

# Oldham Local Plan

**Publication Plan: Economy and Employment  
Topic Paper**

**January 2026**



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## 1. Introduction and Purpose

- 1.1. This is the Economy and Employment Topic Paper and is one of 13 topic papers produced to inform the consultation on the Oldham Local Plan: Publication Plan.
- 1.2. All Topic Papers can be found online at [Oldham Council's website<sup>1</sup>](https://www.oldham.gov.uk/info/201233/local_plan_review).
- 1.3. The main purpose of the Topic Paper is to set out:
  - the current key policies, plans and strategies relating to the economy that have informed the Local Plan;
  - the main issues, challenges and opportunities relating to the economy that we face in Oldham, underpinned by proportionate and relevant evidence;
  - how policies within the Oldham Local Plan: Publication Plan have been shaped, having regard to:
    - the key issues, challenges and opportunities facing the borough in relation to the economy;
    - responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions;
    - the outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment; and
  - how, with these policies, the Plan sets out an appropriate strategy that is based on proportionate evidence.
- 1.4. The Setting the Scene Topic Paper sets out the context for the Oldham Local Plan: Publication Plan, its purpose and how it relates to the Places for Everyone Joint Development Plan Document.
- 1.5. The Topic Papers therefore support and complement the Oldham Local Plan: Publication Plan, demonstrating how policy choices have been informed, providing transparency around decision-making, and assisting those viewing the Plan and the examining Inspector in understanding the rationale behind the Plan's content.

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<sup>1</sup> These documents can be found at: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review](https://www.oldham.gov.uk/info/201233/local_plan_review)

## 2. Relevant Policies, Plans and Strategies

2.1. This section sets out the main policies, plans and strategies that relate to the economy and which have informed the policy approach taken.

### National Context

#### National Planning Policy Framework

2.2 [National Policy Framework \(NPPF\)](#)<sup>2</sup> states that planning policies should help create the conditions in which businesses can invest, expand and adapt and 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. It goes on to say, in summary, that planning policies should:

- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;
- set criteria, and identify strategic sites, for local and inward investment to match the strategy
- pay regard to facilitating development to meet the needs of a modern economy;
- seek to address potential barriers to investment; and
- be flexible enough to accommodate needs not anticipated in the plan.

2.3 NPPF also goes on to outline how planning policies should recognize and address the specific locational requirement of different sectors and how planning policies should support a prosperous rural economy.

#### National Planning Policy Guidance – Housing and economic needs assessment (2015, updated 2025)

2.5 This [planning policy guidance](#)<sup>3</sup> sets out that in determining the type of employment land needed strategic policy making authorities will need to prepare a robust evidence base to understand existing business needs, and which will be kept under review to reflect local circumstances and market conditions. It goes on to say that national economic trends may not automatically translate to particular areas with a distinct employment base. It states that where appropriate the Authority Monitoring Report and the plan review process can be used to ensure that the evidence base remains up to date.

2.6 It also sets out the way to prepare and maintain evidence about business needs, stating that there is a need to liaise closely with the business community, taking account of the Local Industrial Strategy, to understand current and potential future requirements. It states that there is a need to assess:

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<sup>2</sup> National Planning Policy Framework (December 2024, as amended February 2025) available at: [https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

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

- 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;
- evidence of market demand;
- wider market signals relating to economic growth, diversification and innovation; and
- any evidence of market failure.

### **The UK's Modern Industrial Strategy (Department for Business and Trade, November 2025)**

2.7 The [UK's Modern Industrial Strategy<sup>4</sup>](#) sets out a blueprint designed to position the UK as a global leader in innovation, productivity, and sustainable growth. This strategy outlines a partnership between government and business to navigate the challenges and opportunities of a rapidly evolving global landscape.

2.8 The Strategy aims to:

- Deliver strong, secure, and sustainable economic growth.
- Provide certainty and stability for long-term investment.
- Create the conditions for future high-growth companies to emerge in the UK.
- Transition to clean energy, prepare for AI-driven industrial transformation, and deepen international trade partnerships.

2.9 It focuses on eight high – potential sectors that already outperform the wider economy in productivity and innovation:

- Advanced Manufacturing
- Clean Energy Industries
- Creative Industries
- Defence
- Digital & Technologies
- Financial Services
- Life Sciences
- Professional & Business Services

2.10 There is also a focus on foundational industries like steel and chemicals, while also aiming to tackle high energy costs, improving skills, reducing regulation, and securing supply chains to create better jobs and strengthen the economy.

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<sup>4</sup> The document can be found at:

[https://assets.publishing.service.gov.uk/media/69256e16367485ea116a56de/industrial\\_strategy\\_policy\\_paper.pdf](https://assets.publishing.service.gov.uk/media/69256e16367485ea116a56de/industrial_strategy_policy_paper.pdf)

## Greater Manchester Context

### Greater Manchester Strategy

2.11 [The Greater Manchester Strategy<sup>5</sup>](#) published in July 2025 sets out a vision for the next decade is to see a thriving city region where everyone can live a good life. The strategy contains seven workstreams which, together, will fix the foundations in life, make Greater Manchester a greener and more equal city region, help grow our economy and make sure everyone can live well.

2.12 Workstream four is, 'A clear line of sight to high-quality jobs', and within this workstream the strategy discusses its commitment from raising Greater Manchester's employment rate from 72% to 80%. It says it will do this by building people's confidence and basic skills to enable more people to consider moving into work. In addition, employers will get help to spot skills gaps and fast-track training in high-demand sectors like healthcare, construction, green industries and digital, so residents are ready for opportunities and businesses have the skills to deliver growth.

2.13 Workstream six is, 'A great place to do business', and within this workstream it says the strategy will kickstart a further decade of growth for Greater Manchester, delivering homes and employment sites on a scale and at a pace not seen this century, increasing productivity and innovation and ensuring our city region remains a great place to invest and do business. It names six growth locations - nationally significant sites with land earmarked and shovel-ready – including the North East Growth Corridor which includes Atom Valley, where a Mayoral Development Zone is driving the development of an advanced materials and manufacturing hub, connected to Materials and Robotics research assets in the Central Growth Cluster.

### Places for Everyone (PfE)

2.14. [Places for Everyone<sup>6</sup>](#) (PfE) Joint Development Plan Document (DPD), is a strategic plan that covers nine of the ten Greater Manchester districts - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Plan took effect and became part of the statutory development plan for each of the nine PfE authorities on 21 March 2024.

2.15. The most relevant PfE policies relating to the economy for Oldham are as follows:

2.16. **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. In addition, it states that improving transport connections and accessibility by public transport, cycling and walking will be a priority to ensure access to key employment opportunities.

2.17. **Policy JP- Strat7: North-East Growth Corridor** discusses how the North-East corridor will deliver a nationally-significant area of economic activity supported by a

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<sup>5</sup> This document can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/greater-manchester-strategy/>

<sup>6</sup> This document can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-adoption/>

significant increase in the residential offer. It identifies three major sites in the area which includes a site within Oldham (cross-boundary with Rochdale) called Stakehill.

2.18. 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 boroughs. 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, to enter into local labour and training agreements; and
- Maximising the potential of the key growth locations to deliver inclusive growth across the sub-region.

2.19. **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 important for 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.

2.20. **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 81,998m<sup>2</sup> of office floorspace and Table 6.2 states that Oldham has a supply 278,922 m<sup>2</sup> of industrial and warehousing floorspace for the plan period.

2.21. **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 includes 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)**

2.22 Greater Manchester's Local Industrial Strategy<sup>7</sup> (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 the 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 strategy is centred around two key aspects – the five foundations of productivity and four grand challenges.

2.23 Five foundations of productivity

- Ideas;
- People;
- Infrastructure;
- Business Environment; and
- Places.

