Oldham Local Plan

Draft Local Plan: Economy and Employment (including Tourism) Topic Paper



December 2023

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1. Introduction and Purpose

- 1.1. This is the Economy and Employment Topic Paper and is one of ten topic papers produced to inform the consultation on the Oldham Local Plan: Draft Plan.
- 1.2. All of the papers can be found on the Oldham Council website.
- 1.3. The topic papers set out how the preferred option for each policy under the relevant Draft Local Plan 'Chapter' has been developed. As such, the topic papers support and complement the Draft Plan consultation document as they provide a detailed explanation of the basis for each preferred policy approach. The policies are presented in a consistent format in each paper with sufficient information to provide a comprehensive appreciation of the background to, and development of, the preferred option.
- 1.4. The topic papers set out the national, regional and local planning context and then for each policy, or group of policies where relevant, the topic paper details how comments received to the Issues and Options consultation and relevant evidence have helped to shape the proposed policy approach. Including how this has also been informed by the findings of the Integrated Assessment. There are also details of further work that may be required to inform the next stage of the plan-making process the Regulation 19 Publication Plan.
- 1.5. The preparation of a Local Plan must be informed by consultation and engagement as well as statutory processes, such as Integrated Assessment and Habitats Regulations Assessment, and address the requirements of national planning policy. These important elements of plan-making have, therefore, informed development of the Draft Local Plan and helped to shape the proposed policy approach. These supporting documents are available to view on the Oldham Council website.

2. Context

2.1. This section sets out the key national planning policies that relate to the economy and employment and which have informed the policy approach taken. It also looks at the regional context – in the main this is the Places for Everyone Joint Development Plan, however there may be other policies and programme of relevance, and local policies and programmes in particular how the policy or policies will help to Create a Better Place.

National

National Planning Policy Framework (Department for Levelling Up, Housing and Communities, December 2023)

- 2.2. <u>National Planning Policy Framework</u>¹ (NPPF) says in paragraph 85 that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It goes on to say that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 2.3. Paragraph 86 lists that planning policies should:
 - set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
 - set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
 - be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
- 2.4. Paragraphs 88 and 89 set out how planning policies can support the rural economy including through enabling:
 - the sustainable growth and expansion of all types of businesses in rural areas;
 - the development and diversification of agricultural and other land-based rural businesses;
 - sustainable rural tourism and leisure developments which respect the character of the countryside; and
 - the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 2.5. Also key for employment, and other sites, is Chapter 11 on making 'Effective Use of Land.' Paragraph 126 states where there is no reasonable prospect of an application coming forward for the allocated use, local planning authorities should:
 - as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
 - in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

¹ This document can be found at:

https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.p

Planning Practice Guidance Housing and Economic Land Availability Assessment (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, July 2019)

- 2.6. This <u>planning practice guidance</u>² states that the assessment of land availability is an important step in the preparation of the Local Plan. The NPPF identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for the use which is most appropriate. The assessment should identify and assess sites with potential for development (including availability and achievability).
- 2.7. This approach ensures that all land is assessed together as part of plan preparation to identify which sites or broad locations are the most suitable and deliverable for a particular use. The guidance includes methodology for carrying out the assessment of sites, including a suggested size threshold, information on how to identify sites, what types of data to look at, what to include in a site survey and what characteristics to record during the survey.
- 2.8. The guidance says that at the end of the assessment the core outputs should be:
 - a list of all sites considered, cross-referenced to their locations on maps;
 - an assessment of each, in terms of its suitability, availability and achievability (including whether it is viable) to determine whether a site is realistically expected to be developed and when;
 - more detailed information for sites which are considered realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
 - the type and quantity of development that could be delivered on site, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
 - an indicative trajectory of anticipated development and consideration of risk.
- 2.9. There is no formal requirement for an annual update of employment (including retail, office, manufacturing) site allocations, they should be regularly reviewed.

Planning Practice Guidance Housing and Economic Development Needs Assessment (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, December 2020)

- 2.10. This <u>planning practice guidance</u>³ outlines what evidence may be needed as part of Local Plan evidence base. To plan for businesses it says plan-making authorities need to assess:
 - the best fit functional economic market area;
 - the existing stock of land for employment uses within the area;
 - the recent pattern of employment land supply and loss for example based on extant planning permissions and planning applications (or losses to permitted development);
 - evidence of market demand (including the locational and premises requirements of particular types of business) – sourced from local data

² This guidance can be found at: <u>https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment</u>

³ This guidance can be found at: <u>https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments</u>

and market intelligence, such as recent surveys of business needs, discussions with developers and property agents and engagement with business and economic forums;

- wider market signals relating to economic growth, diversification and innovation; and
- any evidence of market failure such as physical or ownership constraints that prevent the employment site being used effectively.
- 2.11. It goes on to say that policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as:
 - sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand);
 - demographically derived assessments of current and future local labour supply (labour supply techniques);
 - analysis based on the past take-up of employment land and property and/or future property market requirements;
 - consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand; and
 - monitoring of business, economic and employment statistics.
- 2.12. It further explains how market demand be analysed, employment land requirement be derived, and the need for logistics can be assessed.

The Path to Sustainable Farming: An Agricultural Transition Plan 2021 to 2024 (Department for Environment, Food and Rural Affairs, 2020)

2.13. <u>The Path to Sustainable Farming: Agricultural Transition Plan 2021-2024</u>⁴ outlines that by 2028, the government wants to see: a renewed agricultural sector, producing healthy food for consumption at home and abroad, where farms can be profitable and economically sustainable without subsidy; and farming and the countryside contributing significantly to environmental goals including addressing climate change. It will be important that the Local Plan can support the agricultural sector and recognise that there may be circumstances in which farms need to create additional income by promoting other business opportunities.

