <p>Foxdenton – Support noted.</p> <p>Tourism – reference has been added to Policy 4.</p> <p>Housing distribution – the</p>

Comment from	Refining Options section / policy	Comment	Council Response
		recommended that the Plan should allow for a significant expansion of Denshaw with the housing development financing new facilities for the village, including increased bus frequencies.	distribution of housing development across the borough is based upon the findings of our Strategic Housing Land Availability Assessment.
Chorlton Planning (on behalf of 37 separate clients)	Objectives	<p>SO2 - We support paragraph (b) which refers to the provision of sufficient housing to meet the needs and demands of the borough, including affordable, low cost and high value market housing. As referred to above we query the rather precise percentages of homes to be built in the districts of the borough – paragraph (f). More flexibility should be built into this. It is recommended that live/work units should be referred to in this section.</p> <p>SO4 - Refers to the maintenance of green belt boundaries. As referred to above these need to be reviewed.</p> <p><u>SO5</u></p> <p>Paragraph (i) refers to promoting the borough’s image to its residents and those living outside the borough. This is a key objective and needs to be given a higher profile. It is suggested that this should top the list rather than being at the bottom in this section. We strongly feel that the way forward is to encourage good quality development within the borough and to significantly raise its profile. This can only be done by development policies that <u>promote</u> development rather than those that seek to control and resist it.</p>	<p>Comments noted.</p> <p>Green Belt – no changes to the boundaries are proposed in the LDF.</p> <p>Comments noted.</p>
Chorlton Planning (on behalf of 37 separate	Tourism	Specific reference to “tourism” with the LDF is requested.	Comment noted. Reference to tourism has been added to Policy 4.

Comment from	Refining Options section / policy	Comment	Council Response
clients)			
Chorlton Planning (on behalf of 37 separate clients)	Climate Change and Sustainable Development	We support the policy with the exception of paragraph (k) which refers to the maintenance of the borough's green belt and locally designated Other Protected Open Land.	Support and comment noted. Green Belt – no changes to the boundaries are proposed in the LDF.
Chorlton Planning (on behalf of 37 separate clients)	Communities	Support the policy.	Support noted.
Chorlton Planning (on behalf of 37 separate clients)	An Address of Choice	<p>It is noted that the SHLAA annual monitoring report demonstrates that the borough could provide 428 dwellings per year net of clearance. However many of these sites are not in locations that would assist in providing a wide choice of dwellings, especially in the middle and upper market categories. It is noted that in Saddleworth the choice of sites is limited. This area in particular should be expected to provide its fair share of upper market houses to attract business and professional people to the borough. Again we would query the 10% allocation to the four outer districts of the borough. Concern that as part of the monitoring exercises these rather precise allocations may restrict development, especially the type of development that would attract people to the borough. The phasing policy should take account of the different geographical areas of Oldham and not be implemented on a blanket basis. This would also apply within sub-districts of the borough. For example it may be appropriate to release later phases in one area of the borough whilst land in earlier phases elsewhere still remains undeveloped. A number of allocated sites have remained undeveloped, for a variety of reasons, for a number of years. Unless the Council becomes actively involved in bringing forward these sites then they will remain undeveloped and prevent other developable sites from being released.</p> <p>The recent reclassification of private gardens in PPG3 needs to be considered.</p>	The distribution of housing development is based upon our Strategic Housing Land Availability Assessment.

Comment from	Refining Options section / policy	Comment	Council Response
		We welcome the reference to rural settlements (as opposed to the reference to villages). Many of these settlements could accommodate very limited development to allow for a variety of housing, including affordable housing and upper market family housing particularly in more suburban and rural areas.	Policy 11 deals with developments in residential gardens.
Chorlton Planning (on behalf of 37 separate clients)	Promoting Sustainable Regeneration and Prosperity	Support the policy in general terms.	Support noted.
Chorlton Planning (on behalf of 37 separate clients)	Promoting Accessibility and Sustainable Transport Choices	In general we support this policy. Public transport referred to in section A is noted. It is hoped that the distances referred to will be taken as guidelines rather than as absolute distances.	Support and comment noted. The policy refers to the thresholds as "approximately".
Chorlton Planning (on behalf of 37 separate clients)	Affordable Housing	We have no comments on this proposal. It appears to be within national guidelines and established practice that has development over the years.	Comment noted.
Chorlton Planning (on behalf of 37 separate clients)	Housing	<p>The general content of this section is welcomed in that a range of house types, tenures and locations should be provided across of the borough. Paragraph (c) relating to high value housing to retain and attract residents throughout the borough is welcomed. This will assist in raising the profile of the borough and its general image.</p> <p>With regard to paragraph (b) it is suggested that this be reworded in line with the reference to housing in the borough Wide section on page 7. It should read:- <i>"A mix of housing within Oldham town centre and Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill and rural settlements (such as the</i></p>	Support and comment noted. Reference to national density deleted.

Comment from	Refining Options section / policy	Comment	Council Response
		<p><i>Saddleworth villages).</i>”</p> <p>It is assumed that the minimum density referred to will now be deleted in view of the changes to national planning policy.</p> <p>It is recommended that live/work units should also be referred to in this section.</p> <p>The penultimate paragraph in the policy section relating to residential curtilage is welcomed. This presents a sensible approach to development within residential curtilages. It is accepted that this was written prior to the Government removing residential curtilage from within the definition of previously developed land. However, as referred to above, in view of the fact that residential curtilages helps to provide a range of housing in sustainable locations, it is hoped that they will not be automatically treated as greenfield sites. Residential curtilages are by definition within residential areas and have a domestic character rather than a true greenfield character. Each should be treated on its merits.</p>	
Chorlton Planning (on behalf of 37 separate clients)	Employment Areas	Supports the council's approach towards employment land, including the `arc of opportunity` and Hollinwood.	Support and comment noted.
Chorlton Planning (on behalf of 37 separate clients)	Supporting Oldham's Economy	<p>The content of this section is welcomed, in particular the development of the Hollinwood business district, Chadderton Technology Park and the Foxdenton area. However the language used in the policies is somewhat negative. It is recommended that development proposals for B1 and B2 uses should be 'encouraged' (rather than 'permitted'). There is a need to adopt an upbeat and positive approach to these areas and this should be reflected in the policies.</p> <p>With regard to the other BEA's and SEA's an addition should be made to the exceptions. A paragraph (d) is suggested which should say: <i>"The site is no longer suitable or appropriate for employment generating uses due to its adverse</i></p>	Comments noted.

Comment from	Refining Options section / policy	Comment	Council Response
		<p><i>effect on surrounding land and property due to the noise, pollution or traffic generated.”.</i></p> <p>The reference to live/work units is welcomed in section (e).</p>	
Chorlton Planning (on behalf of 37 separate clients)	Centres	<p>The policy appears to be in line with well established town and district centre policies. However the reference to prove `need` for a proposal in section (a) of the Food, Drink and Night Time economy related uses section is difficult to accept. Hot food takeaways, restaurants, cafes, pubs, wine bars, nightclubs, etc., tend to be located in distinct areas, which attract people from a wider area. It is difficult to see how `need` can be assessed in any meaningful way.</p> <p>It is not clear from the description to which centres this policy relates. The text refers to the town centre, the centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill acting as a focal point for commercial, shopping, social, civic, community and cultural activities. However later it refers to the boroughs <u>retail</u> hierarchy as including local shopping parades. Are these local shopping parades including within the definition of `centre` and do the uses referred to later also relate to these local shopping parades. For example what is the situation in Delph and Greenfield.</p>	<p>Comments noted. The policy on food and drink uses and the night-time economy has been included in the joint DPD as this is a major issue of concern to the council, its partners and the wider community. The policy explains that `need` will take account of the number of similar uses that are already within the area. Further guidance and advice will be provided after the joint DPD has been adopted. Policy 15 defines the borough's retail hierarchy, as required by national policy. However, paragraph 6.52 states that Policy 16 sets out the details of how proposals in local shopping parades will be assessed. Delph and Greenfield are not defined as `centres`. The text of the joint DPD has been amended to provide greater clarity about this policy. See publication document.</p>
Chorlton Planning (on behalf of 37 separate	Local Services and Facilities	<p>We support the intention behind the policy but feel that it is too prescriptive in terms of the uses and the retail frontages. The policy refers to local shops, leisure facilities, offices and other small-scale services of a local nature. It refers to post offices, pharmacies, advice centres, etc. These facilities would clearly be</p>	<p>Comments noted. Policy 15 deals with food and drink uses. Cross-reference has been added to the joint DPD to make this clear. The</p>

Comment from	Refining Options section / policy	Comment	Council Response
clients)		welcomed in any local centre or small parade of shops (minimum of three shops make a parade) but is it really realistic in today's economic climate to expect this level of shopping in town, district and in particular in neighbourhood shopping parades. Paragraph (a) refers to at least 75% of the frontage remaining in retail use. From experience we feel that this is likely to be quite unrealistic in many areas and that the operation of the terms of this policy will cause difficulties. In addition the policy does not address uses such as takeaways, restaurants, pubs or drinking establishments which are often located in town, district and neighbourhood shopping parades. In addition, the policy refers to the need to demonstrate that the shopping parade is not financially viable before a change of use that is not within these categories is considered. This could prove expensive and, at a local level, do not provide meaningful results. It is considered that this policy should be much more proactive in promoting development in district and local shopping parades.	thresholds for retail studies are set out in national guidance. See publication document.
Chorlton Planning (on behalf of 37 separate clients)	Gateways & Corridors	Support the policy.	Support noted.
Chorlton Planning (on behalf of 37 separate clients)	Water & Flooding	In general, support the policy.	Support noted.
Chorlton Planning (on behalf of 37 separate clients)	Design	In general the content of the policy is welcomed. However there is a danger that there is over emphasis on the design reflecting the character of the local area. Whilst this is true in most cases it should not stifle innovative, modern design that can create exciting new environments. This is particularly so in town and district centres and with community buildings and projects. Could reference to this be made somewhere in the policy or in the written text to encourage high quality innovative design that is appropriate for the area? Such design can give	Comments noted.

