

**Oldham**

**Local**

**Development**

**Framework**

## **Summary of the main issues raised at Publication Stage**

Joint Core Strategy and Development Management Policies  
Development Plan Document

**February 2011**



**Oldham**  
Council

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## 1 Introduction

- 1.1 From 14 October to 26 November 2010 we consulted on the publication stage for our Joint Core Strategy and Development Management Policies Development Plan Document (or simply the Joint DPD) that we intended to submit to the Planning Inspectorate for examination in 2011. This was in line with Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).
- 1.2 The document, which we called `Proposed Submission`, was largely based on the draft version we had consulted on in May / June 2010 (which was itself called the `Refining Options` stage) together with any changes that had arisen as a result of that consultation during the spring.
- 1.3 The publication stage main document summarised the main issues and key challenges facing the borough. It included a vision, a planning and development strategy and a suite of policies. The policies were 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.
- 1.4 In addition to the main document we also published a number of other documents. These included appendices, a Sustainability Appraisal (SA) report and non-technical summary of the SA, a Habitats Regulations Assessment (HRA), and an Equalities Impact Assessment (EqIA). We published a Consultation Statement which set out details of how we have engaged people in preparing the LDF. We published a series of background papers on housing, economy, communities, green infrastructure and historic environment and natural resources, that provided further information about the Joint DPD. We also published an Infrastructure Study which provided details about how the LDF would be implemented and delivered.

### **About the Summary of Main Issues raised at Publication Stage**

- 1.5 This 'Summary of Main Issues raised at Publication Stage' report sets out the number of representations received on the 'Proposed Submission' consultation documents and a summary of the main issues raised in those representations. This report has been prepared in line with Regulations 28 and 30 (1) (e) of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

## 2 Representations on the Proposed Submission

- 2.1** Fifty-one people and organisations submitted responses to the publication stage in line with Regulation 28 of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 (i.e. they were made within the specified consultation period, between 14 October and 26 November 2010). Responses were received from a number of statutory agencies including, Government Office for the North West (GONW), Northwest Regional Development Agency (NWDA), Environment Agency, Coal Authority, Natural England, Highways Agency, Greater Manchester Passenger Transport Executive (GMPTE), Oldham Town Centre Partnership, United Utilities and National Trust. Chorlton Planning submitted one set of general comments on behalf of 29 clients, as well as 22 site-specific comments on behalf of some of these clients. David Alan Bennett consultancy submitted one set of general comments on behalf of the two main landowners for Foxdenton.
- 2.2** In addition, general comments were received from United Utilities, Councillor Colin McLaren and Broadway Residents Association and an objection was received from Sport England outside of the consultation period.
- 2.3** Overall, **303** separate comments were made. Table 1 shows a summary of those comments based on the nature of the comments and whether they were submitted within the specified consultation period.

**Table 1 Summary of comments received**

Nature of comment	Total comments	Comments received within the consultation period	Comments received after the consultation period
Support (S)	125	125	0
Support with comments (recorded as a Qualified Support - QS)	5	5	0
General comments (GC)	42	17	25
No comments (NC)	8	8	0
Objections <sup>(1)</sup>	123	120	3
<b>Total:</b>	<b>303</b>	<b>275</b>	<b>28</b>

- 2.4** Table 2 shows the number of comments made based on legal compliance.

1 Of these, 53 are about Foxdenton (including 48 multiples), 19 are about OPOL in Policy 22 and 22 are site-specific comments submitted by Chorlton Planning. This leaves only 29 objections against the rest of the Joint DPD.

**Table 2 Number of representations based on legal compliance**

	Number of representations that consider the plan legally compliant	Number of representations that consider the plan not legally compliant	Number of representations that made no comment on the plan's legal compliance
Total Representations received	60	2	241
Representations received within the consultation period	60	2	213
Representations received after the consultation period	0	0	28

**2.5** Table 3 shows the number of comments based on soundness.

**Table 3 Number of Representations relating to soundness**

	Total Representations received	Representations received within the consultation period	Representations received after the consultation period
Number of representations that consider the plan sound	130	130	0
Number of representations that do not consider the plan sound because it is not - Justified	117	115	2
Number of representations that do not consider the plan sound because it is not - Effective	47	45	2
Number of representations that do not consider the plan sound because it is not - Consistent with National Policy	43	41	2
Number of representations that made no comment on the soundness of the plan	50	24	26

**2.6** The number of representations that do not consider the plan sound because it is not justified, effective and consistent with national policy has been affected by general letters regarding Foxdenton and 22 site-specific comments submitted by Chorlton Planning. The method used to record comments regarding Foxdenton is set out below. This has had the affect of increasing the number of objections, particularly those that do not consider the plan to be sound because it is not justified, which would otherwise be much lower.

### Foxdenton

**2.7** A number of individuals submitted comments questioning the need for a business and employment area here. GMPTE stated it wanted to be listed as one of the agencies to be involved in bringing forward the delivery of Foxdenton.

**2.8** Fourteen respondents submitted comments about Foxdenton. Of this seven respondents submitted general letters. Given the nature of these letters, for completeness we have taken the decision to record their comments against the 12 parts of the Joint DPD where Foxdenton is mentioned<sup>(2)</sup>. This has had the effect of increasing the number of comments recorded about Foxdenton. One of the fourteen respondents (Chorlton Planning) submitted two supporting comments (against the Vision and Policy 14) on behalf of 29 clients although this has been recorded under Chorlton Planning's name rather than the 29 individuals/organisations for completeness.

**2.9** Table 4 shows the number of respondents, the number of comments and the nature of the comments received in relation to Foxdenton.

**Table 4 Comments submitted regarding Foxdenton**

Nature of comment	Number of respondents	Number of comments
Support	6	18
Objections	6	52
General comments	2	24
<b>Total</b>	<b>14</b>	<b>94</b>

### Other Protected Open Land (OPOL)

**2.10** A number of individuals submitted comments questioning the policy wording compared to that in the UDP. (Please note: in light of these comments a minor amendment has been proposed to improve the legibility of the policy).

2 General letters about Foxdenton have been recorded against the following sections of the Joint DPD: Introduction & Spatial Portrait; Vision; Objectives; Preferred Way Forward; Key Diagram; Policies 1, 4, 13, 14, 18, 21; and Appendix 4

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## **3 Summary of the main issues raised in relation to the Proposed Submission**

- 3.1** Table 5 is a summary of the comments received during the publication stage. It lists the main objections rather than the supports. The comments are listed in the order of the chapters of the Joint DPD and its supporting documents (the Sustainability Appraisal, the Habitats Regulations Assessment and the background papers). (Please note the reference number shown refers to that on the Objective/Limehouse representations database, not the Examination full representation number.)

**Table 5 Summary of the comments received during publication stage**

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS16; PS45; PS105; PS63; PS84; PS259; PS287;	Introduction and Spatial Portrait	<ul style="list-style-type: none"> <li>• Objections, support and general comments regarding Foxdenton business and employment area.</li> </ul>
PS17; PS46; PS108; PS65; PS86; PS136; PS260; PS288; PS273; PS277; PS279	Vision	<ul style="list-style-type: none"> <li>• Objections, support and general comments regarding Foxdenton business and employment area.</li> <li>• Objection to Green Belt being maintained.</li> <li>• Objection regarding the protection of Cowlshaw as Other Protected Open Land (OPOL).</li> <li>• Objection requesting the plan to allow for the significant expansion of Denshaw.</li> </ul>
PS169; PS274; PS276; PS241	Vision	<ul style="list-style-type: none"> <li>• Objection to the use of the word 'respecting' with regard to environmental assessments in the Vision and it being out of step with National Policy.</li> <li>• Objection relating to housing requirement and the split of housing across the borough.</li> <li>• Comment that the Vision needs to be 'development led'.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS30;PS18; PS47; PS109; PS66; PS87;PS261; PS289;	Objectives	<ul style="list-style-type: none"> <li>• Objections, support and general comments regarding Foxdenton business and employment area.</li> </ul>
PS243; PS280; PS197; PS245	Objectives	<ul style="list-style-type: none"> <li>• Query the precise percentages of homes to be built in the districts of the borough in SO2f. More flexibility should be built into this and recommends that live/work units should be referred to in this section.</li> <li>• Objection to SO4 regarding Green Belt boundaries.</li> <li>• General comment on SO5i that promoting the borough's image should be given a higher profile.</li> </ul>
PS19; PS48; PS110; PS67; PS88; PS262; PS290	The Preferred Way Forward for the LDF	<ul style="list-style-type: none"> <li>• Objections, support and general comments regarding Foxdenton business and employment area.</li> </ul>
PS20; PS49; PS111; PS68; PS89; PS263; PS291;	Key Diagram	<ul style="list-style-type: none"> <li>• Objections, support and general comments regarding Foxdenton business and employment area.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS21; PS50; PS112; PS69; PS79; PS91; PS264; PS292; PS104; PS198.	Policy 1 Climate Change and Sustainable Development	<ul style="list-style-type: none"> <li>• Objections, support and general comments regarding Foxdenton business and employment area.</li> <li>• Disappointed that adaptation and mitigation against climate change has not followed through into the proposals attached to this policy.</li> <li>• Request for text to be added to Paragraph 5.28 on health and well being benefits of green infrastructure.</li> <li>• Objection relating to the maintenance of Green Belt and OPOL.</li> </ul>
PS257; PS251	Policy 2 Communities	<ul style="list-style-type: none"> <li>• Sport England make comments regarding the protection and enhancement of indoor sports facilities and general community facilities.</li> <li>• Natural England highlight the links between health and the environment and suggests that these links should be emphasised through Policy 2.</li> </ul>
PS221; PS234	Policy 3 An Address of Choice	<ul style="list-style-type: none"> <li>• Would like more flexibility in promoting sites for residential development that may not be identified within the first 5 years of the plan.</li> <li>• Objection to Policy 3 regarding the distribution of housing.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS11; PS23; PS51; PS114; PS70; PS92; PS265; PS293	Policy 4 Promoting Sustainable Regeneration and Prosperity	<ul style="list-style-type: none"> <li>Objections, support and general comments regarding Foxdenton business and employment area.</li> </ul>
PS149	Policy 5 Promoting Accessibility and Sustainable Transport Choices	<ul style="list-style-type: none"> <li>Suggestion that a statement on park and ride could be included.</li> </ul>
PS58; PS102; PS80	Policy 6 Green Infrastructure	<ul style="list-style-type: none"> <li>Comments on clarifying how developers are expected to comply with the policy and suggest the policy is amended by deleting 'Development proposals, where appropriate, must:' and inserting 'Oldham's green infrastructure network will be enhanced through measures which:'.</li> <li>Request reference in paragraph 5.73 to wider ecosystem services benefits of green infrastructure.</li> <li>Disappointed not referred to Natural England Accessible Natural Greenspace Standard.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS126; PS156	Policy 9 Local Environment	<ul style="list-style-type: none"> <li>Reference to Low Emissions Strategy has not been included but is not considered critical.</li> <li>Comment that the overall policy wording is rather negative. Suggests some revisions to the text.</li> </ul>
PS77; PS225	Policy 10 Affordable Housing	<ul style="list-style-type: none"> <li>Objection to Foxdenton business and employment area. Objection to the affordable housing requirement.</li> </ul>
PS281; PS282; PS283	Policy 11 Housing	<ul style="list-style-type: none"> <li>Would like text re-worded in paragraph (b) to include reference to the Saddleworth villages as it does in the Vision.</li> <li>Objection to the classification of gardens as 'greenfield'</li> <li>General comment on Policy 11 regarding the inclusion of live/work units.</li> </ul>
PS228; PS223	Policy 12 Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> <li>Suggest amendment to paragraph 6.37 to read: "Regard must be had to other policies in the joint DPD, for instance Policies 1, 6, 21, 22, 23 and 24."</li> <li>Objection to Policy 12 not identifying pitch numbers.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS13; PS24; PS32; PS52; PS115; PS71; PS93; PS266; PS294; PS12; PS25;	Policy 13 Employment Areas	<ul style="list-style-type: none"> <li>Objection, support and general comments regarding Foxdenton business and employment area.</li> </ul>
PS33; PS53; PS116; PS94; PS267; PS295	Policy 14 Supporting Oldham's Economy	<ul style="list-style-type: none"> <li>Request for 40% of the area to come forward for residential development rather than the 25% proposed.</li> <li>Objection, support and general comments regarding Foxdenton business and employment area.</li> </ul>
PS141; PS302	Policy 14 Supporting Oldham's Economy	<ul style="list-style-type: none"> <li>Would like a further exception adding to the list of exceptions. A paragraph (d) is suggested which should say:- "The site is no longer suitable or appropriate for employment generating uses due to its adverse effect on surrounding land and property due to the noise, pollution or traffic generated."</li> <li>Request for reference to GMPT E be added to the policy.</li> </ul>
PS142	Policy 15 Centres	<ul style="list-style-type: none"> <li>Difficult to accept the reference to prove need for a proposal in section (a) Food, Drink and Nighttime economy. Suggests a masterplan maybe necessary to promote areas where the night time economy is already established and to encourage uses in some areas and not in others may be the way forward.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS143	Policy 16 Local Services and Facilities	<ul style="list-style-type: none"> <li>Support for the intention behind Policy 16 but feels it is too prescriptive. Suggests a SPD be produced to refine it.</li> </ul>
PS303	Policy 17 Gateways and Corridors	<ul style="list-style-type: none"> <li>General comment suggesting further text that could be added to paragraph 6.88 regarding the Northern Hub.</li> </ul>
PS26; PS54; PS117; PS74; PS81; PS268; PS296; PS161	Policy 18 Energy	<ul style="list-style-type: none"> <li>Objections and general comment regarding Foxdenton business and employment area.</li> <li>Support for Policy 18 but points out that a sequential approach to conserving our most valued environmental assets may not have been applied in this policy.</li> <li>Qualified support for carbon reduction subject to the merits of each individual development proposal being considered.</li> </ul>
PS82; PS301	Policy 19 Water and Flooding	<ul style="list-style-type: none"> <li>Support for Policy 19 but consider the policy to be limited in the way it deals with water pollution and quality and could mention Rochdale Canal SAC/SSSI.</li> <li>General comment regarding the sewer network and drainage.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS246; PS212	Policy 20 Design	<ul style="list-style-type: none"> <li>Qualified support for Policy 20 - feels there could be an over emphasis on design.</li> <li>Request text added regarding 'unstable land'.</li> </ul>
PS27; PS55; PS118; PS75; PS106; PS83; PS203; PS269; PS297	Policy 21 Protecting Natural Environmental Assets	<ul style="list-style-type: none"> <li>Objection and general comments regarding Foxdenton business and employment area.</li> <li>Request replacing the word "balancing" with suggested text, so it reads: "New development and growth pressures must be accompanied by the protection, conservation and enhancement of our..."</li> <li>Comments made about the need to avoid loss before mitigation, making reference to the operations which may damage the special conservation interest of the canal and moving reference to canal and river side regeneration to an employment policy.</li> <li>Comment made about landscape character and meeting developer needs.</li> </ul>
