

Oldham

Local Plan

**Publication Plan: Infrastructure and Delivery
Topic Paper**

January 2026



Oldham
Council

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1. Introduction and Purpose

- 1.1. This is the Infrastructure and Delivery Topic Paper and is one of 13 topic papers produced to inform the consultation on the Oldham Local Plan: Publication Plan. It looks specifically at:
 - Digital infrastructure and telecommunications
 - Planning obligations
 - Delivering social value and inclusion
 - Monitoring of the Oldham Local Plan policies
- 1.2. All Topic Papers can be found online at [Oldham Council's website](#).
- 1.3. The main purpose of the Topic Paper is to set out:
 - the current key policies, plans and strategies relating to infrastructure and delivery that have informed the Local Plan;
 - the main issues, challenges and opportunities relating to infrastructure and delivery 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 above and:
 - 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.

2. Relevant Policies, Plans and Strategies

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

National Context

National Planning Policy Framework

- 2.2. [National Planning Policy Framework](#)¹ (NPPF) sets out several policies relating to infrastructure and delivery as set out below.
- 2.3. Paragraph 7 sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.
- 2.4. Paragraph 8 sets out the three overarching objectives for achieving sustainable development. These include:
- An economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - A social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - An environmental objective - to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2.5. The presumption in favour of sustainable development at paragraph 11 sets out that in relation to plan-making this means all plans should promote a sustainable pattern of development that: meets the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.
- 2.6. Paragraph 20 references infrastructure numerous times, highlighting its importance stating that strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make provision for:
- a) homes (including affordable housing), employment, retail, leisure and other commercial development;
 - b) infrastructure for transport, telecommunications, security, waste management,

¹ National Planning Policy Framework (December 2024, as amended February 2025) available at: https://assets.publishing.service.gov.uk/media/67aafef3b41f783cca46251/NPPF_December_2024.pdf

water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- c) community facilities (such as health, education and cultural infrastructure); and
 - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 2.7. The need for strategic policies to look ahead over a minimum of 15 years from adoption also enables plans to anticipate and respond to long-term requirements and opportunities in relation to infrastructure. Whilst the section in NPPF on maintaining effective cooperation (paragraphs 24 to 28) highlights the importance of collaboration between strategic policy-making authorities and infrastructure providers.
- 2.8. Paragraph 29 states that non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.
- 2.9. Paragraph 35 sets out that plans should identify contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.
- 2.10. Paragraphs 56-59 relate planning conditions and obligations. They set out that local planning authorities should consider whether otherwise unacceptable development could be made acceptable using conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 2.11. Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case. This includes whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning practice guidance, including standardised inputs, and should be made publicly available.
- 2.12. There are many instances in which NPPF refers to types of infrastructure that may be delivered to support new development, including via planning obligations. These include:
- Paragraph 96 sets out that planning policies should address local health and well-being needs for example through the provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
 - Paragraph 100 sets out that a sufficient choice of school places should be available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in

education.

- Paragraphs 103 to 104 set out that plans should ensure that open space, sport and recreation needs are accommodated.
- Paragraphs 109 to 114 set out the requirements in terms of providing supporting transport infrastructure as part of development.

2.13. In addition to the above, other sections of NPPF relevant to infrastructure and delivery include:

- Chapter 10 sets out that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

National Planning Policy Guidance

Planning Obligations (2016, updated 2019)²

- 2.14. [Planning Obligations](#) guidance sets out that planning obligations (also commonly referred to as 'section 106 contributions' and 'developer contributions') are a legal obligation entered into, usually by a person with an interest in the land and the local planning authority or via a unilateral undertaking, to mitigate the impacts of otherwise unacceptable development to make it acceptable in planning terms.
- 2.15. As per Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 the guidance states that planning obligations must be:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
- 2.16. The guidance goes on to note that policies for planning obligations should be set out in plans and examined in public. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. Such policies should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability. Plans should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability considering all relevant policies.
- 2.17. In terms of viability, the guidance notes that where planning obligations are negotiated on the grounds of viability it is up to the applicant to demonstrate whether circumstances justify the need for viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker.
- 2.18. The guidance lists several definitions of infrastructure, in the context of planning obligations, including affordable housing, education, health, highways, transport

² Available at: <https://www.gov.uk/guidance/planning-obligations>

and travel, open space and leisure, community facilities, digital infrastructure, green infrastructure, flood and water management, economic development and land.

- 2.19. Developer contributions should be monitored and reported upon within an annual Infrastructure Funding Statement.
- 2.20. It also sets out specific guidance for gathering developer contributions towards educational places, including that plans should set out the contributions expected from development. This should include contributions needed for education, based on known pupil yields from all homes where children live, along with other types of infrastructure including affordable housing.

Healthy and safe communities (2014, updated 2022)³

- 2.21. [Healthy and safe communities](#) guidance sets out that planning and health need to be considered together in two ways:
 - 1) in terms of creating environments that support and encourage healthy lifestyles; and
 - 2) in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).
- 2.22. For health provision, it sets out that engagement between plan-making bodies and relevant organisations will help ensure that local strategies to improve health and wellbeing and the provision of the required health infrastructure are supported and considered in plans.
- 2.23. In terms of education, it sets out that plans should seek to meet the development needs of their area, including community facilities such as schools. They should, at the most appropriate level, allocate sufficient suitable land for schools to meet the need anticipated over the plan period, taking into account needs that may cross local authority boundaries. Plan-makers will need to work with local authorities with education responsibilities and developers to coordinate the phasing and delivery of housing growth with the delivery of new school places to ensure that sufficient school capacity is available at the right time.
- 2.24. Other planning guidance is available which deals with open space, sport and recreation, green infrastructure and affordable housing.

Plan-making (2018, updated 2025)⁴

- 2.25. [Plan-making](#) guidance is related to plan making and has several sections relevant to infrastructure and delivery. It sets out ways in which effective cooperation can help address strategic infrastructure needs, advises that policy-making authorities need to work alongside infrastructure providers and states a collaborative approach is expected to be taken to identifying infrastructure deficits and requirements, and opportunities for addressing them.
- 2.26. It goes on to say that policy requirements for developer contributions should be informed by proportionate evidence of infrastructure and affordable housing need

³ Available at: <https://www.gov.uk/guidance/health-and-wellbeing>

⁴ Available at: <https://www.gov.uk/guidance/plan-making>

and be assessed for viability at the plan-making stage in accordance with guidance. On this matter it also says that authorities will also need to ensure that policies setting out contributions expected from development do not undermine delivery of the plan.

- 2.27. The guidance also explains the role of the Authorities Monitoring Report (AMR) and that they can be used as evidence to underpin planning policies along with other sources such as planning application and appeal decisions.

National Infrastructure: A 10-year Strategy

- 2.28. In June 2025 the government published a policy paper titled '[National Infrastructure: A 10-year Strategy](#)'⁵. The Strategy sets out the government's long-term plan for economic, housing and social infrastructure to drive growth.
- 2.29. Recognising past mistakes, the Strategy prioritises long-term outcomes over short-term announcements, to provide the certainty and stability needed to attract investment, boosting British supply chains and jobs, and taking a joined-up view to improve planning and delivery across all types of infrastructure.
- 2.30. The Strategy is backed by at least £725 billion of government funding for infrastructure over the next decade. It is comprehensive – covering both economic and social infrastructure for the first time, recognising that schools and hospitals are just as vital to living standards as road and rail. And it is ambitious – with the upcoming online Infrastructure Pipeline, setting out the full range of projects to be taken forward. This will support the government's modern Industrial Strategy, delivering the long-term certainty businesses need, and unlocking the potential of the highest-growth sectors and the places where they are concentrated.

