Oldham Local Plan

Oldham Draft Employment Land Review Part One



January 2024

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1. Executive Summary

- 1.1. As part of the preparation of the Local Plan, Oldham Council has undertaken this Draft Employment Land Review (ELR) Part One (the Draft ELR) to help create robust and informed employment land policies.
- 1.2. This draft ELR forecasts the need for new employment land over the plan period and provides an audit of our existing designated employment areas to see how fit for purpose the current boundaries are. The next stage of the ELR will review the existing saved Unitary Development Plan (UDP) Business and Industrial allocations; and Business and Office allocations and consider whether new employment allocations should be made in order to meet our requirement and/or if any existing employment allocations should be de-allocated or carried forward. This will be informed by feedback on the potential allocations set out in the Draft Local Plan.
- 1.3. The methodology used to calculate the employment land requirement has been based on evidence used to produce the Places for Everyone (PfE) Joint Plan and other examples of best practice.
- 1.4. In addition to forecasting the employment land requirements, the draft ELR has also carried out an audit of the boundaries of our designated employment areas. In addition to our 'employment land allocations' in Oldham's adopted Local Plan (the Joint DPD) there are 23 Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) designated. Although they do not count towards our 'employment land requirement' as they are designated for a range of commercial activities it is considered important to carry out an audit of the BEAs and SEAs to provide an up to date and accurate picture of Oldham's employment land and premises offer and ensure the boundaries are appropriate.
- 1.5. The key findings from this Draft ELR are:
 - 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 resulted 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.

2. Introduction

- 2.1. Oldham Council is reviewing its Local Plan. To inform this the council has undertaken this Draft Employment Land Review (ELR) Part One (the draft ELR) to help develop robust and informed economic policies.
- 2.2. ELRs are part of the recognised evidence base that informs plan making. Government policy and guidance indicate that the role of ELRs is to provide sound evidence to inform Local Planning Authorities in planning for employment land uses.
- 2.3. If Oldham is to achieve its vision set out in The Oldham Plan <u>'Our Future</u> <u>Oldham A Shared Vision for 2030'</u>¹ to 'uplift every resident' it is essential that we have a portfolio of diverse, suitable, attractive employment sites for existing businesses to grow and relocate to and to attract new businesses to invest in the borough in order to allow our residents access to decent jobs that pay well.
- 2.4. In addition, an ELR should, where applicable, identify existing employment sites that are no longer suitable for future employment uses and could therefore be considered for alternative uses. If applicable, this will be carried out in the Final ELR and will be informed by feedback received on the potential allocations set out in Policy E4 of the Draft Local Plan.
- 2.5. As well as land-use planning, ELRs should help inform policy interventions relating to employment land. Through, for example, helping to bring sites forward for employment use or supporting a particular kind of employment development, as part of economic development and regeneration programmes.
- 2.6. When this Draft ELR refers to 'employment land' please note that this is referring to land for office (E(g)), industry (B2) and warehousing (B8).

¹ This document can be found at: <u>https://www.oldham.gov.uk/downloads/file/7589/the_oldham_plan_-</u> our_future_oldham

