

Oldham

Local Plan

**Draft Local Plan Schedule of Comments
Received**

January 2026



Oldham
Council

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Abbreviations

The following is a list of abbreviations used in this report:

- **ANOG** - Assessing Needs and Opportunities Guidance
- **BEA** – Business and Employment Area
- **BNG** - Biodiversity Net Gain
- **DEFRA** - Department for Environment, Food and Rural Affairs
- **GI** – Green Infrastructure
- **GMCA** - Greater Manchester Combined Authority
- **GMLNRS** - Greater Manchester Local Nature Recovery Strategy
- **LGS** – Local Green Space
- **LPA** - Local Planning Authority
- **NPPF** - National Planning Policy Framework
- **OPOL** - Other Protected Open Land
- **PfE** - Places for Everyone
- **PPG** – Planning Policy Guidance
- **SAC** - Special Area of Conservation
- **SBI** – Sites of Biological Importance
- **SPA** - Special Protection Area
- **SSSI** - Sites of Special Scientific Interest
- **SRN** - Strategic Road Network
- **SUDS** - Sustainable Urban Drainage System
- **UDP** – Unitary Development Plan

1. Introduction

- 1.1 Oldham Council is preparing a new Local Plan to replace the existing Joint Core Strategy and Development Management Development Plan Document adopted November 2011 and any saved policies from the Unitary Development Plan (UDP) 2006.
- 1.2 Between 10th January and 25th February 2024, the Council consulted on the Draft Local Plan. It followed on from the earlier stages of the Local Plan Review preparation when consultation was carried out in the summer of 2017 on the Regulation 18 Notification and then the Issues and Options consultation which was carried out in July and August 2021.
- 1.3 This document summarises the comments received as part of the Draft Local Plan consultation and how these comments have been considered in preparing the Publication Plan.
- 1.4 Please note, since the Draft Plan there has been several policy changes and amendments (as is reflected in the Publication Plan). This includes policies which have been renumbered, amalgamated and some policies have also been deleted. For clarity, this is set out at the relevant sections below.
- 1.5 If you would like further help in interpreting this document, please contact the Planning Team on the following telephone number: 0161 770 4105. You can also email the team at SPI.Consultations@oldham.gov.uk.
- 1.6 All documents connected with the Local Plan Review are available on the Council's [Local Plan Review webpage](#)
- 1.7 An Integrated Assessment (IA) and a Scoping Report Update 2 was produced and published alongside the Draft Local Plan document. Comments received in relation to these documents have also been summarised in this document.

2. Summary of key issues raised and the Council's response

2.1 In total there were 77 respondents. Table KI1 below sets out a summary of the key issues that were raised during the Issues and Options consultation and how the Council has sought to address these issues.

Table KI1: Summary of the key issues raised

<p>Spatial Portrait</p> <p>Comments made requesting alterations and additions to the Spatial Portrait in relation to referencing mills, biodiversity, peat, canal towpaths, Peak District National Park and bus franchising.</p>
<p>Vision</p> <p>General support for the Vision with some suggestions to strengthen it, including making reference to opportunities for sport, an integrated transport system and amending the plan period to 2040 as a minimum.</p>
<p>Plan Objectives</p> <p>The objectives were generally supported, with some amendments suggested including the addition of how peat soils can mitigate against climate change, strengthening references to the Peak District National Park, mentioning Local Nature Recovery Strategies and Wildlife Trusts Building with Nature Project, including sports facilities and referencing sustainable modes of transport.</p>
<p>Homes</p> <p>Comments submitted regarding the sites within the Strategic Housing Land Availability Assessment (SHLAA)/ Housing Land Supply and their deliverability.</p> <p>Concern that more allocations are needed than are proposed for allocation to meet the borough's housing need.</p> <p>Promoting a diverse housing offer welcomed, however policy on housing mix should not be too prescriptive and a specific Oldham Town Centre mix should be considered.</p> <p>Comments that density standards should be in accordance with the National Planning Policy Framework (NPPF), and appropriate flexibility should be provided to allow developers to take account of site-specific conditions.</p> <p>Viable, greenfield and edge-of-settlement sites form part of a sustainable solution to meeting the borough's needs, not just high-density developments in the urban area.</p> <p>General support for providing homes for older people and for disabled people, however questions regarding whether the identified thresholds and a blanket approach is appropriate.</p> <p>Without a viability assessment some respondents felt they could not comment on the affordable housing policy.</p> <p>More evidence required to underpin the policy on Custom / Self Build and Community – led housing.</p>

A number of site-specific comments submitted regarding the suitability of proposed housing and mixed-use allocations along with further work that may be needed.

Economy and Employment

Site-specific comments received regarding the suitability of some of the proposed Business and Employment Areas and employment allocations, along with further work that may be needed.

Comments regarding the agent of change principle being included with Policy E1.

More transport evidence will be required to ascertain the impact on the Strategic Road Network of the employment sites.

Tourism

General support for the policies.

Comments regarding the need to improve Oldham's night-time economy, the need for more independent and artisan businesses.

A bus service to Dove Stones would be good.

References to accessing tourism destinations by sustainable transport and active travel modes should be included.

Farm diversification policy welcomed.

Holiday accommodation should be referenced in both policies.

Our Centres

Amendment to Oldham Town Centre and Shaw Centre requested to include Alexandra Retail Park and Shaw respectively.

Comments made regarding the need to improve our centres as they are falling into disrepair.

Criticism that Policy C3 requires a lower than NPPF Impact Assessment threshold without enough evidence to justify it.

General support that the policies should reduce the need to travel by car.

Oldham Town Centre

Comments regarding the desire to have Oldham Coliseum retained.

Civic Centre site is an important landmark and should not be lost.

Policies should help reduce car use.

Support for making more use of Oldham Town Centre for residential, though an objection to building big blocks of flats all over the town centre.

Support for improved public realm and a request to consider surface water management as part of this.

Support for green infrastructure improvements in Oldham Town Centre.

Addressing Climate Change

General support for policies that promote carbon neutral development but request policies should be implemented in line with December 2023 Written Ministerial Statement with regards to building regulations and zero carbon homes. Should not go above government targets.

Comments that Greater Manchester Combined Authority (GMCA) will not meet their commitment of carbon neutrality without taking into account the regions peat soils.

<p>In relation to renewable and low carbon energy and the 400m buffer, regard should also be had to the Functionally Linked Land and the protection of deep peat soils should also be referenced.</p> <p>The setting of the National Park should be listed as a constraint for renewable and low carbon energy.</p> <p>In relation to flood risk general support for the policy but comments made that it may be appropriate include reference to surface water risks in this paragraph relating to the sequential test, reference is also made to the need to consult with United Utilities regarding any risk of flooding from reservoirs.</p> <p>General support for sustainable drainage policy though Canals and River Trust state that discharges to their network require consent and recommended some text adding on that. Further comment that the opportunity for nature-based solutions should be reflected in the wording of the policy and that applicants must make space available in their proposals for multi-functional sustainable drainage. Requests that allocations in Places for Everyone (PfE) can be exempt from the requirement for a site-wide drainage, foul and surface water strategy.</p> <p>Comments regarding water efficiency include that adopting the optional standard for water efficiency of 110 litres per person per day is not justified nor consistent with national policy. Another comment that it lacks clarity in terms of how applicants for major non-residential developments should comply with it and that the target measure of water used for BREEAM 'Excellent' and 'Very Good' are the same.</p> <p>General support for Groundwater Source Protection Zones policy.</p>
<p>Natural Environment and Open Land</p> <p>General support for the policies.</p> <p>Recommend strengthening references to the Peak District National Park in relation to their new Duty.</p> <p>Requests for further releases from the Green Belt and a full Green Belt review.</p> <p>Green Belt policy is too detailed and it does not have to be as NPPF provides clear guidelines.</p> <p>The 30% figure for extensions to existing buildings must be fully justified.</p> <p>Site-specific comments made in relation to potential Local Green Spaces regarding their suitability.</p>
<p>Addressing the Biodiversity Emergency</p> <p>General support for Protecting Nature policy.</p> <p>Request a review of current green corridors.</p> <p>Comments made requesting Lapwings are added to the list of protected species and a request that reference is made to the protection of ecological corridors and to make sure that development does not adversely affect their function.</p> <p>In relation to BNG comments were received regarding the need to highlight that as part of biodiversity metric assessment process is split up into three distinct elements, habitats, hedgerows and rivers, the suggestion reference is made to wider ecological networks, the fact the policy may need to change as more BNG guidance emerges, a request to include reference to being able to obtain 'statutory biodiversity credits', asked to note that biodiversity mitigation / enhancement should not be located directly over water and wastewater assets and a request to require additional BNG where justified.</p> <p>In relation to green infrastructure it was stated that the evidence was not there for encouraging food production within a residential development and a number of respondents commented that the requirement for 20% tree cover is unclear and ambiguous and does not comply with paragraph 16(d) of the NPPF. There were comments supporting the use of GI in providing a nature-based solution to climate change.</p>

<p>The tree replacement ratios used were criticised as having the potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments and described as overly prescriptive and not supported by any technical evidence or policy basis.</p>
<p>Historic Environment</p> <p>General support for the policies. Some site-specific comments made regarding the Mills Strategy.</p>
<p>Creating a Better and Beautiful Oldham</p> <p>General support for the policies. Recommendations to include text around of the principles of healthy design, utility constraints active design and surface water management. Requests that allocations in PfE can be exempt from the requirement to reduce the scale of bulky buildings. Wording for inclusion on development proposals linking to opportunities to manage surface water and reduce flood risk. Comment made that Design Review is a tool that should be used appropriately and in a proportionate manner. Some concerns regarding the policy concerned with tall buildings in relation to ecology, the potential impact on air navigation and what evidence base has been used to inform it.</p>
<p>Creating a Sustainable, Active, Accessible Network for Oldham</p> <p>Request reference should be given towards offsite improvements to walking and cycling infrastructure. Comments made to encourage Active Design Guidance being referenced within this section. Comment made that it is not consistent with national policy to require new development reduce road casualties, improve highways safety and address traffic congestion. Policies should encourage economic and transport links with Manchester Airport are considered. Comment that the requirement for non-residential developments including a minimum of 20% of spaces with active charging facilities, may be challenged unless there is evidence that demonstrates all spaces for non-residential development will need to provide passive provision. This may be difficult to demonstrate given that it is envisaged that a significant amount of EV charging is anticipated to be done at home. Transport Assessments and Statements should include information on all modes of travel including public transport not just vehicle and pedestrian movements. Comments made regarding including specific reference to the requirement of screening all transport assessments for all allocated development policies (specifically more than 100 vehicles or 20 Heavy Good Vehicles which may pass Holcroft Moss SSSI along the M62).</p>
<p>Communities</p> <p>General support for the open space policies with the exception of Sport England who did not support a standards-based approach. General support for the cultural, community and health facilities policies, however comments that the NHS requires flexibility with regards to the use of its estate and whether it is surplus to requirement is judged by local health commissioners and NHS England.</p>

<p>In relation to securing education places through developments, comments received that as a Viability Assessment has not been produced comments cannot be made.</p> <p>Request made that greater clarity over how developer contributions will be sought to meet the need for early years, post-16 and SEND Places.</p> <p>Comment that the requirement for HIA for developments of 100 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by national guidance and where a development is in line with policies in the local plan a HIA should not be necessary.</p> <p>Comments made regarding the public transport and key services definitions.</p>
<p>Protecting Our Local Environment</p> <p>General support for the policies.</p> <p>Comment that the Local Plan should include a policy for the protection of Best and Most Versatile (BMV) agricultural land.</p> <p>Comment that there should be a policy within the Local Plan which captures the agent of change principle to protect the operation of existing businesses / operations from encroachment issue.</p> <p>Policy should be re-worded to refer to the potential submission of land stability reports to address land instability issues.</p> <p>Comment made in relation to air quality alignment should be made to PfE with regard the proposed mitigation that is required to avoid adverse effects at Holcroft Moss SSSI under JP-G9 Policy JP-C7.</p>
<p>Infrastructure and Delivery</p> <p>Multiple comments regarding a lack of a Viability Assessment and as such it is not possible to comment on the viability of the policies proposed in this Plan.</p> <p>Comments made regarding concern that the council are restricting the circumstances where it is possible to submit a Viability Assessment.</p> <p>Request that air traffic safety is referenced in relation to new masts or telecommunications equipment.</p> <p>Request 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 are included.</p> <p>Request that there is a need to set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement.</p> <p>It may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure, wording setting out this should be included.</p> <p>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.</p> <p>Mixed comments received regarding the need for a Social Value policy, some support but another comment that it is a unnecessary burden.</p>
<p>Monitoring</p> <p>Some amendments to indicators and suggestions for new indicators were submitted.</p>
<p>Overarching / General Comments</p> <p>To be consistent with NPPF, the plan period should be extended to 2040 at the earliest.</p>

There is too much reliance on brownfield land in the plan.

The documents are too long and too complicated.

The health and well-being benefits of local green space are clear as well as other benefits of not traveling to enjoy countryside. More development puts pressure on our greenspace, including sensitive ecology and we hope the Oldham Local Plan will be cautious about where needed new development goes.

Manchester Airport request that they are afforded policy protection to ensure that its operational safety and efficiency are not compromised.

3. Responses submitted on the Spatial Portrait

Table SP1: Responses submitted on the Spatial Portrait

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	There is a 'The Built Environment' section but all three paragraphs (5.20 to 5.22) talk about the historic environment. This requires clarification. The section would benefit from referencing the mills work like reference has been made to other sections. This would also tie in with the format and references within the rest of the Plan. When referring to Historic England's At-Risk Register use a date. This is because the Register is updated on a yearly basis and the Plan's reference my change (and any conservation area entries).	Amended title to say historic environment. Added reference to the Oldham Mills Strategy. A date has been added to the most recent heritage at-risk register and the number of entries amended.
DLP32	Martyn Walker	Lancashire Wildlife Trust	In general agreement with paragraph 2.3 but would like to see biodiversity included. Access to nature is central to providing a desirable place to live and green spaces do not necessarily always provide biodiverse environments. The aim should therefore be amended to read 'A clean, green, biodiverse and healthy environment'. Welcome and support the aim in paragraph 2.10.	These aims are from the Oldham Plan which is a separate document. However, in responding to the biodiversity duty the Council has published its biodiversity policies and objectives which includes an action to consider biodiversity in future reviews of corporate documents.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Paragraph 5.17 should reference the importance of the underlying peat soils within the South Pennine Moors and how appropriate management, such as rewetting of the peat soils can help to mitigate the effects of climate change, reduce flood risk and reduce the devastating effects of wildfires. Agree with and	Support noted. Text added to paragraph on the need to improve peat.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			welcome paragraph 5.19 in relation to green infrastructure provision.	
DLP11	Simon Tucker	Canals and River Trust	Paragraphs 5.23 to 5.26 refer specifically to transport within Oldham borough. However, there is not sufficient reference made to existing walking and cycling routes. The towpath network offers a route for walking and cyclist use separated from vehicular traffic, which could active travel in the borough. Request that this section of the plan should be expanded so that routes for active travel are more thoroughly referenced, including towpaths.	Comment noted. Text added to spatial portrait in relation to the borough's walking and cycling network, including reference to towpaths.
DLP33	Sarah Welsh	Peak District National Park	Paragraphs 5.12 - 5.19 do not reference the National Park. The important relationship Oldham has with the National Park landscape needs further explanation.	Text added to spatial portrait regarding the PDNP.
DLP39	Alan Chorlton		Paragraph 5.5 quotes Oldham's Housing Strategy in relation to the proportion of pre 1919 terraced homes. The Local Plan, to balance this, needs to provide sufficient land for residential development outside of the inner area.	Comment noted. The local plan seeks to ensure a diverse mix of housing in all areas of the borough, where development would be consistent with NPPF, PfE and local plan policies.
DLP71	Richard Clowes	TfGM	Paragraphs 5.23 - 5.26 could include a short paragraph on Bus Franchising and the development of the Bee Network.	The Bee Network is set out in the, 'A Sustainable, Active, Accessible Network for Oldham' chapter. The Local Plan should be read as a whole.

4. Responses submitted on the Vision

Table V1: Responses submitted on the Vision

Id No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP32	Martyn Walker	Lancashire Wildlife Trust	Wording at paragraph 6.3 should be amended, to read 'responding to both the Biodiversity and the Climate Change emergencies.' Councils have a biodiversity duty. This should be addressed within the Chapter on Policy Context and Legal Requirements.	Amendment made.
DLP34	Pauline Shearer	Sport England	Would like to see as part of the Vision, the inclusion of promoting opportunities for sport.	Vision has been amended to read 'They will have access to local community facilities and health and well-being provision and will have active and healthier lifestyles gained from access to active travel, green infrastructure <u>and opportunities for sport and recreation.</u> '
DLP49	Olivia Carr	Turleys on behalf of Northstone	Supports the Vision in principle and agrees with matters relating to the natural environment, green infrastructure, provision of a range of quality homes, sustainability, prosperity of the local economy and the health and wellbeing of local residents and communities. However, recommend that the Vision is updated to reflect a realistic plan period – to 2040 as a minimum and the delivery of 'around' 11,560 new homes should be amended to reflect this as a 'minimum' figure, as per PfE, and to convey that Oldham will adopt a pro-growth strategy and ambition for the borough.	The vision has been amended to include ' <u>around</u> 11,560 new homes' to reflect that the figure is a minimum (in line with Policy H1 and PfE). The Local Plan is a Part 2 Plan to Places for Everyone (PfE). As such, the plan period is in line with the PfE plan period of 2022-2039.

Id No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP61	Andrew Leyssens	United Utilities	Support the Vision which makes specific reference to the Climate Change emergency. Welcome the reference to being a carbon neutral exemplar with a resilient and multifunctional green infrastructure network. The need to respond to the climate emergency should be a 'golden thread' running through all development plan policies.	Support noted. Responding to the climate change emergency is a thread through the plan as shown through plan objectives and plan policies which show linkages back to plan objectives.
DLP71	Richard Clowes	TfGM	Supports the Vision. Paragraph 6.6 does not make reference to an integrated transport system (the Bee Network) in terms of integrated services, modes, information or payment types making it easier for people to move between services and modes of transport on a single high quality, easy-to-use network; maximising choice and supporting low-car lifestyles. The second sentence could start. "We will have an integrated transport system..."	Comment noted. Vision amended to include reference to an 'integrated' transport system.
DLP3	Emily Hycran	Historic England	Welcome the content of paragraph 6.28. The title of this section and that of the Spatial Portrait should match if it is to be carried through the document.	Clarified comment is in relation to 6.2 to 6.8. Title in spatial portrait amended to match wording in vision.
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Strongly support the Vision that will ensure by 2039 Oldham Town Centre is a place that thrives.	Support noted.
DLP11	Simon Tucker	Canals and River Trust	The reference to canals on the Key Diagram will help to ensure that our network is identified by both decision makers and prospective developers, which could make the plan more effective in maximising the benefits of canalside development.	Support noted.
DLP57	Julie Ball		Good long-term vision.	Support noted.

5. Responses submitted on the Plan Objectives

Table PO1: Responses submitted on the Plan Objectives

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	PO1 - Support the development of brownfield sites, some brownfield sites are important for historic importance, wildlife and can be of high environmental value. May wish to refer to Open Mosaic Habitat Inventory as starting point for assessing environmental value.	Text added to supporting justification of Policy N1 explaining open mosaic habitats. As such, no amendment to PO1 considered necessary in this regard.
DLP34	Pauline Shearer	Sport England	PO1 - Encourage reference to new developments incorporating the principles of Active Design Guidance.	References to Active Design are included throughout the Plan, including in Policies D1, N3, T1 and CO2. As such it is not considered that a reference is needed in the plan objectives.
DLP49	Olivia Carr	Turleys on behalf of Northstone	PO1 - Support the plan objectives, in particular PO1 relating to 'building quality homes to meet local needs and diversify the housing offer'. Request that this objective is updated at point one to reflect that the housing requirement of 11,560 is a 'minimum'.	PO1 amended to add ' <u>around</u> 11,560' to reflect the vision amendment and the fact that the requirement is a minimum (in line with Policy H1 and PfE).
DLP62	Sue Skinner	Dobcross Village Community Association	PO1 - Suggest amending the following bullet point to read - ensuring appropriate densities and making the best and most effective use of brownfield land without infringing on Green Belt land, unless absolutely necessary.	Policy H1 is clear that we will support the development of brownfield land and policy H2 aims to maximise the use of our land in sustainable urban locations. However, in line with NPPF other land can come forward for development and will be assessed against relevant policies within national and local

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				planning policy. The Green Belt retains strong protection through NPPF.
DLP23	Joanne Harding	Home Builders Federation	PO1 - It is appropriate for the council to identify housing as an objective for the Plan.	Support noted.
DLP39	Alan Chorlton		PO1 - The bullet points for this objective are lacking one around the choice element, there should be a choice of homes and sites rather than the limited offer within the draft Local Plan at the moment.	Oldham's housing land supply includes a range of potentially suitable housing sites. In addition, the reasoned justification of Policy H1 clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing (and mixed-use) development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.
DLP14	Zoe Haystead	Natural England	PO2 - Demand for green jobs is increasing as industries prepare themselves for a greener future and net zero and welcome the existing reference. Advise that further consideration should be given to encouraging investment in green jobs/skills as a means of reducing unemployment and encouraging economic growth and investment.	Comment noted. The Economy and Employment chapter recognises the importance of investment in green jobs and skills. Paragraph 9.4 of the Publication Local Plan emphasises the Council's ambitions regarding the building of the Green Technologies and Services sector (GTS).
DLP14	Zoe Haystead	Natural England	PO4 - Recommend further consideration of connecting people with nature and reflect any commitment made to green infrastructure and open spaces. Urban interventions such as living roofs, living walls, and planters, can provide a	Comment noted. No amendment made. There are other plan objectives in relation to nature, green infrastructure and open spaces and the Local Plan should be read as whole.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			variety of ecosystem services, in biodiversity, mental and physical health, and climate change.	
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	PO4 - Strongly support the objectives in the Local Plan that will ensure by 2039 Oldham Town Centre is a place that thrives.	Support noted.
DLP14	Zoe Haystead	Natural England	PO5 - May also wish to refer to the Manchester Pennine Fringe National Character Area (NCA).	PfE includes Policy JP-G1 which is based on the GM Landscape Character and Sensitivity Assessment. This has taken into account the national character areas. The Oldham Local Plan does not wish to repeat this policy area.
DLP26	Dan Ingham	Elswood Family (Stantec)	PO5 - Support this objective, however it does highlight that any Local Green Space Designation should concern land that has a public benefit, therefore indicating that it should not include private land.	Wording "that are special to local communities" removed for clarity. However, LGS can include private land that the public may appreciate being there.
DLP33	Sarah Welsh	Peak District National Park	PO5 - Recommend strengthening references to the National Park - text on the new version of Section 62 Duty provided and the Local Plan should reflect that version. The Key Diagram should identify the National Park.	Plan objective amended to read protecting and furthering the purposes of the Peak District National Park. The Key diagram will be amended.
DLP32	Martyn Walker	Lancashire Wildlife Trust	PO5 - Welcome and support this objective.	Support noted.
DLP14	Zoe Haystead	Natural England	PO6 - Recommend the protection and enhancement of designated sites is clearly stated. May wish to refer to Local Nature Recovery	Amendments have been made to refer to core areas of wildlife which includes designated sites and irreplaceable

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			Strategy (LNRS) when referring to the implementation of a nature recovery network.	habitats. Reference has also been made to the LNRS.
DLP32	Martyn Walker	Lancashire Wildlife Trust	PO6 - Welcome and support this objective.	Support noted.
DLP61	Andrew Leyssens	United Utilities	PO6 - Supportive of the plan objectives, in particular the references to nature-based solutions.	Support noted.
DLP14	Zoe Haystead	Natural England	PO7 - Strongly recommend that the protection and restoration of peatlands is included within the objective.	Amended to refer to protecting and reinstating restorable peat.
DLP32	Martyn Walker	Lancashire Wildlife Trust	PO7 - Welcome and support this objective. However, this section should also reference the part peat soils can play in mitigating against climate change and commit to refusing development on peat soils, especially where they can be rewetted. Development adjacent to peat soils should seek to protect and rewet peat soils as part of any mitigation/compensation plan.	Amended to refer to protecting and reinstating restorable peat.
DLP61	Andrew Leyssens	United Utilities	PO7 - Supportive of the plan objectives, in particular the references to achieving high standards of sustainable design and construction, reducing the risk of flooding, managing flood risk and promoting the efficient use of water resources and quality.	Support noted.
DLP14	Zoe Haystead	Natural England	PO8 - Green Social Prescribing (GSP) and Biodiversity Net Gain (BNG) could be made as a source of funding/investment for improvements in parks and open spaces. GSP is the practice of supporting people in engaging in nature-based interventions and activities to improve their mental health, whilst offering nature recovery benefits	Plan objective amended to include reference to "connecting people to nature".

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			which you may wish to refer to within the objective.	
DLP32	Martyn Walker	Lancashire Wildlife Trust	PO8 - Welcome and support this objective.	Support noted.
DLP34	Pauline Shearer	Sport England	PO8 - Supports the facilitation of health and wellbeing of Oldham residents and the inclusion of a direct reference to protect and enhance sport and recreation facilities. The second part of this should be enhanced to include sports facilities (suggested text provided).	PO8 - bullet 2 amended to include reference to sport and recreation facilities.
DLP3	Emily Hycran	Historic England	PO9 - The title refers to 'built environment'. Whilst this is supported, Oldham is more than just buildings and this section of the Plan should make sure that it doesn't just cover the built environment.	Title amended to refer to historic and built environment. Reference to mills added.
DLP32	Martyn Walker	Lancashire Wildlife Trust	PO9 - Agree with and welcome the requirement for place building. Include reference to the Wildlife Trust's Building with Nature (BwN) Project. This is a voluntary agreement that offers an assessment and accreditation service to secure the delivery of high-quality green infrastructure in new and existing communities. It can be used to certify a development or can award accreditation to policy documents for those councils seeking independent validation of the quality of their policy in relation to delivery of high-quality GI. BwN serves as a national exemplar of a standard to be expected in the context of development and green infrastructure, including biodiversity.	Reference to Building with Nature has been added to Policy N3.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP34	Pauline Shearer	Sport England	PO9 - Encourages development to take account of Active Design Guidance.	Active Design Guidance is referred to in Policy N3, CO2 and D1.
DLP34	Pauline Shearer	Sport England	PO10 - Encourages active travel and its linkage with their Active Design Guidance.	Comment noted. No amendment made. Active Design Guidance is referenced in Policy T1 'Oldham's Transport Priorities' and the Local Plan should be read as a whole.
DLP71	Richard Clowes	TfGM	PO10 - TfGM supports the objective but none of the bullet points refer specifically to sustainable modes of transport other than walking and cycling (active travel), and there is no specific reference to public transport. Suggested amendments to three of the bullet points provided to address this.	Suggested amendments made.

6. Responses submitted on the Homes Policies

Table H1: Responses submitted on Policy H1 Delivering a Diverse Housing Offer

The table below also includes general comments submitted in regard to housing delivery – namely those related to the Plan’s approach to housing, housing land supply, and housing requirement.

ID No / Ref	Name	Organisation	Summary of Comments	Council’s Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistry Group	This policy should be reviewed, and further clarity provided. The wording is currently ambiguous in that it suggests any/all sites identified in the SHLAA will be supported for development, however it does not reference the status of SHLAA sites – whether they are identified as suitable, available and developable or otherwise, or identified in the 0-5 year supply, 6-10 years and so forth. The supporting text to the policy then continues to suggest that sites will be supported if they are previously developed whether they are identified or not in the SHLAA. This needs to be clarified.	References to the SHLAA within the policy have been removed in the Publication Plan. The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing (and mixed-use) development where the proposed development is consistent with national planning policy and guidance, PFE and other Local Plan policies.
DLP15	Anne McQueen		Support the policy.	Support noted.
DLP20	Artur Korszon		Object to the policy, too much money has been spent on social housing by the government. More money should be allocated to the NHS and Police services. Social housing is being abused by many people and should only be available to people in real need. Have concerns about the impact of	The purpose of the policy is to ensure an adequate supply of homes in Oldham. The comment doesn't relate to the content of the policy.

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			social housing on the environment and the preservation of Green Belt.	
DLP23	Joanne Harding	Home Builders Federation	Policy should be reviewed for clarity and to ensure that it does not repeat national policy unnecessarily. Concerned that the policy states that planning applications will be permitted where the site is identified within the SHLAA, but then sites in the SHLAA are mentioned again in the next paragraph where it states that they will be considered favourably where they are previously developed and comply with national policy and guidance, PfE and Local Plan policies. Consider that this creates inconsistency in relation to sites identified in the SHLAA. Also, the policy does not actually identify the status that a site may have in the SHLAA.	References to the SHLAA within the policy have been removed in the Publication Plan. The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing (and mixed-use) development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Whilst we support the development of brownfield land over greenfield, it is important to recognise that brownfield sites can provide biodiversity 'hot-spots' within the urban environment. The combination of semi-natural vegetation and hard surfaces can be especially important for invertebrate communities.	Noted. The ecological value of brownfield sites will be considered as part of any planning application as is standard. This policy should be read alongside policies N1, N2 and N3 - which consider biodiversity and Green Infrastructure.
DLP43	Wiktora Sypnicka	Emery Planning on behalf of Joe Jaskolka	It is not clear how the approach to distribution of development will address the lack of affordable	The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the

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			<p>housing within the East Neighbourhood. In addition, a housing requirement should be set out for the Saddleworth Neighbourhood Area in accordance with NPPF. A clear distribution of development should therefore be provided within the plan and the lack of development in the areas most in need of affordable housing be justified. Detailed comments also provided on the SHLAA and the housing land supply, concluding that the plan needs more allocations.</p>	<p>delivery of all housing development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.</p> <p>The identified housing land supply provides a range of sites (from small sites to large sites, including the PfE Strategic Allocations) in diverse locations (including within Oldham Town Centre and the borough's other centres, urban areas and urban-fringe areas). It also identifies sites for redevelopment and also sites suitable for conversion i.e. mills. It should be noted that the housing land supply is indicative, especially into the medium and long term and therefore housing development may come forward in other areas and for different schemes than anticipated. For some parts of the borough, development is constrained by Green Belt, topography, available land supply and other policy constraints such as ecological designations. As such, delivering an even distribution of land supply across the different areas of the borough is not possible. However, the SHLAA does identify a range of development sites, in a range of different locations to support the delivery of a diverse housing land supply. In addition, as noted above other suitable sites may come forward.</p> <p>The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use</p>

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				development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP44	Wiktorja Sypnicka	Emery Planning on behalf of Chasten Holdings Ltd	It is not clear how the approach to distribution of development will address the lack of affordable housing within the East Neighbourhood. In addition, a housing requirement should be set out for the Saddleworth Neighbourhood Area in accordance with NPPF. A clear distribution of development should therefore be provided within the plan and the lack of development in the areas most in need of affordable housing be justified. Detailed comments also provided on the SHLAA and the housing land supply, concluding that the plan needs more allocations.	<p>The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.</p> <p>The identified housing land supply provides a range of sites (from small sites to large sites, including the PfE Strategic Allocations) in diverse locations (including within Oldham Town Centre and the borough's other centres, urban areas and urban-fringe areas). It also identifies sites for redevelopment and also sites suitable for conversion i.e. mills. It should be noted that the housing land supply is indicative, especially into the medium and long term and therefore housing development may come forward in other areas and for different schemes than anticipated. For some parts of the borough, development is constrained by Green Belt, topography, available land supply and other policy constraints such as ecological designations. As such, delivering an even distribution of land supply across the different areas of the borough is not possible. However, the SHLAA does identify a range of</p>

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				<p>development sites, in a range of different locations to support the delivery of a diverse housing land supply. In addition, as noted above other suitable sites may come forward.</p> <p>The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.</p>
DLP49	Olivia Carr	Turleys on behalf of Northstone	<p>Request an amendment to paragraph 8.3 to state the number of homes Oldham Council is required to deliver is a minimum number in line with PfE Policy JP-H1. Table H1 in the Draft Plan should be updated to reflect the phasing of the housing requirement beyond 2039. Detailed comments provided on the SHLAA and over-reliance on sites within the urban area. It is Northstone's view that to address the challenges and issues identified in the Draft Local Plan and the council's evidence base, additional larger-scale sites outside of the urban area are required. No other detailed comments on Policy H1 other than to reiterate that delivery of the diverse housing offer required will not be met due to the</p>	<p>The Publication Plan policy has been amended in reference to the housing requirement being a 'minimum' figure, in line with PfE policy JP-H1. The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.</p> <p>The identified housing land supply provides a range of sites (from small sites to large sites, including the PfE Strategic Allocations) in diverse locations (including within Oldham Town Centre and the borough's other centres, urban areas and urban-fringe areas). It also identifies sites for redevelopment and also sites suitable for conversion i.e. mills. It is considered that the</p>

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			composition and reliance on the land supply.	housing land supply provides a diverse supply of housing, however as noted above other suitable sites may come forward.
DLP50	Rebecca Dennis	Pegasus on behalf of Mr & Mrs P.D. Martin	The policy says that development will be permitted where the site is allocated for residential development through the PfE Plan or the Local Plan. If the PfE Plan is not adopted for whatever reason, the site at Sumner Street would be suitable for its own allocation in the Local Plan. The council are clearly not averse to allocating greenfield sites and we urge the council to consider the site at Sumner Street as a potential housing allocation, in the event that PfE is not adopted.	PfE was adopted in March 2024, becoming part of Oldham's development plan. The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. Sumner Street is identified within PfE Strategic Allocation JPA10 Beal Valley.
DLP52	Andrew Bradshaw	CRE8 land & Planning	Submitted land off Maltby Court for inclusion in the SHLAA.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. Submission considered as part of SHLAA update and discounted as it is within a proposed Local Green Space and an existing designation within the Core Strategy - Other Protected Open Land (OPOL) 11. See SHLAA Discounted Sites Appendix 4.
DLP56	Jon Power	Asteer Planning on behalf of Saddleworth Property	Comments on the existing housing land supply and need and states there is a shortfall, proposes their site at Saddleworth Business Park be developed as a highly accessible	The identified housing land supply provides a range of sites (from small sites to large sites, including the PfE Strategic Allocations) in diverse locations (including within Oldham Town Centre and the borough's other centres, urban areas and

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		Partnership (SSP)	brownfield site that can deliver high quality residential development.	<p>urban-fringe areas). It also identifies sites for redevelopment and also sites suitable for conversion i.e. mills. It is considered that the housing land supply provides a diverse supply of housing and is sufficient to meet local housing needs, however as noted above other suitable sites may come forward.</p> <p>The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. Submission considered as part of SHLAA update and discounted as it is within a proposed Employment Area (and is within an existing Employment Area within the Core Strategy). See SHLAA Discounted Sites Appendix 4.</p>
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	The approach to promoting a diverse housing offer to meet local need is welcomed as is the commitment to permitting, in whole or as part of mixed-use schemes, sites allocated for residential development or identified within the SHLAA. The prioritisation of previously developed land in sustainable locations is also welcomed.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP59	Chris Sinton	CBRE on behalf of Estuary Park Property Holdings Ltd - Shaw Distribution Centre (phase 2)	The approach to promoting a diverse housing offer to meet local need is welcomed as is the commitment to permitting, in whole or as part of mixed-use schemes, residential development allocated in the Local Plan.	Support noted.
DLP63	Lizzie Schofield	Millson Group on behalf of Stonesbreak Group	Detailed evidence will be required to demonstrate that sites within the supply are developable, available and suitable. Policy confirms that proposed developments not identified within the SHLAA, PfE, Local Plan or small sites, will be considered favourably where they are previously developed land and they comply with national planning policy, guidance, PfE and Local Plan policies. Agree that the policies should include support for the redevelopment of brownfield land and recognises the high rate of historic delivery on previously developed land. Policy also establishes that all residential development should be sustainably located, with public transport, local services and facilities accessible to the development by active travel - the former Springhead Quarry site meets this requirement.	The SHLAA (2025) contains a range of documents and appendices to evidence that the land supply is suitable, available and achievable (in line with PPG). In addition, to support the Publication Plan (namely this policy) a Land Supply Evidence Document has been prepared to provide further detail on the housing land supply, and previous housing delivery (within the plan period, prior to the examination of the Publication Plan). This focuses on the five-year housing land supply (anticipated from potential adoption of the Plan) but also provides detail on the medium- and long-term supply.