Comment from	Refining Options section / policy	Comment	Council Response
		an area a significant lift which can kick start its regeneration and improve the image of the town.	
Chorlton Planning (on behalf of 37 separate clients)	Protecting Natural Environmental Assets	In general we support this policy. However we have some concerns about the landscape character areas objectives. Whilst the protection and enhancement of the general landscape is to be welcomed the implementation of the policy must take into account the development needs of the area as well as landscape conservation.	Comment noted. The policy is based upon the findings of the council's landscape character assessment which was subject to public consultation in 2009 and was supported by organisations such as the National Trust.
Chorlton Planning (on behalf of 37 separate clients)	Protecting Open Land	<p>We have no concerns with the majority of open land within the borough being designated as green belt. We would however hope that PPG2 – Green Belts should be updated within the very near future to allow a more flexible approach to development within the green belt. We do not see any need for major sites to be released from the green belt but, as stated earlier, we feel that minor alterations to the boundaries of the green belt would allow a number of small and logical adjustments around existing settlements, to deal with anomalies. With the likely demise of RSS there is no reason why this minor review should not be dealt with as part of the LDF exercise. Similarly other protected land should be dealt with in the same way.</p> <p>With regard to other protected land we do not accept that all the sites referred to in paragraph 6.114 should be protected, in particular those at Ryefields Drive, Uppermill; Stoneswood, Delph; Stonesbreaks, Springhead and Thornley Brook, East Lees should not be included.</p>	Comments noted. There are no proposals to amend the Green Belt in the LDF. The OPOL sites will continue to be protected in the LDF.
Chorlton Planning (on behalf of 37 separate clients)	Historic Environment	In general we support the proposals. Again the introduction of appropriate, modern design within the historic environment or in association with listed buildings or buildings of local significance can be appropriate in certain circumstances. It is far better for a modern design to be used in association with or close to historic heritage assets rather than trying to replicate a design style of the past. A slight change of wording is suggested in "Other Designations". We would request: "Development which would affect the following designations will	Comments noted. The policy has been re-worded to reflect comments made by English Heritage.

Comment from	Refining Options section / policy	Comment	Council Response
		only be permitted if the building or structure is significantly enhanced. Demolition of the building or structure will only be permitted in cases where it can be demonstrated that the benefits of the development brings substantial benefit to the community which outweigh the preservation of the heritage asset.”	
Chorlton Planning (on behalf of 37 separate clients)	Developer Contributions	We have no major concerns regarding the policy.	Comment noted. .
The following comments were submitted by: GGRA. Dr & Mrs Shanker. Mark Dronsfield. Tony Howard. Anne Tunnicliffe.	General	Expressed concern about Uppermill being reclassified as a “District Centre”. Specifically, this will mean increasing permissible densities from 30 to 50 people per hectare with great implications for housing development and open space. Need to ensure the geographic boundaries of centres are strictly defined to protect the environment in surrounding areas. .	Comment noted. Text in the joint DPD amended to clearly state that any proposals in the borough’s centres must be of an appropriate scale and nature, and must not undermine the character, the role, the function or the vitality and viability of the borough’s centres. See publication document.
The following comments were submitted by: GGRA.		Urges that when Oldham Council conducts a balanced review of conservation areas to take account of all people’s interests.	Comment noted. Details passed across to the council’s Conservation Officer.

Comment from	Refining Options section / policy	Comment	Council Response
Dr & Mrs Shanker. Mark Dronsfield. Tony Howard. Anne Tunncliffe.			
Grains Bar Residents Association	Landscape	Supports references to the Landscape Character Assessment.	Comment noted.
Councillor Judge	Housing	Supports a policy to control developments in back gardens.	Comment noted. Policy 11 sets out the approach towards proposals for back gardens.
Councillor Hindle	Centres	Supports a policy to control food and drink uses and the night time economy.	Comment noted. Policy 15 sets out the approach towards food and drink uses, and picks up on the points raised in the representation.
United Utilities	General	We do not have any supply/demand issues in the Oldham area for water. For wastewater, we currently do not have any critical assets in the Oldham area. This does not necessarily mean that we could service development.	Comment noted.
Network Rail	General	Network Rail has no comments to make on the Refining Options document	Noted.
Diocese of Manchester	General	Wants the LDF to offer a flexible approach for redundant religious buildings being put to other uses to safeguard the long-term survival of an important or listed building	Comment noted. Policy 24 sets out the approach to dealing with heritage assets.
Marshall CDP	Employment	Supports BEA7 in the joint DPD.	Comment noted. See the proposed submission documents.
Dennis Brown	Landscape	Supports the Landscape Character Assessment in the joint DPD.	Comment noted. See the proposed submission documents.
JD Williams	Employment – Lilac Mill	Supports inclusion of JD Williams land within BEA9, but expresses concern about possible future uses of land outside the BEA. Suggests additional text for	Comment noted. The LDF has to be read as a whole. Policy 9 deals

Comment from	Refining Options section / policy	Comment	Council Response
		inclusion in the DPD about amenity impacts of neighbouring uses.	with amenity issues of future and existing neighbouring uses.
Countryside Properties	Employment	Supports the de-designation of the UDP PEZ 14 (Copster Hill) from the joint DPD.	Comment noted.
Countryside Properties	Employment	Supports the identification of Foxdenton in the joint DPD.	Comment noted.
Countryside Properties	Introduction	Para 2.11 – need to make clear that the 289 dwellings is an annual target.	Comment noted.
Countryside Properties	Vision	Clarify that Foxdenton is part-OPOL and part-LRFD in the UDP by adding Foxdenton to the list of LRFD sites.	Comment noted. See publication document.
Countryside Properties	Key Diagram	Supports identification of Foxdenton on the Key Diagram	Comment noted.
Countryside Properties	Promoting Sustainable Regeneration and Prosperity	Supports the commitment to the allocation at Foxdenton	Comment noted.
Countryside Properties	Employment Areas	Supports the commitment to the allocation at Foxdenton	Comment noted.
Countryside Properties	Supporting Oldham's Economy	Delete reference to “ancillary” before “residential”. Raise the assumed area of the site that could go for residential development from 25% of the site to 40%.	Ancillary deleted. The percentage has remained at 25%, further details will be worked out when the area is taken forward. See publication document.
National Grid Property Holdings Ltd	Energy	Supports the principle of measures to reduce carbon dioxide emissions and the aspiration to accelerate such moves in advance of new building regulations, however it is difficult to apply rigid targets and the policy needs to include reference that site specific circumstances will be taken into consideration when reviewing development proposals.	Comment noted. Policy amended in light of other comments to provide greater clarity. See publication document.
National Grid Property	Developer Contributions	Recommends a greater emphasis on the tests in the Circular within the policy wording itself, not just the supporting text.	Comment noted. See publication document.

Comment from	Refining Options section / policy	Comment	Council Response
Holdings Ltd			
Lord Mowbray's Estate	Introduction	Agrees with the summary of the main issues and key challenges.	Comment noted.
Lord Mowbray's Estate	Vision	Supports the Vision, particularly the references to Saddleworth and Lees. Welcomes to reference to housing choice and diversity, and the need for affordable, low cost and high value market housing.	Comment noted.
Lord Mowbray's Estate	Objectives	Supports SO2, but could have a greater focus on the need for choice of housing sites in terms of size and location in sustainable locations within the borough.	Comment noted. SO2 already makes reference to quality and choice in housing.
Lord Mowbray's Estate	Preferred Way Forward	General support, but still concerns about concentrations of new housing development within the Oldham Town Centre and regeneration areas.	Comment noted. The distribution of new housing is based upon our Strategic Housing Land Availability Assessment.
Lord Mowbray's Estate	Climate Change and Sustainable Development	It is considered that bullet points a and b take too simplistic a view to brownfield land being the most sustainable.	Comment noted.
Lord Mowbray's Estate	An Address of Choice	Welcomes references to choice and diversity. Flexibility in housing delivery is needed. Need to make greater acknowledgement of the role of greenfield sites in housing delivery.	Comment noted.
Lord Mowbray's Estate	Promoting Accessibility and Sustainable Transport Choices	Generally supports, but need to recognise that public transport accessibility is not the only factor in the choice of development sites. Criteria in the policy should not be applied rigidly.	Comment noted.
Lord Mowbray's Estate	Affordable Housing	Generally supports, but important to take account of viability of housing schemes. Particularly supports the inclusion of criteria c and d in the policy.	Comment noted. An Affordable Housing Economic Viability Assessment has been prepared which has informed the policy.