3. Oldham Context

- 3.1. Oldham is situated in the northeast of Greater Manchester. It covers an area of 55 square miles. Our neighbouring boroughs are Rochdale, Manchester, Tameside, High Peak, Peak District National Park Authority, Kirklees and Calderdale. It has a real rural and urban mix, stretching from within five miles of Manchester City Centre, to the moorlands of Saddleworth, with almost a quarter of the borough within the Peak District National Park.
- 3.2. Over half of the borough is open land that provides an attractive setting to built-up areas and is an important natural resource supporting agricultural, tourism and recreational activities. The majority of the open land is designated Green Belt or locally protected open countryside. River valleys and waterways, including the Rochdale Canal corridor and the Huddersfield Narrow Canal, provide habitats and corridors for wildlife, as well as opportunities for recreation, tourism and regeneration.
- 3.3. Oldham is an area of great opportunity and significant need. The borough benefits from a diverse and vibrant community, a young, growing and entrepreneurial population, an improving educational offer and access to an extensive labour pool within the wider Greater Manchester area. However, the economy of Oldham reflects several longstanding issues, with relatively weak private sector growth and a dominance of low skill and low wage industries.
- 3.4. Oldham is home to around 242,100 residents who live across five districts and twenty wards and make up 8.4% of Greater Manchester's population². The borough has a higher proportion (34.8%) of ethnic minority residents than in Greater Manchester (28.7%), the North West (18.8%), and England (26.5%)³. The ethnic composition in Oldham currently stands at 68.1% White, 13.5% Pakistani, 9% Bangladeshi and 9.3% 'other'⁴. Equality and diversity are embraced within Oldham and the number of ethnically diverse communities continue to grow. This diversity is reflected within schools, with over 90 different languages recorded as being spoken⁵. Oldham brings together a variety of cultures and is proud of the uniqueness that this brings to the borough.
- 3.5. The borough has a relatively young population, with a high proportion (22.7%) of residents aged under 16 and proportionally fewer (15.9%) aged 65 and over⁶. Our increasing population profile is a result of improving life expectancy, internal migration and the growth in Pakistani and Bangladeshi communities.
- 3.6. There are over 7,155 businesses, employing 94,000 people in Oldham⁷, according to the Annual Population Survey⁸. Those businesses span key economic sectors including advanced manufacturing, health and social care, construction, education, digital and creative and financial and professional services. The borough is home to several well-known and high-profile businesses including Trinity Mirror Group, Diodes

² Census, 2021. Information on the Census can be found here: https://www.ons.gov.uk/census

³ Census, 2021. Information on the Census can be found here: https://www.ons.gov.uk/census

⁴ Census, 2021. Information on the Census can be found here: https://www.ons.gov.uk/census ⁵ School Census, 2020

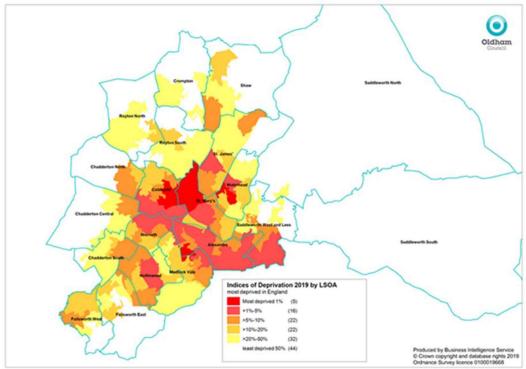
⁶ Census, 2021. Information on the Census can be found here: https://www.ons.gov.uk/census

⁷ Business Demography and UK Business Counts, 2022

⁸ ONS Annual Population Survey, 2023

Incorporated, Ferranti Technologies, Seton Healthcare Ltd, Park Cake Bakeries, Innovative Technologies, Ambassador Textiles, and Nov Mono Pumps. The <u>Oldham</u> <u>Independent Economic Review</u>⁹ identified a strong "entrepreneurial culture" in the borough, with large numbers of business start-ups and small and micro businesses. Wholesale and retail, construction, and professional services contribute significant numbers of jobs, with manufacturing the largest single sector in terms of Gross Value Added (although this has declined).

3.7. The unemployment rate in Oldham currently stands at 6.6%, compared to 5% within Greater Manchester and 3.8% in England¹⁰. Oldham's overall rank in the <u>indices of deprivation</u> has maintained a clear downward trend since 2004, relative to other authorities. The worsening of the 'extent' rank may indicate that deprivation (relative to other areas rather than in absolute terms) is taking on a wider geographic scope across Oldham. Pockets of deprivation are particularly concentrated around the inner Oldham area. The borough is the 19th most deprived local authority area¹¹ in the country, with five Lower Super Output Areas (LSOA's) sitting within the worst 1% nationally, one more than in 2015 with the addition being parts of Littlemoor/Greenacres.



