

# Oldham

# Local Plan

**Oldham Publication Local Plan:  
Schedule of Representations  
Received**

August 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
- **EIA** – Environmental Impact Assessment
- **GI** – Green Infrastructure
- **GMAL** – Greater Manchester Accessibility Level
- **GMCA** - Greater Manchester Combined Authority
- **GMLNRS** - Greater Manchester Local Nature Recovery Strategy
- **HIA** – Health Impact Assessment
- **LGS** – Local Green Space
- **LPA** - Local Planning Authority
- **NPPF** - NPPF
- **OPOL** - Other Protected Open Land
- **PfE** - PfE
- **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
- **UGF** – Urban Greening Factor

## 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 4 February 2026 and 27 March 2026, the Council consulted on the Publication 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, the Issues and Options consultation which was carried out in July and August 2021 and the Draft Local Plan consultation which was carried out in January and February 2024.
- 1.3 This document summarises the comments received as part of the Publication Stage Local Plan consultation and which organisation or individual made the comments. The tables in sections 3 to 18 of this document relate to different chapters within the Publication Local Plan, the table in section 19 summarises any plan wide comments received and the table in section 20 summarises any comments received in relation to the supporting documents. Section 21 sets out comments received in relation to specific sites.
- 1.4 In relation to the comments set out (in sections 3 to 21 of this document), where a modification or explicit amendment to the Plan has been proposed by a respondent this is shown briefly in the tables below. For clarity the Council has taken the approach in this document that where new text is proposed this is shown as underlined and where text is proposed to be deleted this is shown as struck through. In some cases, parts of policy/text are shown as entirely replaced. Due to the nature of some proposed amendments/modifications the table below may provide a summary and point to the full modification set out in the respondent's representation.
- 1.5 An Integrated Assessment (IA), Scoping Report Update, Infrastructure Delivery Plan (IDP), Habitat Regulation Assessment (HRA), Strategic Flood Risk Assessment (SFRA), Strategic Housing Land Availability Assessment (SHLAA) and Topic Papers were produced and published alongside the Publication Local Plan document. Any comments received in relation to these documents have also been summarised in this document.
- 1.6 All documents associated with the Local Plan Review are available on the Council's Local Plan Review webpage.
- 1.7 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](mailto:SPI.Consultations@oldham.gov.uk).

## 2. Summary of Issues Raised

2.1 During the Publication Local Plan consultation, a total of 433 individual comments were received from 46 separate respondents. Table IR1 below sets out a summary of the issues that were raised during the consultation.

**Table IR1: Summary of the issues raised**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Overarching / General Comments</b> <p>To be consistent with NPPF, the plan period should cover 15 years and be extended to 2042 at the earliest.</p> <p>The Plan's reliance on an outdated housing requirement, derived from the 2021 NPPF standard methodology and set out in PfE, reinforces the importance of identifying additional deliverable housing sites. The Plan should use Government's most recent standard method for calculating housing need (December 2024 NPPF).</p> <p>The Plan should take a more proactive approach by identifying additional housing sites at this stage rather than relying on an early review of the Local Plan, which risk the Council being unable to demonstrate a deliverable 5-year housing land supply.</p> <p>A positively prepared plan should identify a sufficient supply of deliverable and developable land, including appropriate Green Belt release sites where necessary.</p> <p>Concerns about the way that the Local Plan often treats the borough as a more singular area than is the case - this is a borough of great diversity and contrasts.</p> <p>Several sites were suggested as being suitable for housing development (including for allocation).</p> |
| <b>Spatial Portrait</b> <p>Comments made requesting alterations the Spatial Portrait to make further distinctions of the differences in the boroughs districts, such as those related to demography, housing stock and needs, and access to public transport.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Vision</b> <p>General support for the Vision with some suggestions to amend it, including recognising the importance of villages, emphasising the different requirements of Saddleworth and adding text to say that new homes will be delivered where need is located.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Plan Objectives</b> <p>The Plan Objectives were generally supported, with some amendments suggested including referencing social housing, opportunities for growth and a commitment to carrying out an assessment on the borough's conservation areas.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

## Homes

The Local Plan should include an 'exception policy' so that there is a mechanism to boost affordable housing above and beyond what can be anticipated through Policy H1 and Policy H5 of the Plan.

The housing requirement for the emerging Local Plan should reflect the latest standard method figure to ensure that the Plan is positively prepared and reflects National Planning Policy Guidance.

The use of Greater Manchester Accessibility Level (GMAL) level 4 in Policy H1 is too stringent/ inflexible.

The Council should take a more proactive approach to meeting future housing development by identifying additional land; there is a lack of site allocations and there is a need to allocate sites to demonstrate deliverability of the land supply and provide certainty to developers.

A number of sites were submitted suggesting their suitability as housing sites (including for allocation).

The Local Plan fails to meet NPPF paragraph 69 requirements in relation to a deliverable supply. There is insufficient certainty that housing delivery will be achieved over the plan period.

The minimum housing densities in Policy H2 should not restrict development coming forward in circumstances where site specific characteristics do not allow these densities to be achieved.

Some respondents supported Policy H3 in relation to its flexibility, whereas others felt a more flexible approach should be taken regarding housing mix which recognises that needs and demands will vary by area and site, and to ensure scheme viability.

In relation to Policy H4, there were questions surrounding how viability considerations had been accounted for and a request that all new private and social housing developments are built to Building Regulation M4(2) standard and 10% are built to to Building Regulation M4(3) wheelchair accessible standard.

For Policy H5, comments were made stating that it is important that the policy is applied flexibly to ensure that development remains viable and deliverable across all sites. There were suggestions that the Council explores alternative strategies for significantly boosting the supply of affordable housing, including, increasing the overall housing requirement such that it reflects the latest standard method and justifies more viable edge-of-settlement greenfield sites for development over the plan-period that are able to accommodate greater levels of affordable housing in viability terms. Also, in relation to Policy H5, comments were made that the policy requirements are unjustified when compared with the conclusions of the Plan Viability Assessment.

## Economy and Employment

Queries raised regarding the methodology used to calculate the employment floorspace requirement in Policy E1.

Site-specific comments received regarding the suitability of some of the proposed Business and Employment Areas and premises within them for continued employment use, and infrastructure assets on some sites.

### **Our Centres**

Criticism that Policy C2 requires a lower Impact Assessment threshold than NPPF, stating that there is not enough evidence to justify it.  
Request that Local Shopping Parades are renamed Local Service Clusters and a suggestion that there should be a reference in Policy C4 to places where there is sufficient housing density to justify the provision of services, but they are not currently present.

### **Oldham Town Centre**

Comments regarding the desire to have Oldham Civic Centre retained.  
Support for additional facilities for cultural and live performance venues to complement the Coliseum Theatre.  
Some amendments requested in relation to managing surface water.  
Support for proposals to increase green links and provide enhanced biodiversity provisions within new development.

### **Addressing Climate Change**

Comments that there should be a presumption against development on deep restorable peat that either reduces the area of peat, the condition of the peat, or impacts its ability to be rewetted and restored.  
Concern that renewable energy infrastructure in the Green Belt may be treated as permitted development, rather than something that must be evidenced and justified.  
Request that any flood risks that United Utilities identify in an initial high-level review of Oldham's Land Supply are reflected in an updated SFRA and in any supporting land supply data (e.g. land assessments for housing and employment land supply).  
Comments that Policy CC2 reiterates the requirements of national policy, rather than establishing the necessary policy framework.  
United Utilities requested minor amendments to Policy CC3 in relation to referring to a management or maintenance plan, including reference to developments that could affect drainage and stated that every effort must be taken to apply the hierarchy for surface water management.  
Also, in relation to Policy CC3, comments were made that the policy largely duplicates existing national policy and guidance and does not present an appropriate strategy which is tailored to the circumstances of the local area.  
Comments were made that the evidence presented in relation to Policy CC4 does not justify requiring all new residential developments to achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2.

### **Natural Environment and Open Land**

Comments include that Policy OL2 should say that development will be determined in accordance with national Green Belt planning policy guidance. Any additional text requirements are not necessary and are subject to being superseded each and every time national planning policy guidance on the Green Belt is amended.

The Plan seeks to make minor alterations to Green Belt boundaries which is welcomed. However, the relevant Topic Paper does not provide any transparency as to what methodology has been followed. It is unclear why certain Green Belt boundaries have been amended and others have not. Not aware of any recent Green Belt Assessment having been carried out to inform this process.

Where Local Green Spaces contain a playing field, the policy does not provide sufficient protection and is inconsistent with NPPF. The policy needs to define the difference between outdoor sports and recreation facilities and open space.

Policy OL5 should explicitly require consideration of the duration and control of lighting, the policy would be more effective and better aligned with the NPPF.

### Addressing the Biodiversity Emergency

In relation to Policy N1, comments advise that weight is given to Inspectors' Report of PfE which states that deep peat that is capable of being restored with human intervention (i.e. that which has not been "destroyed") can meet the NPPF definition of an irreplaceable habitat due to its age and rarity. Would like to see policy that protects deep peat from development and extraction to avoid the ambiguity of the current national planning policy and to conform with the PfE Inspector's findings.

Also, for Policy N1, comments provided that the policy should be strengthened to ensure consistency with the strategic approach in PfE (in particular Policy JP-G8), which seeks to avoid the fragmentation of habitats and maintain ecological connectivity.

Policy N2 sets out the Council's approach to Biodiversity Net Gain (BNG), confirming its alignment with the national requirement for at least 10% net gain to be achieved. The PPG is clear that plan-makers do not need to duplicate the detailed provisions that is already in the statutory framework for BNG.

Concern raised that the requirements in Policy N3 related to the Urban Greening Factor (UGF) may not be appropriate in all circumstances and that applying the UGF rigidly could restrict the developable area and constrain the amount of employment floorspace delivered.

Concern that the tree replacement ratios proposed in Policy N4 have the potential to have a significant impact on the developable land for any development and may have significant implications for the density of developments. PfE Policy JP-G7 requires that trees be replaced in a ratio of 2:1 - this is a much more consistent approach, rather than the number of replacement trees being dictated by trunk diameter.

### Historic Environment

Comments made on Policy H4 regarding the assessment of mills carried out for the Mills Strategy, including on the determination of scoring, in particular for the 'sense of place' criteria. The consultation on the Mills Strategy also didn't include the public. Comment questions if the highly protectionist approach adopted here can be justified.

Some site-specific comments made regarding individual mills.



### **Achieving High Quality Design**

Concern that since Draft Plan stage the Design Scrutiny policy has been deleted and replaced with a sentence in Policy D1. Also concerns raised that there is not enough clarity as to when design reviews will be required and if they will be used appropriately and proportionately. Concerns that the references to advertising in conservation areas in D2 simply states that the advertising should be compliant with policies HE2 and HE3, which do not mention advertising. Strongly suggest the policy should actively strengthen the conditions applied to advertising in conservation areas if it is to have any impact.

### **Creating a Sustainable, Active, Accessible Network for Oldham**

Comment made the transport evidence available at Regulation 19 is incomplete and as a result, the overall effect of the Plan on the Strategic Road Network (SRN) cannot yet be understood.

Questions asked regarding the Standedge Tunnels project mentioned in Policy T1 and the electrification of the rail line.

Also, in relation to Policy T1, comments raised that the planning application stage is considered to be too late to fully realise the requirements for cumulative mitigation, and that the requirement for transport infrastructure to be in place prior to the occupation of development is overly rigid and does not reflect the practical realities of delivering large-scale strategic employment sites.

Comment that Park and Ride Facilities can reduce car journeys but generally tend to do so only when they are located near to journey origin such as a residential area rather than when located close to their destination.

Concerns that there are no parking standards for new development and that a criteria approach will not produce equivalent outcomes in terms of managing parking demand at accessible locations.

Policy T4 in relation to Electric Vehicle Charging Infrastructure goes over and above Part S of Building Regulations - there is no mechanism in the plan-making system to go above this, and the requirement is therefore superfluous and, in line with paragraph 16 of the NPPF, should be deleted. In addition, it is unclear whether the appropriate viability evidence has been considered for the policy's impact on non-residential developments, which puts into question whether the policy is justified.

### **Communities**

Comments that the policies in relation to open space and recreation are somewhat confused with how they relate to playing fields.

Question raised regarding the 2022 Open Space Study and why it had not been issued as a key evidence base document as part of this consultation.

Some site-specific comments raised regarding certain identified open spaces.

Policy CO5 could be more proactive in identifying where school expansion or new schools will be required in order to provide greater certainty for developers – this could be better reflected in the Local Plan. In addition, there is no clear assessment of the realistic potential to expand

existing schools, or the extent to which new school provision may be required. Related to this, the policy is unclear whether the cumulative impact of development can be accommodated through the mechanisms set out in the policy, particularly in areas of significant growth. The Plan Viability Assessment makes a general allowance for an education contribution which is included in an overall S106 cost assumption derived from the per plot allowance used in the PfE with an uplift included. The breakdown of this figure and how much specifically is for education and how this figure is derived is unclear.

In relation to Policy CO6, comment provided regarding how developments will, outside of those screened for Environmental Impact Assessment (EIA) purposes, be assessed to establish whether a Health Impact Assessment (HIA) is needed.

In relation to Policy CO7, comment made that out-of-centre retail parks are not places where children and young people congregate and the policy should be amended to reflect this.

### **Protecting Our Local Environment**

Comment made that Policy LE1 should refer to a wider range of amenity considerations such as odour and dust.

In relation to Policy LE2, request to add in text relating to proposals that may result in contaminants entering surface or foul water systems.

Comment that Policy LE3 allows for developments to be assessed in isolation, meaning that incremental impacts in already constrained areas can be accepted even where there is clear evidence that cumulative development will lead to unacceptable air quality and congestion without mitigation.

### **Infrastructure and Delivery**

In relation to Policy IN1, comment made that the requirement for broadband infrastructure for new residential developments is already set out in Part R of Building Regulations. The Government is clear that this is the standard which should be followed and there is no mechanism for going over and above this in the plan-making system. As such, this part of Policy IN1 is superfluous and, in line with paragraph 16 of the NPPF, should be deleted.

Comments made in relation to Policy IN2 that the Plan Viability Assessment shows significant viability challenges in many parts of the borough, meaning several development types are unviable and therefore the Council should not be restricting the circumstances where it is possible to submit a site-specific viability assessment. In addition, the assumptions made in the Plan Viability Assessment in relation to policies that have s106 requirements are unclear, and in order to introduce a clawback mechanism, there must be a clear and specific policy basis imposed in line with PPG.

Other comments provided in relation to Policy IN2 include that it is important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability.

In relation to Policy IN3 the comments received were mixed, with some respondents supporting the aim of maximising social value from development and others stating that it places an unnecessary burden on developers.

### Monitoring

The Monitoring Framework needs to be more precise in terms of identifying data sources for the indicators and it needs to be more definitive in terms of actions - identifying when, why and how actions will be taken to address any issues identified. Currently, the actions in Policy M1 are imprecise and heavily caveated (for example, using 'may' instead of 'will').

### 3. Responses submitted on the Introduction Chapters

**Table I1: Responses submitted on Building a Better Oldham**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic           | Summary of Comments                                                                                                                                                                                                                                                                     |
|---------------|------------|---------------------|----------------------------|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP2       | Martyn Walker       | Lancashire Wildlife Trust  | Paragraph 3.12         | Support the approach - especially recognition that the protection, creation and enhancement of Green Infrastructure can provide multi-functional benefits that help to underpin our response to climate change and carbon reduction, whilst providing connected and resilient networks. |
| 018           | OPP175     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraphs 3.9 - 3.13  | Support the environmental targets. Look forward to seeing more information on how the Council will achieve the net zero targets laid out, in particular the 2025 target for the Council itself.                                                                                         |
| 018           | OPP176     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraphs 3.14 - 3.15 | Support the health and well-being priorities.                                                                                                                                                                                                                                           |

**Table I2: Responses submitted on the Spatial Portrait**

| Respondent ID | Comment ID | Name          | Organisation              | Policy/Topic   | Summary of Comments                                                                                                                                                                                    |
|---------------|------------|---------------|---------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP3       | Martyn Walker | Lancashire Wildlife Trust | Paragraph 5.18 | Agree with, and welcome that, the importance of the peat soils and that action to stabilise, restore and rewet deep peat soils, is required to enable it to store carbon and support notable habitats. |
| 002           | OPP4       | Martyn Walker | Lancashire Wildlife Trust | Paragraph 5.21 | Welcomes that the Plan recognises the important part Green Infrastructure plays in underpinning people's quality of life and supporting biodiversity.                                                  |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic        | Summary of Comments                                                                                                                                                                                                                                                                                                     |
|---------------|------------|---------------------|----------------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 003           | OPP32      | Simon Tucker        | Canal & River Trust        | Paragraph 5.27-5.29 | Suggests the inclusion of a paragraph that discusses the presence of active travel networks for walking and cycling in the borough. Request that the route of active travel networks, including canal towpaths, are referred to in this section which would tie into paragraph 6.5 about promoting sustainable travel.  |
| 011           | OPP92      | Emily Hycran        | Historic England           | Paragraph 5.26      | Support.                                                                                                                                                                                                                                                                                                                |
| 011           | OPP93      | Emily Hycran        | Historic England           | Paragraph 5.20      | Support.                                                                                                                                                                                                                                                                                                                |
| 018           | OPP177     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 5.2       | This reflects the ethnic diversity of the population of the borough as a whole, but not the clear distinctions between some of the districts. Believe that a more accurate portrait would give a clear understanding of how this diversity manifests differently in different areas.                                    |
| 018           | OPP178     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 5.3       | This talks about the borough's young population and is reflective of the overall average, but this does not reflect all areas as accurately. It would be clearer to show that some areas of the borough, such as Saddleworth, have a significantly higher average age than the borough as a whole.                      |
| 018           | OPP179     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 5.4       | Fails to reflect the very wide difference in health outcomes and requirements across the borough. This would reflect in a much higher proportion of issues in Saddleworth that, for example, relate to elderly care and elderly isolation, and the Local Plan should reflect on similar differences across the borough. |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------|------------|---------------------|----------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP180     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 5.5               | This talks about the typical housing in the borough, but it should be reflected that the housing makeup in Saddleworth is very different to that of the borough as a whole. A more nuanced description of the contrasts in housing stock would more clearly reflect the borough.                                                                                                                                                                                                                                                                                                                     |
| 018           | OPP181     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 5.6, 5.8 and 5.10 | The section on the economy fails to reflect the substantial contrasts across the borough, the portrait should be reworded to more accurately reflect the contrasts in different areas. Paragraph 5.10 on tourism brings this into focus, with a clear assessment of the role tourism plays specifically on the Saddleworth economy. Paragraph 5.10 has some clear omissions in the list of successful events.                                                                                                                                                                                        |
| 018           | OPP182     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 5.12 - 21         | Welcomes the extent to which these paragraphs reflect the diversity of the natural environment in the borough, in particular the complementary differences between the green spaces of the Peak District National Park, and the Northern Roots project. However, questions if there is sufficient reflection on the provision of the natural environment in the more urban areas of the town, and access to those areas listed.                                                                                                                                                                      |
| 018           | OPP183     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 5.22 - 5.26       | Welcomes the emphasis placed on the historic environment in these paragraphs. There should be a clearer emphasis placed on the boroughs conservation areas. There are 22 conservation areas across Saddleworth, but only two have had conservation area assessments, both of which are significantly out of date. There is a strong emphasis in this section on the conservation of Oldham Town Centre, and a lack of balance when reflecting on the historic environment and conservation areas across the borough. Asks for the inclusion of a new section which discuss these conservation areas. |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic             | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|------------|---------------------|----------------------------|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP184     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 5.27 - 5.29    | These paragraphs do not accurately reflect the situation for all districts. Saddleworth has one train station, no access to the Metrolink, and a heavy reliance on cars for access. Greenfield train station does not offer any direct connection to the rest of the borough, which means a very heavy reliance on the two main arterial roads which serve the area. Should one of these arterial roads and the train station be closed for a period of months, it would have a potentially catastrophic impact on traffic and local businesses, which is something that would not be clear to a developer if they were to read this section of the Local Plan as it stands. |
| 018           | OPP185     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Suggested new paragraphs | Suggest additional paragraphs on energy to reflect the success of Saddleworth Hydro as a community endeavour, and to discuss the issues of isolated residences in Saddleworth which currently rely on diesel as a main source of heating.                                                                                                                                                                                                                                                                                                                                                                                                                                    |

**No Responses were submitted on the ‘Oldham’s Local Plan and PfE’ or ‘Oldham’s Local Plan and Neighbourhood Planning’ chapters.**

## 4. Responses submitted on the Vision

**Table V1: Responses submitted on the Vision**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic                      | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|------------|---------------------|----------------------------|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP5       | Martyn Walker       | Lancashire Wildlife Trust  | Paragraph 6                       | Agree with and support the vision of responding to the biodiversity and climate change emergencies through the protection, restoration and enhancement of the natural environment. Welcome and support Oldham in seeking to be a carbon neutral exemplar with a resilient and multifunctional Green Infrastructure Network.                                                                                                                                                  |
| 007           | OPP63      | Andrew Leyssens     | United Utilities           | Vision                            | Welcomes references on responding to the climate change emergencies and being a carbon neutral exemplar with a resilient and multifunctional Green Infrastructure Network. Consider the need to respond to the climate change emergency as a 'golden thread' that should run through the Plan and guide the preparation of policy                                                                                                                                            |
| 011           | OPP94      | Emily Hycran        | Historic England           | Vision paragraph 6.9              | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 012           | OPP129     | Chris Martin        | Home Builders Federation   | Vision/ Plan Objectives generally | Generally, support the vision and plan objectives as a whole. However, where the vision states 'New homes, delivered in sustainable and accessible locations...' the Council should amend to 'New homes, delivered in sustainable and accessible locations <u>where need is located</u> ...'. This is to ensure that alongside utilising sustainable locations, that the areas identified actually spatially meet the need of the borough and are where people wish to live. |
| 018           | OPP186     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 6.3                     | Would like to draw more emphasis to Saddleworth's very different requirements to Oldham as a whole in terms of housing needs, and accessibility.                                                                                                                                                                                                                                                                                                                             |
| 018           | OPP187     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 6.5                     | Embrace this positive statement of intent but question how well it reflects reality for Saddleworth and ask whether there needs to be                                                                                                                                                                                                                                                                                                                                        |



| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic  | Summary of Comments                                                                                                                                                                                                                                                                                           |
|---------------|------------|---------------------|----------------------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                     |                            |               | a clearer ambition for dealing with the limited public transport that is a particular issue for the area.                                                                                                                                                                                                     |
| 018           | OPP188     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 6.6 | Welcome the inclusion of Uppermill and Lees in the list of centres. There should be an additional recognition of the importance of the village centres throughout Saddleworth, given their relatively isolated nature. Failing to include reference to this undermines the importance of these villages.      |
| 018           | OPP189     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 6.7 | Welcome the health ambition. It also reflects on the Parish Council's stated ambitions to support the development of a new health centre for Saddleworth. Reflect on the need for a reference to the different requirements to deliver this given the very different demography and geography of Saddleworth. |
| 018           | OPP190     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Paragraph 6.9 | Strongly commend the ambitions environmental and heritage targets.                                                                                                                                                                                                                                            |

## 5. Responses submitted on the Plan Objectives

**Table PO1: Responses submitted on the Plan Objectives**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------|------------|---------------------|----------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP193     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | PO1          | There is no reference to social housing which is an extensive part of the diverse mix of housing which is included in Policy H5 and paragraph 8.51 of the policy reasoned justification. Including a reference to social housing here would draw a much stronger connection between the objective, the policy and the policy reasoned justification.                                                                                                   |
| 018           | OPP194     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | PO3          | Welcome the references to the importance of leisure and tourism, which are particularly relevant for Saddleworth. Note the vital importance of protecting the industrial base, and employment areas in the Parish. There could be mention made of likely opportunities for growth that are particularly relevant in Saddleworth, but also elsewhere: homeworking, services and tourism, as well as to where people who are commuting outside the area. |
| 002           | OPP6       | Martyn Walker       | Lancashire Wildlife Trust  | PO5          | Welcome and support.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 018           | OPP195     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | PO5          | Welcome the objective on Local Green Spaces which is well aligned to the approach taken in the Saddleworth Neighbourhood Plan (Policy 4).                                                                                                                                                                                                                                                                                                              |
| 002           | OPP7       | Martyn Walker       | Lancashire Wildlife Trust  | PO6          | Welcome and support.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 007           | OPP64      | Andrew Leyssens     | United Utilities           | PO6          | Particularly supportive of the following element of the objective: using nature-based solutions to mitigate against, and be resilient to, climate change.                                                                                                                                                                                                                                                                                              |
| 002           | OPP8       | Martyn Walker       | Lancashire Wildlife Trust  | PO7          | Welcome and support.                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 007           | OPP65      | Andrew Leyssens     | United Utilities           | PO7          | Particularly supportive of the following elements of the objective: 'reducing the risk of flooding to people and property taking into account climate change; managing flood risk using integrated water management and the provision of multi-functional green infrastructure; promoting the efficient use of water resources and water quality; and protecting and reinstating restorable peat, allowing it to act as an important carbon sink.'                                                                                                                                                                                 |
| 011           | OPP95      | Emily Hycran        | Historic England           | PO7          | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 018           | OPP196     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | PO7          | Commend the references to the importance of the peat habitat. Feel that there could be more emphasis placed on solving existing problems, as is done in bullet points 3 and 4, throughout this objective.                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 018           | OPP197     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | PO8          | Commend PO8.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 018           | OPP198     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | PO9          | Note the strong conformity of the Saddleworth Neighbourhood Plan with PO9, in particular policies 10, 11 and 12 of the Neighbourhood Plan. Note that this objective focuses solely on the Oldham Town Centre Conservation Area Management Plan and contains no objectives with regards to the other conservation areas across the borough. The objective should include extra bullet points with a clear target of carrying out assessments on conservation areas across the borough and ensuring that they are given due consideration and protection, which would then provide consistency between the objective and Policy HE1. |
| 018           | OPP199     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | PO10         | Refer to comments made regarding paragraph 6.5 of the Plan regarding sustainable transport options in Saddleworth.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## 6. Responses submitted on the Key Diagram

**Table KD1: Responses submitted on the Key Diagram**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------|------------|---------------------|----------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 003           | OPP33      | Simon Tucker        | Canal & River Trust        | Key Diagram  | Reference to the canals on the Key Diagram would help ensure the canal network is identified by decision makers and prospective developers for canal-side development.                                                                                                                                                                                                                                                                                                                                                                 |
| 018           | OPP200     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Key Diagram  | The key shows that the future developments are an indication of the level of ward-by-ward distribution of future housing, but by placing a specific marker in a location on the map, this could give a misleading impression that a specific development will be brought forward in the locations where the markers have been placed. Instead, an accompanying table showing >1000 homes, 500–999 homes and <500 homes and a list of which wards fell into each category would be a less ambiguous way of reflecting this information. |

## 7. Responses submitted on the Homes Policies

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

The table below also includes general comments submitted regarding housing delivery.