2.24 Four Grand Challenges

- Health Innovation;
- Advanced Materials and Manufacturing;
- Digital, Creative and Media; and
- Clean Growth.

2.25 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.

2.26 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.

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<sup>7</sup> This document can be found at: <https://www.greatermanchester-ca.gov.uk/media/2132/gm-local-industrial-strategy-web.pdf>

## Local Context

2.27 A summary of the Oldham Partnership's Oldham Plan and the Council's Corporate Plan and how the Local Plan will help to deliver their missions and priorities is provided in the Setting the Scene Topic Paper. The sections below mainly focus on those parts of the plans relevant to the economy and employment theme.

### The Oldham Plan

2.28 [The Oldham Plan 2024-2030, Pride, Progress and Partnership](https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan)<sup>8</sup> sets out three clear missions to achieve by 2030 to deliver real improvements to the lives of Oldham people, Great Place to Live Healthier, Happier Lives and Green and Growing.

2.29 The Green and Growing mission is the most relevant for this topic paper. It is about making Oldham a place where economic growth benefits all residents, creating opportunities for businesses to succeed while ensuring our community and environment thrive. The relevant objectives are that:

- More local businesses will start, grow, and succeed, creating good jobs for residents.
- Every resident will see the benefit of Oldham's growing economy.
- Oldham will lead the way on green projects across the country.
- We'll support the growth of tech, green industries, and advanced manufacturing in the borough.

### Oldham Council Corporate Plan

2.30 [Oldham Council's Corporate Plan \(2024-2027\), Ready for the Future](https://www.oldham.gov.uk/info/200146/strategies_plans_and_policies/2888/corporate_plan)<sup>9</sup>, builds on the Oldham Plan and is focused on the same three goals – Healthier, Happier Lives, Great Place to Live and Green and Growing. The aim is that by fostering innovation, investing in people, and supporting our communities, we'll ensure Oldham remains a place where everyone can thrive. With strong leadership, commitment to our values, and ongoing improvement, we're ready to adapt to the changes in local government.

2.31 There are four focus areas that guide this plan and will help to achieve the goals:

- Efficiency and value for money
- Capacity building
- Digital
- Prevention and early help

2.32 Relevant to this economy and employment topic paper, the Plan sets out that, by 2027:

- We will attract new businesses and support existing ones to grow, creating more and better-quality jobs for local people;
- We will build on our reputation as a sector leader to maximise opportunities for green investment and jobs in the green economy; and

<sup>8</sup> This document can be found at:

[https://www.oldham.gov.uk/info/201261/oldham\\_plan/3207/oldham\\_plan](https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan)

<sup>9</sup> This document can be found at:

[https://www.oldham.gov.uk/info/200146/strategies\\_plans\\_and\\_policies/2888/corporate\\_plan](https://www.oldham.gov.uk/info/200146/strategies_plans_and_policies/2888/corporate_plan)

- There will be a revitalised and vibrant night-time economy that caters for residents and visitors alike.

### **Building a Better Oldham**

2.33 [Building a Better Oldham](#)<sup>10</sup> is the Council's ambitious transformation programme for the borough. It will unlock investment worth £285 million and create more than 2,000 new homes in Oldham town centre, 1,000 new jobs and 100 apprenticeship opportunities.

2.34 The vision of the programme is to create a town centre with character, with thousands of new homes and an emphasis on sustainability, community and quality – an inclusive and welcoming place to live and spend time in. A town centre that acknowledges Oldham's industrial heritage while looking towards a bright, modern future. With homes built in a safer and healthier environment and where we prioritise local jobs and learning opportunities for Oldham residents.

2.35 The key proposals set out in the [Oldham Town Centre Development Framework](#)<sup>11</sup> 2024 are:

- The introduction of up to 2,000 new homes located within safe, inclusive and attractive neighbourhoods.
- The redevelopment of Spindles Town Square Shopping Centre to redefine the retail core.
- The Green Shoots Business and Innovation Centre, and Minewater District Heat Network Energy Centre, which form part of the Council's Greener Oldham commitment.
- The re-use and refurbishment of several prominent heritage assets, specifically the Prudential Building, the Old Library and Gallery, and the Lyceum Building.
- Enhancing accessibility, connectivity and movement, providing sustainable infrastructure connections through the Accessible Oldham programme.
- The enhancement of the town centre's Green Infrastructure with the creation of Tommyfield Park and Snipe Gardens.
- Upgrading the night-time and creative economy, to make the town centre a destination of choice.

### **Levelling Up Oldham, The Oldham Economic Review of Economic Transformation and Civic Pride (March, 2022)**

2.36 The [Levelling Up Oldham](#)<sup>12</sup> report is an Economic Review, undertaken at the request of Oldham Council, with the remit to examine the town's approach to improving its economic prospects.

2.37 It set out a series of recommendations for Oldham including:

- The Long Game: Oldham must set out its long term ambitions and aspirations, with missions and targets for Oldham through to 2030.

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<sup>10</sup> More information can be found at:

[https://www.oldham.gov.uk/info/201248/building\\_a\\_better\\_oldham](https://www.oldham.gov.uk/info/201248/building_a_better_oldham)

<sup>11</sup> This document can be found at: <https://oldhamtownliving.co.uk/vision/>

<sup>12</sup> This document can be found at:

[https://www.oldham.gov.uk/downloads/file/8253/leveling\\_up\\_oldham\\_full\\_report](https://www.oldham.gov.uk/downloads/file/8253/leveling_up_oldham_full_report)

- Economic Purpose: Breaking Oldham’s dependence on “foundational economy” employment should be a central target in reshaping its long-term economic purpose.
- Business and Innovation: A clear strategy for productivity and business, all within a single strategic framework, with a clear set of missions and targets around improving productivity, increasing wages and boosting standards of living. Proactive engagement with neighbouring authorities in the Northern Gateway and liaise with Innovation GM for Oldham to play a leading role in extending the emerging innovation network in Greater Manchester. Develop a “best practice” programme for anchor institutions and a broader strategy for social enterprise.
- Skills and Jobs: Take a lead in setting the missions and targets for adult skills, with negotiation with local providers and GMCA. This should include the Council’s own analysis of the challenge of adult skills, and the levels of investment needed to make the borough competitive in the labour markets of Greater Manchester. Capacity build its general further education college to maximise its impact. Undertake a review of post-16 provision which assesses the positive and negative impacts of competition between providers throughout the post-16 phase. Oldham should pilot and adapt the Local Skills Improvement Plans model, addressing skills supply and demand in a much broader economic context including business support and innovation.
- Civic Pride and Sense of Place: Receive and act on the Institute for Place Management diagnostic report on ways that town centre management can be improved. Continue to work with partners from all sectors to enhance private sector engagement in the regeneration of the town centre and increase investment from all sources. Build on the Mill Strategy through a brownfield mill redevelopment project as a demonstrator of new technologies and materials (including environmental/net zero) of best practice and a site for future excellence in both high-level skills, apprenticeships and firm innovation. Review the potential for a stronger neighbourhood approach to those areas where multiple indicators appear to overlap and consider focussed partnerships to test out new approaches to improvement. Develop a strategic plan to protect and develop its key voluntary, community, cultural and sporting institutions, and a strategy for how they, along with the anchor institutions, can work together to build the foundations of the long-term transformational plan.
- Institutions: Recognise the mutual importance of the six capitals in driving improvements and develop a strategy to capacity build and support key institutions. Set up a new overarching ‘levelling up’ board, with independent representation, to oversee the delivery of the 2030 vision, with clear reporting around the local “levelling up”. Work with Greater Manchester partners to ensure transparency about the investment of resources and expertise into Oldham and the impact of these on Oldham’s levelling up vision for 2030. Work with the University and the College to develop a bespoke leadership and training programme.