Comment from	Refining Options section / policy	Comment	Council Response
Lord Mowbray's Estate	Housing	Need to acknowledge the economic viability of the development and the requirements of the local housing market. Flexibility is essential.	Comment noted. An Affordable Housing Economic Viability Assessment has been prepared which has informed the joint DPD.
Lord Mowbray's Estate	Gateways and Corridors	Acknowledges the link between the delivery of the Lees New Road Extension and the development of the Knowles Land site, owned by Lord Mowbray's Estate.	Comment noted.
Lord Mowbray's Estate	Developer Contributions	Policy needs to recognise that in seeking developer contributions that the totality of any contributions sought should not undermine the viability of the development, and it discussions should take place on a case by case basis.	Comment noted. Policy 25 states that contributions will not be sought if there are issues around viability.
Quantum Services Ltd	General	Owner of 146-158 Huddersfield Road / Dunkerley Street, Oldham. Although the site is identified in the SHLAA with potential for 50 units, this could be increased to 100 units.	Comment noted.
Quantum Services Ltd	General	The redevelopment of the site at Dunkerley Road would contribute to regeneration.	Comment noted.
Quantum Services Ltd	Developer Contributions	Need to recognise commercial viability when seeking contributions, and supports the criteria about viability in the policy.	Comment noted. Policy 25 states that contributions will not be sought if there are issues around viability.
Quantum Services Ltd	Housing	Supports the effective use of land through focusing developments on brownfield land and the re-use of buildings.	Comment noted.
Quantum Services Ltd	Affordable Housing	Supports references to viability, and planning and regeneration objectives.	Comment noted.
Quantum Services Ltd	Promoting Accessibility and Sustainable Transport Choices	Supports development being guided to the most accessible locations, and promoting and encouraging use of buses, Metrolink, walking and cycling.	Comment noted.
Juan Murray	Key Diagram	Suggests showing canals in dark blue, not green. Clarify the red dots. No north arrow on the map.	Comment noted. Key Diagram has been amended to offer greater clarity. The Key Diagram is not on

Comment from	Refining Options section / policy	Comment	Council Response
			an OS base map, and a north arrow is not required.
Brian Lee	Vision	In paragraph K, need to make better mention of Lifelong Learning facilities.	Comment noted.
Urban Vision	Waste Management	Linkages box – clarify the reference to the GM Geological Unit to the work that the Unit is undertaking on AGMA’s behalf with the emerging joint waste plan.	Comment noted. The joint DPD amended along lines suggested. See publication document.
Urban Vision	Minerals	Clarify in the last sentence in the open paragraph that “regional requirements” apply to “aggregates” as there are no regional apportionments for other minerals types.	Comment noted. See publication document.
Urban Vision	Local Environment	A review of the joint DPD has been undertaken and it appears that all the topics that are necessary to link to the AGMA joint waste plan have been covered by the joint DPD.	Comment noted.
Heyford Developments Ltd	Vision	Supports the release of their site at Haven Lane from its UDP designation as Land Reserved for Future Development.	Comment noted.
Heyford Developments Ltd	Way Forward	Supports the council’s planning and development strategy.	Comment noted.
The following comments were submitted by: Peter Hodgson. Graham Parker.	General	Expressed concern about Uppermill being reclassified as a “District Centre”. Specifically, this will mean increasing permissible densities from 30 to 50 people per hectare with great implications for housing development and open space. Need to ensure the geographic boundaries of centres are strictly defined to protect the environment in surrounding areas. .	Comment noted. Text in the joint DPD amended to clearly state that any proposals in the borough’s centres must be of an appropriate scale and nature, and must not undermine the character, the role, the function or the vitality and viability of the borough’s centres. See publication document.
Oldham Town Centre Partnership	Centres	The Town Centre Partnership would like to make the following comments on Policy 15 – Centres.	Support noted.

Comment from	Refining Options section / policy	Comment	Council Response
		<p><u>Section titled 'Food, Drink and Night-time economy-related uses'</u></p> <p>The Town Centre Partnership welcomes the inclusion of this section in the Policy. It believes it provides a clear and appropriate set of criteria against which proposals for Food, Drink and Night Time Economy related uses will be assessed.</p> <p>The Partnership strongly supports the proposals to regulate these uses in order to prevent negative impacts on the economic vitality, safety, and environmental quality of the Town Centre.</p> <p>In particular, the Town Centre Partnership supports restrictions being placed on the opening of new hot food takeaways, which we identify to be already having a negative, cumulative impact on the Town Centre.</p> <p>Hot food takeaways are detrimentally affecting the Town Centre in terms of:</p> <ul style="list-style-type: none"> • Creating environmental problems like littering and odours • Detracting from the visual appearance of areas by often having non-active frontages during the daytime • Contributing to traffic flow problems as some patrons don't comply with parking restrictions outside premises • Contributing to alcohol-induced crime and disorder problems as part of the night-time economy as they are places where people under the influence of alcohol congregate <p>These detrimental effects have been compounded by the opening of a large number of take-aways and in concentrated areas, notably on Yorkshire Street and Union Street.</p> <p>The concentration of hot food takeways in these areas is also impacting on the variety of uses in areas, and in the case of Yorkshire Street and Union Street,</p>	

Comment from	Refining Options section / policy	Comment	Council Response
		their viability and identity as independent retailing areas which should make a very important contribution the overall vitality and diversity of the Town Centre	
Oldham Town Centre Partnership	General	The Town Centre Partnership feels that it should be referenced in this section under 'District Partnerships'. The Policy links to the work of the Town Centre Partnership as set out in its Town Centre Action Plan.	OTCP details added to the linkages boxes, as suggested. See publication document.

Table 2 Chorlton Planning submitted comments on behalf of the following clients:

J. Downs	Splash Properties
Mr. P. Ward	Indo African Exports Ltd
Mr. I. Corbett	Mr. and Mrs. A. Walker
Mr. D. Fisher, c/o Earthworks Environmental Design	Robert Scott & Sons
Mrs. A. Heathcote	Mr. R.M. Eglin
Mr. D. Hind	Mr. S. Cox
Mr. F Winterbottom	Dronsfield Mercedes
Mr. J. McLintock	S. Ingram
Mr. J. Jaskolka	John / Alwyn Lees
Mr. R. Cocking, c/o Roland Gaskell Chartered Surveyor	Mr. S. Howarth
Mr. P. Sykes	Mr. J. Ogden
Mr. G.F. Wood	Mr & Mrs P. Dobson
Mr. J. Fitton	Clough Manor Hotel
Quantum Star	White Hart Hotel
Mr. C. Taylor	Mr. B. Howarth
Mr. BH Tomlinson	Mr. R. Gledhill
Mr. C. Lees	Moorlands Caravan Park
Mrs. P. Lutener	Wellihole Farm Caravan Site
Mr. L. Perrins	

CHANGES MADE TO THE `REFINING OPTIONS` DOCUMENT

1.6 Following the Refining Options consultation which closed on 18 June 2010, and in light of recent announcements by the Coalition Government about changes to the planning system, such as the revocation of Regional Spatial Strategies, the following changes have been made to the joint DPD to produce the publication document. This document is a summary of the main changes. Please see the publication/submission document for the definite text.

General

1. Factual and information updates, for instance Metrolink, Buildings Schools for the Future (BSF) etc.
 2. References to RSS have been edited.
 3. References to "Manchester City Region" and the "city region" have been amended to "Greater Manchester" in most instances with the occasional reference to the "sub-region".
 4. References to the "regional centre" have been amended to "Manchester City Centre".
 5. References to "Leeds City Region" have been amended to "Leeds".
 6. References to "NWDA" have been edited.
 7. References to the "NWDA strategic regional sites" have been amended to "our neighbouring districts key sites".
 8. References to "Oldham Town Centre Partnership" have been added to the Linkages box at the end of each policy alongside the District Partnerships.
 9. References to "Refining Options" have been changed to the "joint DPD".
 10. Where appropriate and requested by the Highways Agency, added relevant text about the Highways Agency Protocol in to the policies linkages boxes.
 11. References to map changes to the adopted UDP proposals map have been updated where appropriate.
 12. Grammatical corrections have been made where necessary.
 13. Sources and references of documents have been added as footnotes to the document, where appropriate.
 14. This document is referred to as the `Proposed Submission` document, where appropriate.
 15. Footnotes added where reference to saved policies in the Unitary Development Plan.
16. **Introduction –**
- a. Paragraphs 2.6 to 2.10 of Refining Options have been removed as these were specific to the Refining Options consultation.
 - b. Paragraph 2.11 `ii` - added text to sentence "on average over the plan period".

- c. Appendix 2 of Refining Options – the Spatial Portrait – has been moved into the Introduction (in line with Planning Inspectorate advisory visit advice).
- d. Updated key assumptions to reflect recent Government announcements, re: RSS, BSF etc.

17. Spatial Portrait

- a. Factual information updated.
- b. Paragraph A2.14 of Refining Options - Added new sentence to end of paragraph that reads: “Sections of the Strategic Road Network experience peak traffic flows which can reduce journey time reliability. The challenge of addressing the additional trip generating developments will be essential to facilitating the Core Strategy. Table A defines the key issues which have been identified in partnership with the Highways Agency to ensure that the long term spatial plan can be realised without compromising the operation of the Strategic Road Network.”. (To address comments made by the Highways Agency.)
- c. Paragraph A2.17 of Refining Options – Statistics on the numbers of affordable homes provided updated.
- d. Paragraph A2.29 of Refining Options – deleted - due to current uncertainty about the future role of the previous government’s Growth Point programme.
- e. Paragraph A2.33 of Refining Options - Added new sentence to end of paragraph that reads: “Issue 4 of Table A acknowledges the air quality forecasts which have been modelled through the transport modelling assessment. The council and the Highways Agency will work together on the Site Allocations DPD in line with the Protocol (see paragraph 2.85-2.86 for further details).” (To address comments made by the Highways Agency.)
- f. Paragraph A2.49 of Refining Options – Amended to reflect the BSF announcement and to include details about the regional science centre: “...A Regional Science Centre (the Centre) is planned to be located at the recently developed Kings Point building in Oldham Town Centre. The Centre will comprise science laboratories, exhibition areas and lecture theatres. It would expect to take up to 1,600 visitors from schools a year, plus delivering to around 1,000 Further Education students and providing several hundred Higher Education proposed places. The Centre will host science enrichment activities for primary and secondary school students and also lectures from key scientists for students and businesses alike. Part of the centre may be used by the University of Huddersfield as part of the University Campus Oldham. However a large part of the Centre will be for the use of the Oldham Sixth Form College. The Sixth Form College aim to increase their student numbers from 2,300 to 2,500 by 2011, predominately through the expansion of their science department. It will open in 2011...”
- g. Paragraph A2.50 of Refining Options – Final sentence amended for greater clarity. New sentence added to end of paragraph that reads: “Specific measures will be investigated to address any potential increased impacts on the Strategic Road Network through area wide and more specific assessments in the Site Allocations DPD as defined in Table A”. (To address comments made by the Highways Agency.)