Oldham Indices of Deprivation 2019 by Lower Super Output Area

3.8. The median household income for Oldham in 2022 was £27,800, which is below Greater Manchester (£31,00) and national (£35,154) levels¹². Oldham has traditionally had a weak skills base, a legacy of generations of manual employment, which means Oldham residents have found it difficult to enter key economic sectors in recent years. In relation to skills the latest census data shows that the proportion of residents with

⁹ The document can be found at: <u>https://oerb.org.uk/</u>

¹⁰ ONS Claimant Count, August 2023. This information can be viewed at: <u>CC01 Regional labour market:</u> <u>Claimant Count by unitary and local authority (experimental) - Office for National Statistics (ons.gov.uk)</u> The English Indices of deprivation 2019 can be found at: <u>https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019</u>

no qualifications has decreased from 22.2% in 2011 to 19.6% in 2021. However, the 2021 figure remains above Greater Manchester (14.5%) and England (12.4%) proportions. The proportion of residents with NVQ 4+ (Degree level or above) has increased from 20.3% in 2011 to 26.6% in 2021. Again, the 2021 figure remains below both Greater Manchester (35.0%) and England (37.1%) proportions.

3.9. The council's ambitions for Oldham Town Centre aim to create a more vibrant, revitalised centre that plays a greater role in Greater Manchester. Oldham's cultural offer includes Gallery Oldham which has collections of regional and national importance, a variety of museum collections, archives and arts, the Oldham Theatre Workshop and libraries. Gallery Oldham continues to attract a high number of visits with visitors enjoying the fantastic range of exhibitions and events on offer.

4. Policy Context

National Policy Context

National Planning Policy Framework (December 2023)

- 4.1. The framework sets out planning policies for England, as made by the Government, and the ways in which they can be applied. The introduction states that it 'provides a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner'. The NPPF must be taken into account when developing local authority development plans and remains a material consideration in planning decisions.
- 4.2. 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.
- 4.3. 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.
- 4.4. Also key for employment, and other sites, is Chapter 11 on making 'Effective Use of Land'. Paragraph 126 states that 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, support applications for alternative uses on the land where the proposed use would contribute to meeting an unmet need for development in the area.
- 4.5. In addition, paragraph 127 states that local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:
 - use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and

• make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.

Planning Practice Guidance Housing and Economic Land Availability Assessment (July 2019)

- 4.6. This guidance states that the assessment of land availability is an important step in the preparation of a 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).
- 4.7. 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.
- 4.8. 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 by 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 by when; and
 - an indicative trajectory of anticipated development and consideration of risk.
- 4.9. There is no formal requirement for an annual update of employment (including retail, office, manufacturing) site allocations, rather that they should be regularly reviewed.

Planning Practice Guidance Housing and Economic Development Needs Assessment (December 2020)

- 4.10. The Planning Practice Guidance 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 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.
- 4.11. 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.
- 4.12. It goes on to explain how market demand be analysed, employment land requirement be derived, and the need for logistics can be assessed.

Greater Manchester Policy Context

Places for Everyone (PfE) Joint Development Plan Document (DPD)

- 4.13. The Places for Everyone (PfE) Joint Development Plan Document (DPD), 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 (a cross-boundary allocation with Rochdale), 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.
- 4.14. 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.
- 4.15. 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.
- 4.16. The Vision in PfE is to make the Plan area one of the best places in the world to grow up, get on and grown old. It is underpinned by ten objectives which range from meeting housing need to improving the quality of our natural environment and access to green spaces.
- 4.17. 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.
- 4.18. **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.
- 4.19. 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.
- 4.20. 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.

- 4.21. 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.
- 4.22. 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. This was the supply as at April 2022 and includes Saved Unitary Development Plan (UDP) business and industry allocations, sites with planning permission for office, industry and warehousing and the allocations within PfE that provide office, industry and warehousing floorspace.
- 4.23. PfE also highlights the importance of high-quality digital infrastructure and how they can open up a range of opportunities. It states that any truly global city will need to have widespread, affordable, reliable, secure and future-proofed digital infrastructure that provides a competitive edge for businesses and supports high-levels of social inclusion. This will be essential if our borough's are to capitalise on new innovations, such as artificial intelligence, the Internet of Things and connected and autonomous vehicles. Policy JP-C2: Digital Connectivity outlines the range of measures the Plan area will support in order to help facilitate the provision of affordable, high quality digital infrastructure. This includes:
 - Enabling the roll-out of latest generation mobile technology and full fibre to the premise connectivity;
 - Requiring all new development to have full fibre to premises connections, unless technically infeasible and/or unviable, and to incorporate multipleducting compliant with telecoms standards; and
 - Facilitating the provision of free, secure, high-speed public wi-fi connections.
- 4.24. PfE also 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 (this allocation includes the delivery of around 21,000sqm for industry and warehouse floorspace as an extension to the existing Higginshaw Business Employment Area), JPA15 Chew Brook Vale, JPA16 Cowlishaw, JPA17 Land south of Coal Pit Lane' and JPA18 South of Rosary Road.