Greater Manchester Context

Greater Manchester Strategy (2025-2035)

- 2.31. The vision for the [Greater Manchester Strategy](#)⁶ is to create a thriving city region where everyone can live a good life, with a focus on: healthy homes for all; safe and strong communities; a transport system for a global city region; a clear line of sight to high quality jobs; everyday support in every neighbourhood; a great place to do business and digitally connected places and people.
- 2.32. Specifically, related to infrastructure and delivery, the Strategy sets out that Greater Manchester will have an integrated transport system for a global city region, a live-well network of community-led support and a focus on sustainable and affordable housing.

⁵ Available at: <https://www.gov.uk/government/publications/uk-infrastructure-a-10-year-strategy>

⁶ Available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/greater-manchester-strategy/>

The Greater Manchester Infrastructure Framework 2040

- 2.33. Strategic infrastructure needs are considered at the Greater Manchester level.
- 2.34. The Greater Manchester Combined Authority (GMCA) has worked with infrastructure providers to produce the [Greater Manchester Infrastructure Framework 2040](#)⁷ (GMIF). This Framework considers various elements of physical infrastructure – energy; transport; digital; flooding, surface and wastewater management; green and blue infrastructure; and potable (drinking) water. It sets out what the key issues and opportunities are that need to be addressed through a wider Infrastructure Strategy. More information on the GMIF can be found in the Infrastructure Delivery Plan.

Places for Everyone (PfE)

- 2.35. The [Places for Everyone](#) (PfE) Joint Development Plan Document (DPD)⁸, 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.
- 2.36. There are many policies within PfE which relate to infrastructure and delivery including those within the housing chapter (JP-H2 and JP-H3); the sustainable and resilient places chapter (JP-S1 to JP-S6); the places for people chapter (JP-P1 to JP-P7); the connected places chapter (JP-C1 to JP-C8); Chapter 11 – Oldham Strategic Allocations (allocation policies for housing and employment development containing infrastructure requirements); JP-D1 (Infrastructure Implementation) and JP-D2 (Developer Contributions).
- 2.37. In particular JP-D1: Infrastructure Implementation sets out how PfE will ensure the effective development and implementation of the infrastructure needed to deliver the Plan's vision and objectives. This includes: taking a long term, strategic, holistic and integrated approach to place shaping, supported by devolved resources and powers; promoting collaboration with infrastructure providers and synchronisation of investment plans; and where potential capacity problems are identified as part of new development and no improvements are programmed by the relevant infrastructure provider, requiring the developer to contribute to and/or facilitate necessary improvements where this would be necessary to mitigate the impact of development.
- 2.38. JP-D2: Developer Contributions sets out that we will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms.
- 2.39. JP-C2 'Digital Connectivity' sets out that we will support the provision of affordable, high quality, digital infrastructure and goes on to list a range of measures that will be supported in making decisions.

⁷ Available at: <https://www.greatermanchester-ca.gov.uk/media/1715/greater-manchester-infrastructure-framework-2040.pdf>

⁸ Available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/>

- 2.40. The Monitoring section of PfE sets out that to be effective plans need to be kept up-to-date and monitored. We need to regularly monitor performance to assess whether we are achieving our strategic objectives and whether our policies remain relevant, or whether they need to be updated. As such it sets out a monitoring framework, including several indicators to monitor the policies within the Plan.

Local Context

- 2.41. A summary of the Oldham Partnership's [Oldham Plan](#)⁹ and the Council's [Corporate Plan](#)¹⁰ and how the Local Plan will help to deliver their missions and priorities is provided in the 'Setting the Scene' Topic Paper.
- 2.42. Of particular relevance to Infrastructure and Delivery is the commitment in the Corporate Plan to strengthening infrastructure through its 'capacity building' pillar, ensuring that the Council builds the facilities and systems needed to meet current and future demands; and it's 'digital' pillar through using digital tools to improve services and make our organisation more efficient. It further prioritises highway asset management, adopting long-term, regionally coordinated strategies for maintenance and resilience—connecting the plan to ongoing town-centre regeneration projects such as new public spaces, housing, and the transformation of Spindles Shopping Centre.

Building a Better Oldham

- 2.43. [Building a Better Oldham](#)¹¹ is the Council's ambitious transformation programme for the Borough. As with the Partnership's missions, the Local Plan support's delivery of this ambitious programme.
- 2.44. Related to infrastructure, the programme includes aims and opportunities around building quality homes, providing opportunities to learn and gain new skills, ensuring Oldham is the greenest Borough, embedding sustainability, energy efficiency and low (zero) carbon, and improving health and wellbeing of local communities.

Other Local Context

- 2.45. Other relevant local context including that related to biodiversity, green infrastructure, open space, sport and recreation, housing, economy, retail, transport and energy is set out within the relevant topic papers for each theme.

⁹ The Oldham Plan 2024-2030 is available at:

https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan

¹⁰ The Council's Corporate Plan 2024-2027 is available at:

https://www.oldham.gov.uk/info/200146/strategies_plans_and_policies/2888/corporate_plan

¹¹ Building a Better Oldham is available at:

https://www.oldham.gov.uk/info/201248/building_a_better_oldham#:~:text=Building%20a%20Better%20Oldham%20is,jobs%20and%20100%20apprenticeship%20opportunities.

3. Issues, challenges and opportunities relating to Infrastructure and Delivery

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

Digital Infrastructure and Telecommunication

- 3.2. NPPF states that advanced high quality and reliable communications infrastructure is essential for economic growth and social well-being and that planning policies should support the expansion of electronic communications networks, including next generation mobile technology (such as set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments 5G) and full fibre broadband connections.
- 3.3. The Greater Manchester Combined Authority (GMCA) has worked with infrastructure providers to produce the [Greater Manchester Infrastructure Framework 2040](#)¹² (GMIF). This Framework considers strategic infrastructure needs at the Greater Manchester level and looks various elements of physical infrastructure, including digital connectivity.
- 3.4. The Framework identifies 11 key infrastructure challenges, including implementation of the [GM Digital Strategy](#)¹³ to provide pervasive, affordable, resilient digital connectivity. With the ambition that approaching 2040, GM will need to be a smart and digitally ready City Region, and to achieve this, and support on-going digitalisation, the region will require resilient fixed connectivity (through full fibre) supported by 5G (and subsequent technologies).
- 3.5. Demand for access to digital services and the pressures this is placing on our digital connectivity infrastructure is growing exponentially. Oldham Council is implementing a digital strategy, so that where possible and there is resident demand, end-to-end digital services are available. Much of that strategy focuses on what the Council can do to improve its digital presence. Digital Connectivity infrastructure (full fibre and gigabit broadband and mobile) is provided on competitive basis by the private sector.

Issues to be addressed

- 3.6. There is a need to ensure that connectivity in Oldham supports existing and future demand; to not only support good Internet and mobile phone access for residents and businesses, but also to provide a platform for “smart” technologies, including

¹² The Greater Manchester Infrastructure Framework 2040 can be found at <https://www.greatermanchester-ca.gov.uk/media/1715/greater-manchester-infrastructure-framework-2040.pdf>

¹³ The Greater Manchester Digital Strategy can be found at <https://www.greatermanchester-ca.gov.uk/what-we-do/digital/digital-strategy/>

environmental monitoring and management, energy efficiency and future transport solutions.

Planning Obligations

- 3.7. A 'planning obligation' is a legal agreement entered into under [section 106 of the Town and Country Planning Act 1990](#)¹⁴ to mitigate the impacts of a development proposal. Planning obligations are often also referred to as 'developer contributions'.
- 3.8. Under section 106 (s106) of the Town and Country Planning Act 1990 a local planning authority (LPA) can seek planning obligations when it is considered that a development will have negative impacts that cannot be dealt with through conditions, placing additional pressure on existing social, physical and economic infrastructure in the surrounding area. Planning obligations aim to balance this extra pressure with improvements to the surrounding area to ensure that a development makes a positive contribution to the local area.
- 3.9. The obligations may be provided by the developers "in kind" – that is, where the developer builds, or provides directly, the matters necessary to fulfil the obligation. This might be to build a certain number of affordable homes on-site, for example.
- 3.10. Alternatively, planning obligations can be met in the form of financial payments to the Council to provide off-site infrastructure works or contributions towards providing affordable housing elsewhere in the borough. In some cases, it can be a combination of both on-site provision and off-site financial contributions.
- 3.11. Planning obligations can be used to support a variety of necessary infrastructure including:
- Affordable housing
 - Open space, sport and recreation
 - Trees
 - Biodiversity/ ecology
 - Social value/ employment
 - Highways/ transport
 - Educational (school) places
 - Health facilities
- 3.12. The Council cannot ask for contributions via section 106 planning obligations in certain circumstances. With regards to affordable housing, national planning policy stipulates that planning obligations for affordable housing should only be sought for residential developments that are major developments. For residential development, major development is defined in NPPF Annex 2 'Glossary' as development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.