⁴ This document can be found at:

https://assets.publishing.service.gov.uk/media/60085334e90e073ec94cc80b/agricultural-transition-plan.pdf

Regional

Places for Everyone (PfE) Joint Development Plan Document (DPD) (Greater Manchester Combined Authority (GMCA), Composite Version, September 2023)

- 2.14. The <u>Places for Everyone (PfE) Joint Development Plan Document (DPD)</u>⁵, is a strategic plan that will, upon adoption, cover nine of the ten Greater Manchester districts Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Plan:
 - Provides the strategic framework for the Oldham Local Plan;
 - Sets out specific requirements to be taken forward through the Oldham Local Plan in relation to housing, offices, and industry and warehousing, and identifies the main areas where this will be focused;
 - Identifies the important environmental assets which will be protected and enhanced;
 - Allocates sites for employment and housing outside of the urban area in Oldham this is JPA2 Stakehill, JPA12 Beal Valley, JPA13 Bottom Field Farm, JPA14 Broadbent Moss, JPA15 Chew Brook Vale, JPA16 Cowlishaw, JPA17 Land south of Coal Pit Lane' and JPA18 South of Rosary Road;
 - Supports the delivery of key infrastructure, such as transport and utilities; and
 - Defines a new Green Belt boundary for the borough.
- 2.15. Upon adoption PfE will form part of the development plan for Oldham. PfE will set the strategic policies and direction for the borough. Oldham's Local Plan will interpret these at a more detailed local level to reflect our priorities and support delivery of the council's regeneration ambitions and Creating a Better Place.
- 2.16. When considering development proposals and what needs to be taken account of in the determination of planning applications regard must therefore be had to both PfE and Oldham's Local Plan.
- 2.17. The spatial strategy centres around inclusive growth. To the north of the city region this is around creating more favourable conditions for growth by providing high-quality investment opportunities across the plan area that helps to reduce disparities.
- 2.18. The most relevant PfE policies relating to the economy and employment are:
- 2.19. **Policy JP-Strat 6: Northern Areas** states a significant increase in the competitiveness of the northern areas will be sought. There will be a strong focus on making as much use of brownfield land through urban regeneration, enhancing the role of the town centres, complemented by the allocation of sites for development that will help to boost economic opportunities and diversify housing provision.

⁵ This document can be found at: <u>https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</u>

- 2.20. **Policy JP-Strat7: North-East Growth Corridor** proposes as part of the wider corridor a major site within Oldham (cross-boundary with Rochdale) called Stakehill. The North-East Growth Corridor will deliver a nationally significant area of economic activity supported by a significant increase in the residential offer delivering truly inclusive growth over the lifetime of the Plan.
- 2.21. Chapter 6, 'Places for Jobs' includes several policies concerned with supporting economic growth in Greater Manchester. Policy JP-J1 'Supporting Long-Term Economic Growth' states that a thriving, inclusive and productive economy will be sought in all parts of Greater Manchester. It states the emphasis will be on:
 - Maintaining a very high level of economic diversity across our boroughs;
 - Facilitating the development of high value clusters in key economic sectors;
 - Making the most of major assets of the sub-region;
 - Grasping the economic opportunities from the global transition to a low carbon economy;
 - Providing the high-quality, sustainable living environments that will help to attract and retain skilled workers;
 - Supporting local job growth, by seeking agreement with employers and developers, including housebuilders, to enter into local labour and training agreements through planning obligations and other mechanisms where appropriate; and
 - Maximising the potential of the key growth locations to deliver inclusive growth across the sub-region by ensuring that employment growth opportunities are well connected and accessible to all residents.
- 2.22. **Policy JP-J2: Employment Sites and Premises** states that a 'diverse range of employment sites and accessible premises, both new and second-hand, will be made available across the Plan area in terms of location, scale, type and cost. This will offer opportunities for all kinds and sizes of businesses, including start-ups, firms seeking to expand, and large-scale inward investment which will help to tackle inequalities'. It also states that, existing employment areas that are important to maintaining a strong and diverse supply of sites and premises throughout our borough's will be protected from redevelopment to other uses and nurtured to ensure they remain competitive and their accessibility improved where necessary. It states that this will include local employment areas as well as key growth locations.
- 2.23. **Policies JP-J3: Office Development** and **JP-J4: Industry and Warehousing Development** outline the amount of office, industry and warehousing floorspace that will be provided across the Plan area over the period 2022-2039. Table 6.1 of PfE sets out that Oldham has a supply 81,998sqm of office floorspace and Table 6.2 states that Oldham has a supply 278,922sqm of industrial and warehousing floorspace for the plan period.
- 2.24. **Policy JP-P3: Cultural Facilities** states that through PfE 'we will proactively develop and support cultural businesses and attractions in our cities and towns through a range of measures, where appropriate'. The list of measures include supporting new cultural venues in town centres, stimulating vibrancy and vitality and promoting

diversity in town centres and considering the identification of 'Creative Improvement Districts' where there is evidence it will enhance the local economy and provide facilities and workspace for the creative industries.

Greater Manchester Local Industrial Strategy (GMCA , the Greater Manchester Local Enterprise Partnership and the UK Government, 2019)

- 2.25. Greater Manchester's Local Industrial Strategy (LIS) is underpinned by a shared understanding of the place and its people and is designed to enable the city-region to go further and faster towards its ambitions than ever before, while meeting key national objectives. It states that key to the success of the LIS will be strengthening the city-region's foundations of productivity and ensuring that growth benefits all people and places. The Industrial Strategy is centred around two key aspects:
- 2.26. Five foundations of productivity
 - Ideas;
 - People;
 - Infrastructure;
 - Business Environment; and
 - Places.
- 2.27. Four Grand Challenges
 - Health Innovation;
 - Advanced Materials and Manufacturing;
 - Digital, Creative and Media; and
 - Clean Growth.
- 2.28. Oldham's largest sector is Health and Social Care (14.2% jobs), with Manufacturing being the 3rd largest sector (11.5%) which has potential to support the first two Grand Challenges. The growth in construction sector, linked to the new Oldham College Construction School will support the Clean Growth Grand Challenge.
- 2.29. The Greater Manchester LIS is a long-term plan which will aim to develop increased productivity and wealth creation across Greater Manchester. The strategy states that: By 2040, Greater Manchester will aim to have secured:
 - increased productivity and pay across sectors, particularly where they are currently behind national averages, driven by businesses which are well led and managed, innovative and trading and investing globally;
 - a greater number of high-quality manufacturing opportunities in strategic sites across the city-region, giving a more productive manufacturing base close to transport links and population centres;
 - a fully integrated and digitalised health and care system, creating and adopting the latest in preventative and assistive health technology, and
 - helping people stay in the labour market and stay productive for longer.