| Respondent ID | Comment ID | Name                | Organisation                             | Policy/Topic                 | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 006           | OPP57      | Gareth Salthouse    | Emery Planning - on behalf Mr J Jaskolka | Need for an Exception policy | Request modification to the plan to include an 'exception policy' so that there is a mechanism to boost affordable housing above and beyond what can be anticipated through Policy H1 of the Plan. This is essential given the extent of affordable housing need and the limited quantum of affordable homes that could be expected to come forward in accordance with policy compliant levels at Policy H5.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 018           | OPP201     | Cllr Sam Al-Hamdani | Saddleworth Parish Council               | Whole chapter                | Broadly supportive of many of the policies contained within Chapter 8 although the policies could be strengthened, clarified and enhanced by carrying out some changes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 018           | OPP202     | Cllr Sam Al-Hamdani | Saddleworth Parish Council               | Paragraph 8.3                | <p>This paragraph is an example of how the Plan fails to adequately reflect the different needs of different areas. Amend as follows:</p> <p>"The Local Housing Needs Assessment (LHNA) (2024) has assessed current housing provision and future needs and has found that there are imbalances in the size, mix and type of new homes required across the borough to meet local housing needs, <u>as well as distinctly different housing markets in specific areas.</u></p> <p>There <del>is</del> <u>are</u> <del>also</del> increasing numbers of people at risk of, or currently experiencing, homelessness in the borough. <del>In addition,</del> <u>There is also</u> an outward migration of young people in the borough; as such there is a need to ensure there is an attractive housing offer available in the borough to retain and attract young people. There are <del>also</del> <u>specific</u> issues <u>which affect</u> <del>of overcrowding</del> in some of Oldham's neighbourhoods, <u>which include overcrowding,</u> an increased need for larger inter-generational family housing, <del>and</del> an increasing ageing population and a need for housing suitable for disabled people."</p> |

| Respondent ID | Comment ID | Name             | Organisation                                       | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|------------|------------------|----------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 001           | OPP54      | Bruce O'Brien    | Emery Planning<br>- on behalf of Oakmere Homes Ltd | Policy H1    | Suggest that site, 'Land to the rear of 69 Broadway, Oldham, OL2 5DD' could be identified as a site allocation for residential development to provide certainty for the landowners and developer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 006           | OPP55      | Gareth Salthouse | Emery Planning<br>- on behalf Mr J Jaskolka        | Policy H1    | PfE identifies a housing requirement that averages 680 dwellings per annum for Oldham. However, the latest standard method figure is 925 dwellings per annum. The housing requirement for the emerging Local Plan should reflect the latest standard method figure to ensure that the Plan is positively prepared and reflects national planning policy guidance. It is essential that the Plan include an exception policy that is permissive of edge-of-settlement sites coming forward for much-needed affordable housing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 007           | OPP66      | Andrew Leyssens  | United Utilities                                   | Policy H1    | Requested the 2025 land supply data from the GMCA and when this is available will undertake a high-level review of the land supply and send back any comments / concerns.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 013           | OPP148     | Stephen Harris   | Emery Planning<br>- on behalf of Mr Lumb           | Policy H1    | Plan period will need to be extended to 2042 as a minimum. The Council is heavily reliant on SHLAA sites without planning permission. The indicative five-year housing land supply above shows that the Council would demonstrate 6.7 years housing land supply at adoption, but there are a number of factors which mean that this will not be the case. It is crucial that the deliverability of the supply for the first five years from adoption is thoroughly interrogated. Whilst the PfE allocations will increase the deliverable supply, consider that a greater number of non-strategic allocations are required. GMCA were clear at the PfE examination that the PfE does some of the 'heavy lifting' in terms of allocating sites and Green Belt release, but by no means all of the 'heavy lifting'. GMCA also accepted that if the supply turned out to be insufficient to meet the housing requirements, it may be necessary to release further sites from the Green Belt. The release of this site from the Green Belt is justified for the purposes of the NPPF. |

| Respondent ID | Comment ID | Name         | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 012           | OP130      | Chris Martin | Home Builders Federation | Policy H1    | <p>Under the amended the Standard Method for calculating Local Housing Need (LHN), Oldham's LHN is now 928 a year which is a 36.5% increase on the PfE figure. Given that this is the case and that there is a clear steer from the Government to provide a step change in housing delivery, the HBF considers that notwithstanding the need for conformity with the PfE DPD, the Council should be doing all it can to try and meet its current LHN. As the housing requirements are set as minima, doing so should not necessarily conflict with the PfE DPD in any event. The Council should also extend the plan period out to at least 2042, so as to meet the minimum requirement of a 15-year plan period from adoption of the Plan (NPPF paragraph 22). Given the change in circumstances since the adoption of the PfE (namely the new Standard Method), the most recent LHN should be used to extend the plan period (i.e. 928dpa).</p> <p>The use of Greater Manchester Accessibility Level (GMAL) level 4 results in crude 'pass/fail' system based. This part of the policy should provide added flexibility which takes into account the GMAL score of a site but allows for a further level of site-specific analysis to test the quality of routes and potential to improve transport infrastructure and other measures in the area.</p> <p>Comments on the lack of site allocations - there is a need to allocate sites to demonstrate deliverability of the land supply and provide certainty to developers; NPPF requires that 10% of the authorities housing requirement should be demonstrated on sites less than 1 hectare, it will be difficult to demonstrate this without allocating sites and may disincentivise small and medium sized builders. The reasoned justification sets out sources of supply/ suitable sites for development including SHLAA and Brownfield Register, as such why can sites not be allocated from these sources.</p> |

| Respondent ID | Comment ID | Name                | Organisation                                    | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 014           | OPP149     | Stephen Harris      | Emery Planning - on behalf of Sheridan Group    | Policy H1    | Plan period will need to be extended to 2042 as a minimum. The Council is heavily reliant on SHLAA sites without planning permission. The indicative five-year housing land supply above shows that the Council would demonstrate 6.7 years housing land supply at adoption, but there are a number of factors which mean that this will not be the case. It is crucial that the deliverability of the supply for the first five years from adoption is thoroughly interrogated to ensure that the housing needs will be met and that the supply will not be challenged during this period. Whilst the PfE allocations will increase the deliverable supply, we consider that a greater number of non-strategic allocations are required. GMCA were clear at the PfE examination that the PfE does some of the 'heavy lifting' in terms of allocating sites and Green Belt release, but by no means all of the 'heavy lifting'. GMCA also accepted that if the supply turned out to be insufficient to meet the housing requirements, it may be necessary to release further sites from the Green Belt. Parcel 1 of this site is allocated in PfE (JPA13) and is under construction. This representation is concerned with parcels 2 and 3 which are located to the southern edge of the existing built-up area of Woodhouses and would comprise small-scale and logical urban extensions. |
| 016           | OPP153     | Stephen Harris      | Emery Planning - on behalf of Redwaters Estates | Policy H1    | The housing requirement for the emerging Local Plan should reflect the latest standard method figure to ensure that the Plan is positively prepared and reflects national planning policy guidance. This will also help to address the substantial affordable housing shortfall across the borough. It is essential that the Plan includes an exception policy that is permissive of edge-of-settlement sites coming forward for much-needed affordable housing. Policy H1 should include reference to housing coming forward in accordance with such a policy given the extent of unmet affordable housing need across the borough                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 018           | OPP203     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                      | Policy H1    | The title of this policy does not accurately reflect the policy set out. The diverse housing mix is addressed in Policy H3, and Policy H1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |



| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|               |            |             |                                                                |              | only refers to sustainability in terms of sustainable and accessible locations. Recommend that the policy be renamed: Housing delivery. Also note that the last paragraph of Policy H1 might be considered more relevant to Policy H2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 025           | OPP295     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy H1    | General support to Policy H1 and how it supports the delivery of the development sites allocated under PfE. Notes that PfE provides a detailed evidence based strategy for meeting housing needs and sustainable growth across Oldham, as such, it is important that the emerging Local Plan supports the delivery of the established housing requirements and spatial strategy established through PfE, and ensures that policies facilitate the delivery of the strategic allocations identified within the adopted Development Plan. The Beal Valley and Broadbent Moss allocations represent significant and deliverable sources of housing supply within the borough over the plan period through joint public and private sector investment. As detailed within the Council's Housing Topic Paper, a substantial proportion of anticipated housing delivery is reliant on PfE allocations. In the context of the amended standard methodology for calculating local housing need, future reviews of Oldham's housing requirement will need to take account of the updated standard method and the direction of travel within national planning policy towards higher levels of housing delivery. It would be appropriate for the Council to commit to an early review of the Local Plan following adoption. Such a review would allow the Council to consider whether the housing requirement and spatial strategy remain consistent with national policy and with any updated assessment of housing need derived from the revised standard method. Specific comments made on the housing topic paper/ SHLAA/ housing land supply. |

| Respondent ID | Comment ID | Name        | Organisation                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 026           | OPP318     | Cait O'Dowd | Ashton Hale on behalf of Saddleworth Property Partnership | Policy H1    | The figures detailed within Policy H1 are adapted from PfE Policy JP-H1 Table 7.2 and as such are dated and have been calculated using an out-of-date method. Given this evolving policy context, it would be essential for the Council to commit to an early review of the Local Plan following adoption. Such a review would allow the Council to consider whether the housing requirement and spatial strategy remain consistent with national policy and with any updated assessment of housing need derived from the revised standard method. An early review of the Local Plan will be essential if Oldham's housing requirement falls short of the local housing need calculated by the updated standard method. Sites such as Saddleworth Business Centre represent a logical and sustainable opportunity for future housing delivery, particularly in the short to medium term.                                                                                                                                                                                                                                                                                                                              |
| 028           | OPP328     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd     | Policy H1    | General support for the policy and how it supports the delivery of the development sites allocated under PfE. It is important that the emerging Local Plan supports the delivery of the established housing requirements and spatial strategy established through PfE and ensures that policies facilitate the delivery of the strategic allocations identified within the adopted Development Plan. Welcomes that the figure (11,560 new dwellings) is recognised as a minimum requirement over the Plan period. The Beal Valley allocation represents significant and deliverable sources of housing supply within the borough over the plan period through joint public and private sector investment. Future reviews of Oldham's housing requirement will need to take account of the updated standard method and the direction of travel within national planning policy towards higher levels of housing delivery. Welcome the Local Plan's recognition that the delivery of PfE strategic allocations forms a key component of the borough's housing supply. Policy wording could however be more explicit that housing delivery will be focused on the implementation of these allocations and that proposals |

| Respondent ID | Comment ID | Name        | Organisation                                                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|               |            |             |                                                                                           |              | consistent with them will be supported in principle and be a priority in terms of infrastructure support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 029           | OPP337     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd                                     | Policy H1    | Welcomes that the figure (11,560 new dwellings) is recognised as a minimum requirement over the Plan period. In this context, future reviews of Oldham's housing requirement will need to take account of the updated standard method and the direction of travel within national planning policy towards higher levels of housing delivery. The Council could take a more proactive approach to meeting future housing development by identifying additional land at this juncture, rather than waiting for a future Local Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 030           | OPP349     | Cait O'Dowd | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Policy H1    | The figures detailed within Policy H1 are adapted from PfE Policy JP-H1 Table 7.2 and as such are dated and have been calculated using an out-of-date method. Given this evolving policy context, it would be essential for the Council to commit to an early review of the Local Plan following adoption. This would allow the Council to consider whether the housing requirement and spatial strategy remain consistent with national policy and with any updated assessment of housing need derived from the revised standard method. An early review of the Local Plan will be essential if Oldham's housing requirement falls short of the local housing need calculated by the updated standard method. Sites such as Bee Mill represent a logical and sustainable opportunity for future housing delivery, particularly in the short to medium term, given the availability of existing infrastructure and services. The Local Plan should recognise Bee Mill as a suitable and viable location for residential development to help meet housing needs. Accordingly, the site should be released from its current employment designation |

| Respondent ID | Comment ID | Name        | Organisation                                          | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 031           | OPP359     | Cait O'Dowd | Ashton Hale on behalf of Prestigious Homes North West | Policy H1    | <p>The figures detailed within Policy H1 are adapted from PfE Policy JP-H1 Table 7.2 and as such are dated and have been calculated using an out-of-date method. Given this evolving policy context, it would be essential for the Council to commit to an early review of the Local Plan following adoption. This would allow the Council to consider whether the housing requirement and spatial strategy remain consistent with national policy and with any updated assessment of housing need derived from the revised standard method. An early review of the Local Plan will be essential if Oldham's housing requirement falls short of the local housing need calculated by the updated standard method. Sites such as those held by Prestigious Homes represent a logical and sustainable opportunity for future housing delivery, particularly in the short to medium term, given the availability of existing infrastructure and services. The Local Plan should recognise these sites as suitable and viable locations for residential development to help meet housing needs. Accordingly, the sites should be viewed as key locations for development, despite their current Green Belt designations. Request that the plan be amended to allocate sites, as such request a proposed modification to policy to add paragraph as follows: <u>"The Council will support the redevelopment of Green Belt land in sustainable and accessible locations for housing, particularly where such sites are no longer serve Green Belt purposes and a justified housing need can be presented."</u></p> |

| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 032           | OPP370     | Cait O'Dowd    | Ashton Hale on behalf of Andy Hulme | Policy H1    | <p>The figures detailed within Policy H1 are adapted from PfE Policy JP-H1 Table 7.2 and as such are dated and have been calculated using an out-of-date method. Given this evolving policy context, it would be essential for the Council to commit to an early review of the Local Plan following adoption. This would allow the Council to consider whether the housing requirement and spatial strategy remain consistent with national policy and with any updated assessment of housing need derived from the revised standard method. An early review of the Local Plan will be essential if Oldham's housing requirement falls short of the local housing need calculated by the updated standard method. Sites such as those at Standedge Road represent a logical and sustainable opportunity for future housing delivery, particularly in the short to medium term, given the availability of existing infrastructure and services. The Local Plan should recognise these sites as suitable and viable locations for residential development to help meet housing needs. Accordingly, the sites should be viewed as key locations for development, despite their current Green Belt designations. Request that the plan be amended to allocate sites, as such request a proposed modification to policy to add paragraph as follows: <u>"The Council will support the redevelopment of Green Belt land in sustainable and accessible locations for housing, particularly where such sites are no longer serve Green Belt purposes and a justified housing need can be presented."</u></p> |
| 033           | OPP380     | Michael Parham | Taylor Wimpey                       | Policy H1    | <p>The Inspectors' Examination Report on PfE sets out the role of PfE and the relationship with Local Plans. Local Plans are expected to allocate sites for residential development, in addition to the strategic allocations in the Plan, looking ahead at least 15 years from the adoption of the Plan. This is compounded in PfE paragraph 1.56. Paragraph 2.42 of the Housing Topic Paper also incorrectly states that Policy JP-H1 of PfE outline the housing requirement over the plan period 2022-2039. In accordance with the Inspector's comments and paragraph 22 of the NPPF (2021) strategic policies</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|               |            |      |              |              | <p>are expected to look ahead a minimum period of 15 years from their adoption not the adoption of the PfE. If adoption of the Local Plan is Spring 2027, the housing requirement set out under draft Policy H1 should include housing up to 2042.</p> <p>To inform the minimum Local Plan requirements for the unaccounted period of 2039-2042 PfE states that the annualised figure of 680 homes should be used (as a minimum). The SHLAA and the draft Local Plan identify land for a total of 506 homes beyond 2039, however this is substantially less than the minimum requirement of 680 homes per year which would equate to a total of 2,040 homes required for the years 2039-2042.</p> <p>From 22nd March 2029 onwards the LHN will apply and the housing requirement for Oldham will increase significantly. It will be highly likely at this stage that the Council will struggle to identify a sufficient supply of land. The Council should therefore review its housing land supply to allow greater flexibility in the Plan. Given the change in circumstances since the adoption of the PfE, namely with the introduction of the new Standard Method, it would be more appropriate to use the most recent local housing need across the extended plan period. This will ensure the Policy is positively prepared and consistent with national policy. In March 2026 new affordability ratios were published, which means Oldham's Local Housing Need figure increased to 967 homes. This figure should be used to support plan-led growth, giving an annualised requirement of 967 homes which equates to a total additional requirement of 2,901 homes to account for the plan period up to 2042. Policy H1 must be revisited to find additional sites to support the delivery of an additional 2,395 homes.</p> |

| Respondent ID | Comment ID | Name           | Organisation  | Policy/Topic         | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 033           | OPP381     | Michael Parham | Taylor Wimpey | Policy H1/ Plan wide | Accepts the distinction between the allocations in the PfE and the abstention of allocations in the Oldham Local Plan, however, this should not preclude the Local Plan from allocating additional housing sites if they are required. This would assist in clearly demonstrating the land supply over the requisite plan period and provide certainty for prospective developers looking to deliver new homes. As already discussed, Policy H1 has a shortfall of approximately 2,395 homes, therefore there is a clear need to allocate sites in the Plan to make it sound and meet the tests of soundness. If the Council does not identify and allocate sufficient sites to meet its identified needs, it risks being found unsound at Examination. It is also worth noting that in the event that Oldham cannot demonstrate a sufficient supply of housing land, there is a real risk of speculative planning applications being submitted running a grey belt case.                                                                                                                                   |
| 033           | OPP382     | Michael Parham | Taylor Wimpey | Policy H1            | Support the principle that new residential development should be situated in accessible locations, the GMAL score should not be used as a strict tool for assessing the accessibility of development sites upon which decision-makers consider a proposal as a pass or fail. GMAL is a supplementary tool for assessing the current accessibility of sites but does not consider the future infrastructure improvements which could potentially improve the sustainability of sites. In addition, it does not consider high-quality walking and cycling routes, along which people may be willing to travel extended distances as a result of the routes quality and recreational value. As such it may limit the number of residential sites which are considered sustainable and come forward, altogether impacting the effective delivery of housing in Oldham. Therefore, Policy H1's reference to residential developments being in sustainable and accessible locations should be amended to provide flexibility and ensure that the delivery of residential development in the borough is supported. |

| Respondent ID | Comment ID | Name          | Organisation                         | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 035           | OPP386     | Alexis De Pol | Depol on behalf of Rowland Homes Ltd | Policy H1    | Of those sites identified in Appendix 1 (Housing Topic Paper) as having extant planning permission, 34 have GMAL scores of 3 or under and the PfE allocated strategic sites totalling over 2,200 dwellings are also primarily identified as having GMAL scores of 3 and under. These are all sites which were clearly considered to be in sufficiently sustainable and accessible locations for residential development despite not having GMAL scores of 4 and above. Moreover, Appendix 1 includes windfall sites without planning permission and within this category sites identified as having GMAL scores of 3 or under contribute 1,442 dwellings towards the suggested supply over the plan period. This equates to just under 34% of the identified supply from this source. Given that the Local Plan's housing strategy is reliant on these windfall sites coming forward to meet the minimum housing requirement, the need in Policy H1 for all proposed residential development to have a GMAL score of 4 or above appears somewhat restrictive.                                                             |
| 035           | OPP387     | Alexis De Pol | Depol on behalf of Rowland Homes Ltd | Policy H1    | The Local Plan fails to meet NPPF paragraph 69 requirements in relation to a deliverable supply. Moreover, the strategy of the Plan to rely on the PfE strategic housing allocations and windfall sites does not meet the overriding objective of NPPF paragraph 60 to significantly boost the supply of homes and ensure a sufficient amount and variety of land can come forward where it is needed. The Housing Topic Paper explains why the Council has not identified housing allocations, quoting NPPF paragraph 76 and stating that at the time of anticipated adoption PfE will still be less than five years old and it identified a five-year supply of specific deliverable sites. Firstly, paragraph 76 of NPPF relates to decision making not Local Plan preparation. With regards to Local Plan preparation paragraph 69 requires planning policies to identify a sufficient supply of deliverable sites for the five years following the intended date of adoption. Secondly, PfE does not set out to identify a sufficient supply of specific, deliverable sites for each authority to the extent that it |



| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|               |            |      |              |              | <p>removes the requirement for their Local Plans to comply with NPPF paragraph 69. PfE confirms that it does not cover everything that a Local Plan would and that individual districts need to take forward Local Plans to set out more detailed policies, including both strategic and non-strategic policies. The PfE Inspector's report confirms in paragraph 790 that other than the supply from the strategic allocations the other sources of supply identified in Table 7.1, amounting to a total of around 170,000 dwellings across the GM Authorities, are not proposals in the Plan but rather existing commitments and potential opportunities that will be considered by individual Local Planning authorities through their Local Plans. Paragraph 161 of the report also states that it was not necessary for the Inspectors to consider the detailed content of the SHLAAs as that is a matter for individual Local Plans.</p> <p>Thirdly, whilst the NPPF24 transitional arrangements state that the preparation of the OLP is to be examined against the policies of NPPF23 this is not the case for decision making purposes. It is also relevant to note that the updated NPPF24 no longer contains the provisions in NPPF23 paragraph 76 which precludes local authorities from having to demonstrate a deliverable five-year housing supply for the first five years following adoption.</p> <p>Furthermore, under the terms of paragraph 78 of NPPF24, on 21st March 2029, which is the fifth anniversary of PfE, the Council will have to maintain a deliverable five-year housing supply based on the much higher LHN using on the revised standard method. It is also considered that PfE Policy JP-H1 acknowledges such a scenario. For the plan to be considered sound its policies must be consistent with the NPPF. It must also clearly be able to deliver the minimum housing requirement set by PfE and with sufficient flexibility to ensure that a choice and variety of land can come forward where it is needed.</p> |

| Respondent ID | Comment ID | Name          | Organisation                            | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 036           | OPP392     | Halyey Knight | HK Planning on behalf of Unearthed Land | Policy H1    | <p>Policy H1 and the associated Local Plan Policies Map are not considered to be sound as they have not been positively prepared. The Publication Local Plan makes it clear that there is an 'ever-increasing need for housing' in Oldham which has led to 'a shortage of suitable housing to meet local needs'. Despite this acknowledgement the plan does not allocate any land for future housing development. References to the SHLAA/ Brownfield Register as sources of housing supply in the Reasoned justification is not policy, and therefore this wording does not provide any security to Developers considering delivering new homes in Oldham.</p> <p>The Council's housing land supply comprises of 3,251 units on 'potential and pending sites', which the council consider to be suitable but do not benefit from planning permission nor an allocation for a future housing use. This represents 36% of the Council's 0–10-year land supply, which is on land that the development industry have no comfort that the Council would support at application stage as it does not benefit from an allocation. 512 units in the 0–15-year period that are classified as 'lapsed and stalled sites' which have, or have had, the benefit of planning permission previously but are no longer under construction. Given that planning permissions are hard to obtain currently, and the requirement on applicants is increasing and that the housing market is fairly buoyant and stable at the moment, any sites that do not progress to implementation should be reviewed and discounted accordingly from the housing land supply. 7,462 new homes of the Council's land supply are on land that have no extant planning permission nor are they under construction this represents 60% of the Council's housing land supply.</p> <p>The Local Plan is therefore not considered to be meeting the borough's objectively assessed needs for new homes, as it does not include housing allocations to ensure that the housing requirements set out in PfE can be met over the plan period. The</p> |

| Respondent ID | Comment ID | Name               | Organisation                     | Policy/Topic                              | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|               |            |                    |                                  |                                           | <p>Council have not justified why they have chosen to defer the allocation of housing sites to a later document. This is not the approach that has been taken with business and employment sites, which are identified on the Local Plan Policies Map. Policy H1 is therefore not considered to be positively prepared as required by NPPF.</p> <p>State that the Council should allocate land for future housing development in order to be able to demonstrate that the Publication Local Plan can be found sound. The Publication Local Plan includes a number of removed designations, include 'other protected open land' which could provide a boost to the supply of housing land is developers were given a chance to promote land and obtain allocations for suitable sites.'</p> |
| 043           | OPP413     | Sebastian Tibenham | Pegasus Group on behalf of DWFCO | Policy H1 - lack of allocations           | <p>The Oldham Local Plan does not propose any housing allocations and the Reasoned justification which accompanies the policy outlines that the SHLAA and Brownfield Register provide details of sites considered suitable, available and achievable for residential development, and should be used as a starting point to identify potential development sites. Query why such sites cannot be allocated so as to give them development plan status, to demonstrate that the Council is proactively attempting to boost housing supply in the borough and to provide confidence for the development industry. There is a clear need to allocate sites in the plan to ensure that it is positively prepared, effective and that development is appropriately plan-led in nature.</p>      |
| 043           | OPP414     | Sebastian Tibenham | Pegasus Group on behalf of DWFCO | Policy H1 - Five-year housing land supply | <p>Do not consider the Council have addressed the obligation from NPPF to have a deliverable five-year supply of housing backed up with sufficient evidence. Representation sets out a number of dwellings that should be removed from the five-year supply but note that the position may evolve prior to the Examination in Public and therefore reserve the right to provide additional evidence on the above position through any future hearing statements.</p>                                                                                                                                                                                                                                                                                                                       |

**Table H2: Responses submitted on Policy H2 Density of New Housing**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| 011           | OPP96      | Emily Hycran        | Historic England           | Policy H2    | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 012           | OPP131     | Chris Martin        | Home Builders Federation   | Policy H2    | PfE Policy JP-H4 is flexibly worded in that development should 'have regard' to the densities set out in the policy. As such Policy H2 should be reworded to reflect this flexibility. Exceptions to the minimum densities in the policy should be widened to include market aspirations, viability, deliverability and accessibility. The Council need to consider, through its evidence, the approach to density in relation to other policies in the plan e.g. open space, SuDS, trees, biodiversity net gain, cycle and bin storage, housing mix, space standards, accessible and adaptable dwellings, parking and energy efficiency, which will impact upon which density can be delivered onsite. It is not apparent from the evidence base the degree to which this has been taken into account, and this is required to justify this policy. Gross and net developable area definitions should also be set out - suggest this is tied to a specific industry standard i.e. RICS. |
| 018           | OPP204     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy H2    | Policy makes no distinction between urban and rural centres, and there is no reference to village centres outside of Uppermill. Has full consideration has been given to housing density in other rural centres. It could be the case that there should be a further category in the table of rural centres, with specific density targets. Strongly contest the use of the term "frequent" in relation to train services to Greenfield train station. Depending on the time and day of the week, services are limited to only one or two an hour.                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 022           | OPP267     | Matthew Broadbent   | Save Royton's Green Belt   | Policy H2    | The permitted exceptions need to be supported by evidence to be justified - this should be incorporated directly into the policy. Modification to policy suggested as follows: "The Council will assess this on a site-by-site basis and only allow exceptions where necessary <u>and fully evidenced</u> ."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| 025           | OPP297     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy H2    | The exceptions provided in H2 which allow for flexibility in terms of density are welcomed by the consortium. It is considered the policy could however be bolstered by referencing that alternative densities will be considered acceptable were identified in endorsed masterplans / Supplementary Planning Documents, or their subsequent equivalents.                                                                                                                                                                                                                                                                                |
| 026           | OPP319     | Cait O'Dowd | Ashton Hale on behalf of Saddleworth Property Partnership      | Policy H2    | The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported. Whilst the PfE density assumptions provide an important strategic benchmark, the Local Plan should retain sufficient flexibility to allow density to increase where appropriate. Accordingly, the Local Plan should ensure that density policies do not operate as a constraint where higher densities would be appropriate in design, transport or sustainability terms.                                                                                                                                       |
| 028           | OPP329     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd          | Policy H2    | The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported however, these densities should not restrict development coming forward in circumstances where site specific characteristics do not allow these figures to be achieved. The exceptions provided in H2 which allow for flexibility in terms of density are welcomed. It is considered the policy could however be bolstered by referencing that alternative densities will be considered acceptable where identified in endorsed masterplans / Supplementary Planning Documents, or their subsequent equivalents. |
| 029           | OPP338     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd          | Policy H2    | The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported however, these densities should not restrict development coming forward in circumstances where site specific characteristics do not allow these figures to be achieved. The exceptions provided in H2 which allow for flexibility in terms of density are welcomed by GdeG.                                                                                                                                                                                                                                      |

| Respondent ID | Comment ID | Name          | Organisation                                                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 030           | OPP350     | Cait O'Dowd   | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Policy H2    | The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported. The Local Plan should retain sufficient flexibility to allow density to increase where appropriate. Accordingly, the Local Plan should ensure that density policies do not operate as a constraint where higher densities would be appropriate in design, transport or sustainability terms.                                                                                                                                                                                                                                         |
| 031           | OPP360     | Cait O'Dowd   | Ashton Hale on behalf of Prestigious Homes North West                                     | Policy H2    | The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported. The Local Plan should retain sufficient flexibility to allow density to increase where appropriate. Accordingly, the Local Plan should ensure that density policies do not operate as a constraint where higher densities would be appropriate in design, transport or sustainability terms.                                                                                                                                                                                                                                         |
| 032           | OPP371     | Cait O'Dowd   | Ashton Hale on behalf of Andy Hulme                                                       | Policy H2    | The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported. The Local Plan should retain sufficient flexibility to allow density to increase where appropriate. Accordingly, the Local Plan should ensure that density policies do not operate as a constraint where higher densities would be appropriate in design, transport or sustainability terms.                                                                                                                                                                                                                                         |
| 044           | OPP417     | Edward Taylor | CPRE                                                                                      | Policy H2    | The Local Plan should ensure that density policies do not operate as a constraint where higher densities would be appropriate in design, transport or sustainability terms. Suggest adding text to paragraph one to read: "...In line with PfE Policy JP-H4, new residential developments should achieve the minimum densities set out in Table H2 below <u>but in urban areas, especially near to public transport nodes, higher densities will be supported where they are well designed and appropriate taking into consideration housing needs, local character and appropriate building forms and can be achieved without causing harm to amenity.</u> " |

**Table H3: Responses submitted on Policy H3 Housing Mix**

| Respondent ID | Comment ID | Name            | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 007           | OPP67      | Andrew Leyssens | United Utilities         | Policy H3    | Request the following additional wording is added to the final sentence of this policy: <u>“Proposals for self-build and custom housing plots must be built in line with a site-wide infrastructure strategy for foul, surface water and clean water. Fragmented approaches to infrastructure delivery will not be acceptable where sites are part of a wider site.”</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 012           | OPP132     | Chris Martin    | Home Builders Federation | Policy H3    | Recommends a more flexible approach is taken regarding housing mix which recognises that: needs and demands will vary by area and site; to ensure scheme viability; and to provide an appropriate mix for the location and market. The percentage range in Table H3 is too narrow and is unrealistic that such ranges apply to all sites in the borough. Also, the amount of bungalows/ level access homes required in Table H3 is unjustified as the evidence in the LHNA is not consistent with the levels sought in Table H3 - future housing needs for older people vary greatly. Furthermore, a requirement exists in PfE JP-H3 for all new homes to be built to M4(2) standard which require step-free level access homes and for homes to be adaptable to meet the needs of older people, as such having this as a separate requirement in H3 is unjustified and superfluous. The Council will also need to explain how the requirement for bungalow provision at the levels required on development sites matches with the density requirements in Policy H2 - it is unclear how the requirement can be met whilst also fulfilling Policy H2. |

| Respondent ID | Comment ID | Name                | Organisation                                                             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 018           | OPP205     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                               | Policy H3    | Suggest that the title of the policy would more appropriately be “A diverse housing mix”. Table H3 is not included as part of the policy, but Table H2 is included as part of the policy in H2. Given that Policy H3 cannot be read without the information contained in Table H2, suggest that Table H2 is moved to be included within the policy. Support the inclusion of self-build and custom housebuilding. Note the reference in paragraph 8.18 to the breakdown of housing in different districts as laid out in the LHNA but note that this is not referenced in Policy H3. Particularly bearing in mind the very different housing markets, of which Saddleworth is one example, this breakdown and requirements should be explicitly referenced in Policy H3. The heading “Bungalows and Level-access Homes” should be kept together with the accompanying text. |
| 022           | OPP268     | Matthew Broadbent   | Save Royton’s Green Belt                                                 | Policy H3    | Requiring evidence for only some of the criteria, undermines the others where it is not explicitly required. A modification is suggested for criterion 4 so that it mirrors the wording in criterion 1, as follows: “4. <u>It can be clearly evidenced</u> <del>There</del> there is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.”                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 023           | OPP283     | Natasha Styles      | The Planning Bureau on behalf of McCarthy and Stone and Churchill Living | Policy H3    | Support the policy in its recognition at point 3 that the developments for specialist accommodation, such as for older and/ or disabled people will have an alternative housing mix to that detailed within the policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |



| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| 025           | OPP298     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy H3    | The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains viable and deliverable and that housing mix should not be restricted to the mix set out in Table H3. Suggest criterion 2 should list viability as one of the 'distinct characteristics'. Strategic allocations will be delivered over the Plan period and potentially beyond and will involve multiple development parcels, housebuilders and phases of development. As such, it will be necessary for the detailed housing mix to respond to a range of factors including site design, market demand, infrastructure provision and viability considerations. Flexibility will be key. |
| 026           | OPP320     | Cait O'Dowd | Ashton Hale on behalf of Saddleworth Property Partnership      | Policy H3    | The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains deliverable and that housing mix should not be restricted to the mix set out in Table H3. Where it can be demonstrated through the planning application process that strict adherence to the housing mix set out in Policy H3 would adversely impact development viability, the policy should allow sufficient flexibility for an alternative mix to be delivered.                                                                                                                                                                                                                     |
| 028           | OPP330     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd          | Policy H3    | The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains viable and deliverable and that housing mix should not be restricted to the mix set out in Table H3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Respondent ID | Comment ID | Name        | Organisation                                                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                               |
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| 029           | OPP339     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd                                     | Policy H3    | The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains viable and deliverable and that housing mix should not be restricted to the mix set out in Table H3. |
| 030           | OPP351     | Cait O'Dowd | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Policy H3    | The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains deliverable and that housing mix should not be restricted to the mix set out in Table H3.            |
| 031           | OPP361     | Cait O'Dowd | Ashton Hale on behalf of Prestigious Homes North West                                     | Policy H3    | The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains deliverable and that housing mix should not be restricted to the mix set out in Table H3.            |
| 032           | OPP372     | Cait O'Dowd | Ashton Hale on behalf of Andy Hulme                                                       | Policy H3    | The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains deliverable and that housing mix should not be restricted to the mix set out in Table H3.            |

| Respondent ID | Comment ID | Name           | Organisation  | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 033           | OPP383     | Michael Parham | Taylor Wimpey | Policy H3    | Generally supportive of the need for a mix of house types on residential developments. Some concern with the ranges provided in Table H3 and consider that additional flexibility should be provided within the policy to allow site-specific considerations to be taken into account. Table H3 provides narrow ranges for the percentage of each house type/size, with only a 5% leeway, which is an unrealistic range that will be inappropriate for all sites in the borough. Criterion 2 of draft Policy H3 sets out the examples of site-specific considerations that will be accepted, including include flood risk, design context, impact on heritage assets. Rather than applying a very prescriptive approach to housing mix, the policy should allow for greater flexibility to ensure it is effective and positively prepared. It is also worth bearing in mind that there will be a large number of sites that come forward in an authority area which are small or will deliver a large number of smaller units, particularly urban sites. Therefore, applying limited flexibility on housing mix to larger greenfield sites will simply result in a disproportionate number of smaller units being delivered across an authority area which is below the needs identified in the LHNA overall. |