¹⁴ Available at: <https://www.legislation.gov.uk/ukpga/1990/8/section/106>

- 3.13. Planning obligations should also not be sought from any development consisting only of the construction of a residential annex or extension to an existing home¹⁵.
- 3.14. Often used alongside s106 planning obligations, a Section 278 agreement is used where obligations required as part of new development involve physical works to the existing public highway.
- 3.15. Oldham's [Infrastructure Funding Statement](#) (IFS)¹⁶ sets out the existing process for seeking planning obligations; provides a summary of the financial contributions that the Council has secured through s106 agreements from new developments for off-site infrastructure works and affordable housing; and sets out highway works secured as part of new developments through section 278 (s278) agreements.
- 3.16. Specifically, the IFS sets out how much s106 financial contributions have been agreed, received, spent and allocated (but not spent) during the financial year.
- 3.17. The report does not include information on the infrastructure delivered on-site as part of new developments in the Borough.
- 3.18. The IFS sets out that where it is determined that on-site infrastructure and/or affordable housing required by a particular policy is not appropriate, the Council will request from developers a financial contribution to meet these needs outside of the development site through a s106 obligation. The financial contribution required at present, is in line with existing policies within the existing Local Plan (the Joint Core Strategy and Development Management DPD, 2011). In addition, Biodiversity Net Gain (BNG) became mandatory from 12 February 2024 for major developments and 2 April 2024 for minor developments¹⁷. This requires developments, unless exempt, to meet a minimum of 10% BNG. Where this cannot be achieved in full on-site the developer is required to find off-site solutions to achieve the target. This presents opportunities across the Borough to enhance biodiversity.
- 3.19. Contributions toward required highway works resulting from new development is agreed on a case-by-case basis, evidenced by an assessment of the impact the development will have on the local highways and mitigation works required to minimise this impact.
- 3.20. Once the s106 has been signed, it is an obligation, but it will only be realised if the planning permission is implemented and reaches the trigger point for payment, such as 'commencement of development' or 'prior to the occupation of' a set number of homes. When the planning permission is granted, the s106 obligation is registered as a land charge which stays with the land, obligating any future owners until the terms are met.

¹⁵ As set out in Planning Practice Guidance 2019 Paragraph 023:

<https://www.gov.uk/guidance/planningobligations>

¹⁶ The most recently available IFS is 2023/24:

https://www.oldham.gov.uk/info/201230/monitoring/3154/infrastructure_funding_statement. An update for 2024/25 will be published in early 2026.

¹⁷ BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990.

- 3.21. Further evidence on the contributions gathered through s106 planning obligations in Oldham is set out in the IFS - previous IFS reports are also available online¹⁸.

Viability

- 3.22. The Local Plan Viability Assessment (2025) has tested the viability of the Local Plan policies. The general principle for the assessment is that planning obligations including affordable housing will be levied on the increase in land value resulting from the grant of planning permission. However, as there are fundamental differences between the land economics of brownfield and greenfield sites, several types of development across different types of land (typologies) have been tested.
- 3.23. In brief, the typologies/ scenarios tested were:
- Brownfield land / Greenfield land / Green Belt land¹⁹
 - Value zones (lower, medium, higher)
 - Development scale (9–600 residential units)
 - Housing type (houses, high density (houses and apartments))
 - Commercial development (industrial, office, retail warehouse, mixed retail).
- 3.24. The inputs used to test the typologies were evidence based using sales values, market rents, yields, and Benchmark Land Value's (BLV) drawn from:
- Land Registry
 - Oldham's Local Housing Needs Assessment (2024)
 - Oldham's Strategic Housing Land Availability Assessment (2024)
 - Local market analysis
 - BCIS²⁰ 5-year cost data
 - Stakeholder consultation (Oct 2025)
- 3.25. Housing market value zones were identified based on new-build and second-hand data and IMD²¹ (deprivation) mapping. These are shown in Figure 1 below.
- 3.26. Four of the borough's wards are identified as high value areas (Saddleworth North, Saddleworth South, Chadderton North and Shaw); nine are identified as medium value areas (Crompton, Royton North, Royton South, Chadderton Central, Chadderton South, Failsworth East, Failsworth West, Medlock Vale and

¹⁸ Oldham's Infrastructure Funding Statement:

https://www.oldham.gov.uk/info/201230/monitoring/3154/infrastructure_funding_statement

¹⁹ The Local Plan does not include any site allocations, nor does it allocate Green Belt land for release. However, the assessment has considered the viability of Green Belt land for completeness and to assist in viability considerations for any planning applications that may come forward for Green Belt land in line with the amended NPPF. Any applications for Green Belt land will be assessed in line with National Planning Policy ('Golden Rules'), national planning guidance and, where appropriate, available local evidence. Relevant local plan policies will also apply.

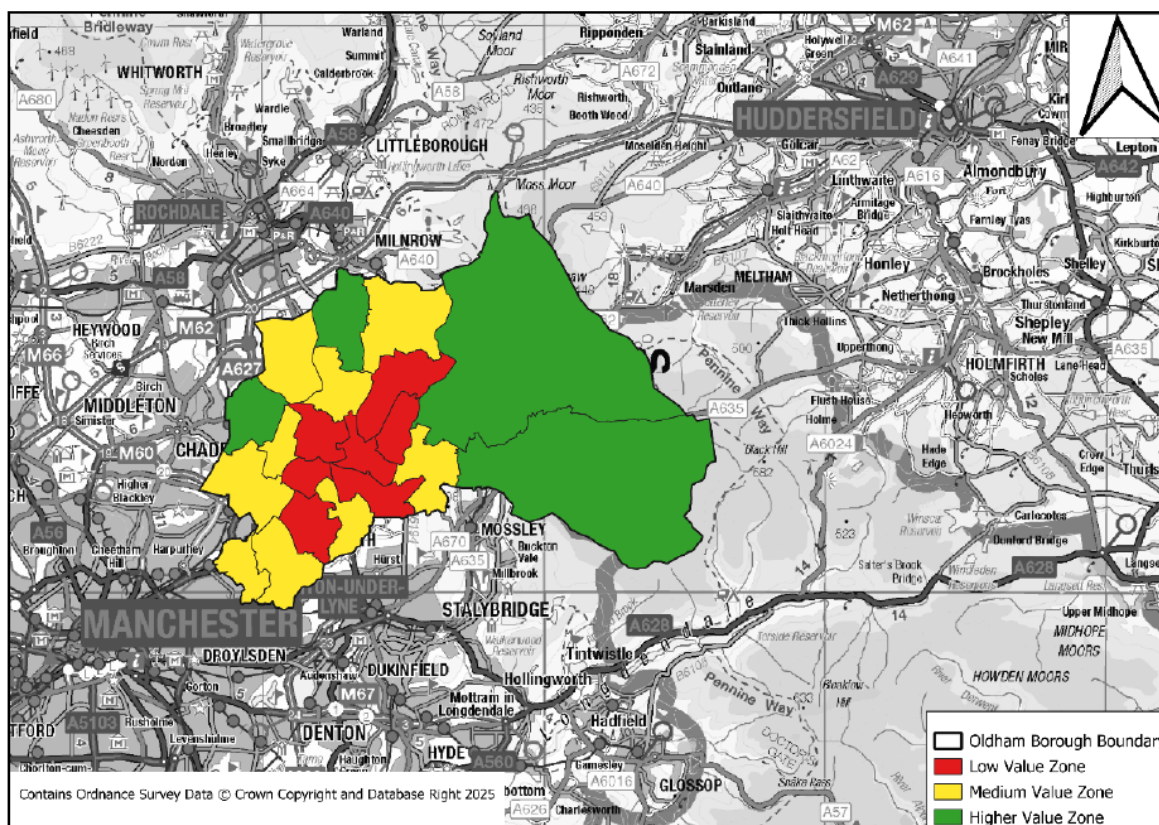
²⁰ Building Cost Information Service (BCIS), part of the Royal Institution of Chartered Surveyors (RICS).