Marketing Manchester (on-going)

- 2.30. Marketing Manchester is the agency charged with promoting Greater Manchester nationally and internationally as a place to visit, invest, meet and study. The strategy dovetails with the Greater Manchester Strategy and the Greater Manchester Internationalisation Strategy which has a vision for Manchester to be a Top 20 global city by 2035. The priorities of Marketing Manchester are to:
 - Promote Greater Manchester on a national and international stage:
 - to leisure visitors, providing them with inspiration and information to visit
 - by identifying, bidding, securing and supporting, business conferences and events
 - Influence investors in our key sectors to set up and grow their businesses in our city-region.
 - Strive to be an exemplar Destination Management Organisation.
- 2.31. Marketing Manchester does the following:
 - Supports the inward investment promotional agency, MIDAS on frontier sector marketing, and Greater Manchester's Business Board on the city-region's economic vision.
 - Promotes Greater Manchester's visitor economy to both domestic and international audiences and markets.
 - Has supported Greater Manchester's place promotion, capital investment, and real estate ambitions for over 20 years, helping to facilitate important discussions about infrastructure, housing, innovation, equality, and sustainability.
 - Promotes Greater Manchester as a leading city in which to hold major conference, convention, or sport events.
 - Promotes Greater Manchester's frontier sectors, including digital, innovation and green, to national and international investors.

Local

The Oldham Plan 'Our Future Oldham – A Shared Vision for 2030 (Oldham Council, 2022)

- 2.32. The Oldham Plan 'Our Future Oldham A Shared Vision for 2030'⁶, prepared by the Oldham Partnership, sets the direction for the borough. With a focus on 'resident first', the Plan seeks to ensure that residents are at the heart of decision-making.
- 2.33. Consultation carried out to inform preparation of The Oldham Plan found that residents want services close to home and tailored to meet the specific needs of their community. The contributions emphasise a desire for Oldham to be a clean, green and safe place where public transport allows access to opportunities, activities for young people and communities and where people felt part of the city region.
- 2.34. The main aim of the Oldham Partnership, through the Plan, is to 'uplift every resident', so that we all have:

- A well-rounded, enriching, life-long education
- The opportunity to get a decent job that pays well and offers security and flexibility
- Quick, cheap and easy transport to every part of the city region
- A home that is affordable, well-maintained and appropriate
- Timely access to vital services to keep people healthy and safe
- A clean, green and healthy environment
- Diverse opportunities to get together, with regular activities to boost physical and mental health and community spirit
- A local area that meets people's needs and makes them proud

Oldham Council Corporate Plan 2022 – 2027 (Oldham Council, 2022)

- 2.35. The Oldham Council Corporate Plan 2022-27⁷ sets out the council's priorities, with specific actions for 2022-25. It works in parallel with The Oldham Plan and sets out what its priorities mean for Oldham:
 - · Healthy, safe and well supported residents
 - · A great start and skills for life
 - · Better jobs and dynamic businesses
 - · Quality homes for everyone
 - · A clean and green future
- 2.36. Delivering against these priorities means that the council can help residents and make Oldham the best place it can be.
- 2.37. In relation to 'Better jobs and dynamic businesses' the Plan sets out a number of actions. These are:
 - Deliver on our plans for a renewed purpose for Oldham Town Centre as a creative place with a vibrant night-time and cultural economy, more jobs and homes
 - Improve the approach to supporting and engaging local businesses
 - Increase the amount the council spends with local companies and suppliers
 - Deliver a more ambitious and proactive approach to place marketing
 - Support residents into work through our range of Get Oldham Working initiatives
 - Deliver a transport strategy to open up a wide range of jobs and other opportunities for Oldham people across the city region and beyond

⁷ This document can be found at: <u>https://www.oldham.gov.uk/downloads/file/7405/oldham_corporate_plan_2022-27</u>

• Develop a new employment and skills strategy and Oldham Skills Plan for the borough

Creating a Better Place

2.38. The Local Plan represents the spatial expression of The Oldham Plan and the council's Corporate Plan. Their aspirations and priorities are the golden thread that runs through the Plan, along with supporting and facilitating the delivery of the council's ambitious Creating a Better Place agenda which is embedded into the planning framework provided through the policies as illustrated in Figure 1 below.

Figure 1: Flow diagram illustrating how the council's Creating a Better Place agenda has been embedded into the planning framework



- 2.39. Through delivering Oldham Council's bold vision for Oldham Town Centre and the wider borough and the ambitions of Creating a Better Place by 2030 Oldham will be a place where business and enterprise can thrive and where people will want to live, visit, relax and work.
- 2.40. Building on its industrial heritage, civic pride and location as a gateway into the countryside, Oldham will have a sustainable future in a unique urban setting. Oldham will be a stronger economic contributor to Greater Manchester, providing a place where every resident is enabled to contribute to and benefit from the continued growth of the city region.

- 2.41. Underneath the overarching theme of Creating a Better Place there sits several key issues that policies within the Local Plan seek to address such as the creation of healthy communities and tackling the climate emergency.
- 2.42. The policies set out within the Local Plan also provide a robust framework for ensuring that all development proposals mitigate the impact of climate change, make their contribution to meeting nationally binding targets to reduce greenhouse emissions and increase resilience. Policies relating to economy and employment will help promote the economic transformation of Oldham and diversify our economy.

3. Consultation Feedback

Regulation 18 Notification Consultation

- 3.1. To begin preparation of the Local Plan the council carried out a 'Regulation 18' notification between July and August 2017.
- 3.2. To inform this work we asked what the local community and stakeholders thought:
 - the Local Plan should contain and what the key planning issues are for Oldham; and
 - what, in broad terms, should be the main aims of the Local Plan.
- 3.3. In addition, we published our Integrated Assessment Scoping Report and invited the Environment Agency, Historic England and Natural England to comment on the scope of the Local Plan. This was also available for the local community and stakeholders to view and comment on if they wished.
- 3.4. The main messages that came out of the Regulation 18 Notification consultation regarding the economy and employment were:
 - Need to rethink the industrial strategy, considering the location to Manchester.
 - Oldham doed not need more warehouses.
 - The need for job creation and economic growth that matches growing sectors.
 - Support digital businesses.
 - Need a range of employment sites in suitable locations.
 - Support small businesses and technology companies in Saddleworth.