Local Policy Context

- Joint Core Strategy and Development Management Policies DPD 'Joint DPD' (November, 2011)
- 4.25. The current Local Plan in Oldham was adopted in November 2011. The Vision includes:
- 4.26. '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'.
- 4.27. '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 Manchester City Centre and our neighbouring district's key sites 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'.
- 4.28. The Employment Land Review (March 2010) that informed the preparation of the Joint DPD concluded that up to 2026 the borough would require 82 hecatres of employment land. The Joint DPD did not allocate this land as it was intended to form part of the Site Allocations DPD so this information will all have to be reviewed and updated as part of the Local Plan Review.
- 4.29. The Joint DPD saved some policies from the previous Local Plan (Oldham Metropolitan Borough Unitary Development Plan Adopted July 2006). Two of these were employment land allocation policies:
 - B1.1. Business and Industrial Allocations; and
 - B1.2 Business and Office Allocations.
- 4.30. Policy 13 of the Joint DPD 'Employment Areas' sets out the Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs), which (with the exception of Foxdenton) are the boroughs established employment areas. They cater for a wide range of businesses – from traditional industry and warehousing to waste management facilities and restaurants and are distributed throughout the borough. The full list of uses permitted can be found in Policy 14 'Supporting Oldham's Economy' along with details as to how the Joint DPD protects the BEAs and SEAs and how any exceptions to the uses permitted may be acceptable in certain circumstances.

5. Study Objectives

- 5.1. The overall purpose of this stage of the Draft Employment Land Review is to assess the future demand for employment land in Oldham up to 2039 and provide an audit of our designated employment areas (currently known as BEAs and SEAs) to ascertain if their boundaries are still appropriate.
- 5.2. The Final ELR will consider whether existing existing saved Unitary Development Plan (UDP) Business and Industrial allocations and Business and Office allocations are sufficient to meet projected demand and forecast requirements. It may also assess other sources of our employment land supply and any other potential employment land that may come forward, if appropriate.

Ascertain future employment land requirement up to 2039

- 5.3. This stage will be done broadly in conformity with the work carried out for Places for Everyone The method that will be used to ascertain a quantitative employment need figure will be:
 - Step 1: Assess the average historic take-up/development rate of employment land;
 - Step 2: Apply a demand margin / buffer; and
 - Step 3: Convert the employment land requirement into square metres.

Audit of existing Employment Areas

5.4. In addition to forecasting the employment land requirements, the draft ELR has also carried out an audit of the boundaries of our designated employment areas. In addition to our 'employment land allocations' in Oldham's adopted Local Plan (the Joint DPD) there are 23 Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) designated. Although they do not count towards our 'employment land requirement' as they are designated for a range of commercial activities it is considered important to carry out an audit of the BEAs and SEAs to provide an up to date and accurate picture of Oldham's employment land and premises offer and ensure the boundaries are appropriate.

6. Employment Land Requirements up to 2039

- 6.1. This stage in the Draft ELR assesses the demand for employment land in Oldham up to 2039. The steps followed to determine our employment land requirement up to 2039 are:
 - Step 1: The average actual historic take-up/development rates was calculated based on past trends from 2012/13 to 2021/22.
 - Step 2: A five-year margin of flexibility or buffer added to account for the uncertainties in any forecasting exercise; and the aspiration to increase the overall size and competitiveness of the Oldham's economy.
 - Step 3: Convert the employment land requirement into square metres.