²¹ Indices of Multiple Deprivation (IMD).

Saddleworth West and Lees); and seven are identified as low value areas (St James', Waterhead, St Mary's, Coldhurst, Alexandra, Werneth and Hollinwood).

- 3.27. It should be noted that the identification of the value areas is not perfect - there may be particularly high value schemes in a lower value area and vice-versa depending on individual circumstances. However, it is evidenced based and logical for ease of implementation, to inform policy appropriately.

Figure 1: Oldham Housing Market Value Areas²²



- 3.28. The assessment assumed various cost assumptions including, commercial and retail costs, build/ construction costs and section 106 policy costs²³, based on available evidence, national planning policy requirements, existing planning policy (PfE) requirements and the proposed planning policy requirements in the Local Plan. Appendix 1 of the Viability Assessment sets out the costs of the Oldham Local Plan policies and describes how they have been incorporated into the viability assessment.
- 3.29. In terms of residential development s106 policy costs were assumed as £5,500 per unit (dwelling). This is in line with the [Greater Manchester Spatial Framework](#).

²² Source: Aspinall Verdi/ QGIS (adapted from figure 5.4, Oldham Viability Assessment 2025).

²³ These are set out in the Viability Assessment - section 5 for commercial development and section 6 for residential development.

[Strategic Viability Report Stage 1](#)²⁴ (September 2020) which assumed a £5,250 per unit S106 cost. An uplift has been added to account for the timeframe of the plan period. These costs include:

- Combined Sport/Play/Open Space
- Education
- Transport
- Legal/Monitoring

3.30. The S106 costs cover the policies identified in Appendix 1 of the Viability Assessment with direct viability implications including:

- Enhancing Green Infrastructure (Policy N3)
- Trees (Policy N4)
- Electric Vehicle Charging Infrastructure (Policy T4)

3.31. In terms of commercial development, the assessment notes that there are no major specific Local Plan policies relating to commercial and retail development, however there are policies relating to general development which will have an impact on viability. The assessment notes that it is difficult to quantify these costs and beyond the scope of the report to provide detailed commentary but the following policies (the list is not exhaustive) may be applicable to commercial development:

- Policy CC2 – Renewable and Low Carbon Energy
- Policy CC5 – Water Efficiency
- Policy CC6 – Groundwater Source Protection Zones
- Policy N4 - Trees

3.32. Appendix 7 of the Viability Assessment sets out the exact costings assumed for the commercial typologies assessment²⁵.

3.33. Sensitivity analysis was used in testing the typologies which provided varied analysis based on affordable housing %, S106 developer contribution/ obligation levels, build costs, market values, profit, BLV, net zero costs, density changes and grant funding. The results of the sensitivity analysis are also set out in Appendix 7 of the Viability Assessment.

3.34. It should be noted that the Viability Assessment uses costs which are considered to be 'worst-case' scenario²⁶. As such, there is scope for some flexibility and pragmatism to policies in the Plan. For example, the worst-case scenario appraisals assume generous allowances for profit and land value, do not take into account the growth in values created by local energy homes and new markets as a result of

²⁴ The Greater Manchester Spatial Framework Strategic Viability Report Stage 1 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=03%20Plan%20wide#fList>

²⁵ See Appendix 7 of the Viability Assessment, pages 693-696.

²⁶ See section 6 of the Viability Assessment (2025) for further information on the cost assumptions used.

wider regeneration. Nor do they take into account emerging construction cost savings as new low carbon/ energy building technologies become embedded in the construction sector.

3.35. The Viability Assessment provides a full explanation of the methodology used.

3.36. A summary of the results of the Viability Assessment are set out below.

Commercial Development

3.37. The assessment noted that commercial development can be extremely varied and viability is often dependent on a range of unforeseeable consideration unique to each development. Securing of pre-lets to tenants with strong covenants on longer term leases for example can significantly improve the viability of development. Commercial property therefore often requires more granular examination based on individual applications. Therefore, the assessment has undertaken base analysis for several commercial uses but acknowledges their limitations. The results for each use is briefly summarised below:

- Industrial – Viability is likely to be challenging depending on the type of development delivered.
- Office - Viability is likely to be particularly challenging for office developments with development unlikely to be able to bear additional policy costs
- Retail Warehousing – High-level testing suggests some level of viability for retail warehousing; however sensitivity analysis demonstrates that minor changes push this to marginal viability. Additional costs would therefore need to be carefully considered.
- Retail, General – Testing shows potential for viable development, however once land costs are accounted for this is likely to be marginal and therefore additional costs are unlikely to be able to be accommodated.

Residential Development

3.38. For brownfield sites, the testing found that:

- All schemes in the lower value zones are unviable when tested against the assumed costs. Grant funding would be required to support the schemes and improve viability.
- In the medium value zones all schemes, except the 100-unit scheme, are marginally viable, however some schemes would require a modest increase in market values or a decrease in build costs, and some grant funding.
- In the high value zones all schemes, except the 100-unit scheme, are viable, and could support significantly higher assumed section 106 policy costs (up to £14,000 per unit) than the average assumption (£5,500 per unit) applied in the general testing. On the 100-unit scheme, to achieve 15% affordable housing a grant of £55,000 per unit would be required to make the scheme viable.

3.39. For greenfield sites, the testing found that:

- All schemes in the lower value zones are unviable when tested against the assumed costs. Grant funding would be required to support the schemes and improve viability.

- In the medium value zones all schemes, except the 100-unit scheme, are marginally viable, however some schemes would require a modest increase in market values or a decrease in build costs, and some grant funding.
 - In the high value zones all schemes, except the 100-unit scheme, are viable, and could support significantly higher assumed section 106 policy costs (up to £14,000 per unit) than the average assumption (£5,500 per unit) applied in the general testing. On the 100-unit scheme, to achieve 20% affordable housing a grant of £45,000 per unit would be required to make the scheme viable.
- 3.40. For Green Belt sites (assuming 50% of the site is for affordable housing, except for minor sites), the testing found that:
- All schemes within the lower value areas are unviable. Most schemes required grant funding (of between £50,000 and £55,000 per unit) and a reduction of affordable housing to between 20%, 30% or 35%. No sensitivity scenario would make the 100-unit scheme viable.
 - Within the medium value zones, 9-unit schemes were found to be marginally viable (as they didn't require affordable housing), however all other schemes were unviable. Most schemes required grant funding (of between £20,000 and £25,000 per unit), a modest reduction in build costs and/or an increase in market values, and a reduction of affordable housing to around 20%. No sensitivity scenario would make the 100-unit scheme viable.
 - Within the high value zones, all schemes are viable, except the 100-unit scheme (which required grant funding of £55,000 per unit to be viable).
- 3.41. The difficult viability for the 100-unit scheme typology is largely due to the type of development that was tested for this scenario. The 100-unit typology assumed a mix of houses and flats, compared to solely houses which were tested in the other scenarios, to provide an alternative type of development analysis. Compared to other types of development, there are abnormal build costs associated with flats which have contributed to increased costs overall and therefore difficult viability outcomes.
- 3.42. For residential development, the overall recommendations of the Viability Assessment were that a balance is required between deciding on a broadly achievable affordable housing requirement whilst also not discouraging development. It recognised that NPPF does not specify a minimum affordable housing target anymore, making it difficult to recommend appropriate requirements. Ultimately, the assessment highlights that the lack of viability in some parts of the Borough is largely due to the high build costs and lower sales values across Oldham. It notes that across the plan-period both land values and build costs are likely to experience changes, which may lead to a shift in the viability position across the area. Other proactive interventions in the market to deliver housing should be considered (including partnering with Registered Providers, use of grant funding and other regeneration funding streams).
- 3.43. Policy considerations related to the assessment findings for residential development are set out in the Housing Topic Paper (sections 3 and 4).