## Oldham Mills Strategy

2.38 The [Oldham Mills Strategy](#)<sup>13</sup> (2021) 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. This work complements Historic England's wider project Mills of the North.

2.39 The Oldham Mills Strategy identifies the non-designated mills across Oldham which are of landscape and heritage value and sets out a robust strategy to ensure their sustainable future, which considers their potential for future development focussing on residential and employment uses.

2.40 The Mills Strategy sets out policy recommendations for the conservation of the mill stock based on levels of priority relative to the landscape and heritage value of individual mills. The strategy also sets out several actions to support the Council in ensuring the sustainable future of the mill stock.

2.41 The Mills Strategy assessed:

- Needs analysis (housing and employment)
- Landscape
- Heritage significance
- Housing potential
- Employment potential

2.42 The strategy then goes on to categorise individual mills as high, medium or low priority based upon the landscape, heritage and housing / employment assessments.

2.43 The key recommendations in relation to economy and employment was that a supportive environment should be developed in order to maximise the contribution that suitable mill sites within appropriate and attractive locations can make to supporting established and emerging key sectors.

2.44 It went on to suggest a marketing strategy could be developed collaboratively between bodies including Oldham Council, the Local Enterprise Partnership, mill owners, local business groups and other key stakeholders to promote the existing mill stock to accommodate key employment sectors and added that the Council should seek to work positively and proactively with mill owners and other key stakeholders in relation to individual mills that may become partly or fully vacant in the future to develop individual mill-specific strategies to support the active re-use of the building in question.

2.45 Finally, the 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, such as the provision of residential uses, as due to the age, scale, format and condition of former mill buildings, it may not be economically viable to secure the repurposing of individual mills to provide modern, fit for purpose employment / commercial floorspace.

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<sup>13</sup> This document can be found at:

[https://www.oldham.gov.uk/info/201236/evidence/2819/oldham\\_mills\\_strategy](https://www.oldham.gov.uk/info/201236/evidence/2819/oldham_mills_strategy)

## **Oldham Green New Deal Strategy**

2.46 The [Oldham Green New Deal Strategy](#)<sup>14</sup> was adopted by the Council in March 2020. The Strategy's objective is to 'Future-proof the regeneration of the borough by establishing Oldham as an exemplar Green City on energy, carbon, water and green infrastructure'. The Strategy puts in place a framework to work with our residents and partners to make Oldham an even greener, smarter, more enterprising place.

2.47 The Green New Deal Strategy sets out the Council's approach to achieving these targets, enabled by the development of, and investment in, the 'green' sector in Oldham's local economy.

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<sup>14</sup> The Green New Deal Strategy is available at: <https://www.oldham.gov.uk/gnds>

### 3 Issues, challenges and opportunities relating to Economy and Employment

3.1 This section summarises the main issues, challenges and opportunities relating to the Economy and Employment that we face in Oldham, underpinned by proportionate and relevant evidence.

**There is the need to ensure all of Oldham's residents' benefit from economic growth.**

3.2 As set out in Oldham's Corporate Plan<sup>15</sup> our ambition is to make Oldham a place where economic growth benefits all residents, creating opportunities for businesses to succeed.

3.3 The unemployment rate in Oldham currently stands at 6.8%, compared to 5% within Greater Manchester and 4.1% in England<sup>16</sup>. Oldham's overall rank in the [indices of deprivation](#)<sup>17</sup> has maintained a clear downward trend since 2004, relative to other authorities. In addition, the median household income for Oldham in 2025 was £32,662, which is below Greater Manchester (£35,242) and national (£39,597) levels<sup>18</sup>.

3.4 By attracting new investment, supporting local businesses and leading in green technologies we will generate quality job opportunities and equip people with the skills they need to succeed.

**There is a need to ensure that the potential of the boroughs key economic sectors is maximised.**

3.5 In the past, Oldham's economy has failed to benefit fully from growth at a Greater Manchester level in many ways, including business start-ups, Gross Domestic Product, wages and skills levels.

3.6 The '[Levelling Up Oldham](#)'<sup>19</sup> paper produced by the Oldham Economic Review Board in March 2022 estimated that in 2020 the share of the local workforce working in the foundational economy could have been as high as 70% of all workers.

3.7 Plan Objective 3 in PfE outlines the key economic sectors in Greater Manchester as being:

- Advanced manufacturing;
- Business, financial and professional services;

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<sup>15</sup> This document can be found at:

[https://www.oldham.gov.uk/info/200146/strategies\\_plans\\_and\\_policies/2888/corporate\\_plan](https://www.oldham.gov.uk/info/200146/strategies_plans_and_policies/2888/corporate_plan)

<sup>16</sup> ONS Claimant Count, August 2025. This information can be viewed at: CC01 Regional labour market: Claimant Count by unitary and local authority (experimental) - Office for National Statistics (ons.gov.uk)

<sup>17</sup> The English Indices of deprivation 2025 can be found at:

<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2025>

<sup>18</sup> CACI, 2025

<sup>19</sup> This document can be found at: [oerb.org.uk/wp-content/uploads/2022/03/ING6167\\_UoFM\\_Levelling-up-Oldham-22-03-22.pdf](http://oerb.org.uk/wp-content/uploads/2022/03/ING6167_UoFM_Levelling-up-Oldham-22-03-22.pdf)

- Creative and digital;
- Health innovation; and
- Logistics

3.8 In addition, there is also a need to ensure that we are supporting and promoting the Council's ambitions regarding the building of the Green Technologies and Services sector (GTS). This will include supporting companies who are looking for opportunities to develop sustainable, environmentally friendly materials; decarbonise energy; tap digital innovation for doing more with less; and extend the life cycle of goods within a "zero waste to landfill" framework.

3.9 To make a shift from an overreliance on a foundational economy, our employment areas must be attractive to the key economic sectors going forward so we can support and promote their growth in Oldham.

**There is a need for Oldham to contribute towards achieving the overall employment floorspace requirements set out in PfE policies JP-J3 and JP-J4.**

3.10 PfE establishes the quantitative floorspace requirements for industrial and warehousing and office development across the PfE plan area over the period 2022 to 2039 and seeks to ensure a distribution of development that helps to achieve the strategic economic priorities for Greater Manchester. The requirements are for at least 2,019,000m<sup>2</sup> of office floorspace and 3,513,000 m<sup>2</sup> of industrial and warehousing floorspace, across the PfE plan area.

3.11 A strategic priority of PfE includes the aim to rebalance the Greater Manchester economy by boosting the economic output of the northern districts and the identification of the Northern East Growth Corridor strategic employment site to help to achieve this. The North East Growth Corridor, which extends eastwards from Junction 18 to 21 of the M62 to include parts of Bury, Rochdale and Oldham and incorporates the Atom Valley Mayoral Development Zone, will deliver a nationally-significant area of economic activity.

3.12 In Oldham this includes Stakehill (PfE Policy JPA 2) which will deliver around 150,000 m<sup>2</sup> of high quality, adaptable industrial and warehousing floorspace within the 'green' employment park with a focus on suitable provision for advanced manufacturing and/or other key economic sectors. It is also important that policies within the Oldham Local Plan help to enhance connectivity between these wider employment opportunities and beyond for our residents.

## 4. Economy and Employment and the Oldham Local Plan: Publication Plan

- 4.1 This section of the Topic Paper looks at each of the policies contained in the Economy and Employment chapter of the Oldham Local Plan: Publication Plan.
- 4.2 For each policy the Topic Paper shows how policies within the Oldham Local Plan: Publication Plan have been shaped to provide an appropriate strategy for the borough that is based on proportionate evidence and having regard to:
  - The key issues, challenges and opportunities facing the borough in relation to the economy and employment;
  - Responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions; and
  - The outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment.