**Table H4: Responses submitted on Policy H4 Providing for Local Housing Needs**

| Respondent ID | Comment ID | Name           | Organisation                                       | Policy/Topic | Summary of Comments                                                                                                                                                                             |
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| 016           | OPP154     | Stephen Harris | Emery Planning<br>- on behalf of Redwaters Estates | Policy H4    | The emerging Local Plan should include an 'exception policy' such that there is a mechanism to boost affordable housing above and beyond what can be anticipated through Policy H1 of the Plan. |

| Respondent ID | Comment ID | Name                | Organisation                                    | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| 012           | OPP133     | Chris Martin        | Home Builders Federation                        | Policy H4    | Housing for older people often have their own viability considerations which should be reflected in the Local Plan viability assessment, with then separate policy requirements to reflect these differences. It is not apparent from the Viability Assessment that this work has been undertaken - this undermines the policy. Recommend that the Council should be more proactive in working with providers of this type of development. This approach would provide more certainty that the need will be met in full. The Reasoned justification identifies a requirement for 5% of new dwellings to be built to M4(3) wheelchair accessible standard although this is not translated into any policy text - clarification is required in this respect.                                                                                                                                                                                                                                                                                                                                                               |
| 018           | OPP206     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                      | Policy H4    | Broadly supportive of this policy, but the policy does not just refer to local but also to specific types of needs, which could be reflected in the title of the policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 027           | OPP327     | Peter Marshall      | Greater Manchester Coalition of Disabled People | Policy H4    | Greater Manchester Coalition of Disabled People (GMCDP) proposes that all Local Plans in Greater Manchester should include a requirement to build all new private and social housing developments to Building Regulation M4(2) standard and 10% to Building Regulation M4(3) wheelchair accessible standard. This will help to address the current shortage of wheelchair-accessible homes. Disappointing to read that the Local Plan only proposes a requirement for 5% of new private and social housing developments to be built to an M4(3) wheelchair-accessible standard. There is a need for housing for people with disabilities and mobility requirements. Whilst it is positive that the need for supported housing is recognised in the Plan, many disabled people do not wish to live in 'specialist' forms of housing provision. Instead, an adequate supply of decent quality, well-designed accessible ordinary housing can enable many more disabled people to live in their own homes in their chosen area which can have long term effects on health, employment and involvement in local communities. |

**Table H5: Responses submitted on Policy H5 Affordable Housing**

| Respondent ID | Comment ID | Name             | Organisation                                       | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| 006           | OPP56      | Gareth Salthouse | Emery Planning<br>- on behalf Mr J Jaskolka        | Policy H5    | The PfE requirement is only marginally above the identified affordable housing need figure for the borough. This illustrates the need in itself for aligning the housing requirement for the emerging Local Plan with the latest standard method figure for the borough. Suggest the Council explores alternative strategies for significantly boosting the supply of affordable housing. The Plan should also set out a permissive 'exception' policy in order to boost the supply of affordable housing. In the absence of an exception policy and/or pursuing an alternative strategy there is no mechanism for making a meaningful contribution towards meeting affordable housing needs and the emerging Local Plan will only serve to entrench the borough's housing crisis.                                                                                                                                                                                                              |
| 016           | OPP155     | Stephen Harris   | Emery Planning<br>- on behalf of Redwaters Estates | Policy H5    | PfE affordable housing requirement is only marginally above the identified need for the borough. This illustrates the need for aligning the housing requirement for the emerging Local Plan with the latest standard method figure. The policy requirement for between 10% and 25% of major housing schemes based on 680 no. dwellings per annum falls very far short of what is required to make a meaningful contribution to addressing affordable housing needs. Suggest the Council explores alternative strategies for significantly boosting the supply of affordable housing, including, boosting overall housing requirement such that it reflects the latest standard method and justifies more viable edge-of-settlement greenfield sites for development over the plan-period that are able to accommodate greater levels of affordable housing in viability terms. The Plan should also set out a permissive 'exception' policy in order to boost the supply of affordable housing. |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 012           | OPP134     | Chris Martin        | Home Builders Federation   | Policy H5    | <p>The LHNA identifies an affordable housing need of 669 per year which is just short of the overall housing requirement stated in Policy H1 of the Local Plan (680). It is therefore clear that the number of affordable homes that are planned to be delivered through the Local Plan is capped as a result of viability. This is permitted through paragraph 35 of the NPPF; however, PPG outlines that an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes.</p> <p>The Local Plan Viability Assessment clearly outlines the viability challenges apparent across the borough. The issue is then compounded by Policy H5 not including an option for applicants to negotiate affordable housing requirements in instances where it would not be viable to provide a policy compliant amount - this needs to be included to be effective. Whilst the broad tenure split matches the LHNA, the LHNA assumes that the affordable home ownership will include First Homes. As there is no longer a mandatory requirement for First Homes in NPPF it is unclear whether the Council will still be requesting this - this requires further explanation. There should be a degree in flexibility in the precise split in affordable tenures to take into account site specific viability considerations and also in the event that a Registered Provider cannot be identified to take the social rented or affordable rented properties (given that these would form a substantial part of the affordable mix).</p> |
| 018           | OPP207     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy H5    | <p>Broadly supportive of the policy and strongly support the increased targets for delivery of social housing. Note the extreme variation in the requirements for affordable housing between the LHNA carried out in 2019 and 2024 and question if there is an explanation for the variation? Given this substantial increase in the requirement for affordable homes in a five-year period, ask if the targets for affordable and social housing are sufficient for this to be addressed, particularly given the length of time covered by the Local Plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Respondent ID | Comment ID | Name              | Organisation                                                             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 022           | OPP269     | Matthew Broadbent | Save Royton's Green Belt                                                 | Policy H5    | Concerns about the effectiveness of the policy. In line with intentions of PfE to be a 'brownfield-first plan' the policy should be modified to incentivise brownfield development (to take the pressure off green spaces) which may still deliver more genuinely affordable housing in the long-term. In Table H4, consider reducing brownfield quotient in high value areas from "20% of site capacity" to "10% of site capacity", and in medium & low value areas from "10% of site capacity" to "0% of site capacity".                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 023           | OPP284     | Natasha Styles    | The Planning Bureau on behalf of McCarthy and Stone and Churchill Living | Policy H5    | Policy H4 states that 'Specialist housing provision of 10 homes and above are expected to provide affordable housing, in line with Local Plan Policy H5'. As there is no other detail within Policy H5, it is assumed that this requires specialist housing to deliver affordable housing in line with mainstream housing at the variable rate set out. The Oldham Local Plan Viability Assessment has not tested specialist housing for older people as a typology. Given that the one scheme tested with houses and flatted development (rather than just houses) within this Viability assessment has been found to not be viable, would advocate that that if specialist housing for older people were to be tested within this study, the typology would be found to be even less viable than the scheme tested with flatted development and with such an outcome the plan should then seek to exempt specialist housing for older people from affordable housing to ensure that such specialist schemes are delivered, especially given the large need for this typology and the requirements of the Viability PPG. The Council should note that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing. Specialist housing schemes for older people are different to mainstream housing and tend to be flatted developments based around communal facilities and community living and delivered on smaller sites. Older persons housing therefore differs from a standard model of development because, as confirmed within the PPG it generally has additional facilities such as extensive communal areas, such as space to socialise, a |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|               |            |      |              |              | <p>wellbeing centre as well as a care service with 24-hour access to support services and staff, meals are also often available. However, the facilities do take up floorspace and there are other additional costs which make the viability of such schemes much more challenging. This is all in addition to facilities provided in a mainstream flatted scheme and makes scheme even less viable. A briefing note on this subject is suggested for consideration. Once the older people's housing typology has been tested through the Viability Assessment and if it is found to be substantially unviable, requiring such sites to in effect, go through a Viability Assessment at the application stage is contrary to national policy and instead an exemption should be provided within Policy H5. Some suggested policy wording on this matter is provided. Given the large need or older persons housing identified in the plan/ evidence, the exemption to affordable housing for specialist housing should not need to be based on need for older persons housing, as this need is already well established.</p> <p>Recommend that point b of H5 is amended as follows: "b) that provide specialist housing to meet local housing needs."</p> |



| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 025           | OPP299     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy H5    | The map defining the value areas is very high level and it is challenging to determine precise boundaries at a sufficient level of detail. It would appear however that Beal Valley and Broadbent Moss allocations are both located within value areas where 10% of the site capacity should be delivered as affordable housing - support that level of provision. The principle of delivering affordable housing through new residential development is supported. The quantity of homes required to trigger affordable housing requirements at sites has decreased from 15 dwellings to 10 dwellings. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites and in accordance with national policy and guidance. Strategic allocations are expected to deliver a substantial number of homes over an extended period and could involve significant infrastructure investments. It is important that affordable housing requirements are therefore applied in a manner that takes account of site-specific viability considerations and the infrastructure requirements associated with large scale strategic developments. Support the policy and particularly welcomes the acknowledgement that affordable housing can be delivered by the use of planning conditions. |
| 026           | OPP321     | Cait O'Dowd | Ashton Hale on behalf of Saddleworth Property Partnership      | Policy H5    | The principle of delivering affordable housing through new residential development is supported. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites. Sites such as Saddleworth Business Centre represent a logical location for the delivery of affordable housing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Respondent ID | Comment ID | Name        | Organisation                                          | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| 028           | OPP331     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd | Policy H5    | The map defining the value areas is very high level and it is challenging to determine precise boundaries at a sufficient level of detail. It would appear however that Beal Valley is located within value areas where 10% of the site capacity should be delivered as affordable housing and support that level of provision. The principle of delivering affordable housing through new residential development is supported. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites and in accordance with national policy and guidance. Strategic allocations are expected to deliver a substantial number of homes over an extended period and could involve significant infrastructure investments. It is important that affordable housing requirements are therefore applied in a manner that takes account of site-specific viability considerations and the infrastructure requirements associated with large scale strategic developments. Support the policy and particularly welcomes the acknowledgement that affordable housing can be delivered by the use of planning conditions. |
| 029           | OPP340     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd | Policy H5    | The map defining the value areas is very high level and it is challenging to determine precise boundaries at a sufficient level of detail. It would appear however that the site is located within value areas where 10% of the site capacity should be delivered as affordable housing and GdeG would support that level of provision. The principle of delivering affordable housing through new residential development is supported. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites and in accordance with national policy and guidance. GdeG therefore supports the policy and particularly welcomes the acknowledgement that affordable housing can be delivered by the use of planning conditions.                                                                                                                                                                                                                                                                                                                                                                                   |

| Respondent ID | Comment ID | Name           | Organisation                                                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 030           | OPP352     | Cait O'Dowd    | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Policy H5    | The principle of delivering affordable housing through new residential development is supported. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites. Sites such as Bee Mill represent a logical location for the delivery of affordable housing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 031           | OPP362     | Cait O'Dowd    | Ashton Hale on behalf of Prestigious Homes North West                                     | Policy H5    | The principle of delivering affordable housing through new residential development is supported. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites. Sites such as Birks Quarry and land north of Waterworks Road represent a logical location for the delivery of affordable housing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 032           | OPP373     | Cait O'Dowd    | Ashton Hale on behalf of Andy Hulme                                                       | Policy H5    | The principle of delivering affordable housing through new residential development is supported. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites. Sites such as land off Standedge Road represent a logical location for the delivery of affordable housing, which the landowner is committed to providing within any future residential planning application at the site.                                                                                                                                                                                                                                                                                                                                                                                           |
| 033           | OPP384     | Michael Parham | Taylor Wimpey                                                                             | Policy H5    | The requirement is not based on robust and appropriate evidence and is not justified. The Local Housing Needs Assessment (2024) identifies an affordable housing need of 669 per year which is just short of the overall housing requirement stated in Policy H1 of the Local Plan (680). The evidence base for the policy therefore indicates that the number of affordable homes expected to be delivered in the Local Plan are capped due to the viability constraints of the borough (permitted under paragraph 34 of the NPPF). The Housing Needs of Different Groups PPG outlines that an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes. This supports the view that the housing need outlined in Policy H1 should be reconsidered. In |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|               |            |      |              |              | addition, the Viability Assessment for the Local Plan sets out the viability challenges for Medium and Lower Value areas, therefore the evidence base does not justify the 10% affordable housing requirement in Medium and Lower Value Areas. In High Value areas, developments over 100 dwellings are also considered to be unviable on both greenfield and brownfield land, indicating that the policy requirement for High Value areas is unjustified. Policy H5 does not set out an option for applicants to negotiate affordable housing requirements in situations where it is unviable to provide the affordable housing requirements set out in the Policy, even though the Viability Assessment highlights some scenarios are unviable. The policy also provides limited flexibility to take site-specific circumstances into account, which is likely to stifle the delivery of homes in Oldham and render the policy ineffective. |

**Table H6: Responses submitted on Policy H6 Houses in Multiple Occupation**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 018           | OPP208     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy H6    | Note that there is a reference to the different housing markets for HMOs but no analysis of how this breaks down in Oldham. Ask whether this needs to be included, and whether the policy would then need to be amended to reflect the development of HMOs to serve specific markets. Also note that there are multiple definitions of HMOs, and that while the definition being used is given in the reasoned justification and think the definition should be included in the policy itself. Licence is spelled incorrectly (as a verb, not a noun). |

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| 022 | OPP270 | Matthew Broadbent | Save Royton's Green Belt | Policy H6 | <p>Applicants should be required to evidence criterion 2 and this should be confirmed by the Council before approving. Suggested amendment to criterion 2 as follows:</p> <p><u>"2. It can be clearly evidenced it does not result in an undue concentration of HMO provision in any particular area of the borough."</u></p> <p>Being able to build a relationship with a neighbour is an important aspect of residential amenity, and being sandwiched by HMOs potentially jeopardises. As such criterion 3 needs to be expanded to prevent this – suggest wording is replaced as follows:</p> <p><u>"3. Ensures:</u></p> <p><u>a) that no two adjacent properties apart from those that are separated by a road are converted to HMOs, and</u></p> <p><u>b) that a residential property is not sandwiched by two HMOs;"</u></p> <p>A further criterion is required regarding housing mix so that Policy H6 does not undermine Policy H3, as follows: <u>"5. The HMO use contributes to the unacceptable loss of accommodation in a locality, in terms of mix, size and type;"</u></p> |
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**Table H7: Responses submitted on Policy H7 Gypsies, Travellers and Travelling Showpeople**

| Respondent ID | Comment ID | Name         | Organisation     | Policy/Topic | Summary of Comments |
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| 011           | OPP97      | Emily Hycran | Historic England | Policy H7    | Support             |

## 8. Responses submitted on the Economy and Employment Policies

**Table E1: Responses submitted on Policy E1 Employment and Floorspace Requirements**

The table below also includes general comments submitted regarding the economic policies.

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic  | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 011           | OPP98      | Emily Hycran        | Historic England           | Paragraph 9.6 | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 018           | OPP209     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Chapter       | Broadly supportive of the policies to enhance the economy and employment throughout this chapter but concerned at the lack of references in this section to farmland and agriculture, which is a major part of the economy of Saddleworth, and in certain other parts of the borough. There should either be a specific policy on farming and agriculture or one of the existing policies should be amended to include extensive reference to farming and agriculture. Also, no reference to home working (other than separately in Policy IN 1) so one of the policies in this chapter should be amended to reference home working. |
| 018           | OPP210     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy E1     | The policy says that there “will be” the delivery of a specific amount of floorspace”. Suggest that the policy would be better worded as “should be” or similarly amended to reflect this as a target, not a guarantee, as otherwise this could lead to unforeseen conflicts between planning policies, particularly towards the end of the period.                                                                                                                                                                                                                                                                                  |
| 022           | OPP271     | Matthew Broadbent   | Save Royton’s Green Belt   | Policy E1     | The policy as it stands, invokes an unnecessary mathematical calculation and conflates two distinct concepts i.e. that of gross need that should be delivered, and that of land provision which also includes flexibility in the supply. Request policy wording replaced with:<br><u>“To contribute towards achieving the overall employment floorspace requirements set out in PfE policies JP-J3 and JP-J4, ensure the following:</u>                                                                                                                                                                                              |

| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|               |            |             |                                                                |              | <u>(a) there is sufficient land supply for 79,200 sqm of office (E(g)(i)) floorspace, and deliver at least 61,200 sqm.</u><br><u>(b) there is sufficient land supply for 222,200 sqm of industrial and warehousing (B2 and B8) floorspace, and deliver at least 171,700 sqm."</u>                                                                                                                                                                                                                                                                                                                                                              |
| 025           | OPP300     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy E1    | <p>It is important that the Local Plan supports the delivery of the employment growth objectives and spatial strategy established through PfE and ensures that its policies facilitate the delivery of development within strategic allocations identified within PfE. It is also important that the floorspace targets set out within Policy E1 are recognised as minimum requirements over the Plan period. The Broadbent Moss allocation identified through PfE is expected to deliver approximately 21,000sqm of industrial and warehousing floorspace and will form an important component of Oldham's future employment land supply.</p> |

| Respondent ID | Comment ID | Name        | Organisation                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 026           | OPP317     | Cait O'Dowd | Ashton Hale on behalf of Saddleworth Property Partnership | Policy E1    | The Publication Plan explains that its figures are derived from a methodology previously advanced by the PfE authorities during the Main Modifications stage of the PfE examination however, the Inspectors concluded that such modifications were not necessary to ensure the soundness of the joint plan, as national policy does not require the apportionment of employment land requirements at the district level. As a result, the approach taken in the Publication Plan is not aligned with PfE and does not appear to be based on a consistently applied or clearly justified evidence base. The discrepancy between the PfE figures and those in the Regulation 19 Plan further undermines the robustness of the identified requirements. Furthermore, even if the Plan were to rely on the PfE figures, these represent a supply position as at April 2022 and include a combination of saved Unitary Development Plan allocations, sites with extant planning permission, and allocations identified within PfE. As such, they do not provide an up to date or policy led assessment of future employment land needs, and their continued reliance raises concerns regarding the Plan's evidential accuracy and consistency. The figures included within the Publication Plan have been inflated and do not reflect those within the Draft Employment Land Review used to inform the Draft Local Plan. It is therefore considered that the Council are claiming an over-supply of need for employment land provisions in the borough. |



| Respondent ID | Comment ID | Name        | Organisation                                                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 030           | OPP348     | Cait O'Dowd | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Policy E1    | The Publication Plan explains that its figures are derived from a methodology previously advanced by the PfE authorities during the Main Modifications stage of the PfE examination however, the Inspectors concluded that such modifications were not necessary to ensure the soundness of the joint plan, as national policy does not require the apportionment of employment land requirements at the district level. As a result, the approach taken in the Publication Plan is not aligned with PfE and does not appear to be based on a consistently applied or clearly justified evidence base. The discrepancy between the PfE figures and those in the Regulation 19 Plan further undermines the robustness of the identified requirements. Furthermore, even if the Plan were to rely on the PfE figures, these represent a supply position as at April 2022 and include a combination of saved Unitary Development Plan allocations, sites with extant planning permission, and allocations identified within PfE. As such, they do not provide an up to date or policy led assessment of future employment land needs, and their continued reliance raises concerns regarding the Plan's evidential accuracy and consistency. The figures included within the Publication Plan have been inflated and do not reflect those within the Draft Employment Land Review used to inform the Draft Local Plan. It is therefore considered that the Council are claiming an over-supply of need for employment land provisions in the borough. |

| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 042           | OPP402     | Michael Parham | Lichfields on behalf of Russell LDP | Policy E1    | Draft Policy E1 highlights that the floorspace requirements will be provided in Oldham over the period of 2022-2039. The Inspectors' Examination Report on the PfE Publication Plan states the following with regard to the role of PfE and their relationship with Local Plans. Local Plans are expected to allocate sites for industrial, warehouse and office developments, in addition to the employment allocations in the Plan, which look ahead a minimum period from their adoption date. This is compounded in PfE paragraph 1.56. Paragraph 2.20 of the Publication Plan Economy and Employment Topic Paper incorrectly states that Policies JP-J3 and JP-J4 outline the office, industry and warehousing floorspace required over the period 2022-2039. In accordance with the Inspector's comments and paragraph 22 of the NPPF strategic policies are expected to look ahead a minimum period of 15 years from their adoption. As such, in line with anticipated adoption set out in Oldham's LDS of Spring 2027, the employment floorspace requirements set out under draft Policy E1 should include employment land provision up to 2042. By extending the plan period Oldham will need to identify additional supply of employment land to deliver its development needs for employment space up to 2042. With the above in mind, it is critically important that PfE allocations, such as the extension to Stakehill Industrial Estate under Policy JPA2, within Oldham are supported and come forward within the plan period so that the need to identify additional land, over and extended plan period, is not exacerbated further. |

**Table E2: Responses submitted on Policy E2 Business and Employment Areas**

| Respondent ID | Comment ID | Name            | Organisation                                                            | Policy/Topic     | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 007           | OPP68      | Andrew Leyssens | United Utilities                                                        | Policy E2        | Request that policy qualifies that there may be site-specific issues which need to be addressed in the determination process when considering development in Business and Employment Areas. Request that the wording that precedes the 9 numbered points at the end of the Policy is amended to state: "The uses that will be permitted within our BEAs, <u>subject to any site-specific issues</u> , are:"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 010           | OPP90      | Angela Brooks   | Fisher German LLP - on behalf of National Grid Electricity Transmission | Policy E2 - BEA3 | Object to the policy as currently drafted. BEA 3 is crossed by or in close proximity to NGET assets (plan provided). The Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured. Whilst it is acknowledged that the employment site is already developed, the thrust of the policy is clearly to encourage existing firms to expand and, as such, an intensification of the proposed allocation's existing employment use. NGET consider that the following wording, or wording to similar effect, should be included, which recognises the presence of assets which would need addressing as part of any new proposals: " <u>New development will include a strategy for responding to the NGET assets present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.</u> " |

| Respondent ID | Comment ID | Name                | Organisation                                                            | Policy/Topic      | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 018           | OPP211     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                              | Policy E2         | Strongly supportive of this policy and particularly note the importance of retaining BEAs in a high property value area. With reference to the uses permitted in the BEAs, ask if all of those permitted uses are supported in all cases, or whether there should be a reference made to the neighbourhood context of the BEA. Also question whether health facilities such as such as gyms would qualify under the uses laid out, and if full consideration has been given to whether they should be.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 026           | OPP314     | Cait O'Dowd         | Ashton Hale on behalf of Saddleworth Property Partnership               | Policy E2 - BEA21 | Objects to the continued designation of Saddleworth Business Centre as part of BEA21 (Valley Mills) within the Local Plan. The site is no longer suitable, viable or appropriate for employment use, and its retention for such purposes is not justified by the evidence base, nor consistent with national policy. The site is constrained in operational terms, most notably by access arrangements which are unsuitable for modern commercial or industrial uses (HGV movements). In addition, the site is now isolated from the wider employment area and instead sits within an established residential context. Continued employment use gives rise to amenity conflicts and does not represent an effective or sustainable use of land. The continued allocation of SBC for employment use is not deliverable in practice. There is no realistic prospect of the site contributing meaningfully to the borough's employment land supply and it is better suited to residential development. The failure to recognise this opportunity reduces the effectiveness of the Plan in delivering housing. Modification requested:<br>"There are <del>23</del> <u>22</u> BEAs designated across the borough. These are identified on the Policies Map and set out in Table E1 below."<br>[Removal of BEA 21 Valley Mills from Table E1]... |
| 030           | OPP345     | Cait O'Dowd         | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley | Policy E2 - BEA8  | Support the ongoing operation of existing businesses at Bee Mill and recognise the site's role in supporting local employment however, consider it important that the Local Plan provides flexibility to respond to future circumstances. As such, object to the continued designation of the Site as part of BEA8 (Shaw Road) and instead                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Respondent ID | Comment ID | Name | Organisation      | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|               |            |      | and Alan Rothwell |              | <p>believe that Bee Mill represents a suitable and sustainable location for residential development in the future, should the site become available through relocation, business restructuring, or other unforeseen changes. The designation of Bee Mill is not justified when considered against reasonable alternatives. The site is no longer suitable for employment use, particularly when assessed against Policy E3 criteria. The Council has not adequately demonstrated why the retention of Bee Mill for employment use is the most appropriate strategy when compared to the clear and deliverable alternative of residential redevelopment. The continued allocation of Bee Mill for employment use is not deliverable in practice. The site is constrained, underperforming, and not capable of meeting modern employment requirements. There is no realistic prospect of the site contributing meaningfully to the borough's employment land supply. The site however, is immediately available and suitable for residential redevelopment, with a clear prospect of delivery in the short to medium term. The failure to recognise this opportunity reduces the effectiveness of the Plan in delivering housing. The continued allocation of Bee Mill for employment use conflicts with principles of the NPPF in that, the Plan does not promote the effective use of land and the provision of sustainable housing within this location. Modification requested:</p> <p>"There are <del>23</del> <u>22</u> BEAs designated across the borough. These are identified on the Policies Map and set out in Table E1 below."</p> <p>[Removal of BEA 8 Shaw Road from Table E1]...</p> |

| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------|----------------|-------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 042           | OPP403     | Michael Parham | Lichfields on behalf of Russell LDP | Policy E2    | <p>Oldham has a total industrial and warehousing land supply of 287,922 sqm over the 2022-2039 period. Nearly half of this is made up from PfE allocations (136,720 sqm). Therefore, it is clear that the Stakehill Industrial Estate extension will make a very significant contribution to Oldham's overall industrial and warehousing needs up to 2039. However, despite this, the draft Oldham Local Plan only makes limited references to JPA2 and its important contribution to meeting Oldham's future employment needs. Policy E2 could specifically refer to the PfE allocations including Stakehill Industrial Estate extension site. Table E1 of draft Policy E2 should also be updated to specifically refer to and include the Stakehill Industrial Estate extension, as this will be critical to the delivery of Oldham's employment needs over the period of the plan. Direct policy support for the allocation and development of the Stakehill extension through Local Plan policies will provide additional certainty for applicants and decision makers alike. This will help to ensure the delivery of the Stakehill Industrial Estate extension, and the delivery of the employment floorspace requirements set out in draft Policy E1. As with the consideration of draft Policy E1, there is concern that there is insufficient employment land to cover Oldham's needs for the requisite plan period, which put the soundness of the plan to question. The plan period should cover a 15-year period from 2027. The policy should be amended to refer to the Stakehill Allocation JPA2 allocation as meeting part of Oldham's future needs.</p> |

**Table E3: Responses submitted on Policy E3 Exceptions within Business and Employment Areas**

| Respondent ID | Comment ID | Name         | Organisation     | Policy/Topic | Summary of Comments |
|---------------|------------|--------------|------------------|--------------|---------------------|
| 011           | OPP99      | Emily Hycran | Historic England | Policy E3    | Support.            |

**Table E4: Responses submitted on Policy E4 Employment Sites outside of Business and Employment Areas**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic               | Summary of Comments                                            |
|---------------|------------|---------------------|----------------------------|----------------------------|----------------------------------------------------------------|
| 011           | OPP100     | Emily Hycran        | Historic England           | Policy E4                  | Support.                                                       |
| 018           | OPP212     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy E2 - paragraph 9.28 | Should read as significant 'number' of clusters, not 'amount'. |

**Table E5: Responses submitted on Policy E5 Reuse and redevelopment of Mill Buildings**

| Respondent ID | Comment ID | Name         | Organisation        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                    |
|---------------|------------|--------------|---------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 003           | OPP34      | Simon Tucker | Canal & River Trust | Policy E5    | Several mills' buildings are in close proximity to the canal waterway networks and contribute to the wider heritage value of the canal settings. More flexible uses for empty mill sites are welcomed supported, it is not clear on the amount of evidence required for a viability exercise and further detail on the expectations could be provided. |
| 011           | OPP101     | Emily Hycran | Historic England    | Policy E5    | Support.                                                                                                                                                                                                                                                                                                                                               |

## 9. Responses submitted on the Our Centres Policies

**Table C1: Responses submitted on Policy C1 Our Centres**

The table below also includes general comments submitted regarding Oldham's Centres.