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DLP64	Steve Harris	Emery Planning on behalf of Mr W Lumb	Detailed comments provided on the SHLAA and the housing land supply, concluding that the plan needs more allocations.	<p>The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.</p> <p>The identified housing land supply provides a range of sites (from small sites to large sites, including the PfE Strategic Allocations) in diverse locations (including within Oldham Town Centre and the borough's other centres, urban areas and urban-fringe areas). It also identifies sites for redevelopment and also sites suitable for conversion i.e. mills. It should be noted that the housing land supply is indicative, especially into the medium and long term and therefore housing development may come forward in other areas and for different schemes than anticipated. For some parts of the borough, development is constrained by Green Belt, topography, available land supply and other policy constraints such as ecological designations. As such, delivering an even distribution of land supply across the different areas of the borough is not possible. However, the SHLAA does identify a range of development sites, in a range of different locations to support the delivery of a diverse housing land supply. In addition, as noted above other suitable sites may come forward.</p> <p>The Publication Plan no longer includes site</p>

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				allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP65	Steve Harris	Emery Planning on behalf of Sheridan Group	Detailed comments provided on the SHLAA and the housing land supply, concluding that the plan needs more allocations.	<p>The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.</p> <p>The identified housing land supply provides a range of sites (from small sites to large sites, including the PfE Strategic Allocations) in diverse locations (including within Oldham Town Centre and the borough's other centres, urban areas and urban-fringe areas). It also identifies sites for redevelopment and also sites suitable for conversion i.e. mills. It should be noted that the housing land supply is indicative, especially into the medium and long term and therefore housing development may come forward in other areas and for different schemes than anticipated. For some parts of the borough, development is constrained by Green Belt, topography, available land supply and other policy constraints such as ecological designations. As such, delivering an</p>

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				<p>even distribution of land supply across the different areas of the borough is not possible. However, the SHLAA does identify a range of development sites, in a range of different locations to support the delivery of a diverse housing land supply. In addition, as noted above other suitable sites may come forward.</p> <p>The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.</p>
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	The approach to promoting a diverse housing offer to meet local need is welcomed as is the commitment to permitting, in whole or as part of mixed-use schemes, sites allocated for residential development or identified within the SHLAA. The prioritisation of previously developed land in sustainable locations is also welcomed.	Support noted. As set out in the policy reasoned justification, the redevelopment of brownfield land is central to achieving sustainable development and maximising our housing land supply and the Council will encourage the redevelopment of suitable brownfield land (the majority of sites identified within the SHLAA are brownfield), however there are also a number of sites which are made up of both brownfield and greenfield land, and also some greenfield sites. It is important in meeting our housing requirement and addressing local needs, that we deliver all sites within our housing land supply. This policy

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				supports the delivery of the housing on other suitable sites that may become available.
DLP68	Jon Phipps	Lathams on behalf of Whiteoak Ltd (Purico)	With exceptional brownfield sites within the Green Belt (such as PfE JPA13) it should be accepted that access to transport and services may not be optimal.	<p>The policy supports development proposals that are in sustainable and accessible locations and that promote and encourage use of public transport, walking, wheeling and cycling. It requires that all development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL) 4 or above. However, it states that this should be met unless it can be demonstrated by the applicant that it is not appropriate, or the development provides exceptional benefits to the surrounding environment and community, therefore allowing for the consideration of individual site circumstances.</p> <p>In addition, as part of any relevant planning application, consultation will take place with highways colleagues, Transport for Greater Manchester and other relevant statutory bodies where appropriate.</p>
DLP72	Adam Johnson	National Highways	It is acknowledged that planning applications for residential development identified through the PfE, Local Plan or SHLAA will be permitted. However, as highlighted within the PfE Statement of Common Ground, these sites will need to be assessed in detail and it is essential that National Highways are	<p>As part of any relevant planning application, consultation will take place with highways colleagues, Transport for Greater Manchester and other relevant statutory bodies where appropriate. A Statement of Common Ground also supports the Publication Plan.</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			closely involved in this process, particularly where there are potential impacts on the Strategic Road Network (SRN). For the PfE sites we would be keen to see masterplanning exercises developed to ensure that any mitigation requirements are considered on the cumulative impact of the allocation.	
DLP73	Richard Barton	Ashton Hale	Support the policy.	Support noted.
DLP74	Susan McKenna		Support the policy.	Support noted.
DLP75	Neil Pickering	Caseys	The references to delivering suitable housing to meet current needs and to focus on brownfield land is strongly supported but there needs to be some recognition of the viability challenges in these areas and the need for flexibility and support to achieve the outcomes.	Evidence of Oldham's housing market is set out within the Local Housing Needs Assessment (2024). A Viability Assessment (2025) has also been prepared to support the Local Plan. The policy sets out that "planning applications for residential development, in whole or as part of a mixed-use scheme, will be permitted where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies." Policy IN2 provides further policy on when site specific viability assessments may be acceptable. As such, when reading the plan as a whole, it is considered that there is sufficient flexibility to allow for site-specific viability issues to be considered as part of applications.
DLP34	Pauline Shearer	Sport England	Encourage reference to the need for development to take account of Active Design Guidance within the individual housing policies.	The housing policies should be read alongside policy D1 which considers design for new development, including active design. This is considered to be sufficient to guide decision

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				making on new development when the plan is read as a whole and so no amendments are required to any of the housing policies in this regard.
DLP67	Mr & Mrs Beesley		To promote an efficient and effective use of land there should be a presumption in favour of residential use for 'undesigned' land use. Such a policy would help secure the much-needed supply of houses and flats/apartments in the borough. Policies should encourage and allow for development of undesigned land, particularly smaller sites and those in more rural areas of the borough. Such a policy when applied to small parcels of land would encourage small builders and self-build groups and would have the potential to create a mix of housing types and tenures.	The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing (and mixed-use) development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.
DLP40	Jackie Copley	CPRE	The Standard Method is based on flawed assumptions. Using old data inflates the housing and job requirements, needlessly accelerating loss of green fields in countryside.	Oldham's housing requirement, as set out in the Local Plan, has been dealt with as part of PfE. Oldham's Local Plan is a part 2 plan to PfE. The comment is therefore not relevant to this policy.
DLP51	Rebecca Dennis	Pegasus on behalf of various landowners - Failsworth Rd, Woodhouses	Comments on the existing housing land supply and how it was not scrutinised as part of the PfE examination, questions regarding the viability and the deliverability of the supply and do not think the identified supply will meet	The reasoned justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing (and mixed-use) development where the proposed development is consistent with national planning policy and

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			housing delivery targets. Promotional material included to outline why site on Failsworth Road, Woodhouse is suitable for housing development.	guidance, PfE and other Local Plan policies. The SHLAA (2025) contains a range of documents and appendices to evidence that the land supply is suitable, available and achievable (in line with PPG). In addition, to support the Publication Plan (namely this policy) a Land Supply Evidence Document has been prepared to provide further detail on the housing land supply, and previous housing delivery (within the plan period, prior to the examination of the Publication Plan). This focuses on the five-year housing land supply (anticipated from potential adoption of the Plan) but also provides detail on the medium- and long-term supply. The Publication Plan no longer includes site allocations (policy H13 has been removed).

Table H2: Responses submitted on Policy H2 Housing Mix

In the Publication Plan this policy 'Housing Mix' has been renumbered and is now Policy H3.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	The term 'designated and non-designated heritage assets' can be simplified to heritage assets (NPPF Glossary), which would cover both.	Amendment made as suggested to Publication Plan Policy H2 Minimum Densities for Residential Development.
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistry Group	The need for a mix of house types and sizes is supported, it is important to consider a range and choice of homes to meet local needs. Whilst the policy recognises that there may be some	The policy supports a flexible approach to housing mix noting that mix should be guided by available evidence, such as the LHNA or any subsequent updates. It provides mix recommendations for all tenures (in the reasoned

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			circumstances when an alternative mix may be appropriate, this approach must be flexible. The policy does not acknowledge market location and the need to ensure viability of schemes. It is important to acknowledge that needs and demand will vary from area to area and site to site and an appropriate mix should be provided for the location and market.	justification) but sets out that alternative housing mix's may be appropriate in some circumstances (where evidenced) including where: alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs; the site has distinct characteristics that make an identified housing mix inappropriate or impracticable; the development is for specialist accommodation or there is a demonstrable need for different types of homes that cannot be delivered at a particular density; and/ or there is a need to vary existing housing mix in the locality. The circumstances listed in the policy (as above) are not exhaustive and alternative housing mixes can be agreed where necessary and evidenced.
DLP15	Anne McQueen		Support the policy.	Support noted.
DLP20	Artur Korszon		Object to the policy.	Objection noted.
DLP23	Joanne Harding	Home Builders Federation	Understand the need for a mix of house types and sizes and is generally supportive of providing a range and choice of homes to meet the needs of the local area. The policy recognises that there may be some circumstances when an alternative mix may be appropriate, however, the HBF recommends a more flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and	The policy supports a flexible approach to housing mix noting that mix should be guided by available evidence, such as the LHNA or any subsequent updates. It provides mix recommendations for all tenures (in the reasoned justification) but sets out that alternative housing mix's may be appropriate in some circumstances (where evidenced) including where: alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs; the site has distinct characteristics that

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			provides an appropriate mix for the location and market.	make an identified housing mix inappropriate or impracticable; the development is for specialist accommodation or there is a demonstrable need for different types of homes that cannot be delivered at a particular density; and/ or there is a need to vary existing housing mix in the locality. The circumstances listed in the policy (as above) are not exhaustive and alternative housing mixes can be agreed where necessary and evidenced.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Welcome and support clause 2 that identifies flood risk, landscape and ecology as factors in determining housing density.	Support noted.
DLP39	Alan Chorlton		The requirement to mix the types of homes on development sites is welcomed.	Support noted.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Encourage the removal of Table H2 from this draft policy, where the LHNA on which it is based is currently being updated, this update could be replaced during the lifespan of the Local Plan, making this policy appear out-of-date. Welcome the council's acknowledgement that "an alternative mix may be appropriate" for some developments. Departures may also be justified to compensate for the skewed nature of the housing land supply, with certain sites seemingly able to provide only smaller apartments such that larger sites should provide a greater number of larger houses, to achieve a	Since the Draft Plan policy, the policy has been reworded to make clear that the housing mix is a recommendation based on available evidence. It clarifies that, where necessary, housing mix will be updated over the lifetime of the Local Plan in line with updated local evidence. The recommended housing mix table is now set out in the reasoned justification and is based on the updated LHNA (2024). The policy supports a flexible approach to housing mix. It sets out that alternative housing mix's may be appropriate in some circumstances (where evidenced) including to meet local housing needs and where there is a need to vary existing housing mix in the locality. The circumstances

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			balance at the borough level. This should be specifically recognised in the policy as a circumstance in which an alternative mix may be appropriate (suggested text provided).	listed in the policy are not exhaustive and alternative housing mix's, can be agreed where necessary and evidenced. As such no further changes are considered necessary.
DLP52	Andrew Bradshaw	CRE8 land & Planning	Support the policy as worded and have demonstrated that the outline proposals for the land at Maltby Court will deliver a housing mix of 70% 3 bedrooms or more for both private and affordable housing on the site.	Support noted.
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Supportive of the reference to new homes being required to comply with nationally described space standards and 'accessible and adaptable' standards. It is acknowledged that new residential developments should contribute to a diverse housing mix across the borough. Within Oldham Town Centre the policy states that the housing mix shall predominantly be for apartments, which is supported by Muse. A policy which establishes a borough-wide housing mix may not meet the specific requirements of a town centre housing development, particularly as Policy H2 recognises that housing developments within the town centre will predominantly be for apartments. A greater proportion of apartments will be required in the town centre to meet demand as well as the	The policy supports a flexible approach to housing mix noting that mix should be guided by available evidence, such as the LHNA or any subsequent updates. It provides mix recommendations for all tenures (in the reasoned justification) but sets out that alternative housing mix's may be appropriate in some circumstances, where evidenced. The policy reasoned justification points to table 5.2 in the LHNA which provides a further breakdown of the recommended housing mix for each tenure by district, including for Oldham Town Centre. The reasoned justification also notes that in line with policy H2 (density), the majority of housing within Oldham Town Centre will be for apartments, ensuring an appropriate density is achieved. However, the LHNA has also identified a need for houses, including larger homes of 3 and 4 beds and that future developments should consider the existing housing mix and aim to provide a diverse

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			housing density requirements of emerging Policy H3 and PfE JP-H3. Suggest that a bespoke town centre specific housing mix policy be created, informed by appropriate evidence, that allows a greater degree of flexibility to be embedded. This will help facilitate the delivery of new high-quality homes at scale across the town centre in line with wider Local Plan objectives.	mix of house types across the town centre. It is considered that the policy provides enough flexibility in this regard.
DLP59	Chris Sinton	CBRE on behalf of Estuary Park Property Holdings Ltd - Shaw Distribution Centre (phase 2)	Proposed mix is broadly acceptable for more suburban areas, however, await the updated LHNA to inform a formal view.	Noted. An updated LHNA (2024) was published in 2025 and supports the Publication Plan.
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	Proposed mix is broadly acceptable for more suburban areas, however, await the updated LHNA before confirming support for the policy.	Noted. An updated LHNA (2024) was published in 2025 and supports the Publication Plan.
DLP73	Richard Barton	Ashton Hale	Object to the policy. This policy should accord with PfE JP-H4, which was updated through Main Modifications recommended by the Planning Inspectors. There should not be a specific requirement for apartments; rather they should be an option which could be provided where appropriate. Required housing mixes should reflect more up to date information.	Since the Draft Plan policy, the policy has been reworded to make clear that the housing mix is a recommendation based on available evidence. It clarifies that, where necessary, housing mix will be updated over the lifetime of the Local Plan in line with updated local evidence. The recommended housing mix table is now set out in the reasoned justification and is based on the updated LHNA (2024). The policy supports a flexible approach to

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				housing mix. It sets out that alternative housing mix's may be appropriate in some circumstances (where evidenced) including to meet local housing needs and where there is a need to vary existing housing mix in the locality. The circumstances listed in the policy are not exhaustive and alternative housing mix's, can be agreed where necessary and evidenced. As such no further changes are considered necessary. The policy is in line with PfE policy JP-H4.
DLP74	Susan McKenna		Support the policy, though sceptical it will be carried through.	Support noted.
DLP75	Neil Pickering	Caseys	Support the policy.	Support noted.
DLP44	Wiktora Sypnicka	Emery Planning on behalf of Chasten Holdings Ltd	A strategy based on sustaining high rates of international migration is not a sustainable response and is subject to factors beyond the council's control. The council should analyse migratory patterns and identify long-term solutions, and this is likely to involve building aspirational and family-sized housing in the right locations of the borough. Consider that the release of edge-of-settlement greenfield sites is necessary to provide the opportunity for aspirational housing and address a contracting working age population and how the borough can attract and retain families and an economically active population. This would help the council	The policy sets out the housing mix for new residential development. Comment relates to policy H1 in terms of housing requirement/ distribution. See responses to policy H1 in terms of housing land supply distribution.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			to deliver the family-sized housing set out through Draft Policy H2.	
DLP43	Wiktora Sypnicka	Emery Planning on behalf of Joe Jaskolka	A strategy based on sustaining high rates of international migration is not a sustainable response and is subject to factors beyond the council's control. The council should analyse migratory patterns and identify long-term solutions, and this is likely to involve building aspirational and family-sized housing in the right locations of the borough. Consider that the release of edge-of-settlement greenfield sites is necessary to provide the opportunity for aspirational housing and address a contracting working age population and how the borough can attract and retain families and an economically active population. This would help the council to deliver the family-sized housing set out through Draft Policy H2.	The policy sets out the housing mix for new residential development. Comment relates to policy H1 in terms of housing requirement/ distribution. See responses to policy H1 in terms of housing land supply distribution.
DLP64	Stephen Harris	Emery Planning on behalf of Mr W Lumb	A strategy based on sustaining high rates of international migration is not a sustainable response and is subject to factors beyond the council's control. The council should analyse migratory patterns and identify long-term solutions, and this is likely to involve building aspirational and family-sized	The policy sets out the housing mix for new residential development. Comment relates to policy H1 in terms of housing requirement/ distribution. See responses to policy H1 in terms of housing land supply distribution.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			housing in the right locations of the borough. Consider that the release of edge-of-settlement greenfield sites is necessary to provide the opportunity for aspirational housing and address a contracting working age population and how the borough can attract and retain families and an economically active population. This would help the council to deliver the family-sized housing set out through Draft Policy H2.	
DLP65	Stephen Harris	Emery Planning on behalf of Sheridan Group	A strategy based on sustaining high rates of international migration is not a sustainable response and is subject to factors beyond the council's control. The council should analyse migratory patterns and identify long-term solutions, and this is likely to involve building aspirational and family-sized housing in the right locations of the borough. Consider that the release of edge-of-settlement greenfield sites is necessary to provide the opportunity for aspirational housing and address a contracting working age population and how the borough can attract and retain families and an economically active population. This would help the council to deliver the family-sized housing set out through Draft Policy H2.	The policy sets out the housing mix for new residential development. Comment relates to policy H1 in terms of housing requirement/ distribution. See responses to policy H1 in terms of housing land supply distribution.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take	The housing policies should be read alongside policy D1 which considers design for new development, including active design. This is

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			account of Active Design Guidance within the individual housing policies.	considered to be sufficient to guide decision making on new development when the plan is read as a whole and so no amendments are required to any of the housing policies in this regard.
DLP70	Peter Rowlinson	Chadderton Together	Specific provision should be made for specialist residential uses in appropriate locations. Examples can be former armed forces veterans.	<p>The policy sets out general recommendations for housing mix (type, tenure (also see policy H5) and size) based on local evidence. However, the policy supports a flexible approach to housing mix. It sets out that alternative housing mix's may be appropriate in some circumstances (where evidenced) including where the development is for specialist accommodation. The circumstances listed in the policy (as above) are not exhaustive and alternative housing mixes can be agreed where necessary and evidenced.</p> <p>The Local Plan does not include site allocations. However, in line with policy H1, it does support the delivery of a diverse housing offer. Policy H4 further supports provision for specialist housing needs.</p>

Table H3: Responses submitted on Policy H3 Density of New Housing

In the Publication Plan this policy has been renumbered and is now Policy H2.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistry Group	Residential density standards should be set in accordance with the NPPF. The council must ensure appropriate flexibility is provided by this policy to allow developers to take account of the evidence in relation to site specific conditions, market aspirations, deliverability, viability and accessibility. The approach to density must also consider other policies in the plan, such as open space provision, SuDs, tree provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision. These will all impact upon the density which can be delivered at a site.	The policy is in compliance with PfE policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows). The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility in this regard to allow for the consideration of site-specific characteristics and requirements of other local plan policies.
DLP15	Anne McQueen		Support the policy.	Support noted.
DLP20	Artur Korszon		Support the policy.	Support noted.
DLP22	Dan Ingham	Russell Homes (Santec)	Welcome the recognition of a need of flexibility to account for site-specific purposes, as this is a matter that can often result in otherwise sustainable development from being brought forward. Additionally, note that the council will need to consider its approach to density in relation to other	The policy is in compliance with PfE policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			policies in the plan. Policies such as open space provision, SuDs, tree provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision will all impact upon the density which can be delivered upon a site. Flexibility within these policies would allow for a balance to be struck between often conflicting matters.	to provide for specialist housing accommodation (i.e. extra care housing, bungalows). The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility in this regard to allow for the consideration of site-specific characteristics and requirements of other local plan policies.
DLP23	Joanne Harding	Home Builders Federation	The setting of residential density standards should be undertaken in accordance with the NPPF where policies should be set to optimise the use of land. Recommend the council ensure appropriate flexibility is provided by this policy. The council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, SuDs, tree provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision will all impact upon the density which can be delivered upon a site. The policy also states that in line with PfE Policy JP-H3 the gross internal floor area of new homes will, as a minimum, meet the nationally described space standards (NDSS). Do not consider that	The policy is in compliance with PfE policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows). The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility in this regard to allow for the consideration of site-specific characteristics and requirements of other local plan policies.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			it is necessary for the policy to repeat the policies in the PfE document, however, it would be beneficial for this reminder to be kept within the justification text.	
DLP32	Martyn Walker	Lancashire Wildlife Trust	Welcome the justification that potential impacts on the wider landscape and green infrastructure could limit the density of development, although this should also reference ecology as within Policy H2.	It is considered that Green Infrastructure, as defined by NPPF, includes ecology. Moreover, the site-specific circumstances listed in the policy are provided as examples and are not an exhaustive list. Sufficient flexibility is provided in the policy to consider ecology. In this regard, the amendment is not required.
DLP43	Wiktoria Sypnicka	Emery Planning on behalf of Joe Jaskolka	It is undoubtedly the case that identifying and facilitating high-density developments within the urban areas is part of the solution to addressing unmet and future housing needs. However, the council's approach will perpetuate fundamental flaws in the housing market if it is singularly reliant upon such an approach. Consider that viable, greenfield and edge-of-settlement sites form part of a sustainable solution to meeting the borough's needs and it will not always be appropriate to apply a blanket approach to housing densities.	The policy is in compliance with PfE policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows). The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility to allow for alternative housing densities as appropriate, and therefore, does not propose a blanket approach. The approach to which sites may be considered suitable for housing is set out within Policy H1 –

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				see also table H1 for consultation issues/ responses related to this policy.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Do not oppose to the setting of density requirements for new development and as currently drafted, Policy H3 is deemed appropriate and allows sufficient flexibility on a site-by-site basis, including allowing lower densities where it can be justified.	Support noted.
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Support this policy and acknowledge the requirement in this policy to ensure that residential developments meet the nationally described space standards.	Support noted. Reference to the nationally described space standards is now set out within reasoned justification of the housing mix policy (now numbered as Policy H3), as a reminder of the requirements in PfE policy JP-H3.
DLP71	Richard Clowes	TfGM	Support the policy as it will help reduce the need to travel by car, as more people will live closer to shops, services and public transport links, enabling more active and sustainable travel.	Support noted.
DLP72	Adam Johnson	National Highways	It is noted that the policy is in line with the PfE. However, it is essential that National Highways work closely with Oldham to understand the potential cumulative impacts of smaller sites in context with the larger strategic sites. This will be of particular importance when undertaking studies to determine appropriate mitigation measures required on the SRN.	Discussions will take place as necessary as part of Duty to Cooperate. In addition, as part of any relevant planning application, consultation will take place with highways colleagues, Transport for Greater Manchester and other relevant statutory bodies (including National Highways) where appropriate. A Statement of Common Ground also supports the Publication Plan.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP73	Richard Barton	Ashton Hale	Support the policy. The caveat allowing for lower densities to be appropriate in certain circumstances is welcomed.	Support noted.
DLP74	Susan McKenna		Support the policy.	Support noted.
DLP75	Neil Pickering	Caseys	Support the policy.	Support noted.
DLP44	Wiktora Sypnicka	Emery Planning on behalf of Chasten Holdings Ltd	It is undoubtedly the case that identifying and facilitating high-density developments within the urban areas is part of the solution to addressing unmet and future housing needs. However, the council's approach will perpetuate fundamental flaws in the housing market if it is singularly reliant upon such an approach. Consider that viable, greenfield and edge-of-settlement sites form part of a sustainable solution to meeting the borough's needs and it will not always be appropriate to apply a blanket approach to housing densities.	<p>The policy is in compliance with PfE policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows).</p> <p>The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility to allow for alternative housing densities as appropriate, and therefore, does not propose a blanket approach.</p> <p>The approach to which sites may be considered suitable for housing is set out within Policy H1 – see also table H1 for consultation issues/ responses related to this policy.</p>
DLP43	Wiktora Sypnicka	Emery Planning on behalf of Joe Jaskolka	It is undoubtedly the case that identifying and facilitating high-density developments within the urban areas is part of the solution to addressing unmet and future housing needs. However,	<p>The policy is in compliance with PfE policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			the council's approach will perpetuate fundamental flaws in the housing market if it is singularly reliant upon such an approach. Consider that viable, greenfield and edge-of-settlement sites form part of a sustainable solution to meeting the borough's needs and it will not always be appropriate to apply a blanket approach to housing densities.	specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows). The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility to allow for alternative housing densities as appropriate, and therefore, does not propose a blanket approach. The approach to which sites may be considered suitable for housing is set out within Policy H1 – see also table H1 for consultation issues/ responses related to this policy.
DLP64	Stephen Harris	Emery Planning on behalf of Mr W Lumb	It is undoubtedly the case that identifying and facilitating high-density developments within the urban areas is part of the solution to addressing unmet and future housing needs. However, the council's approach will perpetuate fundamental flaws in the housing market if it is singularly reliant upon such an approach. Consider that viable, greenfield and edge-of-settlement sites form part of a sustainable solution to meeting the borough's needs and it will not always be appropriate to apply a blanket approach to housing densities.	The policy is in compliance with PfE policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows). The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility to allow for alternative housing densities as appropriate, and therefore, does not propose a blanket approach. The approach to which sites may be considered suitable for housing is set out within Policy H1 –

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				see also table H1 for consultation issues/ responses related to this policy.
DLP65	Stephen Harris	Emery Planning on behalf of Sheridan Group	It is undoubtedly the case that identifying and facilitating high-density developments within the urban areas is part of the solution to addressing unmet and future housing needs. However, the council's approach will perpetuate fundamental flaws in the housing market if it is singularly reliant upon such an approach. Consider that viable, greenfield and edge-of-settlement sites form part of a sustainable solution to meeting the borough's needs and it will not always be appropriate to apply a blanket approach to housing densities.	<p>The policy is in compliance with PfE policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows).</p> <p>The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility to allow for alternative housing densities as appropriate, and therefore, does not propose a blanket approach.</p> <p>The approach to which sites may be considered suitable for housing is set out within Policy H1 – see also table H1 for consultation issues/ responses related to this policy.</p>
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	The housing policies should be read alongside policy D1 which considers design for new development, including active design. This is considered to be sufficient to guide decision making on new development when the plan is read as a whole and so no amendments are

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				required to any of the housing policies in this regard.
DLP58	Alison Shore		General comment regarding how it is sensible to build new homes as close as possible to the Metrolink network.	The policy is in line with JP-H4, in terms of ensuring development is sustainably located.