Regulation 18 Issues and Options Consultation

- 3.5. The Oldham Local Plan: Issues and Options consultation in 2021 identified the economy as one of the key themes for the new Local Plan to address.
- 3.6. The consultation identified the following key issues:
 - Oldham has failed to benefit fully from growth at a Greater Manchester level. There is a need to plan for future employment needs in order to be a key economic contributor to Greater Manchester, to provide a place where business and enterprise can thrive and where people will want to live, visit and work.
 - Oldham has a higher percentage of working age population that have no qualifications than Greater Manchester and nationally and Oldham's employment rate is the third lowest in Greater Manchester.
 - There is 186,471sqm of mill floorspace vacant or underused in Oldham equating to 18.97% of the total industrial/commercial floorspace. This needs to be put to better use.

- There is significant pressure on Oldham's existing employment areas to be released for the development of other uses (including housing).
- Oldham's key potential growth sectors are: Construction; Health and Social Care; Digital Industries (including creative industries); Business and Professional Services; Manufacturing sub sectors; and Logistics. Sites are needed to accommodate the start-up, growth and expansion of these sectors.
- There is a need to ensure that the digital infrastructure in the borough, such as electronic communications, is modern and fit for purpose to assist Oldham in achieving economic growth.
- 3.7. As part of the consultation we asked you:
 - Do you have any comments on the designated Business and Employment Areas (BEAs) or Saddleworth Employment Areas (SEAs)?
 - Should we have a tiered approach to the protection of our BEAs and SEAs. So, sites that are considered 'best' in relation to our key growth sectors have no exceptions ensuring they can only be used for their designated uses?
 - If a tiered approach is implemented, should we then we restrict the uses permitted within some of the BEAs and SEA's considered 'best' in relation to our key growth sectors?
 - Is there an alternative approach in relation to how we protect our 'best' employment areas?
 - Should we protect all the existing BEAs and SEAs under the same policy, allowing a number of exceptions where the sites can be used for alternative uses?
 - Should the SEA's have a different policy to the BEAs (in relation to the uses permitted within them and / or the level of protection they have) to reflect their location within the Saddleworth villages and /or their contribution to the local economy?
 - Should we have no protection over our employment areas and let the market decide what uses should go on the sites?
 - Do you have any views on any of the saved UDP employment allocations.
 - How do you think that Oldham can build on its tourism base?
 - Should Oldham allocate sites for tourism uses such as land for hotels to help boost the visitor economy?
 - How can tourism be promoted in a sustainable manner?
 - Do you think Oldham should continue to have a policy that supports the diversification of the rural economy?
- 3.8. A Spatial Option was also asked, this was:

"Options in relation to allocating employment land are:

- A. To focus more on the sustainable connectivity to our existing employment sites and neighbouring districts key employment sites; or
- B. A combination of providing some new employment land and improving sustainable connectivity to existing and neighbouring districts key employment sites."

3.9. We have reviewed the responses you gave us, and you will find the issues raised in relation to design summarised in this topic paper below.

4. Economy and Employment and the Draft Local Plan

4.1. Key policy areas have been identified that are addressed in this topic paper. For each of these, further detail is provided on how comments received to the Issues and Options consultation and relevant evidence have helped to shape the proposed policy approach and how this has also been informed by the findings of the Integrated Assessment. There are also details of further work that may be required to inform the next stage of the plan-making process – the Regulation 19 Publication Plan.

5. Policy E1 Business and Employment Areas and Policy E2 Exceptions within Business and Employment Areas and other existing employment sites

Feedback from Issues and Options consultation

5.1. The consultation responses at Issues and Options stage in relation to the approach towards the designated employment areas were mixed. Some respondents were supportive of a flexible policy approach regarding the BEAs and SEAs, other respondents thought that each site should be considered on its own merits and some comments were submitted around individual designated employment areas around their availability and potential future uses.

Issues to be addressed

5.2. There is the need to ensure the Local Plan provides a positive framework so that Oldham has a range of sustainable sites to support the local economy.

Evidence Base

5.3. Oldham's adopted Local Plan (the Joint DPD) there are 23 Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) designated in policies 13 and 14. As part of this draft Local Plan there has been a review of the designations and boundaries of the BEAs and SEAs in order to reflect any significant developments that may have taken place contrary to the list of employment uses within Policy 14. It is important to carry this audit of the BEAs and SEAs boundaries to provide an up to date and accurate picture of Oldham's employment land and premises offer and ensure the boundaries are appropriate to take account for any developments that may have been permitted under the exceptions part of Policy 14 (such as housing or larger scale retail).

5.4. The plans of the boundaries and the recommendations for each employment area can be found in Appendix 1 of Oldham's Draft Employment Land Review. Table 1 below shows the recommendations for the BEAs and SEAs going forward in the Local Pan. Table 1 below shows the recommendations for the BEAs and SEAs going forward in the Local Plan.

Business and Employment Area / Saddleworth Employment Area	Recommendation for Draft Local Plan
BEA 1 Wrigley Street	This BEA is located in Failsworth East and measures 3.69 hectares (ha). There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as an employment area.
BEA 2 Hawksley Street	This BEA is located in Hollinwood and measures 5.26 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as an employment area.
BEA 3 Greengate/Broadgate	This BEA is located in Chadderton Central and Chadderton South and measures 185.89 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. If the Foxdenton employment area is amended to reflect the Broadway Green developments the land remaining could be added to this BEA as it forms a more natural boundary. Remain as an employment area and potentially add land from Foxdenton employment area.
BEA 4 Busk	This BEA is located in Coldhurst and measures 5.33 ha. There has been some retail development within this area including an Aldi and a B&M store. These developments measure around 2.1 ha and therefore there is around 3.23 ha of employment land remaining. Remain as employment area but amend the boundary to remove the land developed for retail.