### Policy E1: Employment Floorspace Requirements

#### Summary of evidence

- 4.3 There is a need for Oldham to contribute towards achieving the overall employment floorspace requirements set out in PfE policies JP-J3 'Office Development' and JP-J4 'Industry and Warehousing Development'. The policies set out the requirements of at least 2,019,000 m<sup>2</sup> of office floorspace and 3,513,000 m<sup>2</sup> of industrial and warehousing floorspace, to be provided across the PfE plan area by 2039.
- 4.4 Within PfE, tables 6.1 (JP-J3) and 6.2 (JP-J4) set out the distribution of the identified supply for offices and industry and warehousing across each of the PfE districts. However, PfE does not set out distributed requirements for offices and industry and warehousing floorspace for each district. The Reasoned Justification of JP-J3 and JP-J4 explained that the approach taken in each of the policies was to allow each authority to take local circumstances into account when drafting their Local Plans. It goes on to say that to ensure the overall strategy is being adhered to, there will be a need for monitoring at the Plan, district and spatial strategy level to ensure the existing supply, including allocations, is providing sufficient land to meet quantitative and qualitative needs.
- 4.5 The PfE [Employment Topic Paper](#)<sup>20</sup> and the [Employment Land Needs in Greater Manchester](#)<sup>21</sup> paper that were used to support PfE, set out the approach that was taken in relation to calculating to employment land requirements for the Joint Plan. They both explain that the approach was based on using past completions, with some modest re-weighting, and extrapolating the annual figure forward over the plan

<sup>20</sup> This document can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-previous-stages/places-for-everyone-2021-regulation-19/supporting-documents-2021/?folder=05%20Places%20for%20Jobs#fList>

<sup>21</sup> The document can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-previous-stages/places-for-everyone-2021-regulation-19/supporting-documents-2021/?folder=05%20Places%20for%20Jobs#fList>

period. In addition, a five year buffer was included to address matters of uncertainty and provide a degree of flexibility. This approach was deemed an effective basis on which each district can plan for employment land.

#### Draft Local Plan consultation and Duty to Co-operate

4.6 Publication Plan Policy E1 is a new policy so was not subject to the Draft Plan consultation.

#### Policy Approach

4.7 As the policy context has shown there is a need to ensure Oldham contributes to the employment floorspace requirements set out in PfE and a policy setting out Oldham's requirement is considered the most effective way in which to demonstrate this.

4.8 Policy E1 Employment Floorspace Requirements, focuses on determining the amount of overall employment floorspace Oldham will provide over the period 2022 – 2039 and the Reasoned Justification explains how the requirement was calculated and why it is appropriate. This is also explained in further detail below in paragraphs 4.11 to 4.15.

4.9 As mentioned above, no employment floorspace requirements were set at a district level in PfE, therefore, to ensure that Oldham makes a sufficient contribution to meeting the overall employment requirements identified in the Joint Plan an appropriate methodology has been applied to determine an Oldham employment floorspace requirement.

4.10 There is no prescribed methodology for identifying employment land requirements. Therefore, the methodology used to inform Policy E1, is that which was put forward by the nine PfE districts through main modifications proposed during the examination of the plan<sup>22</sup>. Ultimately, the inspectors determined that such a modification was not necessary to make PfE sound, however this approach is considered an appropriate methodology to quantify how Oldham will contribute towards the requirements set out in PfE and to enable monitoring of the PfE policies.

4.11 The methodology used to calculate the figure in Policy E1 was:

- Calculating Oldham's proportion of the total supply of office and industry and warehousing floorspace across the 9 districts as shown in PfE tables 6.1 (JP-J3) and 6.2 (JP-J4); and
- Applying this proportion to the overall office and industry and warehousing requirement figures in PfE policies JP-J3 and JP-J4.

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<sup>22</sup> This document can be found at: [https://www.hwa.uk.com/site/wp-content/uploads/2022/10/Proposed-PfE-employment-land-requirement-calculation\\_Nov2022-1.pdf](https://www.hwa.uk.com/site/wp-content/uploads/2022/10/Proposed-PfE-employment-land-requirement-calculation_Nov2022-1.pdf)

4.12 This methodology is set out in Table 1 below.

**Table 1: Methodology used to calculate Oldham's employment land requirement**

	Total PfE supply	Total Oldham (only) supply	Oldham's supply as a % of PfE total supply	Minimum PfE Requirement	Oldham's 'Requirement' based on % of PfE supply
<b>Office</b>	2,880,150	81,998	3%	2,019,000	57,481
<b>Industry and Warehousing</b>	4,100,571	278,922	7%	3,513,000	240,656

4.13 Table 1 shows that Oldham has 3% of PfE's office supply and 7% of PfE's industry and warehousing supply, these percentages were then applied to the PfE requirement to give an Oldham requirement of providing at least 57,481 m<sup>2</sup> of office (E(g)(i)) floorspace and at least 240,656 m<sup>2</sup> of industrial and warehousing (B2 and B8) floorspace over the plan period.

4.14 [Oldham's Monitoring Reports](#)<sup>23</sup> show, that between the start of the PfE plan period (2022/23) and 2024/25 (the most recent monitoring period), 20,927 m<sup>2</sup> of office floorspace and 64,723 m<sup>2</sup> sqm of industry and warehousing floorspace has been completed in Oldham.

4.15 For monitoring purposes, this means that for the remainder of the plan period (2025/36 to 2038/39), Oldham should provide at least:

- 36,554 m<sup>2</sup> sqm of office floorspace; and
- 175,933 m<sup>2</sup> of industry and warehousing floorspace.

4.16 Appendix 1 'Employment Land Supply Evidence' (presented in a separate document), shows Oldham's identified employment land supply (as at April 2025<sup>24</sup>) and this sets out that the there is an identified supply in Oldham for:

- 62,690 m<sup>2</sup> of office floorspace; and
- 222,880 m<sup>2</sup> of industry and warehousing floorspace.

4.17 The identified employment land supply shown in Appendix 1 is made up of sites that are under construction for office and / or industry and warehousing, sites with planning permission for office and / or industry and warehousing, sites allocated for employment with PfE and sites that were allocated for office and / or industry and warehousing in the Unitary Development Plan (UDP) and 'saved'<sup>25</sup> when the Joint Core Strategy and Development Plan Document (the Joint DPD) was adopted in 2011.

<sup>23</sup> These documents can be viewed at:

[https://www.oldham.gov.uk/info/201230/monitoring/263/oldhams\\_monitoring\\_report](https://www.oldham.gov.uk/info/201230/monitoring/263/oldhams_monitoring_report)

<sup>24</sup> The employment land supply is updated annually and published by GMCA at:

<https://mappinggm.org.uk/data/>

<sup>25</sup> This document can be found at:

[https://www.oldham.gov.uk/info/201229/current\\_local\\_planning\\_policy/1005/saved\\_unitary\\_development\\_plan\\_policies](https://www.oldham.gov.uk/info/201229/current_local_planning_policy/1005/saved_unitary_development_plan_policies)

4.18 It is important to note that the identified employment land supply does have some assumptions built into it. In relation to whether the site has been included as having potential for office development or industry and warehousing development, this information has been taken from planning applications where it has been stated. However, in some cases the applications have been approved for a mix of office, industry and warehousing floorspace and a breakdown has not been provided. In these cases, where it is not clear what the split will be we have split the figure in half between industry / warehousing and offices. In some cases, there have been no applications submitted as yet, so in these instances the area of the sites has been converted to square metres using a standard plot ratio of 40%.