Conclusions

- 3.44. In summary, the Viability Assessment provides a high-level assessment of the viability implications of the policies within the Oldham Local Plan: Publication Plan. It is intended to inform policy preparation and provide a robust evidence base to support the Plan.
- 3.45. Despite the use of evidence-based cost assumptions in the assessment, in reality schemes will have different build costs, policy costs and land values. Therefore, the assessment provides an indication for planning policy preparation purposes but is not absolute. It is also important to reiterate that the Viability Assessment uses costs considered are the 'worst-case scenario'.
- 3.46. It is recognised, however, that viability is difficult in many parts of the Borough. As such there is scope for some flexibility and pragmatism for policies in the Plan.
- 3.47. The assessment recommends that Oldham Council continues to work with all agencies (national and regional) to tackle market failure in the regeneration areas.
- 3.48. In addition, in accordance with best practice, plan wide viability should be reviewed on a regular basis to ensure that the Plan remains relevant as the property market cycle(s) change. It recommends that the Plan is reviewed simultaneously and that steps are made towards aligning the Oldham Local Plan. Furthermore, to facilitate the process of review, it recommends that Oldham Council monitor the development appraisal parameters in the assessment, but particularly data on land values, delivery rates and grant funding within the Borough.

Social Value and Inclusion

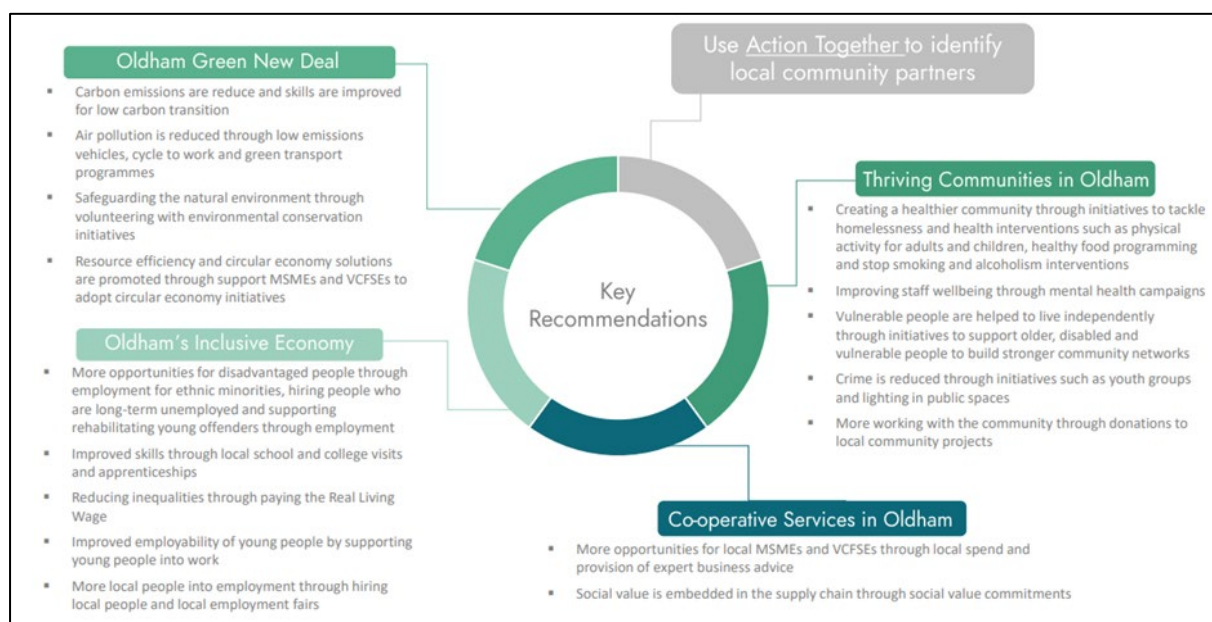
- 3.49. 'Social value' is defined in Public Services Act 2012 as the additional social, environmental and economic benefits that an organisation and its supply chain can make to society, by contributing to the well-being and resilience of individuals, communities and society in general.
- 3.50. Securing social value through development is considered to reflect the principles of sustainable development, which is at heart of national planning policy in relation to all three sustainability objectives – economic, environmental and, of course, social.
- 3.51. The [Social Value Portal](https://www.socialvalueportal.com/)²⁷ is an organisation which specialises in measuring and reporting social value for organisations in the public and private sectors. The portal, alongside other partners, has recently established a Planning Taskforce to consider how social value can be embedded into the planning process. The portal collaborated with its partners to submit a response to the government's Planning for the Future White Paper which 'demonstrated the importance of social value as the golden thread running through the reformed planning system'. One of their recommendations was that social value should be embedded at policy level with Local Plans including a Social Value Policy linked to new development, where overarching social value priorities for the planning authority are identified. They also advised that local authorities should utilise the 'Sustainability Assessment' proposed in the White Paper

²⁷ More information is available at: <https://www.socialvalueportal.com/>

to secure adherence to their local Social Value Policy by requiring a 'Social Value Statement' for all major applications.'

- 3.52. [A Local Needs Analysis](#)²⁸ was carried out by the Social Value Portal on behalf of the Council in 2020 with the aim to provide guidance for stakeholder, suppliers, developers, contractors and others working in Oldham to develop robust social value strategies. The recommendations coming out of the 2020 Local Needs Analysis as shown below at Figure 2 below illustrate the importance of social value and the role that planning can play in achieving it.

Figure 2: Recommendations from the Local Needs Analysis



²⁸ Available at: <https://www.oldham.gov.uk/info/200195/business/1901/procurement>

4. Infrastructure and Delivery and the Oldham Local Plan: Publication Plan

- 4.1. This section of the Topic Paper looks at each of the policies contained in the Infrastructure and Delivery 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 infrastructure and delivery;
 - 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 IN1: Digital Infrastructure and Telecommunications

Summary of evidence

- 4.3. NPPF states that advanced high quality and reliable communications infrastructure is essential for economic growth and social well-being and that planning policies should support the expansion of electronic communications networks, including next generation mobile technology and full fibre broadband connections.
- 4.4. Demand for access to digital services and the pressures this is placing on our digital connectivity infrastructure is growing exponentially. Oldham Council is implementing a digital strategy, so that where possible and there is resident demand, end-to-end digital services are available. Much of that strategy focuses on what the Council can do to improve its digital presence.
- 4.5. To deliver Oldham's inclusive growth ambitions it is intended to work with connectivity providers to drive investment in world class competitive broadband and mobile infrastructure across Oldham's growth priority areas backed by strong competitive coverage and capacity across all homes and businesses.
- 4.6. PfE policy JP-C2 'Digital Connectivity' sets out that we will support the provision of affordable, high quality, digital infrastructure and goes on to list a range of measures that will be supported in making decisions.

Draft Local Plan consultation and Duty to Co-operate

- 4.7. At Draft Plan stage some amendments were requested and more general comments made in relation to Policy IN1.
- 4.8. There were general comments of support from TfGM and National Highways who commented that the approach is in line with Department for Transport (DfT) Circular 01/2022 in that digital connectivity supports hybrid working, which reduces vehicles on the Strategic Road Network.

- 4.9. Manchester Airport requested an amendment to criterion 4 to read ‘New masts or telecommunications equipment will be permitted provided that: it can be demonstrated that the equipment will not cause any interference with other electrical equipment or detrimental impact on air traffic safety’. This amendment was made and criterion 4 of Policy IN1 now reads:

‘New masts or telecommunications equipment will be permitted where: it can be demonstrated that the equipment will not cause any interference with other electrical equipment or detrimental impact on air traffic safety’.

- 4.10. A detailed summary of responses received can be found in the Schedule of Comments and the Council’s Response’ document.
- 4.11. There are no specific Duty to Cooperate issues associated with this policy.

Policy Approach

- 4.12. Policy IN1 sets out that the Council will support the provision of infrastructure that extends and improves digital connectivity across the borough, particularly where it provides access to 5G and gigabit-capable full fibre technology.
- 4.13. It goes on to set out the criteria in which new masts or telecommunications equipment will be permitted. And concludes stating that all new residential and employment developments should enable Fibre to the Premises (FTTP) broadband infrastructure and sets out what will be required should this not be viable.
- 4.14. The Reasoned Justification explains that the purpose of the policy is to improve digital connectivity across the borough and explains that the Council is committed to securing high-quality communication infrastructure that is essential for growing. It also explains what planning applications should be accompanied by and explains the importance of the provision of gigabit-capable connectivity and ‘future-proofing’ new development.
- 4.15. Since Draft Plan, the policy has been amended to reflect the comment received from Manchester Airport in relation to criterion 4 as set out above.

Integrated Assessment

- 4.16. Policy IN1 scored a mixture of significantly positives, positives and neutrals. No mitigation or enhancements were required to the policy as a result of the IA.
- 4.17. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy IN2: Planning Obligations

Summary of evidence

- 4.18. Planning obligations can be used to mitigate the impacts of new development on existing infrastructure provision, such as that related to affordable housing, open space, sport and recreation, trees, biodiversity/ ecology, highways/ transport, social

value/ employment, educational (school) places and health facilities. They can be secured via s106 legal agreements or s278 legal agreements (for works to the existing highway).

- 4.19. Planning obligations may be provided by the developers 'in kind' – that is, where the developer builds, or provides directly, the matters necessary to fulfil the obligation e.g. to build a certain number of affordable homes on-site. Alternatively, planning obligations can be met in the form of financial payments to the Council to provide off-site infrastructure works or contributions towards providing affordable housing elsewhere in the Borough. In some cases, it can be a combination of both on-site provision and off-site financial contributions.
- 4.20. Oldham's IFS sets out the existing process for seeking planning obligations and sets out the amount of financial contributions that the Council has agreed, received, spend and allocated (but not spend) on an annual basis.
- 4.21. In terms of viability, the Viability Assessment (2025) has found that in general viability is difficult in Oldham. The lack of viability in some parts of the Borough is largely due to the high build costs and lower sales values across Oldham (particularly for housing). However, it notes that across the plan-period both land values and build costs are likely to experience changes, which may lead to a shift in the viability position across the area.
- 4.22. The assessment found that for most types of commercial development viability is challenging, however, retail warehousing and general retail are marginally viable.
- 4.23. In terms of residential development, viability is difficult for the development of brownfield land, although higher value areas are more viable (compared to low and medium value areas). For greenfield land, viability also remains challenging for low value areas, however viability improves for medium value areas and most schemes were found to be viable in high value areas. For Green Belt land, viability was difficult for lower and medium value areas (minor schemes were marginally viable within the medium value area), however the high value areas were viable.
- 4.24. In summary, the Viability Assessment provides a high-level assessment of the viability implications of the policies within the Local Plan. It is intended to inform policy preparation and provide a robust evidence base to support the Plan.
- 4.25. Despite the use of evidence-based cost assumptions in the assessment, in reality, schemes will have different build costs, policy costs and land values. Therefore, the assessment provides an indication for planning policy preparation purposes but is not absolute.
- 4.26. It is recognised, however, that viability is difficult in many parts of the Borough. As such there is scope for some flexibility and pragmatism for policies in the Plan.
- 4.27. The assessment recommends that plan wide viability should be reviewed on a regular basis to ensure that the Plan remains relevant as the property market changes.

Draft Local Plan consultation and Duty to Co-operate

- 4.28. As part of the Draft Plan consultation, several responses were received to policy IN2.

- 4.29. The comments received, issues raised and the Council's response to these issues are summarised in Table 1 below. There were also comments which supported the policy in general.

Table 1: Draft Local Plan Consultation Summary and Response – Planning Obligations

Comment/ Issue Summary	Council Response
<p>Objects to the policy wording as it does not accept lack of viability as an exception to the Playing Fields Policy or NPPF. Table IN1: - The reference to 'sport' in this policy is based on a standards approach to provision which is not acceptable to Sport England. This undermines the aims of the policy to provide new facilities based on demand. The provision should be based on local need and underpinned by an up-to-date assessment compliant with Sport England's PPS Guidance and ANOG approach and to accord with NPPF.</p>	<p>Table IN1 has been removed in the amended policy. Since the Draft Plan stage, the Oldham Playing Pitch and Outdoor Sports Strategy (2025) has been published. This provides an up-to-date assessment of playing pitch and outdoor sports and recreation provision in Oldham and includes an Action Plan. This has now informed policy CO1, which sets out that all playing fields, playing pitches and outdoor sports provision will be protected in line with the policy, national planning policy and other relevant policy and guidance. The proposed loss (in whole or part) of a playing field, playing pitch or outdoor sports provision will be considered on a site-by-site basis, having regard to Oldham's PPOSS (2025), and where appropriate, any loss of provision should be replaced by at least equivalent or improved provision in another location, as agreed by the Council, and relevant sporting bodies. Policy IN2 is in line with this policy. Policy IN2 sets out that 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 existing policy and guidance in NPPF and PPG.</p>
<p>Agree that discussions with the Council around planning obligations and requirements should be undertaken as early as possible. Agree with the policy in recognising that in some cases, a site-specific viability assessment may be required to robustly justify and evidence the level of planning obligations proposed.</p>	<p>Support noted.</p>
<p>Welcomed that the draft Plan includes this policy as residents in the Borough will benefit from planning obligations that brings forward infrastructure that facilitates active travel or sustainable travel. This may lead to a reduction in vehicles on the SRN as local residents will not need to travel outside of the Borough and meets with policies within DfT Circular 01/2022. Additionally, any highway infrastructure improvements will be beneficial as a</p>	<p>Support noted.</p>

Comment/ Issue Summary	Council Response
reduction in journey times and capacity issues will improve air quality.	
Consider the financial contributions associated to the management of Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors SAC and Holcroft Moss SSSI in light of modifications made within PfE. Specifically, JP-G5 and Policy JP-C7.	Natural England's position statement is set out in the Appendix of the South Pennine Moors SAC/ SPAs Joint SPD. This confirms there is currently no ecology evidence to show impact on conservation of the South Pennines SAC/SPAs from recreational disturbance. As such, no financial contributions are required at present.
Viability Assessment has not yet been prepared and as such it is not possible to comment on the viability of the policies proposed in this Plan. This policy states that in some cases, a site-specific viability assessment may be submitted where the need for such is evidenced by a change in circumstances which could not have been evident in the whole plan viability assessment. Concerned that the Council are restricting the circumstances where it is possible to submit a Viability Assessment. It is likely that the Viability Assessment, when prepared, will highlight viability challenges across Oldham, in which case it would seem inappropriate not to accept site specific viability assessments on all sites.	A Local Plan Viability Assessment (2025) has now been prepared and is available as part of the plan evidence base. In many cases in policy development, a balance has had to be found between supporting viability and ensuring that the Local Plan contributes to meeting local needs. Policy IN2 is clear 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.
Planning needs to consider the cumulative assessment of development on infrastructure and the effect of flood risk, as well as the impact on local services such as GPs, schools and general infrastructure.	The Plan's policies aim to ensure that development is supported by appropriate, necessary infrastructure. The Infrastructure Delivery Plan prepared to support the Plan also considers the borough's infrastructure needs.
Welcome the recognition of health infrastructure when securing developer contributions, where development proposals will make	In addition to Policy IN2, Policy CO6 sets out the policy for ensuring new development is supported by appropriate health provision The