Table 1: Recommendations for the BEAs and SEAs going forward in the Local Plan

Business and Employment Area /	Recommendation for Draft Local Plan
Saddleworth Employment Area	
BEA 5 Primrose Bank	This BEA is located in Alexandra and measures 10.37 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as an employment area.
BEA 6 Hathershaw	This BEA is located in Alexandra and Medlock Vale and measures 12.38 ha. There has been a residential development measuring around 1.9 ha for 98 homes built on the site of the former Maple Mill which lies in the middle of the designation. This leaves around 10.48 ha of the employment area available. Remain as an employment area but exclude the land under construction for residential development and rename the sites BEA 6a and BEA 6b.
BEA 7 Higginshaw	This BEA is located in Royton South and St Mary's and measures 76.72 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as a an employment area.
BEA 8 Shaw Road	 This BEA is located in Royton South and measures 16.11 ha. There have been residential developments on Edge Lane Street and work is under construction on the former Vernon Works for residential site totaling around 4.9 ha. This leaves around 11.21 ha of the employment area available. Remain as an employment area but exclude the land developed for and under construction for residential development.
BEA 9 Shaw	This BEA is located in Shaw and measures21.33 ha. There has been a residential development measuring around 12.9 ha for 400 homes granted in the middle of the site, conditions are currently being discharged with development scheduled to commence shortly (demolition of the mills is currently underway). This leaves around 8.43 ha of the employment area available. Remain as an employment area but exclude the land under construction for residential development and rename the sites BEA 9 and BEA 10.
BEA 10 Greenacres	This BEA is located in St James' and St Mary's and measures 61.41 ha. There have been no significant changes to the nature of

Business and Employment Area /	Recommendation for Draft Local Plan
Saddleworth Employment Area	Rocommendation for Bran Local Flam
	the uses located here and it is still an
	occupied employment area. Remain as an
SEA 1 Oak View Mills	employment area. This SEA is located in Saddleworth South
	and measures 0.44 ha. There have been
	no significant changes to the nature of the
	uses located here and it is still an occupied
	employment area. Remain as an
	employment area.
SEA 2 Hey Bottom Mill	This SEA is located in Saddleworth South
	and measures 1.49 ha. There have been
	no significant changes to the nature of the
	uses located here and it is still an occupied employment area. Remain as an
	employment area.
SEA 3 Chew Valley Road	This SEA is located in Saddleworth South
	and measures 1.79 ha. There has been a
	housing development measuring around
	0.7ha hectares, this leaves around 1.09 ha
	remaining. Remain as an employment area
	but exclude the land developed for
SEA 4 Boarshurst Lane	residential development. This SEA is located in Saddleworth South
SEA 4 Boarshurst Lane	and measures 1.13 ha. There have been
	no significant changes to the nature of the
	uses located here and it is still an occupied
	employment area. Remain as employment
	area.
SEA 5 Waterside Mill	This SEA is located in Saddleworth South
	and measures 1.87 ha. There have been
	no significant changes to the nature of the uses located here and it is still an occupied
	employment area. Remain as an
	employment area.
SEA 6 Delph New Road	This SEA is located in Saddleworth North
	and measures 3.61 ha. There have been
	no significant changes to the nature of the
	uses located here and it is still an occupied
	employment area. Remain as an
SEA 7 Valley Mills	employment area. This SEA is located in Saddleworth North
	and measures 0.44 ha. There have been
	no significant changes to the nature of the
	uses located here and it is still an occupied
	employment area. Remain as employment
	area.
SEA 8 Shaw Pallets	This SEA is located in Saddleworth North
	and measures 6.79 ha. There has been a
	Secondary School developed on the rear of
	the site and the front of the site now has planning permission for residential
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Business and Employment Area / Saddleworth Employment Area	Recommendation for Draft Local Plan
	development. De-designate the employment area.
SEA 9 Warth and Ellis Mills	This SEA is located in Saddleworth North and measures 1.69 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as an employment area.
SEA 10 Greenbridge Lane	This SEA is located in Saddleworth South and measures 1.59 hectares. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as an employment area.
Foxdenton	Foxdenton is approximately 45 ha and is located within Chadderton Central. The site is designated as a mixed use employment led area under the adopted joint DPD. A large proportion of the site has now been developed or is under construction for residential and employment development. Recommend new boundary for the employment area around the Broadway Green employment developments. Exclude the residential and retail developments and add the remaining parcel to BEA 3 Greengate/Broadgate as it forms a more natural boundary.
Hollinwood Business District	Hollinwood Business District is approximately 70 ha and is located within the wards of Failsworth East, Hollinwood and Chadderton South. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as an employment area.
Chadderton Technology Park	Chadderton Technology Park is approximately 50 ha and lies within the wards of Coldhurst, Chadderton Central and Werneth. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as an employment area.

5.5. It is recommended that the Local Plan amend the BEAs and SEAs as set out above to reflect the changes that have happened and are happening on the ground and any new relevant evidence since they were designated in the joint DPD. This results in one employment area (SEA 8 Shaw Pallets, Diggle) being de-designated and a number of boundary changes to seven of the BEAs. Further work to take these employment areas forward may be needed as work on the Local Plan progresses.