Table H4: Responses submitted on Policy H4 Homes for Older People

The policy is now part of 'Policy H4 Providing for Local Housing Needs'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistry Group	Supportive of providing homes that are suitable to meet the needs of older people in general, the justification for this policy is unclear. Question the threshold of 150 homes and further question the need for these homes over and above the provision made by M4(2) standards. In addition, there is concern regarding the viability of providing 30 units for older people as specialist housing for older people has not been fully considered. The council should not rely only on strategic sites to meet the need for specialist accommodation to the exclusion of standalone allocations for this type of development and in particular retirement accommodation. A more proactive approach should be taken to identify and allocate specific sites for this purpose in consultation with providers of this type of development. This approach	The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older persons/ disabled persons housing has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision). The evidence base has identified that there is need for specialist accommodation for older people and. The policy reasoned justification, and this topic paper sets this out. The policy now provides a supporting role in ensuring the delivery of housing for older people and sets out requirements to ensure this provision is appropriate (i.e. it is accessible, affordable and suitable designed). Site allocations are not included within this Local Plan. However, the

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			would provide far more certainty to the council, that the need for such accommodation will be met in full.	policy would support specific sites coming forward for provision for older people and disabled people.
DLP15	Anne McQueen		Support the policy.	Support noted.
DLP20	Artur Korszon		Support the policy.	Support noted.
DLP23	Joanne Harding	Home Builders Federation	Generally supportive of providing homes that are suitable to meet the needs of older people and disabled people but concerned about the justification for this policy, clarity of this policy, the consistency of the policy and the viability of this policy. It is not clear why all developments of 150 homes or more would need to provide specific homes for older people, or what the justification is, or why the threshold is 150, and why these homes are needed over and above those provided by the provision of the M4(2) standards. The council should note the difference between homes suitable for older people (e.g., M4(2) homes or single storey homes) and specialist housing for older people (e.g. sheltered care), and the difference in need and demand for these types of homes. Concerned the viability of	The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older persons / disabled persons housing has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision). It is considered that the policy is now effective to support the delivery of housing for older people and disabled people. In addition, the requirements set out in PfE policy JP-H3 and Local Plan policy H3 (housing mix) will support the delivery of accessible and adaptable housing and level-access housing which could be suitable for older people and disabled people. The policy does not include the requirement for homes to be built to M4(3) standard (wheelchair accessible). However,

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			<p>providing 30 units for as specialist housing for older people has not been fully considered. Also consider that it is not clear what would happen on a site of more than 150 dwellings where there is not an area that meets all the principles set out in the final paragraph of the policy. If the council wishes to adopt the higher optional standards for wheelchair user homes (M4(3)) the council should only do so by applying the criteria set out in the PPG. If the council can provide the appropriate evidence and this policy is to be included, then recommend that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy. Suggest the council should not rely only on strategic sites to meet the need for specialist accommodation to the exclusion of standalone allocations for this type of development and in particular retirement accommodation.</p>	<p>the policy would support the delivery of this type of housing, in line with the need for this provision identified in the evidence base. Site allocations are not included within this Local Plan. However, the policy would support specific sites coming forward for provision for older people and disabled people.</p>
DLP39	Alan Chorlton		Policy is welcomed.	Support noted.
DLP48	Ziyad Thomas	Planning Issues on behalf of Churchill Retirement Living	Support the policy.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP49	Olivia Carr	Turleys on behalf of Northstone	<p>The policy requires a provision of homes for older people 'where there is a demonstrated local need at the time of application'. It is unclear whether this need is required to be demonstrated through subsequent planning applications or if this will be demonstrated by the council's own evidence base. The policy should be updated to clarify this and remove any ambiguity. It will also be necessary for the council to ensure the evidence base prepared to support this policy is kept up to date throughout the plan period. It is noted that the policy is dependent on the delivery of larger developments to meet the needs of the aging population. However, the housing land supply for Oldham is dominated by smaller brownfield sites within the urban area where viability is a key constraint. Therefore, until such time as more suitable, larger sites are identified for the delivery of housing in the borough this policy will not be effective in delivering the homes required for older people.</p>	<p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people 'where there is a demonstrated local need at the time of the application' has been removed. The policy also encourages early discussions with the Council through pre-application advice to discuss local housing needs.</p> <p>In any case, the policy is informed by several evidence base documents, including the Local Housing Needs Assessment and the Joint Strategic Needs Assessment, which are considered up to date at the time of publication. The evidence base for this policy will be kept up to date as appropriate over the lifetime of the plan.</p>
DLP54	Natasha Styles	The Planning Bureau on behalf of McCarthy Stone	<p>Pleased to see a separate policy intended to support the delivery of specialist housing for older people but feel that some of the wording should be removed and amended as requiring 30 homes in developments that are proposing 150 units or above (or 20%) of the site may not be realistic or</p>	<p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			deliverable. Also note the Policy H5 Homes for Disabled People also has the same requirement for Policy H4, with policy H5 appearing to be confusing specialised housing for older people and homes for disabled people and results in the policy being ambiguous contrary to paragraph 16 (d) of NPPF. Response provides details on the ageing UK population and suggests an amended policy text combining H4 and H5 to simplify the plan.	<p>which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision). The policy also encourages early discussions with the Council through pre-application advice to discuss local housing needs.</p> <p>The housing need policies have now been combined into policy H4 'Providing for Local Housing Needs'.</p>
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Supportive of the commitment to ensuring that housing choices are available for Oldham's growing older population so that they can find suitable homes with easy access to community facilities, local services and public transport, which are well integrated within the wider neighbourhood. However, as an alternative to providing a minimum of 30 units of every 150 units developed as specifically age-restricted general market housing, extra care housing, sheltered housing/assisted living or nursing or care homes across the town centre, it is suggested that the requirements for accessible homes presented in PfE Policy JP-H3 and emerging Oldham Local Plan Policy H2 could provide sufficient flexibility and adaptability to allow older people to live within wider developments in sustainable locations without the need for a specific age	<p>This is noted and the policy makes reference to the requirements in PfE policy JP-H3. Moreover, it is recognised that policy H3 (housing mix) (was policy H2 in the Draft Plan) will support the delivery of accessible and adaptable housing and level-access housing which could be suitable for older people and disabled people.</p> <p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people have been removed, however it is considered that the policy is still necessary to provide a supporting role and to ensure provision is appropriate (i.e. it is accessible, affordable and suitable designed).</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			related development to be delivered on site.	
DLP59	Chris Sinton	CBRE on behalf of Estuary Park Property Holdings Ltd - Shaw Distribution Centre (phase 2)	Broadly supportive of the commitment to ensuring that housing choices are available for Oldham's growing older population. However, as an alternative to providing a minimum of 30 units of every 150 units developed as specifically age-restricted general market housing, extra care housing, sheltered housing/assisted living or nursing or care homes across the town centre, it is suggested that the requirements for accessible homes presented in PfE Policy JP-H3 and emerging Oldham Local Plan Policy H2 could provide sufficient flexibility and adaptability to allow older people to live within wider developments in sustainable locations without the need for a specific age related development to be delivered on site.	This is noted and the policy makes reference to the requirements in PfE policy JP-H3. Moreover, it is recognised that policy H3 (housing mix) (was policy H2 in the Draft Plan) will support the delivery of accessible and adaptable housing and level-access housing which could be suitable for older people and disabled people. The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people have been removed, however it is considered that the policy is still necessary to provide a supporting role and to ensure provision is appropriate (i.e. it is accessible, affordable and suitable designed).
DLP62	Sue Skinner	Dobcross Village Community Association	The threshold used in this policy is developments of 150 homes and above. Within Saddleworth, as the number of homes built is likely to be less than 150 homes per development, suggest that a percentage provision is required for	The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older persons/ disabled persons housing has been removed. The policy continues to support the delivery of housing for older people

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			developments of say 50 homes and above. Furthermore, within this policy, the phrase '...with access to transport and local facilities' needs to be more clearly defined.	and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision).
DLP63	Lizzie Schofield	Millson Group on behalf of Stonesbreak Group	Support the identification of additional residential allocations to ensure the diverse qualitative housing needs are met in Oldham, in particular to meet the need for housing suitable for an ageing population.	Site allocations are not included within this Local Plan. However, the policy would support specific sites coming forward for provision for older people and disabled people.
DLP73	Richard Barton	Ashton Hale	Support the policy.	Support noted.
DLP74	Susan McKenna		Support the policy.	Support noted.
DLP75	Neil Pickering	Caseys	Support the policy.	Support noted.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	The housing policies should be read alongside policy D1 which considers design for new development, including active design. This is considered to be sufficient to guide decision making on new development when the plan is read as a whole and so no amendments are required to any of the housing policies in this regard.

Table H5: Responses submitted on Policy H5 Homes for Disabled People

The policy is now part of 'Policy H4 Providing for Local Housing Needs'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistry Group	The policy recognises that policies H4 and H5 overlap and suggests that suitable homes for disabled people could also include supported housing and accessible and adaptable homes. Concerns with this policy are similar to those with Policy H4, the chosen threshold of 150 homes, and further question the need for these homes over and above the provision made by M4(2) standards. The council should not rely only on strategic sites to meet the need for specialist accommodation to the exclusion of standalone allocations for this type of development and in particular retirement accommodation. A more proactive approach should be taken to identify and allocate specific sites for this purpose in consultation with providers of this type of development. This approach would provide far more certainty to the council, that the need for such accommodation will be met in full.	The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older persons/ disabled persons housing has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision). The policy also encourages early discussions with the Council through pre-application advice to discuss local housing needs. The evidence base has identified that there is need for specialist accommodation for older people and. The policy reasoned justification, and this topic paper sets this out. The policy now provides a supporting role in ensuring the delivery of housing for older people and sets out requirements to ensure this provision is appropriate (i.e. it is accessible, affordable and suitable designed). Site allocations are not included within this Local Plan. However, the policy would support specific sites coming forward for provision for older people and disabled people.
DLP15	Anne McQueen		Support the policy.	Support noted.
DLP20	Artur Korszon		Support the policy.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP23	Joanne Harding	Home Builders Federation	Policy recognises that H4 and H5 overlap and suggests that suitable homes for disabled people could also include supported housing and accessible and adaptable homes. Consider that this policy has similar issues to Policy H4. In addition, whilst it states that the requirement may be combined it is perhaps not entirely clear how it would be demonstrated that the resultant housing mix is appropriate for both groups. For example, if it is age restricted homes that are wheelchair accessible are they considered to cater for both groups or not? Recommend the council reviews this policy and works with providers of supported housing and disabled people in the community to ensure that the policy is the most appropriate way to deal with any evidenced need.	The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older persons/ disabled persons housing has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision). The policy also encourages early discussions with the Council through pre-application advice to discuss local housing needs.
DLP49	Olivia Carr	Turleys on behalf of Northstone	The policy requires a provision of homes for disabled people 'where there is a demonstrated local need at the time of application'. It is unclear whether this need is required to be demonstrated through subsequent planning applications or if this will be demonstrated by the council's own evidence base. The policy should be updated to clarify this and remove any ambiguity. It will also be necessary for the council to ensure the evidence base	<p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people 'where there is a demonstrated local need at the time of the application' has been removed. The policy also encourages early discussions with the Council through pre-application advice to discuss local housing needs.</p> <p>In any case, the policy is informed by several evidence base documents including, the Local</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			prepared to support this policy is kept up to date throughout the plan period. It is noted that the policy is dependent on the delivery of larger developments to meet the needs of the aging population. However, the housing land supply for Oldham is dominated by smaller brownfield sites within the urban area where viability is a key constraint. Therefore, until such time as more suitable, larger sites are identified for the delivery of housing in the borough this policy will not be effective in delivering the homes required for older people.	Housing Needs Assessment and the Joint Strategic Needs Assessment, which are considered up to date at the time of publication. The evidence base for this policy will be kept up to date as appropriate over the lifetime of the plan.
DLP54	Natasha Styles	The Planning Bureau on behalf of McCarthy Stone	Pleased to see a separate policy intended to support the delivery of specialist housing for older people but feel that some of the wording should be removed and amended as requiring 30 homes in developments that are proposing 150 units or above (or 20%) of the site may not be realistic or deliverable. Also note the Policy H5 Homes for Disabled People also has the same requirement for Policy H4, with Policy H5 appearing to be confusing specialised housing for older people and homes for disabled people and results in the policy being ambiguous contrary to paragraph 16 (d) of NPPF. Response then goes into detail on the ageing UK population and suggests an amended	<p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision). The policy also encourages early discussions with the Council through pre-application advice to discuss local housing needs.</p> <p>The housing need policies have now been combined into policy H4 'Providing for Local Housing Needs'.</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			policy text combining H4 and H5 to simplify the plan.	
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Supportive of the commitment to ensuring that appropriate provision of housing is available for disabled people, including people with physical disabilities, learning disabilities and mental health needs. However, as an alternative to providing a minimum of 30 units of every 150 units developed as specifically age-restricted general market housing, extra care housing, sheltered housing/assisted living or nursing or care homes across the town centre, it is suggested that the requirements for accessible homes presented in PfE Policy JP-H3 emerging Oldham Local Plan Policy H2 could provide sufficient flexibility and adaptability to allow disabled people to live within wider developments in sustainable locations.	This is noted and the policy makes reference to the requirements in PfE policy JP-H3. Moreover, it is recognised that policy H3 (housing mix) (was policy H2 in the Draft Plan) will support the delivery of accessible and adaptable housing and level-access housing which could be suitable for older people and disabled people. The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people have been removed, however it is considered that the policy is still necessary to provide a supporting role and to ensure provision is appropriate (i.e. it is accessible, affordable and suitable designed).
DLP59	Chris Sinton	CBRE on behalf of Estuary Park Property Holdings Ltd - Shaw Distribution Centre (phase 2)	Broadly supportive of the commitment to ensuring that housing choices are available for disabled people. However, as an alternative to providing a minimum of 30 units of every 150 units developed as specifically age-restricted general market housing, extra care housing, sheltered housing/assisted living or nursing or care homes across the town centre, it is suggested that the	This is noted and the policy makes reference to the requirements in PfE policy JP-H3. Moreover, it is recognised that policy H3 (housing mix) (was policy H2 in the Draft Plan) will support the delivery of accessible and adaptable housing and level-access housing which could be suitable for older people and disabled people. The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			requirements for accessible homes presented in PfE Policy JP-H3 and emerging Oldham Local Plan Policy H2 could provide sufficient flexibility and adaptability to allow older people to live within wider developments in sustainable locations without the need for a specific age related development to be delivered on site.	include units for older people/ disabled people have been removed, however it is considered that the policy is still necessary to provide a supporting role and to ensure provision is appropriate (i.e. it is accessible, affordable and suitable designed).
DLP73	Richard Barton	Ashton Hale	Support the policy.	Support noted.
DLP74	Susan McKenna		Support the policy.	Support noted.
DLP75	Neil Pickering	Caseys	Support the policy.	Support noted.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	This policy is to be read alongside D1 which considers design for new development, including active design. This is considered sufficient to guide decision making on new development when the plan is read as a whole and no amendments are required to this policy in this regard.

Table H6: Responses submitted on Policy H6 Homes for Children and Care Leavers

The policy is now part of 'Policy H4 Providing for Local Housing Needs'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP15	Anne McQueen		Support the policy, suggests the homes need to be more affordable.	Support noted. The policy supports the delivery of housing for children and care leavers where the proposed development is compliant with other policies in PfE and the Local Plan – this would include affordable housing policy H5 (which is applicable to major development). The policy wording also notes that this housing should be appropriate for the occupiers needs, which should take affordability into consideration.
DLP20	Artur Korszon		Object to the policy.	Objection noted.
DLP73	Richard Barton	Ashton Hale	Support the policy.	Support noted.
DLP74	Susan McKenna		Support the policy.	Support noted.
DLP75	Neil Pickering	Caseys	Support the policy.	Support noted.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	This policy is to be read alongside D1 which considers design for new development, including active design. This is considered sufficient to guide decision making on new development when the plan is read as a whole, and no amendments are required to this policy in this regard.

Table H7: Responses submitted on Policy H7 Affordable Homes

This policy has been renumbered as Policy H5.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP4	Hyacynth Cabiles	NHS Property Services	Suggest the council consider the need for affordable housing for NHS staff and those employed by other health and care providers and sets out reasons as to why. Housing affordability and availability can play a significant role in determining people's choices about where they work. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. Recommend engaging with local NHS, ensuring that the local need for affordable housing for NHS staff is factored into housing need and consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.	<p>The LHNA has considered the needs of key workers, including NHS staff. It sets out that affordable housing is required for this group and has noted that this should include affordable rented options, given issues of affordability in the private rented sector. The tenure mix requirements in the policy take this into account.</p> <p>The Local Plan no longer includes site allocations. However, key worker housing is supported by the Local Plan (see also policy H1).</p>
DLP15	Anne McQueen		Support the policy, rents need to be more affordable, rents are quite high in Oldham so people can't afford private	Support noted. The policy includes requirements to provide affordable housing as part of

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			rent so end up having to bid on social housing often waiting four years plus.	development, including affordable rented properties.
DLP20	Artur Korszon		Support the policy.	Support noted.
DLP23	Joanne Harding	Home Builders Federation	The Oldham LHNA 2019 identifies an annual net imbalance of 203 affordable dwellings. Support the need to address the affordable housing requirements. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. As the council has not provided a Viability Assessment it is not possible to comment on the soundness or suitability of this policy.	A Local Plan Viability Assessment has now been prepared and is available as part of the plan evidence base. The policy has been amended informed by evidence set out within the assessment and also a consideration of other relevant evidence on affordable housing need. It is considered that the policy presents a balanced approach to ensure affordable housing, which is much needed in the borough to meet local housing needs can be provided but also accounting for viability issues which are present in some areas of the borough. Further consideration of the policy approach is provided in the Housing topic paper.
DLP48	Ziyad Thomas	Planning Issues on behalf of Churchill Retirement Living	There has been no Local Plan Viability Assessment published. By limiting the opportunities for comment on a Viability Assessment the council has deviated substantially from national guidance and is not considered positively prepared, justified, effective or consistent with national policy.	A Local Plan Viability Assessment has now been prepared and is available as part of the plan evidence base. The policy has been amended informed by evidence set out within the assessment and also a consideration of other relevant evidence on affordable housing need. It is considered that the policy presents a balanced approach to ensure affordable housing, which is much needed in the borough to meet local housing needs can be provided but also accounting for

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				viability issues which are present in some areas of the borough. Further consideration of the policy approach is provided in the Housing topic paper.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Believe affordable housing requirement should be boroughwide. In relation to Table H5, the size and type of affordable housing should be left flexible, and regard should be had to local housing needs at the point of early discussion with developers on individual proposals. At the time a development is brought forward the council should advise on their preferred affordable housing mix and First Homes based on an in depth understanding and evidence base of local needs at that time. Recommend that the council amend draft Policy H7 to remove Table H4 and Table H5 to allow for an appropriate affordable housing tenure to be developed between the council and developer on a case-by-case basis, in accordance with the identified needs at the time of the application.	Given the viability and housing needs variability across the borough it is considered that a variable housing mix is most appropriate. This allows for higher levels of affordable housing to be provided where viability allows but also aims to rebalance levels of affordable housing in the borough, ensuring affordable housing is more evenly spread. The affordable housing requirements have been informed by up-to-date evidence (including the LHNA and the Viability Assessment), however policy requirements will be kept under review and updated if necessary, in line with updated evidence, over the plan period. The policy allows for alternative tenure or housing mix where the applicant can adequately evidence the need for it, considering local affordable housing needs. Any proposed alternatives will be agreed with the Council at planning application stage.
DLP54	Natasha Styles	The Planning Bureau on behalf of McCarthy Stone	It is difficult to ascertain if any of the options put forward are realistic or deliverable without an up-to-date viability study. By limiting scrutiny of the Local Plan Viability Assessment, the council is reducing the opportunities for comment on a crucial element of the evidence base that will inform policy and deliverability. The council must	A Local Plan Viability Assessment has now been prepared and is available as part of the plan evidence base. The policy has been amended informed by evidence set out within the assessment and also a consideration of other relevant evidence on affordable housing need. It is considered that the policy presents a balanced approach to ensure affordable housing, which is

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			ensure that an up-to-date viability assessment is undertaken that considers a range of typologies including older person's housing. If older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision.	much needed in the borough to meet local housing needs can be provided but also accounting for viability issues which are present in some areas of the borough. Further consideration of the policy approach is provided in the Housing topic paper. Furthermore, The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people has been removed.
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Support the commitment to delivering affordable housing alongside other tenures to ensure balanced and mixed communities. Also welcome the council's acknowledgement that in certain circumstances, such as to fulfil a funding requirement or meet an identified local need, an alternative tenure split or mix may be acceptable.	Support noted. The policy allows for alternative tenure or housing mix where the applicant can adequately evidence the need for it, considering local affordable housing needs. Any proposed alternatives will be agreed with the Council at planning application stage.
DLP63	Lizzie Schofield	Millson Group on behalf of Stonesbreak Group	Policy includes a zonal system to the application of an affordable housing requirement. The Local Housing Needs Assessment (LHNA) identifies 7.3% of the Saddleworth and Lees households as being in housing need. Across the borough, the number of households in housing need rises to 11%. The LHNA identifies an annual net affordable housing need of 203 dwellings for the period 2018/19-2022/23 – a total of 1,015 affordable dwellings. The latest AMR confirms that this figure has not	The Local Plan no longer includes site allocations. However, the policy requires affordable housing is delivered as part of major residential developments. It is considered that the policy is sufficient to help deliver affordable housing to meet local housing needs in the borough. Policy H1 considers housing requirement and delivery.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			been met in any year since 2018/19. A cumulative shortfall of 282 affordable dwellings has accrued over the five-year period (733 homes delivered). The evidenced shortfall in affordable housing delivery must be addressed as part of the emerging LPR. The allocation of additional sites which can viably deliver affordable housing is required to ensure there is a sufficient and suitable supply of affordable housing of the type and size required in the right areas.	
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	Welcome that in the exceptional circumstances there is reference to the conversion of vacant buildings including mills, but to be in line with Policy H8 it should include reference to conversion <u>or demolition</u> of vacant buildings, such as mills.	Draft Plan policy H8 Vacant Building Credit has been removed and policy around Vacant Building Credit has been added to this policy (H5). The policy now also refers to 'demolition' as suggested, in line with planning guidance.
DLP73	Richard Barton	Ashton Hale	Object to the policy. Having represented clients progressing the draft allocation at Broadbent Moss as part of PfE, much work has been undertaken in relation to viability work. The housing market in the location has its challenges and viability is a very important consideration. Given the results of the Three Dragons viability work it is surprising to see affordable requirements increase from that of current planning policy in this location. It is however noted that viability will be considered, which is welcomed.	A Local Plan Viability Assessment has now been prepared and is available as part of the plan evidence base. The policy has been amended informed by evidence set out within the assessment and also a consideration of other relevant evidence on affordable housing need. It is considered that the policy presents a balanced approach to ensure affordable housing, which is much needed in the borough to meet local housing needs can be provided but also accounting for viability issues which are present in some areas of

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				the borough. Further consideration of the policy approach is provided in the Housing topic paper
DLP74	Susan McKenna		Support the policy but would like a definition of the term "affordable".	The policy sets out that affordable housing is defined as per NPPF Annex 2 Glossary. A summary of this definition is provided in the policy reasoned justification.
DLP75	Neil Pickering	Caseys	PfE JPA14 [now JPA12] Broadbent Moss allocation is currently identified within Affordable Housing Zone 2. Unsure how the zonal definitions have been created but the area immediately to the south (Derker) has relatively high levels of affordable homes and relatively low market values. The application of the policy here could therefore adversely affect the viability of development and it does not reflect the characteristics of the location. Whilst the policy does cater for needs and viability considerations, we believe that Figure H1 should be amended to include the JPA14 land that has been removed from the Green Belt and the area to the south within Affordable Housing Zone 3.	<p>The Local Plan Viability Assessment (2025) updates the value areas identified for Oldham (to that of those set out at Draft Plan stage, based on the PfE Viability Assessment) based on evidence including market research, new-build/ second-hand achieved values, and deprivation. It is acknowledged that it is not perfect and there may be particularly high value schemes in a lower value area and vice-versa depending on particular local and site circumstances. However, it is evidenced based and logical for ease of implementation, to inform policy appropriately.</p> <p>The value areas are based on wards and so the caveats set out above apply. In any case, it is considered that policy H5 provides exceptional circumstances to consider site-specific characteristics. In addition, policy IN2 'Planning Obligations' allows for considerations of viability issues to be considered on a site-specific basis where the need for such is evidenced by a change in circumstance which could not have been</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				evident in the whole plan Viability Assessment, in line with NPPF and PPG.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	This policy is to be read alongside D1 which considers design for new development, including active design. This is considered sufficient to guide decision making on new development when the plan is read as a whole and no amendments are required to this policy in this regard.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	The grouping of wards into zones for affordable housing needs to be more appropriately assessed. Some areas of Royton, Shaw and Chadderton for example are more affluent than some areas of Saddleworth. Council currently awaits the conclusion of the Combined Authorities Task and Finish Group on affordable housing in the city region. Opportunities should be sought to redefine 'affordable' in the context of housing policymaking.	The Local Plan Viability Assessment (2025) updates the value areas identified for Oldham (to that of those set out at Draft Plan stage, based on the PfE Viability Assessment) based on evidence including market research, new-build/ second-hand achieved values, and deprivation. It is acknowledged that it is not perfect and there may be particularly high value schemes in a lower value area and vice-versa depending on particular local and site circumstances. However, it is evidenced based and logical for ease of implementation, to inform policy appropriately.

Table H8: Responses submitted on Policy H8 Vacant Building Credit

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP15	Anne McQueen		Do not support the policy.	Draft Plan policy H8 Vacant Building Credit has been removed and policy around Vacant Building Credit has been added to policy H5, in line with planning guidance.
DLP20	Artur Korszon		Support the policy.	Support noted.
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	The approach is not consistent with the NPPF and the NPPG. The introduction of a time limit means that it is not compliant with national policy and guidance.	This policy has been removed. As is set out within Policy H5, Vacant Building Credit (VBC) can be applied to reduce the affordable housing contribution where the criteria for the application of VBC is in line with the criteria set out within Planning Practice Guidance.
DLP73	Richard Barton	Ashton Hale	Support the policy.	Support noted.
DLP74	Susan McKenna		Support the policy but clarify 'built heritage'.	Support noted. Draft Plan policy H8 Vacant Building Credit has been removed and policy around Vacant Building Credit has been added to policy H5, in line with planning guidance.
DLP75	Neil Pickering	Caseys	Support the policy.	Support noted.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	This policy is to be read alongside D1 which considers design for new development, including active design. This is considered sufficient to guide decision making on new development when the

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				plan is read as a whole and no amendments are required to this policy in this regard.

Table H9: Responses submitted on Policy H9 Rural Exception Sites

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the wording of the policy at paragraph 4.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.
DLP15	Anne McQueen		Support the policy.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.
DLP20	Artur Korszon		Object to the policy as it will cause tensions in communities.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.
DLP32	Martyn Walker	Lancashire Wildlife Trust	This would necessitate the need to undertake Green Belt improvements to the remaining Green Belt commensurate to the size of removal in line with NPPF and PfE.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.
DLP39	Alan Chorlton		Policy is welcomed.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP43	Wiktorja Sypnicka	Emery Planning on behalf of Joe Jaskolka	Welcome that there is a specific policy on this issue. However, the policy arbitrarily restricts the number of units to 5. This unnecessarily restricts the potential for this policy to boost affordable housing delivery. Suggest the removal of this arbitrary cap. Point no. 3 of the draft policy refers to perpetuity although this would unnecessarily restrict the potential for discount market homes and shared ownership homes, and the potential to staircase to 100% ownership. This element should be removed. The policy also says units will be afforded to those on the affordable housing waiting list, although this is not necessary as any affordable unit will instead need to meet occupancy criteria agreed with the council. The policy should reflect the definition in the NPPF and allow for a proportion of market homes to be allowed on the site in certain instances.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.
DLP73	Richard Barton	Ashton Hale	Support the policy.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.
DLP74	Susan McKenna		Object to the policy.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP75	Neil Pickering	Caseys	Support the policy.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	This policy has been removed. Rural exceptions sites may still come forward where appropriate in line with the criteria set out in National Planning Policy.

Table H10: Responses submitted on Policy H10 Houses in Multiple Occupation (HMOs)

This policy has been renumbered as Policy H6.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP15	Anne McQueen		There are too many HMOs already.	Noted. The comment does not relate to the content of the policy.
DLP20	Artur Korszon		Support the policy.	Support noted.
DLP73	Richard Barton	Ashton Hale	Support the policy.	Support noted.
DLP74	Susan McKenna		Support the policy but need to define HMO.	Support the policy. HMOs are defined in the policy reasoned justification.
DLP75	Neil Pickering	Caseys	Support the policy.	Support noted.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	This policy is to be read alongside D1 which considers design for new development, including active design. This is considered sufficient to guide decision making on new development when the

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				plan is read as a whole, and no amendments are required to this policy in this regard.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	With the increase in HMO developments, it is key to ensure that current larger residential properties are not utilised above unused property that is likely to fall into disrepair. To ensure all HMO's follow minimum recommended specifications the licensing process in Oldham needs to be fit for purpose. Parking also needs to be addressed as majority of people living in these types of property are cars owners.	The policy sets out several criteria to ensure the appropriate development of HMOs, including where the proposed development does not result in the loss of, or impact on the character or amenity to the area as a consequence of increased traffic, noise or general disturbance; and where it complies with the relevant design and amenity standards as outlined in policy D1, and any existing or future HMO standards or guidance developed by the Council.

Table H11: Responses submitted on Policy H11 Custom / Self-Build and Community-led Housing

This policy has been removed.

Id No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistry Group	The council's evidence base for Custom and Self Build demand is currently unclear. Question whether the council has appropriate evidence to support the requirement for developers on sites of 50 dwellings or more to provide 2% of all new homes as plots for custom or self-build housing. This policy as currently proposed will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The council's evidence does not show that there is a demand from custom and self-builders to live on sites within a larger residential development scheme.	This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP15	Anne McQueen		Support the policy.	This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP20	Artur Korszon		Support the policy.	This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.

Id No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP23	Joanne Harding	Home Builders Federation	<p>Keen to understand the evidence to support the need for custom and self-build housing in Oldham, and how it has informed the requirements of this policy. The PPG sets out how custom and self-build housing needs can be assessed. The LHNA sets out that there were 184 individuals on the council's self-build register, 30 of whom had registered in the past year. It sets out the most popular locations are Saddleworth and Lees. Do not consider the council has appropriate evidence to support the requirement for developers on sites of 50 dwellings or more to provide 2% of all new homes as plots for custom or self-build housing. The policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. PPG sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. Including supporting neighbourhood planning groups to include sites in their plans, effective joint working, using council owned land and working with Homes England.</p>	<p>This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.</p>
DLP39	Alan Chorlton		Policy is welcomed.	<p>This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.</p>

Id No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP61	Andrew Leysens	United Utilities	Recommend this policy includes provision to ensure that any custom / self-build site is underpinned by a site-wide strategy for infrastructure provision. Suggested wording for the policy included.	This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP73	Richard Barton	Ashton Hale	Support the policy.	This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP74	Susan McKenna		Support the policy.	This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP75	Neil Pickering	Caseys	Support the policy.	This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	This policy has been removed. Proposals for Self-Build and Custom Housebuilding are supported through policy H3 and where they are compliant with relevant national planning policies, PfE and other Local Plan policies.

Table H12: Responses submitted on Policy H12 Gypsies, Travellers and Travelling Showpeople

This policy has been renumbered as Policy H7.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy.	Support noted.
DLP15	Anne McQueen		Support the policy.	Support noted.
DLP20	Artur Korszon		Object to the policy.	Objection noted.
DLP73	Richard Barton	Ashton Hale	Support the policy.	Support noted.
DLP74	Susan McKenna		Support the policy.	Support noted.
DLP75	Neil Pickering	Caseys	Support the policy.	Support noted.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	This policy is to be read alongside D1 which considers design for new development, including active design. This is considered sufficient to guide decision making on new development when the plan is read as a whole, and no amendments are required to this policy in this regard.

Table H13: Responses submitted on Policy H13 Housing and Mixed-Use Allocations

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	In order to prove that an allocation of a site is not incompatible with the requirements of the NPPF, an assessment of the significance and any impacts associated with them would be required. This is normally done through a Screening Exercise to define which sites need a Heritage Impact Assessment. Response also states that under the 1990 Act, that "special regard" should be had to the preserving of Listed Buildings or their setting. Response goes on to say that an assessment also needs to be taken as to whether any proposed sites have any impact on the significance of a Conservation Area. If any harm is identified, then the site should not be identified. Furthermore, in relation to density, the response states that although the Local Plan sets out the minimum density and site capacity for each site, there is no evidence to support this. Comments regarding specific sites are listed.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	No comments on any of the proposed allocated sites but suggest that the plan allocates more sites than required to meet the housing requirement as a buffer. This	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.	use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary. The Housing Topic Paper provides further detail on the housing land supply.
DLP14	Zoe Haystead	Natural England	Recommends that wording within this policy outlines specific allocations which will require a project level Habitats Regulations Assessment (HRA) in line with mitigation required to prevent adverse effects to Rochdale Canal Special Area of Conservation (SAC), the allocations this relates to were listed. In addition, the policy should clearly outline the specific allocations within 7km of The South Pennine Moors SAC and the South Pennine Moors Phase 2 Special Protection Area (SPA) to reflect the mitigation required within the Draft Oldham Local Plan HRA. Allocations within 7km of the SAC and SPAs should provide or contribute towards the provision of greenspace as an alternative to visiting the South Pennine Moors and contribute towards the implementation of a Strategic Access, Monitoring and Management Strategy. This should be clearly reflected in the wording of Policy H13. Suggest the mitigation is linked with Policy TM1 Tourism and Policy N3 Enhancing Green Infrastructure through Development.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP15	Anne McQueen		Object to the policy.	The Publication Plan no longer includes site allocations (policy H13 has been removed).
DLP20	Artur Korszon		Object to the policy.	The Publication Plan no longer includes site allocations (policy H13 has been removed).
DLP23	Joanne Harding	Home Builders Federation	No comments on the individual proposed housing allocations and these representations are submitted without prejudice to any comments made by other parties. Keen the council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary. The Housing Topic Paper provides further detail on the housing land supply.
DLP46	Matthew Sobic	Savills on behalf of Brookhouse	Request that in further drafting Policy H13 a recognition is placed in the policy that Southlink Phase 2 (and any other relevant allocations) would be required to provide mitigation under the terms of the Agent of Change policy requirement set out at Policy LE1, to ensure a residential proposal did not have an impact on the operation of an existing commercial location. By that we mean, noise and light sensitive uses are not proposed in affected range of the Retail Park, its service yards, roads and car parking in any way that would compromise the operation of the Retail Park and its use by customers. Both emerging LE1 and Paragraph 193 of the National Planning	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			Policy Framework are clear that it is the applicant of the Agent of Change that will need to provide the mitigation.	
DLP11	Simon Tucker	Canals and River Trust	Specific comments regarding allocations that are in close proximity to either the Rochdale Canal or the Huddersfield Narrow Canal and requests made that any future development does not impact upon the setting or the ecology of the canals.	The Publication Plan no longer includes site allocations (policy H13 has been removed).
DLP47	Nick Redfearn	Amber Industries Ltd	Comments regarding the number of jobs currently on Southlink and asks where will all those jobs and companies go if the Business Park is to be redeveloped for housing.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Comments submitted on some allocations in relation to the ecology, habitats and wildlife present, with suggestions on how they should be protected.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP22	Dan Ingham	Russell Homes (Santec)	Comments on Knowls Lane allocation, welcomes the proposed allocation but the	The Publication Plan no longer includes site allocations (policy H13 has been removed).

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			site boundary should be consistent with the planning application boundary. Highlights errors in the site proforma.	This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Believe further sites should be allocated in the plan. The allocation of land at Hanging Chadder would represent a sustainable and deliverable response to this, able to provide a significant quantum of high-quality family housing.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP52	Andrew Bradshaw	CRE8 land & Planning	Concerned that despite the technical and environmental assessment of the proposed housing and mixed use allocated sites the lack of any robust assessment of the sites against the statutory biodiversity net gain requirements is a serious omission that could result in several sites being undevelopable or unviable. The same can be said in relation to the wider housing land supply identified the SHLAA.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary. The Housing Topic Paper provides further detail on the housing land supply.
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Recognise and support the identification within Policy H13 that several sites in the town centre are proposed to be allocated for housing, in whole or as part of a mixed-use scheme.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP59	Chris Sinton	CBRE on behalf of Estuary Park Property Holdings Ltd - Shaw Distribution Centre (phase 2)	Support the allocation of Shaw Distribution Centre. Committed to delivering phase 2 of the development.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP61	Andrew Leyssens	United Utilities	Request that the site proformas or any future site-specific policy is updated to reflect the issues regarding UU assets being present on some sites, potential allocations with any UU assets present were listed. It is critical that these site constraints are reflected in the Local Plan, preferably in site-specific policy. Note paragraph 8.94 which sets out an intention to prepare site-specific policy for allocated sites at the Publication Plan. Supportive of the reference in paragraph 8.94 to the need for a detailed masterplan and infrastructure phasing delivery strategy. This should be reflected in future Local Plan policy.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP63	Lizzie Schofield	Millson Group on behalf of Stonesbreak Group	Detailed comments around LHNA, SHLAA and housing land supply and states that there is insufficient evidence available at this stage to demonstrate the sites identified in the SHLAA are suitable,	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			available or developable. Proposes that land at Springhead Quarry as being a site that can meet the needs of the borough.	provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary. The Housing Topic Paper provides further detail (and evidence) on the housing land supply.
DLP71	Richard Clowes	TfGM	Supports the policy particularly for Oldham Town Centre as this will help to deliver more sustainable communities and reduce the need to travel by car.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP72	Adam Johnson	National Highways	Welcomed that there is a particular focus for residential development to be contained in Oldham Town Centre, which promotes sustainable travel and active travel modes rather than being reliant on the private car. It is acknowledged that, subject to the scale and location of a particular site, allocations may require site specific documents including an infrastructure delivery strategy and detailed green infrastructure. Developers bringing forward any sites located close to the SRN should involve National Highways at the earliest possible opportunity. The policy could provide more detail on transport related matters, and it is essential that National Highways are involved with the any SRN intervention required for development, for example	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			cluster sites such as Stakehill and Hollinwood. It is noted that some site allocations are already in the planning system and further emphasises that National Highways are consulted.	
DLP73	Richard Barton	Ashton Hale	Support the policy.	The Publication Plan no longer includes site allocations (policy H13 has been removed).
DLP74	Susan McKenna		Support the policy. Homes are desperately needed but so are schools and health providers for the residents of the homes.	The Publication Plan no longer includes site allocations (policy H13 has been removed).
DLP75	Neil Pickering	Caseys	Support the policy. The references to delivering suitable housing to meet current needs and to focus on brownfield land is strongly supported but there needs to be some recognition of the viability challenges in these areas and the need for flexibility and support to achieve the outcomes.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary. Policy IN2 sets out policy around viability.
DLP24	Mr D Jones	Marc Hourigan (Hourigan Planning)	Object to this policy as insufficient housing land has been identified to meet the needs of the area up to 2039 this policy and the council's SHLAA. Also, object to the allocation of land to the south of Ashton Road, Woodhouses under this policy and outlines reasons why, including highway safety and the impact on the conservation area. More plan led sites need to be	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			identified for housing including site north of Aston Road, Woodhouses.	The Housing Topic Paper provides further detail (and evidence) on the housing land supply.
DLP34	Pauline Shearer	Sport England	Encourage the policy wording to include the need for development to take account of Active Design Guidance within the individual housing policies.	The Publication Plan no longer includes site allocations (policy H13 has been removed). The housing policies should be read alongside policy D1 which considers design for new development, including active design. This is considered to be sufficient to guide decision making on new development when the plan is read as a whole and so no amendments are required to any of the housing policies in this regard.
DLP42	Nick Reeves	Kirklees Council	Note that there are several allocations proposed for the area around Diggle which is close to the boundary with Kirklees and so long as they do not have any adverse impacts on Kirklees e.g., highways, do not feel it is necessary to comment on them.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP39	Alan Chorlton		Concerned with the town centre concentration of homes. The Local Plan is favouring high-density developments such as apartments within the centres rather than a more even spread of development sites across the borough. This will reduce the choice of homes for people. It is also likely to widen the gap between house prices in areas in the borough. PfE identified large strategic sites in the Green Belt that are likely to be under the control of volume house builders. The Local Plan	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			needs to identify some small and medium suburban and rural sites.	
DLP29	Tracey Simm		Supports inclusion of the site at Ripponden Road in Denshaw thinks the site boundary could be increased as the rail and road links are good and there is additional land coming to the market shortly.	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP2	Andrew Barlow		Objects to Saddleworth School site. Part of the site is Green Belt and was only available for educational purposes. Building within the existing brownfield part of the old school is inevitable, however the type of housing and who it is for is another question altogether and whether Uppermill has the correct infrastructure, doctors, dentists, available education places for another 100 houses is another discussion altogether.	The Publication Plan no longer includes site allocations (policy H13 has been removed).
DLP77	Mrs J A Hill		Comments on the proposed Civic Centre allocation - proposals to demolish the Council Chambers and QE Hall are baffling and disheartening. Their potential to be repurposed should not be underestimated. They are of cultural and architectural significance.	The Publication Plan no longer includes site allocations (policy H13 has been removed).
DLP57	Julie Ball		Good use of brownfield sites and the town centre for housing.	The Publication Plan no longer includes site allocations (policy H13 has been removed).

7. Responses submitted on the Economy and Employment Policies

Table E1: Responses submitted on Policy E1 Business and Employment Areas

In the Publication Plan this policy has been renumbered and is now Policy E2.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	Recommend that the 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.
DLP56	Jon Power	Asteer Planning on behalf of Saddleworth Property Partnership (SSP)	Would like to make the council aware of the poor economic performance and viability challenges of Saddleworth Business Centre, which forms a small part of the Valley Mills employment area, and to request that the council considers de-designating this area of BEA 21 for employment uses and consider its allocation for residential development. The site does not meet the objectives of this policy. Response goes into further detail regarding the performance and issues with the site in its current employment use.	Comment noted. 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.
DLP61	Andrew Leyssens	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.	Comment noted. 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.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP70	Peter Rowlinson	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 Lane has also been removed from the BEA.
DLP71	Richard Clowes	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.
DLP72	Adam Johnson	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. Request access to the shapefile of BEA sites so it can be	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.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			reviewed alongside the PfE allocations and SHLAA sites to understand the cluster of sites that may impact the SRN.	
DLP3	Emily Hycran	Historic England	The introduction (paragraphs 9.1 - 9.5) would benefit from mention of the mills work undertaken.	Comment noted and Oldham Mills Strategy now including in introductory text.
DLP57	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.

Table E2: Responses submitted on Policy E2 Exceptions within Business and Employment Areas and other existing employment sites

In the Publication Plan this policy has now been split in two and is now Policy E3 'Exceptions within Business and Employment Areas' and Policy E4 'Employment sites outside of Business and Employment Areas'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP39	Alan Chorlton		Policy is welcomed.	Support noted.
DLP72	Adam Johnson	National Highways	It is noted that non-employment uses may be permitted outside of BEAs. These sites will need to be assessed in detail and it is essential that National Highways are consulted on any potential impact applied to the SRN because of development.	Comment noted. 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.

Table E3: Responses submitted on Policy E3 Reuse and redevelopment of Mill Buildings

In the Publication Plan this policy has been renumbered and is now Policy E5.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the content of the policy. Welcome the wording of para 9.13 - 9.14 and the reference to the Oldham Mills Strategy. The plan would benefit from this reference in other parts.	Support noted.
DLP11	Simon Tucker	Canals and River Trust	Concern that the second part of the policy text, specifically requirements for applicants to undertake viability exercises, could present a challenge for applicants preserving mill assets to be approved; as it is not clear on the amount of evidence required for a viability exercise. In addition, some viability exercises can require significant investment in the use of external consultants and financial modelling which could themselves increase development costs and make re-use of mill buildings less viable. Council may wish to consider the addition of 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 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 the 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.
DLP39	Alan Chorlton		Policy is welcomed.	Support noted.
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	There should be no reference to the Mills Strategy unless and until a further update to the Mills	The Mills Strategy forms part of the evidence base for the Local Plan and was commissioned jointly with Historic

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			Strategy is completed in order to address concerns with Policy HE4.	England. There was a targeted consultation as part of the Mills Strategy preparation and, as such, it is considered a sound evidence base.

Table E4: Responses submitted on Policy E4 Office, Industry and Warehousing Allocations

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	In order to demonstrate that an allocation of a site is not incompatible with the requirements of the NPPF, an assessment is needed of what contribution they (designated heritage assets and conservation areas) make to the elements which contribute to the significance of any heritage assets and what effect the loss of this site and its subsequent development might have upon their significance. This is usually a screening exercise, which demonstrates which sites need a Heritage Impact Assessment and those that don't. In accordance with the 1990 Act, "special regard" should also be had to the preserving of Listed Buildings or their setting. Whilst this relates to the determination of a planning application, consideration to this also needs to be given to this as part of preparing the Local Plan. If the conclusion is reached that the development would still be likely to harm elements contributing to the significance of the Conservation Area and any designated heritage asset, then the site should not be allocated unless there are clear public	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).	
DLP41	Brian O'Connor	Lichfields on behalf of Russell LPD	Given the significance of the Stakehill Industrial Estate extension in meeting the borough's industrial and warehousing needs the policy should be updated to make explicit reference to it. Table E3 should also be expanded to include a breakdown of the contribution of JPA2 to Oldham's industrial and warehousing supply.	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.
DLP61	Andrew Leyssens	United Utilities	Request that the site proformas or any future site-specific policy is updated to reflect the issues regarding UU assets being present on some sites, potential allocations with any UU assets present were listed. It is critical that these site constraints are reflected in the Local Plan, preferably in site-specific policy. This should be reflected in future Local Plan policy. In this regard we note paragraph 9.23 which sets out an intention to prepare site-specific policy for allocated sites at the Publication Plan. For consistency with paragraph 8.94 relating to housing and mixed-use allocations, request that paragraph 9.23 also references the need for a detailed masterplan and	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			infrastructure phasing delivery strategy for the employment allocations. This should be reflected in future Local Plan policy. Recommend wording to introduce the agent of change principle into the draft Local Plan.	
DLP32	Martyn Walker	Lancashire Wildlife Trust	Comments submitted on some allocations in relation to the ecology, habitats and wildlife present, with suggestions on how they should be protected.	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.
DLP72	Adam Johnson	National Highways	It is acknowledged that strategic allocations involving protected land are identified through PfE. However, these sites will need to be assessed in detail to form the Local Plan transport evidence base. Also, Oldham should confirm within the Plan that these areas are located within BEAs and are included in the assessment. It is essential that National Highways are closely involved in this process, particularly where there are potential impacts on the SRN.	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.
DLP14	Zoe Haystead	Natural England	Recommend certain allocations (details of which ones provided) within the Local Plan Proformas for Industry and Warehousing Allocations will require a project level HRA which considers implications to hydrology.	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.
DLP27	Dan Ingham	Elswood Family (Santec)	Representation relates to land proposed to be allocated for employment at Foxdenton Lane. The landowners object to the site being designated for employment and believe the site could deliver a high-quality residential scheme residential.	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.
DLP38	Joshua Ambrus	Rapleys on behalf of Lidl	Comments relate to the site at Albert Street, Hollinwood, in which Lidl have an interest. The site has benefitted from planning permission for the demolition of a gasholder and outline planning consent for an employment-led mixed-use scheme, approved by Oldham Council in 2013. Lidl are now progressing a planning application for a new foodstore at part of the site. The allocation, as currently drafted, therefore, does not align with the type or form of development being brought forward. The site is therefore not currently deliverable for the uses identified within the proposed allocation. This is vital in considering whether the allocation can be deemed sound. This part of the allocation for Land at Albert Street should not and cannot be adopted in its current form. The part of the site	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			that Lidl has an interested in should therefore, be omitted from the employment allocation proposed.	
DLP70	Peter Rowlinson	Chadderton Together	Consider the allocation of land off Foxdenton Lane for employment to be 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. Chadderton Together has secured an approval to apply for £2.2m from Heritage Lottery for the restoration of Foxdenton Hall and Park. The allocation of the adjoining land for employment will create an inappropriate environment for the hall and park.	The Publication Plan no longer includes site allocations (policy E4 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary.

8. Responses submitted on the Tourism Policies

Table TM1: Responses submitted on Policy TM1 Tourism

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP11	Simon Tucker	Canals and River Trust	Parts 7 and 8 of this policy identify the potential opportunities available to promote Green Infrastructure (GI) assets, including specific reference to the canal corridors, and improvements to access to GI corridors. Agree that reference to our canals, and the wider GI network, is appropriate for this policy. It could also make the Local Plan more effective in meeting the overall aims of paragraph 20 of the NPPF, which sees to ensure that policy seeks to conserve and enhance green infrastructure assets.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP14	Zoe Haystead	Natural England	Residential allocations within 7km of The South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA are likely to cause recreational pressure. New development within this radius should provide or contribute towards the provision of greenspace as an alternative to visiting the South Pennine Moors and contribute towards the implementation of a Strategic Access, Monitoring and Management Strategy. This is reflected within PfE Policies JP-	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies. Natural England's position statement is set out in the Appendix of the South Pennine Moors SAC/ SPAs Joint SPD. This confirms there is

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			G9 Enhancement of Biodiversity and Geodiversity and JP-G5 Uplands.	currently no ecology evidence to show impact on conservation of the South Pennines SAC/SPAs from recreational disturbance.
DLP18	Anita Lowe		Comments that the nighttime economy is very poor, with pubs and bars are closing down and Yorkshire Street is overrun with take-aways. Nighttime economy cannot thrive alone with chicken shops/ take-aways. Yorkshire Street would be much improved if it was traffic zone free and no buses.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP21	Zoe Hutton		Support the policy. Would like to see more independent and artisan businesses in Oldham and the Tourist Information office with the archives at Spindles rather than the library where it is now. In addition, a bus going via Dove Stones to Holmfirth to help with congestion.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Agree and support the benefits GI provides in increasing tourism within Oldham, the proposal should include protective measures to ensure that there is no undue disturbance to sensitive landscapes / habitats or species.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP33	Sarah Welsh	Peak District National Park	Tourism, it is important that in promoting access to 'Key landscapes within Saddleworth,' it can be by public transport or active travel from within Oldham borough.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP39	Alan Chorlton		Policy is welcomed, but suggests that holiday accommodation should be added in.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP42	Nick Reeves	Kirklees Council	Support the policies that will protect, enhance and promote the Huddersfield Narrow Canal along its full course.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP72	Adam Johnson	National Highways	It is welcomed that the policy will seek to promote the use of Green Infrastructure in the borough for inbound tourism. However, there is no further reference to accessing tourist destinations by sustainable transport and active travel modes, which reduces pressure on the SRN. The policy should pay due consideration to visitor pressure on sites designated for nature or geological conservation and it is important that visitor pressures on the SRN are considered.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP57	Julie Ball		Good to make use of Saddleworth as mentioned.	This policy has been removed. Proposals for tourism related development will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.

Table TM2: Responses submitted on Policy TM2 Farm Diversification

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP18	Anita Lowe		Support the policy.	This policy has been removed. Proposals for development in relation to farm diversification will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP21	Zoe Hutton		Support the policy as long as the environmental aspects and Green Belt are considered.	This policy has been removed. Proposals for development in relation to farm diversification will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Welcome the commitment to protect biodiversity from potential adverse impacts of farm diversification. The policy could refer to the upcoming ELMS funding from Defra to help farms provide multiple benefits to wildlife and people through nature-based solutions. Adverse impacts could come not only from loss of habitat but increased disturbance to sensitive habitats and species. The policy could also refer to the potential biodiversity and climate change benefits of promoting wetter farming and paludiculture farming practices, especially important in relation to peat soils.	This policy has been removed. Proposals for development in relation to farm diversification will be supported where they are compliant with relevant national planning policies, PfE and other Local Plan policies.
DLP39	Alan Chorlton		Policy is welcomed, but suggests that holiday accommodation should be added in.	This policy has been removed. Proposals for development in relation to farm diversification will be supported where they are compliant with relevant

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				national planning policies, PfE and other Local Plan policies.

9. Responses submitted on the Our Centres Policies

Table C1: Responses submitted on Policy C1 Our Centres

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support this policy.	Support noted.
DLP16	Sally Hulse		Support the policy. Need to ensure our centres do not turn into boarded up / take away heavy areas, we need a mix of businesses for residents and visitors, must try to encourage a mixture of new business and community uses to promote the area and bring more people in, helping employment for locals.	Support noted. The Publication Local Plan provides a positive approach to the growth and management of our centres and measures have been included for maintaining the vitality and viability of our centres.
DLP46	Matthew Sobic	Savills on behalf of Brookhouse	Request that the council amend the existing Oldham Town Centre boundary to extend it south to include Alexandra Retail Park. The Retail Park is located approximately 100m from the existing boundary and serves the users of the town centre, residential areas of the town centre and immediate southern suburbs providing valuable community convenience and everyday focused retail services for residents in the town centre and immediate surrounding suburbs and importantly provides a wide range of employment opportunities for local residents. Given the objective set out in the emerging Local Plan to support local physical retail, identifying the Retail Park as part of the town centre will enable it to better support that retail function as well as acknowledging the important role that it plays as an urban, modern retail destination serving the town centre and its immediate areas as well supporting employment within physical retail.	Comment noted. However, it is considered that Alexandra Retail Park performs more of an 'edge-of centre' function. The boundary for Oldham Town Centre has instead been amended to reflect the Building a Better Oldham programme which is a positive strategy for Oldham Town Centre. This does not include Alexandra Retail Park.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP46	Matthew Sobic	Savills on behalf of Brookhouse	Policy provides sufficient policy support and flexibility for Failsworth Centre.	Comment noted.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as it enables individual centres to become self-sufficient and rely less on longer distance travel for general purposes. In providing less reason to travel greater distances by private vehicle, this policy should contribute significantly to a reduction in trips on the SRN.	Support noted.
DLP69	Matthew Sobic	Savills on behalf of Asda	Asda in Shaw should form part of Shaw Centre given the importance it was given in the Retail and Leisure Study. Its omission does not reflect the role, function and location of the Asda Superstore to Shaw Centre. Reasons provided regarding the importance of the store.	Comment noted. The boundary of the centre of Shaw has been assessed and amended to incorporate Asda in the Publication Local Plan.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	District Centres are falling into disrepair and can offer very little to their residents, they need to be revitalised, alongside Oldham Town Centre with the provision of community services in mind. Currently all available money is being spent in Oldham Town Centre which will not meet the needs of many residents. Family hubs should be made available in all districts.	Comment noted. The Publication Local Plan provides a positive approach to the growth and management of our centres and measures have been included for maintaining the vitality and viability of our centres.
DLP71	Richard Clowes	TfGM	Support the policy as it will reduce the need to travel by car.	Support noted.

Table C2: Responses submitted on Policy C2 Local Services and Facilities

In the Publication Plan this policy has been renumbered and is now Policy C4.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP16	Sally Hulse		Support the policy. Need to ensure our centres do not turn into boarded up / take away heavy areas, we need a mix of businesses for residents and visitors, must try to encourage a mixture of new business and community uses to promote the area and bring more people in, helping employment for locals.	Support noted. The Publication Local Plan provides a positive approach to the growth and management of our centres and measures have been included for maintaining the vitality and viability of our centres.
DLP46	Matthew Sobic	Savills on behalf of Brookhouse	Policy provides sufficient policy support and flexibility for Failsworth Centre.	Comment noted.
DLP71	Richard Clowes	TfGM	Support the policy as it will reduce the need to travel by car.	Support noted.
DLP57	Julie Ball		More detail needed on how each centre will be developed. Royton has a good vibrant centre with its market, shops, restaurants and bars. How can this model be used other centres.	Comment noted. The Publication Local Plan provides a positive approach to the growth and management of our centres and measures have been included for maintaining the vitality and viability of our centres.

Table C3: Responses submitted on Policy C3 Retail and Leisure Impact Assessments and Sequential Tests

In the Publication Plan this policy has been renamed and is now Policy C2 'Protecting the vitality of our centres'

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP16	Sally Hulse		Support the policy. Need to ensure our centres do not turn into boarded up/ take away heavy areas, we need a mix of businesses for residents and visitors, must try to encourage a mixture of new	Support noted. The Publication Local Plan provides a positive approach to the growth and management of our centres and measures have been included for

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			business and community uses to promote the area and bring more people in, thus helping employment for locals.	maintaining the vitality and viability of our centres.
DLP46	Matthew Sobic	Savills on behalf of Brookhouse	The wording of the Policy is drafted in a way that any proposal exceeding 300 sqm and not located within a centre would be subject to the impact assessment as any proposal outside of those centres listed would be caught by the requirement to assess impact on those centres. That is not evidenced by the evidence base that is suggested to support Policy C3, namely the Oldham Retail & Leisure Study. If the council proceed with the policy requirement, and we consider that there is not sufficient evidence to do so, a qualification to the policy would be required to determine when the impact assessment on District Centres would be required. The policy objective to introduce a lower than nationally set threshold for assessing impact does not meet its intended objectives and is not supported by evidence. A blanket reduction in the threshold to 1,500 sqm for proposals close to Oldham town centre would serve no purpose other than to add barriers to the delivery of physical retail development that is appropriate within the Oldham area and serves a valuable community facility both in terms of retail provision and employment generation. In terms of District Centres, a reduction to 300 sqm is not justified. There is no evidence provided in the Retail & Leisure Study, quantitative or qualitative, which indicates that such harm could be reasonably expected to occur.	Comment noted. The policy has incorporated recommendations from the Retail and Leisure Study 2020 which concluded that given the vacancy rates and how vulnerable our centres are to market changes a lower threshold should be applied. This is considered an appropriate measure for maintaining the vitality and viability of our centres.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP71	Richard Clowes	TfGM	Support the policy as it will reduce the need to travel by car.	Support noted.

Table C4: Responses submitted on Policy C4 Changes of use and redevelopment within the borough's centres

In the Publication Plan this policy has been renumbered and is now Policy C3.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP16	Sally Hulse		Support the policy. Need to ensure our centres do not turn into boarded up / take away heavy areas, we need a mix of businesses for residents and visitors, must try to encourage a mixture of new business and community uses to promote the area and bring more people in, helping employment for locals.	Support noted. The Publication Local Plan provides a positive approach to the growth and management of our centres and measures have been included for maintaining the vitality and viability of our centres.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as it enables individual centres to support local residents to rely less on longer distance travel for general purposes. In providing less reason to travel greater distances by private vehicle, this policy should contribute significantly to a reduction in trips on the SRN.	Support noted.
DLP71	Richard Clowes	TfGM	Support the policy as it will reduce the need to travel by car.	Support noted.

10. Responses submitted on the Oldham Town Centre Policies

Table OTC1: Responses submitted on Policy OTC1 Oldham Town Centre

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support this policy. Paragraph 12.10 of the supporting text should mention listed buildings. Paragraph 12.14 mentions important views in the Town Centre, clarification is sought as to whether this is referring to those established in the Oldham Town Centre Conservation Area Appraisal Management Plan (CAAMP). If so, this should be referenced and included in the evidence base. If there is no evidence, then this needs to be commissioned.	Support noted. Paragraph 11.10 (what was 12.10) has been amended to reference listed buildings in the final sentence. Paragraph 11.14 (what was 12.14) has been amended to reference the Oldham Town Centre Conservation Area Appraisal and Management Plan Supplementary Planning Document.
DLP17	Charlotte Lister		Object to the policy. The Oldham Coliseum theatre should be renovated and reopened, this would be much cheaper than building the new unsuitable tiny theatre for £24million, and better for the environment, it would improve the nighttime economy on Yorkshire Street, and it would preserve this heritage asset.	Comment noted. Though not within the scope of the Local Plan it is worth noting that Oldham Coliseum is currently undergoing renovation and is due to re-open in 2026.
DLP19	April Martin		Support the policy, renovate the Coliseum theatre - rather than building a new theatre.	Support noted. Though not within the scope of the Local Plan it is worth noting that Oldham Coliseum is currently undergoing renovation and is due to re-open in 2026.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support and welcome the inclusion of principle 3 to create a greener, cooler and biodiverse own centre. It is very important that urban areas	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			support biodiversity and do not present a barrier to the flow of wildlife across the urban landscape.	
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	This policy establishes the council's commitment to support the continued enhancement, redevelopment and regeneration of Oldham Town Centre and is welcomed. The policy recognises that new homes will be supported by complementary uses at ground floor level, including social infrastructure. The policy also establishes town centre principles, which will guide future development in the town centre and the Development Framework being produced by Muse will support and strengthen these. The creation of a Town Centre Development Framework is acknowledged in the supporting policy text to Policy OTC1, which is welcomed by Muse.	Support noted.
DLP67	Mr & Mrs Beesley		Need to recognise the importance of the Civic Centre buildings and value the contribution they make to the town. To demolish them away without recognising their cultural and townscape significance that celebrates the civic pride of the town would be a huge loss. From which future generations, when they look back at the town's development as described in these proposals, would lament the loss of the town centre's most significant landmark in the landscape. Further details are included as to why buildings in the Town Centre should be retained.	Comment noted. Any development proposals affecting heritage assets will be considered in accordance with national planning and the adopted Local Plan.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as integration of sustainable infrastructure connections around key public transport hubs	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			may reduce car use, which will not only benefit the environment but also reduce the number of vehicles looking to utilise the SRN. In addition, the policy seeks to support the borough becoming carbon neutral by 2030 which is in line with National Highways policy.	
DLP77	Mrs J A Hill		Comments on the Civic Centre Site - proposals to demolish the Council Chambers and QE Hall are baffling and disheartening. Their potential to be repurposed should not be underestimated. They are of cultural and architectural significance.	Comment noted. Any development proposals affecting heritage assets will be considered in accordance with national planning and the adopted Local Plan.
DLP57	Julie Ball		Support the development of residential uses in the town centre. This should improve its economy. There needs to be thought put into the types of shops and parking, such as no more vape shops, betting shops and chicken shops. Rents need to be low enough to encourage shops and businesses to come to Oldham.	Support noted. The Publication Local Plan provides a positive approach to the growth and management of our centres and measures have been included for maintaining the vitality and viability of our centres.

Table OTC2: Responses submitted on Policy OTC2 Protecting and Enhancing Oldham Town Centre Conservation Area

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy. See comments on views in Table OTC1 above.	Support noted.
DLP17	Charlotte Lister		Support the policy. The Coliseum should be included in the conservation area along with all of Yorkshire Street and streets off it up to and including Stocco, to improve the character of the area and preserve the historic buildings.	Support noted. Oldham Town Centre Conservation Area has been redefined through the Conservation Area Appraisal and Management Plan which provides a strong justification and evidence base for the new boundary.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP19	April Martin		Objects to policy. The Oldham Coliseum Theatre deserves to be preserved for the enjoyment of this and future generations.	Though not within the scope of the Local Plan it is worth noting that Oldham Coliseum is currently undergoing renovation and is due to re-open in 2026.

Table OTC3: Responses submitted on Policy OTC3 Creating a Better Public Realm for Oldham Town Centre

	Name	Organisation	Summary of Comments	
DLP3	Emily Hycran	Historic England	Support the policy.	Support noted.
DLP17	Charlotte Lister		Object to the policy. Should not build big blocks of flats all over the town centre, they will be out of keeping with the historic nature of the town centre, especially around Yorkshire Street and Union Street. Especially not on Henshaw Street carpark.	Noted. However, the comment does not relate to the content of the policy.
DLP19	April Martin		Objects to policy. Do not rush in to replace our historic, characterful buildings to build new.	Noted. However, the comment does not relate to the content of the policy.
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Strongly support this policy, which requires major new development within the town centre to make a positive contribution to the public realm. The public realm will be developed and enhanced in the centre through providing a functional and accessible streetscape, establishing a spatial hierarchy of routes, introducing trees and landscaping and using robust and durable materials that promote cost effective and sustainable maintenance. The emerging Town Centre Development Framework will consider the	Support noted.

	Name	Organisation	Summary of Comments	
			public realm of the town centre and build upon this policy.	
DLP61	Andrew Leyssens	United Utilities	Request that an additional principle is added to this policy in relation to improvements to surface water management. Suggested text provided.	Noted. As the plan progresses towards Reg 19 Publication Plan stage, the policies will be reviewed and amended in accordance with the most up to date evidence, legislation and guidance available.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support and welcome the inclusion of principle 3 to create a greener, cooler and biodiverse town centre.	Support noted.

Table OTC4: Responses submitted on Policy OTC4 Green Infrastructure within and around Oldham Town Centre

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	Support the reference to green infrastructure. Please note green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.	Support noted. It is considered that green infrastructure is sufficiently referenced in the Natural Environment, Open Land and Communities Chapters of the Local Plan.
DLP17	Charlotte Lister		Support the policy.	Support noted.
DLP19	April Martin		Support the policy.	Support noted.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Agree with and fully support this policy, especially points 3, 4 and 6. It is important that urban	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			communities have good access to green space and Green Infrastructure.	
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd - Oldham Town Centre	Under this policy, proposals which protect, create and enhance Green Infrastructure within and around the town centre will be supported. The requirement to enhance green infrastructure through development is reiterated in Policy N3, in relation to housing development specifically. Muse support this policy and recognise the importance of providing green infrastructure within the town centre, which will be reflected in the emerging Town Centre Development Framework.	Support noted.
DLP61	Andrew Leyssens	United Utilities	Welcome criterion 4 and 6 of this policy. However, request they both reference sustainable drainage systems.	Support noted. An amendment has been made to the policy to reflect this comment. Criteria 6 now reads: <i>Proposals will be supported that protect, create and enhance multi-functional Green Infrastructure within and around Oldham Town Centre, including: the use of nature-based solutions and sustainable drainage systems to manage surface water flood risk in the town centre and its integration as part of multi-functional green infrastructure.</i>
DLP71	Richard Clowes	TfGM	Policy refers to the Bee Network. It is our understanding that because the Bee Network does not form part of the Oldham Local Plan, it is not appropriate to refer to it in a policy and this reference should be moved to the Reasoned Justification.	Comment noted. Reference to Bee Network has been removed from policy.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as integration of green and blue infrastructure may reduce car use, which will not only benefit the	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			environment but also reduce the number of vehicles looking to utilise the SRN.	

Table OTC5: Responses submitted on Policy OTC5 Creating better vehicular parking and drop off facilities in Oldham Town Centre

This policy has been removed.

	Name	Organisation	Summary of Comments	
DLP17	Charlotte Lister		Object to the policy. Parking is fine as it is. Henshaw Street carpark should be retained, as that is the nearest carpark to the historic Coliseum Theatre which should be brought back into use.	This policy has been removed. Proposals for parking in Oldham Town Centre will be supported where they are compliant with Policy T3 'Parking provision', relevant national planning policies, PfE and other relevant Local Plan policies.
DLP19	April Martin		Support the policy.	This policy has been removed. Proposals for parking in Oldham Town Centre will be supported where they are compliant with Policy T3 'Parking provision', relevant national planning policies, PfE and other relevant Local Plan policies.
DLP71	Richard Clowes	TfGM	Supports the policy however this policy doesn't currently include any criterion relating to drop off facilities. Suggest the word 'vehicle' is missing from one of the sentences. Is the policy discussing fast charging or rapid charging? It will be important not to encourage additional car trips into the town centre for the sole purpose of accessing a rapid charger. This could be a	This policy has been removed. Proposals for parking in Oldham Town Centre will be supported where they are compliant with Policy T3 'Parking provision', relevant national planning policies, PfE and other relevant Local Plan policies.

	Name	Organisation	Summary of Comments	
			problem if there are limited rapid chargers elsewhere across Oldham. Paragraph 12.27 states "A surplus of surface car parks can also hinder regeneration, contributing little to the visual fabric of the townscape." A surplus of surface car parks also contributes little to the economic performance of the town centre. Paragraph 12.30 states "Our intention is to limit the amount of car trips being undertaken to the town centre whilst improving the range, quality and distribution of available on street parking." It may also be worth stating here that this will also involve improving the choice of sustainable modes of travel to and from the town centre.	
DLP72	Adam Johnson	National Highways	It is welcomed that the policy will seek to consolidate and improve existing car parking provision within Oldham Town Centre with an evidence base required for any proposals that are not identified in the Parking Strategy. It is also welcomed that the policy favours electric vehicle charging points within the town centre to encourage and support the use of electric vehicles.	This policy has been removed. Proposals for parking in Oldham Town Centre will be supported where they are compliant with Policy T3 'Parking provision', relevant national planning policies, PfE and other relevant Local Plan policies.

11. Responses submitted on the Addressing Climate Change Policies

Table CC1: Responses submitted on Policy CC1 Sustainable Construction, Energy Efficiency and Retrofitting

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy - subject to an amendment. The significance of a designated heritage asset can vary between assets and therefore the word 'characteristics' should either be replaced with significance or this word should be inserted to accompany it.	This policy has now been deleted as it was considered to replicate PfE.
DLP4	Hyacynth Cabiles	NHS Property Services	Fully support policies that promote carbon neutral development, and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. In considering the implementation of policies related to net zero, highlight that NHS property could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	This policy has now been deleted as it was considered to replicate PfE.
DLP11	Simon Tucker	Canals and River Trust	Due to the nature of the wider borough, with steep sided valleys and numerous water resources, this section of the document could be more effective if the descriptive text provided examples of low carbon energy sources, to help signpost developers and decision makers to examples they may wish to consider that could be viable in the local area. Specifically, water source heat pumps and the use of micro hydroelectric generation could be feasible in the local area. Without signposting, there is a risk that certain feasible options for low carbon energy generation may not be considered during the assessment and	<p>This policy has now been deleted as it was considered to replicate PfE.</p> <p>The Reasoned Justification under Policy CC2 (Policy CC1 in the Publication Plan) provides a link to the Oldham Local Area Energy Plan which outlines opportunities for renewable and low carbon energy within the borough. The text also shows details of a Minewater Energy Centre. The supporting Topic Paper also provides</p>

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			decision phase. Wish to highlight that water resources from our network are commonly used for active cooling and heating solutions in new developments, including the use of water source heat pumps, which can be more efficient than air source alternatives.	some detail. It is considered that this is sufficient signposting.
DLP22	Dan Ingham	Russell Homes (Santec)	Do not object to the policy but the council should ensure that it is only implemented in line with the December 2023 Written Ministerial Statement which states that 'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise'. It goes on to state that 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'. It would be appropriate to make reference to the Future Homes Standard and the	This policy has now been deleted as it was considered to replicate PfE.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			Building Regulations as the appropriate standards for development.	
DLP23	Joanne Harding	Home Builders Federation	Support the council in seeking to meet the challenge of mitigating and adapting to the effects of climate change. The council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement which states that 'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'. It goes on to state that 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity	This policy has now been deleted as it was considered to replicate PfE.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'. It would be appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development.	
DLP32	Martyn Walker	Lancashire Wildlife Trust	In paragraph 13.2, it will be difficult if not impossible for GMCA to meet their commitment of carbon neutrality without taking into account the regions peat soils. Providing avenues for peatland restoration and better management of peat soils is essential in meeting the carbon neutrality commitment. Welcome the Oldham Green New Deal Commitment and targets for council carbon neutrality by 2025 and for the borough by 2030 (paragraph 13.5). However, need to take into account the boroughs peat soils and the part they have to play in combating climate change and meeting the challenging targets set. Agree with and welcome requirement 4. Suggest that the soft landscaping and habitat provision should seek to create corridors to aid the movement northwards of species responding to changing climatic conditions.	This policy has now been deleted as it was considered to replicate PfE. References to peat have been added throughout the plan.
DLP34	Pauline Shearer	Sport England	Objects to the policy in relation to bullet point 4, discourages the use of playing field for this purpose, particularly at educational sites and would like to see reference to playing field	This policy has now been deleted as it was considered to replicate PfE.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			protection within this policy. Suggested wording provided around how landscaping and biodiversity measures on playing field land need to meet policies and guidance.	
DLP48	Ziyad Thomas	Planning Issues on behalf of Churchill Retirement Living	Support the policy.	Support noted. However, this policy has now been deleted as it was considered to replicate PfE.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Supports the principle of requiring developments to achieve high standards of sustainable design and construction in order to mitigate the effects of climate change and realise the ambition of the council to achieve carbon neutrality by 2030.	Support noted. However, this policy has now been deleted as it was considered to replicate PfE.
DLP54	Natasha Styles	The Planning Bureau on behalf of McCarthy Stone	The council's commitment to meeting its carbon neutrality target is commendable but it appears the council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. Any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations.	This policy has now been deleted as it was considered to replicate PfE.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	New developments need to address climate issues. Need a 'right first time' approach to carbon reduction and energy efficiency standards in new builds. The council must explore ways to incentivise solar panel schemes. Retrofitting is a crucial step in bringing our existing housing stock up towards a zero-carbon standard.	PfE policies set out the approach to energy requirements for new developments and is now supported by the GM Net Zero Design Guidance. Each GM authority also has a Local Area Energy Plan. The Council is seeking to secure a Green New Deal Delivery Partner to deliver low carbon projects across the borough. The Council is also working with

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
				the GM Green Economy to support local companies take advantage of low carbon opportunities.
DLP40	Jackie Copley	CPRE	To ensure for carbon zero development, encourage sustainable design principles, and requirement of solar PV on residential and commercial roof space to maximise building energy efficiency. It can help us respond to the climate emergency and cost of living crisis.	PfE policies set out the approach to energy requirements for new developments and is now supported by the GM Net Zero Design Guidance. Each GM authority also has a Local Area Energy Plan. The Council is seeking to secure a Green New Deal Delivery Partner to deliver low carbon projects across the borough. The Council is also working with the GM Green Economy to support local companies take advantage of low carbon opportunities.
DLP71	Richard Clowes	TfGM	Support the policy but notes that CO2 emissions from transport also contribute to climate change and these are addressed in other parts of the plan.	Support noted. However, this policy has now been deleted as it was considered to replicate PfE.

Table CC2: Responses submitted on Policy CC2 Renewable and Low Carbon Energy

In the Publication Plan this policy has been renumbered and is now Policy CC1.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy.	Support noted.
DLP14	Zoe Haystead	Natural England	Welcome reference to Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors SAC. However, note a 400m buffer has been applied. Development should have regard to Functionally Linked Land which may extend beyond this radius. The Local Plan should also recognise the opportunities and role nature plays in providing key services for climate change adaption. This may include greater emphasis on nature-based solutions such as peatland restoration and woodland creation. Strongly recommend that the objectives reflect the protection and enhancement of peatlands. Do not support the principle of developing on peat and we do not support peat extraction. Evidence and documents provided to support these comments.	Reference to the role that nature plays in providing key services for climate change has been added to the introduction paragraphs within the climate change section. Reference to Functionally Linked Land has been added to Policy CC1 criterion 3 as well as reference to the South Pennine Moors SAC/SPA SPD in the Reasoned Justification. Reference to Peat added to Policy CC1 criterion 4. Reference to Natural England's Peat Map and the Field Protocol has also been added to the Reasoned Justification of Policy N1.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Welcome and agree with point 4 and that the provision of low carbon energy supplies must take into account and protect existing biodiversity, habitats and species interest. Recommend adding the need to protect deep peat soils from inappropriate development, such as the siting of windfarms and turbines. This could be incorporated into either requirement 3 or 8. Support the need to protect the South Pennine Moors SAC/SPA. Specific reference should be	Support noted. Reference to peat added to Policy CC1 criterion 4. Reference to Natural England's Peat map added to Reasoned Justification of Policy N1.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			made to deep peat soils being protected from adverse development. Welcome and support the council proposals for renewable energy, providing that any adverse environmental and biodiversity issues are addressed. This should again include restrictions on development on deep peat deposits. Agree with and support the exclusion of 400m of the South Pennine Moors SAC/SPA from the search area for wind energy as set out in paragraph 13.21. Reference needs to be made to the exclusion of deep peat soils. In paragraph 13.23 reference could be made to the peat maps Natural England are reviewing and which the Local Plan must take account of in proposing locations for windfarm development.	
DLP33	Sarah Welsh	Peak District National Park	Policy refers to the Green Belt and nature conservation designations and constraints are set out in the accompanying justification text in paragraph 13.23. The setting of the National Park should be listed as a constraint.	The purposes of the Peak District National Park have been added (criterion 14).
DLP34	Pauline Shearer	Sport England	Object to the policy, discourages the use of playing field for this purpose, particularly at educational sites and would like to see reference to playing field protection within this policy. Suggested wording provided around how renewable and low carbon energy development on playing field land needs to meet the relevant policies and guidance.	Criterion 7 include loss of open space, and this includes playing pitches. The communities' section of the Publication Plan addresses open space and the plan should be read as a whole.
DLP61	Andrew Leyssens	United Utilities	Welcome criterion 7 of this policy. However, recommend additional specific policy relating to water catchment land suggested wording provided.	Support noted. Water catchment land added to criteria. The suggested text has been added to the Reasoned Justification.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP72	Adam Johnson	National Highways	Policy is in line with DfT Circular 01/2022 as integration of renewable and low carbon energy developments is likely to include infrastructure including electric vehicle charging points, as well as other green infrastructure and active travel modes that will pay due regard to the highway. This will not only benefit the environment but also reduce the number of vehicles looking to utilise the SRN.	Support noted.
DLP71	Richard Clowes	TfGM	Support the policy but notes that CO2 emissions from transport also contribute to climate change and these are addressed in other parts of the plan.	Support noted.

Table CC3: Responses submitted on Policy CC3 Managing Flood Risk

In the Publication Plan this policy has been renumbered and is now Policy CC2.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP11	Simon Tucker	Canals and River Trust	Take no issue with the specific wording provided. Wish to highlight that flood risk from canals can exist, even though they are a managed asset, due to interactions with other watercourses. As a result, advise that developers should ensure that their Flood Risk assessments address this risk where applicable, including the residual risk of any infrastructure failure.	Support noted. Have added in reference to Canal Hazard Zones in criterion 7 and the Reasoned Justification to make presence of this source of flood risk clearer.
DLP12	Sylvia Whittingham	Environment Agency	Agree with the overall content of the policy, however, note the reference to locating development outside of Flood Zones 2 and 3 and applying the sequential test. Whilst this is welcomed, the national guidance states that a sequential, risk-based approach should be	Comments noted. The policy has been amended to state development should be located in areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. The

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. It may be appropriate include reference to surface water risks in this paragraph relating to the sequential test.	policy has also removed reference to exceptional circumstances.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Welcome and support the requirement to site development away from flood risk areas (paragraph 13.26). Agree with and support the policy, especially in relation to requirement 16. Welcome that zone will 3b form part of the borough's green infrastructure (paragraph 13.28).	Support noted.
DLP61	Andrew Leyssens	United Utilities	Generally supportive of the policy, in particular the reference to all forms of flood risk. Supportive of the explanatory text at paragraph 13.40 which references the need to consult with U UW. Request reference is also made to the need to consult with U UW regarding any risk of flooding from reservoirs in accordance with the planning practice guidance. Request some text inserted which precedes criterion a) to set this out. Also request that paragraph 13.40 is finished with a statement regarding changes in levels and changes to public sewers. Suggested wording for both provided. Further detailed information is also included about additional requirements for reservoir flooding and sewer flooding with some additional wording suggested.	Support noted. The following text has been added to the Reasoned Justification of Policy CC2: <i>Applicants must engage with United Utilities if a site is identified as being at risk of flooding from a reservoir.</i> <i>Applicants must not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk.</i>
DLP71	Richard Clowes	TfGM	Support the policy but note that CO2 emissions from transport also contribute to climate change and these are addressed in other parts of the plan.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP57	Julie Ball		Support the proposed use of the mine shaft heating. There is no mention of the extra cars/lorries from the Stakehill development, however, so no vision to reduce pollution from traffic.	Support noted. In relation to Stakehill, this site was allocated as part of PfE. Any development on the site will have to meet the criteria of the allocation policy (JPA2) including having regard to the transport interventions that have been set out in Appendix D of PfE. Proposals will also have to have regard to other relevant PfE, national and local planning policies which will include policies in relation to air quality.

Table CC4: Responses submitted on Policy CC4 Sustainable Drainage – Foul and Surface Water

In the Publication Plan this policy has been renumbered and is now Policy CC3.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP11	Simon Tucker	Canal and River Trust	Policy includes reference to the opportunity to discharge water to surface water bodies. Agree, in certain circumstances, to the introduction or reuse of surface water discharge points to our network. However, highlight that the Trust own and manage our waterways, and that discharges to our network require our consent and are not guaranteed. The Trust are not a drainage authority. Discharges agreements are subject to an assessment of the impact on the management of our water resources, in addition to any commercial agreement. Account of this position would be needed by prospective developers and decision makers when determining how to design surface water drainage from site. Request that the	<p>Suggested text has been incorporated into the Reasoned Justification of Policy CC3:</p> <p><i>Developers should be aware that surface water discharges to some waterways, including canals owned by the Canal and River Trust, may require the consent of riparian landowners. Developers should ensure that they gain relevant consent(s) as appropriate.</i></p>

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			explanatory text includes reference to this, as it would help to make this matter clearer to decision makers and prospective developers at an early stage of development. Suggested text is provided.	
DLP12	Sylvia Whittingham	Environment Agency	Comments that Schedule 3 of the Flood and Water Management Act 2010 in England is to be implemented in 2024 and will provide a framework for the approval and adoption of sustainable drainage systems into new developments. The adoption of multifunctional, above ground SUDs solutions provides a new tool that can provide part of the solution in improving water quality of Oldham's rivers and streams through development process.	Support noted. Reference to Schedule 3 of the Flood and Water Management Act has been added to Reasoned Justification of Policy CC3.
DLP14	Zoe Haystead	Natural England	Advise that sustainable drainage systems can perform a range of functions including improved flood risk management, provision of accessible green/blue space, climate change adaptation and biodiversity enhancement. Wish to see the opportunity for nature-based solutions reflected in the wording of the policy. Treated foul and surface water discharges can have implications to waster sensitive designated sites such as Rochdale Canal SAC and Rochdale Canal Site of Special Scientific Interest (SSSI) and peat habitats found within South Pennine Moors SAC, South Pennine Moors Phase 2 SPA and Dark Peak SSSI.	<p>Reference to nature-based solutions added in relation to the four pillars of sustainable drainage in the Reasoned Justification of Policy CC3.</p> <p>The impact of discharging treated water to surface water has been considered by the HRA and mitigation text added to Policy CC3 as follows:</p> <p><i>Any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA.</i></p>

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP32	Martyn Walker	Lancashire Wildlife Trust	Agree with and welcome the requirement for water retention on site to be maximised. This will require a range of SUDS designs and infrastructure that can have the added benefit of providing good quality biodiversity habitats. Welcome the requirements that greenfield sites and brownfield sites will be expected to achieve greenfield run-off rates and that for a holistic site-wide drainage strategy (paragraph 13.46), as this should lead to better and more joined up thinking on flood risk management.	Support noted.
DLP41	Brian O'Connor	Lichfields on behalf of Russell LPD	Policy requires holistic site-wide drainage, foul and surface water strategies for any development proposal which is part of a wider allocation. Russell LDP submitted representations to PfE which made a strong case for splitting JPA2 into separate northern and southern allocations. This modification was not subsequently taken forward in PfE but additional text was inserted into the policy's reasoned justification which acknowledges that in the case of JPA2, a site-wide masterplan may not be necessary because of the size of the allocation. It is appropriate that drainage strategies will come forward individually for the two distinct and separate elements of the allocation, alongside applications for their respective development proposals. Suggest text is included at the start of the second to last paragraph: "With the exception	Comment noted. However, for most sites a site wide drainage strategy would be sought. Applications for Stakehill can as part of pre-application discussions discuss how the site is bought forward, with reference to paragraph 11.55 of PfE. However, JPA 2 was not split into northern and southern allocations and has remained as one allocation.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			of some strategic allocations in PfE, which have discrete development parcels,..."	
DLP61	Andrew Leyssens	United Utilities	Welcome the inclusion of this policy. In addition, request site-specific policies are included regarding the approach to drainage when allocating a site. Request your site-specific policy clearly states that applicants must make space available in their proposals for multi-functional sustainable drainage. Suggested wording is provided.	The Local Plan is not allocating any sites anymore therefore site-specific wording not required.
DLP71	Richard Clowes	TfGM	Support the policy but notes that CO2 emissions from transport also contribute to climate change and these are addressed in other parts of the plan.	Support noted.

Table CC5: Responses submitted on Policy CC5 Water Efficiency

In the Publication Plan this policy has been renumbered and is now Policy CC4.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person. A policy requirement for the 'optional' water efficiency standard must be justified by	The justification for the optional water efficiency standard is provided by United Utilities and is reflected in the Climate Change Topic Paper.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
			credible and robust evidence. If the council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the council should justify doing so by applying the criteria set out in the PPG. The requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.	
DLP23	Joanne Harding	Home Builders Federation	All policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the council should justify doing so by applying the criteria set out in the PPG. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The North West and Oldham are not considered to be an area of Water Stress as identified by the Environment Agency. Therefore, consider that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.	The justification for the optional water efficiency standard is provided by United Utilities and is reflected in the Climate Change Topic Paper.

ID No / Ref	Name	Organisation	Summary of Comment	Council's Response
DLP41	Brian O'Connor	Lichfields on behalf of Russell LPD	Concerns with this policy because it lacks clarity in terms of how applicants for major non-residential developments should comply with it. Buildings are given an overall BREEAM rating based on the number of credits achieved across a range of categories. Whilst credits can be achieved for water efficiency, that count towards the overall BREEAM score, there are not specific 'excellent' or 'very good' standards for water efficiency. To ensure the policy is clear for applicants and decision makers alike, the required water efficiency standards for non-residential major development should be listed in the policy, its explanatory text, or an appendix to the plan.	Policy amended to require major non-residential developments to achieve five credits for Category Wat 01 of BREEAM unless impracticable. This equates to Very Good / Excellent.
DLP61	Andrew Leyssens	United Utilities	Welcome the inclusion of this policy, however understand that the target measure of water used for BREEAM 'Excellent' and 'Very Good' are the same. As such, the policy should be amended accordingly.	Policy amended to require major non-residential developments to achieve five credits for Category Wat 01 of BREEAM unless impracticable. This equates to Very Good / Excellent.
DLP71	Richard Clowes	TfGM	Support the policy but notes that CO2 emissions from transport also contribute to climate change and these are addressed in other parts of the plan.	Noted.

Table CC6: Responses submitted on Policy CC6 Groundwater Source Protection Zones

In the Publication Plan this policy has been renumbered and is now Policy CC5.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP61	Andrew Leyssens	United Utilities	Supportive of the policy and have identified sites which are within either Groundwater Source Protection Zone 1 or Groundwater Source Protection Zone 2. This information should be reflected in site - specific policy.	Support noted. Site allocations are no longer being taken forward as part of the Local Plan.
DLP71	Richard Clowes	TfGM	Support the policy but notes that CO2 emissions from transport also contribute to climate change and these are addressed in other parts of the plan.	Noted.

Table CC7: Responses submitted on New Suggested Policies for Addressing Climate Change

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP61	Andrew Leyssens	United Utilities	UUW wishes to note that large parts of Oldham are public water supply catchment land. Development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. Please get in touch for information on the location of catchment land in the borough. We have reviewed the draft allocations for housing, employment and mixed use and note that there are no potential sites identified on water catchment land.	Policy on Water Catchment Land was not considered necessary as the Council is not allocating sites and the SHLAA does not tend to include sites that are in the area covered by the water catchment land and new housing will be restricted by PfE Policy JP-G5 in that location. However, Policy CC1 includes water catchment land within the list of criteria.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			<p>Notwithstanding this, you will still need to ensure that there is a policy in your local plan which addresses other proposals that may come forward in such locations.</p> <p>In cases of wind energy proposals on water catchment land, the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and the inclusion of mitigation measures in the design and construction process. It is particularly important to avoid the location of new wind turbines on deep peat land.</p> <p>We recommend you include the following policy relating to water catchment land.</p> <p>'Water Catchment Land</p> <p>Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are brought forward on catchment land used for public water supply, careful consideration must be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.'</p> <p>For any site-specific allocations that you may</p>	

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			identify which fall in such locations, it will be important that adequate information is presented to justify the principle of the development in advance of allocation and that the proposal is covered by site-specific policy which clearly identifies this constraint and the need for proposals to be undertaken in accordance with the above recommended policy.	
DLP61	Andrew Leyssens	United Utilities	<p>We wish to recommend the following policy for inclusion in any new local plan. (See also our comments in respect of Policy LE13 Air Quality). 'New development must ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by neighbouring uses and vice versa. When applicable, applicants will be required to submit the relevant impact assessments, outlining any adverse effects from the neighbouring site, and any required mitigation.'</p> <p>Within Table 5 we have identified sites which are in proximity to existing wastewater treatment works. , We request that you include provision within any site-specific policy that identifies the need to undertake impact assessments associated with proximity to a wastewater treatment works to ensure an acceptable level of amenity for any proposed development. We recommend the below site-specific policy. 'New development must ensure that the occupiers of the development will enjoy an appropriate</p>	Policies LE1 and LE2 address amenity issues. Policy not included as Policy on Green Belt will be determined in line with national planning policy or relevant planning policy.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			<p>standard of amenity and will not be adversely affected by the wastewater treatment works in proximity to the site. Applicants may be required to submit relevant impact assessments, outlining any adverse effects from the wastewater treatment works, and any required mitigation.'</p> <p>We have previously provided site plans for a selection of our wastewater treatment works in the borough which include:</p> <ul style="list-style-type: none"> • Oldham wastewater treatment works; • Failsworth wastewater treatment works; • Royton wastewater treatment works; and • Saddleworth wastewater treatment works. <p>On this basis, we are of the opinion that national policy is broadly supportive of expansion of our key sites of operational infrastructure in the green belt. However, we ask for this to be specifically referred to in your future planning policies and reflected on your proposals map. We recommend a policy based on the following wording.</p> <p>'The Council will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives including development proposals for water and wastewater infrastructure in protected areas such as the</p>	

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			<p>green belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs.'</p> <p>We wish to specifically draw the council's attention to our sites at Failsworth Wastewater Treatment Works and Saddleworth Wastewater Treatment Works (site plans previously provided) which are located in the green belt. We request that these are specifically identified on the proposals map where investment in future water and wastewater needs would be acceptable. This policy would enable us to ensure we can continue to meet the growth and development aspirations of the region, by ensuring that fundamental infrastructure requirements are met and that we are able to respond to the need for investment in our assets to protect the environment, maintain water supply and reduce flood risk.</p>	

12. Responses submitted on the Natural Environment and Open Land Policies

Table OL1: Responses submitted on Policy OL1 Consideration for the Peak District National Park

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	Support measures which conserve and add value to the Peak District National Park. The conservation and enhancement of wildlife and cultural heritage are important considerations and should be given great weight in National Parks.	Support noted.
DLP30	Mark J Jones	Jones Planning	Support the policy.	Support noted.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support the policy.	Support noted.
DLP42	Nick Reeves	Kirklees Council	Support the policy as it protects the Peak District National Park.	Support noted.
DLP76	Daniel Scott		Support the policy.	Support noted.
DLP33	Sarah Welsh	Peak District National Park	Recommend strengthening references to the National Park - text on the new version of Section 62 Duty provided and the Local Plan should now reflect that updated text.	Text amended to <i>"Where possible, opportunities to further the purposes of the Peak District National Park will be sought."</i>

Table OL2: Responses submitted on Policy OL2 Protecting and Enhancing Oldham's Green Belt

This policy has been renamed to 'Oldham's Green Belt' in the Publication Plan.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP32	Martyn Walker	Lancashire Wildlife Trust	In general agreement with the policy but would suggest amending the final paragraph ' <i>The enhancement and positive use of Green Belt will be encouraged in line with national planning policy and PfE Policy JP-G10</i> '. Suggest that the positive enhancement of Green Belt needs to be a requirement if Green Belt land is lost to development and not simply encouraged. In general agreement with the list of acceptable enhancements to the Green Belt in paragraph 14.13. Recommend there be a requirement to protect existing nature conservation interest and that increased accessibility should not lead to unacceptable increased disturbance to sensitive habitats or species.	Reference to the enhancement and positive use of the Green Belt has been removed as this is covered by PfE.
DLP39	Alan Chorlton		There should be a full Green Belt Review, rather than a technical "tidying up" exercise.	PfE has amended the Green Belt boundary for the purposes of meeting development needs. There is no need to review the Green Belt for the Local Plan. Therefore, only technical amendments are being looked at as part of the Local Plan non-strategic policies.
DLP76	Daniel Scott		Support the policy.	Support noted.
DLP44	Wiktorja Sypnicka	Emery Planning on behalf of	Further Green Belt release is required to meet the housing requirement moving forward. Site suggested for release: Land associated with Hollyville and Land off Steadway. If it is not	PfE has amended the Green Belt boundary for the purposes of meeting development needs and considered these sites as part of this process. There is no

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
		Chasten Holdings Ltd	released for development, suggest it is released as Safeguarded Land.	need to review the Green Belt for the Local Plan. Therefore, only technical amendments are being looked at as part of the Local Plan non-strategic policies.
DLP43	Wiktora Sypnicka	Emery Planning on behalf of Joe Jaskolka	Further Green Belt release is required to meet the housing requirement moving forward. Site suggested for release: Land off Ripponden Road. If it is not released for development, suggest it is released as Safeguarded Land.	PfE has amended the Green Belt boundary for the purposes of meeting development needs and considered this site as part of this process. There is no need to do this for the Local Plan. Therefore, only technical amendments are be looked at as part of the Local Plan non-strategic policies.
DLP64	Stephen Harris	Emery Planning on behalf of Mr W Lumb	Further Green Belt release is required to meet the housing requirement moving forward. Site suggested for release: Land north of Trent Industrial Estate. If it is not released for development, suggest it is released as Safeguarded Land.	PfE has amended the Green Belt boundary for the purposes of meeting development needs. There is no need to review the Green Belt for the Local Plan. Therefore, only technical amendments are being looked at as part of the Local Plan non-strategic policies.
DLP65	Stephen Harris	Emery Planning on behalf of Sheridan Group	Further Green Belt release is required to meet the housing requirement moving forward. Site suggested for release: Land at Bottom Field Farm. If it is not released for development, suggest it is released as Safeguarded Land.	PfE has amended the Green Belt boundary for the purposes of meeting development needs and considered this site as part of this process. There is no need to review the Green Belt as part of the Local Plan. Therefore, only technical amendments are being looked at as part of the Local Plan non-strategic policies.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP30	Mark J Jones	Jones Planning	Objects to the policy. It does not need to be as detailed as the NPPF provides clear guidelines for assessing development in the Green Belt. The existing policy regarding the Green Belt is more acceptable. There is no need to define the design of stable construction - notwithstanding its materials the key issue is whether it harms openness and not whether it is built out of timber, stone or brick - design considerations should be covered by a general design policy. Limited infilling in villages must be determined on a case-by-case basis.	The Council has expanded on these types of development further to ensure that developments such as facilities for recreation, for example stables, and buildings for agriculture are appropriate for their intended use through considering the design, layout and form of construction. This is to prevent permission being given for the above intended uses later being subject to a planning application for the re-use of buildings for an alternative use such as residential use. However, wording on infilling has been amended to take into account the appeal statement for Steadway.

Table OL3: Responses submitted on Policy OL3 Extensions and alterations to existing buildings within the Green Belt

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP30	Mark J Jones	Jones Planning	Object to the policy. The 30% figure for extensions to existing buildings must be fully justified for it to have any relevance. The policy needs to explain how this figure has been derived for it to be relevant. There have been many appeal decisions that have allowed larger extensions. Unless the council can justify why 30% has been chosen it would be better just to take it out and allow each case to be assessed on its merits.	<p>This policy provides clarity on how the Council may determine whether an extension of alternation is proportionate or is disproportionate over and above the size of the original dwellings.</p> <p>In preparing this policy, plan policies prepared elsewhere across England were examined and the Council also reviewed some planning applications that have determined for extensions and alterations to existing buildings in the Green Belt.</p> <p>There have been proposals where permission has been granted within the borough which exceed one third and these have been found to be acceptable.</p> <p>Reflecting on this further, the policy has been amended to 40%. Therefore, some flexibility has been built into the policy and anything that exceeds 40% would need to be justified to demonstrate that the proposal is proportionate or that very special circumstances apply.</p>
DLP76	Daniel Scott		Support the policy.	Support noted.

Table OL4: Responses submitted on Policy OL4 Local Green Spaces (LGS)

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP30	Mark J Jones	Jones Planning	Support the policy.	Support noted.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Agree with and support the commitment to preserve the identified LGS. In relation to paragraphs 14.22 and 14.24, whilst the removal of the sites is in line with PfE allocations, would emphasise that LGSs are not just important for people but can also be important for wildlife. It is vital that any proposed development must provide sufficient ecological surveys and data to ensure the identification of existing biodiversity interest. Development plans must detail the protection of any identified section 41 species, and where this is not possible, they must provide sufficient off-site compensation to ensure that their populations are not adversely impacted.	Support noted. The plan must be read as a whole. Policies on nature address the concerns raised. However, a sentence has been added to the Reasoned Justification to make clear that where necessary ecological surveys are required in line with Policy N1.
DLP34	Pauline Shearer	Sport England	Where the LGSs as listed in Table OL1 contain playing field, the policy does not provide sufficient protection and is inconsistent with the NPPF in this regard. Suggest adding wording to reflect the intent of Sport England's Playing Fields Policy Exception E4 and Planning for Sport Objective 'Protect' which requires replacement provision to be accessible to existing and new users within catchment.	The plan must be read as a whole. Policy CO1 addresses protection of existing open space.
DLP39	Alan Chorlton		The reference to development being allowed where very special circumstances can be demonstrated is welcomed, as it brings it into line with the Green Belt tests.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP52	Andrew Bradshaw	CRE8 land & Planning	Object to the land off Maltby Court being included/retained within the existing Other Protected Open Land (OPOL) and proposed LGS Thornley Brook on the grounds that it does not meet the requirements for a LGS against the three criteria of beauty, tranquillity, and recreational value. An assessment has been included setting out the reasons as to why the site does not meet the criteria.	The Council's Local Green Space Assessment provides the evidence to support the site being designated as LGS. The appeal statement on Land off Maltby Court supports that development would cause a harmful intrusion to the green, undeveloped character. The decision states that NPPF sets out the need for development to be sympathetic to local character and to contribute to the enhancement of the natural and local environment by recognising the intrinsic character and beauty of the countryside. It states that undeveloped land can perform many functions and in this respect, I consider this can include the OPOL's aims of preserving the distinctiveness of an area.
DLP61	Andrew Leyssens	United Utilities	Note the policy includes a list of exceptions provided that they do not substantially harm other qualities related to the LGS. Request that utilities infrastructure is added to this list of exceptions. This reflects the fact that underground utility infrastructure is often located in urban areas in locations which are determined by engineering circumstances. Such infrastructure is normally essential to respond to future growth and environmental drivers.	The policy is in line with national policy on Green Belt, as recommended by NPPF policy for Local Green Spaces. However, the policy does list engineering operations as one of the exceptions.
DLP63	Lizzie Schofield	Millson Group on behalf of	Disagree that LGS 11 (Stonebreaks) has met the criteria for designation as an LGS. It is	The Council's Local Green Space Assessment provides the evidence that

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
		Stonesbreak Group	acknowledged that the area is local, it neither meets the requirement of being "demonstrably special" or holding "particular local significance". Goes on to set out a number of reasons in the form of a LGS Assessment as to why the site does not meet the criteria.	Stonebreaks meets the LGS criteria. There is no methodology stated in NPPF or the guidance for carrying out LGS Assessments however the Council considers the LGS assessment to be robust. Evidence from GMEU and GMAAAS has fed into it.
DLP76	Daniel Scott		Support the policy.	Support noted.
DLP58	Alison Shore		In relation to a new LGS identified, LGS 18 Sholver, within the green shading of this map is a significant proportion of the existing 'Sholver Millenium Green', held in trust for the community since 2000. It is not 'new' LGS. The map does have the legend 'Millenium Green' on it, but it is at the upper edge of the green shading. The land does encompass almost the whole of the east side of the shaded area, down to the reservoir feeder path above Pearly Bank. Is the plan proposing to change the designation of this land in order to offer it further protection from development or to identify it as deserving of further investment? It needs more support.	Support noted. A Local Green Space designation is a planning designation separate from a Millenium Green. Therefore, the LGS designation will give the site protection against inappropriate development in addition to any controls given by the Millenium Green status. The policy outlines what developments would generally be permitted but does not remove any further protections already afforded to the land. It does not however guarantee any further investment for the land. To clarify this an additional paragraph has been added to the Reasoned Justification to state: <i>"The LGS designation gives the land additional protection against inappropriate development in addition to any other constraints / designations, such as open space and nature designations relevant to</i>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				<i>the site. Parts of Sholver LGS is also a Millenium Green."</i>
DLP26	Dan Ingham	Elswood Family (Stantec)	Object to the inclusion of Foxdenton Hall Farm within LGS 3 noting that it is private land within a designation that seeks to deliver public open spaces, with a clear focus on public benefit and community value.	Having reviewed the representation and the assessment further the Council agrees that the land at Foxdenton Hall Farm should be removed. An amended boundary has been proposed.
DLP9	Nick Smethurst	Royton Cricket Club	Comments in relation to OPOL 1 Royley Clough - welcome the proposal in part but it would be their preference that the club land ownership is only re designated in part (the pavilion, cricket pitch and landscaping and spectator areas immediately adjacent to the cricket pitch).	The Council has amended the boundary to that shown in the representation.

Table OL5: Responses submitted on Policy OL5 Protecting Dark Skies and Tranquillity

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	Support measures which address light pollution as this can be harmful to wildlife and undermine enjoyment of the countryside or night sky, especially in intrinsically dark landscapes.	Support noted.
DLP30	Mark J Jones	Jones Planning	Support the policy.	Support noted.
DLP33	Sarah Welsh	Peak District National Park	This policy approach is also protective of the dark skies of the National Park.	Support noted.
DLP39	Alan Chorlton		Policy is welcomed.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP76	Daniel Scott		Support the policy.	Support noted.

Table OL6: Responses submitted on the Open Land Chapter in general

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP57	Julie Ball		There is not enough open land outside of the parks which is why everyone goes to places like Dove Stone. Maybe there could be more publicity around other places to walk in the Oldham borough, excluding the parks.	The Council's website highlights places to walk at https://www.oldham.gov.uk/letsqoforawalk and Oldham Communications do share walking routes.

13. Responses submitted on the Addressing the Biodiversity Emergency Policies

Table N1: Responses submitted on Policy N1 Protecting Nature

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support this policy.	Support noted.
DLP11	Simon Tucker	Canals and River Trust	Take no issue with the aims of this policy, which are generally supportive of the aims of the NPPF. The need for applicants to submit a supporting Ecological Assessment for sites adjoining or which could impact a protected site is in line with existing advice and legislation, and the wording of this in the draft policy would help sign post developers to the need for this. Highlight that cumulative effects of several smaller developments on SAC and SSSI habitats need to also be included in an Ecological Assessment. If possible, it would be useful if prospective developers could be signposted to this need.	Support noted. The HRA considers cumulative impacts of housing and employment requirements. SSSI are considered in line with Natural England advice.
DLP12	Sylvia Whittingham	Environment Agency	Would welcome a review of the current green corridors (paragraph 15.12) and recommend as part of review process that ecological quality of current water bodies and key ecological networks flowing through the borough be encompassed as part of this review process. With regards to mitigation for rivers and streams (paragraph 15.15) there will likely be significant environmental opportunities of not only adopting or extending green space buffers, but potentially also adopting equally valuable restoration techniques when designing new site surface water drainage schemes. Would recommend	Support for green corridor review noted. This has focussed on whether the existing corridors can still be justified, which has taken into account the LNRS which includes looking at opportunities for river, canals and waterbodies and other opportunities as identified in the nature network. Text has been added to the Reasoned Justification to reflect opportunities for mitigation for rivers and streams in paragraph 14.26.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			such opportunities are assessed early in the design process.	
DLP14	Zoe Haystead	Natural England	Support the policy links between OL4 Local Green Space, IN2 Planning Obligations and N3 Enhancing Green Infrastructure through development. Suggest making further links to LE3, CC4 and CC2. Welcome reference to PfE Policy JP-G9. Support the links made to PfE Policy JP-G5 and the South Pennine Moors SAC/SPA Supplementary Planning Document.	The decision was taken in the Publication Plan to remove policy linkages. The nature designations are shown on the policies map in addition to the core nature network (LNRS). Support PfE policies noted. More text has also been added to the Reasoned Justification regarding PfE Policy JP-G5 and the South Pennine Moors SAC/SPAs SPD and PfE Policy JP-C8 and the Holcroft Moss Planning Obligations SPD in paragraphs 14.9 to 14.11.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Welcome that Oldham recognises that we are facing a biodiversity emergency. Request lapwings are added to the list of species in paragraph 15.1. In paragraphs 15.5 and 15.6 it is worth noting that the amended Greater Manchester Local Nature Reserve Strategy (GMLNRS) will also be considering species where their management requirements are beyond that of a singular habitat or where habitat management alone will not stop and reverse their decline. Generally, agree with and support the policy. Suggest that it should state that there will be a presumption against developments that might adversely affect the hierarchy of sites, including local wildlife sites (SBI's). Advisable to include reference to the protection of ecological corridors and to make sure that development	Lapwings added to list of bird species that have declined in paragraph 14.3. More text has been added on the LNRS including on target species and actions to help them in paragraph 14.30. The policy wording has been amended to state <i>"The borough's hierarchy for designated sites and wider ecological networks is identified below and will be safeguarded in line with national policy"</i> . The wording has not been amended as recommended due to the need to write positive planning policies. Green corridors are included within the hierarchy. Reference to peat which is capable of restoration to support notable

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			does not adversely affect their function. Worth noting in point 3 that peat deposits underlying agricultural grasslands that are capable of restoration to peat bog should come under the definition of degraded bog. Given the timescale for the development of peat soils, point 5 should include a reference to priority species and not just priority habitats. In paragraph 15.12 welcome and support the intent to review green corridors in light of the emerging GMLNRS but would again draw attention to specific species strategies and management plans that might be recommended by the GMLNRS.	habitats added to criterion 5. Reference to priority species added to criterion 5. Support for Green Corridor review noted. Species strategies and management plans will be covered by the wider biodiversity duty.
DLP42	Nick Reeves	Kirklees Council	Support the policy.	Support noted.
DLP50	Rebecca Dennis	Pegasus on behalf of Mr & Mrs P.D. Martin	The policy says that sites designated for nature conservation and geodiversity will be protected from harm, including SBIs, taking into account their grade. Would like the following to be noted with regards the Sumner Street site - this site is within the boundary of the Shaw Side SBI as extended in 2019 however the appropriateness of the extended boundary is questionable - reasons as to why have been provided.	The extended SBI has been approved by Oldham Council. The Council have made GMEU aware of the representation for future reviews. The landowner may also request that GMEU re-assess the SBI based on the ecology information gathered and present information as part of any future planning application. Until such time policies on nature and the strategic allocation will be applied.

Table N2: Responses submitted on Policy N2 Restoring Nature

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP11	Simon Tucker	Canals and River Trust	No issue with the policy text. The Trust can consider proposals from developers to deliver net gains on its land but would undertake this on a case-by-case basis. In doing so, would have regard to Defra's guidance. The Trust's agreement to habitat enhancement activities being undertaken on our land would be subject to operational, management and commercial considerations.	Comment noted.
DLP12	Sylvia Whittingham	Environment Agency	Generally, welcome the policy, but it would be beneficial as part of this policy to highlight that as part of biodiversity metric assessment process is split up into three distinct elements, habitats, hedgerows and rivers. These units cannot be combined and are considered as three distinct outcomes in relation to their net gains or losses. A net gain will be required in all three-biodiversity unit 'types' where they are present within the baseline of the site. In relation to paragraph15.19, the small sites metric is to be adopted in April 2024, and will be the main assessment procedure for these smaller development areas. In regard to restoring nature it is recommended there is greater reference to current issues with invasive non-native species and how the planning system has a role to play in removing such species from the environment.	Noted. With regards to BNG much of the policy text has been removed in relation to this given that it is now statutory. Text has been added into the Reasoned Justification to Policy N2 regarding invasive species.
DLP14	Zoe Haystead	Natural England	Welcome the reference to LNRS. Also suggest reference is made to wider ecological networks. Ecological networks are coherent systems of natural habitats organised across whole	The revised policy includes more text on the LNRS including the nature recovery network.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			landscapes so as to maintain ecological functions. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.	
DLP23	Joanne Harding	Home Builders Federation	Consider that this policy may need to be kept under review as more information becomes available on the emerging guidance and legislation. PPG has recently been updated to provide more information on BNG which may assist the council as they consider this policy. The PPG states that plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provision of this statutory framework. It also states that it would be inappropriate to include policies which are incompatible with this framework.	Noted. Much of the policy has been removed considering statutory instruments on BNG and available guidance. The policy focusses mostly on the LNRS now.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Agree with and strongly support policy. The requirement for species enhancements and management also needs to be taken into consideration when determining adverse impacts on nature conservation interests. Agree that irreplaceable habitats cannot be compensated for through BNG (paragraph 5.20). It needs to be stated that the loss of irreplaceable habitat should only be permitted under exceptional circumstances and where bespoke compensation has been agreed. Welcome that the council is proactively working to ensure that there are options for off-site net gain to be delivered within Oldham close to where developments may be taking place (paragraph 15.21).	Reasoned Justification amended to make clear that loss of irreplaceable habitat should only be permitted in exceptional circumstances where bespoke compensation has been agreed (paragraph 14.38). Reasoned Justification to Policy N1 also amended to add that any species enhancements and management should be considered when determining adverse impacts (paragraph 14.24).

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP33	Sarah Welsh	Peak District National Park	Footnote 81 is missing and in the accompanying justification, paragraph 15.21, options for off-site provision could be made within the National Park. Government has removed the requirement to submit a Gain Plan at the validation stage, and the requirement will come through a pre-commencement condition. Looking at a local requirement for this information upfront. This could include whether an area proposed for off-site gain is suitable with regards to other considerations e.g. heritage/landscape.	Noted however text and footnote has been removed in light of amended policy. Noted the BNG metric allows for spatial risk to be reflected. Much of the text has been removed in relation to BNG. However, reference has been added to the Greater Manchester Habitat Bank Verification and Auditing Guidance which sets out how sites should be audited before an agreement is signed. This includes historic / archaeological / landscape constraints.
DLP34	Pauline Shearer	Sport England	Include an additional avoidance clause regarding biodiversity enhancements on playing field land meeting the requirements of Sport England's Playing Field Policy and Guidance and NPPF. Suggested wording provided.	Policy CO1 addresses loss of open space. The plan must be read as a whole. In addition, a Habitat Bank would as part of verification check there are no conflicting land uses.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Support the policy which reflects the recently mandated BNG statutory framework. It is noted that it does not refer to statutory biodiversity credits as a means to achieving a measurable net gain in biodiversity. To ensure that the policy accords with the aforementioned statutory framework, paragraph two in the policy wording should be updated to include reference to being able to obtain 'statutory biodiversity credits' at the end of the second sentence.	Noted. The policy has been revised therefore the text in relation to this point has been deleted. The statutory system allows for credits to be purchased, and this is also reflected in the BNG guidance referred to in the reasoned justification.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP52	Andrew Bradshaw	CRE8 land & Planning	Support the policy as worded and have demonstrated that the outline proposals for the land off Maltby Court will deliver a minimum 10% biodiversity net gain through the retention and enhancement of the existing green corridor to the south of the site together with additional planting and screening to the sites borders to help both screen the new development and provide improved habitat for wildlife and deliver a net gain in biodiversity.	Noted.
DLP61	Andrew Leyssens	United Utilities	Welcome the flexibility in the policy. Also note that biodiversity mitigation / enhancement should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity. Request that this is reflected in the policy and suggested wording is provided.	Text added to reflect this in the Reasoned Justification (paragraph 14.36).
DLP40	Jackie Copley	CPRE	Oldham has some valuable biodiversity and ought to be fully valued. Policies in the Local Plan should require additional BNG where justified (example provided). All new development and infrastructure should support the aims of the Local Nature Recovery Strategy. Supports brownfield first approach, but in cases where land is of ecological value it may be appropriate for land to be retained for nature or local amenity greenspace	Comments noted. Policy N2 seeks to enhance biodiversity including through having regard to the LNRS and BNG. Developers are free to achieve higher than 10% BNG.

Table N3: Responses submitted on Policy N3 Enhancing Green Infrastructure (GI) through development

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy.	Support noted.
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	Not aware of any justification or evidence for encouraging food production within a residential development. Would be concerned in relation to the implications of this policy in terms of viability, efficient use of land and site layouts. It is considered that this part of the policy should be deleted. The policy also notes that developments should aim for 20% tree cover, this has significant implications in relation to site densities, sites layouts, highways, ongoing maintenance, and the viability of development. It is considered that this part of the policy should be deleted.	The Green Infrastructure Strategy provides the justification for the inclusion of the criterion and recommends using Green Infrastructure for food supply where possible as part of the recommended policy approach (see page 132 of Green Infrastructure Strategy). In addition, increased opportunities for local food growing are an action within the LNRS. However, the word 'provide' has been replaced with 'facilitate' to put less of a requirement on the developer whilst ensuring that such space can be considered within the site layout. The introductory sentence states 'where appropriate'. Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP11	Simon Tucker	Canals and River Trust	Believe that access to our waterways can provide multiple economic, social and environmental benefits to local communities. The Trust are developing a framework to measure the benefits of waterways. Efforts to enhance pedestrian and cycling connectivity, as stated in the policy text, could help realise these benefits to a greater extent within the district. Sometimes it is not clear to developers and decision makers that green corridors can also refer to blue spaces (i.e., waterways). Reference to green and blue infrastructure, as opposed to just green, could help to limit potential for this confusion.	The introductory text to Policy N3 explains that Green Infrastructure includes blue infrastructure such as river corridors, ponds and canals.
DLP12	Sylvia Whittingham	Environment Agency	Suggest a new criterion 8 regarding the restoration of heavily canalised, culverted waterbodies, amendment of redundant weirs and other ways to offer opportunities for water quality, biodiversity enhancement and flood risk reduction. Suggested text provided.	Criterion 3 and the Reasoned Justification to Policy N3 has included some of the recommended policy text and references PfE which includes policies on water quality. Text has not been included on SUDS as this is already covered by PfE Policy JP-S4 and Local Plan Policies CC3 and CC4.
DLP14	Zoe Haystead	Natural England	Supports enhancing green infrastructure within the borough and the links made to ecological networks including policies N1, N2, N4 and IN2. May also wish to consider links to PO8 Uplifting the Health and Well-Being of Our Residents and Local Communities and Policy TM1 in light of greenspace provision and contribution in light of mitigation measures made within PfE Policies JP-G9 and JP-G5.	Support noted. Policy TM1 and the linkages box has now been deleted, however.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP32	Martyn Walker	Lancashire Wildlife Trust	Agree with and support the use of GI in providing a nature-based solution to climate change in paragraph 15.24. Agree with and support policy approach. Stress that the provision of new GI within developments will be essential in ensuring that existing GI sites are not overburdened and become degraded through overuse. Welcome the approach for additionality in paragraph 15.34.	Support noted.
DLP34	Pauline Shearer	Sport England	Policy should include reference to Sport England's Active Design Principles in creating a high quality, accessible and equitable active environment.	Reference to the Active Design Principles has been added to the Reasoned Justification.
DLP41	Brian O'Connor	Lichfields on behalf of Russell LPD	Supports the ambition to enhance green infrastructure. Part 7 of Policy N3 states that development should aim for 20% tree cover, taking account of the retention of existing trees and the future canopy growth of trees to be planted as part of the landscape for the site. The draft policy's reasoned justification indicates that the 20% figure has been guided by the Institute of Chartered Foresters' Canopy Cover of England's Towns and Cities guidance. Support the ambition of Policy N3 to increase tree coverage across the borough. However, we note that there is already a policy in PfE (Policy JP-G7) that requires the replacement of trees lost to development at a 2:1 ratio. This is a much more consistent approach to ensuring development increases tree coverage. The 20% tree coverage target included in draft Policy N3 would have a significantly different impact on a development site where there is only 1% tree coverage, as opposed to a site that already has 20% tree coverage. For consistency with PfE, recommend that the 20% blanket target	Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4. It is felt important to address increasing tree coverage separate from tree replacement, which is mitigation.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			in Policy N3 is replaced with the 2:1 replacement ratio.	
DLP49	Olivia Carr	Turleys on behalf of Northstone	<p>Support the principle and intention of the policy. However, point seven states that “developments must aim for 20% tree cover, taking account of the retention of existing trees and the future canopy growth of trees to be planted as part of the landscape for the site.” This requirement is unclear and ambiguous, such that it does not comply with paragraph 16(d) of the NPPF. There is no guidance or further explanation on the degree to what is an acceptable level of tree cover if 20% is not possible.</p> <p>It is understood that this requirement has been derived from the Oldham Green Infrastructure Strategy, however, it is not clear what the 20% figure is of – is this net developable area of the site, or of the total amount of public open space etc. There is also no link made between this and the BNG requirements. It will be important that this does not contradict or compromise the ability to achieve BNG or the type of habitats required to achieve this.</p>	Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.
DLP52	Andrew Bradshaw	CRE8 land & Planning	Support the policy.	Support noted.
DLP61	Andrew Leyssens	United Utilities	The evaluation of surface water management opportunities should be undertaken early in the design process. Imperative that the approach to design including site analysis is intrinsically linked to making space for water. Sustainable surface water management will be particularly important to consider in the context of the requirement for new streets to be tree lined. It is a national policy	Some of the requested text has been added to the Reasoned Justification of Policy N3.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			requirement that new streets are tree lined as stated in paragraph 136 within the NPPF. Recommend some suggested wording for inclusion within the policy on this matter. Any approach to planting new trees must also give due consideration to the impact on utility services noting the implications that can arise as a result of planting too close to utility services. Trees should not be planted directly over water and wastewater assets or where excavation onto the asset would require removal of the tree. Therefore, recommend some suggested wording for inclusion within the policy on this matter.	
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	Do not believe that the requirements under the policy in relation to aiming for 20% canopy cover are compliant with the NPPF.	Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.
DLP72	Adam Johnson	National Highways	This the policy is in line with DfT Circular 01/2022 as integration of green infrastructure may reduce car use, which will not only benefit the environment but also reduce the number of vehicles looking to utilise the SRN.	Support noted.
DLP42	Nick Reeves	Kirklees Council	Support any policies in the Oldham Local Plan which will protect and enhance GI networks that extend into Kirklees.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP23	Joanne Harding	Home Builders Federation	There is no justification or evidence for encouraging food production. Concerned in relation to the implications of this policy in terms of viability, efficient use of land and site layouts. Not sure whether residents of all new developments would want community allotments or food growing opportunities, and it is not clear what would happen where these facilities are not used in an appropriate manner or are not maintained for food growing. This part of the policy should be deleted. Also concerned in relation to the aim for 20% tree cover, this has significant implications in relation to site densities, sites layouts, highways, ongoing maintenance, and the viability of development. It also not clear how this policy's aim related to Policy N4. This part of the policy should be deleted.	The Green Infrastructure Strategy provides the justification for the inclusion of the criterion and recommends using Green Infrastructure for food supply where possible as part of the recommended policy approach (see page 132 of Green Infrastructure Strategy). In addition, increased opportunities for local food growing are an action within the LNRS. However, the word 'provide' has been replaced with 'facilitate' to put less of a requirement on the developer whilst ensuring that such space can be considered within the site layout. The introductory sentence states 'where appropriate'. Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.

Table N4: Responses submitted on Policy N4 Tree Replacement

This policy has been renamed to 'Trees' in the Publication Plan.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	The tree replacement ratios used have potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments, this in itself has potential to have a significant impact on the viability of developments. The tree replacement ratio may also have implications in relation to highway provision and highway maintenance and again may need to be given further consideration by the council and the developers of these sites.	Avoiding tree loss, particularly mature trees, in the first instance is part of the mitigation hierarchy and sites should be designated to retain trees. The Publication Plan is supported by a viability appraisal. The ratios have been used elsewhere including by Bristol City Council and Eastleigh Council. The Reasoned Justification has been amended to make clear that highways may also be consulted on the locations and species of trees.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Agree with and support the approach to tree replacement. The policy emphasises that simply replacing a larger tree with a small whip is not a like for like replacement. Agree with and welcome that the species and location for tree planting should be appropriate (paragraph 15.48). Care needs to be taken so as to not adversely affect open country species, in particular ground nesting birds such as Lapwing and Skylark.	Support Noted. The policies on nature will ensure that the GM Local Nature Recovery Strategy is taken into account which has actions to benefit target species including skylark and lapwing.
DLP39	Alan Chorlton		The policy is too overly prescriptive and will result in unnecessary delays in determining and submitting applications.	The policy provides a consistent and transparent approach to addressing tree replacement. Council officers will be able to provide comments when considering development proposals.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP49	Olivia Carr	Turleys on behalf of Northstone	Agree to the principle of securing replacement tree planting where the removal of trees has been deemed necessary to facilitate a proposed development. However, consider that Table N1 is overly prescriptive and not supported by any technical evidence or policy basis. The first sentence of the policy states that such a fixed number system "has been used elsewhere"; however, the policy or supporting text does not confirm where this has been used and therefore an assessment cannot be made as to whether this system is appropriate. Until such time that this approach can be justified, suggest this policy is amended to remove the approach to replacement tree planting through Table N1.	The policy provides a consistent and transparent approach, which is not considered to be too prescriptive. The rations have been used elsewhere including by Bristol City Council and Eastleigh Council. The evidence supporting the approach is outlined in the Addressing the Biodiversity Emergency Topic Paper.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	Tree coverage and appropriate species should be used to aid with flood mitigation as well as to ensure that appropriate planting is undertaken in residential areas. Each district should have a tree-planting 'wish list' in place to aid with bids to 'City of Trees' and other initiatives which deliver more tree-planting and biodiversity impact.	Comments noted.
DLP23	Joanne Harding	Home Builders Federation	Consider that the tree replacement ratios used have potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments, this in itself has potential to have a significant impact on the viability of developments. The replacement ratio may also have implications in relation to highway provision and maintenance and again may need to be given further consideration by the council and the developers of these sites.	Avoiding tree loss, particularly mature trees, in the first instance is part of the mitigation hierarchy and sites should be designated to retain trees. The Publication Plan is supported by a viability appraisal. The rations have been used elsewhere including by Bristol City Council and Eastleigh Council. The Reasoned Justification has been amended to make

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				clear that highways may also be consulted on the locations and species of trees.

14. Responses submitted on the Historic Environment Policies

Table HE1: Responses submitted on Policy HE1 The Historic Environment

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Reference source of the information on the Mills and the Conservation Area at paragraphs 16.3 and 16.4.	Footnotes have been added to these paragraphs to reference evidence sources.
DLP16	Sally Hulse		Support the policy, ensure all historic buildings in remain.	Support noted.
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	Requests clause 7, in relation to the implementation of the Mills Strategy, be removed, unless and until a further update to the Mills Strategy is completed in order to address concerns with policy HE4.	Clause not removed. The Mills Strategy was subject to targeted consultation and responses were reviewed. The implementation of the strategy includes more than considering what priority a mill has been given. It includes factors such as looking at funding streams to support conversions; engagement with landowners to support mill specific strategies and a marketing strategy. There is no reason why a positive strategy should not be implemented.
DLP70	Peter Rowlinson	Chadderton Together	Chadderton Together has secured an approval to apply for £2.2m from Heritage Lottery for the restoration of Foxdenton Hall and Park. The allocation of the adjoining land for employment will create an inappropriate environment for the hall and park.	Comment not applicable to policy wording.
DLP40	Jackie Copley	CPRE	The Local Plan should support the local authorities to deliver beauty and protect and enhance the important heritage assets around Oldham. The Local Plan should protect and	Comment noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			enhance historic strengths in the place-making of the future, and this includes the area's social history, particularly rural.	
DLP57	Julie Ball		Reopen the Coliseum building with new management instead of building a new building. Make use of an already good space.	Comment regarding Coliseum noted. No specific amendments to policy requested.

Table HE2: Responses submitted on Policy HE2 Securing the Preservation and Enhancement of Oldham's Heritage Assets

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Rather than 'development will be permitted' it should say 'development will be supported'. This is because not all development will be 'permitted' but will be supported if they accompany it with the said information. Insert details of the 'At Risk' Register at paragraph 16.53.	Policy amended to say development will be supported. A footnote linking to the latest at-risk register has been added to the Reasoned Justification of Policy HE2.
DLP16	Sally Hulse		Support the policy, should ensure all historic buildings in remain.	Support noted.

Table HE3: Responses submitted on Policy HE3 Development Proposals Affecting Conservation Areas

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy.	Support noted.
DLP16	Sally Hulse		Support the policy, should ensure all historic buildings in remain.	Support noted.
DLP39	Alan Chorlton		The detail in the policy is welcomed.	Support noted.

Table HE4: Responses submitted on Policy HE4 Oldham's Mills

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy subject to an amendment. Insert the word 'public' before benefits in the second to last line of the section on high priority mills.	'Public' has been inserted under 'High Priority Mills' to read 'where the public benefits of the development would outweigh the harm'.
DLP16	Sally Hulse		Support the policy, ensure all historic buildings in remain.	Support noted.
DLP39	Alan Chorlton		Support the policy.	Support noted.
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	Questions inconsistencies with the scoring of Marlborough Mill in the Mills Strategy and sets out the reasons why. Requests that the Mill Strategy is revisited.	Targeted consultation was carried out on the Mills Strategy, which CBRE responded to, albeit not concerning Marlborough Mill. The Mills Strategy sets out the methodology and was developed in partnership with Historic England. The Mills Strategy and Policy HE4 provides a policy framework to help assess planning proposals affecting non-designated mills. Applicants can provide evidence as part of a planning application to justify any difference to the level of significance afforded to a mill.
DP68	Jon Phipps	Lathams on behalf of Whiteoak Ltd (Purico)	Greenfield Mill (Fletchers) should be categorised as a Low Priority Mill. The detailed heritage assessment identifies three buildings which have some heritage significance and which are worthy of retention. The main industrial buildings have little or no heritage value. PfE JPA 15 endorses	Greenfield Mill has been removed from the policy in response to the demolition of most of the mill complex.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			this approach and accepts the loss of all existing buildings with the exception of the three identified as having clear heritage significance.	

Table HE5: Responses submitted on Policy HE5 Canals

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy, subject to an amendment. There are designated (and maybe undesignated) heritage assets on the canals which should be mentioned here. Insert reference to 'heritage assets (designated and undesignated)'.	Amendment done as requested.
DLP11	Simon Tucker	Canals and River Trust	The identification of our canals as non-designated heritage assets this within Policy HE5 is welcomed. The policy wording appears comprehensive and would help to ensure that development will take account of the heritage value of our canals. This will make the Local Plan more effective in meeting the overarching aims of paragraphs 196 and 209 of the NPPF.	Support noted.
DLP14	Zoe Haystead	Natural England	Natural England supports this policy with recognition of Rochdale Canal SAC and SSSI, green infrastructure and access to nature opportunities.	Support noted.
DLP16	Sally Hulse		Support the policy, ensure all historic buildings in remain.	Support noted.
DLP32	Martyn Walker	Lancashire Wildlife Trust	In general agreement and support for the policy, consideration of ecological assets will need to be taken into account in any improvement proposals. Welcome the acknowledgement in paragraph 16.50 that canals have an important function in, and contribution to, ecological networks.	Support noted. The plan needs to be read as a whole. It is considered that other policies within the Local Plan address this point.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP42	Nick Reeves	Kirklees Council	Support the policies that will protect, enhance and promote the Huddersfield Narrow Canal along its full course.	Support noted.

15. Responses submitted on the Creating a Better and Beautiful Oldham Policies

Table D1: Responses submitted on Policy D1 A Design-Led Approach for Residential and Residential-Led Mixed Use Development

This policy has been renamed to 'Achieving High Quality Design' in the Publication Plan.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy.	Support noted.
DLP4	Hyacynth Cabiles	NHS Property Services	Supports the inclusion of a design standard for new developments within the policy but recommend the inclusion of the principles of healthy design to ensure new developments also promote healthier lifestyles and overall, improve health and wellbeing of the local community. Recommend the inclusion of a comprehensive policy on health and wellbeing in the Local Plan and encourage the council to engage with the NHS on this matter. Specific policy requirements to promote healthy developments suggested, including; considering local health outcomes, and where appropriate to the local context and/or size of the scheme include a Health Impact Assessment, encouraging active travel, access to healthy foods, encourages social interaction, be resilient and adaptable to climate change, consider the impacts of pollution, respecting the context and heritage of the surrounding area, providing the necessary mix of housing types and providing sufficient and high quality green and blue spaces within developments.	Comment noted. Policy D1 amended to include a criteria that says, 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy CO6 'New Development and Health' has been rewritten and now includes details on circumstances when new health facilities will be supported and where the loss of health facilities will be supported.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP8	Tom Wignall	National Gas Transmission (Avison Young)	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets. To ensure this policy is consistent with national policy we would request the inclusion of a policy bullet point that references site constraints such as utilities. Suggested wording provided.	Comment noted. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through their design: adopt a comprehensive and co-ordinated approach to development, respecting existing site constraints including utilities situated within, and running through, the site'.
DLP11	Simon Tucker	Canals and River Trust	Existing walking and cycling routes, including our towpaths, should be integrated into the wider active travel network. Within part 2 of the policy, consider that the policy could be made more effective by referring to integrating existing routes into new development.	Comment noted. Criteria two of the policy states that development proposals should through their design, 'encourage and facilitate active travel with convenient, safe and inclusive pedestrian and cycling routes', this will include canal towpaths.
DLP13	Tom Wignall	National Grid (Avison Young)	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET. NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets. To ensure this policy is consistent with national policy	Comment noted. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through their design: adopt a comprehensive and co-ordinated approach to development, respecting existing site constraints including utilities situated within, and running through, the site'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			we would request the inclusion of a policy bullet point that references site constraints such as utilities. Suggested wording provided.	
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support the policy. Agree with and welcome the acknowledgement that nature can play an important part in people's lives. Support a place-making guide and design code as set out in paragraph 17.4. Recommend including reference the Building with Nature project so that nature can be interwoven into the fabric of Oldham's infrastructure.	Support noted. Building with Nature project referenced in Reasoned Justification.
DLP34	Pauline Shearer	Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles. The policies should include requirements for development that will create active environments – currently this is not promoted other than D6 which incorporates some elements of Active Design.	Comment noted. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also makes reference to Sport England's Active Design principles, and the Local Plan should be read as a whole.
DLP39	Alan Chorlton		Policy is welcomed.	Support noted.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Supports the policy.	Support noted.
DLP52	Andrew Bradshaw	CRE8 land & Planning	Support the policy.	Support noted.
DLP61	Andrew Leyssens	United Utilities	Recommend some suggested wording for inclusion within the policy on development proposals linking to opportunities to manage surface water and reduce flood risk.	Comment noted. Suggested wording has not been included as opportunities for managing surface water and reducing flood risk are covered by Local Plan Policies CC2 and CC3. The Local Plan should be read as a whole.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP71	Richard Clowes	TfGM	Support the policy, paragraph 17.15 states "The design and layout of development should reduce the dominance of cars" yet there is nothing specifically in policy D1 to help achieve this.	Comment noted. Criteria two of the policy states that development proposals should through their design, 'encourage and facilitate active travel with convenient, safe and inclusive pedestrian and cycling routes'. In addition, the Local Plan should be read as a whole and the 'A Sustainable, Active, Accessible Network for Oldham' chapter includes policies that will help to reduce the dominance of cars.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as it supports a vision-led approach. It is important that National Highways are consulted from early plan-making stages to ensure that the design takes into account any infrastructure that could reduce impacts on the SRN.	Support noted.