Comment/ Issue Summary	Council Response
<p>provision to meet the cost of healthcare infrastructure made necessary by the development. Emphasize the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development. NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area. Recommend the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. Further guidance on a suggested process is included.</p>	<p>Infrastructure Delivery Plan prepared to support the Plan also considers the borough's health infrastructure needs. Engagement has also been carried out with relevant local health colleagues to prepare the Local Plan and its evidence.</p>
<p>Any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. The full detail of the development proposals are not yet known. For example, the detail of the drainage proposals, the points of connection or the water supply requirements. In the absence of such detail, we cannot fully conclude the impact on our infrastructure over a number of 5-year investment periods and therefore as more detail becomes available, it may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure. Recommend inclusion of a development management policy in your draft plan to this effect. Suggested wording is included.</p>	<p>The policy notes that 'or large-scale development or strategic sites subject to phasing it may also be appropriate to pool S106 monies raised from planning obligations, to contribute towards a piece of infrastructure or project that will support delivery of the whole site and its comprehensive development. The Council will work with developers to facilitate the delivery of provision as appropriate.'. In addition, the policy encourages developers to enter into early discussions with the Council to discuss planning obligations and requirements. This can include discussion around the infrastructure needs, timing and delivery of development which can be reflected in the planning obligation if necessary.</p>
<p>The Council should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement. The statement should identify the anticipated Section 106 funding towards this infrastructure. Also request a reference within the Local Plan to explain that developer contributions may be secured</p>	<p>Infrastructure requirements are set out within the Plan (the relevant policies). Infrastructure Funding Statements provide annual data on how much s106 financial contributions have been agreed, received, spent and allocated (but not spent) during the financial year. As such, it can provide an indication as to anticipated future fundings</p>

Comment/ Issue Summary	Council Response
retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth.	towards infrastructure. Planning obligations can be worded to ensure that future growth can be considered and calculations re-calculated or secured at a later date, where evidence exists to justify this. The policy provides appropriate direction to ensure that this can be considered as part of discussions with the Council. In addition, policy CO5 sets out the process for securing education provision (school places) from development. Housing growth is considered in the calculation of contributions for educational places, as is set out within the Communities Topic Paper.
TfGM supports the policy, however, Table IN1 includes Highways but not public transport service or infrastructure improvements or active travel infrastructure improvements both of which should be considered by developers first before considering the need to increase Highway capacity.	Table IN1 has been removed in the amended policy. The policy supports seeking planning obligations to secure any appropriate infrastructure (new or towards enhancing existing provision), where developments would increase the need or demand for infrastructure, services and facilities, beyond the capacity of existing provision.

- 4.30. A detailed summary of responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.31. There are no specific Duty to Cooperate issues associated with this policy.

Policy Approach

- 4.32. Policy IN2 is an overarching policy which sets out the approach to securing planning obligations, and considers viability, in line with national planning policy and PfE (specifically Policy JP-D2). Other policies within the Publication Plan, for example those on affordable housing, open space, sport and recreation provision and trees, set out specific policy requirements which may be secured by planning obligations.
- 4.33. The policy has been prepared to provide further clarification, to that set out in individual policies like affordable housing for example, regarding how the Plan will seek planning obligations and consider viability. It seeks to be flexible, in line with national planning policy and guidance, to allow for consideration of particular site characteristics and the impact these may have on viability, however the mechanisms within the policy, ensure that where possible the fullest compliance with the Local Plan is secured to ensure local needs can be met.
- 4.34. Policy IN2 sets out that where developments would increase the need or demand for infrastructure, services and facilities, beyond the capacity of existing provision, new provision and/or contributions towards enhancing existing provision will be required. Planning obligations will also be sought to secure the ongoing maintenance and management of provision where necessary.
- 4.35. It clarifies that where a site is in multiple ownership it will be ensured that all developers make a proportionate contribution to any planning obligations required to enable the delivery of the whole site, as well as those obligations specific to their individual development parcel.
- 4.36. Recognising that some sites may be constrained in terms of size or site characteristics, the policy sets out that in some circumstances, it may be more appropriate for planning obligations to go towards new or enhanced provision off-site. For large-scale development or strategic sites subject to phasing it may also be appropriate to pool S106 monies raised from planning obligations, to contribute towards a piece of infrastructure or project that will support delivery of the whole site and its comprehensive development. The Council will work with developers to facilitate the delivery of provision as appropriate.
- 4.37. The policy encourages developers to enter into early discussions with the Council to discuss planning obligations and requirements.
- 4.38. In relation to viability, policy IN2 sets out that in some cases, a site-specific viability assessment (which will be independently verified by the Council at the applicant's expense) 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 national planning policy and guidance. It goes on to note that where the site-specific viability assessment provides evidence to demonstrate that it is not financially viable to provide the level of planning obligations proposed, reduced planning obligations will only be permitted where:

1. The value of the planning obligations has been maximised having regard to likely viability;
 2. A clawback mechanism has been incorporated into a legal agreement, where appropriate, to ensure that additional mitigation is provided if final development viability is better than anticipated in the initial viability assessment; and
 3. The benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations.
- 4.39. The policy Reasoned Justification provides further detail on viability assessments and what they should include and consider. It notes that the weight to be given to any such site-specific viability assessment is a matter for the Council as the decision maker on a case-by-case basis, having regard to all the circumstances in the case, including whether the plan and the underpinning evidence remains up to date and any change in circumstances since the adoption of the plan. Following the outcomes of the individual site-specific viability assessment, if the Council is satisfied that there are overriding viability issues which prevent full compliance with policy requirements, it may be necessary to forgo a particular policy requirement to deliver another. Decisions in this respect will be made based on the evidence of local needs and priorities set out within the Infrastructure Delivery Plan.

Integrated Assessment

- 4.40. The policy scores a mixture of positive, neutral and uncertain. It was noted where the policy seeks to improve and increase infrastructure provision but that it also includes a viability exception for providing the full amount of planning obligations in site-specific circumstances, as is required by national planning policy. This could reduce the impact of planning obligations on this objective, however the extent to which is unknown as it is dependent on site-specific circumstances and could vary from site to site.
- 4.41. No negative scores were given and no mitigation or enhancement to the policy was required as a result of the IA.
- 4.42. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Policy IN3: Delivering Social Value and Inclusion

Summary of evidence

- 4.43. As set out in the Council's [Social Value Policy](#)²⁹, we are committed to creating a local area that meets our residents' needs. Social value is the golden thread between our Corporate Plan and the Oldham Plan objectives and our commissioning and procurement processes. This means purchasing goods and services which not only meet core requirements but also uphold our wider aspirations and strategic goals as a Council.

²⁹ The Council's Social Value Policy can be found at:
https://www.oldham.gov.uk/downloads/file/8282/social_value_policy

- 4.44. Incorporating social value into the planning process further helps to ensure that development created wider economic, social and environmental benefits. In particular:
- Integrating social value can lead to better health outcomes, inclusion and community cohesion.
 - It can promote local economic growth by creating jobs and training opportunities for residents and supporting local supply chains.
 - It can help address climate and biodiversity emergencies through encouraging the use of sustainable building techniques, reducing waste and energy consumption, and delivering biodiversity.
 - It can improve stakeholder buy in, boosts reputation and supports the broader ambitions of the Council and the Oldham Partnership.
- 4.45. The evidence supporting the need to Policy IN3 is set out in paragraphs 3.69 to 3.73.

Draft Local Plan consultation and Duty to Co-operate

- 4.46. As part of the Draft Local Plan consultation, several responses were received to policy IN3.
- 4.47. The comments received, issues raised and the Council's response to these issues are summarised in table 2 below. There were also comments which supported the policy in general.