PS10; PS44; PS61; PS62; PS41; PS57; PS37; PS59; PS60; PS40; PS120; PS99; PS90; PS64; PS72; PS78; PS85; PS98; PS157; PS158; PS163; PS204	Policy 22 Protecting Open Land	<ul style="list-style-type: none"> <li>Objection to the release of OPOL and LRFD at Foxdenton.</li> <li>Object to wording of Policy 22 on OPOL.</li> <li>Consider minor changes to Green Belt are needed and do not consider all OPOL should be carried forward.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS258; PS253	Policy 23 Open Spaces and Sports	<ul style="list-style-type: none"> <li data-bbox="406 1086 478 1422">Sport England suggest it should include a commitment to update the council's Playing Pitch Strategy.</li> <li data-bbox="502 1086 614 1422">Points are highlighted regarding: how the council will update open space figures in the Joint DPD in the future; the protection of playing fields; and whether point 'g' of the policy complies with PPG17.</li> <li data-bbox="638 1086 678 1422">Natural England ask that the council take into account geodiversity.</li> </ul>
PS248	Policy 24 Historic Environment	<ul style="list-style-type: none"> <li data-bbox="774 1086 805 1422">Qualified support for Policy 24 - requests additional text.</li> </ul>
PS160	Policy 25 Developer Contributions	<ul style="list-style-type: none"> <li data-bbox="893 1086 925 1422">Greater clarity requested on policy wording.</li> </ul>
PS134	Appendix 1 Monitoring Framework	<ul style="list-style-type: none"> <li data-bbox="1029 1086 1093 1422">General comment about the monitoring indicators. Though they have noted that Oldham are committed to working with the Agency in the future so this is not seen as critical.</li> </ul>
PS28; PS56; PS119; PS76; PS97; PS270; PS298	Appendix 4 Proposals Map changes	<ul style="list-style-type: none"> <li data-bbox="1189 1086 1252 1422">Objection, support and general comments regarding Foxdenton business and employment area.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS219; PS240; PS208; PS226; PS206; PS216; PS217; PS231; PS232	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Site specific comments. Request for land at Spinners Way and Alderney Farm; Former Woodbrook Farm, Woodbrook, Springhead; land at Denshaw Vale, Denshaw; land off Waterworks Road/Holgate Street, Waterhead; land off Redwood Road/Higher Shaws, Uppermill; land at Paulden Farm, Waterhead; land at Alderney Farm, Ripponden Road; Hodge Clough Farm, Wilkes Street; land around Wilkes House and Hodge Clough Farm, Wilkes Street; to be released from the Green Belt and reallocated for residential development.</li> </ul>
PS227	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Site specific comment. Request land at Stoneswood Farm, Huddersfield Road, Delph be released from OPOL or Green Belt designation and reallocated either wholly or in part for residential development.</li> </ul>
PS224; PS209; PS207; PS229; PS222; PS230	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Site specific comment. Request land at Cowlshaw, Royton/Shaw; land off Denbigh Drive, Shaw; land at Rumbles Lane, Delph; land at Radcliffe Street, Springhead; Springhead Quarry, Cooper Street, Springhead; land off Ryefields Drive, Uppermill; be released from OPOL designation and reallocated either wholly or in part for residential development.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS250	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Site specific comment. Request land off Ashes Lane, Springhead be allocated for residential development.</li> </ul>
PS214; PS233	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Site specific comment. Request land at Poplar Avenue, Lydgate be limited infill of Green Belt; and land at Temple Bar Farm, Wall Hill Road, Dobcross be released from the Green Belt or treated as a settlement within the Green Belt identified for limited infill.</li> </ul>
PS244	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Objection regarding the omission of tourism from the document.</li> </ul>
PS205	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Site specific comment. Request land off Huddersfield Road, Oldham be released from PEZ.</li> </ul>
PS299	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Site specific comment. Request the Star Inn, Failsworth be considered for development.</li> </ul>

Comment ID	Part of Proposed Submission document the comment relates to	Summary of comments received
PS300	Oldham LDF: Joint DPD - Proposed Submission	<ul style="list-style-type: none"> <li>Site specific comment. Request site at Horseshoe Lane, Chadderton be developed for residential development as part of the development of Foxdenton.</li> </ul>
PSHRA1	Habitats Regulations Assessment	<ul style="list-style-type: none"> <li>Comments made regarding stressing the need to avoid impacts on the SAC in the first place.</li> <li>Minor changes requested regarding making it clear which plan and site is being referred to in Appendix 3 and amending the Regulations.</li> </ul>