Table D2: Responses submitted on Policy D2 A Design-Led Approach to Non-Residential, Commercial and Employment Developments

This policy has been incorporated into Policy D1 to avoid repetition.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy.	Support noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP13	Tom Wignall	National Grid (Avison Young)	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET. NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets. To ensure this policy is consistent with national policy we would request the inclusion of a policy bullet point that references site constraints such as utilities. Suggested wording provided.	Support noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through their design: adopt a comprehensive and co-ordinated approach to development, respecting existing site constraints including utilities situated within, and running through, the site'.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support the policy.	Support noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition.
DLP34	Pauline Shearer	Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles. The policies should include requirements for development that will create active environments – currently this is not promoted other than D6 which incorporates some elements of Active Design.	Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Policy D1 has been amended to include a criterion that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also makes reference to Sport England's Active Design principles and the Local Plan should be read as a whole.
DLP39	Alan Chorlton		Policy is welcomed.	Support noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP41	Brian O'Connor	Lichfields on behalf of Russell LPD	<p>This policy requirement should not be placed on the strategic employment allocations which have been released through the PfE. The employment site at Stakehill has been allocated through the PfE to meet strategic large-scale employment needs for the city region and a policy requirement in the Oldham Local Plan should not seek to restrict the nature and form of this development. A requirement to reduce the scale of bulky buildings on a strategic allocation is fundamentally flawed and will compromise the future delivery of the site. The massing of large-scale buildings can be broken down through appropriate design related mitigation but this should suffice rather than reducing the scale of the building itself. This policy will inadvertently negatively impact the future development of the Stakehill Industrial Estate extension and should be deleted. Recommend that part 3 of Policy D2 is deleted, or its explanatory text should clarify that this part of the policy does not apply to strategic PfE allocations such as Stakehill.</p>	<p>Comment noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. The requirement to reduce the scale of bulky buildings and bland elevations by breaking down building mass has been deleted.</p>
DLP61	Andrew Leyssens	United Utilities	<p>Recommend some suggested wording for inclusion within the policy on development proposals linking to opportunities to manage surface water and reduce flood risk.</p>	<p>Comment noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Suggested wording has not been included as opportunities for managing surface water and reducing flood risk are covered by Local Plan Policies CC2 and CC3. The Local Plan should be read as a whole.</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as it supports a vision-led approach and will ensure that active travel and public transport modes are supported, which will reduce vehicles on the SRN. It is important that National Highways are consulted from early plan-making stages to ensure that the design takes into account any infrastructure that could reduce impacts on the SRN.	Support noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition.
DLP8	Tom Wignall	National Gas Transmission (Avison Young)	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets. To ensure this policy is consistent with national policy we would request the inclusion of a policy bullet point that references site constraints such as utilities - suggested wording provided.	Comment noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition. Policy D1 amended to include a criterion that says, 'Development proposals, where applicable, should through their design: adopt a comprehensive and co-ordinated approach to development, respecting existing site constraints including utilities situated within, and running through, the site'.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted. Draft Local Plan Policy D2 has now been incorporated into Policy D1 to avoid repetition.

Table D3: Responses submitted on Policy D3 Design Scrutiny

This policy has been removed with reference to Design Scrutiny instead incorporated into Policy D1.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Unclear what a 'major development in a conservation area' is and how this is defined. Is this the definition used by Historic England or that which is the council's own definition? This needs to be clarified and amended as it is not clear how this policy should be applied.	Support noted. Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.' Reference to 'major development' is no longer included.
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	Supportive of the use of Design Review in general, however it is important that this tool is used appropriately and in a proportionate manner. Design Review can be a tool to promote good design and an efficient way to improve quality. However, they need to be well managed. It is important that Design Review is undertaken at the right time, and that feedback provided is constructive and sufficiently detailed, and an appropriate planning balance is sought to ensure that all policy requirements can be met not just those in relation to design, and to ensure that the applicant is fully engaged in the process.	Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.' This will allow for design reviews to be carried out appropriately and proportionately.
DLP23	Joanne Harding	Home Builders Federation	Generally supportive of the use of Design Review, but it will be important that this tool is used appropriately and in a proportionate manner. If they are well managed, they can provide high quality design advice that can add value to the places in which they are built. Consider that it will be important that any design review is undertaken	Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.'

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			at the right time, that any feedback provided is constructive and sufficiently detailed, that an appropriate planning balance is sought to ensure that all policy requirements can be met not just those in relation to design, and to ensure that the applicant is fully engaged in the process.	This will allow for design reviews to be carried out appropriately and proportionately.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support the policy.	Support noted. Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.'
DLP39	Alan Chorlton		Policy is welcomed.	Support noted. Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.'
DLP49	Olivia Carr	Turleys on behalf of Northstone	Support the policy and the intention behind it to ensure that good design is considered at the outset.	Support noted. Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.'

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP34	Pauline Shearer	Sport England	Support the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles. The policies should include requirements for development that will create active environments – currently this is not promoted other than D6 which incorporates some elements of Active Design.	Support noted. Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has been amended to include a criteria that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also makes reference to Sport England's Active Design principles and the Local Plan should be read as a whole.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted. Draft Plan Policy D3 'Design Scrutiny' has been deleted. Policy D1 has had the following text added to it, 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.'

Table D4: Responses submitted on Policy D4 Creating Better Views, Gateways and Taller Buildings

This policy has been removed with reference to Tall Buildings instead incorporated into Policy D1.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Object to Policy D4 as written. The policy appears to be a mix of location and written expectations for planning permission for taller buildings, views and gateway buildings. There are several questions which the council needs to consider for this policy: Is there a need for the policy that is not covered by the rest of the Plan? Has the council commissioned tall building, gateway and view	Comment noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted. Policy D1 has been amended to include three criteria concerned with what development proposals involving tall buildings are required to demonstrate

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			<p>work to support the policy? If not, how can the policy suggest locations that are appropriate for such proposals? How can this policy suggest suitable locations that are not within the allocations? What is 'sympathetic' development?</p> <p>If policy is to be maintained, then it should be strictly about what needs to be submitted with an application.</p>	rather than stipulating where they should be located.
DLP11	Simon Tucker	Canals and River Trust	Tall buildings in proximity to our waterways can result in shading issues, which can result in harm to the user experience along our network, and also could impact the biodiversity or our canals. This is pertinent in Oldham, where our canals benefit from SAC and SSSI designations. The policy text should refer to an assessment of shading effects on the wider environment, including over waterspaces, to help ensure that this matter is fully assessed and taken into account by decision makers and applicants.	Comment noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted. Policy D1 has been amended to include three criteria concerned with what development proposals involving tall buildings are required to demonstrate including that they should, 'not unduly affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing and shading, noise, reflected glare, aviation, navigation and telecommunication interference'.
DLP39	Alan Chorlton		Policy is welcomed.	Support noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted.
DLP55	Natalie Belford	Manchester Airport	Attention should be drawn to the potential for tall buildings to cause an air navigation obstacle or interference to radar and other navigation aids. Certain tall building proposals will require specialist technical safeguarding assessments to determine whether the proposal would have any impact upon aircraft operations and air traffic	Comment noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted. Policy D1 has been amended to include three criteria concerned with what development proposals involving tall buildings are required to demonstrate

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			control procedures. In accordance with Circular 1/2003, proposals for tall buildings that exceed the height indicated on Manchester Airport's Safeguarding Map, must be referred to the Airport as statutory consultee. Advise inserting additional text to state that tall building proposals that adversely impact on aircraft safety will not be permitted.	including that they should, 'not unduly affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing and shading, noise, reflected glare, aviation, navigation and telecommunication interference'.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as the location of taller buildings with good public transport accessibility and connectivity may reduce car use, which will not only benefit the environment but also reduce the number of vehicles looking to utilise the SRN.	Support noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted.
DLP34	Pauline Shearer	Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles. The policies should include requirements for development that will create active environments – currently this is not promoted other than D6 which incorporates some elements of Active Design.	Support noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted. Policy D1 has been amended to include a criteria that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also makes reference to Sport England's Active Design principles and the Local Plan should be read as a whole.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted. Draft Plan Policy D4 'Creating Better Views, Gateways and Taller Buildings' has been deleted.

Table D5: Responses submitted on Policy D5 Improving the Quality of Advertisements and Signage in Oldham

This policy has been renamed and renumbered to 'Advertisements, Signage and Shop Fronts' and is now Policy D2.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Support the policy.	Support noted.
DLP34	Pauline Shearer	Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles. The policies should include requirements for development that will create active environments – currently this is not promoted other than D6 which incorporates some elements of Active Design.	Support noted. No amendment made to this policy. Policy D1 has been amended to include a criteria that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also makes reference to Sport England's Active Design principles and the Local Plan should be read as a whole.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table D6: Responses submitted on Policy D6 Creating a Better Public Realm in Oldham

In the Publication Plan this policy has been renumbered and is now Policy D3.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	Natural England support the preference for active and public transport. Transport proposals, including walking and cycling, should link with policies on GI and ecological networks to support access to nature. Transport proposals offer opportunities to create new habitats/connect habitats, e.g., railway embankments and highway verges.	Comment noted. The policy has been amended to include the following two criteria, 'Development proposals that include the creation of new public realm should, where applicable: support biodiversity, and integrate green infrastructure and surface water management in line with policy N3; and prioritise active travel through providing safe, legible and well-connected routes

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				whilst discouraging travel by car and excessive on-street car parking'.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support the policy. Suggest that where open spaces are located within the public realm, they should be designed to mirror and reflect the local landscape.	Comment noted. The policy has been amended to include the following two criteria, 'Development proposals that include the creation of new public realm should, where applicable: support biodiversity, and integrate green infrastructure and surface water management in line with policy N3; and prioritise active travel through providing safe, legible and well-connected routes whilst discouraging travel by car and excessive on-street car parking'.
DLP61	Andrew Leyssens	United Utilities	Request suggested policy wording is included regarding new public realm and surface water management.	Comment noted. The policy has been amended to include a criteria that says 'Development proposals that include the creation of new public realm should, where applicable: support biodiversity, and integrate green infrastructure and surface water management in line with policy N3'.
DLP71	Richard Clowes	TfGM	Support the policy, paragraph 17.44 could refer to the Street for All Design Guidance and also LTN1/20 for cycle infrastructure design.	Support noted. Streets for All is referenced in the Reasoned Justification.

Table D7: Responses submitted on Policy D7 Development within the curtilage of a dwellinghouse

In the Publication Plan this policy has been renamed and renumbered to 'Extensions and alterations to, and development within the curtilage of a dwellinghouse' and is now Policy D4.

	Name	Organisation	Summary of Comments	
DLP3	Emily Hycran	Historic England	It is 'significance' that should be considered. Not the value of a heritage asset. Amend wording.	Comment noted. The policy has been rewritten and the criterion relating to heritage assets has been removed.
DLP61	Andrew Leyssens	United Utilities	Request that this policy includes an additional criteria (wording suggested) regarding the implementation of sustainable surface water management. This is critical to minimise the impacts of urban creep on existing drainage systems.	Comment noted. The policy has been amended to include a criteria that says extension or alteration to an existing dwelling, or the construction of an ancillary outbuilding, structure, boundary treatment or hardstanding within the residential curtilage, will be supported where: 'there is the implementation of sustainable surface water management by directing surface water to a permeable surface or an infiltration system wherever possible'.
DLP34	Pauline Shearer	Sport England	Supports the reference to use of Design Codes and the preparation of The Oldham Code. Would like to see reference to Active Design Guidance and its aims in the introductory text, through design, to create active environments to encourage healthier lifestyles. The policies should include requirements for development that will create active environments – currently this is not promoted other than D6 which incorporates some elements of Active Design.	Support noted. Policy D1 has been amended to include a criteria that says 'Development proposals, where applicable, should through their design: promote health and well-being through active design'. In addition, Policy T1 also makes reference to Sport England's Active Design principles and the Local Plan should be read as a whole.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

16. Responses submitted on the Creating a Sustainable, Active, Accessible Network for Oldham Policies

Table T1: Responses submitted on Policy T1 Delivering Oldham's Transport Priorities

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP11	Simon Tucker	Canals and River Trust	Highlight that off-site improvements to existing walking and cycling routes may be required in some cases, so as to maximise opportunities for walking and cycling. For example, the Trust maintain our towpath network to a 'steady state' based on existing use. Additional use of our towpaths brought by new development may require improvements to the surface so as to minimise risks of erosion, and to encourage use by new users. Request that reference should be given in the policy towards offsite improvements to walking and cycling infrastructure that may be necessary to accommodate the needs of users.	Policy T1 has been amended to say, 'The Council will seek developer contributions, where appropriate, towards the provision or enhancement of highway, public transport and / or active travel schemes.' This could include offsite improvements to walking and cycling.
DLP14	Zoe Haystead	Natural England	Welcome the link to PfE Policy JP-C7. However, may wish to include specific reference to the requirement of screening all transport assessments for all allocated development policies (specifically more than 100 vehicles or 20 HGVs which may pass Holcroft Moss SSSI along the M62) for clarity. Natural England wish to highlight that financial contributions will be required at all allocations linked to Policy H13 Housing and Mixed-Use Allocations and Policy E1 – Business and Employment Areas whereby a transport assessment has been produced. These allocations will need to consider Manchester Mosses SAC (specifically the Holcroft Moss SSSI component) in accordance with PfE Policy JP-G9	Comments noted. Policy T5 has been amended to say, 'Any developments that are required to be accompanied by a Transport Assessment will need to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC) in accordance with Policy JP-C8 of PfE'. The Local Plan no longer includes allocations.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			and JP-C7. We suggest links are made within Policy IN2 – Planning Obligations, Policy H13 Housing and Mixed-Use Allocations and Policy E1 – Business and Employment Areas.	
DLP33	Sarah Welsh	Peak District National Park	It is important that the rural parts of Oldham, and in particular the onward links into the National Park, are not neglected. It is important opportunities for sustainable travel into the National Park are also available as the benefits of access for Greater Manchester's population in health and wellbeing are well recognised. There should be opportunities for these journeys by active travel and public transport. It should be made clear that within that part of Oldham that falls within the National Park, the PDNPA parking standards apply.	Policy T1 has been amended to say, 'The Local Plan will support the delivery of Oldham's Transport Strategy by ensuring that new development: Prioritises and promotes active travel to key points of interest by integrating Active Design principles into their design'. The introduction to the Local Plan sets out that the Plan covers the whole borough except that part which falls within the Peak District National Park (PDNP), amendment not considered necessary in T1.
DLP34	Pauline Shearer	Sport England	Would encourage Active Design Guidance being referenced within this section. This policy broadly supports the principles of Active Design.	Comment noted. Policy T1 has been amended to say 'The Local Plan will support the delivery of Oldham's Transport Strategy by ensuring that new development: Prioritises and promotes active travel to key points of interest by integrating Active Design principles into their design.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP41	Brian O'Connor	Lichfields on behalf of Russell LPD	Given the scale of the strategic employment sites, the policy should introduce more flexibility for a phased approach to the delivery of transport infrastructure as it may not be possible for a multitude of reasons. PfE Appendix D sets out the indicative transport mitigation associated with each of the PfE allocations. Given that extensive work has been undertaken to understand the transport mitigation required for each PfE allocation, it should be referenced under Policy T1. Cross reference to the PfE allocations, and their associated transport mitigation measures, would clarify that the appropriate highways mitigation for Stakehill has already been determined, and that additional mitigation measures beyond those agreed should not be requested.	The Local Plan must be read as whole and together with PfE, it is not considered necessary to make an amendment to Policy T1 to clarify work done as part of PfE.
DLP42	Nick Reeves	Kirklees Council	Support the policy as the Transpennine Route Upgrade is an important project that will support future growth aspirations in Kirklees and the wider Leeds City Region. The provision of a new railway station at Diggle could also enable more sustainable travel patterns between Oldham and Kirklees.	Support noted.
DLP50	Rebecca Dennis	Pegasus on behalf of Mr & Mrs P.D. Martin	The policy says that new development should reduce road casualties, improve highways safety and address traffic congestion. Take issue with this part of the policy since the requirements are more onerous than the requirements of national policy, and as such it is not consistent with national policy.	Policy T1 amended to remove reference to 'improve highway safety and address traffic congestion'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP55	Natalie Belford	Manchester Airport	PfE recognises Manchester Airport as a key factor in realising the wider growth agenda for the North and unlocking the economic potential of the region, and that to maximise the Airport's contribution to the growth agenda it must be well-connected to the key towns and cities that it serves. Encourage the council consider the economic and transport links with Manchester Airport, and the benefits these afford. Opportunities for improving transport links and connectivity between Oldham and Manchester Airport could also be explored.	Policy T1 amended to say, 'To support Oldham's role in the Greater Manchester economy, measures will be supported where they: Help improve connectivity and accessibility from Oldham to the key growth locations identified in PfE'. This is then footnoted to say, 'Policies JP-Strat1 to JP-Strat12 in PfE set out the key growth locations in Greater Manchester'. Manchester Airport is one of these locations as set out in PfE Policy JP-Strat10.
DLP71	Richard Clowes	TfGM	Support the policy. Paragraph 18.6 refers to TfGM working on Streets for All Strategy. This has now been completed. Policy refers to TfGM's Streets for All Design Guidance, unfortunately because the Design Guidance does not form part of the Oldham Local Plan it is our understanding that it is not appropriate to require policy criterion to "be in accordance with the Streets for All Design Guidance". It should be referred to in the Reasoned Justification and the sentiments of the Design Guidance expressed in the policies or alternatively specific requirements in the Design Guidance could be written into the policies.	Support noted. Reference to Streets for All moved from Policy T1 into the Reasoned Justification.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as the policy will prioritise walking and cycling as well as maintaining and improving the PRoW network and seek to deliver a co-ordinated approach to improve highway safety, amongst others. Any development bringing forward improvements that may impact the SRN should involve National	Support noted. Reference added to T1 to say, 'Any development that may impact the Strategic Road Network (SRN) should involve National Highways at the earliest opportunity'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			Highways at the earliest opportunity to ensure that interventions benefit not only the local highway network but the SRN.	
DLP7	Michael Gradwill	Network Rail	The Trans Pennine Route is due to take place and a number of site-specific interventions will be needed. Network Rail should be consulted on all applications that affect level crossings.	Comment noted.
DLP58	Alison Shore		General comment regarding Sholver and how it has been poorly served by public transport and how it could be linked better to the Shaw Metrolink stop if connections were made better. Request charging points for electric bikes and a Local Link service.	Comment noted. The Local Plan, Plan Objective 10 is, 'Promoting accessible and sustainable transport choices, by: improving public transport connectivity for Oldham's residents to key areas of employment within the borough, the city region and beyond'.

Table T2: Responses submitted on Policy T2 Creating Sustainable Streets

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP34	Pauline Shearer	Sport England	Would encourage Active Design Guidance being referenced within this section. This policy broadly supports the principles of Active Design.	This policy has now been deleted as it was considered to replicate PfE Policy JP-C5: Streets for All.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Supports draft policy and the requirement for highway infrastructure to be designed in accordance with the prescribed transport hierarchy. In addition, support points a – f in the policy.	This policy has now been deleted as it was considered to replicate PfE Policy JP-C5: Streets for All.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP52	Andrew Bradshaw	CRE8 land & Planning	Support the policy.	This policy has now been deleted as it was considered to replicate PfE Policy JP-C5: Streets for All.
DLP71	Richard Clowes	TfGM	Support the policy. It refers to TfGM's Streets for All Design Guidance, unfortunately because the Design Guidance does not form part of the Oldham Local Plan it is our understanding that it is not appropriate to require policy criterion to "be in accordance with the Streets for All Design Guidance". It should be referred to in the Reasoned Justification and the sentiments of the Design Guidance expressed in the policies or alternatively specific requirements in the Design Guidance could be written into the policies.	This policy has now been deleted as it was considered to replicate PfE Policy JP-C5: Streets for All.
DLP72	Adam Johnson	National Highways	This policy aligns with DfT Circular 01/2022 as the hierarchy prioritises active travel and public transport users. This will not only benefit the environment but also reduce the number of vehicles looking to utilise the SRN.	This policy has now been deleted as it was considered to replicate PfE Policy JP-C5: Streets for All.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	The council should look beyond 'road parallel' investment in cycle and walkways, other routes exist which could be utilised to draw pedestrian and cycle routes away from roads and ease congestion. Often, routes such as canal and waterway routes and rail and tram lines, are more direct for walking and cycling. Investment should be made to make such routes viable. 'School Streets' schemes are proven to cut down on vehicle congestion outside schools, their positive environmental impact is obvious and there is also a strong argument for their expanded use from a health and wellbeing viewpoint. GMCA should	This policy has now been deleted as it was considered to replicate PfE Policy JP-C5: Streets for All.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			explore ways to create central funding streams for the delivery and enforcement of 'school streets'.	
DLP57	Julie Ball		Not enough detail in the plan. Where will the new bus routes be? How will the cycle path network be improved? With Oldham's cycle routes one minute you are on a cycle path and then it might move to the opposite side of the road, then it suddenly disappears. Suggests talking to Southport Council on ideas for a better cycle network.	This policy has now been deleted as it was considered to replicate PfE Policy JP-C5: Streets for All.

Table T3: Responses submitted on Policy T3 Car Parking Standards in Oldham

This policy has been renamed 'Parking provision' in the Publication Plan.

ID No / Ref	Name	Organisation	Summary of Comments	
DLP72	Adam Johnson	National Highways	Welcomed that car parking standards in Oldham will not discourage the use of more sustainable modes of transport, which aligns with National Highways policy.	Support noted.
DLP34	Pauline Shearer	Sport England	Would encourage Active Design Guidance being referenced within this section and would encourage the facilitation of cycle use in parking standards.	Comment noted. Reference to the Active Design Guidance has been added to Policy T1, it is not considered necessary to be added to Policy T3.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	Need to ensure that adequate parking is available for all developments, one space per property is not adequate and causes road safety issues and congestion down the line.	Comment noted.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table T4: Responses submitted on Policy T4 Providing for electric vehicle charging points

This policy has been renamed 'Electric Vehicle Charging Infrastructure' in the Publication Plan.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP23	Joanne Harding	Home Builders Federation	The provision of electric vehicle charging capability is unnecessary as Part S of the Building Regulations now provides the requirements for Electric Vehicle charging, including where exceptions may apply.	As the transition to low-emission transport accelerates, the availability of accessible, safe and well-located charging facilities will be essential to supporting behavioural change and achieving Greater Manchester's decarbonisation and clean air objectives and it is considered a policy on this matter will support this ambition.
DLP71	Richard Clowes	TfGM	Support the policy. Policy requires residential developments with shared parking areas and for non-residential developments, including a minimum of 20% of spaces with active charging facilities, with passive provision for all remaining spaces. For non-residential development this may be challenged unless there is evidence that demonstrates all spaces for non-residential development will need to provide passive provision. This may be difficult to demonstrate given that it is envisaged that a significant amount of EV charging is anticipated to be done at home. It may also not be possible to convert that passive provision into active charging facilities depending on the electricity supply in a particular location. In paragraph 18.21 the changes to Building Regs for non-residential development require lower	Policy T4 in relation to non-residential developments has been amended to better reflect the Building Regulations requirements.

			standards (one charger only is required for non-residential development).	
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as any measures that lead to an improvement in air quality will not only benefit the environment but also reduce the number of vehicles looking to utilise the SRN, particularly as the policy will not allow for additional car parking spaces to be provided to meet the standard.	Support noted.
DLP34	Pauline Shearer	Sport England	Would encourage Active Design Guidance being referenced within this section.	Comment noted. Policy T1 has been amended to say 'The Local Plan will support the delivery of Oldham's Transport Strategy by ensuring that new development: Prioritises and promotes active travel to key points of interest by integrating Active Design principles into their design.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	Provision of electric vehicle charging points must feature more heavily in planning considerations in both residential and commercial settings.	Prioritises and promotes active travel to key points of interest by integrating Active Design principles into their design'. It is not considered necessary to add reference to Policy T4 too.

Table T5: Responses submitted on Policy T5 Transport Statement, Assessments and Travel Plans in New Development

This policy has been renamed 'Vision-led Transport Statements, Transport Assessments and Travel Plans in New Development' in the Publication Plan.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP71	Richard Clowes	TfGM	Support the policy. Paragraph 18.22 It is important to be able to understand the potential public transport mode share of a development when developing a Travel Plan or measures to mitigate the highway impacts or indeed to understand the potential impact of a development on public transport capacity. Therefore Transport Assessments and Statements should include information on all modes of travel including public transport not just vehicle and pedestrian movements. In paragraph 18.23 Highways England have now been renamed National Highways and it is much more likely to be the scope and detail of a TA not a TS. Is paragraph 18.23 when talking about the highways boundary referring to the SRN boundary? If not, then it would be the Local Highways Authority and not National Highways.	Policy T5 has been rewritten and now provides a lot more guidance on what should be included in Travel Assessments and Statements, this includes the requirement to outline how the development will support access by active travel and public transport. Correct references to National Highways and the SRN included.
DLP72	Adam Johnson	National Highways	It is welcomed that the draft Plan acknowledges that scoping with National Highways is required for applications that will affect the SRN. As outlined earlier it is essential that we work closely with Oldham to understand the potential cumulative impacts sites, which will be of particular importance when undertaking studies to determine appropriate mitigation measures required on the SRN.	Support noted. Text added to T5 to say, 'Where applications will affect the Strategic Road Network (SRN), applicants should provide confirmation from National Highways that the scope and detail of the Transport Statement and Travel Plan is sufficient for the purposes of assessing the application within the statutory timescales' to reiterate this point.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	Welcome the link to PfE Policy JP-C7, may wish to also include specific reference to the requirement of screening all transport assessments for all allocated development policies (specifically more than 100 vehicles or 20 HGVs which may pass Holcroft Moss SSSI along the M62) for clarity. Wish to highlight that financial contributions will be required at all allocations linked to Policy H1 and Policy E1 whereby a transport assessment has been produced. These allocations will need to consider Manchester Mosses SAC (specifically the Holcroft Moss SSSI component) in accordance to PfE Policy JP-G9 and JP-C7. Suggest links are made within Policy IN2, Policy H13 and Policy E1.	Support noted. Policy T5 has been amended to say, 'Any developments that are required to be accompanied by a Transport Assessment will need to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC) in accordance with Policy JP-C8 of PfE'. The Local Plan no longer includes allocations.
DLP34	Pauline Shearer	Sport England	Would encourage Active Design Guidance being referenced within this section. This policy broadly supports the principles of Active Design.	Policy T1 has been amended to say, 'The Local Plan will support the delivery of Oldham's Transport Strategy by ensuring that new development: Prioritises and promotes active travel to key points of interest by integrating Active Design principles into their design'. It is not considered necessary to add reference to Policy T5 too.

17. Responses submitted on the Communities Policies

Table CO1: Responses submitted on Policy CO1 Protection of Existing Open Spaces

In the Publication Plan this policy has been renamed and is now 'The Protection of Open Space, Sport and Recreation Provision'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	Support the protection of existing open spaces but also highlight that the Local Plan should make provision to remedy deficiencies in greenspace provision, including through land allocation.	Site allocations are not being made through this Local Plan. However, Policy CO2 sets out that the Council will support the enhancement of existing, and the creation of new, open space, sport and recreation provision in the borough. It also requires that major residential developments provide sufficient public open space, sport or recreation provision onsite (or where it is not possible to provide onsite, a financial contribution towards new or enhanced existing offsite public open space, sport or recreation provision will be sought). The policy ensures that new provision or contributions towards existing provision, is determined by local open space needs and deficiencies, as set out in local evidence. It is considered that this policy will help to address deficiencies in provision.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Welcome the acknowledgement within paragraph 19.1 that open space has a key role to play in enhancing biodiversity of the borough and mitigating against climate change and it is important that this function is not adversely	It is considered that Policy CO1 is sufficient to ensure the protection of open space. Other policies within the Plan also

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			impacted by inappropriate development. This condition could be included within the list of unacceptable circumstances.	deal with the protection of greenspace and the enhancement of biodiversity.
DLP34	Pauline Shearer	Sport England	Object to the wording of this policy on all four points - it does not offer enough protection for playing fields and conflicts with the aims of the NPPF in this regard. Suggest adding wording to reflect the intent of Sport England's Playing Fields Policy Exception E4 and Planning for Sport Objective 'Protect' which requires replacement provision to be accessible to existing and new users within catchment. Sets out the types of assessments required regarding the loss of playing fields. Explains that this is a 'standards based' approach to reprovision of open space which Sport England do not support. Any provision to replace lost playing field will be required to be based on local evidence of local need based on the latest assessment of playing field land based on Sport England's PPS Guidance and Assessing Needs and Opportunities Guidance (ANOG) and to accord with NPPF.	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 the policy, 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.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table CO2: Responses submitted on Policy CO2 New and Enhanced Open Spaces

In the Publication Plan this policy has been renamed and is now 'New and Improved Open Space, Sport and Recreation Provision'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support the policy.	Support noted.
DLP34		Sport England	Object to the wording of this policy. This is a 'standards based' approach to provision of outdoor sports facilities which Sport England does not support. The provision of new outdoor sports facilities should be based on the council's latest needs assessments based on Sport England's PPS Guidance and ANOG and to accord with NPPF paragraph 102. Welcomes the facilitation of leisure facilities however their location should be evidenced and based on an up to date needs assessment and in accordance with Sport England ANOG approach.	In terms of outdoor sports provision, the policy is now clear that the PPOSS will inform where provision is needed. It does not apply a standards-based approach and instead utilises the up-to-date assessment of needs (and actions) set out in the PPOSS. The PPOSS has been prepared in accordance with Sport England guidance.
DLP52	Andrew Bradshaw	CRE8 land & Planning	Support the policy.	Support noted.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table CO3: Responses submitted on Policy CO3 Open Spaces Standards

This policy has been incorporated into Policy CO2 'New and Enhanced Open Spaces'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP32	Martyn Walker	Lancashire Wildlife Trust	Welcome and support this policy. Refer the council to Building with Nature standards, which can be used to enhance the quality of open greenspace.	This policy has now been incorporated into Policy CO2. The 'Building with Nature' standards are referred to in other parts of the plan including policy N3 'Enhancing Green Infrastructure through development' and policy D1 'Achieving High Quality Design'.
DLP34	Pauline Shearer	Sport England	Object to the wording of this policy. This is a 'standards based' approach to provision of outdoor sports facilities which Sport England does not support. The provision of new outdoor sports facilities should be based on the Council's latest needs assessments based on Sport England's PPS Guidance and ANOG and to accord with NPPF paragraph 102.	This policy has now been incorporated into Policy CO2. In terms of outdoor sports provision, the policy is now clear that the PPOSS will inform where provision is needed. It does not apply a standards-based approach and instead utilises the up-to-date assessment of needs (and actions) set out in the PPOSS. The PPOSS has been prepared in accordance with Sport England guidance.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted. This policy has now been incorporated into Policy CO2.