Table 2: Draft Local Plan Consultation Summary and Response – Delivering Social Value and Inclusion

Comment/ Issue Summary	Council Response
Do not consider it necessary to include a policy requiring major proposals to provide details of what social value outcomes will be delivered and how this will be measured and assessed. This is an unnecessary burden to place on applicants and is unlikely to add value to a development, over and above the general benefits associated with development.	Noted. However, the evidence to underpin the proposed policy was provided within the Infrastructure and Delivery Topic Paper. Securing social value through development is considered to reflect the principles of sustainable development, which is at heart of the National Planning Policy Framework (NPPF), in relation to all three sustainability objectives – economic, environmental and, of course, social.
Welcomed that the Plan includes this policy as local residents will benefit through local employment opportunities and access to these opportunities that are not reliant on the private car. This may lead to a reduction in vehicles on the SRN as local residents will not need to travel outside of the Borough and meets with National Highways policy.	Support noted.

- 4.48. A detailed summary of responses received can be found in the Schedule of Comments and the Council's Response' document.
- 4.49. There are no specific Duty to Cooperate issues associated with this policy.

Policy Approach

- 4.50. Policy IN3 states that all development shall be located, designed, constructed and operated in such a way as to maximise its social value and that all major planning applications shall be supported by a Social Value Strategy. It goes on to say that a condition will be included on all relevant planning permissions to ensure the preparation and implementation of a Social Value Strategy, to be approved by the Council.
- 4.51. The policy then lists a number of criteria that the Social Value Strategy should consider in relation to the proposed development.
- 4.52. The Publication Plan policy is much the same as that in the Draft Plan. There have been changes to terminology and wording to provide greater however these do not alter the intentions of the policy. Reference to the Oldham Partnership's ambition of 'Uplifting Every Resident' has also been removed to 'future-proof' the policy.
- 4.53. The Reasoned Justification explains the outcome and recommendations of the Local Needs Analysis carried out by the Social Value Portal on behalf of the Council in 2022 and states that a key aspect of delivering social value through planning is economic inclusion and ensuring that residents share in the benefits of future development and economic growth.
- 4.54. As stated in paragraph 20.28 of Policy IN3 further guidance on what to include within a Social Value Strategy and the type of measures that could be used to assist developers in identifying how development can maximise its social value may be published to support its implementation.

Integrated Assessment

- 4.55. The policy scored a mixture of significantly positives, positives and neutrals. No mitigation or enhancements were required to the policy as a result of the IA.
- 4.56. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

Monitoring

- 4.57 Policies IN1 – IN3 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 is:
- Infrastructure Funding Statement: Total amount of money received secured through s106; Total amount of s106 receipts collected before the reported year but which have not been allocated; and Total amount of s106 expenditure for the reported year (including transferring it to another person to spend)

4.58 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 through the preparation of Supplementary Planning Documents.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.59 As these policies have been informed by PfE policies JP-D1, JP-D2 and JP-C2, the PfE monitoring framework will also help to monitor this chapter. The following PfE monitoring indicator will help to monitor these policies³⁰:

- Links provided to each Districts Infrastructure Funding Statement / Annual section 106 monitoring report
- Number of premises with full fibre connectivity

4.60 The monitoring framework is therefore considered to be appropriate to ensure the deliverability of IN1 to IN3.

Policy M1: Monitoring Framework

Summary of evidence

4.61. As set out in national planning guidance 'Local planning authorities must publish information at least annually that shows progress with local plan preparation, reports any activity relating to the duty to cooperate, any information collected which relates to indicators in the plan, and any policies which are not being implemented'. A key component of the monitoring framework will therefore be the annual preparation and publication of the Authorities Monitoring Report (AMR).

4.62. Monitoring is an important component of any development plan document and key to the success of this Local Plan. To be effective plans need to be kept up-to-date and monitored. We need to regularly monitor performance to assess whether our policies remain relevant, or whether they need to be updated.

Draft Local Plan consultation and Duty to Co-operate

4.63. The Draft Plan did not include a policy on monitoring. As part of the consultation, responses were received requesting a monitoring framework be included along with details as to how the plan will be monitored.

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

Policy Approach

4.65. The policy sets out the framework for the monitoring of policies contained within the Local Plan. It sets out what the AMR will do, explains that indicators are listed at the

³⁰ 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).

end of each chapter and sets out what may happen should monitoring identify underperformance or unintended outcomes.

- 4.66. The Reasoned Justification explains how as part of the Integrated Assessment (IA) of the Local Plan several proposed IA Objectives have been identified along with corresponding indicators. The indicators are then set out in a table.
- 4.67. The text goes on to explain that in addition to the Local Plan indicators a number of indicators are also monitored by GMCA to monitor Places for Everyone, The Greater Manchester Joint Waste Development Plan Document and the Greater Manchester Joint Minerals Development Plan Document.

Integrated Assessment

- 4.68. This new policy scored mostly positive with a couple of neutral scores. No mitigation or enhancements were identified.
- 4.69. In terms of the HRA the policy has been screened out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

5. Conclusion

Providing an appropriate strategy

- 5.1 Policies IN1 to IN3 and M1 of the Oldham Local Plan: Publication Plan provide the policy framework for ensuring that we deliver a diverse and sustainable housing offer across the Borough that is attractive and meets the needs of different sections of the population at different life stages.
- 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 the borough. Policies IN1 to IN3 set out a positive strategy to support delivery of the spatial strategy and future growth set out in PfE and its growth requirements. In particular, Policy IN2 recognises that new development should make a positive contribution to local communities and should not place unnecessary pressure on existing services, facilities, infrastructure and open spaces. As such, new development will be expected to contribute to new, and/or enhance existing, provision of services and facilities to ensure sustainable development. Whilst, ensuring new major development coming forward has regard to social value through the completion and implementation of their Social Value Strategy is a key part of how, through planning, we can help to support and deliver these ambitions and priorities.
 - b) **Justified:** policies IN1 to IN3 and M1 provide an appropriate strategy in relation to infrastructure and delivery matters across Oldham. Policies IN1 to IN3 support delivery of the Oldham Local Plan. IN1 will contribute towards the improvement of digital connectivity across the borough, recognising that securing high-quality communication infrastructure that is essential for growing. Policy IN2 sets out the process through which planning obligations will be secured where they are required to meet the need of new development coming forward. The Infrastructure Delivery Plan will help to inform how planning obligations are prioritised and spent.

The Oldham Partnership's ambitions for Oldham are set out within the Oldham Plan 2024-30. The Plan identifies three priorities – A Great Place to Live, Healthier Happier Lives, and Green and Growing. These reflect the Partnership's shared ambitions for Oldham, which are for vibrant, safe neighbourhoods where people are proud to live; opportunities for healthier, more fulfilled lives; and a sustainable, thriving economy. At the heart of this is the creation of a borough where residents feel a deep sense of belonging and ownership, where they can celebrate the unique identity and heritage of Oldham. Ensuring new major development coming forward has regard to social value through Policy IN3 and the completion and implementation of their Social Value Strategy is a key part of how, through planning, we can help to support and deliver these ambitions and priorities.

- c) **Effective:** the monitoring framework set out in Policy M1 will enable the Council to assess the implementation and effectiveness of the policies contained within

the Local Plan. Monitoring of the plan is essential to ensure that it delivers its vision and objectives, and to identify where policy intervention or review may be required. Finally, deliverability of the Oldham Local Plan: Publication Plan is also evidenced by the Infrastructure Delivery Plan and Statement of Common Ground.

- d) **Consistent with national policy:** paragraphs 2.2 to 2.13 above set out the national planning policies that IN1 to IN3 and M1 support the delivery of. The presumption in favour of sustainable development at paragraph 11 sets out that in relation to plan-making this means all plans should promote a sustainable pattern of development that: meets the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.

5.3 Furthermore, policies IN1 to IN3 and M1 are considered an appropriate strategy for Oldham as they contribute towards delivering the Local Plan's vision and plan objectives, and the Oldham Partnerships ambitions as set out above at paragraph 5.2b).