

Oldham

Local

Development

Framework

Background Paper - Economy

Part of Core Strategy and Development Management Policies
Development Plan Document

September 2010



Oldham
Council

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1 Introduction

What is the joint Core Strategy and Development Management Policies Development Plan Document?

1.1 The purpose of the Core Strategy Development Plan Document (DPD) is to set out the long-term vision and objectives for the borough. It will also contain a planning and development strategy, policies and a monitoring and implementation framework. The Development Management Policies DPD will set out policies that will manage development in the borough. Here in Oldham, the Core Strategy DPD and the Development Management Policies DPD will be prepared as a single document called the 'Joint Core Strategy and Development Management Policies Development Plan Document'. From this point on, it will be referred to simply as 'the joint DPD'.

About the background paper

1.2 This background paper forms part of the evidence base of the joint DPD in relation to the economy. It looks at national and local guidance and the evidence base for the economy, employment land, centres and retailing. It describes the formation of the following policies:

- a. Policy 4 Promoting Sustainable Regeneration and Prosperity
- b. Policy 13 Employment Areas
- c. Policy 14 Supporting Oldham's Economy
- d. Policy 15 Centres

1.3 The background paper provides a summary of the impact of these policies from each supporting assessment - Sustainability Appraisal (SA), Habitats Regulations Assessment (HRA) and Equalities Impact Assessment (EqIA). We have also set out how our approach towards the economy, employment land, centres and retailing will be delivered and monitored.

1.4 The background paper includes a section on Policy 1 'Climate Change and Sustainable Development' and Policy 25 'Developer Contributions' including how they are effective and justified in line with Planning Policy Statement 12 'Local Spatial Planning' (PPS12).

Main issues and key challenges

1.5 The main issues and key challenges in relation to the economy, employment land, centres and retailing are:

- a. Promoting economic prosperity, addressing worklessness, tackling economic deprivation and promoting economic well-being.
- b. Encouraging entrepreneurship and innovation.
- c. Providing enough employment land for new jobs and businesses.
- d. Maximising the potential of creative industries and the benefits that tourism and culture bring to the borough.
- e. Making sure that Oldham plays to its strengths and pulls its weight in Greater Manchester and develops its links with Leeds.
- f. Promoting the vitality and viability of Oldham Town Centre, the centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill, and local shopping parades.

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- g. Addressing the night-time economy, particularly in Oldham Town Centre.
 - h. Improving the quality of people's lives.
 - i. Adapting and mitigating to climate change and promoting sustainable development.
 - j. Securing energy conservation and efficiency and use of renewable energy, and low carbon developments.
 - k. Ensuring high quality design and sustainable construction of developments.
 - l. Promoting community cohesion.
 - m. Make Oldham an address of choice.
 - n. Improving education and skills levels. Facilitating the Oldham College, the Oldham Sixth Form College and University Campus Oldham developments.
 - o. Promoting accessibility and sustainable transport choices such as public transport, cycling and walking.

1.6 This background paper explains how we have addressed these issues through our joint DPD.

2 National

Employment Land Reviews: Guidance Note (ODPM, December 2004)

- 2.1** Guidance was published by ODPM to provide planning authorities with effective tools with which to assess the demand for and supply of land for employment. The guide provides specific advice to help planning authorities to identify an up to date and balanced portfolio of employment sites in Local Development Frameworks (LDF's).
- 2.2** The objectives of the guide are to help local planning authorities:
- a. assess the future demand for employment land;
 - b. assess the future supply of sites for employment;
 - c. assess the suitability of individual sites, whether existing, permitted or proposed for employment uses;
 - d. identify sites that are clearly unlikely to be required by the market or are now unsuitable for employment development;
 - e. develop appropriate future policies and proposals in Regional Spatial Strategies (RSS), but more particularly in LDF's;
 - f. improve systems for monitoring outcomes and reviewing employment policies and programmes. ⁽¹⁾
- 2.3** A single methodology is not being prescribed. Local authorities will need to adapt the advice to suit particular local circumstances.
- a. Stage One: Taking stock of the existing situation
 - b. Stage Two: Creating a picture of future requirements
 - c. Stage Three: Identifying a 'new' portfolio of sites
- 2.4** A description of the three stages can be found in Oldham's Employment Land Review.⁽²⁾

Planning Policy Statements

- 2.5** PPG 4 'Industrial and Commercial Development and Small Firms' and PPS 6 'Planning for Town Centres' were national policies in place at the time we started the joint DPD. Both were superseded by PPS 4 'Planning for Sustainable Economic Growth', in December 2009.

Former Planning Policy Guidance Note 4 'Industrial and Commercial Development and Small Firms' (PPG4) (DoE, 1992)

- 2.6** PPG4 deals with a number of issues regarding industrial and commercial development. It provides guidance on locational factors for development plans and states that they should offer the opportunity to:
- a. encourage new development in locations which minimise the length and number of trips, especially by motor vehicles;
 - b. encourage new development in locations that can be served by more energy efficient modes of transport (this is particularly important in the case of offices,

1 Employment Land Reviews: Guidance Note, page 1, paragraph 1.3, ODPM, 2004.

2 Pages 21 - 22, paragraphs 5.4 - 5.6, Oldham Council, 2010.

- light industrial development, and campus style developments such as science and business parks likely to have large numbers of employees);
- c. discourage new development where it would be likely to add unacceptably to congestion;
 - d. locate development requiring access mainly to local roads away from trunk roads, to avoid unnecessary congestion on roads designed for longer distance movement.⁽³⁾

Former Planning Policy Statement 6 'Planning for Town Centres' (PPS6) (ODPM, 2005)

2.7 The general thrust of national policy has been a 'centres first' approach. Its key aim is to promote the vitality and viability of 'centres' by planning for growth and development and encouraging a range of services. This was supported by the aims to improve consumer choice, competition, innovation, accessibility, regenerate deprived areas, and create jobs. This policy focus on 'centres' helps promote sustainable communities and tackle climate change.

Planning Policy Statement 4 'Planning for Sustainable Economic Growth' (PPS4) (DCLG, December 2009)

2.8 PPS4 sets out a suite of policies to promote economic growth, across a wide range of commercial activities, in both urban and rural locations.⁽⁴⁾

Planning Policy Statement 3 'Housing' (PPS3) (DCLG 2010)

2.9 PPS3 emphasises the need for housing developments to be focused on previously developed land. It also states local planning authorities should consider whether sites currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development.⁽⁵⁾

3 PPG4, page 2, paragraph 10, DoE, 1992.

4 PPS4, pages 2 - 4, paragraphs 4-10, DCLG, 2009.

5 PPS3, page 16, paragraph 44, DCLG, 2010.

3 Greater Manchester

Multi Area Agreement

The Manchester Multi Area Agreement Our City Region's Proposal to Government (MAA) (AGMA, 2008)

- 3.1** This is a unique set of proposals between Greater Manchester and partners in Government to create a new economic revolution worthy of the 21st century. There are eight Building Blocks within the MAA that are designed to bring significant gains in terms of Manchester's economic performance, contributing towards building safer, stronger and more prosperous communities. These are:
- The Greater Manchester Strategy which will set out AGMA Executive's overarching vision, objectives and core priorities for the future of Greater Manchester.⁽⁶⁾
 - Reducing Worklessness.⁽⁷⁾
 - Strengthening Our Skills Offer.⁽⁸⁾
 - Achieving more for 14-19 year olds.⁽⁹⁾
 - Accelerating Business Expansion to Generate Growth.⁽¹⁰⁾
 - Enhancing Investment and Innovation.⁽¹¹⁾
 - Ensuring Greater Manchester's Critical Infrastructure will sustain our economic growth.⁽¹²⁾
 - Meeting the Housing needs of a Competitive Greater Manchester.⁽¹³⁾

Greater Manchester Strategy

- 3.2** The Strategy aims to ensure that by 2020 Greater Manchester will have achieved a "new model for sustainable economic growth based around a more connected, talented and greener city region⁽¹⁴⁾ where the prosperity secured is enjoyed by the many and not the few".⁽¹⁵⁾
- 3.3** The Greater Manchester Spatial Framework is currently being prepared. As part of this work the following two studies are being undertaken:
- Large Employment Sites Study; and
 - Greater Manchester Town Centres Study.

Large Employment Sites Study (Housing and Planning Commission, Manchester's Commission for the New Economy, MIDAS and Jones Lang LaSalle, 2010)

- 3.4** The Housing and Planning Commission, Manchester's Commission for the New Economy and MIDAS, led by the Business Leadership Council, have commissioned a market-led study to evaluate the availability and suitability of large employment sites

6 Manchester MAA, pages 39 - 43, AGMA, 2008.

7 Manchester MAA, pages 45 - 51, AGMA, 2008.

8 Manchester MAA, pages 53 - 58, AGMA, 2008.

9 Manchester MAA, pages 59 - 63, AGMA, 2008.

10 Manchester MAA, pages 65 - 74, AGMA, 2008.

11 Manchester MAA, pages 75 - 80, AGMA, 2008.

12 Manchester MAA, pages 81 - 87, AGMA, 2008.

13 Manchester MAA, pages 89 - 93, AGMA, 2008.

14 Now referred to as Greater Manchester.

15 Prosperity for all: Greater Manchester Strategy, page 5, AGMA, 2009.

(i.e. sites greater than 15 acres) across the Greater Manchester. This is aimed at ensuring that Greater Manchester is able to meet predicted investor demand in the short, medium and longer term. Jones Lang LaSalle have been awarded the contract.

Greater Manchester Town Centres (GMTC) Study (New Economy, 2010)

3.5 The GMTC study is a 5 stage process:

- Stage 1 - Town centre evaluation
- Stage 2 - Market demand assets and policy impact
- Stage 3 - Findings and conclusions
- Stage 4 - Policy position statement
- Stage 5 - Town centre strategy/future 'prospectus'

3.6 Stages 1 to 4 of the GMTC Study have been completed and these stages have assessed the current economic function and the future economic potential of the principal town centres in Greater Manchester. By providing an economic health check, based on key economic, employment and property industry based indicators and complemented by a comprehensive programme of consultation - it has provided detailed evidence to demonstrate the important role that town centres have played in the economic development of Greater Manchester to date and the potential they have to contribute to future economic and employment growth.

3.7 The recently completed Stage 4 'Policy Position Statement' took this analysis further, examining the existing evidence and presenting a set of recommendations for town centres in respect of future policy guidance, direction and strategy. The recommendations identified the potential for the policy framework to support town centre development and the development of an intervention strategy that will ensure the town centres can contribute to future economic and employment growth.

3.8 The Stage 5 work will consider the following:

- "a quantitative analysis of town centre performance;
- a qualitative analysis of town centre performance;
- market testing of demand and appetite for investment in town centres;
- policy scenarios and outcomes;
- scope and nature of town centre potential;
- key barriers and constraints; and
- aims, principles and strategy proposals for town centres".⁽¹⁶⁾

16 Brief for Greater Manchester Town Centres Study – Stage 5 Market Demand Analysis and Town Centre Positioning.

Manchester Independent Economic Review

3.9 The MIER⁽¹⁷⁾ is a shared evidence base which can be used to underpin policy choices regarding future priorities for strategic investment. It is also intended to bridge some of the gulfs in understanding how regional economies grow. It is also an accessible and updateable evidence base at a more detailed level than has previously been achieved in order to support policy makers.

3.10 Seven reports have been completed as part of the MIER:

- a. **The Review (April 2009)** - this report developed 10 policy recommendations⁽¹⁸⁾ in summary these are;
 - i. a sustained effort to improve the very early years of all young people in Greater Manchester;
 - ii. a review of housing strategy;
 - iii. a review of transport planning;
 - iv. that planning policy should be reviewed to acknowledge the reality of economic demand and permit more expansion of suitable business premises in those parts of Greater Manchester where demand is strongest;
 - v. that Manchester moves as quickly as possible to a unified regime for planning, regeneration and neighbourhood renewal,
 - vi. that Manchester and national government partners undertake further detailed studies to identify whether there are potential government investments in science and elsewhere in the non-traded sector;
 - vii. that Greater Manchester looks again at how it makes major decisions;
 - viii. the development of a more effective system of programme and project evaluation is needed;
 - ix. that Manchester and central Government explore fully the evidence about the costs and benefits of, and the potential for delegation and devolution of some decision-making powers, including funding; and
 - x. in respect of trading links and skills that the response to MIER review should be led by the private sector.
- b. **The Case for Agglomeration Economies (April 2009)** - Headline findings from the report are that:
 - i. London and the South East are dominant, but for the long-term benefit of the UK economy, evidence suggests growth in Greater Manchester and other northern city's would be good.
 - ii. Greater Manchester is less productive than it should be due to skills, housing, planning and transport infrastructure.
 - iii. There is no evidence that clustering of specific industries improves productivity.
- c. **Innovation, Trade and Connectivity (April 2009)** - Headline findings from the report are that:

17 Manchester Independent Economic Review consisted of a Commission supported by a Policy Advisory Group and Secretariat. Organisations involved on the review included the North West Regional Development Agency, the National Endowment for Science, Technology and the Arts (NESTA), the Learning and Skills Council (LSC), Manchester Knowledge Capital, Manchester Enterprises, AGMA, and Investing in North West England. The reports can be viewed at www.manchester-review.org.uk.