- 5.6. The BEAs are currently designated as either Business and Employment Areas (BEAs) or Saddleworth Employment Areas (SEAs) in the adopted Joint DPD but going forward in this Local Plan they will all be known as Business and Employment Areas (BEAs) for consistency.
- 5.7. The list below sets out the renumbered list of BEAs as set out in the draft Local Plan, with any boundary amends, their former name and reference from the adopted Joint DPD set out in brackets, where applicable, alongside.
 - BEA 1 Wrigley Street (no boundary, name or reference number change)
 - BEA 2 Hawksley Street (no boundary, name or reference number change)
 - BEA 3 Greengate / Broadgate (potential boundary amend to incorporate land from Foxdenton, no name or reference number change)
 - BEA 4 Busk (potential boundary amend to exclude land developed for retail, no name or reference number change)
 - BEA 5 Primrose Bank (no boundary, name or reference number change)
 - BEA 6 Hathershaw (site a and site b) (potential boundary amend to exclude land developed for residential, creating two parcels of employment area, formerly BEA 6 Hathershaw)
 - BEA 7 Higginshaw (no boundary, name or reference number change)
 - BEA 8 Shaw Road (potential boundary amend to exclude land developed for residential, no name or reference number change)
 - BEA 9 Shaw (potential boundary amend to exclude land under construction for residential, creates two parcels of employment area. South of the site to remain as BEA 9, Shaw)
 - BEA 10 Linney Lane (potential boundary amend to exclude land under construction for residential, creates two parcels of employment area. North of the site to be renamed as BEA 10, Linney Lane)
 - BEA 11 Greenacres (no boundary change, formerly BEA 10 Greenacres)
 - BEA 12 Hollinwood (no boundary change, formerly Hollinwood Business District)
 - BEA 13 Broadway Green (potential boundary amend to exclude land developed for residential and retail, also potential amend to include undeveloped parcel to BEA 3, formerly Foxdenton)
 - BEA 14 Chadderton (no boundary change, formerly Chadderton Technology Park)
 - BEA 15 Oak View Mills (no boundary change, formerly SEA 1 Oak View Mills)
 - BEA 16 Hey Bottom Mill (no boundary change, formerly SEA 2 Hey Bottom Mill)
 - BEA 17 Chew Valley Road (potential boundary amend to exclude land developed for residential, formerly SEA 3 Chew Valley Road)
 - BEA 18 Boarhurst Lane (no boundary change, formerly SEA 4 Boarhurst Lane)
 - BEA 19 Waterside Mill (no boundary change, formerly SEA 5 Waterside Mill)
 - BEA 20 Delph New Road (no boundary change, formerly SEA 6 Delph New Road)
 - BEA 21 Valley Mills (no boundary change, formerly SEA 7 Valley Mills)
 - BEA 22 Warth and Ellis Mills (no boundary change, formerly SEA 9 Warth and Ellis Mills)
 - BEA 23 Greenbridge Lane (no boundary change, formerly SEA 10 Greenbridge Lane)

Proposed Policy Approach and Reasons

Policy E1 - Business and Employment Areas

- 5.8. This policy lists the 23 Business and Employment Areas that will be identified on the Policies Map (as set out above) and the uses that will be permitted within them. The uses that will be permitted are:
 - General industry B2
 - Storage and Distribution B8
 - Offices (having met the sequential test / impact assessment), light industrial and research establishments – E(g)
 - Building and construction related uses Sui Generis
 - Transport and transport related uses (including garages, scarp yards, car show rooms, taxi companies) – Sui Generis
 - Waste management facilities (in line with the Greater Manchester Waste
 - Development Plan Document policies) Sui Generis⁸
- 5.9. And in some circumstances, where the proposed development will be complimentary to the uses already in operation in the BEA and will not undermine the functionality of the wider employment area, the following uses may also be permitted:
 - Restaurants and Cafes E(b)
 - Financial and professional services E(c)
 - Medical or health facilities E(e)
 - Creche or day nursery E(f)
 - Retail facilities up to 300 square metres E(a)
 - Indoor sports, recreation or fitness E(d)
- 5.10. The uses listed as permitted above are based on the 'traditional' employment uses of office, industry and warehousing and also the Sui Generis employment providing uses that operate within a number of our employment areas already. The complimentary uses listed are uses that may sit alongside the permitted uses and operate without undermining the employment area. In addition, they reflect the uses permitted within Class E of the use class order (introduced in 2020).

Policy E2 Exceptions within Business and Employment Areas and other existing employment sites

- 5.11. This policy outlines the circumstances in which uses other than those listed in Policy E1 may be permitted within employment areas. It states that applicants should clearly demonstrate that it is no longer appropriate to continue the existing use. For sites within our BEAs it states that one of the following four criteria summarised below need to be met:
 - A marketing appraisal clearly demonstrating that there is no current or likely future demand for them to continue for any employment or commercial uses;
 - The site is specifically identified as being appropriate for other uses in a masterplan or framework and its retention as an employment site would conflict with the masterplan or framework;
 - The site is required for a facility or infrastructure meeting a regional or national need; or

⁸ 'Sui generis' developments are those that do not fall within any particular use class.

- The site and premises are no longer suitable for the existing use.
- 5.12. In addition, the applicant would also need to submit a statement outlining that there is a clear need for the proposed land use and the proposed redevelopment would not compromise the primary function and operations of neighbouring users.
- 5.13. For sites not within a designated BEA but last used for employment purposes that are over 0.25 hectares the criteria is the same as above, however for sites not within a designated BEA but last used for employment purposes that are smaller than 0.25 hectares the applicant would just need to submit a statement outlining that there is a clear need for the proposed land use and the proposed redevelopment would not compromise the primary function and operations of neighbouring users. This is so that the policy requirements are proportionate to the impact the development may have on the borough's economy.

Integrated Assessment

5.14. Policies E1 and E2 both scored positively or neutral with E2 scoring one uncertain due to the fact that it was unknown whether the policy may contribute towards providing a sustainable housing land supply. If the exceptions are me then it could contribute however it is uncertain as we do not know what applications we may get. No enhancements to the policy were required as a result of the IA process. The policies have been screened in by the HRA as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows). The HRA has also screened in Business Employment Areas (BEAs) (which this policy relates to) as they could result in increased road traffic resulting in increases in air pollution. In addition, Hollinwood Business District; Wrigley Street and Greengate / Broadgate BEAs are close to the Rochdale Canal SAC (within 200m) and development could result in direct impacts on the Canal. The HRA identifies mitigation measures to address likely significant effects.

6. Policy E3 – Reuse and redevelopment of Mill Buildings

Feedback from Issues and Options consultation

- 6.1. Responses received included that mills developments should be considered on an individual basis in terms of employment use.
- 6.2. Historic England have worked in close collaboration with the council in preparing a Mills Strategy for Oldham. Mills are fundamental to the character of Oldham and the wider borough, with the town growing from a small Pennine community at the start of 19th century to become the country's most important centre for cotton spinning by the middle of that century. This has shaped the evolution of the town including its housing stock, civic buildings and architecture and shaped communities to this day. Since the decline of the cotton industry many mills have been lost and with important elements of Oldham's distinctive vernacular and character. A policy approach which seeks to retain those mills which are significant either as designated or non-designated heritage assets either individually or as part of a cluster of important mills is an important issue for the local plan.