- h. The main issues and key challenges summary – amending bullet `vi.` to now read “Protecting people and property from flooding, and improving the quality of rivers and water”. Amend bullet point `xi.` by adding “Make Oldham an address of choice”. Amend bullet point `xxiii` by adding “and ensuring their prudent use and sustainable management.”
- i. Added in the summary details of the Key Issues from the now completed AGMA / Highways Agency Transport Protocol. Now paragraphs 2.86 and 2.87 and Table A of publication document. (To address comments made by the Highways Agency.)

18. Vision –

- a. Criterion `a` - “address climate change” amended to now read “adapt to and mitigate against climate change”. Also amended to read (new text underlined) “...We will require high quality design and sustainable construction of new development that will improve the quality of the borough, and reflect and enhance the positive character of the local area...”. (To address comments made by HMR.)
- b. Criterion `g` - Deleted “regional and national” from the reference to transport connectivity.
- c. Criterion `i` - Amended to read (new text underlined) “...regional importance (such as geological and geomorphological sites, RIGS)...”. (To address comments made by Natural England.)
- d. Boroughwide vision - Reference to Foxdenton being released for development added to list alongside other sites in final paragraph of boroughwide vision.
- e. Boroughwide vision - Amended to read (new text underlined) – “Sufficient land will be allocated to accommodate at least 289 new dwellings each year net of clearance on average across the LDF plan period.” (To reflect the abolition of RSS).
- f. Boroughwide vision – Amended references to reflect changes to the BSF programme. Seventh paragraph now reads “The transforming education agenda will be key to our university town aspirations. These will be supported by, amongst other things, the Building Schools for the Future programme, the Primary Capital programme for improving primary schools and the plans for the regional science centre in Oldham Town Centre.”
- g. Area visions - References to “current deficiencies” for open spaces amended to read “deficiencies”. (To address comments made by Sport England.)
- h. Area visions - References to Metrolink and BSF have been updated, where appropriate.

19. Objectives –

- a. Most unchanged other than editing references to RSS etc (from above).
- b. Objective SO1 `f` - Amended to read (new text underlined) “securing improvements to the public transport network and implementing the Metrolink extension proposals from Failsworth, to Hollinwood, to Oldham Town Centre and on to Shaw and beyond”. (To address comments made by GMPTE.)
- c. Objective SO3 `g` – reference to BSF removed.

20. The Way Forward –

- a. Edited along lines of Planning Inspectorate advice that the publication/submission document should set out details of the final planning and development strategy that we are going with, and not all the background material as to how we have arrived at that final strategy.
- b. Opening two paragraphs amended to reflect this is the publication/submission document rather than the Refining Options document.
- c. Appendix 3 paragraphs A3.25, A3.26, A3.28 and A3.30 of Refining Options moved into publication/submission main document for completeness.
- d. References to RSS etc (from above) edited.

21. Key Diagram –

- a. Amended to include our neighbouring districts' key sites (at Kingsway, Ashton Moss and Central Park). (To address comments made by GONW.)
- b. Minor presentation changes to the diagram to provide greater clarity.

22. Policy 1 - Climate Change and Sustainable Development

- a. Opening paragraph - Amended terminology from “address climate change” to “adapt to and mitigate against climate change”. (To address comments made by bodies such as Environment Agency, National Trust.)
- b. Criterion `c` - added “appropriate” before “major retail and leisure developments”.
- c. Criterion `e` – added text at end to read: “consistent with the Transport Protocol and specifically key issues 1 and 5 (Table A).” (To address comments made by the Highways Agency.)
- d. Criterion `k` - amended to read (new text underlined) “...biodiversity (including the environmental value of brownfield sites), geodiversity...”. (To address comments made by Natural England.)
- e. After paragraph 5.6 of Refining Options - added two new paragraphs about Greater Manchester Low Carbon Economic Area. “Greater Manchester was awarded Low Carbon Economic Area (LCEA) for the Built Environment in December 2009. The purpose of the LCEA is to accelerate growth in a particular part of the low carbon economy expanding on particular strengths, thus helping to strengthen and grow the UK's share of this market.” And “Greater Manchester's LCEA vision is that by 2015 Greater Manchester has established itself as a world leader in transforming to a low carbon economy. The physical retrofit and supply of energy to both the residential and non-residential building stock plays a key role in achieving this vision.”. (To address comments made by the council's Environmental Policy unit.)

- f. Paragraph 5.16 of Refining Options – text added “Particularly with regard to the site allocations which emerge through policies 11 and 13 and the relationship with policies 15 and 16.” (To address comments made by the Highways Agency.)
- g. Paragraph 5.21 of Refining Options – reference to the RSS and possible future Greater Manchester Green Belt review deleted.
- h. After existing paragraph 5.22 of Refining Options – Re-inserted text that was included at Preferred Options stage “All development sites will only be taken forward in the Site Allocations DPD following satisfaction of assessments in respect of flooding, highways, habitats, infrastructure, the potential sterilisation of minerals by the development and the potential or not for prior extraction of those mineral resources.”. (To address comments made by the Coal Authority.)

23. Policy 2 – Communities –

- a. Updated information on BSF schools.
- b. Paragraph 5.24 of Refining Options – Reference to source of community cohesion definitions updated for clarity.
- c. Paragraph 5.30 of Refining Options - replaced with updated text about BSF following Government’s announcement of 5/6 July 2010. The paragraph now reads “Building Schools for the Future (BSF) is a new approach to capital investment in school buildings and facilities. Proposals involve secondary schools being replaced, rebuilt or renovated. A review of the BSF programme by the Government, announced 6th July 2010, resulted in changes to some of the borough’s planned school development. Seven schools will be replaced by three new academies and a new Roman Catholic School. North Chadderton School and Sixth Form will be remodelled on the same site”.
- d. Table 4 of Refining Options – updated to reflect changes to the BSF programme.

24. Policy 3 – An Address of Choice

- a. Opening section – Added reference to “quality” alongside “choice and diversity”. (To address comments made by HMR.)
- b. Second section – opening first two sentences amended to read “The council will allocate sufficient land, in whole or as part of a mixed use scheme in the Site Allocations DPD, to accommodate at least 289 dwellings per year, net of clearance, on average over the LDF plan period up to 2026, informed by the findings of the SHLAA. At least 80% of the housing provision will be on previously developed land.” To reflect the abolition of RSS.
- c. Second section - Added reference to fact that UDP allocations which are not developed yet will be “saved” and reviewed as part of the Site Allocations DPD, to ensure consistency in the document.
- d. Paragraphs 5.34-5.36 of Refining options updated to read -

“Oldham will provide enough land for at least 289 new dwellings on average each year (after allowing for clearance). From 2003/04 to 2009/10, this meant that an extra 2,023 dwellings should have been completed in the borough. 3,074 new dwellings were built

during this period, although 1,502 existing dwellings were also cleared which means there was a net gain of 1,572 dwellings during the period. This is 451 dwellings fewer than the 2,023 dwellings that were expected to be built.

From 2010/11 to 2025/26 the borough will provide sufficient land for 4,624 new dwellings. It is assumed that clearance from 2010/11 to 2025/26 is 1,846 dwellings. Therefore, for the period 2010/11 to 2025/26, taking account of the annual need and the previous performance and future clearance, then the borough's housing land requirement is for 6,921 new dwellings. In addition to this, and in line with PPS3, it is also assumed that there will be a need to have a five year housing land supply at the end of the plan period (that is from 2025/26 to 2030/31). This means providing land for a further 1,445 new dwellings. Therefore, for the period 2010/11 to 2030/31, the LDF has to plan for sufficient land for 8,366 new dwellings.

The SHLAA (published as part of the December 2009 AMR) identifies a potential housing land supply of 10,937 dwellings as at 1 April 2010. The SHLAA, therefore, contains more dwellings compared to the level of housing provision required. To reflect abolition of RSS and updated figures.

- e. Table 6 of Refining Options deleted and replaced with the above text to reflect abolition of RSS and updated figures.
- f. Paragraph 5.38 of Refining Options – deleted “RSS sets out an indicative target of” from the brownfield target sentence.
- g. Paragraph 5.39 of Refining Options – deleted “such as future changes to our housing provision figures or to make an early contribution to Greater Manchester’s New Growth Point initiative” due to uncertainty over the future of this programme.
- h. After paragraph 5.40 of Refining Options – added new sentence “The 2006 UDP policies may be viewed on the council's website at www.oldham.gov.uk.”

25. Policy 4 – Promoting Sustainable Regeneration and Prosperity

- a. Opening section - Added reference to “sustainable”. (To address comments made by Natural England.)
- b. Second section - Added reference to “tourism” in sentence about rural diversification. (To address comments made by Chorlton Planning.)
- c. Second section – Added reference to “recreation” alongside “sports”. (To address comments made by Sport England.)
- d. Second section - Added reference to fact that UDP allocations that are not developed yet will be “saved” and reviewed as part of the Site Allocations DPD, to ensure consistency in the document.
- e. Second section - Amended second paragraph, to now read (new text underlined) “The council will allocate approximately 82 hectares of employment land in the Site Allocations DPD, for the period 2008 to 2026. Approximately half of this land will be provided at Foxdenton. The remainder will be focused on areas that are sustainable and accessible locations. The selection of development sites will have regard to a sequential approach, as set out in national guidance, based on Oldham Town Centre,

the centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill, the Hollinwood Business District, the Chadderton Technology Park and the other established employment areas (which are now titled either `Business and Employment Areas` or `Saddleworth Employment Areas`).")