Step 1: Average Historic Take Up Rates

6.2. Table 1 below sets out the total amount of land developed for office, industry and warehousing (formerly B1 use (now Eg and B2 and B8 uses) in Oldham over the past 10 years, there is also a column for developments that obtained planning permission for a mixture of the three employment types. It is important to note that completions are recorded as a gross figure for the development or use as a whole. The figures have then been averaged to obtain an annual average employment land figure.

Year	Employment Land Take Up per year	Office (Eg)	Industry (B2)	Warehousing (B8)	Mix
2012-2013	4.31	0.36	1.56	0.5	1.89
2013-2014	0.46	0.4	0.06	0	0
2014-2015	2.15	0.88	1.23	0.02	0.02
2015-2016	0.74	0.18	0.56	0	0
2016-2017	1.73	0.5	0.4	0.8	0
2017-2018	5.26	0.5	0.3	2.91	1.6
2018-2019	2.98	0.01	0.62	1.26	1.08
2019-2020	5.08	0.01	1.67	0.45	2.95
2020-2021	1.35	0.11	0.89	0.35	0
2021-2022	0.18	0.12	0.06	0.00	0.00
Total	24.24	3.07	7.35	6.29	7.54
Annual Average	2.42	0.31	0.74	0.63	0.75

Table 1: Past completion rates for office, industry and warehousing in Oldham 2012/13 - 2021/22

6.3. The table above sets out that based on historic take up rates, the annual average of Oldham's employment land developments is 2.42 hectares per year. To be consistent with the policies in PfE, going forward, industry and warehousing figures will be combined, and the offices will remain separate. Any completions that are recorded for an un-determined mix of office, industry and warehousing will be split one-third into office completions and two thirds into industry and warehousing completions.

	Office	Industry and Warehousing (combined)
Annual Average	0.31	1.37
Mix split 3 ways	0.25	0.50
Total annual average	0.56	1.87

Table 2: Total annual average of office, industry and warehousing completions

- 6.4. Table 2 above shows a total annual average of:
 - 0.56 hectares office completed on average each year; and
 - 1.87 hectares industry and warehousing completed each year.
- 6.5. The plan period extends to 2039 so extrapolating those figures to 2039 gives a requirement over the plan period of:
 - 9.49ha of office land; and
 - 31.71ha of industry and warehousing land.

Step 2: Applying a margin of flexibility

- 6.6. It is standard practice in employment land studies to add an uplift often called a "buffer" or a "margin of choice". These buffers tend to be expressed either as a % or in the region of two to five years of supply. The need for the margin is often described as providing for some flexibility to allow for:
 - Potential margin of error associated with any forecasting process for future need;
 - Choice of sites to facilitate competition in the property market;
 - Some level of vacant floor space within functioning markets; and
 - Flexibility to allow for any delays in individual sites coming forward.
- 6.7. There is no consistency across employment land studies as to how large the margin or buffer should be. The minimum generally used is two years of need (or looked another way the annual supply required to meet the assessed need) but many studies include five years of supply, including PfE. For consistency with PfE, this Draft ELR also adds a five-year buffer.

	Office (hectares)	Industry and Warehousing (hectares)
Total annual average (weighted)	0.56	1.87
Total gross need up to 2039	9.49	31.71
Add buffer of 5 years	2.79	9.33
Total overall	12.28	41.04
Total rounded	12	41

Table 3: Office, industry and warehousing requirement for Oldham up to 2039.

6.8. Table 3 above shows that for offices the need up to 2039 is for around 12 hectares and for industry and warehousing around 41 hectares.

Step 3: Convert the employment land requirement into square metres

- 6.9. Finally, to provide a floorspace figure, the land requirements will be converted into square metres and then a standard plot ratio of 40% applied, however it is acknowledged that office developments generally occupy less space than industrial and warehousing units, particularly within centres.
- 6.10. Table 4 sets out the employment land requirements for Oldham in floorspace (sqm) up to 2039.