Issues to be addressed

- 6.3. The future use of textile mills has been identified as an important policy area specific to Oldham as an issue to address. It is important to ensure the textile mills have a sustainable future, which considers their potential for future development focussing on residential and employment uses.
- 6.4. This is also part of our positive approach to making the most efficient use of brownfield land and existing buildings, reducing the need for additional pressure on greenfield sites and reducing our carbon footprint. The reuse of mills can add to local distinctiveness as part of place making, attract investment and help retain Oldham's strong identity and culture.

Evidence Base

- 6.5. The <u>Oldham Mill Strategy</u>⁹ was published in November 2021 and was commissioned by Oldham Council and Historic England in order to develop a positive strategy for the sustainable future of the textile mill stock across Oldham.
- 6.6. The Oldham Mills Strategy identifies the non-designated mills across Oldham which are of particular landscape and heritage value and sets out a robust strategy to ensure their sustainable future, which considers their potential for future development for residential, employment and other uses.
- 6.7. The Mills Strategy acknowledged that innovative solutions may be required to support the full occupation of individual mills that are currently underutilised, particularly the upper floors of such buildings. It stated that the approach could include allowing a broader mix of uses within individual mills, which may not necessarily be fully compliant with designated employment areas, such as the provision of residential uses (e.g. flats, older person's accommodation, live / work type units), community or leisure uses in appropriate circumstances where the benefits of securing the active re-use of mill buildings could be seen to outweigh potential conflicts with established plan policies.

Proposed Policy Approach and Reasons

- 6.8. This policy sets out that proposals for non-employment generating uses within mills either in designated BEAs or elsewhere may be permitted in appropriate circumstances where the benefits of securing the active re-use of mill buildings could be seen to outweigh the loss of the use of the site for wholly employment generating purposes.
- 6.9. This approach has been taken as it is recognised that, due to the age, scale, format and condition of mill buildings, it may not always be economically viable to secure the repurposing of individual mills to provide modern, fit for purpose employment and/or commercial floorspace. In addition to this, from the work carried out on the Mills Strategy and through consultation responses received it is acknowledged that there may be circumstances where securing the reuse of a mill buildings outweighs the loss of the site for employment purposes.

⁹ The full document can be found at: <u>file://home/atog/clare.davison/Downloads/Oldham_Mill_Strategy_2021%20(5).pdf</u>

Integrated Assessment

6.10. Policy E3 scored positively or neutral. No enhancements to the policy were required as a result of the IA process. The policy has been screened in by the HRA as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows) and there may also be possible direct impacts on the Rochdale Canal SAC from development within 200m of the Canal. The HRA identifies mitigation measures to address likely significant effects.

7. Policy E4 – Office, Industry and Warehousing Allocations

Feedback from Issues and Options consultation

- 7.1. In relation to allocating employment land, one comment was received in support for a combination of providing some new employment land and improving sustainable connectivity to existing and neighbouring districts key employment sites.
- 7.2. There were requests that sites with heritage assets have Historic Impact Assessments and that sites in close proximity to SAC and SSSI's are assessed in Habitats Regulations Assessments.
- 7.3. Some specific comments were submitted regarding the availability of some of the saved UDP allocations.

Issues to be addressed

7.4. There is the need to ensure the Local Plan provides a positive framework so that Oldham has a range of sustainable sites to support the local economy.

Evidence Base

- 7.5. Oldham has prepared a Draft Employment Land Review (ELR) Part One for consultation alongside the Draft Local Plan. The findings of this review were:
 - The employment land and floorspace requirements for Oldham up to 2039 is 53 hectares. 12 hectares for office and 41 hectares for industry and warehousing.
 - The audit of our designated Business and Employment Areas and Saddleworth Employment Areas boundaries reulted in a number of recommendations for the Local Plan. If taken forward this would result in one employment area (SEA 8 Shaw Pallets, Diggle) being de-designated and boundary changes to seven of the BEAs.

Proposed Policy Approach and Reasons

7.6. This policy proposes to allocate eight sites for office (Eg), industry (B2) and warehousing (B8) development to assist in meeting the borough's employment

land requirement, these are set out below in Table 2.

Site name	Ward	Site area (ha)	Indicative employment floorspace (sqm)
Land at Greengate, Chadderton	Chadderton Central	1.19	3,654
Land at Greenside Way, Chadderton	Chadderton Central	0.63	3,654
Land at Foxdenton	Chadderton South	5.10	20,080
Sellers Way	Chadderton South	0.93	3,960
Land at Albert St, Failsworth, Oldham	Failsworth East	6.21	20,000
Land at Mersey Road North/Albert Street, Failsworth, Oldham	Failsworth East	0.57	2,400
Former Windsor Mill, Hollins Rd, Failsworth	Failsworth East	0.60	2,400
Former British Gas site, Higginshaw lane	Royton South	4.55	16,800

Table 2: Proposed em	ployment	t allocations	as set out ir	the Draft Local	Plan

7.7. All the sites have been assessed through the Draft ELR and through the site allocations process and deemed suitable as employment allocations, alongside the Strategic Allocations proposed as part of PfE. Combined these sites meet our employment land requirement up to 2039.

Integrated Assessment

- 7.8. At Issues and Options stage a Spatial Option was presented for employment allocations. The options in relation to allocating employment land were:
 - a. To focus more on the sustainable connectivity to our existing employment sites and neighbouring districts key employment sites; or
 - b. A combination of providing some new employment land and improving sustainable connectivity to existing and neighbouring districts key employment sites.
- 7.9. The Integrated Assessment (IA) of these employment allocation options showed that at that stage there were more uncertainties with Option B (new employment land improving employment connectivity to existing employment sites), which if taken forward as an option would need further assessment and mitigation if required in comparison to Option A (improve connectivity to existing employment sites). However, it was decided to take forward Option B and provide a combination of new employment land (within Policy E4) and improve sustainable connectivity to existing and neighbouring districts key employment sites. The option incorporated Option A and it was considered important that our residents have access to job opportunities within the borough, while also having improved connectivity to existing and neighbouring districts key employment sites. This option maximises the job opportunities available to our residents.