4.19 Another assumption that has been made is in relation to when the sites are expected to be completed. A lot of the supply has been estimated to come forward in the first five years of the plan, this is due to the fact that a large number of them already have planning permission and some are currently under construction. In addition, a number of the sites have been allocated in the UDP<sup>26</sup> and therefore there is a presumption that they will be suitable for employment land development. This supply is reviewed annually, so new sites that gain permission will be added and their progress monitored going forward. There are two sites which are estimated to come forward later on in the plan period, they are OLD0182 Stakehill and OLD0183 Broadbent Moss. Both of these sites are PfE Strategic Allocations, and their inclusion in a later time period is due to the level of infrastructure needed to service the sites.

4.20 Whilst the employment land supply is indicative and subject to change, especially when projecting into the medium and long-term periods it demonstrates that Oldham has enough sites to meet our minimum employment floorspace requirement and offers a margin of flexibility. Therefore, Policy E1 is considered to set out a deliverable, realistic and achievable requirement for Oldham.

#### Integrated Assessment

4.21 Policy E1 scored predominantly neutrals with some positive and significantly positive scores in the Integrated Assessment. Some effects were cross boundary and others were local. No mitigation or enhancements to the policy were required as a result of the IA.

4.22 In terms of the HRA the policy has been screened in, as there may be possible impacts from direct land take and increases in diffuse air and water pollution. The HRA identifies mitigation measures to address any likely significant effects.

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<sup>26</sup> The remaining Saved UDP Business and Industry and Business and Office Allocations will be de-designated as part of the new Local Plan. However, at 1 April 2025 they were still 'saved'. Once they are de-designated these sites will, where appropriate, be presented in other relevant categories i.e. 'Potential Sites', in future employment land supply updates.

## Policy E2: Business and Employment Areas

### Summary of evidence

- 4.23 In Oldham's Core Strategy there are 23 Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) designated in policies 13 and 14. These sites are spread across the borough and support a range of businesses providing land for existing firms to expand and for new firms to locate in Oldham, so providing for job opportunities. These areas are crucial in helping us meet the needs of our changing local economy.
- 4.24 As part of this Publication 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).
- 4.25 As a result of these boundary reviews several amendments have been made to the Core Strategy designated BEAs and SEAs. In addition, the BEAs and SEAs will now all be known as Business and Employment Areas going forward. A summary of each reviewed BEA, including any boundary changes, de-designation or name and reference number amendments is summarised in Table 2 overleaf and any amendments to boundaries can also be viewed in Appendix 4 of the Publication Plan.

**Table 2: Business and Employment Areas – including any amendments**

Joint DPD Business and Employment Area / Saddleworth Employment Area Reference and Name	Publication Local Plan Reference and Name	Description and Amendments
BEA 1 Wrigley Street	BEA 1 Wrigley Street	This employment area is located in Failsworth East and measures 3.70 hectares (ha). There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. No amendments made.
BEA 2 Hawksley Street	BEA 2 Hawksley Street	This employment area 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. No amendments made.
BEA 3 Greengate/Broadgate	BEA 3 Greengate/Broadgate	This employment area is located in Chadderton Central and Chadderton South and in the Core Strategy it measured 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. However, on reviewing the boundaries it was noted that on Foxdenton Lane there was an industrial unit to the east of the employment area that sat just outside the boundary. This unit has been included within the BEA boundary in the Publication Local Plan and the employment area now measures 188.33 ha.
BEA 4 Busk	BEA 4 Busk	This employment area is located in Coldhurst and in the Core Strategy it measured 5.33 ha. Since the Core Strategy was adopted there has been some significant retail development within this BEA, including an Aldi and a B&M store. Therefore, on reviewing the boundaries these retail units have been excluded from the BEA boundary in the Publication Local Plan and the employment area now measures 3.02 ha.
BEA 5 Primrose Bank	BEA 5 Primrose Bank	This employment area is located in Alexandra and measures 10.38 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. No amendments made.

Joint DPD Business and Employment Area / Saddleworth Employment Area Reference and Name	Publication Local Plan Reference and Name	Description and Amendments
BEA 6 Hathershaw	BEA 6a Hathershaw and BEA 6b Hathershaw	<p>This employment area is located in Alexandra and Medlock Vale and in the Core Strategy it measured 12.38 ha. Since the Core Strategy was adopted there has been a residential development measuring around 1.9 ha for 98 homes built on the site of the former Maple Mill which lay in the middle of the designation. Therefore, on reviewing the boundaries this residential development has been excluded from the BEA boundary in the Publication Local Plan and the BEA has been split into two. BEA 6a now measures 5.43 ha and BEA 6b now measures 4.92 ha.</p>
BEA 7 Higginshaw	BEA 7 Higginshaw	<p>This employment area is located in Royton South and St Mary's and in the Core Strategy it measured 76.72 ha. Since the Core Strategy was adopted there has been a residential development measuring around 3.11 ha for 98 homes has been built on land in the north of the area, near Hebron Street and part of the land at Royton Moss now forms part of PfE allocation JPA12 Broadbent Moss. Therefore, on reviewing the boundaries these areas have been excluded from the BEA boundary in the Publication Local Plan and the employment area now measures 73.14 ha.</p>
BEA 8 Shaw Road	BEA 8 Shaw Road	<p>This employment area is located in Royton South and in the Core Strategy it measured 16.11 ha. Since the Core Strategy was adopted there have been residential developments completed on Edge Lane Street and Vernon Works for residential, totaling around 4.9 ha. Therefore, on reviewing the boundaries these areas have been excluded from the BEA boundary in the Publication Local Plan and the employment area now measures 11.20 ha.</p>
BEA 9 Shaw	BEA 9 Shaw and BEA 10 Linney Lane	<p>This employment area is located in Shaw and in the Core Strategy it measured 21.33 ha. Since the Core Strategy was adopted there has been a residential development measuring around 12.9 ha for 400 homes granted in the middle of the site, which is now under construction. Therefore, on reviewing the boundaries this residential development has been excluded from the BEA boundary in the Publication Local Plan and the BEA has been split into two. The BEA 9 now measures 1.8 ha and BEA 10 now measures 6.73 ha.</p>

Joint DPD Business and Employment Area / Saddleworth Employment Area Reference and Name	Publication Local Plan Reference and Name	Description and Amendments
BEA 10 Greenacres	BEA 11 Greenacres	This employment area is located in St James' and St Mary's and measures 61.60 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. No amendments made other than the reference number.
SEA 1 Oak View Mills	BEA 15 Oak View Mills	This employment area 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. No amendments made other than the reference number.
SEA 2 Hey Bottom Mill	BEA 16 Hey Bottom Mill	This employment area is located in Saddleworth South and measures 1.5 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. No amendments made other than the reference number.
SEA 3 Chew Valley Road	BEA 17 Chew Valley Road	This employment area is located in Saddleworth South and in the Core Strategy it measured 1.79 ha. Since the Core Strategy was adopted there has been a housing development measuring around 0.7 ha hectares built towards the rear of the site. Therefore, on reviewing the boundaries these areas have been excluded from the BEA boundary in the Publication Local Plan and the employment area now measures 1.04 ha.
SEA 4 Boarhurst Lane	BEA 18 Boarhurst Lane	This employment area 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. No amendments made other than the reference number.
SEA 5 Waterside Mill	BEA 19 Waterside Mill	This employment area 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. No amendments made other than the reference number.
SEA 6 Delph New Road	BEA 20 Delph New Road	This employment area 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. No amendments made other than the reference number.