Table 4: The employment land requirements for	r Oldham in floorspace (sqm) up to 2039.
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Requirement	Office	Industry and Warehousing	Combined Total
Hectare	12.28	41.04	53.32
Conversion to sqm	122,833	410,395	533,229
Total with plot ratio of 40% applied	49,133	164,158	213,291

6.11. To conclude this requirement section the employment land and floorspace requirements for Oldham up to 2039 is **53 hectares of land which equates to 213,291 square meters.**

7. Oldham's Employment Land Supply

- 7.1. As set out previously, 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.
- 7.2. Table 6.1 of PfE sets out that Oldham has a supply 81,998 square meters of office floorspace and Table 6.2 states that Oldham has a supply 278,922square meters of industrial and warehousing floorspace for the plan period. This was the supply as at April 2022 and includes Saved Unitary Development Plan (UDP) business and industry allocations, sites with planning permission for office, industry and warehousing and the allocations within PfE that provide office, industry and warehousing floorspace.
- 7.3. Table 5 below shows the breakdown of this supply in hectares.

Saved UDP employment allocations	38.74 hectares
Sites with extant planning permission	14.23 hectares
Sites under construction	9.42 hectares
Total	62.39 hectares

Table 5: Breakdown of employment land supply as at 1 April 2022:

7.4. As part of the work on the draft Local Plan to inform our site allocations, some sites from this supply have been identified as having potential for allocation as employment sites. This is where they reflect the council's Creating a Better Place programme, facilitating for example the continued development of Hollinwood Junction and land at Foxdenton, or where there has been recent market interest in bringing forward the site. These sites are listed within Policy E4 of the draft Local Plan. The potential allocations that have been identified are just part of how the council will meet its employment land requirement, the remaining supply will still contribute as will PfE allocations that provide employment land, once adopted. The potential allocations from Policy E4 are set out in Table 6 below. More detailed information on them can be found in Draft Local Plan Appendix 4.

Table 6: Proposed employment allocations as set out	in the Draft Local Plan
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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

7.5. Going forward a more detailed assessment of our employment land supply will be carried out, particularly on our saved UDP Business and Industrial Allocations and Business and Office Allocations, to determine their suitability as employment allocations, this will be informed by feedback on the potential allocations set out in the Draft Local Plan. This will form part of Final ELR.

8. Assessment of Business and Employment Areas and Saddleworth Employment Areas boundaries

- 8.1. In addition to our 'employment land allocations' in Oldham's adopted Local Plan (the Joint DPD) there are 23 Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) designated. These areas are spread throughout the borough and are of varying sizes and tend to be the focus for employment and commercial activity within Oldham. They are designated for a range of employment uses under policies 13 and 14 of the Joint DPD.
- 8.2. The range of uses permitted are:
 - B1 Business.
 - B2 General Industry.
 - B8 Storage or Distribution.
 - A3 Restaurants and Cafes.
 - A4 Drinking Establishments.
 - A5 Hot Food Takeaway (excluding SEAs 1 to 10).
 - C1 Hotels. viii. Leisure facilities up to 1,000 square metres gross floorspace.
 - Retail facilities up to 500 square metres gross floorspace.
 - Building and construction related uses.
 - Transport and transport-related uses.
 - Waste management facilities.
 - Garden centres.
- 8.3. In Policy 14 there are a number of exceptions listed, and if one is met to the council's satisfaction, uses other than the employment ones listed may be permitted. The applicant must clearly demonstrate that it is no longer appropriate or viable to continue the existing use through either a marketing exercise, a viability assessment or by demonstrating that their development would benefit the regeneration areas identified by the council as being in need of investment or would benefit the community of an area. As a result of this there have been some applications granted for uses not listed above (such as housing or larger scale retail).
- 8.4. Although they do not count towards our 'employment land requirement' it is considered important to carry out an audit of the BEAs and SEAs 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.
- 8.5. Appendix 1 contains a plan showing the distribution of the BEAs and SEAs currently, aerial images of each BEA and SEA and a brief description and recommendation as to their boundary going forward in the Local Plan. Table 7 below sets out a summary of those recommendations.

Business and Employment Area /	Recommendation for Draft Local Plan
Saddleworth Employment Area	
BEA 1 Wrigley Street BEA 2 Hawksley 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. 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.
BEA 3 Greengate/Broadgate	employment area.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 developments at Broadway Green 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. As such, 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.
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, split across two separate parcels. Remain as an employment area but exclude the land under construction for

Table 7: Recommendations for the BEAs and SEAs going forward in the Local Pan.