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|------------|---------------------|----------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP213     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Chapter      | Supportive of many of the elements in this chapter but feel there is a failure to address rural centres and the requirements of people living in rural environments, and that this needs to be addressed better throughout the document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 018           | OPP214     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy C1    | Many of the villages across Saddleworth have centres offering services which would not fit easily within the term "Local Shopping Parades" which is also not clearly defined within the document. Ask if a better term might be "Local Service Clusters" or similar and ask for more in the policy reasoned justification to define these, perhaps around density of services facilities in a given area. Also note that there are villages which have already lost what shops they once had, for example Denshaw, but where people still require local services, and these locations are not captured in this policy. Suggest that there should be a reference in the policy to places where there is sufficient housing density to justify the provision of services, but they are not currently present. |

**Table C2: Responses submitted on Policy C2 Protecting the vitality of our centres**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                  |
|---------------|------------|---------------------|----------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP215     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy C2    | Echo the concerns about the use of the term Local Shopping Parades as set out against Policy C1, feel that by changing this reference, the policy would better reflect the needs of and approaches to rural centres. |



| Respondent ID | Comment ID | Name          | Organisation         | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|------------|---------------|----------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 021           | OPP266     | Matthew Sobic | Brookhouse Group Ltd | Policy C2    | <p>Maintain representation made in the letters of 26 August 2021 and 23 February 2024 that the impact assessment thresholds in the emerging Local Plan (Policy C2) are not appropriate. The wording of the policy is drafted in a way that any proposal exceeding 300 sq. m 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 policy evidence base, namely the Oldham Retail &amp; Leisure Study, published in September 2020. Therefore, if the Council were to 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 as presently, a proposal for example in Chadderton would still be required to assess the impacts of a proposal on Shaw.</p> <p>Importantly, we consider that 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 reduced threshold for assessing impact should only be introduced where there is detailed and compelling evidence to show that proposals for main town centre uses less than 2,500 sqm in out of centre locations would have the potential to cause a significant adverse impact on a centre or centres in the hierarchy. The Retail &amp; Leisure Study does not provide evidence to support the lowering of the threshold. A blanket reduction in the threshold to 1,500 sqm for proposals close to Oldham town centre, which is below the national threshold of 2,500 sqm would serve no purpose other than to add barriers to the delivery of physical retail development that is appropriate within the Oldham area.</p> <p>In terms of District Centres, a reduction to 300 sqm is not justified. District style centres are performing well and are anchored by convenience and community retail formats that are resilient to economic cycles and serve the communities within which they are</p> |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------|------------|------|--------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |      |              |              | situated well. Reducing the threshold for requiring an impact assessment does not in itself mean that planning applications for main town centre uses will be refused on grounds of significant adverse impact. It merely introduces a requirement for more applications to be assessed. The purpose of the impact test is to determine whether a proposed development for main town centres use(s) would likely have a significant adverse impact upon the vitality and viability of the town centre as a whole. It is not to prevent any out of centre retail development from occurring. Adding an additional requirement to the planning process where there is no justification, only serves to add a layer of analysis that has the potential to cause delays to the delivery of sustainable development when it is not required to support an objective to support physical retail delivery. It follows from the above that the question being considered by the Council in proposing a reduced threshold for assessing impact is; whether a proposed development of less than the national impact threshold and located outside of a defined centre could have the potential to cause a significant adverse impact on the vitality and viability of the centre as a whole. There is no evidence provided in the Retail & Leisure Study, quantitative or qualitative, which indicates that such harm could be reasonably expected to occur. |

**Table C3: Responses submitted on Policy C3 Changes of use and redevelopment within the borough's centres**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                 |
|---------------|------------|---------------------|----------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP216     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy C3    | Note that in points 6a, b, c, d and f there is no clear definition of any measurements by which these points would be assessed and that in planning terms this could render them ineffective. Suggest that there should be a clear indication in the policy reasoned justification of how these would be defined and considered in the context of a |

|  |  |  |  |  |                                                                              |
|--|--|--|--|--|------------------------------------------------------------------------------|
|  |  |  |  |  | planning application, for the benefit of planners, residents and developers. |
|--|--|--|--|--|------------------------------------------------------------------------------|

**Table C4: Responses submitted on Policy C4 Local Services and Facilities**

| Respondent ID | Comment ID | Name                | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------|------------|---------------------|----------------------------------------------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP217     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                     | Policy C4    | Reiterate comments made against Policy C1 with reference to Local Shopping Parades with regards to how this policy is applied in rural centres but are strongly supportive of the principle. However, note that the monitoring approach suggested in paragraphs 10.31 and 10.32 is very broad, and takes no account of the differences between urban and rural centres. Suggest these paragraphs be revised to add significant details to the monitoring criteria, and how they will be applied in different contexts. |
| 025           | OPP301     | Cait O'Dowd         | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy C4    | Support the Council's recognition of the role of local centres and, through their draft Spatial Principles SPD, has placed strong emphasis on delivering new community amenities. They are committed to delivering a local centre that will include a range of facilities. This community 'hub' will serve both new and existing residents. The guiding principle is to ensure the hub sits at the heart of the new neighbourhood and is within a 15–20-minute walk for all homes across the two sites.                |

## 10. Responses submitted on the Oldham Town Centre Policies

**Table OTC1: Responses submitted on Policy OTC1 Oldham Town Centre**

| Respondent ID | Comment ID | Name            | Organisation     | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------|------------|-----------------|------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP69      | Andrew Leyssens | United Utilities | Policy OTC1 paragraph 11.11 | Will undertake a high-level review of the sites outlined in paragraph 11.11 and provide any comments / concerns for inclusion within evidence base.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 008           | OPP88      | Stuart Beesley  | Individual       | Policy OTC1                 | Comments are focussed on Oldham Town Centre and the Civic Centre buildings. Comments explain that the buildings in the civic centre site are landmarks, help with wayfinding and are culturally significant and explains the reasons why. States that it would be a huge loss for the town if they were to be demolished and replaced by housing. Discusses the environmental impact of demolishing the buildings and constructing new buildings. States that their retention and reuse would be the most sustainable way forward for these buildings. States that their demolition does not fit with “sustainability and reuse”. Reuse and adaptation must be the only credible way forward, not demolition. Would like a modification that finds a sustainable solution for saving the Civic Centre buildings. |
| 011           | OPP102     | Emily Hycran    | Historic England | Policy OTC1                 | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 038           | OPP397     | Tom Clarke      | Theatres Trust   | Policy OTC1                 | Welcome and support promotion of additional facilities for cultural and live performance venues to complement the Coliseum Theatre. These help generate additional footfall and vibrancy, supporting the social and cultural well-being of local people as well enhancing the success of the town centre in line with the policy's objective.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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

| Respondent ID | Comment ID | Name         | Organisation     | Policy/Topic | Summary of Comments |
|---------------|------------|--------------|------------------|--------------|---------------------|
| 011           | OPP103     | Emily Hycran | Historic England | Policy OTC2  | Support             |

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

| Respondent ID | Comment ID | Name            | Organisation     | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                  |
|---------------|------------|-----------------|------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP70      | Andrew Leyssens | United Utilities | Policy OTC3  | Request that the following wording is added to the numbered list within this Policy: <u>"7. integrating the strategy for the management of surface water with the design of the public realm at the start of the design process to ensure that space is made for the SuDS."</u> Some suggested text for the Reasoned justification is also included. |
| 011           | OPP104     | Emily Hycran    | Historic England | Policy OTC3  | Support.                                                                                                                                                                                                                                                                                                                                             |

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

| Respondent ID | Comment ID | Name          | Organisation              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|------------|---------------|---------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP9       | Martyn Walker | Lancashire Wildlife Trust | Policy OTC4  | Welcome and support policy. Pleased that the protection, creation and enhancement of multi-functional Green Infrastructure within and around Oldham Town Centre will be expected. Welcome that development will need to have regard to the nature network within the Local Nature Recovery Strategy and incorporate biodiversity enhancements. Agree with and welcome that nature-based solutions and sustainable drainage systems will be integrated as part of the multi-functional green infrastructure provision. |

| Respondent ID | Comment ID | Name            | Organisation                                                                              | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                        |
|---------------|------------|-----------------|-------------------------------------------------------------------------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP71      | Andrew Leyssens | United Utilities                                                                          | Policy OTC4 paragraph 11.30 | Supportive of point 6. Request a minor amendment to Paragraph 11.30 as follows: "Green infrastructure needs to be multi-functional, not only providing biodiversity benefits but also providing nature-based solutions, such as to manage surface water flood risk <u>and slow the flow of surface water</u> in the form of sustainable drainage systems." |
| 025           | OPP302     | Cait O'Dowd     | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium                            | Policy OTC4                 | Support this policy, recognising the significant benefits which Green Infrastructure can provide to human health.                                                                                                                                                                                                                                          |
| 026           | OPP323     | Cait O'Dowd     | Ashton Hale on behalf of Saddleworth Property Partnership                                 | Policy OTC4                 | Fully support the Council's proposals to increase green links and provide enhanced biodiversity provisions within new developments.                                                                                                                                                                                                                        |
| 030           | OPP353     | Cait O'Dowd     | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Policy OTC4                 | Support the Council's proposals to increase green links and provide enhanced biodiversity provisions within new developments.                                                                                                                                                                                                                              |
| 031           | OPP364     | Cait O'Dowd     | Ashton Hale on behalf of Prestigious Homes North West                                     | Policy OTC4                 | Support the Council's proposals to increase green links and provide enhanced biodiversity provisions within new developments.                                                                                                                                                                                                                              |
| 032           | OPP375     | Cait O'Dowd     | Ashton Hale on behalf of Andy Hulme                                                       | Policy OTC4                 | Support the Council's proposals to increase green links and provide enhanced biodiversity provisions within new development.                                                                                                                                                                                                                               |

## 11. Responses submitted on the Addressing Climate Change Policies

**Table CC1: Responses submitted on Policy CC1 Renewable and Low Carbon Energy**

The table below also includes general comments submitted in regard to climate change adaptation.

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic             | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|------------|---------------------|----------------------------|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP10      | Martyn Walker       | Lancashire Wildlife Trust  | Paragraphs 12.4 and 12.5 | Welcome Oldham's aim to become the greenest borough and its ambition to be the UK's first Green New Deal Council. Support and welcome Oldham's objective of establishing the borough as an exemplar Green City.                                                                                                                                                                                                                                                                |
| 002           | OPP11      | Martyn Walker       | Lancashire Wildlife Trust  | Paragraph 12.6           | Agree with and support the council in seeing nature as playing an important role in providing key services for climate change adaption and support its commitment to restoring natural processes and utilising nature-based solutions to help communities become more resilient to climate change, whilst enhancing nature and biodiversity.                                                                                                                                   |
| 003           | OPP35      | Simon Tucker        | Canal & River Trust        | Paragraph 12.10 and 12.5 | Expansion on the paragraph 12.10 to include the mention of water resources as a low carbon energy source is recommended and mentioning examples of this such as water source heat pumps and active cooling solutions would be beneficial as they are more efficient than air source alternatives.                                                                                                                                                                              |
| 018           | OPP218     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Chapter                  | Strong support for the approaches taken in this chapter and note the strong conformity of the Saddleworth Neighbourhood Plan. Some very minor additions or corrections to some of the policies suggested.                                                                                                                                                                                                                                                                      |
| 037           | OPP394     | Steve Stayce        | Environment Agency         | Paragraph 12.1           | NPPF requires that flood risk is managed and, where possible, reduced. Recommend that paragraph 12.1 is updated to reflect this with the proposed modification as follows: "The Local Plan needs to help reduce greenhouse gas emissions; mitigate <u>and, where possible, reduce</u> storm and flood risks, reduce overheating and water scarcity, minimise vulnerability and improve resilience, and support renewable and low carbon energy and associated infrastructure." |



| Respondent ID | Comment ID | Name                | Organisation                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------|------------|---------------------|--------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP12      | Martyn Walker       | Lancashire Wildlife Trust      | Policy CC1   | Welcomes that before being supported development would need to appropriately assess biodiversity issues and the presence of peat soils. Agree with and welcome the recognition that peat plays an important role in nature-based solutions such as carbon storage and biodiversity support. Agree that it is important to protect peat where the condition allows it to perform important functions. There should be a presumption against development on deep restorable peat that either reduces the area of peat, the condition of the peat or impacts its ability to be rewetted and restored. |
| 007           | OPP72      | Andrew Leyssens     | United Utilities               | Policy CC1   | Request the following minor amendment to this policy: “9. Flood Risk, hydrology, <u>water quality</u> , and the <u>impact on water supply resources</u> , and water catchment land;”<br>Supportive of associated paragraph 12.21. It is essential that the impact of proposals such as windfarms are assessed and mitigated to ensure no impact on public water supply, which is an essential service that must be protected.                                                                                                                                                                      |
| 011           | OPP105     | Emily Hycran        | Historic England               | Policy CC1   | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 015           | OPP150     | Natalie Belford     | Manchester Airport Group (MAG) | Policy CC1   | Welcome the amendments that have been made to the policy since comments were submitted on the Draft Local Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 018           | OPP219     | Cllr Sam Al-Hamdani | Saddleworth Parish Council     | Policy CC1   | Note that in the Saddleworth Neighbourhood Plan, under policy 5, character and quality of land adjacent to the National Park, and a defined area which is being considered in this policy, which is complementary to parts of this policy, and would suggest that this would be well reflected by adding a footnote reflecting this to point 13. There is a typo in the name “South Pennines” on page 86.                                                                                                                                                                                          |

| Respondent ID | Comment ID | Name              | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|------------|-------------------|----------------------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 022           | OPP272     | Matthew Broadbent | Save Royton's Green Belt                                       | Policy CC1   | Concern is that renewable energy infrastructure in the Green Belt may be treated as permitted development, rather than something that must be evidenced and justified. Very special circumstances need to be evidenced (not just demonstrated) and where technical claims are advanced as part of the reasoning for building renewable energy infrastructure in the Green Belt, it is crucial that such claims are clearly evidenced. The accompanying justification for Policy CC1 appears to establish the expectation that the Local Plan will support Oldham's Local Area Energy Plan which, in turn, identifies huge tracts of Green Belt as potential sites for renewable energy infrastructure such as solar farms. However, this document does not provide any form or evidencing and justification for building this infrastructure in the Green Belt. National policy does not identify renewable energy infrastructure in the Green Belt as permitted development, so it is necessary to embed in the Local Plan the requirement that building such infrastructure needs to be fully evidenced and justified. Modification proposed to criterion 6: "The openness of the Green Belt and whether very special circumstances have been demonstrated to justify otherwise inappropriate development, <u>and any technical reasons that are advanced as part of the reasoning for building in the Green Belt must have been clearly evidenced;</u> " |
| 025           | OPP305     | Cait O'Dowd       | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy CC1   | Agree with the policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 028           | OPP332     | Cait O'Dowd       | Ashton Hale on behalf of Grasscroft de Greenfield Ltd          | Policy CC1   | In line with Policy CC1, proposals for renewable and low-carbon energy development will be supported provided they do not cause adverse effects on the surrounding environment or harm local amenity. Agree with this view.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Respondent ID | Comment ID | Name         | Organisation                                          | Policy/Topic    | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------|--------------|-------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 029           | OPP341     | Cait O'Dowd  | Ashton Hale on behalf of Grasscroft de Greenfield Ltd | Policy CC1      | In line with Policy CC1, proposals for renewable and low-carbon energy development will be supported provided they do not cause adverse effects on the surrounding environment or harm local amenity. Agree with this view.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 037           | OPP395     | Steve Stayce | Environment Agency                                    | Paragraph 12.12 | Hydropower schemes offer a sustainable source of clean energy, but their location and design can sometimes conflict with Water Framework Directive requirements if not fully assessed. Recommend that paragraph 12.12 be expanded to indicate that an assessment for compliance with the Water Framework Directive may also be required. Suggested modification: "Planning applications for hydropower should normally be accompanied by a Flood Risk Assessment. <del>Early engagement with the Council and the Environment Agency will be necessary to identify any potential planning issues which are likely to be specific to the location. The Environment Agency has published advice on environmental protection for new hydropower schemes, and may also require an</del> <u>assessment to demonstrate the planning application is within compliance with the water framework directive.</u> " |

**Table CC2: Responses submitted on Policy CC2 Managing Flood Risk**

| Respondent ID | Comment ID | Name            | Organisation              | Policy/Topic    | Summary of Comments                                                                                                                                                                                                                                                                                                                 |
|---------------|------------|-----------------|---------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP13      | Martyn Walker   | Lancashire Wildlife Trust | Policy CC2      | Welcome and support policy.                                                                                                                                                                                                                                                                                                         |
| 003           | OPP36      | Simon Tucker    | Canal & River Trust       | Paragraph 12.34 | Welcome the reference to assessing residual risk of flooding from the canal network.                                                                                                                                                                                                                                                |
| 007           | OPP73      | Andrew Leyssens | United Utilities          | Policy CC2      | Supportive of this policy in particular the associated text in Paragraph 12.37 of the reasoned justification which outlines the need to engage with the wastewater undertaker to consider sewer and reservoir flood risk. It is important that the SFRA is regularly updated with evidence relating to these sources of flood risk, |

| Respondent ID | Comment ID | Name                | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|------------|---------------------|----------------------------------------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                     |                                                                |              | especially sewer flood risk. In addition, request that any flood risks that United Utilities identify in an initial high-level review of Oldham's land supply are reflected in an updated SFRA and in any supporting land supply data, for example, any land assessments for housing and employment land supply.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 018           | OPP220     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                     | Policy CC2   | Note that there is a lack of quality information on many locations of culverts, drains and sewers, etc, particularly in Saddleworth, and that this lack of information could be reflected in this policy or the reasoned justification. This section is a clear example of potential difficulties for people using the Local Plan and the Policy Map.                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 022           | OPP273     | Matthew Broadbent   | Save Royton's Green Belt                                       | Policy CC2   | The policy reiterates the requirements of national policy, rather than establishing the policy framework necessary to achieve this objective. The policy needs to be clear about the evidential thresholds that are necessary to conclude that the development will not increase flood risk elsewhere. Modification to criterion D proposed: <u>"The development will not increase flood risk elsewhere, taking into account the cumulative impacts of development within the wider catchment. This must be evidenced through an assessment of both the rate and timing of surface water discharge, including the potential for coincident peak flows and extended duration of runoff, and must show that the proposal does not exacerbate flood risk at sensitive receptors or known flooding locations."</u> |
| 025           | OPP304     | Cait O'Dowd         | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy CC2   | Policies CC2 and CC3 detail the Council's approach to development, and the associated impact to increased flood risk and associated drainage. The Consortium recognise that these two issues are instrumental to bringing forward sustainable development and that they should be managed appropriately across development sites to reduce risk. The principle of locating development in areas which are at lowest risk of flooding is supported, as is the need to prepare Flood Risk Assessments to support planning applications.                                                                                                                                                                                                                                                                          |

| Respondent ID | Comment ID | Name         | Organisation       | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                    |
|---------------|------------|--------------|--------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 037           | OPP396     | Steve Stayce | Environment Agency | Policy CC2   | Bullet point 1 should be amended to ensure a flood risk assessment is required where a site is in flood zone 3, not just 3a. Suggested modification as follows: "A site-specific Flood Risk Assessment (FRA) is required where a site is:<br>1. Within Flood Zone 3a or Flood Zone 2;" |

**Table CC3: Responses submitted on Policy CC3 Sustainable Drainage – Foul and Surface Water**

| Respondent ID | Comment ID | Name            | Organisation              | Policy/Topic    | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------|------------|-----------------|---------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP14      | Martyn Walker   | Lancashire Wildlife Trust | Policy CC3      | Welcome and support policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 003           | OPP37      | Simon Tucker    | Canal & River Trust       | Paragraph 12.41 | The detail in paragraph 12.41 would be more effective through highlighting this to prospective developers and decision makers when designing surface water drainage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 007           | OPP74      | Andrew Leyssens | United Utilities          | Policy CC3      | Highlight the updated requirements for sustainable drainage in the 2024 version of the NPPF, paragraph 182 and suggest amendments to the policy based on this, as follows: "Applications <del>for major development</del> <u>which could affect drainage on or around the site</u> will be supported by a sustainable drainage strategy and designed in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless there is clear evidence why such techniques are not possible. It should be integrated with the landscaped environment and the strategy for biodiversity net gain." |
| 007           | OPP75      | Andrew Leyssens | United Utilities          | Policy CC3      | In relation to watercourse maintenance, request the following amendment to this policy: "Applications are required to be accompanied by drainage management and maintenance plans, <del>having regard to</del> <u>including a management and maintenance plan for</u> any watercourse within the application site or an adjacent watercourse where the application site is afforded riparian rights."                                                                                                                                                                                                                                                      |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------|---------------------|----------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP76      | Andrew Leyssens     | United Utilities           | Policy CC3   | In regards to the final paragraph (paragraph 12.38) which states: '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.', whilst wholly recognising the importance of this issue, we also acknowledge the statutory position, i.e., there is a right to connect to the public sewer for both foul and surface water management and therefore any subsequent impact on the public sewer rests with the wastewater undertaker to manage in accordance with our statutory obligations and reflecting the infrastructure charges for connecting to the public sewer that we receive when development connects to our network. Every effort must be taken to apply the hierarchy for surface water management, ensure the implementation of SuDS and ensure a collaborative approach to the delivery of both drainage infrastructure (foul and surface water) on new development sites. |
| 018           | OPP221     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy CC3   | There is a typo – “Non-portable” should be “non-potable”, and the box outlining the policy seems to have slipped. Note the high level of conformity of policy 8 of the Saddleworth Neighbourhood Plan with this policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 022           | OPP274     | Matthew Broadbent   | Save Royton's Green Belt   | Policy CC3   | Suggest insertion of new paragraph in the policy between current paragraph's 5 and 6 as follows: <u>“In addition to controlling discharge rates, drainage strategies should consider the timing and duration of surface water runoff, and its interaction with receiving watercourses and drainage systems, to ensure that attenuated flows do not contribute to peak flood conditions or increased flood risk downstream, including when considered cumulatively.”</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Respondent ID | Comment ID | Name           | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------|----------------|----------------------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 025           | OPP306     | Cait O'Dowd    | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy CC3   | Support for the principles of the 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'. Understand the intention of this policy strand, however it should also be recognised that in larger allocations some strategies may not be site-wide due to reasons such as site topography, distance and other constraints or opportunities which provide merit in standalone strategies. It is suggested that the policy strand should be reworded to reflect this, adding flexibility.                                                                                                                                         |
| 042           | OPP404     | Michael Parham | Lichfields on behalf of Russell LDP                            | Policy CC3   | The policy largely duplicates existing national policy and guidance, including the requirements of the NPPF paragraph 181 and footnote 63, as well as the National Standards for SuDS PPG (updated July 2025). In doing so, the policy itself fails to introduce any locally specific requirements or evidence-based justification and is therefore not consistent with the expectation that Local Plan policies should present an appropriate strategy which is tailored to the circumstances of the local area. There is no clear evidence for repeating or restating such policy, and there has been no clear evidence presented which is tailored to the local area to justify the inclusion of the policy, which puts to question whether the policy is justified. |

**Table CC4: Responses submitted on Policy CC4 Water Efficiency**

| Respondent ID | Comment ID | Name            | Organisation     | Policy/Topic | Summary of Comments |
|---------------|------------|-----------------|------------------|--------------|---------------------|
| 007           | OPP77      | Andrew Leyssens | United Utilities | Policy CC4   | Support the policy. |

| Respondent ID | Comment ID | Name         | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------|------------|--------------|--------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 012           | OPP135     | Chris Martin | Home Builders Federation | Policy CC4   | <p>For residential development, Policy CC4 requires that all new developments are expected to achieve the optional requirement set through Part G of the Building Regulations. The optional water usage standard is 110 litres per person per day, in contrast, the building regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per person per day. This is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure.</p> <p>PPG is clear on evidence needed for Local Planning authorities to justify a move to the higher water standard. The Council indicates that evidence has been prepared by United Utilities and is summarised in its Addressing Climate Change Topic Paper. This acknowledges that Oldham does not fall in an area of water stress, although it points to a 2024 Water Resource Management Plan as evidence that moving to the optional standard is justified. Having reviewed the WRMP, this notes that there are notable leaks in the current network that need addressing. Furthermore, the region is envisaged to be a net exporter of water to other regions in the future, which should not be the case if the area is lacking in future water supply. Understand the objectives and desirability to move to a tighter water efficiency standard, it does not consider that the evidence submitted justifies this in line with the PPG.</p> |



| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------|------------|----------------|-------------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 042           | OPP405     | Michael Parham | Lichfields on behalf of Russell LDP | Policy CC4   | <p>The policy requirement for water efficiency is an 'optional' standard and has not been robustly justified in terms of its consistency with national policy in relation to need or viability. The evidence presented is in relation to residential development and there is no evidence provided which underpins the non-residential development policy position. The viability evidence prepared for the residential element of the Policy is in excess of 10 years old and not representative of water efficiency at the present time. The evidence provided is irrelevant for non-residential developments and as such it is impossible to determine the impact on the viability of schemes. Addressing Climate Change Topic Paper acknowledges that Oldham does not fall in an area of water stress, although it points to a 2024 Water Resource Management Plan (WRMP) as evidence that moving to the optional standard is justified. The WRMP identifies that the region is to be a net exporter of water to other regions in the future which should not be the case if the area is lacking in future water supply. Do not consider that the evidence submitted justifies the policy requirement for non-residential development and its implication on viability has not been taken into account. Support the objective of improving water efficiency of new development; however, the policy must provide greater flexibility to ensure applicants are not burdened with onerous policy requirements.</p> |

**Table CC5: Responses submitted on Policy CC5 Groundwater Source Protection Zones**

| Respondent ID | Comment ID | Name              | Organisation              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------|------------|-------------------|---------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP15      | Martyn Walker     | Lancashire Wildlife Trust | Policy CC5   | Welcome and support policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 007           | OPP78      | Andrew Leyssens   | United Utilities          | Policy CC5   | Welcome the policy, however request that the requirement for a management plan should address both construction and the operational life of any development. Suggest the following amendment: “3. <del>Construction</del> Management Plan – a <del>Construction</del> Management Plan will be required to identify the potential impacts from all construction activities <u>and from any activities during the operational life of the development</u> on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.”                                                                                                                              |
| 022           | OPP275     | Matthew Broadbent | Save Royton's Green Belt  | Policy CC5   | To ensure the policy operates effectively in protecting groundwater and public water supply, it is recommended that criterion 1 be amended to explicitly require consideration of off-site sources and dynamic pathways. Modification proposed as follows: “1. Risk Assessment - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection <del>will be required to manage the risk of pollution to public water supply and the water environment;</del> <u>including identification of on-site and off-site sources of contamination, an assessment of potential pathways (including those that may be altered or created by the development), and the potential impacts on groundwater receptors;</u> ” |

## 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**

The table below also includes general comments submitted in regard to the natural environment.

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|------------|---------------------|----------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP222     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Chapter      | Strong support of the policies (or intended policies) contained within this chapter. However, the wording of Policy OL1 currently creates a very different policy to the one that is intended. Some changes could strengthen, clarify and enhance the policies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 002           | OPP16      | Martyn Walker       | Lancashire Wildlife Trust  | Policy OL1   | Welcome and support the policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 018           | OPP223     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy OL1   | <p>The policy wording suggests that any development in any part of the borough has to meet the purposes of the Peak District National Park. To be consistent with the language used in paragraph 13.5, suggest replacing policy wording to read: <u>“Development within the that part of the planning boundary of Oldham Borough falling within the Peak District National Park, or which impacts on the Peak District National Park will only be permitted where it does not conflict with the purposes of the Peak District National Park.”</u></p> <p>Suggest that a reference to policy 5 of the Saddleworth Neighbourhood Plan and the accompanying map would be a helpful reference to include.</p> <p>Also recommend a revision of paragraph 13.1 to read: “The Peak District National Park is a protected landscape part of <del>that’s</del> <u>which</u> falls within the borough of Oldham.”</p> |

**Table OL2: Responses submitted on Policy OL2 Oldham's Green Belt**

| Respondent ID | Comment ID | Name             | Organisation                                    | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|------------|------------------|-------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP17      | Martyn Walker    | Lancashire Wildlife Trust                       | Policy OL2   | Welcome and support the policy.                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 006           | OPP58      | Gareth Salthouse | Emery Planning - on behalf Mr J Jaskolka        | OL2          | This policy should say that development will be determined in accordance with national Green Belt planning policy guidance. Any additional text requirements are not necessary and subject to being superseded each and every time national planning policy guidance on the Green Belt is amended. Clarification should be provided that affordable housing can be brought forward in accordance with an 'exception' policy set out through the plan. |
| 006           | OPP59      | Gareth Salthouse | Emery Planning - on behalf Mr J Jaskolka        | OL2          | The plan seeks to make minor alterations to the Green Belt boundaries notwithstanding development needs. Welcomes this approach. However, the relevant Topic Paper does not provide any transparency as to what methodology has been followed. It is unclear why certain Green Belt boundaries have been amended and others have not. Not aware of any recent Green Belt Assessment having been carried out to inform this process.                   |
| 016           | OPP156     | Stephen Harris   | Emery Planning - on behalf of Redwaters Estates | Policy OL2   | This policy should say that development will be determined in accordance with national Green Belt planning policy guidance. Any additional text requirements are not necessary and subject to being superseded each and every time national planning policy guidance on the Green Belt is amended. Clarification should be provided that affordable housing can be brought forward in accordance with an 'exception' policy set out through the plan. |
| 016           | OPP157     | Stephen Harris   | Emery Planning - on behalf of Redwaters Estates | Policy OL2   | The plan seeks to make minor alterations to the Green Belt boundaries notwithstanding development needs. Welcomes this approach. However, the relevant Topic Paper does not provide any transparency as to what methodology has been followed. It is unclear why certain Green Belt boundaries have been amended and others have not. Not aware of any recent Green Belt Assessment having been carried out to inform this process.                   |

| Respondent ID | Comment ID | Name                | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------|------------|---------------------|----------------------------------------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 012           | OPP136     | Chris Martin        | Home Builders Federation                                       | Policy OL2   | Paragraph 16 of the NPPF seeks to avoid unnecessary duplication of policies (including those within the NPPF itself). The HBF considers that this policy does not add anything that is not already covered in the NPPF (Section 13). Even if the policy were to be retained, the wording should be significantly reduced to: "Development proposals within Oldham's Green Belt will be determined in line with national planning policy." This would also ensure that the policy picks up on all Green Belt matters including grey belt proposals and make the policy effective. |
| 018           | OPP224     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                     | Policy OL2   | Recommend a specific reference to the Saddleworth Neighbourhood Plan policy 6 would be a helpful addition to the Local Plan. Concerned that the Local Plan says that there is no set definition for "infilling" and sets out some criteria for this, but without putting forward any strong definitions that could be used to assess them when considering a planning application. Suggest that the policy should be revised to better define its terms, for example what is considered a "small gap".                                                                           |
| 019           | OPP262     | Alan Chorlton       | Chorlton Planning Ltd                                          | Policy OL2   | The Plan proposes restricting limited infill in villages to a small gap between existing buildings. This is unnecessary and will prevent a great number of new properties that fit well in already built-up settlements. This should be deleted from the plan and left the decision making to assess the situation on the ground.                                                                                                                                                                                                                                                |
| 025           | OPP307     | Cait O'Dowd         | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy OL2   | Support the overall objectives of the policy and recognises the important role that the Green Belt plays in preventing urban sprawl, safeguarding the countryside from encroachment, and preserving the setting of settlements.                                                                                                                                                                                                                                                                                                                                                  |

| Respondent ID | Comment ID | Name        | Organisation                                          | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------|------------|-------------|-------------------------------------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 031           | OPP365     | Cait O'Dowd | Ashton Hale on behalf of Prestigious Homes North West | Policy OL2   | <p>Supports the overarching objectives of the policy, however, national policy is clear that Green Belt designation does not represent an absolute constraint to development. Where very special circumstances exist, planning permission should be granted. In determining whether very special circumstances apply, decision makers must undertake a planning balance. This involves assessing whether the harm to the Green Belt, by reason of inappropriateness and any other harm, is clearly outweighed by other considerations. This is a qualitative exercise, with no prescribed list of factors that may constitute very special circumstances. It is therefore necessary to consider both individual and cumulative benefits on a case-by-case basis. Furthermore, recent national policy has introduced the concept of "Grey Belt" land, recognising that not all land within the Green Belt performs equally against its purposes. Previously Developed Land, contained sites, or areas with limited contribution to Green Belt purposes should be considered for release where this would support sustainable development objectives, particularly in meeting housing needs. Each of the sites promoted by Prestigious Homes meet criteria for deliverability in NPPF (suitable, available and achievable). In order to meet future housing need sites such as those promoted by Prestigious Homes, particularly where they exhibit characteristics of Grey Belt land, represent logical and sustainable opportunities to contribute towards housing delivery. The release and development of such sites would assist the Council in meeting its housing requirements, maintaining a robust supply of deliverable sites, and reducing the risk of under delivery over the plan period. In accordance with national policy, substantial weight is afforded to any harm to the Green Belt however, the assessment must consider whether that harm is clearly outweighed by other considerations. In this case, the combination of site-specific characteristics and the pressing need to deliver housing in sustainable locations amounts to very special circumstances.</p> |

| Respondent ID | Comment ID | Name        | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------|-------------|-------------------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 032           | OPP376     | Cait O'Dowd | Ashton Hale on behalf of Andy Hulme | Policy OL2   | <p>The landowner supports the overarching objectives of the policy, however, national policy is clear that Green Belt designation does not represent an absolute constraint to development. Where very special circumstances exist, planning permission should be granted. In determining whether very special circumstances apply, decision makers must undertake a planning balance. This involves assessing whether the harm to the Green Belt, by reason of inappropriateness and any other harm, is clearly outweighed by other considerations. This is a qualitative exercise, with no prescribed list of factors that may constitute very special circumstances. It is therefore necessary to consider both individual and cumulative benefits on a case-by-case basis. Furthermore, recent national policy has introduced the concept of "Grey Belt" land, recognising that not all land within the Green Belt performs equally against its purposes. Previously Developed Land, contained sites, or areas with limited contribution to Green Belt purposes should be considered for release where this would support sustainable development objectives, particularly in meeting housing needs. Both sites at Standedge Road meet criteria for deliverability in NPPF (suitable, available and achievable). In order to meet future housing need sites, particularly where they exhibit characteristics of Grey Belt land, represent logical and sustainable opportunities to contribute towards housing delivery. The release and development of such sites would assist the Council in meeting its housing requirements, maintaining a robust supply of deliverable sites, and reducing the risk of under delivery over the plan period. In accordance with national policy, substantial weight is afforded to any harm to the Green Belt however, the assessment must consider whether that harm is clearly outweighed by other considerations. In this case, the combination of site-specific characteristics and the pressing need to deliver housing in sustainable locations amounts to very special circumstances.</p> |

| Respondent ID | Comment ID | Name          | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|------------|---------------|--------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 044           | OPP418     | Edward Taylor | CPRE         | Policy OL2   | The section of the policy that addresses stables states that “the Council will have regard to the design, layout, and form of construction of any buildings to assess the suitability for stabling purposes.” Lighting should be explicitly mentioned as some stables are often very brightly lit, and this can cause harm to wildlife and amenity. Modification proposed as follows: “the Council will have regard to the design <u>including lighting scheme with consideration of its impact on wildlife and amenity</u> , layout, and form of construction of any buildings to assess the suitability for stabling purposes.” |