Joint DPD Business and Employment Area / Saddleworth Employment Area Reference and Name	Publication Local Plan Reference and Name	Description and Amendments
SEA 7 Valley Mills	BEA 21 Valley Mills	This employment area is located in Saddleworth North and measures 2.86 ha. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. No amendments made other than the reference number.
SEA 8 Shaw Pallets	N/A – de-designated	This employment area is located in Saddleworth North and in the Core Strategy it measured 6.79 ha. Since the Core Strategy was adopted a Secondary School has been developed on the rear of the site and the front of the site is under construction for residential development. The employment area is no longer available and therefore the designation has been deleted.
SEA 9 Warth and Ellis Mills	BEA 22 Warth and Ellis Mills	This employment area 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. No amendments made other than the reference number.
SEA 10 Greenbridge Lane	BEA 23 Greenbridge Lane	This employment area is located in Saddleworth South and measures 1.60 hectares. There have been no significant changes to the nature of the uses located here and it is still an occupied employment area. No amendments made other than the reference number.
Foxdenton	BEA 13 Broadway Green	This employment area measured approximately 45 ha and was designated as a mixed-use employment led area in the Core Strategy. It is located within Chadderton Central. Since the Joint DPD was adopted a large proportion of the site has now been developed or is under construction for residential and employment development and an Aldi store has also been built. Therefore, on reviewing the boundaries the residential and the retail areas have been excluded from the BEA boundary in the Publication Local Plan. In addition, in response to the consultation feedback at Draft Local Plan stage, the land to the south of Foxdenton Lane has also been removed from the employment area. The employment area has been renamed Broadway Green and now measures 16.12 ha.

Joint DPD Business and Employment Area / Saddleworth Employment Area Reference and Name	Publication Local Plan Reference and Name	Description and Amendments
Hollinwood Business District	BEA 12 Hollinwood Business District	This employment area measured approximately 70 ha in the DPDCore Strategy and is located within the wards of Failsworth East, Hollinwood and Chadderton South. Since the Joint DPD was adopted a Lidl store has been built at Albert Street. Therefore, on reviewing the boundaries this retail units have been excluded from the BEA boundary in the Publication Local Plan and the employment area now measures 66.25 ha.
Chadderton Technology Park	BEA 14 Chadderton	This employment area measured 53.67 ha in the Core Strategy and is located 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. No amendments made other than the reference name and number.

## Draft Local Plan consultation and Duty to Co-operate

4.26 At Draft Plan stage comments and suggested amendments to the policy were received, which are summarised in Table 3 below. Please note, at Draft Plan stage the policy was numbered as Policy E1.

**Table 3: Summary of comments received and the Council's response to Policy E1 Business and Employment Areas**

Respondent	Summary of Comment	Council Response
Natural England	Recommend that wording within Policy E1 outlines allocations which will require a project level Habitats Regulations Assessment (HRA) in line with finding of the HRA of the Oldham Draft Local Plan 2022-2039 in regard to Rochdale Canal SAC.	Comments noted and considered as part of the Publication Plan HRA.
Asteer Planning on behalf of Saddleworth Property Partnership (SSP)	Provided information regarding the economic performance of Saddleworth Business Centre which forms a small part of the Valley Mills employment area, and to request that the Council considers de-designating that part of BEA21 for employment uses and consider its allocation for residential development.	No amendment made to the policy. The policies in the Economy and Employment chapter of the Publication Plan, allow for uses other than the employment uses listed, to be permitted in certain circumstances as part of the planning application process.
United Utilities	Note the allocation of numerous business and employment areas and that this policy identifies those uses that will be acceptable in these areas. Between the 6th and 7th points there is a policy caveat that appears to relate to the uses specified in points 7 to 12. Reflecting the agent of change principle, wish to note that the functionality of any existing business or use should not be compromised by a newly proposed use. Request the agent of change principle is clearly reflected in this policy.	No amendment made to the policy. Policy LE1 'Ensuring a High Standard of Amenity in New Development' makes explicit reference to the 'agent of change' in relation to new development. Amendment not considered necessary.
Chadderton Together	The allocation of land off Foxdenton Lane for employment is inappropriate as the land is undulating and is surrounded by residential properties. It cannot accommodate large scale industrial units but could accommodate residential including specialist residential and some small-scale employment uses such as office uses.	Since the Draft Local Plan consultation, it has been decided to remove allocations from the Local Plan and instead support focus the policies on supporting the delivery of PfE in Oldham. Providing more detailed local level 'development management' policies that support the strategic policies in PfE. Therefore, the allocations policy has been deleted and in response to comments received as part of the consultation the land at Foxdenton

Respondent	Summary of Comment	Council Response
		Lane has also been removed from the BEA.
TfGM	Support the policy. The uses that will be permitted within the BEAs include transport and transport related uses (including garages, scarp yards, car show rooms, taxi companies) – Sui Generis. It is assumed that this list is not exhaustive and could also include bus depots and EV charging related to a specific business use such as Electric Bus charging in depot.	Support noted. The list of transport and transport-related uses is not exhaustive.
National Highways	It is noted that a large proportion of the BEAs are located near to the M60 and A627(M) and as highlighted within the Statement of Common Ground, these sites will need to be assessed in detail to form the Local Plan transport evidence base. It is essential that National Highways are consulted with due consideration applied to the cumulative impact these assets may have on the SRN, particularly for freight movements.	Comment noted. The BEAs are all existing employment areas and any concerns in relation to development within them will be addressed through Policy T5: Vision-led Transport Statements, Transport Assessments and Travel Plans in New Development.
Historic England	The introductory text (9.1 - 9.5) would benefit from mention of the mills work undertaken.	Comment noted and Oldham Mills Strategy now including in introductory text.
Julie Ball	No mention of the low skilled, low paid warehousing jobs to be created at Stakehill other than saying the document must be read in conjunction with PfE documentation.	Comment noted. The Local Plan should be read in conjunction with PfE. JPA2 Stakehill is an allocation within PfE and that policy sets out the detail of how the site will be developed, including the uses permitted.

4.27 A detailed summary of the responses received can be found at 'Schedule of Comments and the Council's Response' document.

4.28 Oldham Council met with National Highways on 9 July 2025 to discuss comments submitted at Draft Local Plan stage, this included the comments in relation to BEAs. National Highways were satisfied with the response provided.

#### Policy Approach

4.29 As set out previously, it was important to carry out an audit of the boundaries of our designated employment areas to ensure we had an up to date and accurate picture of Oldham's employment land and premises offer and ensure we were protecting appropriate areas in the policy.

4.30 Policy E2 Business and Employment Areas, focuses on the borough's designated, established employment areas. It highlights their importance in supporting the local

economy, sets out their names and reference numbers and the uses that may be permitted within them. It also sets out that permitted change of use rights for other Class E uses (other than those listed) will be withdrawn by condition of planning permission.

- 4.31 The BEAs will help meet the needs of our changing local economy. They provide land for existing firms to expand and for new firms to locate here, so providing job opportunities. Protecting the BEAs for employment uses provides businesses with a degree of certainty as to the future use of these areas, avoiding the introduction of conflicting land uses and they have an important part to play in retaining local employment opportunities.
- 4.32 Since the Draft Local Plan consultation, the main changes made were in relation to the uses permitted within the BEAs. A more streamlined list of uses more commonly associated as 'employment uses' were included in the policy, with uses such as creches, restaurants and health facilities no longer permitted. In addition, it was added to the policy that permitted change of use rights for other Class E uses (other than those listed) will be withdrawn by condition of planning permission. This change was made as Planning Use Class E includes a variety of uses that have permitted development rights and the GPDO (part 7) contains various permitted development rights, including for shops, offices, GPs, cafés and restaurants. In order to ensure that changes of use would not materially impact on the nature and function of the employment area or their economic potential, it was considered necessary to withdraw these permitted development rights using conditions through the planning application process, as appropriate.
- 4.33 In addition, there were additional boundary changes made to the BEAs (changes to boundaries are set out in Appendix 4 of the Publication Plan) based on feedback received as part of the Draft Plan consultation and to consider the impacts of any relevant developments.
- 4.34 The Reasoned Justification highlighted that our BEAs will help meet the needs of our changing local economy as they provide land for existing firms to expand and for new firms to locate here, so providing job opportunities. It also goes on to explain in more detail why will be necessary to withdraw some Class E permitted development rights using conditions.