- 7.10. As part of the Draft Local Plan IA Policy E4 scored positively or neutral and one uncertain. This uncertain score is due to the fact that some allocations may have flood risk affecting the site, however a flood risk sequential test has been carried out for the allocations and a site-specific flood risk assessment would be undertaken where required.
- 7.11. No enhancements to the policy were required as a result of the IA process. Therefore, Option B has been shown to be acceptable within the IA framework.
- 7.12. The policy has been screened in by the HRA as there may be possible impacts on European sites arising from air pollution effects (increased traffic flows) and due to the fact that there may be possible direct impacts on the Rochdale Canal SAC from development within 200m of the Canal. The HRA identifies mitigation measures to address likely significant effects.

8. Policy TM1 – Tourism and Policy TM2 – Farm Diversification

Feedback from Issues and Options consultation

- 8.1. In relation to tourism, some suggestions were made in relation to ways in which we could build upon Oldham's tourism base. Comments were made stating that there was a growing need for overnight/long stay accommodation in appropriate rural locations.
- 8.2. Comments were also submitting stating that there is a need to promote our green areas and that we should support Northern Roots as a sustainable attraction for visitors as well as for the range of other environmentally friendly benefits it will bring.
- 8.3. There was support for including a policy on farm diversification.

Issues to be addressed

- 8.4. There is the need to ensure that the Local Plan supports a range of sustainable tourism activities, that it helps create thriving centres and that it protects and enhances access to quality open spaces. There is also the need to support growing local businesses which includes businesses in our rural communities.
- 8.5. The Scoping Report has since been updated (Update 2) and identifies the issues to address including to promote sustainable tourism and recreation

Evidence Base

8.6. There is extensive work on-going in Oldham Town Centre, it is at the heart of the Creating a Better Place agenda and its transformation will attract visitors which will grow the borough's visitor numbers. Plans involve the creation of Jubilee Park one of the largest, urban parks to be proposed in England. This will be connected to the wider town centre and beyond through the creation of 'stepping-stone' open spaces and integration of green infrastructure as part of new developments coming forward to ensure these are integrated into the wider network. In addition, upgrading the night-time and creative economy, including improving the food and drink offer, expanding the entertainment and leisure sector and developing the cultural

attractions, is an essential part of ensuring a sustainable future for Oldham Town Centre.

- 8.7. Oldham has prepared a <u>Green Infrastructure Strategy</u>¹⁰ that outlines a number of place based opportunities for Green Infrastructure including locations in the borough that could generate inbound tourism. This includes:
 - Tandle Hill Country Park;
 - Key landscapes within Saddleworth;
 - Recreation Routes such as Oldham Way and Medlock Valley Way;
 - Northern Roots Urban Farm and Eco Park;
 - Alexandra Park;
 - Daisy Nook Country Park; and
 - Rochdale Canal and Huddersfield Narrow Canal Corridors.
- 8.8. In addition, to support PfE, in 2020 a piece of work was carried out <u>Identification of opportunities to enhance the beneficial use of the Green Belt</u>¹¹. It focused on the identification of potential opportunities to enhance the beneficial use of retained and proposed Green Belt in the vicinity of the Greater Manchester.
- 8.9. For parts of Oldham the assessment suggests beneficial use proposals and potential Green Infrastructure enhancements in relation to access, sport and recreation, biodiversity and wildlife corridors and landscape and visual. This included suggestions such as improving access to Tandle Hill and improving existing features within Daisy Nook Park for example.
- 8.10. There is no specific evidence in relation to farm diversification within Oldham, however it is acknowledged that within in our substantial countryside there are a number of farms.

Proposed Policy Approach and Reasons

Policy TM1 – Tourism

- 8.11. This policy states that the council will support new tourism related development and that proposals should protect and enhance the functions of the key tourism locations of Oldham Town Centre, promote our Green Infrastructure assets to generate inbound tourism at various locations and encourage and promote tourism proposals which improve access to the Green Infrastructure network.
- 8.12. Oldham Town Centre will be the focus for tourism, with many attractions, the growing evening economy and its varied event programme throughout the year that will contribute towards raising Oldham's profile regionally and nationally. In addition, the borough's rich and varied Green Infrastructure network is also a key component of

¹⁰ This document can be found at:

https://www.oldham.gov.uk/downloads/file/7627/oldham_green_infrastructure_strategy_2022 ¹¹ This document can be found at: https://www.greatermanchester-ca.gov.uk/what-we-do/planningand-housing/places-for-everyone/previous-stages/places-for-everyone-2021-regulation-19/supportingdocuments-2021/?folder=%5C07%20Greener%20Places#fList

our tourism offer and improving and enhancing access to those key locations will be important in growing our visitor numbers¹².

Policy TM2 – Farm Diversification

8.13. This policy sets out the circumstances in which proposals for farm diversification will be supported. It includes supporting proposals provided that they: are in accordance with national planning policy and preserve the openness of the Green Belt, make a positive contribution to an established agricultural enterprise, are of a suitable scale, do not harming access to the countryside, do not causing any unacceptable impact on the surrounding land and are acceptable in highways terms.

Integrated Assessment

8.14. Policies TM1 and TM2 scored positively or neutral with TM2 scoring one uncertainty. This uncertainty is because depending on the location of the farm, development may need to consider the impact on landscape character. No enhancements to the policies were required as a result of the IA process. Policy TM1 has been screened in by the HRA due to possible cause of increase in recreational disturbance, both to the Canal and to the South Pennine Moors. The HRA identifies mitigation measures to address likely significant effects.

9. Further Work and Next Steps

- 9.1. Between the Draft Plan stage and Publication Plan stage a final ELR will be produced following its public consultation, with any comments received being considered and fed into the final version where appropriate. Comments received on the Draft Local Plan policies will also be considered and reflected upon are where appropriate incorporated into the publication plan.
- 9.2. Further work will be needed on the employment allocations and the BEAs and SEAs for them to progress to the final plan. This may include transport modelling and further ecology, flooding and heritage assessments.

¹² The council is also doing work on a South Pennines Supplementary Planning Document to encourage visitors away from the South Pennines and mitigate recreational impacts under PfE Policy JP-G5: Uplands