18 The Review, pages 25 - 33, MIER, 2009.

- i. Large number of firms within Greater Manchester have no trading contacts within Greater Manchester but have strong connections to firms outside of Greater Manchester.
 - ii. The greatest capacity to spread innovations within Greater Manchester is found in the Financial and Professional Services sector, followed by Creative/Digital/New Media and ICT; there is the lowest capacity in Life Sciences.
 - iii. In conclusion the capacity of the whole north west's economy to innovate depends on links between firms within Greater Manchester.
- d. **Inward and Indigenous Investment (February 2009)** - Headline findings from the report are that:
- i. Investment by foreign firms in Manchester, in contrast to other parts of the UK, does not displace jobs and investment by domestic firms.
 - ii. Manchester is one of the best placed cities in the UK to match the economic strength of London and the Southeast.
 - iii. Large businesses within the north west are Manchester's main source of investment and productivity.
- e. **Labour Markets, Skills and Talent (March 2009)** - Headline findings from the report are that:
- i. Greater Manchester regularly out-performs its competitor cities with regards to offering high-skilled jobs and retaining and providing the talent required to fill those jobs.
 - ii. More of Greater Manchester's population are employed in the knowledge based industries of financial and business services, such as legal services, than ever before.
 - iii. The transformation of Greater Manchester's economy has wide-ranging implications for policy makers if Manchester is to continue to remain the dominant economic force outside of London and the South East.
- f. **Sustainable Communities (March 2009)** - Headline findings from the report are that:
- i. Levels of deprivation have fallen in all neighbourhoods across Greater Manchester.
 - ii. However some neighbourhoods have seen living standards improve at a faster rate than others.
 - iii. Policy development needs to take account of neighbourhoods, rather than focusing on borough or city-wide initiatives.
 - iv. The report establishes a new typology for categorising deprived neighbourhoods. These four categories (Isolate, Gentrifier, Escalator and Transit) each demonstrate different attributes which will shape the level and need for policy intervention.
- g. **Daresbury Campus Review (March 2009)** - This report looks specifically at the future of Daresbury and its potential as a centre for science.

Greater Manchester Studies/Research

Greater Manchester Forecasting Model

- 3.11** The Association of Greater Manchester Authorities (AGMA) has agreed to adopt a single economic and population forecasting model that focuses on the ten Greater Manchester authorities, in order to ensure consistency throughout Greater Manchester. The Greater Manchester Forecasting Model (GMFM) has been developed by the Oxford Economic Forecasting (OEF), and is a complex data tool that forecasts change in the future based on past trends. It provides economic, demographic, and housing forecasts.
- 3.12** The most recent forecast in relation to employee numbers in the borough made available by OEF at the time of writing this background paper were the Reference Scenario 2008 and the Reference Scenario 2009. ⁽¹⁹⁾
- a. **The Reference Scenario 2008** - this scenario was run in November 2008. The 2008 run differs from the 2007 run as for the 2008 scenario an expected recession for the Eurozone and the US is factored in.
 - b. **The Reference Scenario 2009** - this scenario was run in autumn 2009. It differs from the 2008 run as it expects a lower dip in the economy due to the recession, and a slower increase to growth than the 2008 GMFM (where the recession was only just beginning and expectations were more positive).

Greater Manchester Employment Land Position Statement (Nathaniel Lichfield and Partners (NLP) commissioned by AGMA August 2009)

- 3.13** The 'Greater Manchester Employment Land Position Statement' was commissioned by AGMA in May 2009 to update the employment land 'need' for the ten Greater Manchester local authorities.
- 3.14** The report looks at the concept of 'landless growth'. This refers to the creation of significant levels of B1/B2/B8 jobs on sites using a higher density than has been used in the past, building up rather than out. For Oldham, it states that landless growth has not been witnessed to a significant extent. However it goes on to conclude that due to developable land being relatively scarce in Oldham the redevelopment of brownfield sites at higher densities is a prerequisite if the borough is to achieve the goal of encouraging new high-technology industries.
- 3.15** The current supply of employment sites are also looked at. For Oldham, the statement says it is generally considered that the borough has a very limited supply of employment land due to environmental and physical restrictions, in particular topographical issues and the extent of Green Belt. It is noted that there are opportunities for Oldham's workforce to gain employment in neighbouring districts key sites such as Kingsway in Rochdale, Ashton Moss in Tameside, Central Park in Manchester, Manchester Piccadilly Basin/Oxford Road Area, and Salford Quays/ Irwell Corridor Area, as well as in Manchester City Centre.
- 3.16** The conclusions for Oldham suggested the need to plan for between 69 hectares and 133 hectares. This range was based on potential supply of land and the lower end of the draft ELR demand projections (the Final ELR had yet to be published at this stage). The statement says that the findings should be regarded as a starting point for further analysis and consideration.

19 Further information on the GMFM, including forecast employment changes can be found in Oldham Employment Land Review, pages 42 - 45, paragraphs 8.5 - 8.12, Oldham Council, 2010.

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- 3.17** The statement also provided a methodology for carrying out Employment Land Reviews to ensure a degree of consistency across Greater Manchester. In chapter 8 of the statement, NLP use the ODPM Guidance Note (summarised previously) as a starting point for deriving a common methodology for Greater Manchester authorities, although it is not rigid guidance and in particular there is a high degree of flexibility in the detail of the demand calculations which could remain specific to individual districts.⁽²⁰⁾
- 3.18** The report also highlights the importance of monitoring employment land across Greater Manchester.

20 More information on the broad methodology can be found in the Greater Manchester Employment Land Position Statement, pages 65 - 68, paragraphs 8.1 - 8.31, NLP, 2009.

4 Oldham

Sustainable Community Strategy and Local Area Agreement

4.1 Within the Sustainable Community Strategy, one of the themes is 'Economic Prosperity'. Its vision for the economy is,

"A thriving borough, playing a new and dynamic role in a world class Manchester City Region".⁽²¹⁾ To achieve this vision there is a need to improve employment opportunities for local people, enhance skills attainment and create an environment which encourages enterprise and investment".⁽²²⁾

4.2 To achieve the vision it states it will:

- encourage a restructuring of the local economy so that knowledge based growth sectors are more strongly represented;
- increase the proportion of the working age population which is economically active;
- continue to drive up the levels of educational attainment;
- transform the borough's secondary education facilities;
- raise the levels of skills;
- make major improvements to the borough's Further Education and Higher Education facilities;
- improve the quality of the offer of sites and premises for businesses;
- maximise the potential of Oldham Town Centre and the borough's other centres to capture growth sector economic activity;
- improve sustainable transport links between the borough and other key locations in Greater Manchester; and
- improve and maintain the transport infrastructure network.⁽²³⁾

Corporate Objectives

4.3 Oldham Council has four corporate objectives:⁽²⁴⁾

- A confident place - with safe neighbourhoods and clean, green spaces for all to enjoy
- A university town - with good education, learning and training to improve the skills and choices of our citizens
- An address of choice - a healthy and active place, with suitable housing for all
- Services of choice - quality services that provide value for citizens

4.4 The economic policies within the joint DPD link to the 'university town' objective. One of the ambitions is to build upon particularly outstanding recent improvements of the borough's students in maths and science. Both subjects are essential for the borough's ambitious plans for a new Regional Science Centre and will be crucial in moving Oldham towards a modern knowledge-based economy.

21 Now referred to as Greater Manchester.

22 Oldham's Community Strategy 2008-2020 and Local Area Agreement 2008-2011, page 12, Oldham Partnership, 2008.

23 Oldham's Community Strategy 2008-2020 and Local Area Agreement 2008-2011, page 115, Oldham Partnership, 2008.

24 Corporate Plan 2009 - 2013, page 6, Oldham Council, 2009.

- 4.5 Our ambition to be a university town is complemented by our plans for our major economic sites. We are working to build on the excellent foundation provided by a number of prestigious high value businesses in the borough to stimulate the growth of new high value technology businesses. This includes our plans for Foxdenton, Hollinwood Business District and Chadderton Technology Park as part of Oldham's M60 Employment Zone.

ORESAs

Oldham and Rochdale Prospectus Investing in Jobs, Homes and Communities (Oldham and Rochdale Economic and Skills Alliance (ORESAs), June 2009)

- 4.6 ORESAs is the Oldham and Rochdale Economic and Skills Alliance. The prospectus is the foundation of a single conversation with the Homes and Communities Agency and sets out the two boroughs' opportunities, achievements and challenges at the current time. The vision of the prospectus is:

"By 2020 Oldham and Rochdale will be thriving, playing a new and dynamic role in the world-class Manchester City region."⁽²⁵⁾

Renewed economic prosperity will be supported by our transformed housing markets, which will assist in creating sustainable, cohesive communities.

The boroughs will be great places to live for existing and new residents. Residents will enjoy higher income levels, quality local facilities and an excellent quality of life within our urban and rural areas".⁽²⁶⁾

- 4.7 The aim of the prospectus is to diversify and grow both the employment and the housing base so that a strengthened Oldham and Rochdale will improve the overall performance of Greater Manchester. It states that together the boroughs will play a supporting and complementary role as part of multi-centred Greater Manchester.

- 4.8 In relation to jobs the aim is to create a broad based, diversified economy with a higher Gross Value Added (GVA) per capita. There are a number of facts and figures included within the report in relation to the Oldham and Rochdale area, including:

- The area has a low productivity – GVA per capita – compared with Greater Manchester.
- The 'stock' of businesses is low – 480 businesses per 10,000 population compared with 600 nationally.
- The area has the oldest stock of business premises in the country.

- 4.9 The prospectus states that together these show the area does not currently have the property or land profile to meet the requirements of the modern economy. In relation to jobs the prospectus states that, "Oldham and Rochdale will need to maximise job opportunities linked with housing and regeneration programmes to benefit the local labour market and local businesses through supply chain opportunities and construction related employment".⁽²⁷⁾

25 Now referred to as Greater Manchester.

26 Oldham and Rochdale Prospectus Investing in Jobs, Homes and Communities, page 7, ORESAs, 2009.

27 Oldham and Rochdale Prospectus Investing in Jobs, Homes and Communities, page 26, ORESAs, 2009.

- 4.10** Hollinwood Business District, Broadway Business Park and the land at Foxdenton are described as Oldham's M60 Employment Zone of strategic importance. However the report also discusses the importance of identifying different types of sites to cater for different and specialist types of businesses. It states that these are likely to be located in good quality, local employment sites. Priority is given to local sites that relate closely to Housing Market Renewal areas, deliver services to growing centres and focus on key Metrolink stops.
- 4.11** The document also discusses issues surrounding housing, transport, communities, health and education.

Oldham Beyond

- 4.12** Oldham Beyond was commissioned by Oldham Local Strategic Partnership and published in 2004. It outlined a vision and a strategy for the renaissance of Oldham. The vision for Oldham in 15 years includes the aspiration that the borough will be "a generator of wealth". It goes on to say:
- 4.13** "The borough will be a good place to do business, where bold developments at Hollinwood and Mumps have created an attractive alternative to the sterile 'business parks' that characterise many towns, creating dramatic gateways to the borough. Oldham Town Centre will be a hotbed of creative and knowledge industries where talented people are attracted from elsewhere because of the convivial environment and affordable accommodation. The borough's 138 mills will have been refurbished for new business and illuminated as a potent symbol of the borough's transformation".⁽²⁸⁾
- 4.14** Ten key ideas⁽²⁹⁾ are included within Oldham Beyond, these are the ten main initiatives proposed to make a real difference to the borough. The ones that link directly to this economy paper are:
- a. New business - the promotion of two major new business locations, Hollinwood and Mumps
 - b. A creative borough - one of Oldham's strengths is creative people due to excellent courses at the boroughs colleges, preventing the loss of many of these people to Manchester is an important part of the strategy
 - c. The mills of Oldham - the strategy proposes the gradual transformation of the mills in the borough as many of them are underused. It goes on to say they should be converted over time to a combination of creative workspace and housing.

The Heart of Oldham – A masterplan for Oldham Town Centre

- 4.15** The Heart of Oldham is a demonstrator plan that shows the practical impact of the Oldham Beyond vision. It identifies the future potential of Oldham Town Centre.⁽³⁰⁾
- 4.16** 'Oldham Beyond: The Heart of Oldham' covers the whole of Oldham Town Centre and the surrounding area. It is particularly focused on the Economic Development Zones area which covers an arc taking in the southern fringes of the centre and running from Mumps in the east to Middleton Road in the west.

28 Oldham Beyond, page 4, Oldham Partnership, 2004.

29 Oldham Beyond, page 6, Oldham Partnership, 2004.

30 Oldham Beyond: The Heart of Oldham, Oldham Partnership, 2004.

Objectives include:

- a. To develop Oldham Town Centre as a place where communities feel welcome and at ease, where they express pride in the town and celebrate its success, where they shop, play, work and relax;
- b. To ensure that the town centre is easy to access by public transport, car and on foot and will be a pleasure to walk around on clean, safe and lively streets and public spaces;
- c. To promote a creative environment and ensure the town has a regional reputation for challenging art and architecture;
- d. To promote Oldham as a shopping destination of choice for people in the borough;
- e. To develop an educational quarter of the town centre that draws students from the local area and further afield, building an educated and skilled workforce;
- f. To ensure that the town centre comes alive in the evenings with a range of places for entertainment, eating and drinking;
- g. To develop Oldham as an aspirational place to live;
- h. To develop Oldham as a hotbed of talent and enterprise as well as a location where larger organisations can thrive and prosper.

Oldham Studies/Research

Oldham Employment Land Review (Oldham Council, 2010)

- 4.17** As part of the preparation of the LDF, Oldham Council has undertaken an Employment Land Review (ELR) to help create robust and informed employment land policies. The council is required to review the existing employment land allocations, forecast the need for new employment land over the plan period, and consider whether new employment allocations should be made and/or any existing sites de-allocated or carried forward.
- 4.18** In January 2007 Donaldsons were commissioned by the council to look at the ‘fitness for purpose’ of the current portfolio of available employment sites within the borough that are allocated in the Unitary Development Plan (UDP). 42.49 hectares of the 84.93 allocated land was found to be developed or under construction or unavailable for development leaving 42.44 hectares to be assessed as part of the Site Allocations DPD.
- 4.19** The next stage was to forecast the amount of employment land Oldham would require up to 2026. Four employment land projection and forecasting methods were used to ensure that a broad analysis of the potential employment land requirements within the borough has been explored.⁽³¹⁾
- 4.20** The overall conclusions of this stage was that Oldham, from 2008 to 2026, may need to provide 81.8 hectares of employment land.
- 4.21** The final element of the report aims to address any shortfall of employment land identified for the plan period. Six new sites were identified from looking into these sources. The conclusions of this stage were that all six sites be looked at further as part of the Site Allocations DPD but that it is essential that Foxdenton, as the largest site, is allocated for employment led development through the LDF. It went on to

31 Further details on the four methods can be found in Oldham Employment Land Review, page 42, paragraphs 8.3 - 8.4, Oldham Council, 2010.

conclude that if Foxdenton is not taken forward for employment development Oldham will have a potential deficit of employment land up to 2026 and will have to rely on Manchester City Centre and neighbouring districts key sites to provide opportunities for the workforce in the future, and/or rely on small sites which will not help with the borough's economic transformation.

Oldham Retail and Leisure Study (WYG Planning and Design and Oldham Council, 2009)

4.22 WYG Planning and Design retail consultants (WYG) prepared the Oldham Retail and Leisure Study (August 2009) in accordance with national planning guidance (which at the time was PPS6. The study includes:

- a. A review of the existing retail offer in the borough.
- b. A retail capacity assessment'
- c. 'Health checks' which assess the vitality and viability of Oldham Town Centre and the borough's seven other centres.

4.23 The headline messages to come from the study were:⁽³²⁾

- a. The existing retail hierarchy in the 2006 UDP is still valid.
- b. Commitments will generally meet all the need for additional convenience goods floorspace until after 2018.
- c. Commitments will generally meet all the need for additional comparison goods floorspace until after 2013.
- d. LDF should identify areas where retail & leisure development could be accommodated.
- e. Oldham Town Centre should be the main focus for major retail and leisure development. Oldham Town Centre should at least maintain, and if possible, improve its existing role by improving the quality as well as the quantity of its retail offer.
- f. Immediate need to improve the commercial leisure offer of the town centre.
- g. The council should generally resist further out-of-centre retail comparison floorspace in the borough.

4.24 The study did not define local centres or neighbourhood centres.

Oldham Economy and Enterprise Strategy and Action Plan (Oldham Partnership, 2006)

4.25 The strategy is directed by a clear vision statement:

"By 2017 Oldham will be thriving – playing a new and dynamic role in the economic growth of a world-class Manchester City region".⁽³³⁾⁽³⁴⁾

4.26 The aims of the strategy are:

"Enterprise

32 Oldham Retail and Leisure Study, executive summary, paragraphs 41-50, WYG, 2009.

33 Now referred to as Greater Manchester.

34 Oldham Economy and Enterprise Strategy and Action Plan, page 1, Oldham Partnership, 2006.

-
- To strengthen existing business and encourage investment.
 - To maintain high economic activity in the borough.

Skills

- To improve the skills of the local workforce to meet the needs of business and industry.
- To improve access to and the quality of employment opportunities.

Innovation

- To encourage sustainable economic regeneration.
- To support creation of new businesses and the growth of existing ones.
- To implement the wealth creation proposals of Oldham Beyond.
- To develop a tailored programme to support wealth-creation activities in the private and community sectors.

Investment

- To improve the image of of the borough as a destination for business and visitors.
- To conserve the best, as well as improve the quality, of the built environment.

Full Employment

- To assist people that are disengaged from the the labour market.
- To target areas where unemployment rates are concentrated".⁽³⁵⁾

5 The LDF so far...

ISSUES SURVEY (Oldham Council, 2007)

- 5.1** As part of the preparation of the joint DPD, we undertook, during March/April 2007, an issues survey as a first step in engaging with people in preparing the LDF. The survey asked 14 questions grouped around a range of broad themes (of safer and stronger communities; housing; economy and enterprise; children and young people; healthier communities; and environment) and two general questions.

ISSUES AND OPTIONS (Oldham Council, 2007)

- 5.2** During autumn/winter 2007 - 08, the council consulted on 'Issues and Options' of the joint DPD. This document set out:
- a. A spatial portrait – this set out key statistics and a description of key features that are distinctive to the borough
 - b. Key issues and challenges facing the borough
 - c. A vision for the future
 - d. A set of strategic objectives setting the future direction for the LDF
 - e. Three alternative options, or strategies, for directing future development
 - f. Topics that could be covered by core policies
 - g. Topics that could be covered by development management policies

PREFERRED OPTIONS (Oldham Council, 2009)

- 5.3** During spring 2009 we consulted on the 'Preferred Options' of the joint DPD. This stage built upon work undertaken during 'Issues and Options' stage, the comments received during that consultation and emerging evidence base.

- 5.4** The “Preferred Options” report set out:

- a. A spatial portrait
- b. A vision
- c. A set of objectives setting the future direction for the LDF
- d. The council's preferred strategy for directing future development
- e. Policy directions for a range of topics
- f. A monitoring and implementation framework

REFINING OPTIONS (Oldham Council, 2010)

- 5.5** During May and 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.

Main Issues and Key Challenges

- 5.6** The main issues and key challenges for the economy, employment land, centres and retailing are:
- a. Promoting economic prosperity, addressing worklessness, tackling economic deprivation and promoting economic well-being.
 - b. Encouraging entrepreneurship and innovation.
 - c. Providing enough employment land for new jobs and businesses.
 - d. Maximising the potential of creative industries and the benefits that tourism and culture bring to the borough.
 - e. Making sure that Oldham plays to its strengths and pulls its weight in Greater Manchester and develops its links with Leeds.
 - f. Promoting the vitality and viability of Oldham Town Centre, the centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill, and local shopping parades.
 - g. Addressing the night-time economy, particularly in Oldham Town Centre.
 - h. Improving the quality of people's lives.
 - i. Adapting and mitigating to climate change and promoting sustainable development.
 - j. Securing energy conservation and efficiency and use of renewable energy, and low carbon developments.
 - k. Ensuring high quality design and sustainable construction of developments.
 - l. Promoting community cohesion.
 - m. Make Oldham an address of choice.
 - n. Improving education and skills levels. Facilitating the Oldham College, the Oldham Sixth Form College and University Campus Oldham developments.
 - o. Promoting accessibility and sustainable transport choices such as public transport, cycling and walking.
- 5.7** This background paper explains how the council has addressed these issues through the joint DPD under the headings of employment land, Foxdenton and 'centres'.

6 Employment Land

ISSUES SURVEY (Oldham Council, 2007)

- 6.1** The initial issue that arose in the preparation of the Issues Survey was that developable land within Oldham is not an unlimited resource and with initiatives such as Housing Market Renewal there are many competing demands for land that need to be balanced. With this mind and following the guidance in ODPM's 'Employment Land Reviews: Guidance Note⁽³⁶⁾', the council in January 2007 commissioned consultants to assess the current portfolio of employment sites in the borough. When completed each employment site would be ranked in order of their suitability as an employment site and recommendations made as to their future. At the same time the council was also undertaking a review of Primary Employment Zones, again to assess their 'fitness for purpose'.
- 6.2** Bearing in mind the competing demands for land in the borough and government guidance on reviewing employment land, in the Issues Survey the questions we asked regarding to the economy centred around the future of existing employment land and the release of protected open land for employment development. The questions asked were:
- Do you agree or disagree that existing sites used for employment in the borough should be protected for future employment-generating uses only?
 - Do you agree or disagree that some existing protected open land - Green Belt, Safeguarded land, public open space – should be released for future employment development needs to meet the demand for inward investment and the creation of new jobs if these cannot be located on other sites?
- 6.3** The key findings in relation to the questions asked were as follows:
- There were mixed views on whether existing employment sites should continue to be protected for future employment-generating uses only.⁽³⁷⁾
 - Overall 74.4% disagreed or strongly disagreed that some existing protected open land - Green Belt, safeguarded land, public open space – should be released for future employment development needs.⁽³⁸⁾
- 6.4** Other key issues made in relation to the economy were:
- a. In addressing employment land requirements there is a need to consider opportunities to diversify the borough's economic base; and
 - b. Regeneration and maintenance of quality shopping and market areas.

ISSUES AND OPTIONS (Oldham Council, 2007)

Evidence Base

- 6.5** The relevant evidence base available at the time of 'Issues and Options' was:

36 Employment Land Reviews: Guidance Note, ODPM, 2004.

37 See page 13 of the Issues Survey: Analysis of Responses.

38 See page 14 of the Issues Survey: Analysis of Responses.

- a. Assessment of employment sites by consultants complete - highlighted that some sites may not have long term future as employment sites.
- b. Assessment of Primary Employment Zones (PEZ's) complete - highlighted that some PEZ's may not have a long term future as employment sites.
- c. Increasing pressure on employment sites to be developed for other uses, including housing and community uses, due to the fact that developable land in the borough is limited.
- d. Regional Economic Strategy in 2006 identified 25 key sites, three of which are close to Oldham's boundaries, Kingsway in Rochdale, Ashton Moss in Tameside and Central Park in Manchester.

6.6 The combination of the key sites being designated in neighbouring districts and the issues surrounding current and future employment land in Oldham led to questions in the 'Issues and Options' consultation document on the amount of land we should be allocating for employment uses, i.e. whether we should rely on neighbouring districts key sites to help meet our employment needs or not and around the future role of the borough's Primary Employment Zones.

6.7 A key issue for the borough that was apparent when pulling statistics together for the spatial portrait was the need to transform Oldham's economy. 'Issues and Options' highlighted that the borough had a lower average weekly wage and lower Gross Value Added per head than the regional and national average, although the percentage of people employed in manufacturing was higher than nationally.⁽³⁹⁾

Draft issues and challenges

6.8 The 'Issues and Challenges' section of the report discussed various topics, including the need for investment, the need to reduce poverty, the borough's employment land, the future of the borough's Primary Employment Zones, the potential for a series of key sites in the borough and the need to encourage a more entrepreneurial approach to business and to increase innovation in the borough'.⁽⁴⁰⁾

6.9 In relation to PEZ's the report stated, "Over the last two decades the approach to employment land has been largely driven by designating parts of the Borough as Primary Employment Zones (PEZs). These are available for commercial uses and are generally protected from non-employment uses. There are currently 32 PEZs of varying sizes and in various locations, from Hollinwood to Delph. Currently a wide range of uses are permitted within all PEZs".⁽⁴¹⁾

6.10 The uses permitted within PEZ's in the UDP are:

- a. "business uses (B1), with offices (B1 a) also subject to the locational criteria set out in policy B1.4 a.;
- b. general industry (B2);
- c. warehousing and distribution (B8);
- d. builders' and plumbers' merchants and yards, timber suppliers, plant hire depots, cash and carries and other outlets providing a service mainly to the trade;
- e. food and drink (A3);
- f. f.hotels (C1);

39 'Issues and Options', page 20, paragraph 5.2, Oldham Council, 2007.

40 'Issues and Options', pages 28 - 31, paragraphs 6.22 - 6.31, Oldham Council, 2007.

41 'Issues and Options', page 31, paragraphs 6.29, Oldham Council, 2007.

- g. the motor trade, including car and caravan showrooms, petrol filling stations and tyre and exhaust centres, and comparable uses related to canal navigation;
- h. waste management facilities;
- i. small scale retailing subject to the requirements of Policy S2.3 in the Retail and Leisure Development Chapter;
- j. small scale leisure facilities which for the purpose of this policy will be taken to include facilities with a gross floorspace of 500m² or less (D2); and
- k. nurseries and garden centres requiring large external storage and display areas".⁽⁴²⁾

6.11 The Issues and Options report went on to say, "Given the on-going regeneration of the borough, coupled with changes made to the PEZ policy through the UDP review which now permits housing in PEZs in certain circumstances, the future role and purpose of PEZs is an integral issue that has to be considered as part of this Core Strategy. It may be that the approach towards employment areas needs greater flexibility so as to allow for mixed-use development where it contributes to the renewal of existing buildings and infrastructure and better quality employment".⁽⁴³⁾

6.12 This section of the document received a couple of comments in relation to employment land. They were that new employment land, including PEZ's, should be in sustainable locations and that housing and the economy are intrinsically linked.⁽⁴⁴⁾ Also comments were made that some current PEZ's are poorly located and no longer suit the needs of modern businesses.⁽⁴⁵⁾ And a comment was made that employment land which is underutilised should be considered for alternative uses as this can generate capital to fund relocation to more suitable sites.⁽⁴⁶⁾

Draft vision

6.13 The suggested vision was: "A borough transformed to achieve greater community cohesion, economic growth and prosperity, and sustainable development, through regeneration activities and the rich diversity of its people and places".

6.14 In relation to the economy reference was made to a borough where, "its thriving innovation and knowledge-based economy, including the key strategic locations at Oldham Town Centre and Hollinwood, offers employment opportunities for local residents, as part of the wider Manchester City Region".⁽⁴⁷⁾⁽⁴⁸⁾

Draft strategic objectives

6.15 The Strategic Objectives in relation to the economy in the Issues and Options document were listed under SO3.⁽⁴⁹⁾ The overarching objective was to, "promote economic growth and prosperity and the sustainable economic regeneration of the borough". This was

42 Oldham Metropolitan Borough Unitary Development Plan, Policy B2.1, 2006.

43 'Issues and Options', page 31, paragraphs 6.29, Oldham Council, 2007.

44 'Issues and Options': Public Schedule of Representations and Responses, page 23, Oldham Council, 2008.

45 'Issues and Options': Public Schedule of Representations and Responses, page 28, Oldham Council, 2008.

46 'Issues and Options': Public Schedule of Representations and Responses, page 37, Oldham Council, 2008.

47 Now referred to as Greater Manchester.

48 'Issues and Options', pages 58, Oldham Council, 2007.

49 'Issues and Options', pages 59 and 60, Oldham Council, 2007.

to be achieved by a range of actions, including the provision of employment land, the encouragement of knowledge-based, innovative and creative industries, the implementation of the boroughs masterplans and promoting economic well being, reducing unemployment and social exclusion.

6.16 Comments received in relation to SO3 included that more safeguarded land would need to be released to meet employment needs⁽⁵⁰⁾ and other comments generally supported the objective.

Draft core policies

6.17 In relation to the Economy two core policies were proposed:

- CP5 Employment Land
- CP6 Local Economy

6.18 The Employment Land policy⁽⁵¹⁾ was described as including:

- how to address the borough's employment land requirements;
- how to address high technology uses, industrial and commercial uses, and office developments in the borough;
- how to address the approach towards Primary Employment Zones.

6.19 As a result of the consultation the only issue raised was that existing employment should not be protected for the sake of it and that the the urban environment could be upgraded through the residential redevelopment of those sites.⁽⁵²⁾

6.20 The Local Economy policy⁽⁵³⁾ was described as including the:

- spatial framework for promoting sustainable economic regeneration and improving economic prospects and performance of the borough.
- spatial framework for the borough's strategic locations.
- spatial framework for Knowledge-based Industries and Creative Industries.
- spatial framework for the borough's visitor economy.

6.21 No specific comments were made in relation to the Local Economy policy.

Draft development management policies

6.22 Development Control Policies (now known as Development Management policies) were also identified. The ones related to the economy were:

- DC6 Strategic Locations
- DC7 Economy

50 'Issues and Options': Public Schedule of Representations and Responses, page 48, Oldham Council, 2008.

51 'Issues and Options', page 72, Oldham Council, 2007.

52 'Issues and Options': Public Schedule of Representations and Responses, page 65, Oldham Council, 2008.

53 'Issues and Options', page 72, Oldham Council, 2007.

- 6.23** The Strategic Locations policy⁽⁵⁴⁾ was described in the document as providing specific details for the strategic sites in the borough, for example Oldham Town Centre, Hollinwood Business District, Chadderton Urban Technology Park.
- 6.24** The Economy policy⁽⁵⁵⁾ was described as providing specific details relating to the local economy that was not covered by the core policy. That is, new developments on existing employment sites and areas, changes of use etc.
- 6.25** No specific comments were made in relation to these policy areas.

PREFERRED OPTIONS (Oldham Council, 2009)

Evidence Base

- 6.26** The relevant evidence base available at the time of 'Preferred Options' was:
- a. Oldham's 'Draft Employment Land Review' had been out to consultation by 'Preferred Options' stage. One of the conclusions of report was that Oldham had a potential 'need' of approximately an additional 94 hectares.⁽⁵⁶⁾
 - b. As mentioned previously the review of the borough's Primary Employment Zones (PEZ's) had been completed by spring 2009. The conclusions of the review helped inform Policy Direction 15, 'Employment Areas', which provided information on the PEZ's that may be retained, amended or de-designated in the joint DPD.

Spatial Portrait

- 6.27** The spatial portrait in 'Preferred Options' updates the statistics from 'Issues and Options', where available. The same issues were present from 'Issues and Options': the borough's economy was under performing, unemployment higher than national averages, that the borough has a higher than average number of people employed in manufacturing compared with national figures and that business formation is low.⁽⁵⁷⁾ No specific comments relating to the economy section of the spatial portrait were raised.

Draft vision

- 6.28** The draft vision in 'Preferred Options' had an overarching element that related to the economy: "Oldham will be a borough transformed by economic diversification, growth and prosperity, regeneration, sustainable development and community cohesion".⁽⁵⁸⁾
- 6.29** It also had a further economic element, going on to say: "A borough of safer and stronger urban and rural communities - from Chadderton, Failsworth, Lees Oldham, Royton and Shaw to the Saddleworth villages - where its thriving low-carbon economy offers high-quality employment opportunities for local residents, based on high technology, innovation, knowledge and creative industries and environmental technologies, with a focus on the key strategic locations at Oldham Town Centre, Hollinwood Business District and Chadderton Technology Park".⁽⁵⁹⁾

54 'Issues and Options', page 77, Oldham Council, 2007.

55 'Issues and Options', page 77, Oldham Council, 2007.

56 Draft Employment Land Review, page 65, paragraph 9.12, Oldham Council, 2008.

57 'Preferred Options', pages 29 and 30, paragraphs 5.19 - 5.23, Oldham Council, 2009.

58 'Preferred Options', page 36, paragraph 6.1, Oldham Council, 2009.

59 'Preferred Options' document, page 36, paragraph 6.1, Oldham Council, 2009.

6.30 A response was received surrounding these elements of the vision from the Northwest Regional Development Agency who stated they supported the spatial vision that now refers to economic diversification as well as growth and prosperity.⁽⁶⁰⁾ 4NW expressed support for the economic elements of the vision.⁽⁶¹⁾

Draft strategic objectives

6.31 SO3 is the economic Strategic Objective and the overarching objective is to "promote economic diversification, growth and prosperity and the sustainable economic regeneration of the borough". The full objective can be found on page 37 and 38 of 'Preferred Options'

Preferred way forward

6.32 The preferred way forward proposed to promote economic diversification, growth and prosperity and sustainable economic regeneration.⁽⁶²⁾

Policy Directions

6.33 Policy directions were identified at this stage not the precise formal wording of the policies. The economy policy directions included were:

- Policy Direction 2 Regeneration
- Policy Direction 14 Promoting Economic Regeneration, Diversification, Growth and Prosperity
- Policy Direction 15 Employment Areas
- Policy Direction 16 Supporting the Local Economy

Policy Direction 2 Regeneration

6.34 This policy direction⁽⁶³⁾ identified strategic sites across the borough. Building on work carried out at Issues and Options stage, Policy Direction 2 included Hollinwood Business District, Chadderton Technology Park, Mumps and New West End as potential Strategic Sites. Due to emerging evidence base Foxdenton was also added as a potential Strategic Site.

6.35 For Hollinwood Business District, thirteen individual comments were received of which 77% supported the strategic site. There was additional support from 48% (that is, 10) of the Oldham College student focus group. Overall there was only one person who objected to the strategic site, the remainder tended to be of no firm view.

6.36 For Chadderton Technology Park, again thirteen individual comments were received of which 62% supported the strategic site and 15% did not. There was additional support from two-thirds (that is, 14) of the Oldham College student focus group.

60 'Preferred Options: Public schedule of comments and responses', page 30, Oldham Council 2009.

61 'Preferred Options: Public schedule of comments and responses', page 40, Oldham Council 2009.

62 'Preferred Options', page 40, paragraph 8.8, Oldham Council, 2009.

63 'Preferred Options', page 52, Oldham Council, 2009.

- 6.37** For Oldham Town Centre, nine individual comments were received. 78% supported the New West End strategic site and 67% supported the Mumps strategic site. Additionally, 76% of the Oldham College student focus group supported the proposed strategic sites. No one objected to either of the proposed strategic sites in the town centre.
- 6.38** The comments received in relation to Foxdenton are discussed in the 'Foxdenton' section of this background paper.
- 6.39** For a full summary of comments received in relation to Policy Direction 2 see 'Preferred Options': Public schedule of comments and responses', pages 86 - 92, Oldham Council, 2009.

Policy Direction 14 Promoting Economic Regeneration, Diversification, Growth and Prosperity

- 6.40** This policy direction⁽⁶⁴⁾ stated it may identify sufficient quality employment land. However although work had been completed on the borough's draft Employment Land Review concluding the borough had a potential 'need' of employment land of approximately an additional 94 hectares⁽⁶⁵⁾, as it was draft and still subject to consultation, the figure was not included within the 'Promoting Economic Regeneration, Diversification, Growth and Prosperity' policy direction. Instead the policy direction made reference to ensuring a 'sufficient range of quality employment land'.
- 6.41** The policy direction highlighted that the policy may recognise that part of Oldham's workforce may be employed by the neighbouring districts key sites. That is Kingsway in Rochdale, Ashton Moss in Tameside and Central Park in Manchester.
- 6.42** The main comments made in relation to Policy Direction 14 were generally supportive. 4NW stated that the diversification of Oldham's economy is a key issue for the joint DPD and that the approach in the policy direction were consistent with a number of RSS policies. A number of consultation responses welcomed a range of designated employment areas spread throughout the borough along with the de-designation of some existing PEZ's.
- 6.43** For a full summary of comments received in relation to Policy Direction 14 see 'Preferred Options': Public schedule of comments and responses', pages 183 - 189, Oldham Council, 2009.

Policy Direction 15 Employment Areas

- 6.44** This policy direction⁽⁶⁶⁾ outlined the proposed PEZ's for retention, de-designation and amendment. It also said the PEZ's may be re-named Business and Employment Areas (BEA's) and Saddleworth Employment Areas (SEA's). The policy direction also set out a list of uses that may be permitted within the retained BEA's and SEA's. The potential uses listed for BEA's and SEA's were:
- a. "B1 – Business.
 - b. B2 – General Industry.
 - c. B8 – Storage or Distribution.

64 'Preferred Options', page 81, Oldham Council, 2009.

65 Draft Employment Land Review, page 65, paragraph 9.12, Oldham Council, 2008.

66 'Preferred Options', page 83, Oldham Council, 2009.

- d. A3 – Restaurants and Cafes.
- e. A4 – Drinking Establishments.
- f. A5 – Hot Food Takeaway.
- g. C1 – Hotels.
- h. Small-scale leisure facilities up to 1,000 sqm gross floorspace.
- i. Small-scale retail facilities up to 500 sqm gross floorspace.
- j. Building and construction related uses.
- k. Transport and transport-related uses.
- l. Waste management facilities.
- m. Garden centres".⁽⁶⁷⁾

6.45 To allow for flexibility, the policy direction outlined circumstances where uses, other than those listed, may be permitted on employment sites. The criteria included marketing and viability assessments and also demonstrating that the development of the site for non employment use would benefit other regeneration, housing, education or community initiatives. This was included to ensure that the policy will not have a detrimental effect on initiatives important to the borough, including Housing Market Renewal.

6.46 Policy Direction 15 generated comments on a number of issues. NWDA questioned if the detail in the policy direction regarding employment areas was more suitable for a Site Allocations DPD. The council's response to this point was that the employment areas that are proposed for de-designation are key to the delivery of the LDF. For this reason the council felt it appropriate to identify employment areas within the joint DPD.

6.47 Housing Market Renewal (HMR) supported the de-designation of some PEZ's in principle, however in relation to the Borough Mill PEZ a view was expressed that de-designation may not support HMR objectives. The council's response was to flag up that Policy Direction 15 relates to designated employment areas and other employment sites. If Borough Mill PEZ were to be de-designated it would fall into the other employment sites category and there would still be a policy condition relating to regeneration schemes which would include HMR.

6.48 There were also a few site specific responses received with requests for employment areas to be de-designated. For a full summary of comments received in relation to Policy Direction 15 see 'Preferred Options': Public schedule of comments and responses', pages 189 - 211, Oldham Council, 2009.

Policy Direction 16 Supporting the Local Economy

6.49 This policy direction⁽⁶⁸⁾ set out how developer contributions may be used to outweigh the loss of business or industrial uses.

6.50 This policy direction had a number of responses in support of it, particularly the reference to live/work units.

6.51 HMR commented that it would be useful to understand the cost implications for schemes that have marginal viability or require public sector funding. Saddleworth Parish Council commented that the commuted sum approach should not be permitted and that benefits to the immediate community should be tangible and measurable.

67 'Preferred Options', page 84, Oldham Council, 2009.

68 'Preferred Options', page 85, Oldham Council, 2009.

6.52 For a full summary of comments received in relation to Policy Direction 15 see 'Preferred Options': Public schedule of comments and responses', pages 212 - 214, Oldham Council, 2009.