#### **Integrated Assessment**

- 4.35 Policy E2 scored a mixture of neutral, positives and significantly positive scores in the Integrated Assessment. Some effects were cross boundary, but the majority were local. No mitigation or enhancements to the policy were required as a result of the IA.
- 4.36 In terms of the HRA the policy has been screened out as there is no likely significant effect on any European Site anticipated from the operation of this Policy.

## **Policy E3: Exceptions within Business and Employment Areas and Policy E4: Employment sites outside of Business and Employment Areas**

### **Summary of evidence**

- 4.37 NPPF states that planning policies should help create the conditions in which businesses can invest, expand and adapt and that policies should be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.
- 4.38 These two policies are flexible as they allow, in certain circumstances, for uses other than those listed within Policy E2. The information required to support the justification for the loss of the employment site to other uses is different depending on the if the site is within a designated BEA or outside of one.

### **Draft Local Plan consultation and Duty to Co-operate**

- 4.39 At Draft Plan stage these two policies were one policy, and it was referred to as Policy E2 'Exceptions within Business and Employment Areas and other existing employment sites'.
- 4.40 Two comments were received to the Draft Plan consultation; one offered general support for the policy and the other was from National Highways requesting that they are consulted on any applications that will have a potential impact on the Strategic Road Network. It was not considered necessary to amend the policy to address National Highways comments as Policy T1 'Delivering Oldham's Transport Priorities' sets out that any development that may impact the Strategic Road Network (SRN) should involve National Highways at the earliest opportunity.
- 4.41 A detailed summary of the responses received can be found in the 'Schedule of Comments and the Council's Response' document.
- 4.42 Oldham Council met with National Highways on the 9<sup>th</sup> July 2025 to discuss comments submitted at Draft Local Plan stage, this included the comments in relation to the SRN. National Highways were satisfied with the response provided.

### **Policy Approach**

- 4.43 As set out in the policy context it is important that economic planning policies help create the conditions in which businesses can invest, expand and adapt but they should also be flexible enough to accommodate needs not anticipated in the plan.
- 4.44 Policies E3 'Exceptions within Business and Employment Areas' and E4 'Employment sites outside of Business and Employment Areas' outlines the circumstances in which uses other than those listed in Policy E2 may be permitted within designated employment areas (Policy E3) and undesignated employment areas (Policy E4).
- 4.45 For sites within BEAs, the information expected to be submitted to the Council to satisfy Policy E3 is one of the following:

- The site and premises have been subject to a detailed marketing appraisal, for a period of not less than 12 months, that clearly demonstrates that there is no current or likely future demand for them to continue for any of the above employment or commercial uses; or
- 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; or
- The site is required for a facility or infrastructure meeting a regional or national need and there is no more suitable alternative site within the borough of Oldham; or
- The site and premises are no longer suitable for the existing use when taking into account the modern needs of businesses for highways access, site location, infrastructure, physical constraints, environmental considerations or neighbour amenity issues.

4.46 In addition to meeting one of the above criteria, the applicant would also need to submit a statement outlining that the proposal meets both of the following criteria:

- That there is a clear need for the proposed land use; and
- That the proposed redevelopment would not compromise the primary function and operations of neighbouring users

4.47 The Reasoned Justification's in both policies provide more information as to what the Council would expect to be submitted to accompany applications for non-employment generating uses in these areas.

4.48 In relation to existing employment sites outside of the designated BEAs, Policy E4 states that where the applicant has demonstrated that an employment site is unsuitable, in land use terms, the Council will give favourable consideration to alternative uses. However, in instances where an existing site is still considered a suitable employment location, an applicant will be required to provide evidence to show that the re-use of the site for employment purposes is not commercially viable. In doing this, evidence that the site has been robustly marketed for a minimum of 12 months at a realistic value should be supplied to demonstrate that there is no reasonable prospect of the site (either in full or part) continuing to be used for employment purposes under current market conditions.

4.49 Neither policies relate to proposals for the loss of an employment on a mill site, as these proposals are considered under Policy E5 'Reuse and redevelopment of Mill Buildings'.

4.50 These policies provide a flexible framework as the Council recognises that there are instances that can arise when uses other than those listed within Policy E2 may be appropriate within the BEAs and on other employment sites. The policies outline a proportionate and appropriate framework that ensures our employment areas and sites are protected, helping to create sustainable and competitive local economy, whilst also acknowledging that there may be needs not anticipated within the plan that come forward during the plan period.

- 4.51 Since the Draft Local Plan consultation, the main change to the policies is that they are now two policies rather than one. This gives a clearer distinction between the areas that are designated as BEAs and those that are not.
- 4.52 In addition, the approach to employment sites outside of BEAs has changed. On reflection, the size threshold included within the policy at Draft Local Plan stage seemed arbitrary as the size of the site does not reflect its importance or contribution to the local economy. Instead, Policy E4 now focusses on the sites suitability in land use terms, such as its neighbouring uses, and its marketability going forward.

#### **Integrated Assessment**

- 4.53 Policies E3 and E4 both scored several neutrals and some positives and significantly positive scores. Some effects were cross boundary, but the majority were local. There was one uncertain score in relation to IA23 for both policies as although they both primarily are employment policies; they do allow for non-employment generating uses providing that the relevant exceptions are met. This means that housing may be permitted on employment sites which could contribute to delivering a sustainable housing land supply'. However, this is uncertain as it depends on the applications that are submitted.
- 4.54 No mitigation or enhancements to either policy were required as a result of the IA.
- 4.55 In terms of the HRA the policies have both been screened out, there is no likely significant effect on any European Site anticipated from the operation of this Policy.

## Policy E5: Reuse and redevelopment of Mill Buildings

### Summary of evidence

- 4.56 Historic England have worked in close collaboration with the Council in preparing a [Mills Strategy](#)<sup>27</sup> 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.
- 4.57 Oldham has around 100 textile mills remaining. Many of the mills are in active use, offering low-cost premises to certain employment uses, residential use, retail or for social uses such as sports clubs. However, some mills have been derelict for many years or are underused with upper storeys not in use, which puts them at risk of falling into poor condition and may make conversion more difficult in the future. They are also often close to existing residential properties and may not always be in the best location for their current use.
- 4.58 The [Levelling Up Oldham](#)<sup>28</sup> paper built on the work done as part of the Mills Strategy stating that mill conversions have the potential to deliver significant returns for the borough in terms of employment, skills and jobs while also retaining a link to Oldham's heritage.

### Draft Local Plan consultation and Duty to Co-operate

- 4.59 At Draft Plan stage, the policy was referred to as 'Policy E3'.
- 4.60 At the Draft Plan consultation, the policy received some support - including from Historic England. There was a comment submitted on behalf of Sigma Property Co. asking for reference to the Mills Strategy to be deleted. This amendment has not been made, the Mills Strategy forms part of the evidence base for the Local Plan.
- 4.61 Finally, the Canals and Rivers Trust expressed some concerns in relation to the requirements for applicants to undertake viability exercises and suggested the Council include some explanatory text to include details of what would be expected within a viability exercise. Some additional text has been added to the reasoned justification regarding guidance in relation to viability. In addition, Policy IN2 'Planning Obligations' outlines that in some cases a site-specific viability assessment may be submitted where the need for such is evidenced by a change in circumstance which could not have been evident in the whole plan Viability Assessment, in line with NPPF and PPG. The reasoned justification of IN2 sets out further detail on viability assessments including that they should be proportionate, comply with national planning policy and guidance and should refer to the methodology and approach set out within the whole plan Viability Assessment.