Business and Employment Area /	Recommendation for Draft Local Plan
Saddleworth Employment Area	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 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 measures 21.33 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, split across two separate parcels. 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 the uses located here and it is still an occupied employment area. Remain as an employment area.
SEA 1 Oak View Mills	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

Business and Employment Area / Saddleworth Employment Area	Recommendation for Draft Local Plan
SEA 4 Boarshurst Lane	 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 residential development. This SEA is located in Saddleworth South 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 employment area.
SEA 7 Valley Mills	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 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

Business and Employment Area / Saddleworth Employment Area	Recommendation for Draft Local Plan
	 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.

8.6. 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.

9. Recommendations and Next Steps

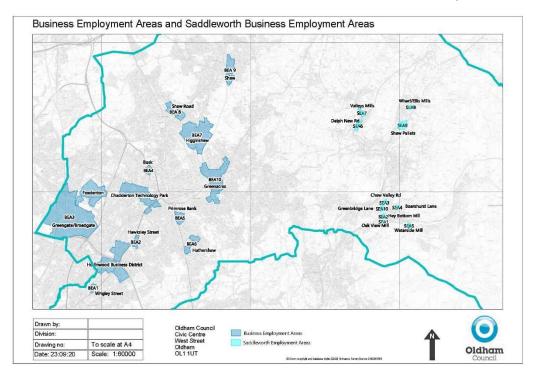
- 9.1. Based on the methodology carried out as part of this Draft ELR, Oldham has an employment land requirement of 53 hectares up to 2039. 12 hectares required for offices and 41 hectares required for industry and warehousing.
- 9.2. In addition, it is recommended that the Local Plan amend the BEAs and SEAs as set out in Table 7 to reflect the changes that have happened and are happening on the ground, this provides more accurate and defensible boundaries. If taken forward this results in one employment area (SEA 8 Shaw Pallets, Diggle) being de-designated and boundary changes to seven of the BEAs.
- 9.3. The next steps will be informed by feedback received on the draft Local Plan which includes the employment areas set out in Policy E1 and a number of proposed employment allocations in Policy E4. Further work to take these employment areas and employment allocations forward may be needed as work on the Local Plan progresses.

Appendix 1: Assessment of Business and Employment Areas and Saddleworth Employment Areas boundaries

Background

In Oldham's adopted Local Plan there are 23 Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) designated. These areas tend to be the focus for employment and commercial activity within the borough. This assessment will review the BEAs and SEAs and the boundaries to establish how fit for purpose they are going forward into new Local Plan.

The plan below shows the location of the BEAs and SEAs across the borough.



Boundary Assessment of the BEAs and SEAs

Below are a series of aerial images of each of the BEAs and SEAs in the borough. Any red colour hatched areas on the plans represent a part of the employment area that has either already been developed for a non-employment generating use or has well advanced plans to do so and therefore the recommendation is to exclude that part of the area from the BEA or SEA. Any blue colour hatched areas on the plans represent a potential addition to the boundary of the BEA or SEA.

Under each plan is a brief description of the BEA or SEA and a recommendation regarding how it should be carried forward in the new Local Plan.

BEA 1 Wrigley Street



This BEA is located in Failsworth East and measures 3.69 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 employment area.

BEA 2 Hawksley Street



This BEA is located in Hollinwood and measures 5.26 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 employment area.

BEA 3 Greengate/Broadgate



This BEA is located in Chadderton Central and Chadderton South and measures 185.89 hectares. 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 developments at Broadway Green the land remaining could be added to this BEA as it forms a more natural boundary. Remain as employment area and potentially add land from Foxdenton employment area.

BEA 4 Busk



This BEA is located in Coldhurst and measures 5.33 hectares. There has been some retail development within this area including an Aldi and a B&M store. These developments measure around 2.1 hectares and therefore there is around 3.23 hectares remaining. Remain as employment area but amend the boundary to remove the land developed for retail.

BEA 5 Primrose Bank



This BEA is located in Alexandra and measures 10.37 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 employment area.