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

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------|---------------------|----------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP225     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy OL3   | <p>No definition of what is meant by “sympathetic” which leaves a lot of leeway in the way that it is interpreted. Ask that the term be removed or better defined.</p> <p>Note the increased percentage of volume that has been included in point 3 of the policy, and the text in the reasoned justification that indicates that there was a previous informal guide of one third, but that applications have come forward in excess of this rough guide which were allowed. The reasoned justification then suggests that 40% should be a maximum and not a target.</p> <p>Consider rewording criterion 3 to read: “where the individual or cumulative total volume exceeds more than 40% of the volume of the original building, approval is more unlikely to be granted. <u>one third of the volume of the original building, approval is more unlikely to be granted, with a strong presumption against where the volume is over 40%, without very special circumstances.</u>”</p> |



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

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic   | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------|---------------------|----------------------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP18      | Martyn Walker       | Lancashire Wildlife Trust  | Policy OL4     | Welcome and support policy. Paragraph 13.23 states that within time LGS might be used as habitat banks. There is a potential problem with this approach. Given that the biodiversity uplift of a site is calculated from its baseline condition, any works to enhance biodiversity interest in the interim would reduce the percentage uplift into the future. This can lead to sites biodiversity interest lying dormant until sites come online and will be dependent on the state of the BNG market into the future.                                                                                                                                                                 |
| 007           | OPP79      | Andrew Leyssens     | United Utilities           | Policy OL4     | Reflecting the need to give substantial weight to investment in water and wastewater infrastructure, request that the exceptions to this policy include water and wastewater infrastructure and therefore we request the following amendments to this policy: <u>"12. essential water and wastewater infrastructure."</u>                                                                                                                                                                                                                                                                                                                                                               |
| 011           | OPP106     | Emily Hycran        | Historic England           | Policy OL4     | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 011           | OPP109     | Emily Hycran        | Historic England           | Paragraph 15.5 | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 009           | OPP127     | Pauline Shearer     | Sport England              | Policy OL4     | The policy does not provide sufficient protection where the LGS contains a playing field and is inconsistent with NPPF. Suggested amendments/ added wording as follows: the policy needs to define, as with CO1, the difference between outdoor sports and recreation facilities and open space. 'Appropriate' development may still result in the impact on / or loss of playing field - the term needs to be defined; suggested added wording to ensure protection/ replacement provision in line with Sport England Policy; and ensure exceptions are based on Sport England's Playing Fields Policy where that applies more generally for sports facilities based on NPPF para 104. |
| 018           | OPP226     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy OL4     | There is no reference to there being other LGS's defined in planning documents other than this Local Plan, such as the ones set out in the Saddleworth Neighbourhood Plan, under policy 4. There must                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                 |
|---------------|------------|------|--------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |      |              |              | be a reference to these, as well as to any other Neighbourhood Plans which come forward. Have included a report from the Saddleworth Parish Council on a number of additional sites which we suggest should be included in the Local Plan as LGS's. |

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

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|------------|---------------------|----------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP19      | Martyn Walker       | Lancashire Wildlife Trust  | Policy OL5   | Welcome and support the policy, particularly the requirement that development would be expected to demonstrate there is no significant harm impacting on sites of nature conservation value. Would recommend referring to species and not just sites.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 018           | OPP227     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy OL5   | Note that this policy addresses a particular issue encountered in Saddleworth around light spillage and are therefore strongly supportive of this policy. Suggest that the wording might be slightly clearer if revised to read: "proposed lighting <u>does not exceed</u> <del>is</del> the minimum required for ..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 022           | OPP276     | Matthew Broadbent   | Save Royton's Green Belt   | Policy OL5   | The current policy focuses on the design and specification of lighting but does not address how lighting is operated over time. By explicitly requiring consideration of the duration and control of lighting, the policy would be more effective and better aligned with the NPPF, which expects planning decisions to limit the impact of light pollution on amenity, intrinsically dark landscapes, and the natural environment. Modification proposed to criterion a, as follows: "The proposed lighting is the minimum required for security or working purposes, <u>including in terms of its intensity, spatial coverage, and duration of use. Lighting schemes should incorporate measures such as timers, curfews, dimming, or adaptive controls to ensure that lighting is only in use when required;</u> " |

### 13. Responses submitted on the Addressing the Biodiversity Emergency Policies

**Table N1: Responses submitted on Policy N1 Protecting Nature**

The table below also includes general comments submitted in regard to the biodiversity emergency.

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------|------------|---------------------|----------------------------|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP20      | Martyn Walker       | Lancashire Wildlife Trust  | Chapter                     | Agree with and welcome the recognition of the multiple benefits biodiversity plays in our lives and that it recognises that biodiversity has a value in its own right and that the preservation and enhancement of complex and stable eco-systems is a vital function of development planning.                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 002           | OPP25      | Martyn Walker       | Lancashire Wildlife Trust  | Monitoring of the chapter   | Agree with the monitoring indicators but feel some form of species monitoring would be beneficial. Perhaps in terms of area of habitat set aside for specific target species as part of site masterplans or the provision of off-site compensation for the GM LNRS target species.                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 018           | OPP228     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Chapter                     | Strongly support the policies contained within this chapter, one amend suggested.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 002           | OPP21      | Martyn Walker       | Lancashire Wildlife Trust  | Policy N1                   | Fully support this policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 004           | OPP45      | Matt Browne         | Natural England            | Policy N1 (paragraph 14.20) | Welcome the inclusion of peat in the policy but have concerns regarding wording 'in line with national policy' as national policy does not explicitly refer to peat. Paragraph 14.20 states that peat is not currently an irreplaceable habitat. Advise that weight is given to Inspectors' Report of PfE which states that deep peat that is capable of being restored with human intervention (i.e. that which has not been "destroyed") [...] can meet the NPPF definition of an irreplaceable habitat due to its age and rarity. Would like to see policy that protects deep peat from development and extraction to avoid the ambiguity of the current national planning policy and to conform with the PfE Inspector's findings. |

| Respondent ID | Comment ID | Name              | Organisation                                    | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|------------|-------------------|-------------------------------------------------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 004           | OPP46      | Matt Browne       | Natural England                                 | Policy N1 (paragraph 14.21) | The source of data used as an indication for peat presence (England Peat Map) has some inaccuracies in the GM region and so it is suggested that the Council refers to the England Peat Status Greenhouse Gas and Carbon Storage dataset instead.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 001           | OPP52      | Bruce O'Brien     | Emery Planning - on behalf of Oakmere Homes Ltd | Policy N1                   | Suggest that site 'Land to the rear of 69 Broadway, Oldham, OL2 5DD' could be identified as a site allocation for residential development to provide certainty for the landowners and developer and agree with the site no longer being designated as a Green Corridor and Link.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 022           | OPP277     | Matthew Broadbent | Save Royton's Green Belt                        | Policy N1                   | The current wording does not explicitly require consideration of cumulative or masterplan-wide ecological impacts. As a result, the design of key infrastructure can be fixed through incremental applications without a full understanding of their ecological effects across the wider area. The policy needs to be strengthened to ensure consistency with the strategic approach in PfE (in particular Policy JP-G8), which seeks to avoid the fragmentation of habitats and maintain ecological connectivity. It would also ensure that decisions are based on a complete understanding of impacts, rather than being determined by the artificial boundaries of individual planning applications. Modification proposed to final paragraph of policy as follows: "An ecological assessment will be required as part of the planning application where a site contains, adjoins or may impact on a site which contains nature as described in the above hierarchy. <u>Where development forms part of a wider proposal (for example, a strategic allocation, or masterplanned area) the assessment must consider the cumulative and in-combination effects of the wider scheme, including any associated infrastructure, and demonstrate that the proposed development would not result in the fragmentation or severance of ecological networks.</u> " |

| Respondent ID | Comment ID | Name              | Organisation             | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------|------------|-------------------|--------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 022           | OPP278     | Matthew Broadbent | Save Royton's Green Belt | Paragraph 14.20 (Policy N1) | <p>The current wording presents a definitive statement that peat is not irreplaceable habitat, which risks underplaying its ecological importance and does not fully reflect the conclusions reached at the PfE examination. Clarification is needed to: ensure consistency with the evidence and conclusions considered through the PfE examination (see examination hearing documents OD42 and IN37); avoid creating an overly rigid interpretation that could undervalue restorable peat; and reinforce the need for case-by-case ecological assessment, particularly in areas where peatland contributes to wider habitat networks. Modification proposed to paragraph as follows: "14.20 Restorable peat has an important role to play in supporting notable habitats (including blanket bog, lowland raised bog and fens) and for carbon storage. <u>Whether peat is capable of restoration will need to be assessed on a case-by-case basis.</u> Whilst peat is not identified as a separate category of irreplaceable habitat in national policy, at the examination of the Places for Everyone Joint Development Plan Natural England advised that <u>peat which is capable of restoration may, in certain circumstances, constitute irreplaceable habitat. The Inspectors accepted that this is a matter of planning judgment, and accepted that in such circumstances national policy with respect to irreplaceable habitats was applicable.</u>"</p> |

**Table N2: Responses submitted on Policy N2 Restoring Nature**

| Respondent ID | Comment ID | Name          | Organisation              | Policy/Topic | Summary of Comments |
|---------------|------------|---------------|---------------------------|--------------|---------------------|
| 002           | OPP22      | Martyn Walker | Lancashire Wildlife Trust | Policy N2    | Support.            |

| Respondent ID | Comment ID | Name            | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|------------|-----------------|--------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP80      | Andrew Leyssens | United Utilities         | Policy N2    | Note the provision to have regard to 'proximity to loss' when selecting off-site areas. Request that this policy also recognises the principle of locating biodiversity so that it is resilient to future pressures. Request the following amendment: "a. Proximity to loss – there is an expectation that off-site areas will be located as close as possible to the development site, incentivised by the biodiversity metric's spatial risk multiplier, so that the area experiencing loss of biodiversity through the proposed development benefits from the compensation. <u>When selecting a site, it is important that it is resilient to future pressures, e.g., it may not be appropriate to locate BNG immediately adjacent to essential infrastructure which may need expand in the future.</u> " |
| 009           | OPP126     | Pauline Shearer | Sport England            | Policy N2    | This policy encourages BNG provision on areas which could include playing fields. This could put undue pressure on playing field provision and could include BNG measures which do not require planning permission. The policy could result in an unacceptable, nor fully assessed, loss of playing field land.<br>Include an additional avoidance clause: " <u>Any biodiversity enhancements on playing field land will need to meet the requirements of Sport England's Playing Field Policy and Guidance and paragraph 104 of the NPPF.</u> "                                                                                                                                                                                                                                                             |
| 012           | OPP137     | Chris Martin    | Home Builders Federation | Policy N2    | Policy N2 sets out the Council's approach to biodiversity net gain (BNG), confirming its alignment with the national requirement for at least 10% net gain to be achieved. The PPG is clear that plan-makers do not need to duplicate the detailed provisions that is already in the statutory framework for BNG. Consequently, consider that much of this policy can be deleted as elements such as the sequential approach to the location of BNG (and the spatial risk multiplier) are already covered elsewhere and are readily understood. However, support the reference to Local Nature Recovery Strategy (LNRS) areas as an option for achieving BNG, although to ensure the policy is effective, this should not necessarily                                                                        |

| Respondent ID | Comment ID | Name                | Organisation                                                             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------|------------|---------------------|--------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                     |                                                                          |              | affect the ability of developers to achieve BNG through other means (in line with the sequential approach to the location of BNG).                                                                                                                                                                                                                                                                                                                  |
| 018           | OPP229     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                               | Policy N2    | Suggest that this policy would be enhanced by making it clear that offsite areas should be identified and included in planning applications before permission be granted.                                                                                                                                                                                                                                                                           |
| 023           | OPP288     | Natasha Styles      | The Planning Bureau on behalf of McCarthy and Stone and Churchill Living | Policy N2    | Support the policy in its requirement for a minimum of 10% BNG however, the Council should also reconsider the additional wording it proposes with regard to BNG to ensure the policy is in line with the guidance and statutory instruments that the government have recently updated / published regarding statutory BNG. The Council should then amend the preferred options so that it is consistent with any updated guidance and regulations. |
| 025           | OPP303     | Cait O'Dowd         | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium           | Policy N2    | Support the Council's BNG ambitions across the borough, which can be seen reflected within the endorsed Beal Valley Broadbent Moss Masterplan and Design Code.                                                                                                                                                                                                                                                                                      |

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

| Respondent ID | Comment ID | Name          | Organisation              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|------------|---------------|---------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP23      | Martyn Walker | Lancashire Wildlife Trust | Policy N3    | Support the policy, particularly that development proposals would be expected to protect the ecological network and where possible extend or enhance the network. Welcome that development should have regard to Oldham Green Infrastructure Strategy and the 7 stated priority themes. Welcome that the Urban Greening Factor (UGF) requirements should be considered at the earliest possible stage alongside mandatory BNG requirements to ensure these requirements are considered from the outset of design. Suggest that the UGF might be a policy in its own right. Welcome and agree that |

| Respondent ID | Comment ID | Name            | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------|------------|-----------------|--------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                 |                          |              | development can contribute to creating high-quality river corridor, this will also help to create a bigger, better and more joined up nature network.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 003           | OPP38      | Simon Tucker    | Canal & River Trust      | Policy N3    | Important to ensure green and blue infrastructure assets are protected and enhanced to ensure the public benefit from these spaces. Suggest the inclusion of reference to canals and wider blue infrastructure in part three of the policy and expansion of the wider policy to consider promoting surveillance of these spaces where appropriate is considered.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 004           | OPP47      | Matt Browne     | Natural England          | Policy N3    | Suggests including reference to the specific GM LNRS action as further evidence for the policy approach and justification for the policy's section on the UGF: <i>Create dedicated new multifunctional and inclusive green spaces as part of new development and regeneration, to meet the national UGF of 0.3 on commercial and 0.4 on residential development or the local authority set UGF.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 009           | OPP117     | Pauline Shearer | Sport England            | Policy N3    | Supportive of the inclusion of reference to Sport England's Active Design Guidance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 012           | OPP138     | Chris Martin    | Home Builders Federation | Policy N3    | Concerned that the requirements in the policy related to the UGF may not be appropriate in all circumstances. The UGF may not be able to be applied to all sites, and the Council will need to be certain that it is not unduly penalising sites where this score cannot legitimately be provided. Indeed, the rigid application of the UGF can have significant implications in relation to site densities (in light of Policy H2), site layouts, highways, ongoing maintenance, and the viability of development. It is also unclear how this policy's aim is related to Policy N4. To ensure effectiveness and that the approach in Policy N3 is justified, recommend a much less formulaic approach is considered which is more adaptable to site specific circumstances. The reasoned justification mentions the requirement for tree lined streets. This is contained in paragraph 136 of the NPPF. For consistency with national policy, this text should also make reference to footnote 52 which accompanies paragraph 136 and notes that tree lined streets are not required where there are |



| Respondent ID | Comment ID | Name                | Organisation                                                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|------------|---------------------|-------------------------------------------------------------------------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                     |                                                                                           |              | clear, justifiable and compelling reasons why this would be inappropriate                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 018           | OPP230     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                                                | Policy N3    | The limit for the application of points 5, 6 and 7, has been set at 20 homes rather than 10. This is inconsistent with the number of homes set out as relevant in Chapter 18. Although the footnote states that this is the level at which they have deemed it appropriate for meaningful green infrastructure, there is no justification to support this in the text. Suggest that either the number is revised down, or a stronger reasoned justification provided for the higher number. |
| 026           | OPP324     | Cait O'Dowd         | Ashton Hale on behalf of Saddleworth Property Partnership                                 | Policy N3    | Support proposals to increase green links and provide enhanced biodiversity provisions within new developments.                                                                                                                                                                                                                                                                                                                                                                             |
| 030           | OPP354     | Cait O'Dowd         | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Policy N3    | Support proposals to increase green links and provide enhanced biodiversity provisions within new developments.                                                                                                                                                                                                                                                                                                                                                                             |
| 031           | OPP363     | Cait O'Dowd         | Ashton Hale on behalf of Prestigious Homes North West                                     | Policy N3    | Support proposals to increase green links and provide enhanced biodiversity provisions within new developments.                                                                                                                                                                                                                                                                                                                                                                             |
| 032           | OPP374     | Cait O'Dowd         | Ashton Hale on behalf of Andy Hulme                                                       | Policy N3    | Supports proposals to increase green links and provide enhanced biodiversity provisions within new development.                                                                                                                                                                                                                                                                                                                                                                             |

| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------|------------|----------------|-------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 042           | OPP406     | Michael Parham | Lichfields on behalf of Russell LDP | Policy N3    | <p>Generally, support the principle of new development offering improvements to green infrastructure, but there is concern that applying a formula to all potential development sites may not be appropriate in all circumstances. This is particularly for employment development, with specific operational requirements which can limit the extent of land available to deliver green infrastructure improvements on site. For employment sites, the inclusion of a small scale of urban infrastructure could have more drastic implications on the layout, particularly with regard to vehicle tracking and logistics. Applying the UGF rigidly could restrict the developable area and constrain the amount of employment floorspace delivered. This is particularly important in employment sites where this could work against draft Policy E1 (it has already been noted under the consideration of E1 that the need for employment space is likely to be greater than this when accounting for the correct plan period of 2022-2042). While the viability assessment for the Local Plan has considered the direct costs of urban greening, it is unclear whether the viability case has accounted for the potential implications of the amount of employment floorspace that can be delivered and the efficiency of site layouts. This should be revisited if the policy is to be found sound. As such, the application of the policy should be done so flexibly for employment development sites in particular. In relation to reference to 'tree lined streets' reference should also be made to footnote 52 of NPPF, which clarifies that tree-lined streets are not required where there are clear, justifiable and compelling reasons why this would be inappropriate. This is particularly relevant in employment areas. The Policy should be revisited to ensure that appropriate evidence has been gathered to support the Urban Greening Factor for employment developments. Otherwise, this policy requirement should be removed or an alternative threshold provided which is evidence by a viability assessment.</p> |

| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                        |
|---------------|------------|-------------|----------------------------------------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 025           | OPP432     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy N3    | Policy notes that new development is expected to make an appropriate contribution to addressing local needs and opportunities for Green Infrastructure provision. Support the Council's proposals, as set out within the Beal Valley & Broadbent Moss Spatial Design Code. |

**Table N4: Responses submitted on Policy N4 Trees**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|------------|---------------------|----------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP24      | Martyn Walker       | Lancashire Wildlife Trust  | Policy N4    | Support the policy. Welcome that scale and nature of tree planting should consider strategies such as green infrastructure strategy and the GM LNRS. Particularly welcome the reference to restorable peat soils taking precedence                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 012           | OPP139     | Chris Martin        | Home Builders Federation   | Policy N4    | Consider that the tree replacement ratios proposed have the potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments (notably the requirements in Policy H2), this in itself has potential to have a significant impact on the viability of developments. Whilst the cost of Policy N4 is taken into account in the Local Plan Viability Assessment, this is only the physical costs of the trees and not the knock-on effect this has on site densities. This appears to have little thought behind it and undermines the effectiveness of the policy and leaves it unjustified. |
| 018           | OPP231     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy N4    | Support the policy, and particularly welcome the additional protection of ancient woodland. Note that within the Peak District National Park, and in the higher uplands of Saddleworth, where there is peatland, there should be a specific awareness of where there is a different requirement in terms of tree planting and ask for a clear reference to the detail added by the Neighbourhood Plan.                                                                                                                                                                                                                                                                       |

| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------|------------|----------------|-------------------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 042           | OPP407     | Michael Parham | Lichfields on behalf of Russell LDP | Policy N4    | <p>Welcome the objective of replacement tree planting in principle; however, the proposed tree replacement ratios could have a significant impact on the developable area of employment sites. The scale of replacement planting required has the potential to materially affect land take within employment allocations, thereby reducing the amount of developable land available for employment floorspace. This in turn could constrain the overall delivery of employment development and undermine the efficient use of allocated sites. The Local Plan Viability Assessment only reflects the direct costs of purchasing and planting replacement trees and not for the cost of the ongoing future management and maintenance. It does not appear to account for the consequential impacts on site layout and developable area that may arise from the proposed replacement requirements. These indirect impacts could have significant implications for the viability and deliverability of employment development in the JPA2 allocation. As currently drafted, the policy therefore risks placing disproportionate constraints on employment sites without sufficient evidence to justify the scale of replacement planting proposed. PfE Policy JP-G7 requires that trees be replaced in a ratio of 2:1. This is a much more consistent approach, rather than the number of replacement trees being dictated by trunk diameter. Furthermore, it is not clear why this Local Plan seeks to deviate away from the PfE policy which it needs to align with. Table N1 should be removed from the Policy.</p> |

## 14. Responses submitted on the Historic Environment Policies

**Table HE1: Responses submitted on Policy HE1 The Historic Environment**

The table below also includes general comments submitted in regard to Oldham's historic environment.

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic        | Summary of Comments                                                                                                                                                                                                                                                                                                                                                            |
|---------------|------------|---------------------|----------------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 003           | OPP39      | Simon Tucker        | Canal & River Trust        | Terminology         | Welcome these policies and its designation of canals as non-designated heritage assets. Suggests for clarity purposes maintaining consistency in the text between 'non-designated heritage assets' and 'non-designated assets' by ensuring all are read as 'non-designated heritage assets'.                                                                                   |
| 011           | OPP107     | Emily Hycran        | Historic England           | Paragraph 15.1      | Support.                                                                                                                                                                                                                                                                                                                                                                       |
| 011           | OPP108     | Emily Hycran        | Historic England           | Paragraph 15.5      | Support.                                                                                                                                                                                                                                                                                                                                                                       |
| 003           | OPP40      | Simon Tucker        | Canal & River Trust        | Policy HE1 (Part 8) | Phrasing of 'restoration' of canals could lead to some confusion with canal restoration (abandoned canals). Requests amending the text in part 8 to be either more explicit and read "protect and enable <del>restoration and improved</del> appreciation of canals" or be removed.                                                                                            |
| 011           | OPP429     | Emily Hycran        | Historic England           | Policy HE1          | Support.                                                                                                                                                                                                                                                                                                                                                                       |
| 018           | OPP232     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy HE1          | Suggest that more detail is needed on point 6, which seeks to 'acknowledge' and 'recognise' historic assets. Suggest that in order for this to be useful for planners, developers and residents, more clarity is required on what is meant by those terms in the reasoned justification, and an explanation of the weight being given to these assets in the planning process. |

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

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                         |
|---------------|------------|---------------------|----------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 011           | OPP110     | Emily Hycran        | Historic England           | Policy HE2   | Support.                                                                                                                                                    |
| 018           | OPP233     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy HE2   | The Saddleworth Neighbourhood Plan's heritage policy, policy 10, is in strong conformity with this policy, and gives more detail in specific circumstances. |

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

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                         |
|---------------|------------|---------------------|----------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 011           | OPP111     | Emily Hycran        | Historic England           | Policy HE3   | Support.                                                                                                                                                                                                                                                                                                    |
| 018           | OPP234     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy HE3   | Two conservation area appraisals have been done (separate to the Oldham Town Centre Conservation area) and have not been included as part of the appendices to this document. While they are not recent, they are the best supporting information currently available, and would recommend their inclusion. |

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

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                |
|---------------|------------|---------------------|----------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 011           | OPP112     | Emily Hycran        | Historic England           | Policy HE4   | Support.                                                                                                                                                                                                                                                                                           |
| 018           | OPP235     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy HE4   | Broadly supportive of the policy but note that there are a number of mills which have already been converted or are in use but which remain visually part of the wider street scene which do not seem to be referenced. Consideration should be given to referencing these in the policy approach. |

|     |        |                   |                          |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----|--------|-------------------|--------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 022 | OPP279 | Matthew Broadbent | Save Royton's Green Belt | Policy HE4 | Aspects of Policy HE4 conflict with other Local Plan and PfE policies. Comments also made on the Oldham's Mill Strategy with regards to the approach to assessment and scoring, concept of mill clusters, consideration of landscape impact and justification of protectionist approach in light of grey belt. Several modifications are proposed including additional wording to the first paragraph of the policy; additional wording in relation to proposals being assessed on a site-by-site basis; additional wording under the 'High Priority Mills' and 'Medium Priority Mills' sections; and a deletion of the 'Mill Cluster's part of the policy. See full modifications proposed in representation. |
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**Table HE5: Responses submitted on Policy HE5 Canals**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------|------------|---------------------|----------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 003           | OPP41      | Simon Tucker        | Canal & River Trust        | Policy HE5   | Phrasing of 'restoration' of canals could lead to some confusion with canal restoration (abandoned canals). Requests amending the text to read "To ensure that the future <del>restoration</del> <u>conservation and enhancement</u> of canals is enabled, development alongside the line of the canal and towpath shall not prevent the conservation and enhancement of the waterway's heritage and built environment. Green Infrastructure incorporating walking, wheeling and cycling routes and heritage interpretation features along its line should be provided." |
| 011           | OPP113     | Emily Hycran        | Historic England           | Policy HE5   | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 018           | OPP236     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy HE5   | Broadly supportive of the policy but note that it focuses on the setting and appearance of the canal, heritage and green infrastructure. Suggest that there should be a much wider exploration of benefits, particularly of already restored canals, including tourism assets.                                                                                                                                                                                                                                                                                           |

## 15. Responses submitted on the Achieving High Quality Design Policies

**Table D1: Responses submitted on Policy D1 Achieving High Quality Design**

The table below also includes general comments submitted in regard to design.