REFINING OPTIONS (Oldham Council, 2010)

Evidence Base

6.53 The relevant evidence base available at the time of 'Refining Options' was:

6.54 A number studies were completed in relation to the economy in time for the 'Refining Options' consultation.

- a. In May 2009 NLP were commissioned by AGMA to produce 'The Greater Manchester Employment Land Position Statement'. As mentioned previously the conclusions for Oldham, due to a number of reasons, was that it was considered inappropriate to plan for excessive need based on past take up rates, so a range of demand projections were suggested of between 69 hectares and 133 hectares.
- b. The Final ELR was approved in March 2010 and identified an employment land requirement for Oldham and began to address any potential shortfall in employment land the borough may have. The conclusions based on the most up to date information available, in relation to potential employment land 'need' was for at least 81.8 hectares up to 2026. This falls within the range identified for Oldham in the Greater Manchester study.
- c. The Final ELR went a stage further than the Draft ELR, and attempted to identify sites that may have the potential to meet the employment land 'need'. It concluded that land at Foxdenton is crucial if Oldham is to achieve its employment land requirement. It goes on to say that if land at Foxdenton is not taken forward as an employment site than Oldham will have difficulty in finding any alternative large sites and may have to rely on neighbouring authorities to provide employment sites for the workforce in the future.
- d. In June 2009 the Oldham and Rochdale Prospectus 'Investing in Jobs, Homes and Communities' by ORESA was published. It further supported the inclusion of Foxdenton as an employment site as it described the area, along with Hollinwood and Broadway Business Park, as forming Oldham's M60 Employment Zone.

Visit from the Planning Inspectorate

6.55 In January 2010 the council received a 'Frontloading' visit from the Planning Inspectorate to consider work undertaken so far in preparation of the joint DPD. The Inspector read the council's draft policies and provided feedback and guidance where appropriate. In relation to the draft economy policies the Inspector commented that the policy in the joint DPD should outline in principle where the borough's employment areas will be located, with the specific site work coming as part of the Site Allocations DPD. These comments were fed in to the 'Refining Options' document, which outlines the broad locations (known as Business and Employment Areas and Saddleworth Employment Areas).

Vision

6.56 The vision in 'Refining Options' opens with, "Oldham will be a borough transformed by economic diversification, growth and prosperity, regeneration, sustainable development and community cohesion that respects our local natural, built and historic environments"⁽⁶⁹⁾ The economic bullet point in the vision states that Oldham will:

"promote a low carbon economy that benefits from the new and emerging industries to offer jobs for local people, so reducing worklessness and deprivation levels. We will provide employment land for our businesses locally that is suitable for the 21st century, whilst at the same time recognising the role the regional centre⁽⁷⁰⁾ and the strategic regional sites⁽⁷¹⁾ play in the borough's economy. We support our rural economy and recognise its particular characteristics and challenges including the need for employment sites, appropriate land management and farm diversification. We support tourism in its widest sense".

6.57 The full vision can be viewed on pages 6 - 10 of the 'Refining Options' document.

Strategic Objectives

6.58 The economic objectives were contained in SO3. They were concerned with addressing worklessness, providing employment land, improving access to neighbouring districts key sites, encouraging new and emerging industries, facilitating development in the borough's 'centres' and in Business and Employment Areas (BEA's) and Saddleworth Employment Area (SEA's) and improving education and skills.

6.59 All the strategic objectives can be viewed on pages 11 - 13 of the 'Refining Options' document.

Spatial portrait

6.60 The spatial portrait was included as an Appendix within 'Refining Options'. It included statistics such as unemployment figures, numbers of employment areas and qualification levels and presented those statistics under district partnership headings. It explained that manufacturing is an important element of the borough's economy but recognised a need to diversify the economic base. It also flagged up the importance of the locations that form the ORESA 'M60 employment zone' (Chadderton Technology Park, Foxdenton and Hollinwood Business District) that form an 'arc of opportunity' that is a natural extension from the Manchester City Centre.

6.61 The full spatial portrait can be found on pages 111 - 130 of the 'Refining Options' Appendices document.

Policies

Policy 4 'Promoting Sustainable Regeneration and Prosperity'

6.62 Policy 4, 'Promoting Sustainable Regeneration and Prosperity'⁽⁷²⁾ built on Policy Direction 14, 'Promoting Economic Regeneration, Diversification, Growth and Prosperity' from 'Preferred Options'. It said, based on the Final ELR, that the borough will allocate

69 'Refining Options', page 6, Oldham Council, 2010.

70 Now referred to as Manchester City Centre.

71 Now referred to as 'our neighbouring districts key sites'.

72 'Refining Options', page 32, Oldham Council, 2010.

approximately 82 hectares of employment land in the Site Allocations DPD and that approximately half of this will be provided by land at Foxdenton and the remainder in sustainable and accessible locations.

- 6.63** The policy also highlighted the need to work with partners and developers, where appropriate, to explore opportunities to address deprivation and worklessness in the borough. Tackling worklessness is a key priority of the Sustainable Community Strategy and Local Area Agreement. The Sustainable Community Strategy and Local Area Agreement states that this is, "because progress in tackling worklessness will have direct impacts across the whole spectrum of LAA service delivery (education, health, crime, etc). Arguably, this factor will be the single most important determinant of the future prosperity and cohesion of the borough".⁽⁷³⁾
- 6.64** The policy also stated that the council will support diversification of the rural economy for business purposes. This is consistent with PPS4 which says that local planning authorities should set out criteria for planning applications for farm diversification. The supporting text went on to say that UDP policy OE1.11 'Farm Diversification' has been saved and this policy has within it criteria for assessing farm diversification applications.

Policy 4 - Post Refining Options

- 6.65** The main issue raised as part of the consultation in relation to this policy was from GONW who wanted the policy to be more explicit about how much new office floorspace will be required over the LDF period and where it will be go. The following underlined text has been added to the policy:
- a. 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, Hollinwood Business District, Chadderton Technology Park and the other established employment areas (which are now titled either 'Business and Employment Areas' or 'Saddleworth Employment Areas')."
 - b. 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 have regard to 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."
- 6.66** Please see Refining Options Schedule of Responses and the joint DPD for any other comments and minor amendments.

Policy 13 Employment Areas

73 See page 12 of Oldham's Community Strategy 2008-2020 and Local Area Agreement 2008-2011.

6.67 This policy⁽⁷⁴⁾ built on part of Policy Direction 2 'Regeneration' and part of Policy Direction 15 'Employment Areas' from the 'Preferred Options' document. It listed the designated employment areas in the borough, including the addition of Foxdenton as a new employment area. They were grouped under District Partnerships to help address comments GONW made at 'Preferred Options' stage to make the document more spatial. The policy was consistent with PPS4 which says that at a local level councils should be identifying a range of sites to facilitate a broad range of economic development. The Primary Employment Zone (PEZ) review, along with the Strategic Housing Land Availability Assessment and consultation responses received, helped determine which PEZ's were to be retained, de-designated and amended. The supporting text included details of the PEZ's that were proposed for de-designation. ('Refining Options', Appendix 6 and 'Preferred Options', Appendix 5 should be looked at in conjunction for any boundary amendments to former PEZ's.)

6.68 Below is a list of the 2006 UDP PEZ's, if and how they are being taken forward in the LDF and why any changes to boundaries or de-designations have occurred.

Table 1 Status of 2006 UDP Primary Employment Zones in the LDF

2006 UDP Designation	Status In LDF	Reason
PEZ 1 - West Failsworth	De-designated as employment area	The area is a key gateway to the borough and there may be redevelopment opportunities in the future.
PEZ 2 - Ashton Road, Failsworth	De-designated as employment area	The area is a key gateway to the borough and there may be redevelopment opportunities in the future.
PEZ 3 - Wrigley Street, Failsworth	Retained as BEA 1 with boundary changes	The boundary of the BEA has been amended for the LDF to exclude the Crown Street area which was judged as the weakest part of the employment area.
PEZ 4 - Hollinwood South	Retained as Hollinwood BEA with boundary changes	The boundary of the BEA has been amended for the LDF to combine with PEZ 5 and create a wider 'Hollinwood BEA'.
PEZ 5 - Hollinwood North	Retained as Hollinwood BEA with boundary changes	The boundary of the BEA has been amended for the LDF to combine with PEZ 4 and create a wider 'Hollinwood BEA'.
PEZ 6 - Hawksley Street, Oldham	Retained as BEA 2 with boundary changes	The boundary of the BEA has been amended for the LDF to exclude Royd Mill which was judged as the weakest part of the employment area.
PEZ 7 - Hollins, Oldham	De-designated as employment area	Area includes a number of mills that vary in quality, one of which has outline planning permission as a new school site.

74 'Refining Options', page 56, Oldham Council, 2010.

2006 UDP Designation	Status In LDF	Reason
PEZ 8 - Greengate/Broadgate, Chadderton	Retained as BEA 3	Whole area retained as BEA - area is a strong employment site and forms part of ORESA's 'M60 Employment Zone'.
PEZ 9 - Fields New Road, Chadderton	De-designated as employment area	Part of the site under construction for residential development; decision was made to de-designate the whole area.
PEZ 10 - Manchester Street/Westwood, Chadderton	Retained as Chadderton Technology Park BEA	Strong employment area - all retained as Chadderton Technology Park BEA.
PEZ 11 - Busk, Chadderton	Retained as BEA 4 with boundary changes	The boundary of the BEA has been amended for the LDF to exclude the weakest part of the employment area.
PEZ 12 - Fernhurst Mill, Chadderton	De-designated as employment area	Area seen as having no long term future solely as an employment area.
PEZ 13 - Primrose Bank, Oldham	Retained as BEA 5	Good site for business area - whole area retained as BEA.
PEZ 14 - Copster Hill, Oldham	De-designated as employment area	Area is within NDC Masterplan and should be developed in accordance with the masterplan aspirations.
PEZ 15 - Hathershaw	Retained as BEA 6	Important to retain BEA for businesses displaced by the loss of PEZ 14. Whole area retained as BEA.
PEZ 16 - Higginshaw / East Oldham	Retained as BEA 7 and BEA 10 with boundary changes	The boundary of the BEA has been amended for the LDF to form two BEA's. Part of the original area has been included within the new boundary for Oldham Town Centre
PEZ 17 - Wellyhole Street, Lees	De-designated as employment area	Area seen as having no long term future solely as an employment area.
PEZ 18 - New Street, Lees	De-designated as employment area	Part of the site has outline permission for residential development; decision made to de-designate the whole area.
PEZ 19 - Greenacres Road, Waterhead	De-designated as employment area	Area seen as having no long term future solely as an employment area.
PEZ 20 - New Coin Street, Royton	De-designated as employment area	Part of the site has outline planning permission for residential development;

2006 UDP Designation	Status In LDF	Reason
		decision was made to de-designate the whole area.
PEZ 21 - Shaw Road, Royton	Retained as BEA 8	Good site for business area - whole area retained as BEA.
PEZ 22 - Shaw	Retained as BEA 9 with boundary changes	The boundary of the BEA has been amended for the LDF to exclude a number a scrap yards to the west of the railway line. This is a result of representations received as a result of public consultation and as a result of assessing the employment areas. The amendment to this area was not made until the Refining Options document as the Council were awaiting the outcomes of the Retail and Leisure study.
PEZ 23 - Oak View Mill, Manchester Road, Greenfield	Retained as SEA 1	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.
PEZ 24 - Hey Bottom Mill, Greenfield	Retained as SEA 2	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.
PEZ 25 - Chew Valley Road, Greenfield	Retained as SEA 3	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.
PEZ 26 - Boarshurst Lane, Greenfield	Retained as SEA 4	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.
PEZ 27 - Waterside Mill, Greenfield	Retained as SEA 5	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.
PEZ 29 - Delph New Road, Delph	Retained as SEA 6	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.
PEZ 30 - Lumb Mill, Huddersfield Road, Delph	Retained as SEA 7 (name changed to Valley Mills, Huddersfield Road, Delph).	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth. There has been a name change to avoid confusion with another allocation.

2006 UDP Designation	Status In LDF	Reason
PEZ 31 - Shaw Pallets, Huddersfield Road, Diggle	Retained as SEA 8	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.
PEZ 32 - Warth / Ellis Mills, Huddersfield Road, Diggle	Retained as SEA 9	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.
PEZ 33 - Greenbridge Lane, Greenfield	Retained as SEA 10	Whole area retained as SEA to provide sustainable and local employment opportunities for residents of Saddleworth.

6.69 As mentioned previously Foxdenton was also designated a BEA.

Policy 13 - Post Refining Options

6.70 The main issue raised as part of the consultation in relation to this policy was from the Highways Agency (HA) that wanted references adding to the joint DPD to recognise the completion of the Greater Manchester transport modelling work and references added that the HA and the council will work together to address transport issues in the Site Allocations DPD.

6.71 Please see 'Refining Options' Schedule of Responses and the joint DPD for the amended text and any other comments and minor amendments.

Policy 14 Supporting Oldham's Economy

6.72 This policy⁽⁷⁵⁾ built on part of Policy Direction 2 'Regeneration', on part of Policy Direction 15 'Employment Areas' and Policy Direction 16 'Supporting the Local Economy' from the 'Preferred Options' document. It outlined the range of uses permitted within Business and Employment Areas (BEA's) and Saddleworth Employment Areas (SEA's).

6.73 Permitting a range of uses is consistent with PPS4 which says that at a local level councils should be identifying a range of sites to facilitate a broad range of economic development. Offices were included as uses permitted within BEA's and SEA's, however the policy says that development proposals should be consistent with national and local guidance and policies, including the sequential approach to site selection. This is consistent with the 'centres first' approach to offices and PPS4.

6.74 The uses permitted within Chadderton Technology Park and Hollinwood Business District employment areas are consistent with the aspirations of the councils masterplans. Foxdenton is described as an area for high-quality office, business and industrial developments with residential development permitted on up to 25% of the site to help fund any infrastructure requirements.

6.75 Within the other BEA's and SEA's the following uses were listed as being permitted:

- a. "B1 – Business.

75 'Refining Options', page 59, Oldham Council, 2010.

- b. B2 – General Industry.
- c. B8 – Storage or Distribution.
- d. A3 – Restaurants and Cafés.
- e. A4 – Drinking Establishments.
- f. A5 – Hot Food Takeaway (excluding SEA's 1 to 10)
- g. C1 – Hotels.
- h. Leisure facilities up to 1,000 square metres gross floorspace.
- i. Retail facilities up to 500 square metres gross floorspace.
- j. Building and construction related uses.
- k. Transport and transport-related uses.
- l. Waste management facilities.
- m. Garden centres".⁽⁷⁶⁾

6.76 Hot food takeaways have been excluded as a permitted use in SEA's as a result of feedback.

6.77 The policy outlined the circumstances where uses other than those listed may be suitable on the employment areas. This is to allow flexibility to accommodate any changes in circumstances and reflect the councils regeneration initiatives and priorities (for example Housing Market Renewal). It also listed measures to outweigh the loss of the site and support Oldham's economy in the event of a loss of employment land. Some of these have been formulated to specifically help tackle the borough's worklessness issues, such as employment initiatives and training schemes, while others are targeted towards assisting small businesses, such as managed workspace provision and discounted rental agreements.

Policy 14 - Post Refining Options

6.78 The main issue raised as part of the consultation in relation to this policy was from GONW who wanted the policy to be more explicit about how much new office floorspace will be required over the LDF period and where it will be go. The following underlined text has been added to the policy within the joint DPD:

6.79 "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."

6.80 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."

6.81 Another amendment made to this policy as a result of the consultation was that B8 (storage or distribution) has been included as a permitted use within Foxdenton, Hollinwood Business District and Chadderton Technology Park. This is to allow greater

76 'Refining Options', page 61, Oldham Council, 2010.

flexibility within these areas in the current economic circumstances and to reflect the reality on the ground. In the case of Hollinwood Business District it recognised the work that has been undertaken in relation to the European Union JESSICA⁽⁷⁷⁾ project.

- 6.82** Please see 'Refining Options' Schedule of Responses and the joint DPD for any other comments and minor amendments.

77 Joint European Support for Sustainable Investment in City Areas, 2010.

7 Foxdenton

- 7.1** In the borough's Unitary Development Plan (UDP), Foxdenton was allocated for 'Land Reserved for Future Development' (LRFD) and 'Other Protected Open Land' (OPOL). LRFD was described in the UDP as "land that is reserved for possible future development will be the first to be considered for development if allocated sites and stocks of brownfield land are insufficient to meet needs."⁽⁷⁸⁾ OPOL was described in the UDP as land "which provide significant open areas between, or on the edge of, built up areas of the borough".⁽⁷⁹⁾
- 7.2** In early 2007, Foxdenton was assessed as part of the first stage of the Employment Land Review carried out by Donaldsons.

ISSUES AND OPTIONS (Oldham Council, 2007)

- 7.3** Part of land at Foxdenton Lane was put forward on behalf of one the owners, Mr Blakeman, as a site for mixed development to meet housing and employment needs.⁽⁸⁰⁾

PREFERRED OPTIONS (Oldham Council, 2009)

Evidence Base

- 7.4** The relevant evidence base available at the time of 'Preferred Options' was:
- Foxdenton was assessed as part of the first stage of the Employment Land Review carried out by Donaldsons.
 - Oldham's 'Draft Employment Land Review' had been out to consultation by 'Preferred Options' stage.⁽⁸¹⁾

Draft strategic objectives

- 7.5** SO3 is the economic Strategic Objective and the overarching objective is to 'promote economic diversification, growth and prosperity and the sustainable economic regeneration of the borough'.

Preferred way forward

- 7.6** The preferred way forward proposed to promote economic diversification, growth and prosperity and sustainable economic regeneration.⁽⁸²⁾

Policy Directions

- 7.7** Policy directions were identified at this stage not the precise wording of the policies. The policy direction that was included in relation to Foxdenton included was Policy Direction 2 'Regeneration'.

78 Oldham Metropolitan Borough Unitary Development Plan, page 145, paragraph 11.51, Oldham Council, 2006.

79 Oldham Metropolitan Borough Unitary Development Plan, page 146, policy OE1.10, Oldham Council, 2006.

80 'Issues and Options': Public Schedule of Representations and Responses, page 34, Oldham Council, 2007.

81 Draft Employment Land Review, Oldham Council, 2007.

82 'Preferred Options', page 40, paragraph 8.8, Oldham Council, 2009.

Policy Direction 2 Regeneration

- 7.8** This policy direction⁽⁸³⁾ identified strategic sites across the borough. Building on work carried out at 'Issues and Options' stage, Policy Direction 2 included Hollinwood Business District, Chadderton Technology Park, Mumps and New West End as potential Strategic Sites. Due to emerging evidence base Foxdenton was also added as a potential Strategic Site.
- 7.9** For Foxdenton, fifteen comments were received with 47% supporting the strategic site. 26% did not express a view. Four government agencies made specific comments about the need to address particular issues, such as flood risk, if the strategic site is to be taken forward in the core strategy.
- 7.10** For a full summary of comments received in relation to Policy Direction 2 see 'Preferred Options': Public schedule of comments and responses', pages 86 - 92, Oldham Council, 2009.

REFINING OPTIONS (Oldham Council, 2010)

Evidence Base

- 7.11** The relevant evidence base available at the time of 'Refining Options' was:
- a. The Final ELR was completed in March 2010.
 - b. In June 2009 the Oldham and Rochdale Prospectus 'Investing in Jobs, Homes and Communities' by ORESA was published, it further supported the inclusion of Foxdenton as an employment area along with Hollinwood and Broadway Business Park, as part of the M60 Employment Zone.

Strategic Objectives

- 7.12** The economic objectives, as with the other joint DPD consultation document were contained in SO3. They were concerned with addressing worklessness, providing employment land, improving access to strategic regional sites, encouraging new and emerging industries, facilitating development in the boroughs centres and in Business and Employment Areas (BEA's) and Saddleworth Employment Area (SEA's) and improving education and skills.
- 7.13** All the strategic objectives can be viewed on pages 11 - 13 of the 'Refining Options' document.

Spatial portrait

- 7.14** The spatial portrait was included as an Appendix within 'Refining Options'. It flagged up the importance of the locations that form the ORESA 'M60 employment zone' (Foxdenton, Hollinwood Business District and Chadderton Technology Park) that form an arc of opportunity that is a natural extension from Manchester City Centre.
- 7.15** The full spatial portrait can be found on pages 111 - 130 of the 'Refining Options' Appendices document.

Policy 4 'Promoting Sustainable Regeneration and Prosperity'

83 'Preferred Options' document, page 52, Oldham Council, 2009.

7.16 Policy 4, 'Promoting Sustainable Regeneration and Prosperity'⁽⁸⁴⁾, built on Policy Direction 14, 'Promoting Economic Regeneration, Diversification, Growth and Prosperity' from 'Preferred Options'. In relation to Foxdenton it said, based on the Final ELR, that the borough will allocate approximately 82 hectares of employment land in the Site Allocations DPD and that approximately half of this will be provided by land at Foxdenton.

Policy 13 Employment Areas

7.17 This policy⁽⁸⁵⁾ built on part of Policy Direction 2 'Regeneration' and part of Policy Direction 15 'Employment Areas' from the 'Preferred Options' document. It outlined the designated employment areas in the borough, of which Foxdenton was included.

Policy 14 Supporting Oldham's Economy

7.18 This policy⁽⁸⁶⁾ built on part of Policy Direction 2 'Regeneration', on part of Policy Direction 15 'Employment Areas' and Policy Direction 16 'Supporting the Local Economy' from the 'Preferred Options' document. It outlined the range of uses permitted within Business and Employment Areas (BEA's) and Saddleworth Employment Areas (SEA's).

7.19 The uses permitted within Foxdenton were described as an area for high-quality office, business and industrial developments. Residential development may be permitted on up to 25% of the site to help fund any infrastructure requirements of the site. Offices were included as uses permitted within Foxdenton, however the policy said that development proposals should be consistent with national and local guidance and policies, including the sequential approach to site selection. This is consistent with the 'centres first' approach to offices and PPS4.

Foxdenton - Post 'Refining Options'

7.20 After the consultation the list of employment areas in Policies 13 and 14 have been re-ordered to include Foxdenton first to reflect its importance as part of the borough's employment land portfolio.

7.21 Appendix 5 of 'Refining Options' was added to the supporting text of Policy 14 to strengthen the case for Foxdenton.

7.22 Another amendment made to this policy as a result of the consultation was that B8 (storage or distribution) has been included as a permitted use within Foxdenton. This is to allow greater flexibility within the area.

7.23 Comments were also made by the Highways Agency and GMPTE regarding the public transport accessibility of the area. New text has been included to address these comments.

7.24 Please see 'Refining Options' Schedule of Responses and the joint DPD for any other comments and minor amendments.

84 'Refining Options' document, page 32, Oldham Council, 2010.

85 'Refining Options' document, page 56, Oldham Council, 2010.

86 'Refining Options' document, page 59, Oldham Council, 2010.

8 Centres

ISSUES SURVEY (Oldham Council, 2007)

Evidence Base

8.1 The relevant evidence base available at the time of the Issues Survey was:

- National – Planning Policy Statement 6 'Planning for Town Centres' (PPS6)
- Local - Oldham Metropolitan Borough UDP

8.2 For 'centres', the vast majority (78.8%) of respondents believed that Oldham Town Centre and the borough's other centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill should be the focus for large-scale shops, offices, banks and restaurants.⁽⁸⁷⁾

ISSUES AND OPTIONS (Oldham Council 2007)

Evidence Base

8.3 The relevant evidence base available at the time of 'Issues and Options' was:

- National – Planning Policy Statement 6 'Planning for Town Centres' (PPS6)
- Local – Oldham Metropolitan Borough UDP and LDF Scoping Report

8.4 Under the 'Economic Development and Enterprise' heading a section was included on retailing. This provided background information about shopping in the borough and asked a series of questions about vitality and viability of 'centres', about whether we should identify local and neighbourhood centres, about the threshold for local needs shops, and about how we can support and encourage the independent retail sector.⁽⁸⁸⁾

Draft spatial portrait

8.5 The spatial portrait included a section on the borough's 'centres'.⁽⁸⁹⁾

Draft vision

8.6 The draft vision highlighted the role of 'centres' generally, and specifically in relation to the economy and transport.⁽⁹⁰⁾

Draft strategic objectives

8.7 Proposed draft strategic objectives also highlighted the role of 'centres' generally. Specific reference was made in SO1 (the over-arching objective), SO3 (the economic development and enterprise objective), SO5 (the safer and stronger communities objective) and SO7 (children and young people objective).⁽⁹¹⁾

87 Issues Survey - Analysis of Responses, page 15, Oldham Council, August 2007.

88 'Issues & Options', pages 31-32, paragraph 6.32, Oldham Council, 2007.

89 'Issues and Options', page 20, paragraph 5.4, Oldham Council, 2007.

90 'Issues and Options', page 58, Oldham Council, 2007.

91 'Issues and Options', pages 59-61, Oldham Council, 2007.

8.8 References to `centres` were included in all three of the alternative planning and development strategies that were proposed.⁽⁹²⁾

Draft core policies

8.9 The Issues and Options document identifies broad types of core policies to be included within the joint DPD. In relation to 'centres' one was proposed, CP7 'Oldham Town Centre, the District Centres and local and neighbourhood centres'.

8.10 The policy CP7⁽⁹³⁾ referred to:

- a. identifying the borough's retail hierarchy and any development thresholds;
- b. providing the framework for local area-based masterplans; and
- c. to provide a framework for the range of suitable uses that would contribute towards sustainable communities.

Draft development management policies

8.11 One development management policy DC8 was included, 'Protecting the Vitality and Viability of Oldham Town Centre, the District Centres and local and neighbourhood centres.'⁽⁹⁴⁾

8.12 The purpose of this was to supplement CP7 by adding further technical details on the range of acceptable uses in `centres` and for addressing the night-time economy.

8.13 At this stage, the comments submitted generally referred to the importance of recognising and addressing 'centres` in the policy framework.⁽⁹⁵⁾

PREFERRED OPTIONS (Oldham Council, 2009)

Evidence Base

8.14 The relevant evidence base available at the time of 'Preferred Options' was:

- National – Planning Policy Statement 6 `Planning for Town Centres' (PPS6)
- Local – Oldham Metropolitan Borough UDP and LDF Scoping Reports

Spatial Portrait

8.15 The spatial portrait included a section on the borough's `centres`⁽⁹⁶⁾

Draft vision

8.16 The draft vision highlighted the role of `centres` generally, and specifically in relation to the economy and transport.⁽⁹⁷⁾

Draft strategic objectives

92 'Issues and Options', pages 62-70, Oldham Council, 2007.

93 'Issues and Options', page 73, Oldham Council, 2007.

94 'Issues and Options', page 77, Oldham Council, 2007.

95 'Issues and Options' - public schedule of comments and responses, pages 65-72, Oldham Council, 2008.

96 'Preferred Options', page 30, paragraph 5.22, Oldham Council, 2009.

97 'Preferred Options', page 36, Oldham Council, 2009.