- f. Second section New, third paragraph added - "Forecasting indicates that the borough may require additional office and retail floorspace during the plan period. The selection of development sites will follow a sequential approach as set out above. The majority of the floorspace will be located within, or on the edge of, our existing centres. New floorspace must be of an appropriate scale and nature and well-related to the character, role and function of the centre." (To address comments made by GONW.)
- g. After paragraph 5.47 of Refining Options – added new sentence "The 2006 UDP policies may be viewed on the council's website at www.oldham.gov.uk."

26. Policy 5 – Promoting Accessibility and Sustainable Transport Choices

- a. Opening section – Deleted "Integrated" from the reference to the "Greater Manchester Integrated Transport Strategy". (To address comments made by the council's transport section.)
- b. Criterion `b` - Amended to read (new text underlined) "promote Metrolink and its links with other means of travel, such as bus, walking and cycling, and encourage developments that are accessible to it." (To address comments by GMPTE.)
- c. Five new criteria added to the policy (at request of Highways Agency and/or GMPTE):
 - i. "reduce the need and distance travelled consistent with National Policy."
 - ii. "integrate development within a multimodal network, promoting connections and interchange facilities."
 - iii. "capitalise on the opportunities associated with Park and Ride sites."
 - iv. "deliver service enhancement of the public transport infrastructure which will be reviewed to assess the available capacity."
 - v. "promote and encourage infrastructure for modern modes of transport where appropriate."
- d. Parking standards – amended to reflect the fact that RSS has been abolished.
 - i. Criterion `f` - deleted as a criterion and re-worded as a new paragraph. Now reads (with new text underlined) "The council will apply parking standards to developments as a means to manage demand and encourage greater use of public transport, walking and cycling. In line with PPS4, the council will apply the maximum car parking standards set out in Annex D of Planning Policy Guidance Note 13: Transport (PPG 13) until locally-specific standards can be prepared after the joint DPD has been adopted. (See Appendix 11). Where an application is for a land use not covered in the national guidance, the council will determine the level of parking provision on an individual basis taking account of local circumstances. The council will have regard to, amongst other things, the nature and scale of the development,

- the character and setting of its location, the current and future levels of public transport accessibility and opportunities for walking and cycling in the area, the safety of road users and pedestrians, the need to reduce congestion and carbon emissions, and improve air quality.”
- ii. Paragraph 5.52 of Refining Options – deleted and replaced with new text to now read “After the joint DPD has been adopted the council will undertake an early review of car parking standards to create locally-specific standards. In setting local standards the council will have regard to the criteria included within PPS4 Policy EC8.”
 - e. Paragraph 5.50 of Refining Options – Final sentence updated to reflect the completion of the AGMA / Highways Agency Transport Protocol. (To address comments made by the Highways Agency.)
 - f. Paragraph 5.51 of Refining Options – Amended to update sentence about school travel plans. (To address comments made by the council’s transport section.)

27. Policy 6 – Green Infrastructure

- a. Opening section – Final sentence amended to read (new text underlined) “The council will identify, protect, conserve and enhance this multi-functional Green Infrastructure network in the borough and maximise the benefits associated with Green Infrastructure, such as health and climate change adaptation.” (To address comments made by Natural England.)
- b. Opening section – Added in reference to “North West River Basin Management Plan” to guidance list. (To address comments made by the Environment Agency.)
- c. Second section - Added in “where appropriate” to opening sentence. (To address comments made by NWDA.)
- d. Paragraph 5.53 of Refining Options – Added in reference to “Policy 6 links to and helps to deliver policies 21, 22 and 23”. (To address comments made by Sport England.)
- e. Paragraph 5.56 of Refining Options – amended reference to Hunt Lane, Chadderton recreational route to reflect the Foxdenton site.
- f. Paragraph 5.60 of Refining Options – New sentence added to now read “This policy applies to all open spaces, whether or not shown on the proposals map.” (To address comments made by Sport England.)
- g. Paragraph 5.64 of Refining Options – Amended text to read (new text underlined) “The Greater Manchester Green Infrastructure Framework sets out how Green Infrastructure can be enhanced across Greater Manchester. It identifies priority areas for conservation, enhancement and creation. The key diagrams highlight that Green Infrastructure investment is needed in town centres and major transport corridors, including Oldham Metrolink (Victoria to Hollinwood), to raise quality of public realm; as part of the regeneration of priority areas such as Oldham, including the Housing Market Renewal area and in economic centres (such as our neighbouring districts key sites including Kingsway, Ashton Moss and Central Park); in areas with below average health; and areas that should be conserved and managed or restored to address climate change. The key green infrastructure map illustrates the priorities to support growth. See Figure 6 in the spatial portrait. (To define ‘economic centres’).

28. Policy 7 – Waste

- a. Linkages box - Amended reference to “Greater Manchester Geological Unit” to the “Joint Waste DPD”. (To address comments made by Urban Vision.)
- b. Paragraph 5.76 of Refining Options – Amended reference to regional targets.

29. Policy 8 – Minerals

- a. Opening section - Amended policy references to regional apportionment. (To address comments made by Urban Vision.)
- b. Linkages box - Amended reference to “Greater Manchester Geological Unit” to the “Joint Minerals DPD”. (To address comments made by Urban Vision.)

30. Policy 9 – Local Environmental Quality and Amenity –

- a. Opening section - Final sentence amended to read (new text underlined) “When allocating sites and determining planning applications, the council will protect and improve local environmental quality and amenity and promote community safety across the borough.”
- b. Criteria `a` - added “and improve” to the opening sentence of the policy criteria.
- c. Criteria `a` iii` - amended the text about amenity to read “does not cause significant harm to the amenity of the occupants and future occupants of the development or to existing and future neighbouring occupants or users through impacts on privacy, safety and security, noise, pollution, the visual appearance of an area, access to daylight or other nuisances”. (For clarity and to address comments made by the National Trust and Turley Associates.)

31. Policy 10 – Affordable Housing

- a. Second section, second sentence text added (new text underlined) to read “The current target is for 7.5% of the total development sales value to go towards the delivery of affordable housing, unless it can be clearly demonstrated to the council's satisfaction that this is not viable.” To provide clarity.
- b. Paragraph 6.26 of Refining Options – deleted as it related to Preferred Options report and the findings of the AHEVA report, which have been incorporated into the policy.
- c. After Paragraph 6.27 of Refining Options – new text added (to address comments made by GONW):
 - i. “The 2006 UDP set out an approach towards the delivery of affordable homes based on the general presumption that for all allocated housing sites that 25% of the site capacity should take the form of dwellings which meet identified housing needs. The provision was secured through conditions or planning obligations to ensure the development was

- affordable in perpetuity. However, following the rise in house prices (before the credit crunch) this approach was no longer considered practicable as properties, even when discounted, remained unaffordable when re-sold and were therefore no longer affordable in perpetuity. In 2007, the council's Affordable Housing Strategy set out a formula for translating the UDP requirements into a percentage of the total development sales value, when dealing with a planning application, which is then used to deliver social rented housing. The formula produces a sum equivalent to 7.5% of the total development sales value. The LDF will continue with this approach that works for the borough."
- ii. "The council will work with partners and developers to secure affordable homes to meet the needs of the borough's diverse communities. The council's 2008 Housing Needs and Demands Study is being updated as the Oldham Strategic Housing Market Assessment (SHMA) and is due to be published in 2010. In determining the number of affordable homes that will be secured over the life of the LDF, the council and developers must have regard to the latest available information, including the Affordable Housing Strategy and the Oldham SHMA. This will ensure that the borough secures the right numbers and types of affordable homes. The number of affordable homes that will be secured will be dependent upon a number of factors. These will include, amongst other things, housing market conditions, the economic climate, the viability of development schemes within different areas of the borough, land values, remediation costs of development sites and the availability of public funding. In the Housing Market Renewal (HMR) area, the approach is that any developments funded through the HMR programme will be required to provide 30% affordable housing provision pepper potted, i.e. not concentrated in one area but mixed, singularly or in small clusters, throughout the development. During 2010/11 – 2011/12, the HMR programme is anticipated to deliver 90 affordable homes for rent or low cost purchase. Therefore, the number of affordable homes secured will, clearly, be dependent on the circumstances that prevail at the time of the development, and in negotiating on delivery the council will have regard to the 7.5% target to negotiate to pay for affordable housing provision on a site by site basis."
- iii. "The council will identify the anticipated number of affordable homes to be provided on the housing allocations in the Site Allocations DPD."

32. Policy 11 – Housing

- a. Second section – Amended opening sentence to now read "All residential development must be appropriate to the area, accessible to public transport and key services, and have regard to the council's plans for the area". (To address comments made by NWDA.)
- b. Edited out the reference to national density requirements in light of recent Government announcement.
- c. Criteria (f ii) - Added reference to "historic environment". (To address comments made by English Heritage and National Trust.)
- d. Criteria (f) – Added in new text to now read "consistent with Key Issue 5, Table A". (To address comments made by the Highways Agency.)