| Respondent ID | Comment ID | Name            | Organisation              | Policy/Topic               | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|------------|-----------------|---------------------------|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 0154002       | OPP27      | Martyn Walker   | Lancashire Wildlife Trust | Policy D1                  | Welcome and support the policy, especially point 9.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 003           | OPP42      | Simon Tucker    | Canal & River Trust       | Policy D1 (Point 2 and 11) | Welcome the policy with no significant issues however suggests some wording changes to help avoid defensive boundary treatments in sensitive areas such as the canal corridor.<br>Additional suggested text:<br>"2) encourage and facilitate active travel with convenient, safe and inclusive pedestrian and cycling routes and promote wayfinding for all travel modes; <u>ensure any interface with adjoining spaces is positive, well designed and sensitive to its context; and</u><br>11) ensure that the design and layout minimises actual and perceived opportunities for crime, anti-social behaviour, disorder and terrorism; <u>through well considered natural surveillance appropriate to the site's context.</u> " |
| 007           | OPP81      | Andrew Leyssens | United Utilities          | Policy D1                  | Request that this policy refers to a site-wide infrastructure strategy that ensures a co-ordinated and holistic approach: "10. adopt a comprehensive and co-ordinated approach to development, <u>supported by a site-wide infrastructure strategy</u> , respecting existing site constraints including utilities situated within, and running through, the site. <u>Fragmented approaches to infrastructure delivery will not be acceptable where sites are part of a wider site;</u> "                                                                                                                                                                                                                                          |
| 011           | OPP114     | Emily Hycran    | Historic England          | Policy D1                  | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 009           | OPP118     | Pauline Shearer | Sport England             | Policy D1                  | Supportive of the inclusion of reference to Sport England's Active Design Guidance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |



| Respondent ID | Comment ID | Name            | Organisation                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------|------------|-----------------|--------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 015           | OPP151     | Natalie Belford | Manchester Airport Group (MAG) | Policy D1    | Welcome the amendments that have been made to the policy since comments were submitted on the Draft Local Plan. Do not seek any modifications, however, would like to highlight that there are some buildings in the southeast of the borough where buildings, structures, erections and works would have the potential to be an obstacle and/or impact on radar at a lower height threshold than that of a tall building. Should refer to the aerodrome safeguarding map for Manchester Airport for further details on the extent of these areas and the requirement for consultation with MAG. Recommend that further consideration is given to whether the text included at D1(b) in respect of tall buildings should be more widely applicable to other types of development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 012           | OPP140     | Chris Martin    | Home Builders Federation       | Policy D1    | In general, agree with the key principles in the policy, however the policy requires consistency with local design guides. These are then listed in the reasoned justification (paragraph 16.6), however none of these are development plan documents and therefore requiring that development adheres to these documents is not appropriate, as the implication is that through Policy D1 they are effectively given development plan status when they have not been scrutinised in the same manner. To be consistent with national policy, policy should seek to ensure that applicants have 'regard to' local design guides. The policy also mentions that developments that raise significant design issues will be expected to undergo a local design review. Generally supportive of the use of design reviews, but it will be important that this tool is used appropriately and proportionately. Comments provided on the use of design review and considerations. The concern is that the threshold for when a design review is required, plus the actual process of the design review is unclear at this time. This does not provide certainty for applicants and if the design review threshold is too low or the process is ill defined or overly complex, this may lead to significant delays in determining planning applications/ sites coming forward. The |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|               |            |                     |                            |              | Council should clearly set out more information on how design review panels will operate in order to make the policy effective.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 018           | OPP237     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy D1    | Support the policy. Note the Neighbourhood Plan policies on masterplans and Chew Brook Vale (11 and 12) and the strong conformity with this approach.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 020           | OPP264     | Graeme Moore        | Individual                 | Policy D1    | The design policies are unsound. They are not justified - the plan is not the most appropriate strategy when considered against the reasonable alternatives and is not based on proportionate evidence. The Draft Plan (December 2023) included a mandatory Design Scrutiny policy (Policy D3) with defined thresholds for design review and a requirement for Building for a Healthy Life assessment for schemes of 10 or more dwellings. The Publication Plan replaces this with a single permissive sentence. The entirety of what replaced the mandatory Draft Plan Policy D3 is a single sentence in the body of Publication Plan Policy D1, together with a footnote definition. A footnote in the policy defines design review as 'an independent consideration of the planning application proposal undertaken by a panel of relevant professionals prior to the formal determination of the proposal by the Council, with all costs met by the applicant.' This is a doubly permissive formulation. 'Developments that raise significant design issues' is undefined and entirely subjective — in the absence of thresholds, the judgment of whether a proposal raises significant design issues falls entirely to the planning officer assessing the application. As Oldham has no urban design officer that assessment will be made by a development management officer without specialist design qualifications, facing a development applicant with a professional design team. 'Where appropriate' adds a second layer of discretion on top of the first. There are no thresholds, no triggers, no mandatory timing requirement, no cost recovery mechanism referenced in the policy, and no requirement for design review to happen early in the process rather than before determination. This is a significant contrast with Draft Plan Policy D3 |

| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|------------|-------------|----------------------------------------------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |             |                                                                |              | <p>which required design review for any residential development of more than 50 dwellings — unconditionally, buildings over 18m, for major developments in conservation areas, and for any scheme accompanied by a masterplan. These are precisely the development types that carry the greatest risk of poor design outcomes and the greatest potential for long-lasting harm if that risk materialises, and these are also exactly the types of development that are coming forward at strategic sites within the plan period. The reasoned justification of Policy D1 refers to the Design Council's guidance on design review, but the policy never specifies when they are required.</p> <p>Modification requested for the reinstatement of a standalone design scrutiny policy based on the Draft Plan's Policy D3, with defined mandatory thresholds for design review and a requirement for Building for a Healthy Life assessment, together with targeted strengthening of Policy D1 to address the absence of specific design standards for key development typologies.</p> |
| 025           | OPP308     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy D1    | Support the approach to strategic development set out in the policy. The detailed masterplan framework for Beal Valley and Broadbent Moss provides the appropriate mechanism through which the design principles of Publication Policy D1 can be applied in a site-specific manner.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 028           | OPP333     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd          | Policy D1    | Policy D1 makes specific reference to the fact that "proposals for strategic development should be supported by a design-led masterplan or framework and, where appropriate, a site-specific design code to show how it achieves the principles above". Support this approach.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 029           | OPP342     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd          | Policy D1    | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 042           | OPP408     | Michael Parham | Lichfields on behalf of Russell LDP | Policy D1    | The policy should specifically remove the requirement for design codes or overall masterplans for strategic employment allocations. The Policy should be amended to specifically reference the Stakehill Industrial Estate allocation JPA2 as excluded from requiring compliance with design codes or an overall masterplan.                                                                                                                                                                                                                               |
| 044           | OPP419     | Edward Taylor  | CPRE                                | Policy D1    | Point 9 is generally positive but more could be said about encouraging and preserving local biodiversity. Modification proposed: '9) incorporate appropriate landscaping and urban greening, such as green roofs, green walls, trees and shrubs and support nature through the incorporation of wildlife-friendly features (such as nest boxes) <u>and integration with the nature recovery network; and the preservation and enhancement of local biodiversity;</u> '                                                                                     |
| 044           | OPP420     | Edward Taylor  | CPRE                                | Policy D1    | New criterion proposed: <u>"14. In urban areas, especially near to public transport nodes, the policy should recognise that where appropriate and taking into consideration housing needs, local character and appropriate building forms, high quality urban design can enable higher densities and mixing of uses such as ground floor non-residential uses with residential above so as to make more efficient use of land, improve viability of services including public transport, promote active travel and reduce pressure on the green belt."</u> |

**Table D2: Responses submitted on Policy D2 Advertisements, Signage and Shop Fronts**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                |
|---------------|------------|---------------------|----------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 011           | OPP115     | Emily Hycran        | Historic England           | Policy D2    | Support.                                                                                                                                                                                           |
| 018           | OPP238     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy D2    | Support the policy insofar as it goes but have concerns that the references to advertising in conservation areas simply states that the advertising should be compliant with policies HE2 and HE3, |

|  |  |  |  |  |                                                                                                                                                                                   |
|--|--|--|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  |  |  |  | which do not mention advertising. Strongly suggest the policy should actively strengthen the conditions applied to advertising in conservation areas if it is to have any impact. |
|--|--|--|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Table D3: Responses submitted on Policy D3 Creating a Better Public Realm in Oldham**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------|------------|---------------------|----------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP28      | Martyn Walker       | Lancashire Wildlife Trust  | Policy D3    | Welcome that the policy includes the requirements set out within points 5 and 7 in line with policy OL5 and N3 respectively.                                                                                                                                                                                                                                                                                                                                               |
| 018           | OPP239     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy D3    | Suggest removing “in Oldham” from the title. This is the Local Plan for the borough, and this does not need to be there. Note that there is no reference to antisocial behaviour. While this is referenced elsewhere in the document, suggest that it would be much clearer for this to be explicitly referenced here. Neighbourhood Plan policy 13 on safety and wellbeing is in strong conformity with this policy (and would be even more so following this inclusion). |

**Table D4: Responses submitted on Policy D4 Extensions and alterations to, and development within the curtilage of, a dwellinghouse**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                  |
|---------------|------------|---------------------|----------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP82      | Andrew Leyssens     | United Utilities           | Policy D4    | Request that an additional criterion is added which states: “ <u>6. it would not adversely impact the ability to access and maintain existing underground water and wastewater services.</u> ” This is recommended as the curtilages of residential properties can include water and wastewater assets. Suggested text also provided for the reasoned justification. |
| 018           | OPP240     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy D4    | Support.                                                                                                                                                                                                                                                                                                                                                             |

## 16. Responses submitted on A Sustainable, Active, Accessible Network for Oldham Policies

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

The table below also includes general comments submitted regarding transport.

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic                          | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------|---------------------|----------------------------|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP241     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Chapter title                         | Suggest removing "for Oldham" from the title. This is the Local Plan for the borough, and this does not need to be there.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 024           | OPP289     | Adam Johnson        | National Highways          | Policies T1 and T5, and evidence base | Note that refinements have been made since Regulation 18 that improve the clarity of its transport policy framework and brings it more closely into alignment with national policy. The revised drafting of Policies T1 and T5 introduces clearer expectations around early engagement, cumulative transport assessment and the use of vision-led transport analysis. These elements provide a more structured foundation for considering the relationship between proposed development and the SRN. However, the transport evidence available at Regulation 19 remains incomplete. While references are made to the PfE evidence base, this material only covers a subset of the development proposed across Oldham and the wider area. It cannot therefore be relied upon to demonstrate the combined impact of the Local Plan allocations alongside cross-boundary development. As a result, the overall effect of the Plan on the SRN, including key junctions on the A663 Broadway, A627(M), M60 and M62, cannot yet be understood. This is of particular concern given the concentration of growth around several locations with direct SRN interaction. These areas link into heavily used regional routes and have dependencies on movements from neighbouring districts. Without a consolidated cumulative assessment, the level of SRN impact; the nature of required mitigation; and the point at which interventions may be needed, remain undefined. This is due to evidence not being updated or provided in sufficient detail, with that presented in the PfE being of its time. National Highways would expect to work with the Council |

| Respondent ID | Comment ID | Name                | Organisation                  | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|               |            |                     |                               |              | and understand the impacts and requirements both individually and cumulatively on the SRN. Comments also provided on the Transport, Housing and Employment Topic Papers and the Infrastructure Delivery Plan. National Highways seek clarification from Oldham Council regarding how this will be addressed and how any future mitigation requirements will be integrated into the policy and delivery framework.                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 003           | OPP43      | Simon Tucker        | Canal & River Trust           | Policy T1    | Welcome the inclusion of part 5 with its inclusion on improving cycle/walking routes alongside new development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 009           | OPP119     | Pauline Shearer     | Sport England                 | Policy T1    | Supportive of the inclusion of reference to Sport England's Active Design Guidance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 018           | OPP242     | Cllr Sam Al-Hamdani | Saddleworth Parish Council    | Policy T1    | The policy references the "Standedge Tunnels" project. Not aware of any existing Standedge Tunnels project. Suggest that if this is an existing policy, an explanation should be given. However, there are no references to the electrification of the rail line, or to high-speed rail. Should these be included also?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 024           | OPP290     | Adam Johnson        | National Highways             | Policy T1    | Overall supportive of this policy, noting that this may allow for an early view of cumulative impacts on the SRN, if and when development sites enter into planning. If required, this should allow National Highways to engage with both Oldham Council and developers as to any mitigations and associated timescales, enabling development to come forward without detrimental impact to the operation of the SRN. However, generally consider the planning application stage to be too late to fully realise the requirements for cumulative mitigation. Where multiple planning applicants may be required to undertake cumulative mitigation, there is a risk that their sites may be held back because of funding or viability concerns. It is therefore important that such matters are considered during the Local Plan stage and any necessary mitigations identified at this point. |
| 025           | OPP309     | Cait O'Dowd         | Ashton Hale on behalf of Beal | Policy T1    | Support the inclusion of Policy T1, the Beal Valley and Broadbent Moss allocations are very well placed to deliver this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|------------|----------------|-------------------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                | Valley Broadbent Moss Consortium    |              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 042           | OPP409     | Michael Parham | Lichfields on behalf of Russell LDP | Policy T1    | <p>Given that extensive work has been undertaken to understand the transport mitigation required for each PfE allocation, the draft policy should be clear that for strategic allocations where there is already appropriate highways mitigation in place, no additional contributions beyond what is appropriate will be sought. The policy currently creates uncertainty and introduces the risk that additional, potentially unjustified, transport contributions could be sought through the development management process. The Viability Assessment considers the delivery of the objectives of the policy as having an indirect influence on development viability, but it has not considered the direct effects of the infrastructure requirements for PfE allocations, such as JPA2, which could affect the likelihood of development coming forward. While the objective of ensuring adequate infrastructure is supported, the requirement for transport infrastructure to be in place prior to the occupation of development is overly rigid and does not reflect the practical realities of delivering large-scale strategic employment sites. The policy should introduce more flexibility for a phased approach to the delivery of transport infrastructure where this relates to the Stakehill Industrial Estate extension, to allow for the phased delivery of the extension. In this context, it is important to highlight that financial contributions requested by the Council should meet the tests as set out in Paragraph 58 of the NPPF. This element of national policy should be specifically referenced in the policy text to ensure that contributions sought on development coming forward in the Stakehill Industrial Estate are necessary, appropriate and proportionate to the scale of development coming forward. Request that the Policy be amended to provide specific reference to strategic allocations in the PfE and introduce flexibility for the phased delivery of the JPA2 allocation and that it is updated to make reference to the tests set</p> |



| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                        |
|---------------|------------|------|--------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |      |              |              | out in NPPF para 58 and that it is made clear than any financial contributions required by the Council will be considered in this context. |

**Table T2: Responses submitted on Policy T2 Travel Hubs and Park and Ride Facilities**

| Respondent ID | Comment ID | Name                | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------|------------|---------------------|----------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP243     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                     | Policy T2    | Support the policy and note the strong conformity with Saddleworth Neighbourhood Plan policies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 025           | OPP310     | Cait O'Dowd         | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy T2    | Support the inclusion of Policy T2 and the Beal Valley and Broadbent Moss allocations are very well placed to deliver this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 044           | OPP421     | Edward Taylor       | CPRE                                                           | Policy T2    | Park and Ride Facilities can reduce car journeys but generally tend to do so only when they are located near to journey origin such as a residential area rather than when located close to their destination. Studies cited to provide further information. It needs an integrated policy approach to transport, encompassing (restricted) car use, (improved or improved access to) public transport, walking and cycling etc. and must be based on an integrated understanding of travel behaviour, infrastructures, operators and policy. Modification proposed: "1. forms part of a wider strategy for increasing the use of public transport and active travel <u>based on an integrated understanding of travel behaviour including infrastructures, operators and policy including restricting car use and improving access to public transport, walking and cycling and regulating any unintended effects, especially improper use etc.</u> and has been developed in conjunction with Transport for Greater Manchester and, where appropriate, other organisations such as Highways |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                |
|---------------|------------|------|--------------|--------------|----------------------------------------------------------------------------------------------------|
|               |            |      |              |              | England and Network Rail. <u>The use and impact of the facility should be regularly monitored.</u> |

**Table T3: Responses submitted on Policy T3 Parking Provision**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------|------------|---------------------|----------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP83      | Andrew Leyssens     | United Utilities           | Policy T3    | Request that this policy also refers to including sustainable water management measures in the landscaping of any parking: “The design of parking areas needs to include <u>sustainable water management measures in the landscaping for the site and pedestrian-only safe routes through and around parking areas.</u> ”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 018           | OPP244     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy T3    | Support the policy and note the strong conformity of Neighbourhood Plan policies. Note the inclusion of policy looking at off-site parking and mitigation measures. Suggest that it may be possible to include reference to existing guidance on the provision of sufficient visitor parking etc on larger developments, to increase the likelihood of developments meeting that guidance.                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 020           | OPP265     | Graeme Moore        | Individual                 | Policy T3    | Concerned with the absence of a policy establishing maximum car parking standards for new development across the borough - the absence renders the plan unsound. The Draft Plan (December 2023) included Policy T3 — Car Parking Standards in Oldham, together with Appendix 12, which set out quantified maximum parking standards for a range of uses across two area types. The council has removed Appendix 12 and replaced the quantified standards with a criteria-based policy, without publishing a replacement evidence base to justify that change. The Publication Plan's Topic Paper states that the council met with National Highways and TfGM and that 'both parties were satisfied with the amendments on Policy T3.' This sign-off does not address the soundness of the Publication Plan. National Highways and TfGM |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|------------|------|--------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |      |              |              | <p>were consulted on the policy mechanics and highway safety criteria — matters properly within their remit. Neither body is the arbiter of whether the removal of quantified standards constitutes a failure of justification or effectiveness under the NPPF soundness tests. Their satisfaction with the amended policy wording does not constitute evidence that a criteria-based approach will produce equivalent outcomes in terms of managing parking demand at accessible locations. The representation provides sections evidencing the need for parking standards, citing managing the road network and congestion; efficient use of land/ compliance with minimum density standards set out in PfE Policy JP-H4 (and the publication plan policy); the climate emergency/ need to reduce emissions.</p> <p>Modification requested for the insertion of a policy establishing maximum car parking standards for new development, based on the variable two-tier (Area Type A / Area Type B) framework set out in this representation and the accompanying draft Annex of standards. The full proposed standards are set out as an annex to the representation.</p> |

**Table T4: Responses submitted on Policy T4 Electric Vehicle Charging Infrastructure**

|  | Respondent ID | Comment ID | Name         | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--|---------------|------------|--------------|--------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | 012           | OPP141     | Chris Martin | Home Builders Federation | Policy T4    | <p>This policy sets out requirements for electric vehicle charging for new development. However, the requirements for electric vehicle charging infrastructure are already clearly set out in Part S of Building Regulations. The Government is clear that this is the standard which should be followed and there is no mechanism for going over and above this in the plan-making system. As such, this policy is superfluous and</p> |

|  | Respondent ID | Comment ID | Name                | Organisation                        | Policy/Topic                                     | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--|---------------|------------|---------------------|-------------------------------------|--------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |               |            |                     |                                     |                                                  | in line with paragraph 16 of the NPPF, should be deleted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|  | 018           | OPP245     | Cllr Sam Al-Hamdani | Saddleworth Parish Council          | Policy T4                                        | Support the policy and note the strong conformity with Saddleworth Neighbourhood Plan policies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|  | 022           | OPP280     | Matthew Broadbent   | Save Royton's Green Belt            | Paragraphs 17.33 – 17.37 Reasoned justification) | Paragraphs 17.33 to 17.37 have been misnumbered.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|  | 042           | OPP410     | Michael Parham      | Lichfields on behalf of Russell LDP | Policy T4                                        | The Viability Assessment has considered costs for residential developments but has not considered costs for commercial development. The costs are also taken from data in 2019, and we are aware nationally that the costs of installing EV charging facilities have risen significantly since this time, which also hasn't been accounted for in the assessment. Accounting for the cost of the charging equipment is only part of the picture, and any viability assessment should also consider the knock-on consequences of providing more electrical infrastructure at a site. By including additional levels of EV charging, there is likely to be an additional requirement for the provision of onsite electricity substations which are also expensive to deliver. This should be fully factored in for all major developments, not just the cost of the EV charging kit itself. In addition, the policy requires a further 20% of spaces shall accommodate appropriate ducting infrastructure to facilitate future provision, the costs of which represent another significant burden for future developers, which has not been considered in the Viability Assessment. It is unclear whether the appropriate viability evidence has been considered for the policies impact on non-residential developments, which puts into question |

|  | Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                   |
|--|---------------|------------|------|--------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |               |            |      |              |              | whether the policy is justified. The policy should be updated to provide proportionate viability justification for the requirement of electric vehicle charging facilities on non-residential development in line with the tests set out in the NPPF. |

**Table T5: Responses submitted on Policy T5 Vision-led Transport Statements, Transport Assessments and Travel Plans in New Development**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------|------------|---------------------|----------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP246     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy T5    | Support the policy. Note that the text on Holcroft Moss requires that any developments that require a Transport Assessment will need to consider air quality impacts on Holcroft Moss. Given the distance of much of the borough from Holcroft Moss, should this apply to all developments?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 024           | OPP291     | Adam Johnson        | National Highways          | Policy T5    | The policy makes significant reference to the provision and requirement of engagement with National Highways for sites where affects may be observed on the SRN, with this engagement sufficient to be undertaken within statutory timescales. It is additionally seen that these impacts are to be assessed with cognisance of cumulative impacts of sites within the vicinity rather than each site in isolation and that this will be presented within the body of evidence on a site-by-site basis. It is recommended that Oldham Council produce a suitable body of evidence for larger strategic sites to support the Vision goals for developments to encourage modal shift for short- and medium-distance trips, and that they should consult with National Highways with regards to how this may be applied to reduce the potential for impacts on the SRN. This approach should follow the guidance in the Working with National Highways to Delivery a Vision-Led Approach for Local Plans (December 2025) document. Overall supportive of the policy, but confirmation should be provided by Oldham Council as to whether the cumulative impacts will take identified cross-boundary PpE sites into account for future baseline assessments, which may also impact the operation of the SRN. |

## 16. Responses submitted on the Communities Policies

**Table CO1: Responses submitted on Policy CO1 The Protection of Open Space, Sport and Recreation Provision**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|------------|---------------------|----------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 009           | OPP120     | Pauline Shearer     | Sport England              | Policy CO1   | <p>The policy is confusing as it sets out what is broadly needed for sports and recreation and then splits those into separate policy requirements which are unclear.</p> <p>Second part of the policy may not offer sufficient protection for playing fields, pitches and outdoor sports provision - playing field loss should be avoided and term 'have regard to' is too weak, whilst final paragraph is ambiguous with use of 'where appropriate' in considering replacement provision.</p> <p>Sport England would prefer to see two separate policies for Open Space and Outdoor Sport and Recreation Facilities, however several amendments are put forward to the existing policy including: Removal of footnote 158 and 160, rewording of point 2, rewording of paragraph 3. And several amendments to the second part of the policy under the heading 'Playing fields, pitches and outdoor sports provision have been suggested, including replacement of paragraph 2 and removal of the final paragraph in this section. See full representation for exact modifications requested.</p> |
| 018           | OPP247     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy CO1   | <p>Support the policy and note the strong conformity with policy 21 of the Saddleworth Neighbourhood Plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Respondent ID | Comment ID | Name               | Organisation                                    | Policy/Topic                        | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|------------|--------------------|-------------------------------------------------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 043           | OPP415     | Sebastian Tibenham | Pegasus Group on behalf of DWFCO                | Policy CO1                          | Overall, policy is acceptable and provides sufficient flexibility. However, it's restrictive nature must therefore mean that the areas to which this policy applies must be fully justified by a clear understanding of how the area functions and is used. Firstly, question the reference to subsequent updates. The policy should be founded on tangible and accessible evidence base to demonstrate why the designations should apply now. Secondly, the 2022 Open Space Study has not been issued as a key evidence base document as part of this consultation process. This should be rectified, and the full assessment should be made publicly available before the Local Plan is submitted to the SoS for examination and a further discrete round of consultation undertaken once the full content of this document has been made available. Aware that site proforma assessments were carried out in a number of cases and we request that these are made available as it is not transparent at this stage as to why certain sites have been included as an open space designation. |
| 043           | OPP416     | Sebastian Tibenham | Pegasus Group on behalf of DWFCO                | Policy CO1- Open Space Designations | Particular concern with two open space designations that are identified: Woodhouses Trotting Track; and areas of land between Woodhouses and Failsworth Reasons provided as to why the sites should not be designated as open spaces.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 001           | OPP53      | Bruce O'Brien      | Emery Planning - on behalf of Oakmere Homes Ltd | Policy CO1                          | Suggest that site 'Land to the rear of 69 Broadway, Oldham, OL2 5DD' could be identified as a site allocation for residential development to provide certainty for the landowners and developer and agree with the site no longer being designated as a Green Corridor and Link and open space.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |



**Table CO2: Responses submitted on Policy CO2 New and Improved Open Space, Sport and Recreation Provision**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------|------------|---------------------|----------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 002           | OPP29      | Martyn Walker       | Lancashire Wildlife Trust  | Policy CO2   | Support and welcome point 4 that new open space should be well connected to the existing GI network and have regard to the Council's GI strategy. The type of habitats created within new open space should also have regard to the GM LNRS where appropriate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 009           | OPP121     | Pauline Shearer     | Sport England              | Policy CO2   | Combining Open Space and Sport and Recreation will result in confusion – prefer to see two separate policies. Paragraph one it reads as one singular provision whereas they are two very distinctive types. It should be made clear that the open space standards do not apply to outdoor sports and recreation provision. Term 'site by site' should be removed. Several amendments are proposed including: amendment to paragraph 5; removal of outdoor sports provision from under the heading for 'Open Space Standards'; caveat introduced for table CO1 and in Value Standard section to remove reference to outdoor sports provision/ playing field sites; footnote added in terms of Built Facilities Strategy; and amendments to paragraph 18.22 of the policy reasoned justification. See full representation for exact modifications requested. |
| 018           | OPP248     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy CO2   | Note the possible inconsistency between policy N3 which refers to 20 homes, where this refers to 10 homes. The Open Spaces Study is included in the policy, but the reference to find it is only included in the Reasoned justification which comes later, not in the first reference to it in the policy text. Suggest that the footnote with the reference is included at the first use.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

**Table CO3: Responses submitted on Policy CO3 Community Facilities**

|     | <b>Id No / Ref</b> | <b>Name</b>         | <b>Organisation</b>        | <b>Policy/Topic</b> | <b>Summary of Comments</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----|--------------------|---------------------|----------------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 009 | OPP122             | Pauline Shearer     | Sport England              | Policy CO3          | Provision of recreation and leisure (likely to encompass sports provision) are included as community facilities. Policy needs to ensure that these are offered the same protection to be compatible with NPPF. The loss of sites for recreation and leisure would be supported by this policy if a-c is met which does not accord with NPPF. The provision of any new recreation and leisure facilities should be based on a needs assessment. Policy conflicts with NPPF paragraph 103. Several amendments are proposed including: additional requirement (3) relating to local needs; additional requirement (d) relating to replacement for loss; and identifying whether playing fields and other outdoor sports provision are included within the definition of 'community facilities' for recreation and leisure (if it is they require better policy protection'). See full representation for exact modifications requested. |
| 017 | OPP161             | Hyacinth Cabiles    | NHS Greater Manchester ICB | Policy CO3          | Support the inclusion of criterion (b) and supporting paragraph 18.38 as it enables the effective and timely redevelopment of existing health facilities where it has been formally declared surplus as part of wider estate strategy or transformation plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 018 | OPP249             | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy CO3          | Support the policy and note the strong conformity with policies 21 and 23 of the Saddleworth Neighbourhood Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 045 | OPP422             | Hyacinth Cabiles    | NHS Property Services Ltd  | Policy CO3          | Support the inclusion of criterion (b) and supporting paragraph 18.38 as it enables the effective and timely redevelopment of existing health facilities where it has been formally declared surplus as part of wider estate strategy or transformation plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

**Table CO4: Responses submitted on Policy CO4 Education and Skills**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------|------------|---------------------|----------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 009           | OPP123     | Pauline Shearer     | Sport England              | Policy CO4   | The loss of sites can include land and buildings used for recreation and leisure and the policy refers to the need to be considered under CO3. Concerned that this is insufficient protection and they need the same protection that NPPF sets out. Cross reference with CO1 required. Intent to promote shared use of facilities should be more explicit. Several amendments are proposed including: additional requirement relating to loss of sites and premises; and replacement of wording of second paragraph.<br>See full representation for exact modifications requested. |
| 018           | OPP250     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy CO4   | Support the policy and note the strong conformity with policy 14 of the Saddleworth Neighbourhood Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

**Table CO5: Responses submitted on Policy CO5 Securing Educational Places through New Residential Development**

| Respondent ID | Comment ID | Name         | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------|------------|--------------|--------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP142     | Chris Martin | Home Builders Federation | Policy CO5   | Agree that new development should mitigate its own impact. The PPG sets out that plan makers and the education authority need to work collaboratively to identify which schools are likely to expand and where new schools will be needed as a result of planned growth. It goes on to highlight that it is important that costs and land requirements for education provision are known to inform site typologies and site-specific viability assessments. It is therefore considered that the policy or reasoned justification could be more proactive in identifying where school expansion or new schools will be required in order to provide greater certainty for developers and for this to be better reflected in the Local Plan. This would ensure consistency with national policy. The Local Plan Viability Assessment makes a general allowance for an education contribution which is included in an overall S106 cost assumption |

| Respondent ID | Comment ID | Name                | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------|------------|---------------------|----------------------------------------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                     |                                                                |              | (£5,500 per plot). This appears to be derived from the per plot allowance used in the PfE DPD (£5,250 per plot) with an uplift included. It is unclear from this work as to the breakdown of this figure and how much specifically is for education and how this figure is derived. As such, consider the approach to education contributions is not justified and the policy is not effective. Further information is required on where school expansion is likely to be needed over the plan period and how the costs of this have fed into the Viability Assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 018           | OPP251     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                     | Policy CO5   | Support the policy and note the strong conformity with policy 14 of the Saddleworth Neighbourhood Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 022           | OPP281     | Matthew Broadbent   | Save Royton's Green Belt                                       | Policy CO5   | Whilst the policy provides a mechanism for securing developer contributions towards education provision, there is insufficient evidence to demonstrate that the scale of education demand arising from the Plan's housing requirement can be accommodated. The Council has supplied insufficient evidence to be able to formulate a conclusion in regard to the soundness of the policy; at worst, it does not know how many school places are available. Furthermore, there is no clear assessment of the realistic potential to expand existing schools, or the extent to which new school provision may be required. As a result, it is unclear whether the cumulative impact of development can be accommodated through the mechanisms set out in the policy, particularly in areas of significant growth. This raises concerns regarding the effectiveness and deliverability of the Plan. Whilst no modification wording is given, the response provides questions to be answered to conclude whether the policy is deliverable. |
| 025           | OPP311     | Cait O'Dowd         | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy CO5   | Support for this policy, where there is a proven need for additional education places.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

**Table CO6: Responses submitted on Policy CO6 New Development and Health**

| Respondent ID | Comment ID | Name             | Organisation               | Policy/Topic                                                         | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------|------------|------------------|----------------------------|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 017           | OPP162     | Hyacynth Cabiles | NHS Greater Manchester ICB | Policy CO6 - New Health Facilities                                   | <p>Welcome the inclusion for the need of new healthcare facilities to be determined by NHS bodies and strategies. To accurately reflect the structures which exist to plan for local healthcare infrastructure, reference to NHS Greater Manchester ICB should be included. Support the broad principle of co-location but urge the Council to consult NHS GM ICB to ensure the operational needs of primary healthcare facilities can be met in line with NHS standards and in considering the suitability of co-location with other community services.</p> <p>Proposed modification: "Proposals for new health facilities will be supported where they are:<br/>located in areas of identified need, as evidenced by the <u>NHS GM Integrated Care Partnership Board (or successor body)</u> – Oldham Locality and relevant NHS strategies; [...]"</p> |
| 017           | OPP163     | Hyacynth Cabiles | NHS Greater Manchester ICB | Policy CO6 - Loss of Existing Health Facilities                      | <p>The loss of a healthcare facility will be supported where it is formally declared surplus to the operational healthcare requirements of the NHS or as part of an estate's strategy or service transformation plan. Support the approach taken by the Council on the requirements to justify the loss of an existing health facility.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 017           | OPP164     | Hyacynth Cabiles | NHS Greater Manchester ICB | Policy CO6 - Impact of Residential Developments on Health Facilities | <p>Support the wider principle of ensuring the impacts on health infrastructure are sufficiently assessed and mitigated through seeking contributions for additional health infrastructure provision and would encourage the Council to engage with the ICB on a site-by-site basis. This would enable NHS GM ICB to accurately and suitable assess and determine where there is an identified need for primary care mitigation resulting from the impact of proposed new developments.</p>                                                                                                                                                                                                                                                                                                                                                               |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic                       | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|------------|---------------------|----------------------------|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 012           | OPP143     | Chris Martin        | Home Builders Federation   | Policy CO6                         | This policy seeks alignment with PfE Policy JP-P6 which outlines that a Health Impact Assessment (HIA) will be required for all developments screened for an Environmental Impact Assessment (EIA), 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. Given that a HIA is seen as a useful tool where impacts on health from a development proposal are anticipated to be 'significant' (see PPG), the Council's approach does appear to be pragmatic. However, to be effective, the policy should identify how those developments outside of those screened for EIA purposes will be assessed to establish whether a HIA is needed. Currently this is unclear and should be explained also with reference to the Integrated Assessment that accompanies the Local Plan which has already assessed health impacts (which would indicate that policy compliant schemes already address health issues). |
| 018           | OPP252     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy CO6                         | Support the policy and note the strong conformity with policy 14 of the Saddleworth Neighbourhood Plan. Particularly supportive of the application of the approach to health with regards to a potential new Saddleworth Health Centre, which we are strongly supportive of.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 045           | OPP423     | Hyacinth Cabiles    | NHS Property Services Ltd  | Policy CO6 - New Health Facilities | Welcome the inclusion for the need of new healthcare facilities to be determined by NHS bodies and strategies. To accurately reflect the structures which exist to plan for local healthcare infrastructure, reference to NHS Greater Manchester ICB should be included. Support the broad principle of co-location but urge the Council to consult NHS GM ICB to ensure the operational needs of primary healthcare facilities can be met in line with NHS standards and in considering the suitability of co-location with other community services. Proposed modification: "Proposals for new health facilities will be supported where they are: located in areas of identified need, as evidenced by the <u>NHS GM Integrated Care Partnership Board (or successor body)</u> – Oldham Locality and relevant NHS strategies; [...]"                                                                                                                                                                        |

| Respondent ID | Comment ID | Name             | Organisation              | Policy/Topic                                                         | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------|------------|------------------|---------------------------|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 045           | OPP424     | Hyacynth Cabiles | NHS Property Services Ltd | Policy CO6 - Loss of Existing Health Facilities                      | The loss of a healthcare facility will be supported where it is formally declared surplus to the operational healthcare requirements of the NHS or as part of an estate's strategy or service transformation plan. Support the approach taken by the Council on the requirements to justify the loss of an existing health facility                                                                                                                                                  |
| 045           | OPP425     | Hyacynth Cabiles | NHS Property Services Ltd | Policy CO6 - Impact of Residential Developments on Health Facilities | Support the wider principle of ensuring the impacts on health infrastructure are sufficiently assessed and mitigated through seeking contributions for additional health infrastructure provision and would encourage the Council to engage with the ICB on a site-by-site basis. This would enable NHS GM ICB to accurately and suitable assess and determine where there is an identified need for primary care mitigation resulting from the impact of proposed new developments. |