8.17 Proposed draft strategic objectives also highlighted the role of `centres` generally. Specific reference was made in SO1 (the over-arching objective), SO3 (the economic development and enterprise objective), SO5 (the local environment objective) and SO7 (the education and skills objective).⁽⁹⁸⁾

Preferred way forward

8.18 The preferred way forward proposed that the borough's centres would form a key element of the focus for housing, retail and employment developments.⁽⁹⁹⁾

Policy Directions

8.19 Policy Direction 17 `Town Centres`⁽¹⁰⁰⁾ outlined the matters that the LDF policy could address.

- It set out how we can promote the vitality and viability of Oldham Town Centre and the borough's seven other centres.
- The approach towards major retail and leisure developments.
- The proposed borough's retail hierarchy based on the sub-regional centre of Oldham Town Centre and the borough's other centres, and possibly local centres depending on the findings of the borough's retail and leisure study which was still being assembled by WYG.
- It also set out that the policy would outline the boundaries of the centres and any shopping frontages.
- As well as the approach to developments outside the town centres (sequential approach and impacts on vitality and viability).
- The policy also flagged up specific issues of public realm and cultural facilities in Oldham Town Centre.

8.20 At this stage, the comments submitted generally referred to specific aspects of the policy framework. For example, NWDA flagged up that policy on town centres needs to deal with office developments as well as retail and leisure. Saddleworth Parish Council flagged up use of the term `town centres` itself being applied to Saddleworth. Sainsbury's and the Theatres Trust supported the policy. Tesco wanted Greenfield to be designated `district centre` status.⁽¹⁰¹⁾

REFINING OPTIONS (Oldham Council, 2010)

Evidence Base

8.21 The relevant evidence base available at the time of 'Refining Options' was:

- National – Planning Policy Statement 4 'Planning for Sustainable Economic Growth' (PPS4)
- Local – Oldham Metropolitan Borough UDP, LDF Scoping Reports, Oldham Retail and Leisure Study

8.22 In relation to centres the document contains the following:

98 'Preferred Options', pages 37-38, Oldham Council, 2009.

99 'Preferred Options', pages 39-45, Oldham Council, 2009.

100 'Preferred Options', pages 86-87, Oldham Council, 2009.

101 'Preferred Options' - public schedule of comments and responses, pages 215-216, Oldham Council, 2009.

- Core Policy 1 `Climate Change and Sustainable Development`
- Development management Policy 15 `Centres`

Spatial Portrait

8.23 The spatial portrait included appropriate references to the borough's `centres`⁽¹⁰²⁾

Vision

8.24 The vision highlighted the role of Oldham Town Centre and the borough's other centres generally.⁽¹⁰³⁾

Strategic objectives

8.25 The strategic objectives also highlighted the role of `centres` generally. Specific references were made in SO1 (the over-arching objective), SO2 (the address of choice objective), SO3 (the economic prosperity objective), SO5 (the communities objective)⁽¹⁰⁴⁾

Preferred way forward

8.26 The preferred way forward proposed that the borough's centres would form a key element of the focus for housing, retail and employment developments.⁽¹⁰⁵⁾

Policies

Policy 1 `Climate Change and Sustainable Development`

8.27 Policy 1 `Climate Change and Sustainable Development`⁽¹⁰⁶⁾ sets out the general approach to promoting the vitality and viability of Oldham Town Centre and the borough's other centres.

Policy 15 `Centres`

8.28 Policy 15 `Centres`⁽¹⁰⁷⁾, took account of the PINS front loading consultation meeting in January 2010.

8.29 Policy 15 set out the borough's retail hierarchy. This is based on Oldham Town Centre followed by the borough's other centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill. The hierarchy does not define local centres or neighbourhood centres.

8.30 Policy 15 is separated into three distinct parts:

- uses;
- primary shopping frontages; and
- the night-time economy.

102 'Refining Options', Appendix 2, paragraphs A2.18, A2.41, A2.48, A2.49, A2.53, A2.57, Oldham Council, 2010.

103 'Refining Options' pages 6-10, Oldham Council, 2010.

104 'Refining Options', pages 11-13, Oldham Council, 2010.

105 'Refining Options', pages 14-18 and 'Refining Options' Appendix 3, pages 142-161, Oldham Council, 2010.

106 'Refining Options', Policy 1 criteria c, page 20, Oldham Council, 2010.

107 'Refining Options', page 63, Oldham Council, 2010.

Uses

8.31 The section on acceptable uses is based on the advice of the PINS frontloading visit. It includes reference to PPS4 rather than PPS6, as highlighted by GONW as part of the PINS meeting. The policy is worded so as not to duplicate the policies that are already set out in higher level statements and strategies. This ensures that we are consistent with national policy in relation to such matters as impact assessments and the sequential approach.

Primary Shopping Frontages

8.32 The section on primary shopping frontages is designed to deal with ensuring the prime retail areas in the borough's centres remain in active commercial retail uses. They have been reviewed and assessed, with appropriate and necessary changes made, from those in the adopted UDP. An appendix was included within Refining Options to include details of the map changes. In the joint DPD the map changes are shown within Appendix 4.

Night-time economy

8.33 The section on the night-time economy is designed to address the challenges that we currently face within the borough's centres, particularly Oldham Town Centre. This is primarily about addressing the drinking culture and associated anti-social behaviour that affects the town centre, particularly along Yorkshire Street. The policy aims to control the number of drinking and eating establishments by ensuring that their potential impacts on, amongst other things, the amenity of people working and living within the vicinity, the local environment, traffic flows and crime, are fully taken into consideration when dealing with new (or amended) proposals.

8.34 This policy is supported by the Oldham Town Centre Partnership, which consists of a range of public sector agencies and private businesses, as having a major role in bringing about the changed culture it wants to see for the borough. As a result of the 'Refining Options' consultation the Oldham Town Centre Partnership made the following comments, on the 'night time economy' section of the policy:

"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".

"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".

"Hot food takeaways are detrimentally affecting the Town Centre in terms of:

- 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"

"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".

"The concentration of hot food takeaways in these areas is also impacting on the variety of uses in areas, and in the case of Yorkshire Street and Union Street, their viability and identity as independent retailing areas which should make a very important contribution the overall vitality and diversity of the Town Centre".

Boundaries

8.35 The joint DPD defines the boundaries of the borough's centres showing any changes from the 2006 UDP boundaries.⁽¹⁰⁸⁾ In essence, the changes (to centre boundaries and primary shopping frontages, where appropriate) have been limited to reflect the reality on the ground with a 'tidying up' exercise for the centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill and an extension of Oldham Town Centre to the east to include the area covered by the Mumps masterplan. These changes are fully justified.

8.36 We have indicated that all the boundaries will be re-assessed and reviewed as part of the Site Allocations DPD which will commence only after this joint DPD has been adopted.

Thresholds

8.37 Policy 15 sets out details about how we will assess the impacts of proposals on the borough's centres. Essentially, we will rely on the thresholds set out in national guidance to determine whether a proposal will be subject to an impact assessment, supplemented by local factors. We will require proposals above 2,500 square metres gross floorspace to be subject to an impact assessment taking account of the matters outlined in PPS4. We have also set out details of how we will deal with proposals below this national threshold. So retail proposals up to 500 square metres gross floorspace and leisure and office developments up to 1,000 square metres will not be required to undergo an impact assessment. Essentially we are saying that they meet a 'local' need and will therefore be judged against other criteria outlined in the LDF, such as design, amenity, traffic and so on. Proposals above these 'local' needs threshold but below the national threshold (that is between 500/1,000-2,500 square metres gross floorspace) will be judged on their merits. Each medium-scale proposal will be assessed on a case by case basis having regard to the amount of floorspace, the nature of the commercial activity and its location. We would still envisage that the statement would deal with the key matters set out in national guidance, it is just that the level of detail required would not be as great as that for large-scale proposals. This approach will allow certainty for developers and the council in relation to small-scale and large-scale proposals, and will allow flexibility for medium-scale proposals to be judged on an individual basis.

Conditions

8.38 As local planning policy on retail has evolved over the years here in the borough we have developed a 'bulky goods' schedule which is applied to out-of-centre comparison goods proposals, if and where appropriate. This is a means of controlling their impacts

108 See joint DPD, Appendix 4, Oldham Council, 2010.

on the vitality and viability of Oldham Town Centre and the borough's other centres. The schedule was first formalised in the 2006 UDP (Appendix C). Although referred to as 'bulky goods', the schedule is actually wide-ranging and essentially excludes only clothing and footwear comparison goods. The WYG study distinguished between bulky and non-bulky comparison goods. The schedule has served Oldham well over the years and is a commonly understood and accepted local condition that continues to serve a purpose as the council and partners seek to promote the health of Oldham Town Centre and the borough's other centres and to ensure they remain the focus for development opportunities in the foreseeable future. The schedule will continue to be required until these centres are fully pulling their weight in Greater Manchester.

Policy 15 - Post Refining Options

8.39 The main issue raised as part of the 'Refining Options' consultation in relation to this policy was from GONW who wanted the policy to be more explicit about how much new retail floorspace will be required over the LDF period and where it will be go. The following underlined text has been added to the policy in the second section, under the 'Uses' heading a new paragraph has been added 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".

8.40 After paragraph 6.56 of 'Refining Options' - new supporting text added:

"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".

"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), which are identified to have a potential comparison goods turnover of up to £94 million, 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".

"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".

"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".

- 8.41** Please see Refining Options Schedule of Responses and the joint DPD for any other comments and minor amendments.

9 Policy 1 Climate Change and Sustainable Development

9.1 Policy 1 on Climate Change and Sustainable Development sets the overall context for the joint DPD and states that the council will:

(c) promote the vitality and viability of the borough's centres by focusing major retail and leisure developments on Oldham Town Centre and appropriate levels of development in the borough's other centres; and

(d) promote economic prosperity and meet the needs of existing and new businesses by providing employment land in areas that are accessible by public transport.

Policy 1 is “sound” in terms of the PPS12 guidance. It is justified, effective and consistent with national policy as shown in the box below.

Consistent with National Policy	Policy 1 is consistent with PPS4.
Justified - founded on robust evidence	Policy 1 is supported by a credible and robust evidence. This includes PPS4, the Greater Manchester Employment Land Position Statement, Oldham's Employment Land Review, Oldham's Retail and Leisure Study, Oldham Beyond, the ORESA Prospectus and through representations made at the 'Issues Survey', 'Issues and Options', 'Preferred Options' and 'Refining Options' stages of the joint DPD preparation.
Justified - the most appropriate strategy	Policy 1 outlines the amount of employment land the borough will need and directs it to the most accessible and sustainable locations. The policy is the most appropriate way forward.
Effective - deliverable	Policy 1 will deliver a prosperous economy and promote the borough's centres.
Effective - flexible	Policy 1 provides a sound planning framework to meet the needs of the borough's urban and rural communities over the plan period.
Effective - able to be monitored	Policy 1 will be monitored by all LDF indicators.

10 Policy 4 Promoting Sustainable Regeneration and Prosperity

10.1 This policy is the core economy policy which sets out the council's way forward in relation to the economy. It says the borough will need to provide approximately 82 hectares of employment land up to 2026, and that approximately half of this will be provided by land at Foxdenton and the rest in sustainable and accessible locations. It also says the council will promote and support the development of a range of low carbon industries, work with partners to ensure that our neighbouring districts key sites are accessible to local people, explore opportunities to address deprivation and worklessness in the borough and support the diversification of the rural economy.

10.2 Policy 4 is “sound” in terms of the PPS12 guidance. It is justified, effective and consistent with national policy as shown in the box below.

Consistent with National Policy	Policy 4 is consistent with PPS4.
Justified - founded on robust evidence	Policy 4 is founded on credible and robust evidence and has been informed by, PPS4, the Greater Manchester Employment Land Position Statement, Oldham's Employment Land Review, Oldham Beyond, the ORESA Prospectus and through representations made at the 'Issues Survey', 'Issues and Options', 'Preferred Options' and 'Refining Options' stages of the joint DPD preparation.
Justified - the most appropriate strategy	Policy 4 is the most appropriate way forward as it outlines the amount of employment land the borough will need and directs it to the most accessible and sustainable locations. The policy is the most appropriate way forward.
Effective - deliverable	Policy 4 includes reference to the borough's BEA's and SEA's which are deliverable as they have been assessed and any that were not considered deliverable have been de-designated.
Effective - flexible	Policy 4 allows for flexibility in that a number of the criteria, such as working with developers to explore opportunities to address deprivation and worklessness in the borough have been included but only 'where appropriate' so that the authority and developers can discuss the way forward.
Effective - able to be monitored	Policy 4 will be monitored by LDF indicators 2, 3, 4, 5, 6, 7, 8, 9, 10, 46.

11 Policy 13 Employment Areas

- 11.1** This policy is sets out the broad locations in the borough that will form our employment land portfolio. The policy has a place-based dimension and groups the BEA's and SEA's under district partnership areas. The policy takes account of, amongst other things, the Employment Land Review.
- 11.2** Policy 13 is “sound” in terms of the PPS12 guidance. It is justified, effective and consistent with national policy as shown in the box below.

Consistent with National Policy	Policy 13 is consistent with PPS4.
Justified - founded on robust evidence	Policy 13 is founded on credible and robust evidence and has been informed by, PPS4, the Greater Manchester Employment Land Position Statement, Oldham's Employment Land Review, Oldham Beyond, the ORESA Prospectus and through representations made at the 'Issues Survey', 'Issues and Options', 'Preferred Options' and 'Refining Options' stages of the joint DPD preparation.
Justified - the most appropriate strategy	Policy 13 is the most appropriate way forward as it outlines our approach to employment land, 'keep the best and recycle the rest' which is a sustainable approach that will help promote economic prosperity. The policy is the most appropriate way forward.
Effective - deliverable	Policy 13 includes the borough's BEA's and SEA's which are all deliverable.
Effective - flexible	Policy 13 outlines a number of broad locations of varying sizes for business and employment throughout the borough offering flexibility for investors and businesses.
Effective - able to be monitored	Policy 13 will be monitored by LDF indicators 2, 3, 4, 5, 6, 7, 8, 9, 10, 46.

12 Policy 14 Supporting Oldham's Economy

12.1 Policy 14 supports policy 13 'Employment Areas'. It sets out the different types of uses that will be permitted in the different locations to satisfy the borough's economic aspirations. It also sets out the circumstances when current employment land can be released for other uses, and how we will work with developers to support the local economy.

12.2 Policy 14 is "sound" in terms of the PPS12 guidance. It is justified, effective and consistent with national policy as shown in the box below.

Consistent with National Policy	Policy 14 is consistent with PPS4.
Justified - founded on robust evidence	Policy 14 is founded on credible and robust and has been informed by, PPS4, the Greater Manchester Employment Land Position Statement, Oldham's Employment Land Review, Oldham Beyond, the ORESA Prospectus and through representations made at the 'Issues Survey', 'Issues and Options', 'Preferred Options' and 'Refining Options' stages of the joint DPD preparation.
Justified - the most appropriate strategy	Policy 14 is the most appropriate way forward as it outlines the uses permitted within the borough's employment areas and outlines measures to support the borough's economy which should help achieve the LAA theme of economic prosperity. The policy is the most appropriate way forward.
Effective - deliverable	Policy 14 includes the uses that are permitted within BEA's and SEA's which are all deliverable.
Effective - flexible	Policy 14 permits a number of employment uses within the BEA's and SEA's - this allows development flexibility. The policy also outlines circumstances where uses other than those listed may be permitted in employment areas. This allows for flexibility within the policy in certain circumstances.
Effective - able to be monitored	Policy 14 will be monitored by LDF indicators 2, 3, 5, 6, 7, 8, 9, 46.

13 Policy 15 Centres

13.1 Policy 15 'Centres' sets out the borough's approach to promoting the vitality and viability of Oldham Town Centres and the borough's centres. It also outlines the approach to uses, primary shopping frontages and the night-time economy.

13.2 Policy 15 is "sound" in terms of the PPS12 guidance. It is justified, effective and consistent with national policy as shown in the box below.

Consistent with National Policy	Policy 15 is consistent with PPS4.
Justified - founded on robust evidence	Policy 15 is founded on credible and robust and has been informed by the WYG retail and leisure study which provides up-to-date information on the health of the borough's centres, the retail hierarchy and the capacity for future growth that has informed Policy 15. The policy has also been informed by representations made at the 'Issues Survey', 'Issues and Options', 'Preferred Options' and 'Refining Options' stages of the joint DPD preparation.
Justified - the most appropriate strategy	Policy 15 puts in place a 'centres first' approach for retail, leisure and office developments as advocated by national policy (PPS4). It supports the Sustainable Community Strategy aspirations and plans for Oldham Town Centre and the borough's other centres. The policy is the most appropriate way forward.
Effective - deliverable	Policy 15 sets out the approach towards our 'centres'. It is supported by the Oldham Town Centre Partnership, which is a mix of relevant public sector agencies and private enterprises with interests in Oldham Town Centre.
Effective - flexible	Policy 15 offers flexibility in terms of the uses that will be permitted in our centres and requirements for impact assessments. It indicates that the boundaries of the borough's centres will be reviewed as part of the Site Allocations DPD.
Effective - able to be monitored	Policy 15 will be monitored by LDF indicators 10, 23.

14 Policy 25 Developer Contributions

14.1 The developer contributions policy sets out the councils approach to developer contributions for the provision of additional, improved or extended green, social or physical infrastructure.

14.2 Policy 25 is “sound” in terms of the PPS12 guidance. It is justified, effective and consistent with national policy as shown in the box below.

Consistent with National Policy	Policy 25 puts in place the framework for new developments, where appropriate, to contribute to securing the borough's additional, improved or extended green, social or physical infrastructure consistent with national policy on developer contributions.
Justified - founded on robust evidence	Policy 25 is founded on credible and robust of evidence. This includes, amongst other things, Circular 05/05 and representations made at the 'Issues Survey', 'Issues and Options', 'Preferred Options' and 'Refining Options' stages of the joint DPD preparation.
Justified - the most appropriate strategy	Policy 25 puts in place the framework for new developments, where appropriate, to contribute to securing additional, improved or extended green, social or physical infrastructure consistent with national policy on developer contributions. It supports the Sustainable Community Strategy aspirations and plans. The policy is the most appropriate way forward.
Effective - deliverable	Policy 25 will contribute towards meeting the borough's additional, improved or extended green, social or physical infrastructure needs, where appropriate.
Effective - flexible	Policy 25 provides a sound planning framework to meet the borough's additional, improved or extended green, social and physical infrastructure needs, where viable and appropriate.
Effective - able to be monitored	Policy 25 will be monitored by all LDF indicators, where appropriate.

15 Sustainability Assessment

- 15.1** A Sustainability Appraisal was carried out for the joint DPD. Below is a summary of the key findings for the economy policies.
- 15.2** Policy 4 'Promoting Sustainable Regeneration and Prosperity' scored positively in relation to the sustainability objectives. Key points in relation to the economic, environmental and social sustainability objectives are:
- **Economic:** The policy positively promote the sustainable regeneration of the borough by supporting the development of a range of low carbon industries. It will also significantly promote the sustainable economic performance of the borough by providing opportunities for development in a range of locations. The policy will also positively promote the development of innovative and knowledge based industries.
 - **Environmental:** The policy will ensure the effective and efficient use of all types of land and buildings in the most sustainable locations by focusing new employment development in established employment areas and in sustainable and accessible locations including the borough's centres. Locating employment land in areas that are accessible and sustainable will also reduce the need to travel .
 - **Social:** The policy will promote community cohesion in the borough by providing local job opportunities. The policy will also ensure employment areas are in accessible and sustainable locations meaning employment opportunities are accessible for residents.
- 15.3** In relation to Policy 13 'Employment Areas' each of the current UDP Primary Employment Zones were assessed against the sustainability objectives. All of the employment areas carried forward in the joint DPD (Business and Employment Areas - BEA's and Saddleworth Employment Areas - SEA's) scored positively against the sustainability objectives. Key points in relation to the economic, environmental and social sustainability objectives are:
- **Economic:** The BEA's and SEA's in the joint DPD positively promote the sustainable regeneration of the borough, the sustainable economic performance of the borough and the sustainable economic growth of the borough by providing land for new and existing businesses.
 - **Environmental:** The BEA's and SEA's in the joint DPD will reduce the need to travel by providing local employment opportunities in accessible locations. Designating the BEA's and SEA's will protect and enhance green infrastructure by relieving pressure from other areas for development.
 - **Social:** The BEA's and SEA's in the joint DPD will promote mixed, balanced and inclusive sustainable communities by providing local job opportunities. The BEA's and SEA's in the joint DPD will also promote accessibility to key services by contributing to the mix of services available. The BEA's and SEA's in the joint DPD will promote a healthy and balanced housing market by providing the supply of employment land to accommodate economic growth and jobs and therefore have a positive effect on the housing market.
- 15.4** Policy 14 'Supporting Oldham's Economy' scored positively in relation to the sustainability objectives. Key points in relation to the economic, environmental and social sustainability objectives are:

- **Economic:** The policy positively promote the sustainable regeneration of the borough by supporting the development of a range of low carbon industries. It will also significantly promote the sustainable economic performance of the borough by providing opportunities for development in a range of locations. The policy will also positively promote the development of innovative and knowledge based industries.
- **Environmental:** The policy will reduce the need to travel and promote sustainable transport choices as one of the measures in the policy to outweigh the loss of employment land to other uses is contributions towards new bus services to support residents in travelling to employment locations.
- **Social:** The policy will promote community cohesion in the borough by providing local job opportunities. The policy will also ensure employment areas are in accessible and sustainable locations meaning employment opportunities are accessible for residents. The policy will improve education and skills levels of the borough's population as one of the measures in the policy to outweigh the loss of employment land to other uses is seeking contributions towards training initiatives to raise skills levels within the workforce and the unemployed.

15.5 Policy 15 `Centres` scored positively in relation to the sustainability objectives. Below is a summary of the key points in relation to the economic, environmental and social sustainability objectives:

- **Economic:** The policy will ensure that we take a `centres first` approach towards new retail, leisure and office developments. The policy seeks to promote the vitality and viability of Oldham Town Centre and the borough's other centres.
- **Environmental:** The policy will help ensure the effective and efficient use of land by directing development towards our centres which will help with regeneration and protect greenfield sites from development pressures.
- **Social:** The policy will help promote accessible developments and help to promote sustainable communities.

16 Habitats Regulations Assessment

16.1 A Habitats Regulation Assessment of the joint DPD was undertaken by Greater Manchester Ecology Unit on the impact on European Protected Sites. This Screening Opinion included an assessment of the possible effects of the plan on the South Pennine Moors (SPA/SAC) and the Rochdale Canal (SAC). The HRA assessed each policy.

Policy 4 'Promoting sustainable regeneration and prosperity'

16.2 In relation to policy 4 the HRA concluded that there are no significant negative impacts on the South Pennine Moors anticipated from the operation of the policy. However a potential impact was identified in relation to the Rochdale Canal. This was that development in certain employment areas may conceivably affect the SAC by causing increases in diffuse water and/or air pollution. The HRA further assessed three sites in relation to the policy, Hollinwood Business District, Chadderton Technology Park and Foxdenton. The recommendation of this further assessment was that any development proposals coming forward within Hollinwood Business District, Chadderton Technology Park and Foxdenton be referred for a possible HRA as part of the development management process so that appropriate mitigation for any damaging impacts can be implemented.

Policy 13 'Employment Areas'

16.3 In relation to policy 13 the HRA concluded that there are no significant negative impacts on the South Pennine Moors anticipated from the operation of the policy. However a potential impact was identified in relation to the Rochdale Canal. This was that development in certain employment areas may conceivably affect the SAC by causing increases in diffuse water and/or air pollution. The HRA further assessed three sites in relation to the policy, Hollinwood Business District, Chadderton Technology Park and Foxdenton. The recommendation of this further assessment was that any development proposals coming forward within Hollinwood Business District, Chadderton Technology Park and Foxdenton be referred for a possible HRA as part of the development management process so that appropriate mitigation for any damaging impacts can be implemented.

Policy 14 'Supporting Oldham's Economy'

16.4 In relation to policy 14 the HRA concluded that there are no significant negative impacts on the South Pennine Moors anticipated from the operation of the policy. However a potential impact was identified in relation to the Rochdale Canal. This was that development in certain employment areas may conceivably affect the SAC by causing increases in diffuse water and/or air pollution. The HRA further assessed three sites in relation to the policy, Hollinwood Business District, Chadderton Technology Park and Foxdenton. The recommendation of this further assessment was that any development proposals coming forward within Hollinwood Business District, Chadderton Technology Park and Foxdenton be referred for a possible HRA as part of the development management process so that appropriate mitigation for any damaging impacts can be implemented.

Policy 15 'Centres'

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- 16.5** Failsworth centre is close to the Rochdale Canal SAC and it is possible that development here may effect the SAC through diffuse water pollution, shading, and increased boat traffic. The HRA concluded provided that the mitigating plans, policies and strategies are implemented appropriately through the development management process it is considered that there will be sufficient safeguards in place to avoid significant harm to the special interest of the Rochdale Canal arising from development in Failsworth centre. It is considered that there is insufficient justification for preventing all development in this area because of potential impact on the SAC.
- 16.6** No significant negative impacts on the South Pennine Moors anticipated from the operation of this policy.

17 Equalities Impact Assessment

- 17.1 An Equalities Impact Assessment (EqIA) of the joint DPD has been undertaken. The purpose of the EqIA was to assess the potential impact of the joint DPD on the different groups of people in the borough.
- 17.2 The initial EqIA concluded that the joint DPD is not considered to have an adverse impacts on the different groups of people and that a full EqIA is not needed.

18 Infrastructure

- 18.1** In relation to infrastructure, the Business and Employment Areas (BEA's) and Saddleworth Employment Areas (SEA's), are, on the whole, already established employment sites and therefore infrastructure needs are expected to be minimal. Foxdenton is currently open land so it will require some new infrastructure. For example, GMPTE and the Highways Agency have commented that parts of Foxdenton are not fully accessible by public transport - issues such as this this will need to be addressed in the bringing forward of the site through the Site Allocations DPD.
- 18.2** United Utilities have confirmed that there is enough water resource capacity to accommodate the growth proposed in the joint DPD.

19 Monitoring

19.1 The joint DPD sets out a monitoring framework to monitor the effectiveness of the DPD. This sets out indicators, the relevant strategic objectives, targets and commentary and arrangements for reviewing. The indicators that will monitor the effectiveness of the economy policies are:

- a. Total amount of additional employment floorspace by type (Core AMR indicator);
- b. Total amount of employment floorspace on previously developed land by type (Core AMR indicator);
- c. Employment land available by type (Core AMR indicator);
- d. Employment land lost to other uses (Local AMR indicator);
- e. Land developed for business and industry (Local Core AMR indicator);
- f. New business registration rates (National Indicator 171 (LAA Tier 1));
- g. Overall employment rate (National Indicator 151 (LAA Tier 1)); and
- h. Total amount of floorspace for 'centre' uses (Core AMR indicator).
- i. Foxdenton developed as premium employment site