- e. Final section on back garden developments – amend paragraph to now read (new text underlined) “The Government changed the classification of gardens from ‘brownfield’ to ‘greenfield’ in June 2010. As stated in Policy 3, the use of previously developed land and vacant or underused buildings is the council’s first preference for residential development and the availability of such land, both in the locality and boroughwide, as assessed by the council’s monitoring arrangements, will be the first consideration when regarding applications on ‘greenfield’ sites. In addition, housing development within an existing residential curtilage shall not be permitted unless it can be demonstrated that the development: is acceptable in terms of design, scale, massing and density; is sensitive and compatible with local character; does not adversely affect the amenity of adjoining dwellings; is acceptable in access and parking arrangements. All residential development must provide adequate garden or other outside amenity space. (To reflect new Government policy.)
- f. Paragraph 6.29 of Refining Options – added new text after final sentence to read “In bringing forward the proposed housing developments (along with other development proposals) there are likely to be direct implications on aspects such as the transport network. Therefore the specific impact of housing sites on the transport network, both individually and cumulatively, will be assessed during the development of the Site Allocations DPD.” (To address comments made by the Highways Agency.)
- g. After paragraph 6.29 of Refining Options – added in new paragraph to read “Local evidence will include, amongst others, the Strategic Housing Land Availability Assessment and the Affordable Housing Economic Viability Assessment.” (To address comments made by HMR.)

33. Policy 12 – Gypsies and Travellers

- a. Opening section – Second paragraph amended to clarify that sites will only be identified in the Site Allocations DPD if there is a clear and demonstrable need based on up to date information.
- b. Paragraph 6.32 of Refining Options - Deleted as it relates to 4NW requirements.
- c. After paragraph 6.32 of Refining Options – new paragraph added to read “The council will identify pitches in the Site Allocations DPD only if there is a clear and demonstrable need based on up-to-date evidence.” (To address the abolition of RSS.)
- d. Paragraph 6.34 of Refining Options - Added in new text to read “Regard must be had to other policies in the joint DPD, for instance policies 1, 6, 21, 22 and 23.” (To address comments made by National Trust.)

34. Policy 13 – Employment Areas

- a. Opening section - Added in new text to read “A collective modelling exercise, defined in unison with the Protocol Key Issues outlined in Table A, will be facilitated to appraise the impacts of the Foxdenton site and the wider ‘arc of opportunity’. The council will provide further detail in partnership with key stakeholders, through the Site Allocations DPD. It is envisaged that the modelling work will review the impact on the Strategic Road Network and wider public transport requirements to enable sustainable growth”. (To address comments made by Highways Agency.)

- b. After paragraph 6.37 of Refining Options – added in new paragraph to read “In bringing forward the employment areas (along with other development proposals) there are likely to be direct implications on aspects such as the transport network. Therefore the specific impact of employment sites on the transport network, both individually and cumulatively, will be assessed during the development of the Sites Allocations DPD”. (To address comments made by Highways Agency.)

35. Policy 14 – Supporting Oldham’s Economy

- a. Second section - Amended first paragraph to now read “The uses permitted within the BEA's and the SEA's are listed below. Development proposals within these areas should be consistent with national and local guidance and policies. The selection of development sites will have regard to a sequential approach as set out in Policy 4.” (To strengthen the case for Oldham's approach to meeting our needs.)
- b. Second section - New, second paragraph added to read “Forecasting indicates that the borough may require an additional 30,000 square metres of office floorspace during the plan period, as shown in the Employment Land Review. The council will identify sites in the Site Allocations DPD. The majority of this may be located within, or on the edge of, our existing centres. Within the BEA's and SEA's, suitable offices should be of an appropriate scale and nature, and should not cause unacceptable harm to the character, role and function of the borough's centres.” (To strengthen the case for Oldham's approach to meeting our needs.)
- c. Foxdenton
 - i. List of employment areas re-ordered to include Foxdenton first to reflect its importance. (To address comments made by NWDA.)
 - ii. Introductory paragraph reworded to ensure the policy framework allows flexibility. To now read (amended text underlined) “The aim is to create a premium business location with opportunities for high-quality office, business and industrial developments in a pleasant environment that provides skilled jobs and contributes to Oldham's and Greater Manchester's economies. Development proposals for B1 (offices) and B2 (general industry) will be permitted and should form the focus for uses within the area. B8 (storage and distribution) will be permitted. Residential development on up to 25% of the site will be permitted. The council will provide further advice and guidance on this in the form of a masterplan.”
 - iii. Appendix 5 of Refining Options – Text added to the policy supporting text to strengthen the case for Foxdenton.
 - iv. Added in supporting text on the need to improve public transport accessibility as part of the development of Foxdenton. (To address comments made by the Highways Agency and GMPTE.)
- d. Hollinwood
 - i. Introductory paragraph reworded to ensure the policy framework allows flexibility. To now read (amended text underlined) “The vision for Hollinwood Business District is *“a new business-led district for Oldham - that meets*

Oldham's needs for good quality business space in an efficient and attractive environment to support a growing and productive local economy". Development proposals for B1 (offices) and B2 (general industry) will be permitted and should form the focus for the business district. In addition, the following uses will be permitted where appropriate: B8 (storage or distribution), A3 (restaurants and cafés), A4 (drinking establishments), A5 (hot food takeaway), C1 (hotels), leisure facilities up to 1,000 square metres gross floorspace and retail facilities up to 500 square metres gross floorspace."

- e. Chadderton Technology Park – B8 storage and distribution added to the list of uses to ensure the policy framework allows flexibility.
- f. Exceptions – Re-phrased opening paragraph to provide greater clarity, and added in new sentence to make clear this applies to all employment sites.
- g. Criteria `d, iv` – Added in new text to now read “contributions to new bus services and/or additional capacity on existing public transport routes, where appropriate, to support residents in travelling to employment locations;”. (To address comments made by the Highways Agency.)
- h. After paragraph 6.41 of Refining Options - New paragraph added to read “The employment land module of the Greater Manchester Forecasting Model (Reference Scenario, 2009) indicates that the borough may require an additional 30,000 square metres of office floorspace by 2026.” (To provide a reference to the evidence base and so strengthen the case for Oldham’s approach to meeting our needs.)
- i. Paragraph 6.49 of Refining Options – added in reference to masterplans and action plans for clarity.
- j. Paragraph 6.50 of Refining Options – deleted as the information in the appendix has now been included in the policy.

36. Policy 15 – Centres

- a. Second section - `Uses` heading – added new paragraph to read “Forecasting indicates that the borough may require additional retail floorspace during the plan period as shown in the 2009 Retail and Leisure Study. The council will identify sites in the Site Allocations DPD. The selection of development sites will have regard to a sequential approach as set out above. The majority of this will be located within, or on the edge of, our existing centres. Wherever located, suitable developments must be of an appropriate scale and nature, and must not cause unacceptable harm to the character, the role, the function or the vitality and viability of the borough’s centres”. (To address comments made by GONW.)
- b. Second section - `Primary Shopping Frontages` - added reference to the appendix with details of the frontages to read “Appendix 6 provides details of the primary shopping frontages.”.
- c. Second section - Added in sentence to end of policy to clarify that Policy 16 deals with local services and facilities.

- d. Second section – Two new final paragraphs added to ensure consistency in the document, to read “UDP policies TC1.1 and TC1.2 `Allocated Sites` are saved and will be assessed as part of the Site Allocations DPD.” And “The council will assess all the boundaries in the Site Allocations DPD.”
- e. Paragraph 6.53 of Refining Options – added new sentence to end of existing paragraph to read “The borough's centres may also act as a hub for transport.” (To address GMPTe comments.)
- f. After paragraph 6.56 of Refining Options - new supporting text added (to address comments made by GONW):
 - i. “In relation to convenience goods, the study concluded that there is no immediate need for additional floorspace if all existing commitments are implemented. In overall, boroughwide terms the study identified capacity for future convenience goods of some £41 million in 2013, increasing to more than £101 million by 2026. This is estimated at between approximately 8,000 to 18,500 square metres new floorspace. However, at the same time the existing commitments accounted for more than £66 million of this potential convenience goods turnover. Accordingly, all the identified capacity will be met until after 2018 by these commitments. By 2023, there is identified to be residual capacity of less than £16 million, increasing to almost £30 million by 2026. The study concluded that there appears to be no demonstrable capacity for major additional convenience goods floorspace in the short to medium-term (i.e. the introduction of a new foodstore) over and above outstanding commitments within the borough – assuming all commitments are implemented. In coming to this conclusion the study did recognise the role of local shops and that there may be scope to provide appropriate local convenience goods floorspace that would meet a specific local need and provide more sustainable shopping patterns and accessible facilities, however any such development should be appropriate in scale to the catchment it is intended to serve.”
 - ii. “In relation to comparison goods, the study also concluded that there is no immediate need for additional floorspace if all existing commitments are implemented. In overall, boroughwide terms the study identified capacity for future comparison goods of some £83 million in 2013, increasing to almost £300 million by 2026 if left unchecked. Should they all be implemented however, then outstanding commitments within the borough (most notably the redevelopment of Alexandra Retail Park) will absorb the identified capacity at least in the short-term (i.e. until after 2013). However, in the longer-term by 2026 even after taking into account outstanding commitments there is identified to be capacity of more than £26 million by 2016, almost £55 million by 2018, almost £115 million by 2023 and more than £183 million by 2026. This equates to a potential residual floorspace requirement of approximately 5,000 square metres (net) in 2016, increasing to approximately 10,000 square metres (net) in 2018, to approximately 18,000 square metres (net) by 2023 and to more than 28,000 square metres (net) by 2026, if left unchecked. The study further states that there is no certainty that all the outstanding commitments identified will be implemented, and that the council should closely monitor these future developments.”