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<sup>27</sup> This document can be found at:

[https://www.oldham.gov.uk/info/201236/evidence/2819/oldham\\_mills\\_strategy](https://www.oldham.gov.uk/info/201236/evidence/2819/oldham_mills_strategy)

<sup>28</sup> This document can be found at:

[https://www.oldham.gov.uk/downloads/file/8253/leveling\\_up\\_oldham\\_full\\_report](https://www.oldham.gov.uk/downloads/file/8253/leveling_up_oldham_full_report)

- 4.62 A detailed summary of the responses received can be found in the 'Schedule of Comments and the Council's Response' document.
- 4.63 Oldham Council met with Historic England on 1 July 2025 to discuss the comments they submitted at Draft Local Plan stage; this included their support for this policy which was reiterated.

### Policy Approach

- 4.64 Many of our mills are in active use and offer a low-cost premises to certain employment uses, residential use, retail or for social uses such as sports clubs. However, some of our mills have been derelict for many years or are underused with upper storeys not in use, which puts them at risk of falling into poor condition and may make conversion more difficult in the future. They are also often close to existing residential properties and may not always be in the best location for their current use. Building on work done as part of [Oldham's Mill Strategy](#)<sup>29</sup>, the '[Levelling Up Oldham](#)<sup>30</sup>' paper stated that Mill conversion has the potential to deliver significant returns for the borough in terms of employment, skills and jobs while also retaining a link to Oldham's heritage.
- 4.65 Policy E5, Reuse and redevelopment of Mill Buildings, 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.
- 4.66 The Reasoned Justification explains that 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.

### Integrated Assessment

- 4.67 Policy E5 scored mostly neutrals and some positives and significantly positive scores in the Integrated Assessment. All effects were local. No mitigation or enhancements to the policy was required because of the IA.
- 4.68 In terms of the HRA the policy has been screened out, there is no likely significant effect on any European Site anticipated from the operation of this Policy.

### Monitoring

- 4.69 Policies E1 to E5 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1. The Local Plan indicators that will be used to monitor these policies are:

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<sup>29</sup> This document can be found at: [https://www.oldham.gov.uk/info/201236/evidence/2819/oldham\\_mills\\_strategy](https://www.oldham.gov.uk/info/201236/evidence/2819/oldham_mills_strategy)

<sup>30</sup> This document can be found at: [https://oerb.org.uk/wp-content/uploads/2022/03/ING6167\\_UoM\\_Levelling-up-Oldham-22-03-22.pdf](https://oerb.org.uk/wp-content/uploads/2022/03/ING6167_UoM_Levelling-up-Oldham-22-03-22.pdf)

- Total amount of additional floorspace (office, industry and warehousing) by type square metres (sqm) gross
- Total amount of employment floorspace (office, industry and warehousing) developed on previously developed land by type (sqm gross)
- Employment land available by type (ha)
- Total amount of employment land (office, industry and warehousing) developed by type hectares (ha) gross
- The percentage of areas in Oldham among the 10% most deprived areas in England
- Unemployment rate
- Youth unemployment rate
- Number and type of developments permitted on non-designated Mills

4.70 Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:

- Further guidance on the relevant policy matter may be produced.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.71 As these policies have been informed by PfE policies JP-J1 – JP-J4, the PfE monitoring framework will also help to monitor this chapter. The following PfE monitoring indicator will help to monitor these policies<sup>31</sup>:

- Percentage of gross employment development on brownfield land
- Percentage increase in GVA per job
- Proportion of our residents (working age) in employment
- Number of local labour agreements
- Increase in office floorspace (gross)
- Increase in industry and warehousing floorspace (gross)

4.66 The monitoring framework is therefore considered to be appropriate to ensure the deliverability of policies E1 to E5.

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<sup>31</sup> As PfE is a Joint Plan of Bury, Bolton, Oldham, Manchester, Rochdale, Salford, Tameside, Trafford and Wigan, the PfE indicators apply plan-wide (including all districts).

## 5. Conclusion

### Providing an appropriate strategy

5.1 Policies E1 to E5 of the Oldham Local Plan: Publication Plan provide the policy framework for building a strong and competitive economy.

5.2 In terms of the test of soundness listed at paragraph 36 of NPPF it is considered that these have been met as follows:

- a) **Positively prepared:** the Oldham Local Plan: Publication Plan supports delivery of PfE which provides the strategic direction and context for PfE plan area's economy. The Local Plan sets out, in line with PfE Policy JP-J3 and JP-J4, the amount of office, industry and warehousing floorspace that will be provided over the plan period. In addition, the Local Plan sets out several designated employment areas that will support economic growth and productivity, as well as including policies that are flexible enough to accommodate needs that may not have been anticipated. These centre policies have been positively prepared as they are aligned with national planning policy and are based on a clear understanding of local needs. They have been shaped through engagement with stakeholders, businesses and residents and provide a positive and appropriate strategy for our economy.
- b) **Justified:** the Oldham Local Plan: Publication Plan supports delivery of PfE which provides the strategic direction and context for PfE plan area's economy. These economic policies are justified as they set out how we will contribute to the PfE employment requirement, the BEA boundaries have been reviewed and amended based on engagement with stakeholders and the latest development that has taken place in the borough and the policies support a sustainable pattern of development by protecting established employment areas, making an efficient use of previously developed land.
- c) **Effective:** the Oldham Local Plan: Publication Plan supports delivery of PfE which provides the strategic direction and context for PfE plan area's economy. The plan period of up to 2039 reflects that of PfE and continued effective joint working arrangements with PfE districts on cross-boundary strategic matters, will support delivery of the joint and local plans. Deliverability of the Oldham Local Plan: Publication Plan is also evidenced by the Infrastructure Delivery Plan and Statement of Common Ground.

Policies E1 to E5 are also effective because they provide a clear and deliverable framework for implementation. The amount of office and industrial and warehousing floorspace completed will be monitored annually to ensure that the existing supply is sufficient to meet quantitative and qualitative needs of Oldham and our local businesses, and to ensure that PfE's overall strategy is being adhered to. Should monitoring indicate that the employment requirement (at a district or strategic level) needs to be reviewed, an update will be carried out as necessary. In addition, the policies in relation to our employment areas, including our mills, are flexible enough to accommodate needs that may not have been anticipated.

d) **Consistent with national policy:** policies E1 to E5 support delivery of sustainable development in accordance with relevant national policy, in particular the policies aim to create the conditions in which businesses can invest, expand and adapt within Oldham. The vision is aligned with that of PfE, in that we want to ensure our employment areas are attractive to key the economic sectors identified within PfE as well as supporting Oldham Council's ambitions regarding the building of the Green Technologies and Services sector (GTS). In addition, the policies in relation to our employment areas, including our mills, are flexible enough to accommodate needs that may not have been anticipated.

5.3 Furthermore, policies E1 to E5 are considered an appropriate strategy for Oldham as they contribute towards delivering the Local Plan's vision and plan objectives, and the Oldham Plan missions. Oldham will be a key contributor to Greater Manchester's economy, with a strong reputation for clean growth and green innovation. The borough will have job opportunities, where those businesses local to Oldham are supported to thrive and grow, and those new to Oldham are attracted to invest.

5.4 The policies will also support Plan Objective 3 of 'boosting northern competitiveness by providing access to employment opportunities and growing local businesses'.

5.5 The policies E1 to E5 will also support The Oldham Plan's mission of 'Green and Growing' which is about making Oldham a place where economic growth benefits all residents, creating opportunities for businesses to succeed while ensuring our community and environment thrive.

## **Appendix 1 – Employment Land Supply Evidence**

Contained in a separate document.