Table CO4: Responses submitted on Policy CO4 Cultural, Community and Health Facilities

This policy has been renumbered and renamed as Policy CO3 'Community Facilities'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP4	Hyacynth Cabiles	NHS Property Services	Support the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. The NHS requires flexibility with regards to the use of its estate to deliver excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This doesn't mean that the healthcare services are no longer needed, rather it means that there are alternative provisions that are being invested in to modernise services. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the	<p>The policy wording has been amended to remove reference to economic viability and to provide greater flexibility, as requested. The policy now states that the loss of sites and premises used for community facilities will only be supported where:</p> <ul style="list-style-type: none"> a. It is proved the existing use has insufficient demand to support it or is no longer needed; or b. The loss is part of a wider proposal to improve service provision in the locality; or c. It is demonstrated that existing facilities nearby can adequately serve identified needs, in an equally accessible manner. <p>Text requested by the NHS has been added to the policy reasoned justification which states that "the approach taken within the policy recognises that there will be instances where facilities and services are no longer needed, in their entirety or in their current form, and that the impact of their loss has been considered as part of a wider strategy."</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. An amendment to the policy is requested with suggested policy text provided.	
DLP34	Pauline Shearer	Sport England	Support the aims of this policy to retain, enhance and provide new facilities. This should be based on the latest needs-based assessment which should be formed by a Build Facilities Strategy to accord with NPPF paragraph 102.	Noted. In addition to this policy, policy CO1 and CO2 also considers sports and recreation facilities.
DLP36	Tom Clarke	Theatres Trust	Supportive of the plan's approach to supporting and retaining valued facilities within and consider this policy to be consistent with paragraph 97 of the NPPF (2023).	Support noted.
DLP62	Sue Skinner	Dobcross Village Community Association	Suggest amending the final sentence of the policy to say the council will not support housing developments of 50 or more houses unless a commitment is obtained for a commensurate increase in primary healthcare and dentist provision within 30 minutes walking distance of the development.	PfE Policy JP-P6 requires 'where appropriate, the provision of new or improved health facilities as part of new developments proportionate to the additional demand that they would generate'. Local Plan policy CO6 also sets out requirements for new development and health provision.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as it enables neighbourhoods to become self-sufficient and rely less on longer distance travel due to the retainment or enhancement of existing services and facilities whilst being accessible by active travel modes and public transport. By reducing reasons to travel greater distances by private vehicle, new development in the borough should contribute significantly to a reduction in trips on the SRN.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table CO5: Responses submitted on Policy CO5 Education and Skills

This policy has been renumbered as Policy CO4.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP34	Pauline Shearer	Sport England	Would encourage the inclusion of the requirement for new educational development to provide for the wider community use of their sports facilities in the interests of achieving our wider outcomes for participation and inclusion and to meet the aims of paragraph 97 of the NPPF.	This is considered in the policy. The policy sets out that "where opportunities arise through new built development and change of use, the shared use of facilities by the local community will be encouraged through planning conditions or planning obligations as appropriate and where such usage can be accommodated without compromising the quality and accessibility for new and/or existing users."
DLP53	John Pilgrim	Department for Education	Welcome the commitment given within Policy CO5, to protect land and buildings in educational uses (where there is a demonstrated need), and to work with the local education authority to identify suitable sites for educational use.	Support noted.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table CO6: Responses submitted on Policy CO6 Securing Educational Places through New Residential Development

This policy has been renumbered as Policy CO5.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	As the council have not provided a Viability Assessment as part of this consultation, we are unable to comment on the soundness or appropriateness of this policy.	A Viability Assessment (2025) has now been carried out and informs the Publication Plan. The assessment has considered developer contributions for education places. In any case viability can be considered on a case-by-case basis in certain circumstances as set out in NPPF/ PPG, and in line with Local Plan policy IN2 'Planning Obligations'.
DLP23	Joanne Harding	Home Builders Federation	As the council have not provided a Viability Assessment as part of this consultation cannot comment on the soundness or appropriateness of this policy.	A Viability Assessment (2025) has now been carried out and informs the Publication Plan. The assessment has considered developer contributions for education places. In any case viability can be considered on a case-by-case basis in certain circumstances as set out in NPPF/ PPG, and in line with Local Plan policy IN2 'Planning Obligations'.
DLP53	John Pilgrim	Department for Education	There is an error in the supporting text for Policy CO6, at paragraph 19.38. The relevant legislation is the Education Act 1996. It would be helpful if policy provided greater clarity over how developer contributions will be sought to meet the need for early years, post-16 and SEND Places, recognising that the local authority has a duty to secure sufficient education and training provision for young people with an Education, Health and Care (EHC) plan up to the age of 25. Paragraph 19.43 should also be updated in the next	In regard to the error, this has been amended in the publication plan policy. The policy reasoned justification sets out that in relation to developer contributions for early years, post-16 and SEND places, the DfE's Developer Contributions Guidance provides further guidance on this matter. In addition, the reasoned justification encourages early engagement with the local education authority, as part of pre-application discussions, to ensure that the education demands generated

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			version of the local plan. The paragraph refers to DfE's plans to produce a detailed methodology for calculating pupil yield from housing development, to be published in due course. This work was completed in August 2023. The pupil yield factors in the dashboard are consistent with those from local evidence in Oldham, at 0.46 for primary education, and 0.29 for secondary. In paragraph 19.45, it would be helpful to highlight the fact that the cost of school places within new schools will be higher again than the figures quoted. The cost will be £23,192 for a primary place and £28,096 for a secondary place, based on 2023 prices.	by the development proposed are appropriately met - this can include considering early years, post-16 and SEND places. The policy reasoned justification has been amended to reflect the latest available yield figures (June 2025). However, the reasoned justification adds that "costs per school place will be identified using the DfE's most recently published local authority school places scorecards", to ensure that the costs reflect updated evidence. In addition, the reasoned justification encourages early engagement with the local education authority, as part of pre-application discussions, to ensure that the education demands generated by the development proposed are appropriately met. As such, it is considered that the policy allows appropriate flexibility to consider future cost changes and alternative costs, in line with evidence.
DLP72	Adam Johnson	National Highways	Welcomed that this policy seeks to consider the health and wellbeing impacts of a proposal and is in line with National Highways policy. It is considered that vehicle trips generated from a proposed development could impact on residents health and wellbeing and a reduction in vehicular trips should be sought, which in turn would generate less vehicle demand on the SRN.	Support noted.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table CO7: Responses submitted on Policy CO7 Health Impact Assessments in New Development

This policy has been renumbered and renamed as Policy CO6 'New Development and Health'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP4	Hyacynth Cabiles	NHS Property Services	Support the inclusion of the requirement for a Health Impact Assessment (HIA) on significant residential developments of 100 units or more.	Support noted.
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	<p>PPG4 sets out that HIAs are 'a useful tool to use where there are expected to be significant impacts' but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Only where there is a departure from the plan should the council consider requiring a HIA.</p> <p>Any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA for development proposals of 100 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.</p>	The policy has been amended to reflect PpE policy JP-P6 where a Health Impact Assessment will be required for all developments screened for an Environmental Impact Assessment, and other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing. This is in line with national planning guidance.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP23	Joanne Harding	Home Builders Federation	Generally, support plans that set out how the council will achieve improvements in health and well-being. In preparing its Local Plan the council should normally consider the health impacts with regard to the level and location of development. PPG sets out that HIAs are 'a useful tool to use where there are expected to be significant impacts' but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. So, where a development is in line with policies in the Local Plan a HIA should not be necessary. Only where there is a departure from the plan should the council consider requiring a HIA. In addition, any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA for development proposals of 100 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG.	The policy has been amended to reflect PfE policy JP-P6 where a Health Impact Assessment will be required for all developments screened for an Environmental Impact Assessment, and other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing. This is in line with national planning guidance.
DLP62	Sue Skinner	Dobcross Village Community Association	These are required for residential developments of 100 plus dwellings. However, a lot of developments in Saddleworth will be smaller than this, therefore for Saddleworth this should be reduced to 50.	The policy has been amended to reflect PfE policy JP-P6 where a Health Impact Assessment will be required for all developments screened for an Environmental Impact Assessment, and other proposals which, due to their location, nature or proximity to sensitive

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				receptors, are likely to have a notable impact on health and wellbeing. As such, the policy is not related to site capacity anymore.
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table CO8: Responses submitted on Policy CO8 Hot Food Takeaways

This policy has been renumbered and renamed as Policy CO7 'Hot Food Takeaways and Fast-food Outlets'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table CO9: Responses submitted on Policy CO9 Creating Sustainable and Accessible Communities

This policy has been removed.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP34	Pauline Shearer	Sport England	Supports the aims of point b. to achieve co-location of services and would welcome reference to Active Design Guidance as part of the Reasoned Justification.	This policy has been removed. Accessibility is considered through other plan policies.
DLP52	Andrew Bradshaw	CRE8 land & Planning	Support the policy.	This policy has been removed. Accessibility is considered through other plan policies.
DLP71	Richard Clowes	TfGM	Support the policy, however, for the definition of Very High Public Transport Accessibility and High Public Transport Accessibility seem to be the same and "a frequent bus route" is not defined.	This policy has been removed. Accessibility is considered through other plan policies.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			Would it be easier to use a GMAL score as per the Housing Density Policy H3? Also are "key services" defined in the Plan or supporting evidence?	
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as it enables neighbourhoods to become self-sufficient and rely less on longer distance travel due to the retainment or enhancement of new or existing services and facilities whilst being accessible by active travel modes and public transport. By reducing reasons to travel greater distances by private vehicle, new development in the borough should contribute significantly to a reduction in trips on the SRN.	This policy has been removed. Accessibility is considered through other plan policies.

18. Responses submitted on the Protecting Our Local Environment Policies

Table LE1: Responses submitted on Policy LE1 Noise Pollution and Vibration in New Development

In the Publication Plan this policy has been renamed and is now 'Ensuring a High Standard of Amenity in New Development'.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	The Local Plan should include a policy for the protection of Best and Most Versatile (BMV) agricultural land. Avoiding loss of BMV land is the priority as mitigation will not be possible on many development sites. Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a). The Local Plan should also include a policy for the protection and sustainable management of soils so that soil disturbance is minimised and to retain as many ecosystem services as possible through careful soil management during the construction process and appropriate soil re-use. Soil protection and sustainable management relates to other policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.	The Local Plan for Oldham includes PfE which includes Policy JP-G8 A Net Enhancement of Biodiversity and Geodiversity. Criterion 7 addresses our most valuable soil resources and seeks to safeguard our 'best and most versatile' agricultural land. Agricultural land, soil and peat are also referenced in Policy CC1.
DLP31	Melanie Lindsley	Coal Authority	Support the policy.	Support noted.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support this policy. Should also state that there should be no unacceptable impact on the natural environment.	The Local Plan must be read as a whole. Policy N1 addresses this.
DLP34	Pauline Shearer	Sport England	Support the inclusion of the 'agent of change' principle as a method by which to protect existing playing fields where they are located adjacent or close to development proposals.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP39	Alan Chorlton		Policy is welcomed.	Support noted.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as protection/improvement in air quality would support a modal shift away from road transport/car usage and reduce the number of vehicles on the SRN. It is essential that National Highways and Oldham work closely together to reduce the level of carbon emissions produced from road transport.	Comment noted.

Table LE2: Responses submitted on Policy LE2 Ground Conditions and Contaminated Land

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP31	Melanie Lindsley	Coal Authority	Support the policy and pleased to see that Policy LE2 Ground Conditions and Contaminated Land requires consideration to be given to risks posed by land instability and that if appropriate a Coal Mining Risk Assessment should accompany relevant planning applications.	Support noted.
DLP11	Simon Tucker	Canals and River Trust	Our network is often supported by existing embankment structures or cuttings, which are often at risk of instability from neighbouring development. The general wording of this policy does refer to 'land that is potentially unstable'. However, the policy text only seeks to address this issue through a 'Coal Mining Risk Assessment or Contaminated Land Assessment'. These reports are not likely to be appropriate to address the risk of land instability in all instances, where development has the potential to impose loading that could increase the risk of a land slip or collapse, and where the potential for land slips	The suggested policy wording has been incorporated into Policy LE2.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			is not only due to past coal mining activity. To ensure that land stability issues can be addressed satisfactorily, we request that the policy should be re-worded to refer to the potential submission of land stability reports by an appropriately qualified person may be required to address land instability issues. Suggested wording provided.	

Table LE3: Responses submitted on Policy LE3 Air Quality

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP31	Melanie Lindsley	Coal Authority	Support the policy.	Support noted.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Support the policy.	Support noted.
DLP14	Zoe Haystead	Natural England	Alignment should be made to PfE which outlines a long-term plan for sustainable growth. This includes proposed mitigation that is required to avoid adverse effects at Holcroft Moss SSSI under JP-G9 and Policy JP-C7.	Reference to Policy JP-C8 added to the Reasoned Justification of Policy LE3. The Publication Plan makes clear that the plan should be read alongside PfE.
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as protection/improvement in air quality would support a modal shift away from road transport/car usage and reduce the number of vehicles on the SRN. It is essential that National Highways and Oldham work closely together to reduce the level of carbon emissions produced from road transport highway. This will not only benefit the environment but also reduce the number of vehicles looking to utilise the SRN.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP61	Andrew Leyssens	United Utilities	Supportive of this policy in principle, but there should be a policy within the Local Plan which captures the agent of change principle to protect the operation of existing businesses / operations from encroachment issues. Recommend suggested wording is included within a new agent of change policy to protect existing businesses and operations.	Policy LE1 already mentions the agent of change. The plan must be read as a whole. Policy LE1 and Policy LE3 have information in the Reasoned Justification outlining what information is required to be submitted.

19. Responses submitted on the Infrastructure and Delivery in Oldham Policies

Table IN1: Responses submitted on Policy IN1 Digital Infrastructure and Telecommunications

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted
DLP72	Adam Johnson	National Highways	This policy is in line with DfT Circular 01/2022 as digital connectivity supports hybrid working, which reduces vehicles on the SRN.	Support noted.
DLP55	Natalie Belford	Manchester Airport	Welcome point 4 which prohibits new masts and telecommunications equipment that would cause interference to air traffic services but recommend an amendment to the policy wording 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'.	Comment noted. Criterion 4 amended to now read, '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'.

Table IN2: Responses submitted on Policy IN2 Planning Obligations

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP34	Pauline Shearer	Sport England	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.	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.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Agree that discussions with the council around planning obligations and requirements should be undertaken as early as possible.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			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.	
DLP72	Adam Johnson	National Highways	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 reduction in journey times and capacity issues will improve air quality.	Support noted.
DLP14	Zoe Haystead	Natural England	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.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	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.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	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 and Delivery Plan prepared to support the Plan also considers the borough's infrastructure needs.
DLP23	Joanne Harding	Home Builders Federation	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. NPPF is clear	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

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			that plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the plan. The 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. Concerned the council are restricting the circumstances where it is possible to submit a Viability Assessment, and it is likely that the Viability Assessment when prepared will highlight viability challenges within Oldham, and in which case it would seem inappropriate not to accept site specific viability assessments on all sites.	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.
DLP4	Hyacynth Cabiles	NHS Property Services	Welcome the recognition of health infrastructure when securing developer contributions, where development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. Emphasise 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	In addition to policy IN2, policy CO6 sets out the policy for ensuring new development is supported by appropriate health provision The Infrastructure and 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.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			<p>costs required to support the projected growth and development across the Local Plan area.</p> <p>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.</p> <p>Further guidance on a suggested process is included.</p>	
DLP61	Andrew Leyssens	United Utilities	<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</p>	<p>The policy notes that "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."</p> <p>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>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			management policy in the plan to this effect. Suggested wording is included.	
DLP53	John Pilgrim	Department for Education	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 retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth.	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 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.
DLP71	Richard Clowes	TfGM	Support 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.

Table IN3: Responses submitted on Policy IN3 Delivering Social Value and Inclusion

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP10	Rebecca Sowerbutts	Countryside Partnership / Vistory Group	Do not consider that it is 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.	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.
DLP23	Joanne Harding	Home Builders Federation	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.
DLP72	Adam Johnson	National Highways	Welcome 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	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			outside of the borough and meets with National Highways policy.	
DLP71	Richard Clowes	TfGM	Support the policy.	Support noted.

Table IN4: Responses submitted on New Suggested Policies for Infrastructure and Delivery in Oldham

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP61	Andrew Leyssens	United Utilities	<p>UUW has concerns regarding any site allocations which are in multiple land ownerships. The experience of UUW is that where sites are in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently.</p> <p>We recommend that future policy requires applicants to provide drainage strategies for foul and surface water. For larger sites, we recommend that policy requires applicants to prepare an infrastructure phasing and delivery strategy. For strategic sites, we recommend that early consideration is given to the infrastructure strategy as part of the preparation of the local plan and to ensure a co-ordinated approach to the delivery of new development and infrastructure. We would recommend the following policy is considered for inclusion in any future local plan:</p> <p>'Where applications are submitted on land which is part of a wider allocation / development, applicants will be expected to submit</p>	<p>The Publication Plan no longer includes site allocations (policy H13 has been removed), therefore it is not considered necessary to include the suggested policy. In addition, Publication Plan Policy CC3, states that 'For any development proposal which is part of a wider development / allocation, foul and surface water strategies will be part of a holistic site-wide drainage strategy'.</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			allocation/development wide infrastructure strategies to demonstrate how the site will be brought forward in a co-ordinated manner. The strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over lengthy time periods and by numerous developers. Where necessary, the strategy must be updated to reflect any changing circumstances between phase(s) during the delivery of the development.'	

20. Responses submitted on the Monitoring Chapter

Table M1: Responses submitted on Plan Monitoring

ID No / Ref	Name	Organisation	Summary of Comments	
DLP3	Emily Hycran	Historic England	Amend to 'English Heritage' to 'Historic England'.	Comment noted and amendments made.
DLP34	Pauline Shearer	Sport England	Do not accept that indicators 7 and 8 are appropriate for the provision of outdoor sports facilities as it does not conform to the local needs-based approach based on latest assessment (PPS/PPOSS) in accordance with Sport England's PPS Guidance and ANOG and to accord with NPPF.	In terms of outdoor sports provision, Policies CO1 and CO2 have been amended to make clear that the PPOSS (2025) will inform provision needs. The PPOSS has been prepared in accordance with Sport England guidance. As required, the PPOSS will be updated as necessary to ensure the assessment continues to provide updated evidence of outdoor sport needs.
DLP23	Joanne Harding	Home Builders Federation	Recommend the council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. Recommends the council provide more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.	Comment noted. The Publication Plan contains Policy M1 'Monitoring Framework', which sets out how the Local Plan will be monitored.

21. Responses submitted – Overarching comments

Table O1: Responses submitted – overarching comments

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP1	Dr Doyle		Comments largely concerned with infrastructure and transport issues in Diggle and the wider Saddleworth area such as a lack of cycle paths, narrow roads, lack of parking, sunken curbs and vibrations from the buses.	Comment noted. The vision in the Local Plan is for the borough to have accessible and sustainable transport choices, providing improved connectivity across the borough, the city-region and beyond.
DLP44	Wiktora Sypnicka	Emery Planning on behalf of Chasten Holdings Ltd	To be consistent with NPPF, the plan period should be extended to 2040 at the earliest, with 2041 being the most appropriate.	The Local Plan is a Part 2 Plan to Places for Everyone (PfE). As such, the plan period is in line with the PfE plan period of 2022-2039.
DLP49	Olivia Carr	Turleys on behalf of Northstone	To be consistent with NPPF, the plan period should be extended to 2040 as a minimum.	The Local Plan is a Part 2 Plan to Places for Everyone (PfE). As such, the plan period is in line with the PfE plan period of 2022-2039.
DLP43	Wiktora Sypnicka	Emery Planning on behalf of Joe Jaskolka	To be consistent with NPPF, the plan period should be extended to 2040 at the earliest, with 2041 being the most appropriate.	The Local Plan is a Part 2 Plan to Places for Everyone (PfE). As such, the plan period is in line with the PfE plan period of 2022-2039.
DLP64	Stephen Harris	Emery Planning on behalf of Joe Jaskolka	To be consistent with NPPF, the plan period should be extended to 2040 at the earliest, with 2041 being the most appropriate.	The Local Plan is a Part 2 Plan to Places for Everyone (PfE). As such, the plan period is in line with the PfE plan period of 2022-2039.
DLP35	Ruth Cook	Trafford Council	Trafford Council is supportive of the approach set out within the consultation documents and consider that it complements the strategic Places for Everyone Plan as well as the emerging Trafford Local Plan.	Support noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP34	Pauline Shearer	Sport England	Comment on the Glossary - Open Space - Sport England would encourage the inclusion of an additional line to differentiate 'playing field land' from that of other Open Space typologies. Sport England encourages the inclusion of an additional term 'Playing Field' to differentiate from that of other Open Space typologies.	The glossary has been amended for 'Open Space' to note that 'Outdoor sports facilities can include or constitute playing fields/ pitches, as well as other types of outdoor pitches.' In addition, there is a definition of 'Playing Field' included.
DLP42	Nick Reeves	Kirklees Council	Housing and Employment – with the Kirklees position on Greater Manchester's housing and employment needs being discussed through the processes for the Places for Everyone Plan, we have no further comments to make on the housing and employment element of the plan. In relation to Waste – waste management sites in Kirklees receive waste from Oldham however we will continue to engage through the usual waste DTC processes.	Comment noted.
DLP5	Jan and Pete Briggs		Comments regarding over development in Chadderton and criticises Green Belt release as part of Places for Everyone.	Comments noted.
DLP28	Cllr Howard Sykes	Oldham Liberal Democrats Group	Oldham should disengage from PfE, a brownfield first approach to housing development is needed, spaces for small business start-ups needed, empty properties that are in disrepair to be addressed, shared ownership for developers who avoid s106 payments, licensing scheme should be expanded to the whole private rented sector and more school streets needed.	Comments noted. PfE was adopted in March 2024, becoming part of Oldham's development plan. The Local Plan seeks to address many issues including promoting the efficient use of land, including brownfield land, supporting employment opportunities, providing good quality housing, securing appropriate developer contributions towards infrastructure as part of new development and supporting transport and accessibility improvements.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP55	Natalie Belford	Manchester Airport	Manchester Airport must be afforded policy protection to ensure that its operational safety and efficiency are not compromised. This has some implications for land and development and may influence the type of development allowed in certain areas. It is essential to have an appropriate and robust policy within your Local Plan to ensure that aviation interests are protected. This is absent from the draft Local Plan, and we therefore request that it be included. Suggested wording provided.	Comment noted. Policy D1 has been amended to include three criteria concerned with what development proposals involving tall buildings are required to demonstrate including that they should, 'not unduly affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing and shading, noise, reflected glare, aviation, navigation and telecommunication interference'.
DLP32	Martyn Walker	Lancashire Wildlife Trust	Suggest wording amend to paragraph 2.3 to include 'biodiverse' and supports paragraph 2.10. Comments on the summary of the issues and options consultation on climate change and green infrastructure.	These aims are from the Oldham Plan which is a separate document. However, in responding to the biodiversity duty the Council has published its biodiversity policies and objectives which includes an action to consider biodiversity in future reviews of corporate documents. Support for 2.10 noted and comments on earlier consultation summary noted. Text has been added to supporting text of Policy N1 on open mosaic habitats to address brownfield sites with biodiversity value.
DLP63	Lizzie Schofield	Millson Group on behalf of Stonesbreak Group	The plan period should be extended to 2040 at the earliest, potentially 2041.	The Local Plan is a Part 2 Plan to Places for Everyone (PfE). As such, the plan period is in line with the PfE plan period of 2022-2039.
DLP6	John Morris		Comments that there is too much reliance on brownfield land and there is a lot of very poor farm land that could be used for solar panel farms or job creation sites.	As set out in the policy reasoned justification for Policy H1, the redevelopment of brownfield land is central to achieving sustainable development and

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				maximising our housing land supply and the Council will encourage the redevelopment of suitable brownfield land (the majority of sites identified within the SHLAA are brownfield), however there are also a number of sites which are made up of both brownfield and greenfield land, and also some greenfield sites. It is important in meeting our housing requirement and addressing local needs, that we deliver all sites within our housing land supply. Policy H1 supports the delivery of the housing on other suitable sites that may become available.
DLP23	Joanne Harding	Home Builders Federation	The Plan period to 2039 is unlikely to be appropriate and it is important that the Plan provides a 15-year period at the point at which the Plan is adopted.	The Local Plan is a Part 2 Plan to Places for Everyone (PfE). As such, the plan period is in line with the PfE plan period of 2022-2039.
DLP40	Jackie Copley	CPRE	The health and well-being benefits of local green space are clear as well as other benefits of not traveling to enjoy countryside. More development puts pressure on our greenspace, including sensitive ecology and we hope the Oldham Local Plan will be cautious about where needed new development goes. In relation to climate change and sustainable development we require a modal shift from private to public vehicles and in the balance aims of Transport for the North to level up the north in terms of connectivity. In the wake of HS2, alternative options should be explored with an option with	Comments noted.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
			least harm to countryside, and green infrastructure including peatmoss chosen.	
DLP53	John Pilgrim	Department for Education	Notes that some growth in housing stock is expected in the borough, this will place additional pressure on social infrastructure such as education facilities. NPPF advises that LPAs should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education. Support the principle of Oldham safeguarding land for the provision of new schools. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. Oldham should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.	<p>The Council has a statutory duty to ensure that there are sufficient school places available within the borough to meet the educational needs of the population. In addition to PfE policy JP-P5, Policy CO5 of the Local Plan seeks to ensure that new residential development (of 10 dwellings and above) which would create or exacerbate a shortfall in the number of local school places, contributes to new and/or improved education facilities. This is to address the unmet need that may be generated by the development, i.e. from an increase in population/ families. The policy goes on to set out that such provision will typically involve making a financial contribution towards the expansion of an existing education facility in agreement with the local education authority. Where it is not practicable or desirable to meet the unmet demand through expanding capacity on-site provision may be required and the Council will negotiate with developers to secure the setting aside of land to accommodate the additional education provision.</p> <p>The Council's SCAP considers school capacity, pupil forecasts and capital spend. It is informed, in part, by the Council's Housing Land Supply (set out in the SHLAA) in terms of anticipated future</p>

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
				housing growth and development in the borough. Further detail is set out in the Communities Topic Paper.
DLP72	Adam Johnson	National Highways	Set out National Highways statutory function, the SRN in Oldham and refer to some transport documents that need to be followed while preparing Local Plans, transport evidence needed and what was done in PfE. In Policy Context and Legal Requirements and would like DfT Circular 01/2022 referred to. Information and guidance also provided regarding work already carried out as part of PfE and transport modelling work that is needed.	Comments noted. DfT Circular 01/2022 referenced at appropriate points in the Publication Plan.
DLP78	Trevor Simpson		The whole thing is too complicated to understand.	Noted.
DLP51	Rebecca Dennis	Pegasus on behalf of various landowners - Failsworth Rd, Woodhouses	The Draft Local Plan does not distinguish between its strategic and non-strategic policies. For the Local Plan to be consistent with national policy as required by paragraph 35(d) of the NPPF, and for the Local Plan to achieve the requirements of paragraph 21 of the NPPF, it must clearly distinguish between its non-strategic and strategic policies. For the Local Plan to be consistent with national policy as required by paragraph 35(d) of the NPPF, and for the Local Plan to achieve the requirements of paragraph 22 of the NPPF, the plan period will need to be extended and kept under review to ensure that it covers a minimum 15-year period.	Section 2 of the Publication Plan sets out that the purpose and role of the Oldham Local Plan is to support delivery of PfE in Oldham. It does this by providing more detailed non-strategic 'development management' policies that support the strategic policies in PfE, whilst ensuring that together they reflect, and support delivery of, the Council's priorities and those of our Building a Better Oldham regeneration ambitions.

ID No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP58	Alison Shore		General concerns regarding Sholver area and how it has been neglected and asks the council not to abandon it.	The Local Plan seeks to ensure the positive development and protection of the borough as a whole.
DLP37	Anita Lowe		The whole document far too long and disgraceful that you're expecting the people of Oldham to respond to some or all of this. Its content is too deep and involved and should be amended to suit the everyday constituent. It seriously requires some change as all the plans are confusing and long winded	Comment noted. The Local Plan is a planning document which aims to guide development of the borough. As such, a level of technical detail is important so that the plan can be used effectively in the planning process.
DLP57	Julie Ball		PfE has spoilt addressing the biodiversity emergency, protecting our local environment and creating a better and beautiful Oldham.	The Local Plan seeks to ensure the positive development and protection of the borough, including our natural and built environment. Policies are included which aim to protect and improve biodiversity, the local environment and design of the borough.
DLP45	Becky Anderson	Homes England	Homes England does not wish to make any representations on the draft Local Plan.	Comment noted.

22. Responses submitted on the Integrated Assessment

Table IA1: Responses submitted on the Integrated Assessment

IA No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP3	Emily Hycran	Historic England	Comments submitted on Vision, PO9, H3, H9, H12, H13, E4, OTC1, OTC2, OTC3, CC1, CC2, HE1, HE2, HE3, HE4, HE5, D1, D2, D3, D4, D5 with opinions provided on the scoring given.	Historic England's comments on the scoring given have been taken into account in the IA of the Publication Plan.
DLP14	Zoe Haystead	Natural England	Comments submitted on the Scoping Report Update 2 in relation to: highlighting where there is an evidence gap, having regard to neighbouring districts designated sites more, safeguarding best and most versatile agricultural land, air quality sensitive sites, section on biodiversity, flora, fauna and soil being too generic, landscape section not referring to Peak District National Park and Manchester Pennine Fringe National Character Area, expect to see deficiencies and barriers to open space targeted (example given), expect further consideration of water sensitive designated sites, other wetland based habitats including peatlands and nature based solutions, wish to see links made between climate change resilience and the nature-based solutions offered from peatland and do not support development on peat, or the extraction and importation of peat resources. Natural England recommend this is clearly reflected within the Local Plan.	Detailed responses to Natural England's comments are provided within the IA Scoping Report Update 3 - section 6.

IA No / Ref	Name	Organisation	Summary of Comments	Council's Response
DLP14	Zoe Haystead	Natural England	Comments submitted on the Integrated Assessment in relation to: Objectives and Indicators included two amendments in relation to IA objectives 1 and 13 and the suggestion of a new IA objective in relation to designated sites, soils and peats. In addition, comment that the layout in relation to Proposed Sustainability Indicators is hard to follow - suggest a table format instead. Monitoring indicators have been suggested in relation to biodiversity / fauna / flora and soil, landscape, human health, air and climatic factors and peat and soils.	Detailed responses to Natural England's comments are provided within the IA Scoping Report Update 3 - section 6.
DLP14	Zoe Haystead	Natural England	Comments submitted on the Habitats Regulations Assessment (HRA). Concur with the appropriate assessment conclusion, providing all mitigation measures are appropriately secured. Concur with the conclusion that the allocation policies and wider policy is unlikely to have a likely significant effect due to direct impact on Functionally Linked Land associated to The South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA. In relation to recreational disturbance, support conclusions for project level HRAs for developments within close proximity to the designated site and alignment with Policy N2 Restoring Nature and support the conclusions made within the Appropriate Assessment and alignment with PfE Policy JP-G9, JP-G5 and the South Pennine Moors SAC/SPA Supplementary Planning Document. However, recommend that allocations which are situated within 7km of the South Pennine Moors SAC and the South Pennine Moors Phase 2 SPA	Detailed responses to Natural England's comments are provided within the IA Scoping Report Update 3 - section 6.

IA No / Ref	Name	Organisation	Summary of Comments	Council's Response
			<p>are clearly stated and reflected in the relevant policies. In relation to air pollution effects, agree with the conclusions in relation to Rochdale Canal, The South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA and Manchester Mosses SAC. Would expect that amendments are made to policies T5, IN2 and N1 to reflect the Manchester Mosses SAC conclusions. agree that there will be no in-combination effects arising from the Oldham Local Plan, providing that mitigation is provided for recreational disturbance effects on the South Pennines SAC/SPA and for air pollution effects on the Manchester Mosses SAC. As likely significant effects to Rochdale Canal SAC have been identified by the plan alone, we agree that further assessment of in-combination effects is not required.</p>	
DLP32	Martyn Walker	Lancashire Wildlife Trust	<p>Find that the Preliminary Ecological Appraisal Reports (PEARs) for allocated sites to be inadequate in determining the potential effects of planning proposals on biodiversity. Whilst it is understood that more detailed survey information is provided at the application stage, a PEAR is not always adequate to assess if the exiting biodiversity can be incorporated effectively into the proposed development. Development is then 'fitted-in' at the expense of the existing biodiversity and in some cases, this can lead to the loss of important biodiversity resource such as Section 41 priority species. To be clear, this is a general observation regarding the planning</p>	<p>Noted. The Local Plan is not allocating any sites now for development.</p>

IA No / Ref	Name	Organisation	Summary of Comments	Council's Response
			process, rather than a specific assessment of the draft Local Plan.	

23. Sites submitted as potential development sites

Table S1: Sites submitted as potential development sites

All sites were put forward for residential use.

ID No / Ref	Name	Individual or Organisation	Site Name	Council's Response
DLP24	Mr D Jones	Marc Hourigan (Hourigan Planning)	Land North of Ashton Road	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP25	Ms Harvey	Tom Robinson (JLL)	Land at Ward Lane, Diggle	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and

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				mixed-use) allocations are not necessary.
DLP43	Wiktora Sypnicka	Emery Planning on behalf of Joe Jaskolka	Land off Ripponden Road (Spinners Way)	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP44	Wiktora Sypnicka	Emery Planning on behalf of Chasten Holdings Ltd	Land off Steadway and Hollyville	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP49	Olivia Carr	Turleys on behalf of Northstone	Hanging Chadder	The Publication Plan no longer includes site allocations (policy H13 has been removed). This

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				Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP51	Rebecca Dennis	Pegasus on behalf of various landowners - Failsworth Rd, Woodhouses	Land west of Failsworth Road (Trotting Track)	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP52	Andrew Bradshaw	CRE8 land & Planning	Maltby Court	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides

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				evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP56	Jon Power	Asteer Planning on behalf of Saddleworth Property Partnership (SSP)	Saddleworth Business Centre	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP63	Lizzie Schofield	Millson Group on behalf of Stonesbreak Group	Springhead Quarry (Stonebreaks)	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and

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				mixed-use) allocations are not necessary.
DLP64	Stephen Harris	Emery Planning on behalf of Mr W Lumb	Land North of Trent Mill Industrial Estate, Shaw	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP65	Stephen Harris	Emery Planning on behalf of Sheridan Group	Land at Bottom Field Farm, Woodhouses	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP66	Chris Sinton	CBRE on behalf of Sigma Property Co	Marlborough Mill	The Publication Plan no longer includes site allocations (policy H13 has been removed). This

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				Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP60	Chris Sinton	CBRE on behalf of Muse Places Ltd	Oldham Town Centre Sites (Civic Centre, Former Magistrates and Manchester Chambers, Former Leisure Centre, Princes Gate, Bradshaw St, Southgate and Waterloo St, Henshaw House, Metropolitan Place)	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.
DLP59	Chris Sinton	CBRE on behalf of Estuary Park Property Holdings Ltd	Shaw Distribution Centre	The Publication Plan no longer includes site allocations (policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides

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				evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.