- iii. “For comparison goods, the study identifies within the Oldham area (which cover Oldham Town Centre and the centres at Chadderton and `Hill Stores`) that there is potential capacity by 2018 for approximately 4,000 square metres floorspace, rising to approximately 12,000 square metres by 2023 and approximately 20,000 square metres by 2026 if left unchecked. The study further states that the focus for this growth should be Oldham Town Centre as there is limited scope in Chadderton given the strength and proximity of nearby provision, and that given the new Tesco Extra store at Hill Stores centre then there is considered to be limited scope to significantly improve the comparison goods offer of the centre in the short to medium-term. In Failsworth centre, the study shows potential for approximately 1,000 square metres floorspace in 2013 rising to approximately 2,300 square metres by 2026. In Royton centre, the study indicates potential capacity in 2013 of approximately 4,500 square metres rising to approximately 6,400 square metres by 2026, although the study further goes on to say that given the significant commitments nearby that will improve the comparison goods offer that the capacity is likely to reduce. In Shaw centre, the study also indicates potential for approximately 1,500 square metres in 2013 rising to approximately 3,500 square metres by 2026. For Uppermill centre and Lees centre, the study shows no significant growth potential. Uppermill serves an important role in meeting the day to day shopping needs of Saddleworth. Uppermill has a wide range of independents that makes for an attractive and interesting offer and experience, including its arts and crafts shops and library. It is an important visitor destination. The council will ensure that its distinctive identity and local character is maintained and enhanced.”
 - iv. “The Site Allocations DPD will identify the locations for new developments, having regard to the findings of the study (and any subsequent updates). The majority of any additional floorspace will, in the first instance, be located within our existing centres in accordance with the sequential approach set out in the policy. Proposals must be of a suitable and appropriate scale and nature to the centre, and must not cause unacceptable harm to the character, role and function or the vitality and viability of the borough’s centres. Failing that, edge-of centre sites should be considered next, with preference given to sites that are or will be well-connected to the centre. The council will assess the boundaries of the borough’s centres in the Site Allocations DPD.”
- f. After paragraph 6.59 of Refining Options – added new sentence “The 2006 UDP policies may be viewed on the council's website at www.oldham.gov.uk.”

37. Policy 16 – Local Services and facilities

- a. No specific policy changes, other than the general changes highlighted at outset above.
- b. Cross-reference added to Policy 15.

38. Policy 17 – Gateways and Corridors –

- a. Amended policy to reflect up-to-date information about Metrolink.
- b. Second section - Added in new text on Public Transport and the Strategic Road Network (to address comments made by the Highways Agency) to read:
 - i. “Public Transport - The council will deliver development whilst promoting and securing public transport investment by: understanding the dynamic interaction between all public transport services and walk/cycle movements; and liaison with GMPTE and interested parties to deliver services/capacity consistent with the requirement of the Site Allocations DPD; and securing funding from developers where investment in public transport is required to release sites identified within the Site Allocations DPD.”
 - ii. “Strategic Road Network –

“Given the findings of the Greater Manchester transport modelling, further investigation of issues on the Strategic Road Network associated with the proposed developments will be undertaken during the preparation of the Site Allocations DPD, consistent with the Protocol arrangements.”

“The additional demand will impact most evidently between Junctions 20 and Junction 22 of the M60. The M60 is a key part of the transport network, not only for Oldham but for Greater Manchester and as part of the network of national importance. It is therefore crucial that the performance of the Strategic Road Network is safeguarded in order that it can continue to provide this role and support the wider economic aspiration of Greater Manchester.”

“Further work will be considered as part of the Site Allocations DPD to understand and address any impacts on journey times, consistent with the Protocol and specifically key issues 2 and 3 (Table A).”
- c. Second section - Added in new text on School Travel to read “School Travel - “The council will support the Sustainable Modes of Travel (to school) Strategy, which includes proposals to improve existing infrastructure to facilitate more sustainable travel to school”. (To address comments made by the council’s transport section.)
- d. Paragraph 6.68 of Refining Options – First two sentences unchanged, remainder updated and separated into several additional paragraphs (to address comments made by GMPTE):
 - i. New paragraph 6.88 - “The re-opening of the remaining Standedge Tunnels and development of track between Diggle and Marsden have been identified as part of the preferred solution for resolving the `Manchester Hub` problem. The problem is identified in a Network Rail Study as the “most significant rail bottleneck in the North and so the most significant rail impediment to maximising economic growth. This is because it constrains the growth of rail commuter services, rail links between the North’s major cities and between the North and the South, rail links to Manchester

Airport and rail freight. The Study identifies two strategic options for addressing the challenges of the problem, both of which include the re-opening of the remaining Standedge Tunnels and development of track between Diggle and Marsden. The Study also identifies a number of `opportunities for service improvements` that would arise from adopting its preferred option `Option 2`. These include the potential for a new station and turnback facility at Diggle, which would facilitate additional services”.

- ii. New paragraph 6.89 – “The inclusion of the two schemes within the study highlights their importance to the borough as well as to Greater Manchester and the North.”
- iii. New paragraph 6.90 - “The Lees New Road extension is necessary to unlock an area of developable land at Knowles Lane. The provision of the highway link would be part of the development costs and would not bear upon public finances.”
- iv. New paragraph 6.91 – “Shaw and Crompton Park and Ride site is proposed as a scheme under the Greater Manchester Transport Fund and has been approved by the Greater Manchester Integrated Transport Authority and the Association of Greater Manchester Authorities. It is expected to add to the patronage of the Manchester – Oldham – Rochdale Metrolink line, which will open in Spring 2012”.

39. Policy 18 – Energy

- a. Second section – Amended third paragraph to now read (new text underlined) “All developments over 1,000 square metres or 10 dwellings and above (until such time that all development is required by the Code for Sustainable Homes (footnote -The Code was originally launched by DCLG in 2006. The Code includes any future requirements for non-domestic buildings – end footnote) to achieve zero carbon) are required to reduce energy emissions in line with the targets set out in Table 9. These targets are taken from the Greater Manchester Decentralised and Zero Carbon Energy Planning study. The target framework includes maximum and minimum targets. All targets are based on reductions over and above Part L of Building Regulations 2010 or 2013. The maximum target is based upon a sliding scale of costs and is location-specific depending on the cost and availability of solutions. An increase from the minimum target will only be expected if solutions cheaper than the base cost for the minimum target are available.” Remainder of paragraph now forms a separate paragraph. (To address comments made by HMR.)
- b. Amended table 9 of Refining Options (now table 8) headings to provide greater clarity. (To address comments made by HMR.)
- c. Green Energy Schemes – Amended criteria `viii` to now read “the visual amenity of the local area, including the sensitivity of local landscape character, through the number, scale, size and siting of renewable energy infrastructure, such as wind turbines, impact on the skyline, cumulative impact or the need for new power lines for connection to the supply grid;” (To address comments made by National Trust.)

- d. Amended `Target Selection Question 1` to refer to “Oldham Town Centre or in one of the borough’s other centres” to reflect abolition of RSS.
- e. Paragraph 6.69 of Refining Options – added text to the paragraph to highlight links to other LDF policies to now read “In applying the requirements of Policy 18 applicants must have regard to the other policies of the LDF, in particular policy 6 (Green Infrastructure), policy 21 (Protecting Natural Environmental Assets), policy 22 (Protecting Open Land) and policy 24 (Historic Environment).”. (To address comments made by Natural England.)
- f. Paragraph 6.74 of Refining Options – amended reference to targets in light of RSS abolition. To now read “The minimum target is based on the carbon reductions achievable from the least cost on site technology to achieve 15% contribution from renewable energy or a district heating network connection requirement.”.
- g. Paragraph 6.84 of Refining Options – text added to final sentence to read “Applicants proposing hydropower schemes should consult with the Environment Agency for guidance and advice.” (To address comments made by the Environment Agency.)

40. Policy 19 – Water and Flooding

- a. Opening section – “Rochdale Canal Strategy” added to list of policy documents.
- b. Second section – Fourth bullet point under the `Site-specific flood risk assessment` section – “where appropriate” added to 20 m of a bank top of a main river. (To address comments made by the Environment Agency.)
- c. Paragraph 6.89 of Refining Options – text amended to now read “The automatic right to connect surface water drains and sewers to the public sewerage system has been removed and developers are required to put Sustainable Drainage Systems (SuDS) in place in new developments wherever practical. Above ground SUDs options should be used, such as ponds, swales and green roofs, where feasible, rather than underground storage systems, which offer less biodiversity and landscape value.” (To address comments made by the Environment Agency.)

41. Policy 20 – Design

- a. After Paragraph 6.98 of Refining Options document – new sentence added to read “A statement will be required to show how development addresses the principles, including design character, where appropriate.” (To address comments made by English Heritage.)

42. Policy 21 – Protecting Natural Environmental Assets

- a. Opening section – First sentence amended as underlined – “New development and growth pressures must be balanced by protecting, conserving and enhancing our local natural environments, Green Infrastructure, biodiversity, geodiversity and landscapes to ensure a high quality of life is sustained.” (To address comments made by Natural England.)

- b. Opening section – add new second paragraph to read “When allocating sites and determining planning applications, the council will have regard to international, national (including Planning Policy Statement 9 ‘Biodiversity and Geological Conservation’, PPS9) and local guidance (including Policy 6 on Green Infrastructure and the findings of the Habitats Regulations Assessment, HRA)”. (To address comments made by Natural England.)
- c. Criteria ‘b’ - reworded as shown below (new text underlined). (To address comments made by Natural England):
- i. protect, conserve and enhance biodiversity and geodiversity, designated nature conservation sites, legally protected species and their habitats and Local Nature Reserves. The hierarchy for site protection is:
 - i. Special Protection Areas for Birds (SPAs) and Special Areas of Conservation (SAC);
 - ii. Sites of Special Scientific Interest (SSSIs);
 - iii. Sites of Biological Importance (SBI’s); and
 - iv. Local Nature Reserves and other non-designated sites containing substantive nature conservation value of local significance.
 - The council will ensure development does not have an adverse effect on the integrity of a European designated site on the basis of objective information. The council will work with Natural England and GMEU to assess proposals that may have an adverse effect on the integrity of the European site and where appropriate, ensure effective mitigation measures are put in place before permission is granted.
 - In exceptional circumstances where development is unavoidable and cannot be accommodated elsewhere:
 - v. the applicant must demonstrate the need for, and the over-riding public interest and benefits of, the development.
 - vi. the development must set out how the proposals will protect and enhance the nature conservation, including how any harm will be minimised effectively through design and mitigation measures.”
- d. Criteria ‘e’ - Amended to now read “protect and, where appropriate, enhance the aquatic environment, such as canal corridors, rivers and peat lands including their value as biodiversity resources. The council will support appropriate canal and river side regeneration, whilst ensuring development does not act as an obstacle to canal maintenance and its operations, navigation for leisure or freight purposes and public access to towpaths.” (To address comments made by the Environment Agency)
- e. Paragraph 6.100 of Refining Options – new text added to now read “Policy 21 links to and helps deliver Policy 6 ‘Green Infrastructure’.” (To address comments made by Natural England.)
- f. After 6.100 of Refining Options – new text added to read “The council will have regard to PPS9, including its key principles when allocating sites and determining planning applications. The council will seek to ensure that proposals avoid loss or harm to

- biodiversity resource before considering the need for mitigation and satisfactory compensatory measures.” (To address comments made by Natural England).
- g. Paragraph 6.102 of Refining Options– new text added to now read “The council will also protect any future Local Nature Reserves designated within the borough.” (To address comments made by Natural England.)
 - h. Paragraph 6.104 of Refining Options – new text added to now read “Proposals along key green infrastructure assets, wildlife corridors, designated sites or sites containing features of substantial nature conservation value should be accompanied by an appropriate ecological and/or geological assessment. The council will consult with Natural England on proposals affecting designated sites.” (To address comments made by the Environment Agency.)
 - i. After Paragraph 6.105 of Refining Options – New paragraphs added about HRA (To address comments made by Natural England.):
 - i. “Development proposals that are in close proximity to the Rochdale Canal should have regard to the findings of the HRA. Recent (last ten years) developments along the Rochdale Canal corridor have shown that it is possible to allow for relatively large-scale developments close to the Canal (and affecting the Canal directly) without causing significant harm to the special interests of the SAC, providing that appropriate precautions are taken. The Greater Manchester Ecology Unit (GMEU) would therefore consider it unreasonable (over-cautious) for the HRA to conclude that all development in areas of Oldham close to the Canal should be avoided. In reaching this conclusion the GMEU have considered the likely type of development that will be brought forward in these areas, (that is, development will not be related to potentially polluting heavy industries). The HRA has therefore concluded that, although development is proposed in areas relatively close to the Canal, providing that mitigating plans, policies and strategies are adopted and implemented appropriately through the development management process, in principle development areas planned for in the joint DPD can be allowed to go forward without harm being caused to the special interest of the Rochdale Canal SAC. This opinion is based on this Screening Opinion supplemented by the experience and knowledge of the GMEU in assessing the impacts of developments considered to have the potential to affect the special interest of the Canal.”
 - ii. “The HRA further recommended that any developments coming forward within the areas identified in the joint DPD as Foxdenton, Hollinwood, Chadderton Technology Park and Failsworth Centre be referred for Appropriate Assessment as part of the development management process so that appropriate mitigation for any damaging impacts can be properly planned and implemented. In addition, it further recommended that any further developments of the HRA of the Greater Manchester joint waste plan (JWDPD) and the joint minerals plan (JMDPD) be considered as part of this Assessment when available.”

43. Policy 22 – Protecting Open Land

- a. Supporting text amended to indicate that the current Green Belt boundaries will be maintained during the life of the LDF plan period to 2026 by deleting the reference to RSS and a possible future Greater Manchester review.
- b. Paragraph of Refining Options 6.114 – Added text to sentence for clarity to read “The following OPOL, which are unchanged from the 2006 UDP, will be protected”.
- c. Paragraph 6.116 of Refining Options – Sentence amended to provide clarity about the status of the Land Reserved for Future Development sites identified in the 2006 UDP that are not being carried forward in the LDF to now read “LRFD at Lancaster Sports Club (LR5), Warren Lane (LR6) and Haven Lane (LR7 and LR8) that were identified in the 2006 UDP will not be taken forward as LRFD in the LDF. These sites have potential for development and will be assessed.”
- d. in the Site Allocations DPD.
- e. After paragraph 6.116 of Refining Options – added new sentence “The 2006 UDP policies may be viewed on the council's website at www.oldham.gov.uk.”

44. Policy 23 – Open Spaces and Sports

- a. Policy – amended references to “Local Needs Assessment and Audit (LNAA)” to now read “Open Space Study” for clarity.
- b. Second section – criteria `c` - amended for clarity to now read “proposals relate to a masterplan, policy, programme, strategy or action plan approved by the council or Oldham Partnership”.
- c. Second section – criteria `g` - amended to now read “a replacement facility which is at least equivalent in terms of usefulness, attractiveness, quality and accessibility, and where appropriate quantity, to existing and future users is provided by the developer on another site prior to the development commencing;” (To address comments made by Sport England.)
- d. Paragraph 6.119 of Refining Options – For clarity, the percentage figures are now defined to one decimal place.
- e. After paragraph 6.121 of Refining Options – new paragraph added to read “The standards will be monitored and reviewed over the lifetime of the LDF. The council will have regard to relevant new and updated documents such as the Playing Pitch Strategy where appropriate. The council will provide further advice and guidance on this policy after the joint DPD has been adopted.” (To address comments made by Sport England.)

45. Policy 24 – Historic Environment

- a. Opening section – Reference to “Conservation Area Appraisals and Management Plans, where appropriate” added to list of guidance documents. (To address comments made by English Heritage Assessment.)
- b. Changed “historic” to “registered” in parks and gardens to reflect terminology.

- c. Opening section – final sentence – amended to now read “The council will support heritage-led regeneration, including the reuse of historic buildings such as mills, to achieve economic, community and regeneration objectives, where appropriate”. (To address comments made by HMR.)
- d. Second section – New text added to section on listed buildings to read “Proposals which would lead to the loss or cause harm to grade I and II* listed buildings should be wholly exceptional”. (To address comments made by English Heritage.)
- e. Conservation areas will now be shown on the proposals map, in light of advice from English Heritage.
- f. Second section - Moved reference to scheduled ancient monuments into a section on its own to now read “Scheduled Ancient Monuments - Development which would lead to the loss of, or cause harm to, scheduled ancient monuments should be wholly exceptional.” (To address comments made by English Heritage.)
- g. “Other designations” section title now changed to “local designations”.
- h. Paragraph 6.132 of Refining Options – new text added to criterion “iii) ...The policy applies to grade I, grade II* and grade II registered parks and gardens;” (To address comments made by English Heritage.)

46. Policy 25 – Developer Contributions

- a. Paragraph 6.134 of Refining Options amended to now read “...This may include, amongst other things, transport improvements, teaching facilities in schools, public realm improvements, health provision, green infrastructure, biodiversity enhancements and surface water management...”. (To address comments made by Environment Agency etc.)
- b. Amended reference to the tests in light of CIL guidance.
- c. After paragraph 6.134 of Refining Options – new para added to read “Access and transport contributions will take account of the DaSTS methodology which places an emphasis on capitalising on the existing network capacity before major capacity enhancements are considered. The hierarchical approach will explore and exhaust all alternatives before presenting major works on the Strategic Road Network.” (To address comments made by the Highways Agency.)
- d. Reference to monitoring indicators amended for clarity.

47. Appendices

- a. Appendix 1 of Refining Options - Monitoring Indicators - edited to reflect RSS abolition.
- b. Appendix 1 of Refining Options - Monitoring Indicators - Added new text to now read “We will use the indicators to measure the performance of the Transport Protocol Key Issues, where appropriate.” at end of table. (To address comments made by Highways Agency.)
- c. Appendix 1 of Refining Options - Monitoring Indicators – Indicator 43 amended to remove reference to BSF.

- d. Appendix 3 of Refining Options (now Appendix 2 of proposed submission document) – The Way Forward – Updated to reflect abolition of RSS and the preparation of the publication/submission document.
- e. Appendix 4 of Refining Options (now Appendix 3 of proposed submission document) – Energy Framework– Amended to reflect abolition of RSS. Target area definitions amended for greater clarity to address comments made by HMR.
- f. Appendix 5 of Refining Options – Foxdenton: Additional Information - text moved into Policy 14 to strengthen the case for Foxdenton.
- g. Appendix 6 of Refining Options (now Appendix 4 of proposed submission document) – Proposals Map Changes - updated to reflect the move from this being the Refining Option document to the publication/submission document.
- h. New Appendix 7 added – The UDP bulky goods schedule which has been `saved` added to the appendices.
- i. Appendix 9 of Refining Options (now Appendix 8 of proposed submission document) - Trajectories – updated with latest information available.
- j. New Appendix 9 added – Employment Land Take Up
- k. Appendix 10 of Refining Options (Appendix 10 of proposed submission document) – Status of UDP Policies – updated to address comments made by GONW.
- l. New Appendix 11 added – Parking Standards - to reflect abolition of RSS.
- m. Appendix 11 of Refining Options (now Appendix 12 of proposed submission document) – Glossary - updated to reflect abolition of RSS.
- n. Appendix 12 of Refining Options (now Appendix 13 of proposed submission document) - Abbreviations - updated to reflect abolition of RSS.