**Table CO7: Responses submitted on Policy CO7 Hot Food Takeaways and Fast-food Outlets**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------|------------|---------------------|----------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP253     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy CO7   | Tameside's Local Plan policy includes a specific restriction on percentage of the shop front that can be taken up by hot food takeaways and fast-food outlets. This policy refers to an "unacceptable concentration", but gives no indication of what that level is, which could result in a lack of clarity for planners, developers and residents. Would support the inclusion of clearer text on this to ensure the effectiveness of the policy.                                 |
| 041           | OPP400     | Liora Lederman      | British Land               | Policy CO7   | The policy and the relevant supporting text is unsound as it is not justified or effective. Part (2) of the policy prevents hot food takeaways and fast-food outlets within 400m of places where children and young people congregate, and paragraph 18.62 of the supporting text includes out-of-centre retail parks such as Elk Mill Retail Park within that definition. This effectively results in a blanket prohibition on fast-food and hot food takeaway uses across out-of- |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|------------|------|--------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |      |              |              | <p>centre retail parks, which is unjustified and disproportionate for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Out-of-centre retail parks are not places where children and young people generally seek to congregate. As an example, young people are more likely to congregate in Oldham Town Centre, which the policy exempts from the prohibition. The inclusion of retail parks within the definition is therefore inconsistent and, in our view, illogical.</li> <li>2. Elk Mill Retail Park is not in close proximity to any school; the nearest school is approximately 800m away. A key policy concern underpinning CO7 therefore does not apply here.</li> <li>3. Fast-food and hot food takeaway outlets are a common and established component of the retail offer at out-of-centre retail parks across the country, including at Elk Mill. A blanket ban on such uses at retail parks fails to reflect this commercial reality and is unduly onerous on shopping park owners and operators. It fails to acknowledge the economic benefits, including job creation, of this type of facility.</li> <li>4. Any concerns about the impact of a specific fast-food or hot food takeaway proposal can be addressed through the consideration of individual planning applications on their merits. A blanket policy prohibition on fast food outlets is not necessary or proportionate.</li> </ol> <p>Modification proposed, request that out-of-centre retail parks is removed from the definition of "places where children and young people congregate" in paragraph 18.62.</p> |



## 17. Responses submitted on the Protecting Our Local Environment Policies

Table LE1: Responses submitted on Policy LE1 Ensuring a High Standard of Amenity in New Development

| Respondent ID | Comment ID | Name            | Organisation     | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------|------------|-----------------|------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP84      | Andrew Leyssens | United Utilities | Policy LE1   | <p>Policy should refer to a wider range of amenity considerations such as odour and dust. Also request that it refers to any safety considerations such as hazardous operations at existing sites. This will ensure consistency with the 'agent of change' principle. This is requested due to the assets which United Utilities operate in the borough including wastewater assets that can generate noise, odour, attract flies and include hazardous operations. Proposed amendments as follows:</p> <p>"Policy LE1 – Ensuring a High Standard of Amenity <u>and Safety</u> in New Development</p> <p>All developments will be expected to provide and maintain a high standard of <u>amenity and safety (including but not limited to odour, noise, vibration, dust, hazardous installations / operations, etc)</u> <del>protection from noise pollution and vibration</del> for all users and occupiers, including both future occupants and users of the proposed development as well as existing occupants and users of neighbouring land and buildings. This should be achieved and maintained without preventing, or unreasonably restricting, the continued operation of established authorised neighbouring uses and activities.</p> <p>Proposals will be required to demonstrate, at planning application stage, that where applicable the following matters have been adequately addressed in relation to both the construction and operational life of the development:</p> |

|     |        |                     |                            |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----|--------|---------------------|----------------------------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |        |                     |                            |            | <p>1. noise and vibration (particularly with regards to noise-sensitive uses), including internal and external levels, timing, duration and character; <del>and</del></p> <p>2. traffic movements to, from and within, the site including car parking and arrangements for deliveries-; <u>and</u></p> <p>3. <u>any other relevant amenity / safety considerations.</u></p> <p>The Council will not support proposals where <del>new</del> residents and occupiers would be likely to raise complaints about neighbouring <del>existing</del> uses <u>(existing or proposed)</u> or where there are <u>safety concerns as a result of a hazardous installation or operation.</u> Where new developments could be affected by an existing operation or business in its vicinity, the applicant (or 'agent of change') is required to provide suitable mitigation to be agreed with the Council. Depending on the scale and nature of the development proposed, a detailed assessment to be agreed with the Council may be required to address criteria 1, <del>and-2</del> <u>and 3</u> above."</p> <p>Also suggest that paragraph 19.22 within the reasoned justification for Policy LE3, is moved to the reasoned justification associated with Policy LE1.</p> |
| 018 | OPP254 | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy LE1 | <p>The policy references noise and vibration and traffic movements. However, the title of the policy is "A High Standard of Amenity". Suggest that this policy may require revision to address the full breadth of amenity.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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

| Respondent ID | Comment ID | Name         | Organisation        | Policy/Topic | Summary of Comments                                                                                                                                                                      |
|---------------|------------|--------------|---------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 003           | OPP44      | Simon Tucker | Canal & River Trust | Policy LE2   | Welcomes the amendments to this policy especially where it refers to the provision of a land stability or slope stability risk assessment to address sites on potentially unstable land. |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------|------------|---------------------|----------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP85      | Andrew Leyssens     | United Utilities           | Policy LE2   | Requests the following additional wording to this policy: <u>"Proposals which are likely to result in contaminants entering formal surface or foul water drainage systems will not be permitted, without the express consent of the asset owner. Where consent of the asset owner is refused, applicants must demonstrate how contaminated water will be addressed at source in their remediation strategy."</u> Reflecting the importance of remediation strategies addressing contaminants, especially emerging contaminants such as PFAS, which should be treated at source and not transferred. |
| 018           | OPP255     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy LE2   | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 040           | OPP399     | Melanie Lindsley    | The Coal Authority         | Policy LE2   | The Coal Authority records indicate that within the Oldham area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. Support the policy.                                                                                                                                                                                                                                                                              |

**Table LE3: Responses submitted on Policy LE3 Air Quality**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                             |
|---------------|------------|---------------------|----------------------------|--------------|-----------------------------------------------------------------------------------------------------------------|
| 002           | OPP30      | Martyn Walker       | Lancashire Wildlife Trust  | Policy LE3   | Support.                                                                                                        |
| 018           | OPP256     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy LE3   | Support the policy and note the strong conformity with policy 29 of the Saddleworth Neighbourhood Plan with it. |

| Respondent ID | Comment ID | Name              | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------|------------|-------------------|--------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 022           | OPP282     | Matthew Broadbent | Save Royton's Green Belt | Policy LE3   | The policy as currently drafted allows developments to be assessed in isolation, meaning that incremental impacts in already constrained areas can be accepted even where there is clear evidence that cumulative development will lead to unacceptable air quality and congestion without mitigation. This undermines the effectiveness of the policy and is not consistent with the requirement to consider cumulative environmental effects. Many air quality assessments that form part of a planning application argue that the impact will be negligible and this is probably true in most cases, but if they come forward in an area where air quality is already poor - or worsening - then they will contribute cumulatively to a deteriorating situation. Several modifications proposed to policy including: additional wording for criteria 1; new criterion added regarding cumulative impacts; new paragraph regarding Air Quality Assessments; and a new paragraph regarding the delivery of transport or other mitigation infrastructure. |

## 17. Responses submitted on the Infrastructure and Delivery in Oldham Policies

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

The table below also includes general comments submitted in regard to infrastructure and delivery.

| Respondent ID | Comment ID | Name                | Organisation                   | Policy/Topic                                                                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------|------------|---------------------|--------------------------------|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP257     | Cllr Sam Al-Hamdani | Saddleworth Parish Council     | Chapter title                                                               | Suggest removing “in Oldham” from the title. This is the Local Plan for the borough, and this does not need to be there.                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 046           | OPP428     | Ivor Bolotkov       | SP Electricity North West      | General comments in relation to the provision of electrical infrastructure. | General comments submitted regarding the provision of existing distribution electrical infrastructure and forecasting future demand and future electrical infrastructure provision. Map showing electrical infrastructure in the borough provided as well as links to a number of their documents.                                                                                                                                                                                                                                                                  |
| 007           | OPP86      | Andrew Leyssens     | United Utilities               | Policy IN1                                                                  | Request the following wording is added to this policy: <u>“Proposals must be designed to minimise the impact on water resources and wastewater infrastructure.”</u> Suggested text for the reasoned justification also provided.                                                                                                                                                                                                                                                                                                                                    |
| 011           | OPP116     | Emily Hycran        | Historic England               | Policy IN1                                                                  | Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 015           | OPP152     | Natalie Belford     | Manchester Airport Group (MAG) | Policy IN1                                                                  | Welcome the amendments that have been made to the policy since comments were submitted on the Draft Local Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 012           | OPP144     | Chris Martin        | Home Builders Federation       | Policy IN1                                                                  | This policy sets out inter alia that all new residential developments should enable Fibre to the Premises (FTTP) broadband infrastructure. However, the requirement for broadband infrastructure for new residential developments is already set out in Part R of Building Regulations. The Government is clear that this is the standard which should be followed and there is no mechanism for going over and above this in the plan-making system. As such, this part of Policy IN1 is superfluous and in line with paragraph 16 of the NPPF, should be deleted. |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|------------|---------------------|----------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 018           | OPP258     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy IN1   | Support this policy and particularly note the contribution of this in Saddleworth towards home working, and where there are some locations particularly affected by poor access to superfast broadband. Note that the policy lists a number of elements that the telecommunications equipment should not have a detrimental impact on but does not mention impacts on human health and wildlife, drainage and sewerage. For the avoidance of doubt, this is not to give credence to some of the clearly disproven theories around the imagined impact of telecommunications equipment. However, we note that there is a small exclusion area around some masts for health and safety and would strongly support the inclusion of references to that in the policy, as well as to other potential impacts such as the that of foundations for masts on drainage and sewerage. |

**Table IN2: Responses submitted on Policy IN2 Planning Obligations**

| Respondent ID | Comment ID | Name            | Organisation     | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|------------|-----------------|------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 007           | OPP87      | Andrew Leyssens | United Utilities | Policy IN2   | To ensure that infrastructure is available to support new development, we request that new wording is added here that states: "Where developments would increase the need or demand for infrastructure, services and facilities, beyond the capacity of existing provision, new provision and/or contributions towards enhancing existing provision will be required. <u>It may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of new or improved infrastructure.</u> " |
| 009           | OPP124     | Pauline Shearer | Sport England    | Policy IN2   | Support the aim of seeking contributions for on-site or off-site facilities for sport however reasoned justification, paragraph 20.14 the words 'outdoor and indoor sports facilities' should be included. Could also refer to Sport England's facility calculators.                                                                                                                                                                                                                                                         |

| Respondent ID | Comment ID | Name             | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 017           | OPP165     | Hyacynth Cabiles | NHS Greater Manchester ICB | Policy IN2   | Support the requirement for securing the necessary contributions to ensure the timely delivery of required infrastructure and enable sustainable growth of new developments. To support this, we recommend the Council and applicants engage in early discussions with NHS GM ICB to assess the impact of new developments on existing primary healthcare service provision and to determine the most suitable form of mitigation to deliver the required primary healthcare infrastructure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 012           | OPP145     | Chris Martin     | Home Builders Federation   | Policy IN2   | NPPF is clear that plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the plan. The Local Plan Viability Assessment shows significant viability challenges in many parts of the borough, in particular showing development as unviable in Lower and Medium value areas on both greenfield and brownfield sites. Also have concerns regarding deliverability in some of the Higher value areas given that the assumptions for policy and S106 costs are opaque and it is difficult to see how these have been calculated. It is therefore difficult to see how the approach is justified. In light of this, concerned that the Council is restricting the circumstances where it is possible to submit a site-specific viability assessment when it would seem inappropriate not to accept site specific viability assessments on all sites (given the viability issues identified). Whilst it would clearly be preferable in the first instance that the Local Plan sets policy requirements that would not undermine the viability of development sites coming forward, it is clear that this is likely to be impractical and so a more flexible approach to site specific viability assessments is required so that the policy is effective and positively prepared. Where the policy does currently allow for site specific viability assessments to be submitted, it is on the basis that a clawback mechanism will be incorporated into the legal agreement. This is to ensure that additional mitigation is provided if final development viability is better than anticipated in the initial viability assessment. If this is the case, for effectiveness, the Council should |

| Respondent ID | Comment ID | Name                | Organisation                                                             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|               |            |                     |                                                                          |              | also include for allowing viability to be renegotiated where economic/market conditions have meant that the viability position has worsened. This will ensure the policy is appropriately balanced.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 018           | OPP433     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                               | Policy IN2   | Support the policy, and in particular, note the references in Policy 14 of the Saddleworth Neighbourhood Plan to specific areas for planning obligations to support as preference.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 023           | OPP286     | Natasha Styles      | The Planning Bureau on behalf of McCarthy and Stone and Churchill Living | Policy IN2   | <p>Policy IN2 requires a clawback mechanism to be incorporated into legal agreements where appropriate. In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability. A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism and detail within it that sits within a planning obligation needs to be considered and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. The plan currently does not do this.</p> <p>In addition, for a large or multi-phase development which will be delivered over a long period it makes sense to check whether a scheme's viability has changed with market movements. However, for a small single phased site, such as a much-needed older persons housing scheme that is built in one phase, the Inspectorate have repeatedly noted that review mechanisms are unnecessary. if a review mechanism is to be introduced the detail within any review mechanism needs be published so it can be fully assessed through the Local Plan process, this must also include an exemption for single phased schemes as repeatedly noted by the planning inspectorate. Request that the following wording should be incorporated into policy IN2:</p> <p><u>“• Single-phased development schemes will not be subject to a review mechanism.”</u></p> |



| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 025           | OPP312     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Policy IN2   | Support this policy, and the Beal Valley Broadbent Moss Masterplan and Design Code sets out how this can be achieved. That said, the level of supporting infrastructure – especially to the east of the Broadbent Moss allocation – to meet the PfE allocation policy objectives is such that public sector assistance is likely to be required. The approach set out in Policy IN2, which allows for the combining of Section 106 contributions, is supported. This provides an appropriate mechanism to ensure that financial contributions can be directed towards strategic infrastructure projects that support the delivery of the allocation as a whole, including transport improvements, education provision, green infrastructure and community facilities. It is also important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability. Policy IN2 confirms that, where justified, a site-specific viability assessment may be submitted where there has been a material change in circumstances that was not evident at the time of the whole plan viability assessment, in accordance with NPPF and PPG. Where such assessments demonstrate that it is not financially viable to deliver the full extent of planning obligations, the policy allows for reduced obligations to be considered, subject to appropriate safeguards. These include ensuring that the value of planning obligations has been maximised having regard to viability. Support this. The inclusion however of clawback mechanisms will not always be appropriate so welcome that this will only be sought 'where appropriate'. |
| 026           | OPP325     | Cait O'Dowd | Ashton Hale on behalf of Saddleworth Property Partnership      | Policy IN2   | It is important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 028           | OPP334     | Cait O'Dowd | Ashton Hale on behalf of                                       | Policy IN2   | Support this policy and the Beal Valley Broadbent Moss Masterplan and Design Code sets out how this can be achieved. It is also important that the policy recognises the need for flexibility in the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Respondent ID | Comment ID | Name        | Organisation                                                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|               |            |             | Grasscroft de Greenfield Ltd                                                              |              | application of planning obligations, particularly in relation to viability. The policy allows for reduced obligations to be considered, subject to appropriate safeguards, based on the outcomes of a site-specific viability assessment. These include ensuring that the value of planning obligations has been maximised having regard to viability. Support this. The inclusion however of clawback mechanisms will not always be appropriate and so welcome that this will only be sought 'where appropriate'.                                                                               |
| 029           | OPP343     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd                                     | Policy IN2   | It is important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability. The policy allows for reduced obligations to be considered, subject to appropriate safeguards, based on the outcomes of a site-specific viability assessment. These include ensuring that the value of planning obligations has been maximised having regard to viability, which is supported. The inclusion however of clawback mechanisms will not always be appropriate, so welcome that this will only be sought 'where appropriate'. |
| 030           | OPP355     | Cait O'Dowd | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Policy IN2   | It is important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability.                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 031           | OPP366     | Cait O'Dowd | Ashton Hale on behalf of Prestigious Homes North West                                     | Policy IN2   | It is important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability.                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 032           | OPP377     | Cait O'Dowd | Ashton Hale on behalf of Andy Hulme                                                       | Policy IN2   | It is important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability.                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Respondent ID | Comment ID | Name           | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 042           | OPP411     | Michael Parham | Lichfields on behalf of Russell LDP | Policy IN2   | <p>The policy should include text to confirm that obligations will align with the tests in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. The Viability Assessment found viability to be difficult in Oldham. This is largely due to high build costs and low sales values across the borough which also impacts employment development Sites. This has particular implications for employment development and strategic allocations such as JPA2 'Stakehill'. PfE already establishes an Infrastructure Delivery Plan for strategic allocations, including Stakehill, and that this provides a mechanism for identifying and coordinating infrastructure requirements. In this context, Policy IN2 should not seek to duplicate or restate these requirements. However, the current drafting of Policy IN2 lacks clarity as to how local infrastructure requirements and planning obligations will be applied alongside the PfE framework. The policy does not clearly articulate how contributions will be determined, or how any additional local policy burdens will be balanced against viability considerations. Any local infrastructure requirements should ensure they align with the existing requirements of PfE and ensure all requirements are properly tested through a viability assessment so that the expected contributions are appropriately evidenced. The Viability Assessment has not considered the impacts of draft Policy IN2 on strategic non-residential allocations which are allocated through PfE. Therefore, no evidence has been presented to demonstrate that the contributions sought by the policy have been sufficiently evidenced for PfE allocated employment sites.</p> <p>Recommends that the three tests in relation to planning obligations, as set out in paragraph 58 of the NPPF, are referenced in the wording of Policy. The policy should be revisited to ensure that the infrastructure requirements for strategic allocations have been properly tested and evidenced in a viability assessment, alongside any local requirements expected</p> |

| Respondent ID | Comment ID | Name             | Organisation              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 045           | OPP426     | Hyacynth Cabiles | NHS Property Services Ltd | Policy IN2   | Support the requirement for securing the necessary contributions to ensure the timely delivery of required infrastructure and enable sustainable growth of new developments. To support this, we recommend the Council and applicants engage in early discussions with NHS GM ICB to assess the impact of new developments on existing primary healthcare service provision and to determine the most suitable form of mitigation to deliver the required primary healthcare infrastructure. |

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

| Respondent ID | Comment ID | Name            | Organisation             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 009           | OPP125     | Pauline Shearer | Sport England            | Policy IN3   | Support the aim of maximising social value from development. Social value calculators are important for community sport and physical activity. Sport England Guidance on this provided.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 012           | OPP146     | Chris Martin    | Home Builders Federation | Policy IN3   | Many residential developments will bring with them social benefits, through the provision of new more sustainable homes and potentially through the provision of affordable homes and other infrastructure provided through planning obligations. Quotes a report on the economic footprint of House Building. In line with paragraph 45 of NPPF, 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, over and above the general benefits associated with development as set out above. Also question the need for the measures in the Social Value Strategy to be conditioned on any planning permission granted. Whilst the criteria in the policy are generally understood, they are inherently subjective in nature and so it is unclear what would specifically need to be achieved so as to discharge the planning |

| Respondent ID | Comment ID | Name                | Organisation                                                             | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|               |            |                     |                                                                          |              | condition. The Council also needs to explain this in further detail and ensure the requirements are appropriately accounted for in the Viability Assessment as this is not currently clear. As such, the policy is not justified, effective or consistent with national policy and should be deleted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 018           | OPP259     | Cllr Sam Al-Hamdani | Saddleworth Parish Council                                               | Policy IN3   | Support the policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 023           | OPP287     | Natasha Styles      | The Planning Bureau on behalf of McCarthy and Stone and Churchill Living | Policy IN3   | Much needed older Persons' Housing produces a large number of significant benefits which supports local residents and vulnerable older people and can help to reduce the demands on Health and Social Services and other care services, which greatly adds to social value and inclusion. In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Given the above and the large need for older persons housing in Oldham, an exemption should be provided to older persons housing scheme to having to provide a social value strategy. It is recommended that for the plan to be in line with national policy and effective additional wording should be added to para 2 of the policy to recognise the health benefits of older persons housing. Modification proposed to add the following wording to paragraph 2 of the policy: <u>"Specialist Housing for older people has a number of social benefits and proposals for such schemes will not be required to submit a Social Value Strategy."</u> |

## 18. Responses submitted on the Monitoring Chapter

**Table M1: Responses submitted on Policy M1 Monitoring Framework**

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 002           | OPP31      | Martyn Walker       | Lancashire Wildlife Trust  | Policy M1    | Monitoring of S106 agreements, conservation covenants and conditions attached to BNG deliver will be essential in assessing the effectiveness of the Local Plan. Resources must be made available to ensure that there are effective policing and enforcement of the agreements/conditions where required. Monitoring and enforcement of planning conditions will play a vital part in ensuring the success of the plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 012           | OPP147     | Chris Martin        | Home Builders Federation   | Policy M1    | The Monitoring Framework of the Local Plan provides a selection of indicators and monitoring targets to monitor the performance of the policies. There is also a Local Plan Monitoring Indicators table associated with Policy M1 (Table M1). Table M1 itself seeks to monitor indicators against the Integrated Assessment objectives rather than specifically the policies of the Local Plan. It is therefore unclear on what basis the Local Plan is being monitored. For monitoring to be effective, this requires clarity from the Council. Irrespective of this, the Monitoring Framework also needs to be more precise in terms of data sources for the indicators identified and needs to be more definitive in terms of actions; identifying when, why and how actions will be taken to address any issues identified. Currently, Policy M1 is vague in terms of actions which are imprecise and heavily caveated (using 'may' instead of 'will'). This requires further explanation to ensure effectiveness and to allow the plan to be positively prepared. |
| 018           | OPP260     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Policy IM1   | Support the policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

## 19. Responses submitted – Plan Wide Overarching Comments

Table O1: Plan Wide Overarching Responses submitted

| Respondent ID | Comment ID | Name             | Organisation                             | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 006           | OPP61      | Gareth Salthouse | Emery Planning - on behalf Mr J Jaskolka | Plan period                 | The plan-period for the Local Plan should run until 2042 as a minimum i.e. the minimum 15-year period. Suggest that it extends beyond 2042 in order to allow for slippage as Local Plan examination have historically taken multiple years. No known sound reason for the plan-period extending until 2039 only.                                                                                                                                            |
| 007           | OPP62      | Andrew Leyssens  | United Utilities                         | Removal of site allocations | Would prefer to see specific allocations identified as part of a new Local Plan in preference to a reliance on windfall sites as it helps add certainty for infrastructure providers and allow for any site-specific issues or constraints to be identified.                                                                                                                                                                                                |
| 008           | OPP89      | Stuart Beesley   | Individual                               | Whole Document              | Comments that the documents are voluminous and that for someone who is working and has a partner and children it must be extremely difficult to find the time for them to read through these documents and then make constructive comments in response. Asks if the Twentieth Century Society has been consulted on the Councils intention to demolish the buildings on the Civic Centre Site.                                                              |
| 005           | OPP51      | David John Moore | Individual                               | Whole Document              | The Plan should be reduced in content, simplified and advertised/publicised what it is about. The Oldham Town Centre part is out of date and should focus on bringing in shops, businesses, restaurants etc to the town centre to generate money and spending. Also, the Metrolink should also be rerouted through the centre of Oldham. The Plan also discusses building Affordable Homes but does not reflect the infrastructure that should be provided. |
| 011           | OPP91      | Emily Hycran     | Historic England                         | Whole Document              | Support the content of the Publication version of the Oldham Local Plan. The plan sets out a positive strategy for the conservation and enhancement of the historic environment as required by the NPPF. The plan includes policies which will sustain and enhance the significance of the borough's heritage assets. Historic England has worked with Oldham Council on an ongoing basis throughout the                                                    |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic   | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|               |            |                     |                            |                | preparation of the Plan. Welcome the opportunities the Council provided at all stages of the Plan to comment and provide advice on the Plan. The Council's positive approach to the historic environment and their active engagement with Historic England, has resulted in a Plan which we support and, consider to be sound in terms of the requirements of the NPPF and the historic environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 012           | OPP128     | Chris Martin        | Home Builders Federation   | Plan period    | The approach to the plan period is not considered to be sound as it is not positively prepared, not effective and not consistent with national policy for the following reasons: according to the LDS the plan will only cover 11 years (should adoption be Spring 2027), which is significantly shorter than the 15 years required by NPPF. The HBF considers a plan period from adoption of 11 years is inadequate to allow for certainty and confidence for developers to invest in the borough and for the plan to achieve its Vision and Objectives. It also hampers longer term strategic change for the area. PfE specifically mentions that the constituent authorities will need to extend their plan period beyond this (see PfE paragraph 1.56). As such, the Council as minimum should extend the plan period to at least 2042 to comply with NPPF. |
| 018           | OPP167     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Whole Document | Commend the positive intent of the Oldham Local Plan and, in particular, its positive stance on improving the environment of the borough, working towards employment opportunities, and improving public transport connections throughout.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 018           | OPP168     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Whole Document | Documents referred to in the text are highlighted in blue and underlined. However, they are not the actual links, which are contained in the footnotes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 018           | OPP169     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Whole Document | Throughout the plan, references are made to "Oldham". It is unclear as to whether the plan is referring to the borough or to the town. Request that every instance should be explicit in referring to one or the other.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |



| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic   | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| 018           | OPP170     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Whole Document | Each page of the Local Plan has the strapline "The Local Plan must be read as whole and together with PfE". It is not simply a case of reading the Plan with PfE, request that this is changed to "The Local Plan must be read as a whole and in conjunction with other relevant planning documents including the NPPF, PfE, and relevant Neighbourhood Plans."                                                                                  |
| 018           | OPP171     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Whole Document | Concerns about the way that the Local Plan often treats the borough as a more singular area than is the case. This is a borough of great diversity and contrasts. Great care is needed to ensure that universal statements are not made that would not apply to the whole borough.                                                                                                                                                               |
| 018           | OPP172     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Whole Document | Acronyms and abbreviations are often used without definition, for example, GVA, BREEAM and CAVAT. Each should be defined in the first instance and then used consistently. Would also be helpful for them to be added consistently to the glossary.                                                                                                                                                                                              |
| 018           | OPP430     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Whole Document | The document has an extensive focus on Oldham Town Centre, which is one of several town centres in the borough. There is a full chapter exclusively on Oldham Town Centre. There is very little content on rural centres.                                                                                                                                                                                                                        |
| 018           | OPP173     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Whole Document | The policies map is not consistently coordinated with the policies contained within the plan as a whole. There is an issue where different areas on the map overlap with each other, which in many cases makes it impossible to use on a practical level. Suggest there should be individual policy maps for each item (or in some cases related groups of items) in the key, and a clear indication of which policies are relevant to that map. |

| Respondent ID | Comment ID | Name                | Organisation               | Policy/Topic   | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 018           | OPP174     | Cllr Sam Al-Hamdani | Saddleworth Parish Council | Appendices     | <p>Many of the appendix maps lack the detail to make them usable. Recommend that: Appendices 2 and 9 have clearer identifying information in each map, and the titles for each map to include a specific location name, not just a number reference.</p> <p>Appendices 3, 4, 6 and 11 be amended to have clearer identifying information in each map.</p> <p>Appendices 5 and 7 be amended to have clearer identifying information in each map, and to have large scale versions of the specific locations, not just their general location.</p> <p>Appendix 10 should include maps of the SBIs, or if this cannot be done, a reference to where the maps can be found. It should also include a definition of what the gradings included in the document mean.</p>                                                                                                                                                                                                                                                           |
| 012           | OPP191     | Chris Martin        | Home Builders Federation   | Whole Document | <p>It would be helpful if the Council could include clause/paragraph numbers within all of the policies. The numbering of each clause/paragraph within a policy will aid referencing for those making representations to the Local Plan as well as for applicants and decision makers following the adoption of the plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 012           | OPP192     | Chris Martin        | Home Builders Federation   | Whole Document | <p>It is clear that the Council is intending to use the transitional arrangements and submit its Local Plan for examination under the current plan-making regime. On this basis, paragraphs 4 and 8 in Annex A of the draft NPPF outline that the Local Plan will then be examined under the current NPPF (December 2024). However, it is also notable that in relation to decision making, Annex A also states that from the date the new NPPF is published, Local Plan policies that are "...any way inconsistent with national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework". Consequently, if the emerging NPPF comes forward in its current guise, the Council may need to have regard to national policies for decision making, given that any inconsistency may effectively render policies in the Local Plan that are not consistent with the new NPPF redundant as soon as the Local Plan is adopted.</p> |