BEA 6 Hathershaw



This BEA is located in Alexandra and Medlock Vale and measures 12.38 hectares. There has been a residential development measuring around 1.9 hectares for 98 homes built on the site of the former Maple Mill which is lies in the middle of the designation. This leaves around 10.48 hectares of the employment area available, split across two parcels. Remain as 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 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 employment area.

BEA 8 Shaw Road



This BEA is located in Royton South and measures 16.11 hectares. There have been residential developments on Edge Lane Street and work is under construction on the former Vernon Works site totaling around 4.9 hectares. This leaves around 11.21 hectares of the employment area available. Remain as employment area but exclude the land developed for and under construction for residential development.

BEA 9 Shaw



This BEA is located in Shaw and measures 21.33 hectares. There has been a residential development measuring around 12.45 hectares for 400 homes built 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 8.88 hectares of the employment area available, split across two separate parcels. Remain as 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 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 employment area.

SEA 1 Oak View Mills



This SEA is located in Saddleworth South and measures 0.44 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 employment area.

SEA 2 Hey Bottom Mil



This SEA is located in Saddleworth South and measures 1.49 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 employment area.

SEA 3 Chew Valley Road



This SEA is located in Saddleworth South and measures 1.79 hectares. There has been a housing development measuring around 0 7 hectares, this leaves 1.09 hectares remaining. Remain as employment area but exclude the land developed for residential development.

SEA 4 Boarshurst Lane



This SEA is located in Saddleworth South and measures 1.13 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 employment area.

SEA 5 Waterside Mill



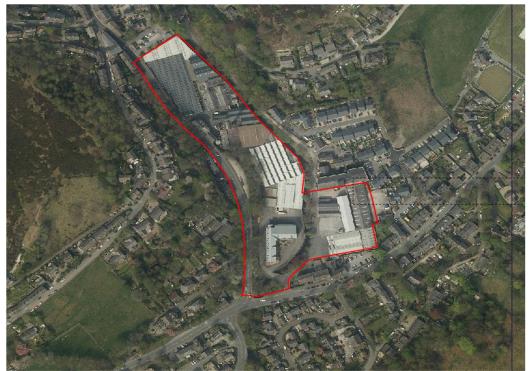
This SEA is located in Saddleworth South and measures 1.87 hectares. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. Remain as employment area.

SEA 6 Delph New Road



This SEA is located in Saddleworth North and measures 3.61 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 employment area.

SEA 7 Valley Mills



This SEA is located in Saddleworth North and measures 0.44 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 employment area.

SEA 8 Shaw Pallets



This SEA is located in Saddleworth North and measures 6.79 hectares. There has been a Secondary School developed on the back of the site and the front of the site now has planning permission for residential development. De-designate the employment area.

SEA 9 Warth and Ellis Mills



This SEA is located in Saddleworth North and measures 1.69 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 employment area.

SEA 10 (now BEA 23) 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 employment area.

Foxdenton



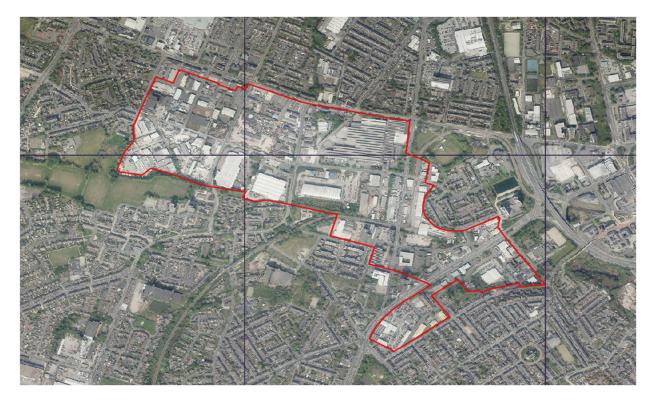
Foxdenton is approximately 45 hectares and is located within Chadderton Central. The site was designated as a mixed use employment led area. A large proportion of the site has now been developed or is under construction for residential and employment development. Recommend new boundary for the employment 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 hectares 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 employment area.

Chadderton Technology Park



Chadderton Technology Park is approximately 50 hectares 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 employment area.