| Respondent ID | Comment ID | Name          | Organisation                                                   | Policy/Topic   | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 019           | OPP261     | Alan Chorlton | Chorlton Planning Ltd                                          | Whole Document | The tourism industry in Oldham and in particular Saddleworth brings a lot of income to the towns and villages. The tourism industry is growing, and the Plan should give more weight to this. There is a need for more high-quality visitor accommodation. This should not be limited to the urban areas and villages. A policy to encourage more high-quality limited tourist accommodation in rural areas outside the built-up areas would assist this                                                                                                                                                                                                                                                                                                                                                                                                           |
| 025           | OPP294     | Cait O'Dowd   | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Whole Document | Support the Publication Plan's objective of delivering sustainable growth and creating high quality new communities. The Local Plan could provide clearer support for the delivery of strategic allocations identified through PfE, recognising their important role in meeting the borough's housing and employment requirements. The Local Plan should also benefit from recognising the role of the Draft Beal Valley and Broadbent Moss Masterplan and Spatial Design Code, which has been endorsed by the Council, in guiding the design and delivery of development across these strategic allocations. Subject to the comments outlined within these representations, consider that the Publication Local Plan can provide an effective framework for delivering sustainable growth in Oldham and supporting the delivery of the PfE strategic allocations. |

| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic                                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------|------------|-------------|----------------------------------------------------------------|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 015           | OPP313     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Whole Document                              | <p>The spatial strategy of the Publication Plan is justified as it aligns with the strategy established through PfE, which has been subject to extensive evidence base analysis and independent examination prior to its adoption. Strategic allocations such as Beal Valley and Broadbent Moss were identified through a comprehensive site selection process and were tested through the PfE examination process. These allocations therefore represent appropriate, sustainable and justified locations for accommodating growth within Oldham.</p> <p>The Publication Local Plan relies significantly on the already tested PfE. Its policies set out how PfE requirements can be achieved over the Plan period. While some development will likely extend beyond the Plan period, the consortium considers it to be effective. The Publication Plan aligns with national policy objectives set out in the NPPF, including the need to significantly boost the supply of homes, support sustainable economic growth and promote high quality design. The Plan should ensure that its policies support the efficient use of land and allow appropriate flexibility in the application of density, housing mix and affordable housing requirements where this is necessary to maintain the viability and deliverability of development. Ensuring that the Plan supports the implementation of the PfE strategic allocations will also help ensure consistency with national policy objectives relating to sustainable development.</p> |
| 026           | OPP315     | Cait O'Dowd | Ashton Hale on behalf of Saddleworth Property Partnership      | Plan wide/<br>housing requirement/<br>BEA21 | <p>The Publication Plan's reliance on an outdated housing requirement, derived from the 2021 NPPF and PfE, further reinforces the importance of identifying additional deliverable housing sites.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Respondent ID | Comment ID | Name        | Organisation                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|------------|-------------|-----------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 016           | OPP326     | Cait O'Dowd | Ashton Hale on behalf of Saddleworth Property Partnership | Plan wide    | <p>The Plan is not positively prepared because it fails to fully respond to the most up to date evidence and national policy context relying on an outdated housing requirement, derived from the 2021 NPPF which means that the Plan does not fully account for the Government's most recent standard method for calculating housing need (December 2024 NPPF). This raises concerns that the Plan may not meet objectively assessed needs over the plan period. Also, the failure to recognise sustainable, deliverable brownfield opportunities such as Saddleworth Business Centre (SBC) undermines the Plan's ability to maximise housing delivery in accordance with national policy. The Plan should be more flexible and responsive in bringing forward such sites, particularly where they are well-located and unconstrained. The continued allocation of SBC for employment use conflicts with principles of the NPPF in that, the Plan does not promote the effective use of land and the provision of sustainable housing within this location. While the Publication Plan has been prepared with reference to the 2021 NPPF, the conclusions regarding its consistency with national policy remain materially unchanged when assessed against the 2024 version.</p> |

| Respondent ID | Comment ID | Name        | Organisation                                          | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------|------------|-------------|-------------------------------------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 028           | OPP335     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd | Plan wide    | <p>Content the Publication Local Plan is positively prepared in that it seeks to deliver the housing and employment growth identified through the adopted PfE. The Plan could be bolstered by explicitly identifying and supporting categorically the delivery of strategic allocations identified through PfE, including Beal Valley.</p> <p>The spatial strategy of the Publication Plan is justified as it aligns with the strategy established through PfE, which has been subject to extensive evidence base analysis and independent examination prior to its adoption. The Beal Valley allocation represents an appropriate, sustainable and justified location for accommodating growth within Oldham. The Publication Local Plan relies significantly on the already tested PfE. Its policies set out how PfE requirements can be achieved over the Plan period. While some development will likely extend beyond the Plan period, GdeG considers it to be effective. The Plan is consistent with NPPF. The Plan should ensure that its policies support the efficient use of land and allow appropriate flexibility in the application of density, housing mix and affordable housing requirements where this is necessary to maintain the viability and deliverability of development. Ensuring that the Plan supports the implementation of the PfE strategic allocations will also help ensure consistency with national policy objectives relating to sustainable development.</p> |

| Respondent ID | Comment ID | Name        | Organisation                                                                              | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------|------------|-------------|-------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 029           | OPP344     | Cait O'Dowd | Ashton Hale on behalf of Grasscroft de Greenfield Ltd                                     | Plan wide    | Content the Publication Local Plan is positively prepared in that it seeks to deliver the housing and employment growth identified through the adopted PfE. The Council could have taken a more proactive approach by identifying additional housing sites at this stage rather than relying on an early review of the Local Plan, which risk the Council being unable to demonstrate a deliverable 5-year housing land supply. The spatial strategy of the Publication Plan is justified as it aligns with the strategy established through PfE, which has been subject to extensive evidence base analysis and independent examination prior to its adoption. The Publication Local Plan relies significantly on the already tested PfE. Its policies set out how PfE requirements can be achieved over the Plan period. While some development will likely extend beyond the Plan period, GdeG considers it to be effective. The Plan is consistent with NPPF. The Plan should ensure that its policies support the efficient use of land and allow appropriate flexibility in the application of density, housing mix and affordable housing requirements where this is necessary to maintain the viability and deliverability of development. Ensuring that the Plan supports the implementation of the PfE strategic allocations will also help ensure consistency with national policy objectives relating to sustainable development. |
| 030           | OPP347     | Cait O'Dowd | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Plan wide    | The Publication Plan fails to maximise the contribution of suitable brownfield land, relies on evidence that is not up to date, and does not provide a justified or effective strategy for the site                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Respondent ID | Comment ID | Name        | Organisation                                                                              | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 030           | OPP356     | Cait O'Dowd | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Plan wide                   | The Plan fails to fully respond to the most up to date evidence and national policy context. In particular, the reliance on an outdated housing requirement, derived from the 2021 NPPF, means that the Plan does not fully account for the Government's most recent standard method for calculating housing need (December 2024 NPPF). This raises concerns that the Plan may not meet objectively assessed needs over the plan period. The failure to recognise sustainable, deliverable brownfield opportunities such as Bee Mill undermines the Plan's ability to maximise housing delivery in accordance with national policy. The Plan should be more flexible and responsive in bringing forward such sites, particularly where they are well located and unconstrained. As such, the Plan is not positively prepared in respect of Bee Mill. While the Publication Plan has been prepared with reference to the 2021 NPPF, the conclusions regarding its consistency with national policy remain materially unchanged when assessed against the 2024 version. |
| 031           | OPP357     | Cait O'Dowd | Ashton Hale on behalf of Prestigious Homes North West                                     | Plan wide                   | The Plan relies on housing requirements derived from the PfE framework however, the updated December 2024 Framework introduces a revised standard method which is likely to increase housing need across Oldham. As such, the current strategy risks under delivering against future requirements. The Local Plan, as currently drafted, fails to take a proactive approach to identifying deliverable housing sites. As a result, it is not sound.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 031           | OPP367     | Cait O'Dowd | Ashton Hale on behalf of Prestigious Homes North West                                     | Plan wide/ Site allocations | Comments submitted in the context of submitting a site for development, 'Birks Quarry'. The reliance on housing figures derived from PfE and the 2021 Framework does not reflect the revised standard method introduced in December 2024. This is likely to result in a higher housing requirement across the borough. The omission of sustainable, deliverable sites, such as those promoted by Prestigious Homes, limits the Council's ability to respond to this increased need. A positively prepared plan should identify a sufficient supply of deliverable and developable land, including appropriate Green Belt releases where necessary. The                                                                                                                                                                                                                                                                                                                                                                                                                |



| Respondent ID | Comment ID | Name        | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|               |            |             |                                     |              | Plan is not justified because it has not been demonstrated that the strategy represents the most appropriate approach when considered against reasonable alternatives. This is especially relevant in the case of Birks Quarry, where the principle of residential development has already been established through planning permissions. The Plan is not considered effective because there is insufficient certainty that housing delivery will be achieved over the plan period. Evidence within the Council's own documentation suggests that delivery in later years of the Plan will increasingly rely on uncertain sources of supply, including strategic allocations and sites that have previously stalled. The Plan is not fully consistent with national policy, in relation to boosting the supply of homes, effective use of land and ensuring plans remain responsive to changing circumstances, and also in relation to reviewing Green Belt boundaries where necessary and the potential role of Grey Belt land in meeting development needs. The continued exclusion of sustainable and deliverable sites that could contribute to housing supply conflicts with these objectives. In particular, where sites represent contained or previously developed land and make a limited contribution to the purposes of the Green Belt, their release should be properly considered as part of the plan making process. |
| 032           | OPP368     | Cait O'Dowd | Ashton Hale on behalf of Andy Hulme | Plan wide    | The Plan relies on housing requirements derived from the PfE framework however, the updated December 2024 Framework introduces a revised standard method which is likely to increase housing need across Oldham. As such, the current strategy risks under delivering against future requirements. The Local Plan, as currently drafted, fails to take a proactive approach to identifying deliverable housing sites. As a result, it is not sound.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 032           | OPP378     | Cait O'Dowd | Ashton Hale on behalf of Andy Hulme | Plan wide    | The reliance on housing figures derived from PfE and the 2021 Framework does not reflect the revised standard method introduced in December 2024. This is likely to result in a higher housing requirement across the borough. The omission of sustainable, deliverable sites, such as those promoted in this document, limits                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Respondent ID | Comment ID | Name           | Organisation  | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------|------------|----------------|---------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                |               |              | <p>the Council's ability to respond to this increased need. A positively prepared plan should identify a sufficient supply of deliverable and developable land, including appropriate Green Belt releases where necessary.</p> <p>The Plan is not justified because it has not been demonstrated that the strategy represents the most appropriate approach when considered against reasonable alternatives. The promoted sites are well related to existing settlements, located in sustainable locations and capable of being developed in a manner that would contribute positively to the borough's housing supply. The Plan is not considered effective because there is insufficient certainty that housing delivery will be achieved over the plan period. Evidence within the Council's own documentation suggests that delivery in later years of the Plan will increasingly rely on uncertain sources of supply, including strategic allocations and sites that have previously stalled. The Plan is not fully consistent with national policy, in relation to boosting the supply of homes, effective use of land and ensuring plans remain responsive to changing circumstances, and also in relation to reviewing Green Belt boundaries where necessary and the potential role of Grey Belt land in meeting development needs. The continued exclusion of sustainable and deliverable sites that could contribute to housing supply conflicts with these objectives. In particular, where sites represent contained or previously developed land and make a limited contribution to the purposes of the Green Belt, their release should be properly considered as part of the plan making process.</p> |
| 033           | OPP379     | Michael Parham | Taylor Wimpey | Plan period  | <p>Paragraph 2.4 of the Oldham Local Plan sets out that the plan period aligns with that of the PfE to 2039. Whilst it is noted that the PfE plan period does run to 2039, the Inspectors' Report explicitly states that the constituent authorities will need to extend their plan period beyond this (see PfE paragraph 1.56) and ensure a minimum Local Plan period of 15 years post adoption. As such, Oldham Council needs to extend the plan period to at least 2042 in light of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Respondent ID | Comment ID | Name          | Organisation                         | Policy/Topic                | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|               |            |               |                                      |                             | this or risk being in conflict with the requirements of the PfE. This will also ensure compliance with national policy, namely paragraph 22 of the NPPF.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 035           | OPP390     | Alexis De Pol | Depol on behalf of Rowland Homes Ltd | Plan wide/ site allocations | It is considered that the Plan is not based on realistic assumptions regarding site availability and development viability and that the Council have failed to provide a robust evidential basis to justify the Policy H1 strategy of relying on just the PfE allocations and windfall sites to deliver the minimum PfE housing requirement. The Council has not demonstrated why a strategy based on allocating additional specific sites was not pursued, especially given the lack of clear evidence in the SHLAA that the strategy of windfall reliance will be able to deliver the minimum requirement over the plan period or enable the Council to maintain a deliverable 5YHS. It is not considered to be positively prepared, justified, effective or consistent with national policy as a result. For reasons set out in this statement the Council's SHLAA is unable to robustly and clearly identify sufficient suitable, available and deliverable land to meet the minimum housing requirement and thus further Green Belt release is considered necessary and justified as part of the OLP. If further Green Belt release is to be considered the following site to the south of Old Thornham Road on the northern edge of Royton would be appropriate for housing allocation (site details provided in response). |
| 037           | OPP393     | Steve Stayce  | Environment Agency                   | Plan wide                   | General support. Having reviewed the plan and its evidence base, including the in-house produced Strategic Flood Risk Assessment, Update for Oldham Local Plan – Publication Plan (January 2026) and relevant policies, with regards to matters within our remit only, we consider the Local Plan to be: Sound, in that it is positively prepared, justified, effective, and consistent with national policy; Legally compliant In accordance with the Duty to Cooperate. Further comments provided to strengthen the clarity and robustness of the Strategic Flood Risk Assessment and associated wording within the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Respondent ID | Comment ID | Name               | Organisation                        | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|------------|--------------------|-------------------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |            |                    |                                     |              | plan. These suggestions do not affect our overall conclusion regarding compliance, soundness and Duty to Cooperate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 039           | OPP398     | Elizabeth Gartside | Individual                          | Windfarms    | The plan is bad for Royton and wind farms should be the top of existing buildings like car parks, skyscrapers and other buildings, not green belt.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 042           | OPP401     | Michael Parham     | Lichfields on behalf of Russell LDP | Plan period  | Whilst it is noted that the PfE plan period does run to 2039, the Inspectors' Report explicitly states that the constituent authorities will need to extend their plan period beyond this (see PfE paragraph 1.56) and ensure a minimum Local Plan period of 15 years post adoption. As such, Oldham Council needs to extend the plan period to at least 2042 in light of this or risk being in conflict with the requirements of the PfE. This will also ensure compliance with national policy, namely paragraph 22 of the NPPF.                                                                                                                                                                                    |
| 043           | OPP412     | Sebastian Tibenham | Pegasus Group on behalf of DWFCO    | Plan period  | The Local Plan covers a period of 2022 to 2039. NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. Noted that PfE provides a plan period up to 2039, but it specifically mentions that the constituent authorities will need to extend their plan period beyond this. As a minimum, the plan period should therefore be extended to at least 2042 to ensure compliance with national policy and consistency with the requirements of the PfE. |

## 20. Responses submitted on Supporting Documents

**Table SD1: Responses submitted on the Habitat Regulations Assessment (HRA)**

| Respondent ID | Comment ID | Name        | Organisation    | Policy/Topic                            | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|------------|-------------|-----------------|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 004           | OPP48      | Matt Browne | Natural England | HRA (2 - Brief description of the Plan) | This section of the HRA should summarise what components of the Local Plan go beyond those within PfE.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 004           | OPP49      | Matt Browne | Natural England | HRA (6 - Initial Screening Opinion)     | Suggests the inclusion of additional explanatory text to support the screening decision in Table 6.1. Also where there is likely significant effect (LSE) alone, these policies need to be taken to Appropriate Assessment (AA) alone. Where there is no LSE alone, these policies need to be assessed in combination with other plans or projects to establish if, together, they result in an LSE that needs to be considered at AA. This in-combination assessment of LSE ruled out alone should come before the AA.                                                                                                                                                                                                                                                                                        |
| 004           | OPP50      | Matt Browne | Natural England | HRA (7 - Appropriate Assessment)        | Suggested that wording referring to LSE instead of an adverse effect on integrity (AEOI) should be corrected on European designated sites and if there is sufficient evidence to rule out an AEOI this should be stated in the AA. The AA should also consider the impacts on:<br>The extent and distribution of qualifying habitats and species,<br>The abundance and spatial distribution of qualifying species or assemblages,<br>The structure of the qualifying habitat, which should not be affected in terms of abundance and diversity,<br>The physical, chemical and biological processes that support the qualifying habitat to ensure these are not affected.<br>The AA should seek mitigation measures that are capable of implementation and will reduce the impact to the lowest level possible. |

**Table SD2: Responses submitted on the Infrastructure Delivery Plan**

| Respondent ID | Comment ID | Name             | Organisation               | Policy/Topic                 | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|------------|------------------|----------------------------|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 017           | OPP166     | Hyacinth Cabiles | NHS Greater Manchester ICB | Infrastructure Delivery Plan | Welcome the inclusion of a section on health infrastructure and note the Council recognises the need to collaboratively work with both the NHS GM ICB and NHSPS to ensure the appropriate health infrastructure is delivered in line with anticipated housing growth. Would welcome further engagement with the Council to add further detail to the approach regarding primary healthcare provision to ensure that the assessment of existing healthcare infrastructure is robust, and the mitigation options secured align with NHS requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 024           | OPP293     | Adam Johnson     | National Highways          | Infrastructure Delivery Plan | The IDP aligns with the adopted PfE and the Greater Manchester Transport Strategy 2040 and identifies key junction improvements where joint working with National Highways and TfGM will be required. TfGM have recently consulted on a new Draft Greater Manchester Transport Strategy and Delivery Plan (2027-2037). Therefore, the transport evidence is expected to be updated to align to this plan once the 2050 Strategy has been formally adopted. Following this adoption, the IDP will require revisiting to formally assess if it satisfies the needs of infrastructure requirements, funding mechanisms and delivery timescales over the Local Plan period. Notwithstanding, the IDP does not provide scheme-level detail or detailed transport assessment, which is appropriate at this stage of plan-making. Detailed assessment of impacts on the SRN, including the scope, timing and delivery of mitigation measures, should be considered at planning application stage of each development plot, though in line with the Circular at paragraph 29. |
| 045           | OPP427     | Hyacinth Cabiles | NHS Property Services Ltd  | Infrastructure Delivery Plan | Welcome the inclusion of a section on health infrastructure and note the Council recognises the need to collaboratively work with both the NHS GM ICB and NHSPS to ensure the appropriate health infrastructure is delivered in line with anticipated housing growth. Would welcome further engagement with the Council to add further detail to the approach regarding primary healthcare provision to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|  |  |  |  |  | ensure that the assessment of existing healthcare infrastructure is robust, and the mitigation options secured align with NHS requirements. |
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**Table SD3: Responses submitted on the Topic Papers**

| Respondent ID | Comment ID | Name         | Organisation      | Policy/Topic                                 | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| 024           | OPP292     | Adam Johnson | National Highways | Transport / Housing/ Employment Topic Papers | It is noted that the Transport Topic Paper is the only source of dedicated transport evidence made available as part of the Regulation 19 consultation with respect to the potential impacts to the SRN. Further information is therefore requested on the cumulative development impact of the Local Plan policies and how these may affect the SRN outside of the evidence presented in support of the PfE. The Housing and Employment Topic Papers similarly recognise that development has the potential to lead to cumulative transport impacts, including those in proximity to the SRN. The Topic Papers confirm that detailed consideration of these impacts will be addressed through site-specific transport evidence at the planning application stage, supported through ongoing engagement with National Highways. |

**Table SD4: Responses submitted on the Strategic Flood Risk Assessment (SFRA)**

| Respondent ID | Comment ID | Name         | Organisation       | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 037           | OPP431     | Steve Stayce | Environment Agency | SFRA         | The SFRA Update has generally been carried out proportionately and read with the PfE Strategic Flood Risk Assessment provides an appropriate basis for decision-making. The conclusions previously reached through the PfE, Strategic Flood Risk Assessment process remain generally valid, and the updated flood modelling undertaken by the Environment Agency does not change the overall assessment of the strategic sites related to Oldham. Recommend a |

| Respondent ID | Comment ID | Name | Organisation | Policy/Topic | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|               |            |      |              |              | small number of refinements to enhance the document's robustness and better inform developers at application stage: Where the updated modelling identifies slight increases in Flood Zone 2 and 3 extents (for example JPA10 Beal Valley, JPA12 Broadbent Moss), the Strategic Flood Risk Assessment update would benefit from magnified mapping of the entire strategic allocations showing the most up to date flood mapping. This will support developers and ensure greater transparency when considering layout, design, and mitigation. Response goes on to outline which strategic allocations this would be of greatest benefit to. |

**Table SD5: Responses submitted on the Strategic Housing Land Availability Assessment (SHLAA) and Housing Topic Paper Appendix 1**

| Respondent ID | Comment ID | Name          | Organisation                         | Policy/Topic                 | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 035           | OPP388     | Alexis De Pol | Depol on behalf of Rowland Homes Ltd | Housing TP Appendix 1/ SHLAA | It is considered that a significant proportion of the Council's identified five-year supply in Appendix 1 does not meet this definition of deliverable and thus cannot be relied upon to satisfy the NPPF paragraph 69 requirement. This includes but is not limited to: All 955 dwellings in category v) 'Windfall sites not subject to any planning applications'; At least 816 dwellings in category iii) 'PfE allocations without permission'; 29 dwellings from identified stalled sites in category ii) 'Sites with extant permission'. This alone brings the identified supply down to 3,570 dwellings, which is below the minimum requirement required to demonstrate a sufficient supply of deliverable sites for the five years following the intended date of adoption. However, it is considered that in the SHLAA and Housing Topic Paper the Council have also failed to provide clear evidence that even the sites with extant permission in category ii) will deliver the amount of housing suggested within this five-year period, which further reduces the supply. Response includes analysis relating to |



| Respondent ID | Comment ID | Name        | Organisation                                                   | Policy/Topic          | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|               |            |             |                                                                |                       | windfall sites with no live applications - concluding that the LPA have failed to provide clear evidence that the sites in this category are available now, offer a suitable location for development now, and are achievable with clear evidence that housing will be delivered on the site within five years. They do not therefore meet the NPPF definition of being deliverable and all 955 dwellings from these sites should be removed from the supply. Response includes analysis relating to PfE allocations without permission it is considered that the Council have failed to provide clear evidence to justify the suggested delivery rates set out in Appendix 1 with respect to Beal Valley/ Broadbent Moss, Coal Pit Lane, Chew Brook and Cowlshaw (partly). As such at least 816 dwellings from these PfE strategic allocations should be removed from the five-year housing supply. In terms of sites with extant permission, it is not considered that the Council have provided clear evidence of specific, deliverable sites for five years following the intended date of adoption with an appropriate buffer, as is required by NPPF paragraph 69. |
| 025           | OPP296     | Cait O'Dowd | Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium | Housing TP Appendix 1 | As set out in Appendix 1 of the Housing Topic Paper, supports the recognition that housing delivery on the allocated sites of Beal Valley and Broadbent Moss can commence early in the Plan period as evidenced by the current live application submitted by Kellen Homes (248 homes). However, further delivery on the Broadbent Moss allocation before 2031/32 will depend on unlocking a substantial phase of development from the east of the allocation off Ripponden Road. These housing delivery assumptions broadly align with the Masterplan and Design Code. However, the targets for new dwellings and community facilities within the Broadbent Moss allocation beyond 2032/33 will depend on significant site preparation and east-west infrastructure works being viable and deliverable. It is therefore considered appropriate that delivery is set out in detail in the Masterplan and Design Code and the SHLAA rather than the Local Plan itself.                                                                                                                                                                                                     |

| Respondent ID | Comment ID | Name          | Organisation                         | Policy/Topic                 | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| 035           | OPP389     | Alexis De Pol | Depol on behalf of Rowland Homes Ltd | Housing TP Appendix 1/ SHLAA | It is considered that the SHLAA and Topic Paper Appendix 1 demonstrate the lack of realistically available housing opportunities within the borough to meet the minimum PfE housing requirement, let alone enable the Council to maintain a deliverable five-year housing supply based on the higher LHN using the updated standard method from March 2029. Comments provided on lack of deliverability of lapsed sites within supply, the conflict with the Beal Valley/ Broadbent Moss masterplan and the SHLAA evidence in terms of how many dwellings will be delivered within the plan period, and the deliverability of existing UDP housing allocations (especially ones in employment use); the lack of evidence to support the level of windfall development within the SHLAA and the policy issues of some of these sites. The removal of these sites alone would reduce the total identified supply to 9,567 dwellings, well below the minimum residual housing requirement over the plan period. This is also without taking account the fact that 1,442 dwellings in the SHLAA supply are on sites without permission or allocation which have a GMAL score of less than 4, which is relevant if the Policy H1 requirement for all proposed residential development to have a GMAL score of 4 or above is retained. Ultimately inclusion within the SHLAA does not mean planning permission would be granted even if an application were submitted. Consequently, the Council's own evidence in the SHLAA and Housing Topic Paper indicates that there are insufficient realistically available, suitable and deliverable sites within the urban area to support the OLP strategy of relying on windfall sites to deliver the minimum PfE housing requirement and to maintain a deliverable five-year housing supply. This is without even allowing for the fact that from March 2029 the Council will have to maintain a five-year supply of sites based on the much higher LHN using the updated standard method. |

**No Responses were submitted on the 'Integrated Assessment' or 'Scoping Report Update'.**

## 21. Comments related to specific sites

**Table S1: Comments related to specific sites, including those put forward for residential development**

| Respondent ID | Comment ID | Name             | Organisation                                              | Site                                                                 | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------|------------|------------------|-----------------------------------------------------------|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 001           | OPP1       | Bruce O'Brien    | Emery Planning - on behalf of Oakmere Homes Ltd           | Land to the rear of 69 Broadway, Oldham, OL2 5DD                     | Support the de-designation of the Green Corridor and Link and open space and would like the site to be allocated for housing                                                                                                                                                                                                                                                                             |
| 006           | OPP60      | Gareth Salthouse | Emery Planning - on behalf Mr J Jaskolka                  | Land to the rear of 748 Ripponden Road, Grains Bar, Oldham, OL4 2LP. | The Local Plan Inspector's Report for the Oldham Unitary Development Plan (UDP) in 2005 recommended this site be removed from the Green Belt boundaries notwithstanding housing needs. The Council at the time rejected this recommendation and the reason given for refusing the recommendation is no longer relevant. Key site considerations and supporting information provided within the response. |
| 016           | OPP158     | Stephen Harris   | Emery Planning - on behalf of Redwaters Estates           | Land west of Failsworth Road, Failsworth.                            | Would like the site allocated for housing.                                                                                                                                                                                                                                                                                                                                                               |
| 013           | OPP159     | Stephen Harris   | Emery Planning - on behalf of Mr Lumb                     | Land to the north of Trent Mill, Shaw                                | Would like the site released from Green Belt.                                                                                                                                                                                                                                                                                                                                                            |
| 014           | OPP160     | Stephen Harris   | Emery Planning - on behalf of Sheridan Group              | Bottom Field Farm, Woodhouses                                        | Would like the site released from Green Belt.                                                                                                                                                                                                                                                                                                                                                            |
| 026           | OPP316     | Cait O'Dowd      | Ashton Hale on behalf of Saddleworth Property Partnership | Saddleworth Business Centre                                          | Saddleworth Business Centre is entirely under the ownership of Saddleworth Property Partnership, who seek to promote the viable site for alternative residential use. Key site considerations and supporting information provided within the response.                                                                                                                                                   |
| 029           | OPP336     | Cait O'Dowd      | Ashton Hale on behalf of                                  | Land off Ashton Road, Woodhouses                                     | The Site was identified in the 2019 draft GMSF (subsequently PfE) document as one of three allocations within the Green Belt                                                                                                                                                                                                                                                                             |

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|               |            |             | Grasscroft de Greenfield Ltd                                                              |                                                                                                          | at Woodhouses. Policy GM Allocation 22 identified that collectively the sites could deliver around 260 homes, although it did not provide a breakdown of how those homes might be split between the sites. The site remains suitable, available and deliverable for development, and in the event that additional land is required to deliver Oldham's housing need, it is exceptionally well placed to deliver it being in a sustainable location immediately adjacent to the existing settlement boundary of Woodhouses. Key site considerations and supporting information provided within the response.                                                                                          |
| 030           | OPP346     | Cait O'Dowd | Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell | Bee Mill, Royton                                                                                         | The site owners currently continue to support the ongoing operation of existing businesses at Bee Mill and recognise the site's role in supporting local employment however, they consider it important that the Local Plan provides flexibility to respond to future circumstances. As such, the site owners object to the continued designation of the Site as part of BEA8 and instead believe that Bee Mill represents a suitable and sustainable location for residential development in the future, should the site become available through relocation, business restructuring, or other unforeseen changes. Key site considerations and supporting information provided within the response. |
| 031           | OPP358     | Cait O'Dowd | Ashton Hale on behalf of Prestigious Homes North West                                     | Land at Former Birks Quarry, Huddersfield Road. Austerlands and Land north of Waterworks Road, Waterhead | These sites represent a sustainable and deliverable opportunity to contribute towards the borough's housing needs and should be considered for allocation. Both sites are available, suitable and achievable, and are located in sustainable locations. The continued designation of these sites as Green Belt is not justified, particularly where sites demonstrate characteristics of Grey Belt land, or make a limited contribution to Green Belt purposes. Key site considerations and supporting information provided within the response.                                                                                                                                                     |

| Respondent ID | Comment ID | Name          | Organisation                                          | Site                                                                        | Summary of Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 032           | OPP369     | Cait O'Dowd   | Ashton Hale on behalf of Andy Hulme                   | Land east of Standedge Road, Diggle and Land west of Standedge Road, Diggle | Representations made on behalf of the landowner. Both sites represent a sustainable and deliverable opportunity to contribute towards the borough's housing needs and should be considered for allocation. Both sites are available, suitable and achievable, and are located in sustainable locations with access to services, infrastructure and public transport. The continued designation of these sites as Green Belt is not justified in all cases, particularly where sites may demonstrate characteristics of Grey Belt land or make a limited contribution to Green Belt purposes. Representation includes background to the land interests; the case for housing delivery at these sites in relation to the policies within the Publication Plan; and supporting information. Key site considerations and supporting information provided within the response. |
| 034           | OPP385     | Cait O'Dowd   | Ashton Hale on behalf of Grasscroft de Greenfield Ltd | Land at Ashton Road, Oldham (Bardsley Vale)                                 | Site is located to the east of Ashton Road and to the south of Bardsley Vale Avenue. The site is accessed from Ashton Road and is currently in agricultural use. The land consists of two fields, separated by a row of trees and is classified as Green Belt. The land has excellent sustainability credentials, being located close to an established bus route and many facilities and services, which are reachable on foot. It would form a logical extension to an established residential area. It is also likely to constitute grey belt.                                                                                                                                                                                                                                                                                                                         |
| 035           | OPP391     | Alexis De Pol | Depol on behalf of Rowland Homes Ltd                  | Land to the south of Thornham Old Road                                      | If further Green Belt release is to be considered the site to the south of Old Thornham Road on the northern edge of Royton would be appropriate for housing allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |