

Oldham

Local Plan

**Oldham Local Plan Regulation 22
Consultation Statement**

July 2026



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1. Introduction

Purpose of the Statement

- 1.1. This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Oldham Local Plan in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.2. This Statement meets Regulation 22 (1) (c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with relevant Regulations and the adopted Statement of Community Involvement. It details the consultation that has been undertaken at each stage of the Local Plan preparation Regulation 18 Notification, Issues and Options, Draft Local Plan and Publication Plan, and sets out the consultation methods that have been employed, summarises the responses received and explains how the Local Plan has evolved because of the consultation.

Structure of the Statement

- 1.3. The Consultation Statement is structured as follows:
 - Section 1 provides the background to the preparation of the Oldham Local Plan.
 - Sections 2, 3 and 4 summarise the consultations carried out under Regulation 18 and how the comments received have been considered by the Council.
 - Section 5 provides details of public consultation undertaken as part of Regulation 19, a summary of the main issues raised as well as brief responses, including to any concerns raised regarding soundness or legal compliance in the representations.
- 1.4. The Consultation Statement has been prepared following the [Planning Inspectorate's Procedure Guidance](#).

Background

- 1.5. Preparation of the Oldham Local Plan has followed the timetable set out within the Council's [Local Development Scheme](#), albeit with a slight delay to submission. A summary of the key stages is provided below.

Regulation 18 Consultations

- 1.6. To help shape the content of the Plan informal consultation has been carried out, pursuant to Regulation 18, as follows:
 - [Regulation 18 Notification](#) – Summer 2017
 - [Issues and Options](#) – Summer 2021
 - [Draft Local Plan](#) – January to February 2024

- 1.7. The Council began preparing the Oldham Local Plan in 2017, starting with the Regulation 18 Notification consultation in July and August 2017. This stage provided an opportunity to consider the scope of the Oldham Local Plan Review. The purpose being to get an understanding from the local community and stakeholders as to what they felt the local plan should contain, what the key planning issues for Oldham were and what should be the main aims of the Plan. Details of the Regulation 18 Notification stage can be found in section 2 below.
- 1.8. Consultation was then carried out on Issues and Options in July and August 2021. This stage described the key challenges and broad issues facing Oldham and presented options on how these may be tackled through the Local Plan. It asked what kind of place the local community and stakeholders would like Oldham to be; and asked questions relating to specific areas of planning, such as the location of future housing, design of new buildings and protection of our open spaces. Details of the Issues and Options consultation can be found in section 3 below.
- 1.9. Subsequently, consultation on the Draft Local Plan was carried out January to February 2024. The Draft Local Plan contains a vision for Oldham based on a set of plan objectives and draft planning policies covering a wide range of topic areas. It was informed by comments collected from two consultations previously run by the Council, ongoing studies and evidence. At this stage, not only was the purpose of the Plan to set out policies to guide how the Council will manage development coming forward and identify designations for protection and enhancement of the borough's historic and environmental assets (for example), it also proposed allocations to meet our future housing and employment needs. Details of the Draft Local Plan consultation can be found in section 4 below.

[Regulation 19 Consultation](#)

- 1.10. Finally, the Council consulted on the Oldham Local Plan: Publication Plan in February to March 2026. The role and purpose of the Oldham Local Plan has evolved since preparation of, and consultation on, the Draft Local Plan. Allocations for housing and employment development are no longer being proposed. Instead, the focus is on 'non-strategic' development management policies.
- 1.11. One of the main reasons for the change in focus is that Places for Everyone (PfE) is now in place (following its adoption in March 2024). PfE forms part of our development plan and provides us with a suite of policies that set the strategic planning framework for the borough. As part of the development plan for the borough regard must be had to the policies within PfE when preparing and assessing development proposals. It is therefore unnecessary to repeat strategic planning matters addressed through PfE, and it would be unhelpful to do so and lead to ambiguity. Further information on the background to the Oldham Local Plan: Publication Plan can be found in the [Setting the Scene Topic Paper](#). Details of the Oldham Local Plan: Publication Plan can be found in section 5 below.
- 1.12. Oldham's Local Plan will guide development in the borough up to 2039. The main purposes of the Plan are to:
- Set out the policies through which the Council will manage development coming forward and use to determine planning applications;

- Identify designations, such as those for the protection of the borough's environmental and historical assets, our town centres, and employment areas; and
- Facilitate the development of supporting infrastructure, such as transport, education and utilities.

1.13. The Oldham Local Plan covers the whole borough except that part which falls within the Peak District National Park (PDNP).

1.14. Upon adoption, the Oldham Local Plan will sit alongside the Places for Everyone Joint Plan (PfE) as part of a suite of documents that form the development plan for the borough that also includes the Greater Manchester Joint Waste Development Plan Document (adopted April 2012) and the Greater Manchester Joint Minerals Development Plan Document (adopted April 2013). As well as any neighbourhood plans that may come into force during the lifetime of the Plan. It will replace the [Joint Core Strategy and Development Management Policies Development Plan Document](#)¹ that was adopted in 2011, and any remaining [saved planning policies](#)² from the Unitary Development Plan (UDP) 2006.

Remaining stages

1.15. The Council has assessed all the comments received during the Regulation 19 formal consultation and considers that the Local Plan is sound and can therefore be submitted for Examination in Public.

1.16. Upon submission to the Secretary of State the Plan will be examined by an independent Planning Inspector (to be appointed).

Statement of Community Involvement

1.17. The Planning and Compulsory Purchase Act 2004 (The Act) requires the Council to produce a Statement of Community Involvement (SCI).

1.18. The SCI identifies how the Council will involve the community in the consideration of planning applications, the preparation and revision of the Local Plan and it also sets out policies for giving advice or assistance on neighbourhood planning.

1.19. The SCI was first adopted as Council policy in April 2007 after an independent examination and public consultation. It was then reviewed in 2010, 2016, 2019, 2020 and 2021 to reflect changes in regulations and guidance during this time as well as the commencement of the Greater Manchester Spatial Framework (GMSF), now Places for Everyone (PfE). The current [SCI 2021](#)³ was adopted by the Council on 28th July 2021.

1.20. The SCI 2021 sets out a range of consultation methods that the Council could use to engage in the preparation of the Local Plan. Paragraph 4.65 of the SCI states

¹ This document can be found online at:

https://www.oldham.gov.uk/info/201229/current_local_planning_policy/978/joint_core_strategy_and_development_management_policies_development_plan_documents_dpds

² This document can be found online at:

https://www.oldham.gov.uk/info/201229/current_local_planning_policy/1005/saved_unitary_development_plan_policies

³ This document can be found online at:

https://www.oldham.gov.uk/homepage/1252/statement_of_community_involvement_2021

that as a minimum all draft Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) will benefit from the following approaches to community engagement:

- Public Notice outlining details of the Local Plan documents will be published;
- a press release with details of the Local Plan documents will be issued;
- the Local Plan documents will be published on the Council's website;
- the Local Plan documents will be made available at Oldham's public libraries;
- the Local Plan documents will be made available at the Council's principal office, i.e. at Access Oldham; and
- a letter or email will be sent to those relevant parties on the Local Plan mailing list, including statutory consultees, Oldham Partnership and Oldham Councillors explaining that the Local Plan documents are available for consultation and information on where they can be found.

1.21. During the Regulation 18 Notification consultation (see paragraphs 2.1 to 2.9 below) SCI 2016 was in place and during the Issues and Options consultation (see paragraphs 3.1 to 3.5) SCI 2020 was in place. An [archive for previous SCIs](#)⁴ is available online on the Council's website. The minimum requirements set out at paragraph 4.65 of the SCI 2021 were the same in both the 2016 and 2020 SCIs. The only exception being that in SCI 2020 reference was made to special arrangements required in response to coronavirus restrictions.

1.22. Additional consultation techniques that the Council may make use of over and above these minimum requirements, if considered appropriate and resources permitting, are set out in Table 1 of SCI 2021.

1.23. The evidence in this Consultation Statement demonstrates that the scope of consultation and the range of techniques that have been employed to reach people to date exceed that required in the Council's SCI (in place at the time of the relevant consultation) and accord with the requirements of the Regulations.

Duty to Co-operate

1.24. A Statement of Co-operation (including signed Statements of Common Ground) has been prepared to support the review of Oldham's Local Plan. To demonstrate how through the preparation of the Plan we have co-operated with our neighbouring authorities and other relevant public bodies on strategic priorities, including those that cross boundaries.

1.25. Whilst the formal Duty to Co-operate no longer applies, there is still a need for local planning authorities to continue to collaborate across their boundaries, especially in relation to addressing unmet development needs from neighbouring areas, and in

⁴ An archive of previous Statement of Community Involvements can be found at: https://www.oldham.gov.uk/downloads/download/479/local_development_framework_statement_of_community_involvement

line with the policies in the National Planning Policy Framework (NPPF) on 'maintaining effective co-operation'.

- 1.26. As explained in paragraphs 1.10 and 1.11 above, the Oldham Local Plan does not include strategic policies. Instead, its focus is on development management policies that support the implementation and interpretation of PfE policies in Oldham. Given the role and purpose of the Oldham Local Plan there are therefore limited strategic matters of a cross-boundary nature to be considered, above and beyond those addressed through PfE.
- 1.27. Nevertheless, the opportunity has been taken, through the Statement of Co-operation, to identify those matters that may have cross-boundary implications and to outline Oldham Council's commitment for continued collaboration with our neighbouring authorities, the other PfE districts and Stockport Metropolitan Borough Council, and other public bodies.
- 1.28. An updated Statement of Co-operation (including signed Statements of Common Ground) has been submitted alongside the Oldham Local Plan: Publication Plan to the Planning Inspectorate. A Statement⁵ was also published alongside the [Draft Local Plan](#)⁶ in January 2024 and alongside the [Oldham Local Plan: Publication Plan](#)⁷ in January 2026.

⁵ At Draft Local Plan and Publication Local Plan consultation stages this document was called a 'Statement of Common Ground'.

⁶ This document can be found online at:
https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan

⁷ This document can be found online at:
https://www.oldham.gov.uk/downloads/download/2482/oldham_local_plan_publication_plan_statement_of_common_ground

2. Regulation 18 Notification

- 2.1. To begin preparation of the Local Plan the Council carried out a 'Regulation 18' Notification consultation. Comments were invited over a six-week period from 10 July to 21 August 2017.
- 2.2. This was an early stage in the Regulation 18 process where the Council sought views from the local community and stakeholders about:
- What the Local Plan should contain;
 - What the key planning issues are for Oldham; and
 - What the aims of the Local Plan should be.
- 2.3. Details of the [Regulation 18 Notification](#)⁸ can be viewed on the Council's website and at Appendix 1.
- 2.4. In accordance with paragraph 4.37 of the [2016 SCI](#)⁹ the following minimum requirements were met:
- Public Notice outlining details of the Local Plan document was published in the Oldham Evening Chronicle on Monday 10 July 2017 (see Appendix 1b).
 - A press release with details of the Local Plan document was issued (see Appendix 1c).
 - Details of the Regulation 18 Notification were published on the Council's website (see Appendix 1d). Content can still be viewed on the Regulation 18 Notification¹⁰ consultation stage by visiting the Council's Local Plan Review webpage.
 - The Local Plan document was made available at public libraries and the Council's principal office (see Appendix 1e for copy of poster put on display).
 - The Local Plan document was sent to all relevant Statutory Consultees, Oldham Council Councillors, the Oldham Partnership and relevant parties on the Local Plan mailing list electronically and explaining that the Regulation 18 Notification was available for consultation (see Appendix 1f to 1i). Appendix 1 of the 2016 SCI lists the types of specific, general and Duty to Cooperate bodies consulted.
- 2.5. Alongside the Regulation 18 Notification the Council prepared an Integrated Assessment Scoping Report. This is the first stage of the IA process. It identifies the scope and level of detail to be included in the IA report. The Scoping Report sets out the context and identifies relevant environmental, economic and social issues, objectives and an assessment framework. As required the Council consulted the

⁸ This document can be found online at:

https://www.oldham.gov.uk/info/201233/local_plan_review/2738/local_plan_review_regulation_18

⁹ This document can be found online at:

https://www.oldham.gov.uk/downloads/download/479/local_development_framework_statement_of_community_involvement

¹⁰ Information on the Regulation 18 Notification and its consultation can be found online at:

https://www.oldham.gov.uk/info/201233/local_plan_review/2738/local_plan_review_regulation_18

following three consultation bodies on the Scoping Report for a minimum of five weeks:

- Historic England;
- Natural England; and
- Environment Agency.

2.6. A copy of the email sent to the three prescribed consultation bodies can be found at Appendix 1j.

2.7. The [Integrated Assessment Scoping Report](#)¹¹ can be viewed on the Council's Local Plan Review webpage.

2.8. Key messages that arose from the Regulation 18 Notification are set out in Table 1 overleaf.

2.9. A summary of the comments received to the Regulation 18 Notification and the Council's response can be found in the [Regulation 18 Summary of Comments Received and the Council's Response](#)¹².

¹¹ This document can be found online at:
https://www.oldham.gov.uk/downloads/file/7666/integrated_assessment_scoping_report

¹² This document can be found online at:
https://www.oldham.gov.uk/downloads/file/6989/regulation_18_summary_of_comments

Table 1: Summary of key messages from Regulation 18 Notification

Relationship with other plans: Need to make clear how the Local Plan will relate to GMSF (now Places for Everyone) and how delineation will be made between strategic and non-strategic policies. Need to support Saddleworth Neighbourhood Plan.
Green Belt and rural policies: Oppose the release of Green Belt for development needs. The Local Plan should allocate non-strategic sites at the micro level for development. Need to allow the development of low-quality Green Belt or safeguarded land. The Local Plan should identify land to be safeguarded for future development needs. Green Belt policies should remain strong. There is a need for rural policies.
Other Protected Open Land: Oppose loss / development on Other Protected Open Land (OPOL). OPOL sites need to be reviewed and fully / partly released for development.
Brownfield land: Preference for development on brownfield land first before greenfield land. Mills and vacant buildings / land should be used for redevelopment. The need to establish a brownfield register.
Transport Infrastructure - congestion: Concerns around traffic / congestion and road safety.
Sustainable transport: Improvements in walking and cycling infrastructure needed. The need for frequent reliable public transport. Housing should have electric vehicle charging points.

Accessibility needs to be addressed: Footpaths and pavements need to be planned for wheelchair users. Some areas have no / very narrow pavements. Need more disabled car parking spaces. Buildings need to be accessible to wheelchair users.
Green Infrastructure: The need to maintain and enhance green infrastructure, including nature designations and provide safe open space, including recreation facilities, to deliver a wide range of benefits. Impacts from development on biodiversity need to be considered. Landscape character must be protected, conserved and enhanced.
Social Infrastructure: Concerns around social infrastructure e.g., school places, health care, leisure centres etc.
The need for other infrastructure: Electricity, gas, water and sewerage. Broadband - the need to improve broadband speeds.
Housing type: The need for affordable and social housing that meet local need. Size, type and tenure are important considerations. No need for executive style homes. Do not wish to see a lot of high tower accommodation. Need housing for older people wishing to downsize. Need for adapted homes for people with disabilities. Need to tackle homelessness and homes for younger people. Need to address the impact of Houses of Multiple Occupation.
Housing numbers: Figures need to be revisited. Supply of housing land should be increased. Need to demonstrate sites are deliverable.

Need a combination of large and small sites to deliver housing.
Housing locations: Need to be in accessible locations and next to public transport. Town centres can be redeveloped for higher density housing that respects landscape and character. Consider proximity to wastewater treatment works as could have adverse impacts. Consider sites previously used for employment.
Employment: Need to rethink the industrial strategy, considering the location to Manchester. Do not need more warehouses. The need for job creation and economic growth that matches growing sectors. Support digital businesses. Need a range of employment sites in suitable locations. Support small businesses and technology companies in Saddleworth.
Centres and retail: Must define hierarchy of centres and define extent of centres and primary shopping areas. Retail study needs updating. Need to ensure appropriate provision of retail. The need for shops - independent and national. New retail should not leave existing buildings derelict. Impact on traffic should be a defining factor. Should invest in smaller local centres and introduce new retail areas to support neighbourhoods where there is no retail provision. Support mixed use developments. Need high quality amenities. Need to provide parking and improve local transport to encourage residents to shop local. Too many fast-food shops. Need to introduce Article 4 Directions.
Culture: The need to safeguard and promote culture activities and venues. The need to promote tourism Heritage: Heritage is an asset in the borough and should be used to enhance the borough and protect distinctiveness. Need to ensure the conservation and enhancement of the historic environment. Need to ensure new sites do not have an adverse impact on heritage assets.

Design: Need to reduce crime and anti-social behaviour. Housing must be in keeping with the area. Need to be careful not to spoil adversely impact areas. Development should have to meet standards such as BREEAM. Design policies should not be too prescriptive.
Flood risk and water quality: Development should not take place in areas prone to flooding. Water storage should take place in the uplands. Impermeable surface water runoff must be considered. Sustainable drainage encouraged. Need to consider Groundwater Source Protection Zones.
Climate change and energy: High energy efficiency and renewable energy sources should be imposed on new developments. Affordable warmth is important. Support for larger renewable / low carbon energy schemes. There is poor air quality.
Health: Issues of obesity, mental health and wellbeing, loneliness and inequalities across the borough. Impacts from air quality.
Communication: Issues raised over consultation techniques Website is dated and unhelpful.

3. Issues and Options

- 3.1. The second stage of consultation in the Local Plan Review was on the [Issues and Options](#) document 5th July to 29th August 2021.
- 3.2. This built upon the comments received from the Regulation 18 Notification and was informed by on-going studies and evidence work. It described the key challenges facing Oldham and sought views on the issues facing Oldham and the kind of place residents would like Oldham to be. Alongside questions and options relating to specific areas of planning such as the location of future housing, design of new buildings and protection of open spaces.

Consultation undertaken

- 3.3. In accordance with paragraph 4.65 of the [2020 SCI](#)¹³ the following minimum requirements were met:
- Public Notice (see Appendix 2a) outlining details of the Local Plan document was published in the Oldham Evening Chronicle on 5 July 2021 (see Appendix 2b).
 - A press release with details of the Local Plan document was issued (see Appendix 2c).
 - Details of the Issues and Options consultation were published on the Council's website. Content can still be viewed on the [Issues and Options consultation](#)¹⁴ stage by visiting the Council's Local Plan Review webpage.
 - The Issues and Options consultation documentation was made available at public libraries and the Council's principal office (see Appendix 2d for copy of poster put on display and Appendix 2e for copy memo sent to all libraries).
 - The Local Plan document was sent to all relevant Statutory Consultees, Oldham Council Councillors, the Oldham Partnership and relevant parties on the Local Plan mailing list electronically and explaining that the Local Plan Document is available for consultation (see Appendix 2f and 2g). Appendix 1 of the 2020 SCI lists the types of specific, general and Duty to Cooperate bodies consulted.
- 3.4. Various social media posts were also issued at regular intervals during the Issues and Options consultation.

Comments received

- 3.5. A summary of the comments raised at the Issues and Options consultation is provided in Table 2 overleaf. A full summary of the comments received, and the Council's response can be found in the [Issues and Options Comments and](#)

¹³ This document can be found online at: https://www.oldham.gov.uk/downloads/download/479/local_development_framework_statement_of_community_involvement

¹⁴ Details regarding the Issues and Options consultation can be found online at: https://www.oldham.gov.uk/info/201233/local_plan_review/1809/issues_and_options

[Response Schedule](#)¹⁵. This includes details of any changes that have been made to demonstrate how comments have informed preparation of the Draft Local Plan.

¹⁵ This document can be found online at: https://www.oldham.gov.uk/downloads/file/7824/issues_and_options_-_comments_and_response_schedule

Table 2: A summary of the Issues and Options Consultation Responses

Vision for Oldham: General support for the Vision which was considered positive in its intent and ambitions. Encouraging an appropriate scale of housing and employment growth and protecting the natural and historic environment were broadly supported. Comments highlighted the need to include reference to improving health and wellbeing for the residents of Oldham.
Plan Objectives: The objectives were generally supported, particularly in relation to the supply of housing to meet housing needs. Some amendments were suggested including that multi-functional sustainable drainage should be prioritised and including references to transport in objectives PO4, PO5, PO6 and PO7.
Homes: Concerns relating to building homes on Green Belt. Support for developing brownfield sites. Concerns relating to an over-reliance on brownfield sites. General support for providing for the needs of an ageing population. Some support for all new homes to be built as lifetime homes however concerns around viability. General support for housing mix, but some responses highlight the need to be flexible as a prescriptive mix can be restrictive as needs and demand will vary depending on location. Some support for 30% affordable housing across the borough, however some developers/agents expressed the need to undertake assessments for need as well as the viability implications of providing an affordable housing requirement. Mixed response around Vacant Building Credit (VBC). The level of private rented accommodation should not be set as a policy requirement. Concern was expressed for the increase in Houses in Multiple Occupation (HMOs). Mixed response to questions relating to custom and self-build with support for custom and self-build towards overall housing supply but acknowledgment that there can be challenges in delivery. Support for a specific policy on the use of properties as children's homes. A mixed response was received to the question relating to minimum density assumptions. More clarity was sought in relations to centres and comments that residential density should be based on local character.

Economy and Employment:

Impact of online shopping on the economy must be considered.

Concerns of an oversupply of logistics warehousing due to Northern Gateway.

Mills should be considered on an individual basis in terms of employment use.

Oldham's Green New Deal and tackling climate change should be at the heart of the development of the economy and employment.

Support for a flexible approach to employment areas, sites considered on own merits and some site-specific comments.

In relation to allocating employment land, one comment was received in support for a combination of providing some new employment land and improving sustainable connectivity to existing and neighbouring districts key employment sites.

Request that sites with heritage assets have Historic Impact Assessments and that sites in close proximity to SAC and SSSI's are assessed in Habitats Regulations Assessment.

Support for the inclusion of a policy that protects and promotes cultural venues.

Suggestions for building on Oldham's tourism base.

Growing need for overnight/long stay accommodation in appropriate rural locations (log cabins, camp sites).

Need to promote our green areas.

Should support Northern Roots as a sustainable visitor attraction as well as for the range of other environmentally friendly benefits it will bring.

Support for the retention of a farm diversification policy.

Our Centres:

Support for the distinction between the different centres in the borough.

Suggestions that the existing retail hierarchy should be replaced as it does not reflect the retail distribution of the area.

Suggestion that the type of housing that would be suitable for centres would be single person households and older people.

Addressing Climate Change:

Support for climate change policy to be intrinsically linked to wider policies in the Plan including those related to design of new development and the provision of green and blue infrastructure.

Suggestion that chapter could make reference to Greater Manchester's Environment Plan targets.

Support for Modern Methods of Construction (MMC) and mapping out opportunities for renewable and low carbon energy though some developers consider a policy is unnecessary.

Support for policies managing surface water runoff which accord with either national standards or standards referenced in the Greater Manchester SFRA.

Support for SUDs and using natural processes to mitigate flood risk. Comments that the natural environment is important for mental health. Concerns raised over the development of the Green Belt and Other Protected Open Land. General support for Green Belt enhancement opportunities.
The Natural Environment and Open Land: Mixed responses to the question of whether sites that have met Local Green Space criteria should be designated as such. Some felt that sites not meeting the criteria should not be de-designated as Other Protected Open Land (OPOL). Some OPOL sites were put forward as needing safeguarding from future development. Suggestion that the Accessible Natural Greenspace Standard (ANGSt) could be a useful tool.
Green Infrastructure: Some comments advocated the need to protect ancient woodland. Should use brownfield land rather than greenfield. A mixed response to the options put forward to ensure that green infrastructure is embedded across the borough and in the built environment. General support for biodiversity net gain to be delivered as close to the site as possible. Support for net gain being delivered on local projects. Mixed response in terms of whether a higher than minimum biodiversity net gain should be applied to developments. General support for restricting the paving of front gardens. Some respondents favoured setting minimum garden requirements. Varying responses in relation to open space, preferences for on-site provision and pooling. Recommendations that decisions for open space provision are made based on evidence. Peak District National Park requested to be referenced in enhancing the access to the wider countryside. Support for space for food growing new developments. Support for a policy regarding the protection of trees.
The Built Environment – Historic Environment: Most respondents agreed that the extensions to the Oldham Town Centre Conservation Area should be included on the policies map. However, one respondent stated that the conservation area should not be extended. Important policy areas specific to Oldham are the future use of textile mills and seeking to enhance Oldham Town Centre Conservation Area with the aim to remove it from the 'at risk' register. Localised policies supported. A mixed response was received to the question of the proposed policy approach to high, medium and low priority mills and mill clusters.

The Built Environment – Design:

Support for the production of a Local Design Code.

Some comments around detailed design policies needing to be flexible and not hinder development delivery or stifle imaginative high-quality design.

Transport and Improving Connectivity:

General support for suggestions to improve transport and connectivity.

Additional key services could include digital connectivity (broadband and mobile phone).

Suggestion that major developments should have access to all or the majority of services.

Level of public transport accessibility should be high.

General support for the principle of 20-minute neighbourhoods, although one commented that this is not practical in a rural environment such as Saddleworth.

General support for all new development to provide EV charging points.

Support for a standalone policy for utilising the Streets for All guidance.

A policy may also be required that ensures that all access roads into new developments and all roads within new developments that are to be delivered by developers, are designed to be compliant with Streets for All principles. Support for Bee Network proposals to be identified on the proposals map.

TfGM suggest that the proposals map shows the 'confirmed infrastructure' only (i.e. Oldham's sponsored schemes).

Support for public transport pass as part of some new developments.

Communities:

Recognise the importance of protecting heritage assets and assets of community value.

The Council should commit to maintaining the register of assets of community value.

Mixed responses in relation to Hot Food Takeaway question. Support for a policy which restricts the location of hot food takeaways within 400m of a school and in areas with high levels of obesity, but another commented that proximity-based policies are weak and conflicting and that there should be no assumption that takeaway outlets will only sell cheap fast food.

Health Impact Assessments should be mandated for all developments.

Support for protecting suitable sites for potential future education facilities/services.

Mixed response as to whether pubs should be included within the definition of community facilities.

Community facilities should also include churches, libraries and schools.

Support for Article 4 Direction in rural areas. Support for social value in developments policy. Support for a policy outlining the agent of change principle. Support for separate policies relating to the local environment
Infrastructure: Financial contributions should be channelled into communities where the development occurs. Suggestion that policy be worded to support utility sites in Green Belt /Open Countryside for operational purposes. Support for policy seeking the provision of supporting necessary infrastructure. A policy that provides a formula and clarity over what planning obligations will likely be sought is supported. Suggestion that any policy should allow for flexibility and site-specific circumstances. Suggestion that the Council produce a Planning Obligations SPD.
Monitoring: A range of comments suggesting further indicators that should be included. Advice that monitoring indicators should meet the requirements of the Environmental Assessment of Plans and Programmes 2004 to included suitable monitoring indicators in the Sustainability Appraisal, Local Plan or post adoption statement.
Overarching: Comments received relating to PfE and specific planning application which are separate to the Local Plan Issues and Options consultation. More could be added to the Spatial Portrait - a brief narrative on the evolution of the borough's historic environment and the growth of the town during the 19th century.

4. Draft Local Plan

- 4.1. The third stage of consultation in the Local Plan Review was on the [Draft Local Plan](#) and took place between 10th January and 25th February 2024.
- 4.2. This built upon the comments received from the Regulation 18 Notification, Issues and Options consultation and was informed by on-going studies and evidence work. It contained a vision for Oldham, a set of plan objectives and draft planning policies covering a wide range of topic areas including housing, open land, centres, our economy, climate change, design, transportation and our communities.

Consultation undertaken

- 4.3. In accordance with paragraph 4.65 of the [2021 SCI](#)¹⁶ the following minimum requirements were met:
- Public Notice (see Appendix 3a) outlining details of the Local Plan document was published in the Oldham Evening Chronicle on 11 January 2024 (see Appendix 3b).
 - A press release with details of the Local Plan document was issued (see Appendix 3c).
 - Details of the Draft Local Plan consultation were published on the Council's website. Content can still be viewed on the [Draft Local Plan consultation](#)¹⁷ stage by visiting the Council's Local Plan Review webpage.
 - The Draft Plan consultation documentation was made available at public libraries and the Council's principal office (see Appendix 3d for copy of poster put on display and Appendix 3e for copy memo sent to all libraries).
 - The Local Plan document was sent to all relevant Statutory Consultees, Oldham Council Councillors, the Oldham Partnership and relevant parties on the Local Plan mailing list electronically and explaining that the Local Plan Document is available for consultation (see Appendix 3f and 3g). Appendix 1 of the 2020 SCI lists the types of specific, general and Duty to Cooperate bodies consulted.
- 4.4. Various social media posts were also issued at regular intervals during the Draft Local Plan consultation, and the consultation was hosted on the Council's consultation portal, 'The Big Oldham Convo' (see Appendix 3h).
- 4.5. Drop-in sessions were held across the borough on the following dates:
- Monday 29 January - 3pm until 7pm at the Shaw Lifelong Learning Centre, High Street, Shaw, OL2 8TB
 - Monday 29 January - 3pm until 7pm at the Chadderton Library and Wellbeing Centre, Burnley Street, Chadderton, OL9 0JW

¹⁶ This document can be found online at:

https://www.oldham.gov.uk/info/201232/engagement/253/statement_of_community_involvement

¹⁷ Details regarding the Draft Local Plan consultation can be found online at:

https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan

- Wednesday 31 January - 10am until 7pm at the Performance Space, Gallery Oldham, Greaves Street, Oldham, OL1 1AL
- Thursday 1 February - 3pm until 7pm at the Whitekirk Hall, Failsworth Town Hall, Oldham Road, Failsworth, M35 0FJ
- Thursday 1 February - 3pm until 7pm at the Council chamber, Uppermill Civic Hall, Lee Street, Uppermill, OL3 6AE

4.6. [Frequently asked questions](#)¹⁸ were also published to provide more information on the Draft Local Plan and the consultation.

Comments received

4.7. A summary of the comments raised at the Draft Local Plan consultation is provided in Table 3 overleaf. A full summary of the comments received, and the Council's response can be found in the [Draft Local Plan Schedule of Comments Received](#)¹⁹. This includes details of any changes that have been made to demonstrate how comments have informed preparation of the Publication Plan.

¹⁸ This document can be found online at:
https://www.oldham.gov.uk/downloads/file/7949/faqs_draft_local_plan_2024

¹⁹ This document can be found online at:
https://www.oldham.gov.uk/downloads/download/2480/oldham_draft_local_plan_schedule_of_comments_received

Table 3: A summary of the Draft Local Plan Consultation Responses

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

A number of site-specific comments submitted regarding the suitability of proposed housing and mixed-use allocations along with further work that may be needed.
Economy and Employment: Site-specific comments received regarding the suitability of some of the proposed Business and Employment Areas and employment allocations, along with further work that may be needed. Comments regarding the agent of change principle being included.
Tourism: General support for the policies. Comments regarding the need to improve Oldham's night-time economy, the need for more independent and artisan businesses and that a bus service to Dove Stones would be good. References to accessing tourism destinations by sustainable transport and active travel modes should be included. Farm diversification policy welcomed. Holiday accommodation should be referenced in both policies.
Our Centres: Amendment to Oldham Town Centre and Shaw Centre requested to include Alexandra Retail Park and Asda respectively. Comments made regarding the need to improve our centres as they are falling into disrepair. Criticism that Policy C3 requires a lower than NPPF Impact Assessment threshold and do not think there is enough evidence to justify it. General support that the policies should reduce the need to travel by car.
Oldham Town Centre: Comments on the inclusion of Oldham Coliseum in the conservation area and its preservation. Comments that the Civic Centre site is an important landmark and should not be lost. Support for making more use of Oldham Town Centre for residential, though an objection to building big blocks of flats throughout the town centre. Support for improved public realm and a request to consider surface water management as part of this. Support for green infrastructure improvements in Oldham Town Centre.

Addressing Climate Change:

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

Comment that GMCA will not meet their commitment of carbon neutrality without taking into account the regions peat soils.

In relation to renewable and low carbon energy regard should also be had to the Functionally Linked Land and the protection of deep peat soils should also be referenced.

The setting of the National Park and reference to water catchment land should be listed as constraints for renewable and low carbon energy.

In relation to flood risk general support for the policy but comments regarding considering flood risk from canals in Flood Risk Assessments where applicable. Comments that it may be appropriate include reference to surface water risks in this paragraph relating to the sequential test. Reference is also made to the need to consult with United Utilities regarding any risk of flooding from reservoirs. General support for sustainable drainage policy though Canals and River Trust state that discharges to their network require consent and recommended some suggested text.

Further comment that the opportunity for nature-based solutions should be reflected in the wording of the policy and that applicants must make space available in their proposals for multi-functional sustainable drainage. Requests that allocations in PfE can be exempt from the requirement for a site-wide drainage, foul and surface water strategy.

Comments regarding water efficiency include that adopting the optional standard for water efficiency of 110 litres per person per day is not justified nor consistent with national policy.

Comment requiring clarity in terms of how applicants for major non-residential developments should comply with the policy and that the target measure of water used for BREEAM 'Excellent' and 'Very Good' are the same.

General support for Groundwater Source Protection Zones policy.

Natural Environment and Open Land:

General support for the policies.

Recommend strengthening references to the Peak District National Park in relation to their new Duty.

Requests for further releases from the Green Belt and a full Green Belt review.

Comment that the Green Belt policy is too detailed which it does not have to be as NPPF provides clear guidelines. Further policy detail on appropriate developments within the Green Belt not required. The 30% figure for extensions to existing buildings in the Green Belt must be fully justified.

Site-specific comments made in relation to potential Local Green Spaces regarding their suitability.
Addressing the Biodiversity Emergency: General support for Protecting Nature policy. Request a review of current green corridors. Comments made requesting Lapwings are added to the list of protected species and a request that reference is made to the protection of ecological corridors and to make sure that development does not adversely affect their function. Reference to peat should be made and priority species. In relation to Biodiversity Net Gain (BNG), comments were received regarding the different elements of the biodiversity metric, being able to purchase statutory credits and requiring over 10% BNG where justified. Comments that policy on BNG needs to be kept under review. Reference requested to invasive species and wider ecological networks. Request policy makes clear that biodiversity mitigation / enhancement should not be located directly over water and wastewater assets. In relation to green infrastructure, it was stated that there is no evidence to support encouraging food production within a residential development and a number of respondents commented that the requirement for 20% tree cover is unclear and ambiguous and does not comply with paragraph 16(d) of the NPPF. There were comments supporting the use of GI in providing a nature-based solution to climate change. Policy text on waterbodies and opportunities for enhancement was suggested. The tree replacement ratios proposed were criticised as having the potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments and described as overly prescriptive and not supported by any technical evidence or policy basis.
Historic Environment: General support for the policies. Request for footnotes to be added. Some site-specific comments made regarding the Mills Strategy. Request for public to be added before benefits. Request for 'designated and undesignated' in brackets in canals policy.
Creating a Better and Beautiful Oldham: General support for the policies.

Recommendations to include text around of the principles of healthy design, utility constraints active design and surface water management. Requests that allocations in PfE can be exempt from the requirement to reduce the scale of bulky buildings. Wording for inclusion on development proposals linking to opportunities to manage surface water and reduce flood risk submitted. Comments that Design Review is a tool that should be used appropriately and in a proportionate manner. Some concerns regarding the policy concerned with tall buildings in relation to ecology, the potential impact on air navigation and what evidence base has been used to inform it.
Creating a Sustainable, Active, Accessible Network for Oldham: Request reference should be given towards offsite improvements to walking and cycling infrastructure. Comments made to encourage Active Design Guidance being referenced within this section. Comment that it is not consistent with national policy to require new development reduce road casualties, improve highways safety and address traffic congestion. Encourage that economic and transport links with Manchester Airport are considered. Comments that the requirement for non-residential developments to include a minimum of 20% of spaces with charging facilities, may be challenged as it is envisaged that a significant amount of EV charging is anticipated to be done at home. Transport Assessments and Statements should include information on all modes of travel including public transport not just vehicle and pedestrian movements. Comments made regarding including specific reference to the requirement of screening all transport assessments for all allocated development policies (specifically more than 100 vehicles or 20 Heavy Good Vehicles which may pass Holcroft Moss SSSI along the M62).
Communities: General support for the open space policies, with the exception of Sport England who state that a standards-based approach is not supported. General support for the Cultural, Community and Health Facilities policy, however comments that the NHS requires flexibility with regards to the use of its estate and whether it is surplus to requirement is judged by local health commissioners and NHS England. In relation to securing education places through developments, comments received that as a Viability Assessment has not been produced comments cannot be made. Request that greater clarity over how developer contributions will be sought to meet the need for early years, post-16 and SEND Places.

Comment that the requirement for Health Impact Assessment (HIA) for developments of 100 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population and is not justified by national guidance.

Comments made regarding the public transport and key services definitions.

Protecting Our Local Environment:

General support for the policies.

Comment that the Local Plan should include a policy for the protection of Best and Most Versatile (BMV) agricultural land.

Comment that the Local Plan should captures the agent of change principle to protect the operation of existing businesses / operations from encroachment issues.

Comment that policy should be re-worded to refer to the potential submission of land stability reports to address land instability issues.

In relation to air quality alignment should be made to PfE with regard the proposed mitigation that is required to avoid adverse effects at Holcroft Moss SSSI under JP-G9 (now JP-G8) Policy JP-C7 (now JP-C8).

Infrastructure and Delivery:

Comments regarding the lack of a Viability Assessment and how that makes it not possible to comment on the viability of the policies proposed in this Plan.

Concern that the Council are restricting the circumstances where it is possible to submit a Viability Assessment.

Request that air traffic safety is referenced in relation to new masts or telecommunications equipment.

Request financial contributions associated to the management of Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors SAC and Holcroft Moss SSSI are included.

Comment that there is a need to set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement.

It may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure, wording setting out this should be included.

NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area.

Mixed comments received regarding the need for a Social Value policy; some support but another comment that it is an unnecessary burden.

Monitoring:

Some amendments to indicators and suggestions for new indicators were submitted.

Overarching:

To be consistent with NPPF, the plan period should be extended to 2040 at the earliest.

Too much reliance on brownfield land.

The documents are too long and too complicated.

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

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

5. Publication Local Plan

5.1. The following section sets out how the Regulation 19 Local Plan consultation was undertaken, the number of representations made, a summary of the issues raised in those representations and an initial Council response to these issues.

5.2. Consultation on the [Oldham Local Plan: Publication Plan](#)²⁰ took place between 4 February 2026 and 27 March 2026. The consultation involved the following documents:

- The Publication Plan and appendices
- The Publication Plan Policies Map
- The Publication Plan Integrated Assessment and appendices (including the Sustainability Appraisal, Habitat Regulations Assessment, Health Impact Assessment and Equalities Impact Assessment)
- Supporting documents and evidence prepared to support preparation of the Oldham Local Plan as set out in the [Document List](#)²¹ and including the [Statement of Common Ground](#)²² and [Infrastructure Delivery Plan](#)²³

5.3. This 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. It contained a vision for Oldham, a set of plan objectives and planning policies covering a wide range of topic areas including housing, open land, centres, our economy, climate change, design, transportation and our communities.

Consultation undertaken

5.4. In accordance with paragraph 4.65 of the [2021 SCI](#)²⁴, the following minimum requirements were met:

- Public Notice (see Appendix 4a) outlining details of the Publication Local Plan document was published in the Manchester Evening News on Wednesday 4 February 2026 (see Appendix 4b).
- A press release with details of the Publication Local Plan document was issued (see Appendix 4c).
- Details of the Publication Stage Local Plan consultation were published on the Council's website. Content can still be viewed on the [Publication Local](#)

²⁰ This document can be found online at:

https://www.oldham.gov.uk/downloads/download/2476/oldham_local_plan_publication_plan_main_document

²¹ This document can be found online at:

https://www.oldham.gov.uk/downloads/download/2478/oldham_local_plan_publication_plan_documents_list

²² This document can be found online at:

https://www.oldham.gov.uk/downloads/download/2482/oldham_local_plan_publication_plan_statement_of_common_ground

²³ This document can be found online at:

https://www.oldham.gov.uk/downloads/download/2481/oldham_infrastructure_delivery_plan

²⁴ This document can be found online at:

https://www.oldham.gov.uk/homepage/1252/statement_of_community_involvement_2021

[Plan consultation](#)²⁵ stage by visiting the Council's Local Plan Review webpage.

- The Publication Plan consultation documentation was made available at public libraries and the Council's principal office (see Appendix 4d for a copy memo sent to all libraries).
- The Publication Local Plan document was sent to all relevant Statutory Consultees, Oldham Council Councillors, the Oldham Partnership and relevant parties on the Local Plan mailing list electronically explaining that the Publication Local Plan Document is available for consultation (see Appendix 4e and 4f). Appendix 1 of the 2021 SCI sets out the types of specific, general and Duty to Cooperate bodies consulted.

5.5. Social media posts were also issued during the Publication Stage Local Plan consultation, and the consultation was hosted on the Council's consultation portal, 'The Big Oldham Convo' (see Appendix 4g).

5.6. In addition to the above, to aid greater understanding of the Regulation 19 the following documents were prepared:

- [Frequently asked questions](#)²⁶ providing more information on the Plan, the tests of soundness and the consultation.
- Alongside the representation form, [Representation Form Guidance Notes](#)²⁷ were published on what makes a suitable representation, including the importance of commenting on the soundness of the Plan. The representation form was also made available via the Council's consultation portal 'The Big Oldham Convo' and online so that it could be completed and directly submitted online or downloaded and sent via email. Comments were also accepted via email or letter.

5.7. The combination of the measures set out above ensured that the consultation reached a wide range of stakeholders both online and through more traditional means.

Comments received

5.8. During the Regulation 19 consultation, a total of 433 individual comments were received from 46 separate respondents. 1.63% were from members of the public and 98.37% were from organisations.

5.9. The policies and topic areas receiving representations are identified in Table 4 overleaf.

²⁵ Details regarding the Publication Local Plan consultation can be found online at:

https://www.oldham.gov.uk/info/201233/local_plan_review/3319/publication_plan

²⁶ This document can be found online at:

https://www.oldham.gov.uk/downloads/download/2484/oldham_local_plan_publication_plan_faqs

²⁷ This document can be found online at:

https://www.oldham.gov.uk/downloads/download/2487/oldham_local_plan_publication_guidance_note_for_submitting_comments

Table 4: Policies/ topic areas receiving representations

Local Plan Policy / Topic / Chapter	Total Number of Representations Received
Build a Better Oldham	3
Spatial Portrait	14
Oldham's Local Plan and PfE	0
Oldham's Local Plan and Neighbourhood Planning	0
Vision	10
Plan Objectives	13
Key Diagram	2
General Housing	3
H1: Delivering a Diverse and Sustainable Housing Offer	23
H2: Density of New Housing	12
H3: Housing Mix	13
H4: Providing for Local Housing Needs	4
H5: Affordable Housing	14
H6: Houses in Multiple Occupation	2
H7: Gypsies, Travellers and Travelling Showpeople	1
General Economy and Employment	2
E1: Employment and Floorspace Requirements	8
E2: Business and Employment Areas	6
E3: Exceptions within Business and Employment Areas	1
E4: Employment Sites outside of Business and Employment Areas	2
E5: Reuse and redevelopment of Mill Buildings	2
General Our Centres	1
C1: Our Centres	1
C2: Protecting the vitality of our centres	2
C3: Changes of use and redevelopment within the borough's centres	1
C4: Local Services and Facilities	2

Local Plan Policy / Topic / Chapter	Total Number of Representations Received
OTC1: Oldham Town Centre	4
OTC2: Protecting and Enhancing Oldham Town Centre Conservation Area	1
OTC3: Creating a Better Public Realm for Oldham Town Centre	2
OTC4: Green Infrastructure within and around Oldham Town Centre	7
General Addressing Climate Change	5
CC1: Renewable and Low Carbon Energy	10
CC2: Managing Flood Risk	7
CC3: Sustainable Drainage – Foul and Surface Water	9
CC4: Water Efficiency	3
CC5: Groundwater Source Protection Zones	3
General Natural Environment and Open Land	1
OL1: Consideration for the Peak District National Park	2
OL2: Oldham's Green Belt	12
OL3: Extensions and alterations to existing buildings within the Green Belt	1
OL4: Local Green Spaces (LGS)	6
OL5: Protecting Dark Skies and Tranquillity	3
General Addressing the Biodiversity Emergency	4
N1: Protecting Nature	5
N2: Restoring Nature	7
N3: Enhancing Green Infrastructure (GI) through development	12
N4: Trees	4
General Historic Environment	3
HE1: The Historic Environment	3
HE2: Securing the Preservation and Enhancement of Oldham's Heritage Assets	2

Local Plan Policy / Topic / Chapter	Total Number of Representations Received
HE3: Development Proposals Affecting Conservation Areas	2
HE4: Oldham's Mills	3
HE5: Canals	3
General Achieving High Quality Design	1
D1: Achieving High Quality Design	15
D2: Advertisements, Signage and Shop Fronts	2
D3: Creating a Better Public Realm in Oldham	2
D4: Extensions and alterations to, and development within the curtilage of, a dwellinghouse	2
General A Sustainable, Active, Accessible Network for Oldham	2
T1: Delivering Oldham's Transport Priorities	6
T2: Travel Hubs and Park and Ride Facilities	3
T3: Parking Provision	3
T4: Electric Vehicle Charging Infrastructure	4
T5: Vision-led Transport Statements, Transport Assessments and Travel Plans in New Development	2
CO1: The Protection of Open Space, Sport and Recreation Provision	5
CO2: New and Improved Open Space, Sport and Recreation Provision	3
CO3: Community Facilities	4
CO4: Education and Skills	2
CO5: Securing Educational Places through New Residential Development	4
CO6: New Development and Health	8
CO7: Hot Food Takeaways and Fast-food Outlets	2
LE1: Ensuring a High Standard of Amenity in New Development	2
LE2: Ground Conditions and Contaminated Land	4
LE3: Air Quality	3

Local Plan Policy / Topic / Chapter	Total Number of Representations Received
General Infrastructure and Delivery in Oldham	2
IN1: Digital Infrastructure and Telecommunications	5
IN2: Planning Obligations	15
IN3: Delivering Social Value and Inclusion	4
M1: Monitoring	3
Plan Wide Overarching	36
Habitat Regulations Assessment (HRA)	3
Infrastructure Delivery Plan	3
Topic Papers	1
Strategic Flood Risk Assessment (SFRA)	1
Strategic Housing Land Availability Assessment (SHLAA) and Housing Topic Paper Appendix 1	3
Integrated Assessment	0
Scoping Report Update	0
TOTAL	421

5.10 In addition to comments submitted on the Publication Local Plan and supporting documents, 12 sites were also submitted for consideration as potential development sites (and/ or allocations). However, as set out in paragraph 1.10, allocations for housing and employment development are no longer being proposed.

5.11 Having reviewed the comments submitted as part of the Publication Local Plan consultation, the Council consider that the main issues received are in relation to:

- Plan Period;
- Housing Requirement Methodology;
- Employment Requirement Methodology;
- Lack of Site Allocations;
- Green Belt 'tidy up' Methodology;
- Transport Evidence; and
- Plan Viability.

5.12 A summary of each of the issues raised during the Regulation 19 consultation, including the main issues listed above, and a brief Council response is provided in Table 5 overleaf. The issues are grouped and listed in order of the content of the Publication Plan (i.e. Vision, Plan Objectives, chapter and policy).

5.13 Table 5 does not include a summary of any comments that provided general support or were minor in nature (i.e. grammatical or typographical errors)²⁸. In addition, where similar comments were raised on the same policy, issue or topic, these comments have been combined for conciseness. The full representations to the Regulation 19 consultation are available on the Council's website.

5.14 Where a modification or explicit amendment to the Plan has been proposed this is set out briefly in the table 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.

²⁸ Please note, however, that the representors listed in table 5 relate to all respondents who commented on the policy, including those who provided general support or minor comments.

Table 5: Summary of Issues Raised and Council's Response Pursuant to Regulation 19 / 20

Summary of Comments	Oldham Council Response
Plan Wide Overarching Comments	
Comments received that the plan-period is unsound and requests that the Local Plan period should run until 2042 as a minimum i.e. the minimum 15-year period.	NPPF paragraph 21 requires that strategic policies look ahead a minimum of 15 years from adoption. The Oldham Local Plan: Publication Plan does not contain strategic policies. For the purposes of the Oldham Local Plan, strategic policies are set out in Places for Everyone (PfE). The PfE plan period is 2022-2039. PfE was adopted in March 2024 and therefore looked ahead for over 15 years from adoption. The Oldham Local Plan provides the non-strategic policies (with a focus on 'development-management' policies) that support the strategic policies in PfE, whilst ensuring that together they reflect, and support delivery of, the Council's priorities and those of our Building a Better Oldham regeneration ambitions. Furthermore, since preparation of the Draft Local Plan changes in national planning policy have taken place and new-style plan making system introduced. The Council is aware that at some point in the future a new-style plan will need to be prepared. When prepared this will need to include strategic and non-strategic policies. In the circumstances it is therefore considered that a plan period of 2022-2039, which reflects that of PfE, is acceptable and appropriate.
Comments received that the plan should include site allocations, including releasing appropriate Green Belt sites where necessary.	The Oldham Local Plan does not include site allocations as its focus is on 'non-strategic' development management policies as a 'part 2' plan to PfE. Oldham's identified land supply (including Strategic Allocations allocated within PfE) is capable of meeting our requirements for housing and employment over the plan period. Further site allocations are therefore not considered to be necessary as part of the Oldham Local Plan. In terms of Green Belt sites, the Local Plan does not address strategic Green Belt boundary revisions as this has been carried out within PfE. However, in line with national planning policy

Summary of Comments	Oldham Council Response
	Green Belt sites can still come forward for development where they comply with the criteria in national planning policy and relevant local planning policy. Further justification for not including site allocations is set out in the Publication Plan Setting the Scene Topic Paper (see sections 6 and 7).
Comments received that the documents are voluminous and should be reduced in content, simplified and advertised/publicised what it is about.	The Local Plan is a planning document which aims to guide development of the borough. As such, a level of technical detail is important so that the plan can be used effectively in the planning process. Communications regarding the Plan have sought to be as simple and concise as possible. Several summary/ guidance documents have been produced and are available online including Frequently Asked Questions, Integrated Assessment Non-Technical Summary and Representation Form Guidance Notes. Moreover, to assist in making representations or to discuss the Plan, appointments with planning officers were offered (as publicised on the Publication Plan web page).
Home Builders Federation (012): it is clear the Council is intending to use the transitional arrangements and submit its Local Plan for examination under the current plan-making regime. Annex A of the draft NPPF outlines that the Local Plan will 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 redundant as soon as the Local Plan is adopted.	PfE is the 'parent' plan and was examined under the December 2021 Framework, therefore in preparing the Oldham Local Plan consideration has been given to that version of the Framework. We have however, sought to ensure that wherever appropriate policies within the Oldham Local Plan: Publication Plan accord with NPPF 2024, as the most recent planning policy published, to ensure longevity over the plan period. References made to national planning policy within the Plan, and associated supporting documents, are therefore to NPPF 2024 unless otherwise stated. Whilst Annex A (paragraph 2) of the Draft NPPF 2025 states that 'Development plan policies which are in any way inconsistent with the national decision-making policies in this Framework should be given very limited weight...', it also goes on to say that 'Other development plan policies[77] should not be given reduced weight simply because they were adopted prior to the publication of this Framework.'

Summary of Comments	Oldham Council Response
	Paragraph 8 then goes onto explain that 'Any other plans being prepared should be produced in accordance with the version of this Framework published in December 2024, unless any of the transitional arrangements in Annex 1 to that Framework apply (in which case those transitional arrangements continue to apply).' The transitional arrangements referred to apply to this Local Plan.
Saddleworth Parish Council (018): it is unclear whether references made to "Oldham" throughout the plan are referring to the borough or to the town. Request that the strapline at the bottom of each page includes reference to relevant Neighbourhood Plans. In addition, concerns expressed about the way that the Local Plan often treats the borough as a more singular area than is the case, care is needed to ensure that universal statements are not made that would not apply to the whole borough. Comments that there is an extensive focus on Oldham Town Centre and very little content on rural centres. Comment that policies map is impossible to use and lack of detail on maps included within the appendices.	Generally, the use of 'Oldham' refers to the whole borough. Where reference is being made to the town centre, the term 'Oldham Town Centre' is used. Paragraph 1.3 of the Publication Plan sets out that upon adoption the Oldham Local Plan will sit alongside the Places for Everyone Joint Plan (PfE) as part of a suite of documents that form the development plan for the borough that also includes the Greater Manchester Joint Waste Development Plan Document (adopted April 2012) and the Greater Manchester Joint Minerals Development Plan Document (adopted April 2013). As well as any neighbourhood plans that may come into force during the lifetime of the Plan. This is then reiterated at paragraph 4.1. The Oldham Town Centre chapter sets out how the Local Plan will support delivery of the Oldham Town Centre Development Framework and the Council's regeneration ambitions for this part of the borough. Policy C1 provides policy for the promotion and enhancement of the borough's centres and sets out our retail hierarchy, which is made up of Oldham Town Centre, the borough's designated' centres (including Lees and Uppermill) and local shopping parades. The plan recognises that centres are an important contributor to local identity and that local shopping parades provide an essential service for residents in more rural areas. Comments on Policies Map noted.

Summary of Comments	Oldham Council Response
Chorlton Planning (019): the Local Plan should give more weight to the growing tourism industry across Oldham.	With regards to tourism, it is considered that policies within the Local Plan, together with PfE and national planning policy, provide an appropriate basis to consider and respond to local circumstances and needs.
Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025): 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.	As set out in Chapter 2 of the Plan (paragraph 2.3), the purpose and role of the Oldham Local Plan is to support delivery of PfE in Oldham. Providing more detailed non-strategic 'development management' policies that support the strategic policies in PfE, whilst ensuring that together they reflect, and support delivery of, the Council's priorities and those of our Building a Better Oldham regeneration ambitions. It is therefore important that policies contained within the Oldham Local Plan are read alongside those in PfE, to ensure that all policy requirements are understood and met. Therefore, given the policy framework it is considered that the Plan sufficiently supports the delivery of the PfE strategic allocations.
Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030): the Local Plan fails to maximise the contribution of suitable brownfield land to housing delivery.	Policy H1 sets out that 'proposals for the development of previously developed land will be considered favourably.' In addition, paragraph 8.8 of the policy reasoned justification also encourages the development of brownfield land and sets out the importance of brownfield land in the housing land supply. As such the Plan supports the delivery of brownfield land, including on sites in other uses currently, where the proposed development would be in line with other relevant policies (as set out in Policy H1).
<i>Representations from: David John Moore (005), Emery Planning - on behalf Mr J Jaskolka (006), United Utilities (007), Stuart Beesley (008), Historic England (011), Home Builders Federation (012), Saddleworth Parish Council (018), Chorlton Planning (019), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026), Grasscroft de Greenfield Ltd (028 and 029), CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030), Prestigious Homes North West (031) and Andy Hulme (032), Taylor Wimpey (033), Depol on behalf of Rowland Homes Ltd</i>	

Summary of Comments	Oldham Council Response
<i>(035), Environment Agency (037), Elizabeth Gartside (039), Lichfields on behalf of Russell LDP (042), Pegasus Group on behalf of DWFCO (043).</i>	
Spatial Portrait	
Canal & River Trust (003): reference should be made to active travel networks for walking and cycling in the borough, including towpaths.	Paragraph 5.29 states that 'Oldham has an extensive walking and cycling network, including a Public Rights of Way (PRoW) network that covers around 450km and towpaths.'
Saddleworth Parish Council (018): request that spatial portrait identifies the issues / characteristics of individual districts rather than presenting information at a borough-wide level. Emphasis on conservation of Oldham Town Centre, and a lack of balance with historic environment and conservation areas across the borough.	It is considered that the spatial portrait appropriately presents the key issues / characteristics of the borough, providing information at a district level on a range of matters, including the natural environment, transport, green infrastructure and tourist destinations.
<i>Representations from: Lancashire Wildlife Trust (002), Canal & River Trust (003), Historic England (011), Saddleworth Parish Council (018)</i>	
Vision	
Saddleworth Parish Council (018): request that village centres are recognised, especially those in Saddleworth.	The vision makes reference to the borough's designated centres, including Lees and Uppermill.
Home Builders Federation (012): request reference is made, alongside utilising sustainable locations, to new homes being delivered where need is located.	The vision aims to ensure that Oldham will have quality homes for everyone that meet the needs of our residents – this includes ensuring new homes are delivered where they are needed.
<i>Representations from: Lancashire Wildlife Trust (002), United Utilities (007), Historic England (011), Home Builders Federation (012), Saddleworth Parish Council (018)</i>	

Summary of Comments	Oldham Council Response
Plan Objectives	
Saddleworth Parish Council (018): ask for reference to social housing in PO1, likely opportunities for growth in Saddleworth and elsewhere (including home-working, services, tourism, commuting) in PO3, a stronger emphasis placed on solving existing problems in PO7 and a commitment to carrying out an assessment on the borough's conservation areas in PO9 be included.	PO1 refers to the delivery of a diverse housing offer to meet the needs of all our residents. This includes affordable housing which encompasses social housing. PO3 appropriately and succinctly support access to employment opportunities and growing local businesses. PO7 appropriately recognises existing problems, and PO9 refers to conserving and enhancing the borough's historic environment.
<i>Representations from: Lancashire Wildlife Trust (002), United Utilities (007), Historic England (011), Saddleworth Parish Council (018)</i>	
Key Diagram	
Canal & River Trust (003): suggest Key Diagram is amended to show canals.	Canals are identified on the Key Diagram on page 27 of the Plan.
Saddleworth Parish Council (018): as illustrated the key diagram is unclear and house symbols could be taken as the exact locations for future growth. Suggests that an accompanying table would better reflect this information.	Future housing development icon is illustrative only, as referred to in the asterix ** at the bottom left of the Key Diagram.
<i>Representations from: Canal & River Trust (003), Saddleworth Parish Council (018)</i>	
Homes	
General	
Emery Planning - on behalf Mr J Jaskolka (006): request modification to the Plan to include an 'exception policy' to boost affordable housing beyond what may be delivered through Policy H1 and Policy H5.	Exception sites for affordable housing are able to come forward in line with NPPF, and other local plan policies.

Summary of Comments	Oldham Council Response
Saddleworth Parish Council (018): suggest paragraph 8.3 be modified to reflect the needs of different areas, as follows: "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>. There is are also increasing numbers of people at risk of, or currently experiencing, homelessness in the borough. In addition, tThere is also 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 also <u>specific issues which affect of overcrowding</u> in some of Oldham's neighbourhoods, <u>which include overcrowding</u>, an increased need for larger inter-generational family housing, and an increasing ageing population and a need for housing suitable for disabled people." <i>Representations from: Emery Planning - on behalf Mr J Jaskolka (006), Saddleworth Parish Council (018)</i>	Proposed modification noted. Paragraph 8.3 provides a summary of the Local Housing Needs Assessment (LHNA). Further detailed evidence, including area considerations, is set out in the full LHNA document.
Policy H1 Delivering a Diverse and Sustainable Housing Offer	
Comments received that the plan 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. Requests that the housing requirement for the emerging Local Plan reflects the latest standard method figure to ensure that the Plan is positively prepared and reflects National Planning Policy Guidance.	The Oldham Local Plan is a 'part 2' plan to the strategic policies in PfE, Policy H1 therefore reflects JP-H1's housing requirement for Oldham over the plan period (2022-2039). This was calculated using the government's standard methodology in place at the time the plan was prepared, as was set out in NPPF (December 2020). In line with the transitional arrangements set out in paragraphs 234c and 235 of NPPF 2024, it is appropriate to use the PfE housing requirement for the Oldham Local Plan.

Summary of Comments	Oldham Council Response
The application of Greater Manchester Accessibility Level (GMAL) level 4 is restrictive. In addition to the PfE allocations, of the sites identified in the Housing Topic Paper, 34 have GMAL scores of 3 or under. Yet they are still considered as sufficiently sustainable and accessible locations for residential development. 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.	The policy allows for GMAL level 4 (and above) not to be met where it can be demonstrated that it is not appropriate or the development provides exceptional benefits to surrounding community and environment. As such it is considered that sufficient flexibility is provided to allow development to come forward in locations that would otherwise be suitable or could be made suitable by improvements to public transport or active travel.
The Local Plan fails to meet NPPF paragraph 69 requirements in relation to a deliverable supply. Evidence within the Council's own documentation suggests that delivery in later years of the Plan will increasingly rely on uncertain sources of supply. There is insufficient certainty that housing delivery will be achieved over the plan period.	The identified housing land supply (set out in Appendix 1 of the Housing Topic Paper and the Strategic Housing Land Availability Assessment (2025)) has been prepared in line with NPPF and identifies a sufficient supply and mix of sites which are and suitable, available, achievable. The Housing Topic Paper provides evidence and explains that the identified housing land supply is sufficient to meet our housing requirement, as set out in H1, over the plan period, as required by NPPF paragraph 69.
Ashton Hale on behalf of Prestigious Homes North West (031) and Andy Hulme (032): plan should 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>	Proposed modification noted. Please see response at plan wide section to comment regarding the need to allocate sites (including Green Belt release) on pages 36-37 above.
<i>Representations from: Emery Planning on behalf of: Oakmere Homes Ltd (001), Mr J Jaskolka (006), Mr Lumb (013), Sheridan Group (014) and Redwaters Estates (016), United Utilities (007), Home Builders Federation (012), Saddleworth Parish Council (018), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026), Grasscroft de Greenfield Ltd (028 and 029), CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell</i>	

Summary of Comments	Oldham Council Response
(030), Prestigious Homes North West (031) and Andy Hulme (032), Taylor Wimpey (033), Depol on behalf of Rowland Homes Ltd (035), HK Planning on behalf of Unearthed Land (036) and Pegasus Group on behalf of DWFCO (043).	
Policy H2 Density of New Housing	
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. CPRE (044) 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> "	Proposed modification noted. The policy aims to make the most efficient use of land. The residential density requirements set out in Policy H2 are <i>minimum</i> figures. As such, higher densities are welcomed where the proposed development is in accordance with other relevant policies and no change is considered necessary.
It is not apparent from the evidence base the degree to which the approach to density relates 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. All of which will impact upon the density that can be delivered onsite. Also, the policy should reflect the flexibility in the PfE policy JP-H4 which states that development should 'have regard' to the densities set out in the policy.	Exceptions to the density requirements apply as set out in the policy, providing appropriate flexibility. Assessment on a 'site-by-site basis', also ensures that where other policy conflict or site-specific issues can be considered.
Saddleworth Parish Council (018): the policy makes no distinction between urban and rural centres, and there is no reference to village centres outside of Uppermill and asks if full consideration has been given to housing density in other rural centres. Also strongly contest the use of the term "frequent" in relation to train services to Greenfield train station.	Table H2 reflects the retail hierarchy defined in Policy C1. The policy approach allows for exceptions to the minimum densities, such as responding to specific site characteristics, and considered appropriate and proportionate in this context. Comment regarding Greenfield train station noted.

Summary of Comments	Oldham Council Response
Save Royton's Green Belt (022): exceptions need to be supported by evidence to be justified. 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> ."	Proposed modification noted. Paragraph 8.15 of the policy reasoned justification states that exceptions will only be allowed 'where necessary and fully evidenced'.
Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025): the policy could reference that alternative densities will be considered acceptable were identified in endorsed masterplans / Supplementary Planning Documents, or equivalent.	Sufficient flexibility exists within the policy through the stated exceptions and the 'site-by-site' basis for consideration, allowing for consideration of alternative densities where appropriate.
<i>Representations from: Historic England (011), Home Builders Federation (012), Saddleworth Parish Council (018), Save Royton's Green Belt (022), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026), Grasscroft de Greenfield Ltd (028 and 029), CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030), Prestigious Homes North West (031) and Andy Hulme (032), CPRE (044).</i>	
Policy H3 Housing Mix	
It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites, the need to ensure that development remains deliverable, and that housing mix should not be restricted to the mix set out in Table H3	It is considered that the policy contains sufficient flexibility. Table H3 sets out the recommended housing mix', and that an alternative mix may be appropriate (with examples of circumstances listed) and discussed / agreed as part of the pre-application or planning application process.
United Utilities (007): 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> "	Proposed modification noted. It is considered that Policy CC3 provides sufficient policy to ensure that foul, surface water and clean water are dealt with appropriately as part of development.

Summary of Comments	Oldham Council Response
Home Builders Federation (012): a more flexible approach should be taken regarding housing mix which recognises that: needs and demands will vary by area and site; to ensure scheme viability; and provide an appropriate mix for the location and market. PfE Policy JP-H3 requires all new homes to be built to M4(2) standard which includes step-free level access and adaptable homes, a separate requirement is therefore unjustified and superfluous. Unclear how the requirement for bungalow provision at the levels required can be met whilst also fulfilling Policy H2.	Table H3 is a 'recommended' housing mix, informed by the LHNA. The policy is clear that alternative mixes may be acceptable, including in the circumstances listed in the policy. Housing developments can, and should, include a mix of house types and sizes – achieving density requirements by providing higher density house types, as well as including some lower density house types like bungalows. Furthermore, the recommended mix in table H3 is for 'bungalows/ level-access homes', which could include higher-density apartments, whilst the exceptions in Policy H2 would also apply.
Saddleworth Parish Council (018): title of the policy should be amended to "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. 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.	The policy title appropriately reflects the policy content. Table H2 provides a 'recommended' housing mix, rather than being prescriptive mix. Paragraph 8.18 of the policy reasoned justification points to Table 5.2 of the LHNA which provides a further breakdown of the recommended housing mix for each tenure by district and Oldham Town Centre. Policy is considered appropriate and sufficiently flexible to allow for different housing mixes for different locations within the borough, in line with the evidence base.
Save Royton's Green Belt (022): 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> There 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."	Proposed modification noted. As stated in Policy H3, alternative housing mix for development should be agreed with the Council at the earliest opportunity, ideally through seeking pre-application advice, this will include consideration of supporting evidence, including the LHNA.

Summary of Comments	Oldham Council Response
Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025): criterion 2 should list viability as one of the 'distinct characteristics' as 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, flexibility will be key.	This is not necessary as viability can be a consequence of site characteristics, or of some of the other circumstances listed in the policy where an alternative mix might be acceptable. The policy is considered sufficiently flexible in this regard.
Taylor Wimpey (033): concern with the ranges provided in Table H3. Additional flexibility should be provided to allow consideration of site-specific matters.	Table H3 is a 'recommended' housing mix, the policy is clear that alternative mixes may be acceptable, including in the circumstances listed in the policy, such as to consider site specific characteristics (circumstance 2).
<i>Representations from: United Utilities (007), Home Builders Federation (012), Saddleworth Parish Council (018), Save Royton's Green Belt (022), The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026), Grasscroft de Greenfield Ltd (028 and 029), CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030), Prestigious Homes North West (031) and Andy Hulme (032), Taylor Wimpey (033).</i>	
Policy H4 Providing for Local Housing Needs	
Emery Planning on behalf of Redwaters Estates (016): the inclusion of an 'exception policy' to boost affordable housing above and beyond what can be anticipated through Policy H1.	It is not considered necessary for the Plan to include an exception policy, as exception sites for affordable housing can still come forward in line with NPPF, and other local plan policies.
Home Builders Federation (012): it is not clear from the Viability Assessment if the viability in relation to housing for older people has been considered. Also state that the reasoned justification identifies a requirement for 5% of new dwellings to be built to M4(3) wheelchair	The policy supports the delivery of housing which is suitable for older people but it does not set out a requirement. The Local Plan Viability Assessment has assessed a range of typologies for residential development, including a mix of house types (housing/ flats), number of units and densities. The typologies have been informed by local evidence (including the Local Housing Needs Assessment (2024));

Summary of Comments	Oldham Council Response
accessible standard – clarification on this is sought as not translated into policy wording.	has assumed that all typologies meet or exceed the NDSS; and consider policy H3 'Housing Mix' and requirements for M4(2) (and M4(3)). The assumptions are set out in Appendix 2 of the Assessment. As such, the typologies assessed could include housing, which is suitable for older people, i.e. level access housing. The policy reasoned justification (paragraph 8.36) discusses the evidence base findings. It sets out that 'the LHNA has identified a need for 5% of new dwellings to be built to the M4(3) wheelchair accessible standard (an average target of around 34 per year over the plan period).' It does not set out a requirement which is why this isn't included within the policy text.
Saddleworth Parish Council (018): the title of the policy could reflect the specific needs.	It is considered that this change is not necessary for soundness.
Greater Manchester Coalition of Disabled People (027): it is disappointing 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 when it is considered 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.	The policy reasoned justification (paragraph 8.36) discusses the evidence base findings. It sets out that 'the LHNA has identified a need for 5% of new dwellings to be built to the M4(3) wheelchair accessible standard (an average target of around 34 per year over the plan period).' It does not set out a requirement for M4(3). However, the policy does support the provision of specialist housing provision in general which could include dwellings built to M4(3) standard.
<i>Representations from: Home Builders Federation (012), Emery Planning on behalf of Redwaters Estates (016), Saddleworth Parish Council (018), Greater Manchester Coalition of Disabled People (027)</i>	
Policy H5 Affordable Housing	
The LHNA identifies an affordable housing need of 669 a year. The overall PfE housing requirement for the borough is only marginally above this. This illustrates the need for affordable housing and the need for aligning the housing requirement with the latest standard	The overall housing requirement is appropriate for the Plan, given that it is a 'part 2' plan to PfE and in line with the transitional arrangements set out in paragraphs 234c and 235 of NPPF. Planning Practice Guidance is clear that affordable housing need does not have to be

Summary of Comments	Oldham Council Response
method figure for the borough. The number of affordable homes planned to be delivered is capped due to viability challenges apparent across the borough, as evidenced by the Local Plan Viability Assessment. Issue further compounded by the policy not including an option to negotiate affordable housing requirements where it would not be viable to provide a policy compliant amount - this needs to be included to be effective.	fully met by the planning system. Viability may be challenging in areas of the borough. However, affordable homes continue to be delivered in Oldham at levels higher than policy requirements (and for 100% affordable housing schemes) supported by funding programmes and Registered Providers. Paragraph 8.70 of the policy reasoned justification states 'where necessary and fully evidenced, exceptions to providing the full amount of affordable housing may apply'. Whilst Policy IN2 allows for viability issues to be considered on a site-specific basis where change in circumstance is evidenced which could not have been foreseen Local Plan Viability Assessment, in line with NPPF and PPG.
The Council should explore 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.	Planning Practice Guidance is clear that affordable housing need does not have to be fully met by the planning system. In any case, it is not considered necessary for the Plan to include an exception policy, as exception sites for affordable housing can still come forward in line with NPPF, and other local plan policies.
Flexibility is important to ensure that development remains viable and deliverable across all sites. Flexibility required regarding the split in affordable tenures, to account for site specific viability considerations and in the event that a Registered Provider not identified to take the social rented or affordable rented properties.	This is noted. It is considered that sufficient flexibility exists within the policy and other relevant local plan policies (such as IN2) to ensure development is deliverable. The policy includes exemptions to the tenure mix as set out, requiring the applicant to evidence an alternative tenure split (or mix), considering local affordable housing needs, and for this to be agreed with the Council at planning application stage. Further flexibility is provided through Policy IN2 (see response above also) and early discussions with the Council and registered providers are encouraged (see paragraph 8.65).
As there is no longer a mandatory requirement for First Homes in NPPF, clarity is sought on whether the Council will still be requesting this (the LHNA assumes that the affordable home ownership will include First Homes).	Paragraph 66 (footnote 31) of NPPF (2024) states that the delivery of First Homes can continue where local planning authorities judge that they meet local need. The LHNA set out that affordable home ownership 'could' include First Homes but does not state that it should exclusively include First Homes. As such, affordable home ownership can also include other products (as defined in NPPF Annex 2:

Summary of Comments	Oldham Council Response
	Glossary). In this context, the tenure split set out in the policy is considered to be reasonable in line with evidence base.
Save Royton's Green Belt (022): concerned 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 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".	Table H4 sets out that brownfield land (in high, medium and low value areas) may be more difficult/ less viable to develop than greenfield land and therefore has a lower affordable housing requirement. However, given the level of affordable housing need even in medium and low value areas it is still considered appropriate to seek a minimum amount of affordable housing as part of new development.
The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023): the Oldham Local Plan Viability Assessment has not tested specialist housing for older people as a typology, which are likely to be less viable. Recommend typology is tested and text added to the policy providing an exemption for specialist housing for older people. Recommend that point b is amended as follows: "b) that provide specialist housing to meet local housing needs "	Proposed modification noted. See response to Policy H4 - Home Builders Federation (012) regarding viability at pages 47- 48 above.
<i>Representations from: Emery Planning on behalf of: Mr J Jaskolka (006) and Redwaters Estates (016), Home Builders Federation (012), Saddleworth Parish Council (018), Save Royton's Green Belt (022), The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026), Grasscroft de Greenfield Ltd (028 and 029) CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030), Prestigious Homes North West (031) and Andy Hulme (032), Taylor Wimpey (033).</i>	

Summary of Comments	Oldham Council Response
Policy H6 Houses in Multiple Occupation	
Saddleworth Parish Council (018): question reference made to different housing markets for HMOs as no breakdown provided, and if policy should be amended to reflect the development of HMOs to serve specific markets. Definition of a HMO should be included in the policy.	The policy reasoned justification recognises that HMOs serve several housing need groups (see paragraph 8.75). Needs will also differ across the borough, as per the evidence base. However, the policy is considered effective and proportionate for managing the development of HMOs across the borough. Definition included in reasoned justification reflects that set out by the government and used for planning purposes.
Save Royton's Green Belt (022): 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: "2. <u>It can be clearly evidenced it</u> does not result in an undue concentration of HMO provision in any particular area of the borough.' 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: <u>'3. Ensures:</u> <u>a) that no two adjacent properties apart from those that are separated by a road are converted to HMOs, and</u> <u>b) that a residential property is not sandwiched by two HMOs:'</u> 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>	Proposed modifications noted. As per paragraph 8.77 of the policy reasoned justification applications for HMOs should include an assessment of the existing concentration as per the criteria listed in the policy and provide this as part of their planning application. GIS and other desktop assessment tools will be utilised in assessing the information provided. Regarding criterion 3, it is considered that the policy wording as whole is sufficient to ensure this can be avoided where necessary. All new residential development would need to accord with Policy H3.
<i>Representations from: Saddleworth Parish Council (018), Save Royton's Green Belt (022)</i>	

Summary of Comments	Oldham Council Response
Policy H7 Gypsies, Travellers and Travelling Showpeople	
<i>Representation from: Historic England (011)</i>	
Economy and Employment	
General	
Saddleworth Parish Council (018): there is a lack of references in this section to farmland and agriculture. 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, there is no reference to home working so one of the policies in this chapter should be amended to reference home working.	With regards to farming and agriculture, it is considered that policies within the Local Plan, together with national planning policy, provide an appropriate basis to consider and respond to local circumstances and needs.
<i>Representations from: Historic England (011), Saddleworth Parish Council (018)</i>	
Policy E1 Employment and Floorspace Requirements	
Comments received criticising the methodology used to calculate the employment land requirements. Comments include that the approach taken in the policy is not aligned with PfE, does not appear to be based on a consistently applied or clearly justified evidence base and invokes an unnecessary mathematical calculation and conflates two distinct concepts. 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, and as such, they do not provide an up to date or policy led assessment of future employment land needs, and their continued reliance raises	Proposed modification noted. There is a need to ensure Oldham contributes to the employment floorspace requirements set out in PfE and a policy setting out Oldham's requirement is considered the most effective way in which to demonstrate this. There is no prescribed methodology for identifying employment land requirements, the methodology used to inform Policy E1, is that which was put forward by the nine PfE districts through main modifications proposed during the examination of the plan ²⁹ . The methodology is set out in the reasoned justification and in the Economy and Employment Topic Paper. In the absence of a prescribed methodology for identifying employment land requirements, this is considered an appropriate

²⁹ This document can be found at: [Proposed-PfE-employment-land-requirement-calculation_Nov2022-1.pdf](#)

Summary of Comments	Oldham Council Response
concerns regarding the Plan's evidential accuracy and consistency. In addition, Save Royton's Green Belt (022): request policy wording replaced with: <u>"To contribute towards achieving the overall employment floorspace requirements set out in PfE policies JP-J3 and JP-J4, ensure the following:</u> <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> <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>	strategy for ensuring and monitoring that Oldham contributes to the employment floorspace requirements set out in PfE.
Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025): it is important that the floorspace targets set out within the policy are recognised as minimum requirements over the plan period.	Policy E1 states that Oldham will achieve 'at least' the floorspace figures that are set out, recognising them as minimum requirements.
Saddleworth Parish Council (018): 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.	Proposed modification noted.
Lichfields on behalf of Russell LDP (042): the employment floorspace requirements 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. Therefore, 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	See response set out in the Plan Wide Overarching section in relation to the plan period. The Local Plan should be read in conjunction with PfE in which Stakehill is a cross-boundary allocation with Rochdale (JPA2). The Local Plan is not allocating sites however the PfE Strategic Allocations are included on the Local Plan Policies map and referenced in paragraph 2.2 and 9.5 and Stakehill forms part of Oldham's employment land supply.

Summary of Comments	Oldham Council Response
identify additional land, over and extended plan period, is not exacerbated further.	
<i>Representations from: Saddleworth Parish Council (018), Save Royton's Green Belt (022), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026) and CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell, Lichfields on behalf of Russell LDP (042).</i>	
Policy E2 Business and Employment Areas	
United Utilities (007): 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:"	Proposed modification noted. Any site-specific issues will be addressed as part of the planning application process.
Fisher German LLP - on behalf of National Grid Electricity Transmission (010): object to the policy as drafted. BEA 3 is crossed by or in close proximity to NGET assets. 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. 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</u>	Proposed modification noted.

Summary of Comments	Oldham Council Response
<u>masterplanning stage and how the impact of the assets has been reduced through good design.”</u>	
Saddleworth Parish Council (018): are all the permitted uses supported in all cases, or should there 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 presented, and if full consideration has been given to whether they should be.	Full consideration has been given to the uses permitted within BEAs and all of the uses are considered appropriate in all the BEAs. Paragraph 9.20 sets out that it may be appropriate to locate some small scale and complementary uses to the employment function within the BEAs, where appropriate, including gyms.
Comments received objecting to sites being included within Business and Employment Areas (BEAs). Saddleworth Property Partnership (026) request a modification to remove their site as a BEA, as follows: “There are 23 <u>22</u> BEAs designated across the borough. These are identified on the Policies Map and set out in Table E1 below. [Removal of BEA 21 Valley Mills from Table E1].” CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030) request a modification to remove their site as a BEA, as follows: “There are 23 <u>22</u> BEAs designated across the borough. These are identified on the Policies Map and set out in Table E1 below. [Removal of BEA 8 Shaw Road from Table E1].”	Proposed modification noted. The policies within the Economy and Employment chapter offer sufficient flexibility that sites within the BEAs can come forward for non-employment generating uses in some circumstances.
Lichfields on behalf of Russell LDP (042): the policy should specifically refer to the PfE allocations including Stakehill Industrial Estate extension site.	The Local Plan should be read in conjunction with PfE in which Stakehill is a cross-boundary Strategic Allocation with Rochdale (JPA2). The Local Plan is not allocating sites however the PfE Strategic Allocations are included on the Local Plan Policies Map and referenced in paragraph 2.2 and 9.5 for completeness.

Summary of Comments	Oldham Council Response
<i>Representations from: United Utilities (007), Fisher German LLP - on behalf of National Grid Electricity Transmission (010) , Saddleworth Parish Council (018), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026) and CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030), Lichfields on behalf of Russell LDP (042).</i>	
Policy E3 Exceptions within Business and Employment Areas	
<i>Representations from: Historic England (011)</i>	
Policy E4 Employment Sites outside of Business and Employment Areas	
<i>Representations from: Historic England (011), Saddleworth Parish Council (018).</i>	
Policy E5 Reuse and redevelopment of Mill Buildings	
Canal & River Trust (003): it is not clear the amount of evidence required for a viability exercise and further detail on the expectations could be provided.	Further text has been added to the reasoned justification since Draft Plan Stage to provide more information on this matter, no further amendments considered necessary.
<i>Representations from: Canal & River Trust (003), Historic England (011).</i>	
Our Centres	
General	
Saddleworth Parish Council (018): there is a failure to address rural centres and the requirements of people living in rural environments	With regards to rural centres and areas it is considered that policies within the Local Plan, together with PfE and national planning policy,

Summary of Comments	Oldham Council Response
	provide an appropriate basis to consider and respond to local circumstances and needs.
<i>Representations from: Saddleworth Parish Council (018).</i>	
Policy C1 Our Centres	
Saddleworth Parish Council (018): the villages across Saddleworth have centres offering services which do not fit within the term “Local Shopping Parades”. Suggest renaming them “Local Service Clusters” and redefine having regard to density of services facilities in an area. Reference required to places where there is sufficient housing density to justify the provision of services, but they are not currently present.	Local Shopping Parades represent convenient facilities that help meet the day-to-day needs of our residents. Such services help reduce the need to travel, provide a focus for community interaction and help to distinguish one area from another. They also provide an essential service for less mobile residents and residents in more rural areas. Further detail is provided at pages 24-25 of the Our Centres Topic Paper. With regards to the provision of new services and facilities it is considered that policies within the Local Plan, together with PfE and national planning policy, provide an appropriate basis to consider and respond to local circumstances and needs.
<i>Representations from: Saddleworth Parish Council (018).</i>	
Policy C2 Protecting the vitality of our centres	
Saddleworth Parish Council (018): 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.	See response to Policy C1 – Saddleworth Parish Council (018) at page 57 above.
Brookhouse Group Ltd (021): the Impact Assessment thresholds included are not appropriate and there is not enough evidence to justify them.	The evidence used to justify the impact assessment thresholds is set out in the Boroughwide Retail and Leisure Study which considered the scale of Oldham Town Centre and its relatively high turnover, its health, high vacancy rate and potential vulnerability to market changes. Taking these issues that into account, the study recommended that the impact threshold for Oldham Town Centre

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	should be set at 1,500m2 gross. The Study went on to conclude that the borough's other centres are considered much more vulnerable to impacts from edge-of-centre and out-of-centre retail proposals and therefore a threshold of 300m2 gross was considered appropriate for those. As such, the thresholds are considered to be justified in line with the evidence.
<i>Representations from: Saddleworth Parish Council (018), Brookhouse Group Ltd (021).</i>	
Policy C3 Changes of use and redevelopment within the borough's centres	
Saddleworth Parish Council (018): 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.	As set out in paragraph 10.20 of the policy reasoned justification applicants for uses that may undermine the role and function of our centres will have to demonstrate in their planning statement that the proposed development meets the four criteria (a to d) set out in the policy.
<i>Representations from: Saddleworth Parish Council (018).</i>	
Policy C4 Local Services and Facilities	
Saddleworth Parish Council (018): reiterate comments made against Policy C1 with reference to Local Shopping Parades. 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.	In relation to Local Shopping Parades see response to Policy C1 – Saddleworth Parish Council (018) at page 57 above. Oldham's centres hierarchy is set out in Policy C1, we do not define rural centres.

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<i>Representations from: Saddleworth Parish Council (018), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025).</i>	
Oldham Town Centre	
Policy OTC1 Oldham Town Centre	
United Utilities (007): UU will undertake a high-level review of the sites outlined in paragraph 11.11 and provide any comments / concerns for inclusion within evidence base.	Noted.
Stuart Beesley (008): would like to see the Civic Centre buildings retained and reused.	Policy approach has been informed by the Oldham Town Centre Development Framework, which was subject to consultation in Summer 2024 and approved November 2024. Regarding the retention and re-use of the civic centre building - planning permission has recently been granted for the redevelopment of the Civic Centre site for residential and mixed-use development (OUT/354338/25) and the change of use and conversion of the Civic Centre Tower to a Hotel (FUL/354322/25).
<i>Representations from: United Utilities (007), Stuart Beesley (008), Historic England (011), Theatres Trust (038).</i>	
Policy OTC2 Protecting and Enhancing Oldham Town Centre Conservation Area	
<i>Representation from: Historic England (011).</i>	
Policy OTC3 Creating a Better Public Realm for Oldham Town Centre	
United Utilities (007): 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</u>	Proposed modification noted. Criterion 4 requires 'the introduction of trees and landscaping (supported by a management scheme) in appropriate locations to create a greener, cooler and biodiverse town

Summary of Comments	Oldham Council Response
the start of the design process to ensure that space is made for the SuDS.” Some suggested text for the Reasoned justification is also included.	centre with the delivery of sustainable drainage solutions where appropriate’. In addition, Policy CC3 of the Plan sets out policy for sustainable drainage.
<i>Representations from: United Utilities (007), Historic England (011).</i>	
Policy OTC4 Green Infrastructure within and around Oldham Town Centre	
United Utilities (007): 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.”	Proposed modification noted. It is considered that the existing wording of paragraph 11.30 which refers to ‘managing surface water’ is sufficient in this regard.
<i>Representations from: Lancashire Wildlife Trust (002), United Utilities (007), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026) and CRJ Trustees Ltd, Lee Tilley, Christine Tilley, and Alan Rothwell (030), Prestigious Homes North West (031) and Andy Hulme (032).</i>	
Addressing Climate Change	
General	
Canal & River Trust (003): request paragraph 12.10 be expanded to include the mention of water resources.	This paragraph is referring to the Local Area Energy Plan (LAEP). The LAEP does not refer to water resources. Water resources are considered in this chapter elsewhere.
Environment Agency (037): 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	Proposed modification noted. Policy CC2 sets out our approach to managing flood risk alongside PfE.

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and, where possible, reduce storm and flood risks, reduce overheating and water scarcity, minimise vulnerability and improve resilience, and support renewable and low carbon energy and associated infrastructure.”	
<i>Representations from: Lancashire Wildlife Trust (002), Canal & River Trust (003), Saddleworth Parish Council (018), Environment Agency (037).</i>	
Policy CC1 Renewable and Low Carbon Energy	
Lancashire Wildlife Trust (002): 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.	Policy N1 sets out the borough’s hierarchy for designated sites and wider ecological networks, stating that these will be safeguarded in line with national policy. This includes peat which is capable for restoration to support notable habitats. Further detail is given at paragraphs 14.20-14.21 of the policy reasoned justification.
United Utilities (007): request the following minor amendment to this policy: “9. Flood Risk, hydrology, <u>water quality, and the impact on water supply resources</u> , and water catchment land;”	Proposed modification noted.
Saddleworth Parish Council (018): Policy 5 of the Saddleworth Neighbourhood Plan (Character and quality of land adjacent to the National Park) defines an indicative area for considering the impact on setting, and complements Policy CC1. Reference should be added as a footnote in relation to Saddleworth Neighbourhood Plan to criterion 13.	Upon adoption Saddleworth Neighbourhood Plan will form part of the development plan for the borough and considered in the determination of relevant planning applications.
Save Royton’s Green Belt (022): concerned 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). Modification proposed to criterion 6: “The openness of the Green Belt and whether very special circumstances have been demonstrated to justify otherwise inappropriate development, and any	Proposed modification noted. The policy wording is in line with NPPF paragraph 160 which states that ‘developers will need to demonstrate very special circumstances.’ NPPF does not say ‘evidenced’, however, to demonstrate that very special circumstances exist it is assumed that evidence will be provided to support this. Furthermore, paragraph 12.11 of the policy reasoned justification states that ‘the Council will support proposals for renewable energy providing that any

Summary of Comments	Oldham Council Response
<u>technical reasons that are advanced as part of the reasoning for building in the Green Belt must have been clearly evidenced;</u> "	environmental and social aspects are appropriately addressed including...Green Belt'. As such it is considered that the policy wording is sufficient and in line with NPPF.
Environment Agency (037): 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. 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 <u>assessment to demonstrate the planning application is within compliance with the water framework directive.</u> "	Proposed modification noted.
<i>Representations from: Lancashire Wildlife Trust (002), United Utilities (007), Historic England (011), Manchester Airport Group (015), Saddleworth Parish Council (018), Save Royton's Green Belt (022), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025) and Grasscroft de Greenfield Ltd (028 and 029), Environment Agency (037).</i>	
Policy CC2 Managing Flood Risk	
United Utilities (007): recognise importance of ensuring that SFRA is regularly updated and 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.	Noted.

Summary of Comments	Oldham Council Response
Saddleworth Parish Council (018): lack of quality information on many locations of culverts, drains and sewers, particularly in Saddleworth, which could be reflected in the policy or reasoned justification. Section is a clear example of potential difficulties for people using the Local Plan and the Policy Map.	Policy wording is considered to include an appropriate level of information. Comments on policies map noted.
Save Royton's Green Belt (022): this 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. Also proposes a modification to criterion D as follows: "The development will not increase flood risk elsewhere, <u>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>"	Proposed modification noted. The policy brings together local requirements, for example FRA required for developments over 0.5 ha within a CDA and where at risk from other sources such as Canal Hazard Zones, and national policy into one policy for clarity. The policy has been informed by the GM SFRA Level 1 and criterion d is consistent with the GM SFRA Level 1 Policy Recommendation 8. The Environment Agency review FRAs to check they are satisfactory, including that flood risk is not increased elsewhere. National guidance on flood risk sets out more detailed information.
Environment Agency (037): 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: "A site-specific Flood Risk Assessment (FRA) is required where a site is: 1. Within Flood Zone 3a or Flood Zone 2;"	Proposed modification noted.
<i>Representations from: Lancashire Wildlife Trust (002), Canal & River Trust (003), United Utilities (007), Saddleworth Parish Council (018), Save Royton's Green Belt (022), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025), Environment Agency (037).</i>	

Summary of Comments	Oldham Council Response
Policy CC3 Sustainable Drainage – Foul and Surface Water	
Canal & River Trust (003): the detail in paragraph 12.41 would be more effective through highlighting this to prospective developers and decision makers when designing surface water drainage.	Noted.
United Utilities (007): suggest amendments to the policy based on paragraph 182 of NPPF: “Applications for major development <u>which could affect drainage on or around the site</u> will be supported...” Also in relation to watercourse maintenance, request the following amendment to this policy: “Applications are required to be accompanied by drainage management and maintenance plans, having regard to <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.” Comments made on paragraph 12.38 regarding right to connect to the public sewer. 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.	Proposed modifications noted.
Save Royton’s Green Belt (022): drainage strategies should consider the timing and routing of flows, to support the effective implementation of the policy. Suggest insertion of new paragraph in the policy between current paragraph’s 5 and 6: “<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>”	Proposed modification noted.

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Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025): it should 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. Suggest that the policy should be reworded to reflect this, adding flexibility.	Policy is consistent with PfE Policy JP-S4 criterion 5.
Lichfields on behalf of Russells LDP (042): question need for policy as largely duplicates existing national policy and guidance with no clear evidence for repeating or restating.	The policy has been developed through working in partnership with statutory consultees. Detail on drainage expectations and standards is considered locally specific.
<i>Representations from: Lancashire Wildlife Trust (002), Canal & River Trust (003), United Utilities (007), Saddleworth Parish Council (018), Save Royton's Green Belt (022), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025), Lichfields on behalf of Russells LDP (042).</i>	
Policy CC4 Water Efficiency	
Comments that representors understand the objectives and desirability to move to a tighter water efficiency standard but do not consider that the evidence submitted justifies this in line with the planning practice guidance. Policy must provide greater flexibility to ensure applicants are not burdened with onerous policy requirements.	Approach is based on most recent evidence available and is considered proportionate. Any change in costs since its publication would be limited, given the increased emphasis on design and construction efficiencies in new residential development. Consequently, any adjustment to this allowance would be unlikely to have a material effect on development viability. The costs associated with new water supply connections, sewerage infrastructure, wastewater treatment infrastructure and related utility works are already accounted for within the external works cost allowances in the Viability Assessment.
<i>Representations from: United Utilities (007), Home Builders Federation (012), Lichfields on behalf of Russells LDP (042).</i>	

Summary of Comments	Oldham Council Response
Policy CC5 Groundwater Source Protection Zones	
United Utilities (007): request that the requirement for a management plan should address both construction and the operational life of any development. Suggest the following amendment: “3. Construction Management Plan – a Construction 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 on both groundwater, public water supply and surface water...</u> ”	Proposed modification noted.
Save Royton’s Green Belt (022): criterion 1 should be amended to explicitly require consideration of off-site sources and dynamic pathways. Modification proposed: “1. Risk Assessment - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection, <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> ”	Proposed modification noted. Paragraph 12.60 of the policy reasoned justification sets out information on the source-pathway-receptor approach. This is considered appropriate.
<i>Representations from: Lancashire Wildlife Trust (002), United Utilities (007), Save Royton’s Green Belt (022).</i>	
Natural Environment and Open Land	
Policy OL1 Consideration for the Peak District National Park	
Saddleworth Parish Council (018): 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> ”	Proposed modification noted. Policy OL1 states that development within the planning boundary of Oldham Borough will be permitted where it does not conflict with the purposes of the Peak District National Park. This is then qualified at paragraph 13.5 of the policy reasoned justification, where reference is made to there being parts of Saddleworth that fall within Oldham Council’s planning boundary may be considered to fall within its setting and contribute to the Peak District National Park’s natural beauty.

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Also suggest that a reference to policy 5 of the Saddleworth Neighbourhood Plan and the accompanying map would be a helpful reference to include.	Upon adoption Saddleworth Neighbourhood Plan will form part of the development plan for the borough and considered in the determination of relevant planning applications.
<i>Representations from: Lancashire Wildlife Trust (002), Saddleworth Parish Council (018).</i>	
Policy OL2 Oldham's Green Belt	
Need for policy questioned as duplicates NPPF. Additional requirements unnecessary and risk being superseded as national planning policy guidance on the Green Belt is amended.	The policy provides additional detail and clarification on elements of national Green Belt planning policy to assist in the decision-making process and is considered necessary and appropriate.
Approach to minor alterations to the Green Belt boundaries notwithstanding development needs 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.	PfE sets the Green Belt boundary for Oldham. A 'tidy up' of minor boundaries of a technical mapping nature has been undertaken as part of preparing the Local Plan, as allowed by NPPF. There is no defined methodology which exists for carrying out minor Green Belt boundary changes. The Natural Environment and Open Land Topic Paper sets out the justification and circumstances where Green Belt boundary changes have typically been proposed, including to address changes to the base map, to ensure boundaries are clearly defined and to amend slight overlaps with residential curtilage that were not intended. Appendix 1 (of the Topic Paper) provides reasoning for each boundary amendment. This is considered sufficient and proportionate for the minor amendments made.
Specific Grey Belt sites and Previously Developed Land in the Green Belt should be considered for release where this would support sustainable development, particularly in meeting housing needs.	The Local Plan does not address strategic Green Belt boundary revisions or allocate sites for development. It is considered that the identified housing land supply is sufficient to meet Oldham's housing requirement for the plan period. However, in line with national planning policy Grey Belt sites can still come forward for development where they comply with the criteria in national planning policy and relevant local planning policy.

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Saddleworth Parish Council (018): a specific reference to the Saddleworth Neighbourhood Plan policy 6 would be helpful. Also, criteria for 'infilling' need to be defined.	Upon adoption Saddleworth Neighbourhood Plan will form part of the development plan for the borough and considered in the determination of relevant planning applications. National planning policy allows for limited infilling in villages within the Green Belt, however there is not set definition. As such, the policy sets out that 'determining whether a proposed development is within a village will be assessed on a case-by-case basis having regard to the particular character, layout, and function of the settlement' and provides examples. This is considered sufficient guidance to assist in decision making for such applications.
Chorlton Planning Ltd (019): restriction of limited infill in villages to a small gap between existing buildings is unnecessary and should be deleted.	See response to Policy OL2 – Saddleworth Parish Council (018) at page 68 above regarding infill.
CPRE (44): lighting should be explicitly mentioned as some stables are often very brightly lit, and this can cause harm to wildlife and amenity. Suggested wording 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."	Proposed modification noted. Policy OL5 provides policy in relation to lighting and seeks to ensure that proposed lighting is the minimum required for security or working purposes; light spillage and glare are minimised, particularly in areas of open countryside or on the edge of settlements; and there is no significant harm impact on sites of nature conservation value.
<i>Representations from: Lancashire Wildlife Trust (002), Emery Planning - on behalf of: Mr J Jaskolka (006) and Redwaters Estates (016), Home Builders Federation (012), Saddleworth Parish Council (018), Chorlton Planning Ltd (019), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Prestigious Homes North West (031) and Andy Hulme (032), CPRE (044).</i>	

Summary of Comments	Oldham Council Response
Policy OL3 Extensions and alterations to existing buildings within the Green Belt	
Saddleworth Parish Council (018): term 'sympathetic' should be removed or better defined. 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. Should 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. 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. "	Proposed modification noted. Paragraph 135 c) of NPPF 2024 states planning policies and decision should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
<i>Representations from: Saddleworth Parish Council (018).</i>	
Policy OL4 Local Green Spaces (LGS)	
Lancashire Wildlife Trust (002): comment that paragraph 13.23 states that within time LGS may 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.	Noted.
United Utilities (007): request that the exceptions to this policy include water and wastewater infrastructure as follows: " <u>12. essential water and wastewater infrastructure.</u> "	Proposed modification noted. Policy OL4 is in line with national policy on Green Belt. Engineering operations are listed as an exception to development where they do not substantially harm qualities related to

Summary of Comments	Oldham Council Response
	the LGS. It is considered that the policy is sufficient to account for development related to water and wastewater infrastructure.
Sport England (009): the policy does not provide sufficient protection where the LGS contains a playing field and is inconsistent with NPPF. Suggested amendments/ added wording: 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.	Proposed modifications noted. Policy CO1 provides protection for playing fields. In addition, paragraph 13.23 of the policy reasoned justification states that 'Some of the LGS also include playing pitches which must be protected in line with Policy CO1. This includes works such as tree planting, pathways, etc that may affect sports facilities.' As such it is considered that the policy is appropriate and effective, especially when the Plan is read as a whole.
Saddleworth Parish Council (018): 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 be a reference to these, as well as to any other Neighbourhood Plans which come forward.	Upon adoption Saddleworth Neighbourhood Plan will form part of the development plan for the borough and considered in the determination of relevant planning applications.
<i>Representations from: Lancashire Wildlife Trust (002), United Utilities (007), Sport England (009), Historic England (011), Saddleworth Parish Council (018).</i>	
Policy OL5 Protecting Dark Skies and Tranquillity	
Lancashire Wildlife Trust (002): recommend referring to species and not just sites.	Comment noted.
Saddleworth Parish Council (018): generally supportive as policy addresses a particular issue encountered in Saddleworth around light spillage. Suggest that the wording might be slightly clearer if revised to read: "proposed lighting <u>does not exceed</u> is the minimum required for ..."	Proposed modification noted.

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Save Royton's Green Belt (022): suggest policy amended to consider duration and control of lighting, which make it more effective and better aligned with NPPF. Modification to criterion a) proposed as follows: "a) 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> "	Proposed modification noted.
<i>Representations from: Lancashire Wildlife Trust (002), Saddleworth Parish Council (018), Save Royton's Green Belt (022).</i>	
Addressing the Biodiversity Emergency	
General	
Lancashire Wildlife Trust (002): inclusion of species monitoring would be beneficial.	Noted.
<i>Representations from: Lancashire Wildlife Trust (002), Saddleworth Parish Council (018).</i>	
Policy N1 Protecting Nature	
Natural England (004): concerns regarding the 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 in this regard. Policy required 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. Reference should be made to the England Peat Status Greenhouse Gas and Carbon Storage dataset instead of the England Peat Map. Similar issue raised by Save Royton's Green Belt (022), modification to paragraph 14.20 proposed as follows: "14.20 Restorable peat has an important role to	Issue noted. Proposed modification noted.

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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. 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 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>	
Save Royton's Green Belt (022): current wording does not explicitly require consideration of cumulative or masterplan-wide ecological impacts. Policy needs to be strengthened to ensure consistency with the strategic approach in PfE (Policy JP-G8), which seeks to avoid the fragmentation of habitats and maintain ecological connectivity. 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>"	Proposed modification noted. The Oldham Local Plan will sit alongside the Places for Everyone Joint Plan (PfE) as part of a suite of documents that form the development plan for the borough. Many allocations in PfE require development to be in accordance with a comprehensive masterplan and design code. PfE Policy JP-G8 states that development will be expected to avoid fragmenting or severing connectivity between habitats, as such not considered necessary to repeat in Policy N1.
<i>Representations from: Emery Planning - on behalf of Oakmere Homes Ltd (001), Lancashire Wildlife Trust (002), Save Royton's Green Belt (022).</i>	
Policy N2 Restoring Nature	

Summary of Comments	Oldham Council Response
United Utilities (007): request that this policy also recognises the principle of locating biodiversity so that it is resilient to future pressures, as follows: “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>”	Proposed modification noted. Paragraphs 14.34 and 14.35 of the policy reasoned justification set out that applicants should follow the Greater Manchester Biodiversity Net Gain Guidance and refer to the GM Habitat Bank Verification and Auditing Guidance. A Biodiversity Gain Plan would be expected to consider whether habitats are located and designed so that they remain resilient to future pressures.
Sport England (009): 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. Include an additional avoidance clause as follows: “<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>”	Proposed modification noted. Policy CO1 provides policy to address the loss of open space, including playing fields - the Plan must be read as a whole. In addition, in identifying a BNG site, a Habitat Bank would, as part of the validation, check that there are no conflicting land uses and site constraints would be considered.
Home Builders Federation (012): 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. In addition, 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 affect the ability of developers to achieve BNG through other means.	There is a need to have regard to Local Nature Recovery Strategies in planning policies. Whilst PfE references the Greater Manchester Local Nature Recovery Strategy, this was in development at the time. As such, Policy N2 sets out that relevant development on Oldham will have regard to GM LNRS and should seek to support and deliver on the priorities and actions for nature recovery within the strategy.
Saddleworth Parish Council (018): the policy would be enhanced by making it clear that offsite areas should be identified and included in planning applications before permission is granted.	Whilst planning applications often note the identified BNG site, the site is only required to be legally secured as part of the discharge of condition application in line with the provisions of the statutory BNG

Summary of Comments	Oldham Council Response
	framework in Schedule 7A of the Town and Country Planning Act 1990, and as reflected in the BNG Planning Practice Guidance.
The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023): the Council should 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.	Noted.
<i>Representations from: Lancashire Wildlife Trust (002), United Utilities (007), Sport England (009), Home Builders Federation (012), Saddleworth Parish Council (018), The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025).</i>	
Policy N3 Enhancing Green Infrastructure (GI) through development	
Comments received that where the reasoned justification mentions the requirement for tree lined streets, for consistency with national policy (paragraph 136 of NPPF), this text should also make reference to footnote 52 at paragraph 136 which notes that tree lined streets are not required where there are clear, justifiable and compelling reasons why this would be inappropriate.	Proposed modification noted. Paragraph 14.53 of the policy reasoned justification does not require tree-lined streets. It does, however, provide guidance for landscaping, including tree-lined streets.
Lancashire Wildlife Trust (002): suggest that the Urban Greening Factor is made a policy in its own right.	The requirements in relation to the Urban Greening Factor are considered appropriately set out in Policy N3.
Canal & River Trust (003): 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.	Policy HE5 sets out the policy for canals.
Natural England (004): suggest including reference to the specific GM LNRS action on meeting the national Urban Greening Factor as further evidence for, and justification of, the policy approach.	Paragraphs 14.49 and 14.50 of the policy reasoned justification provided further detail on the application of the Urban Greening Factor.

Summary of Comments	Oldham Council Response
Home Builders Federation (012): state that the Urban Green Factor 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. In addition, it is 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.	In this instance the use of the phrase 'should' implies a degree of flexibility in the application of the Urban Greening Factor so as to enable consideration of the circumstances of a proposed development.
Saddleworth Parish Council (018): the limit for the application of points 5, 6 and 7, has been set at 20 homes rather than 10 and that 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.	As explained at footnote 114 developments of 20 homes and above or those of 1,000m2 and above are of an appropriate size and scale to accommodate meaningful green infrastructure as part of the development. It is considered that a higher number of homes can justify the additional requirements for green infrastructure.
Lichfields on behalf of Russell LDP (042): applying a formula may not be appropriate in all circumstances, particularly employment development, where specific operational requirements can limit the extent of land available to deliver green infrastructure. Unclear how the viability assessment has considered impact of the Urban Green Factor in this respect. Application of the policy should be done so flexibly for employment development sites. 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.	The impacts of the Urban Greening Factor will vary depending on site-specific circumstances. However, as the Viability Assessment represents high-level viability testing, an overall assumption has been made of policy costs, tested at different size scenarios (for employment development). Site specific testing would be needed to confirm developable areas and the potential implications of the amount of floorspace that can be delivered and the efficiency of site layouts. The Local Plan Viability Assessment is considered appropriate and proportionate in this respect.
<i>Representations from: Lancashire Wildlife Trust (002), Canal & River Trust (003), Natural England (004), Sport England (009), Home Builders Federation (012), Saddleworth Parish Council (018), Ashton</i>	

Summary of Comments	Oldham Council Response
<i>Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026), CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030), Prestigious Homes North West (031) and Andy Hulme (032), Lichfields on behalf of Russell LDP (042).</i>	
Policy N4 Trees	
Concern that the tree replacement ratios proposed may impact on the land uptake for any development and density, which has potential to affect viability. Whilst the cost of Policy N4 is considered through 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. Approach taken undermines the effectiveness of, and justification for, the policy.	The Viability Assessment has tested several different density scenarios. The density assumptions have been informed by realistic development scenarios. As such, this accounts for policy requirements, and the costs for this is included within the overall S106 cost that has been applied to each typology within the appraisals. Whilst tree replacement ratios may vary depending on site-specific circumstances and local authority requirements, any associated land take is expected to be accommodated within the overall development capacity assumptions. As this is high level viability testing, no adjustment has been made to the density assumptions or viability appraisals to reflect tree replacement requirements.
Saddleworth Parish Council (018): 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.	The purpose of Policy N4 is to protect and retain tree cover with the requirement that developments will as appropriate, having regard to its scale and nature, contribute to increasing the borough's tree canopy cover and its multi-functional benefits. Further, paragraph 14.72 of the policy reasoned justification states that species and locations for planting should be appropriate and agreed by the Council's Arboricultural and Countryside Team and where necessary highways.
Lichfields on behalf of Russell LDP (042): comment that 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 and that it is not clear why this	Policy N4 states that category C trees, as defined in Section 4.5 of BS 5837:2012 'Trees in relation to design, demolition and construction – Recommendations' will be replaced on a 2:1 basis in accordance with PfE. However, Policy N4 also aims to retain mature trees by having a higher number of trees that would be required if a more mature tree was lost or damaged rather than a blanket approach of 2:1. To protect

Summary of Comments	Oldham Council Response
Local Plan seeks to deviate away from the PfE policy which it needs to align with. Table N1 should be removed from the policy.	against the loss of mature trees, where possible. This reflects that to maintain or increase a level of mature trees, young trees are needed to restock the larger size classes (with surplus) to include planning for mortality.
<i>Representations from: Lancashire Wildlife Trust (002), Home Builders Federation (012), Saddleworth Parish Council (018), Lichfields on behalf of Russell LDP (042).</i>	
Historic Environment	
General	
Canal & River Trust (003): amend reference to 'non-designated assets' to read 'non-designated heritage assets'.	Proposed modification noted.
<i>Representations from: Canal & River Trust (003), Historic England (011).</i>	
Policy HE1 The Historic Environment	
Canal & River Trust (003): phrasing of 'restoration' of canals could lead to some confusion with canal restoration (abandoned canals). Proposed modification to amend 8) to read "protect and enable <u>improved</u> appreciation of canals" or remove.	Proposed modification noted.
Saddleworth Parish Council (018): more detail is needed on point 6, which seeks to 'acknowledge' and 'recognise' historic assets. 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.	Paragraph 15.14 of the policy reasoned justification provides clarity in relation to non-heritage assets.
<i>Representations from: Canal & River Trust (003), Historic England (011), Saddleworth Parish Council (018).</i>	

Summary of Comments	Oldham Council Response
Policy HE2 Securing the Preservation and Enhancement of Oldham's Heritage Assets	
<i>Representations from: Historic England (011), Saddleworth Parish Council (018).</i>	
Policy HE3 Development Proposals Affecting Conservation Areas	
Saddleworth Parish Council (018): two conservation area appraisals have been done (separate to the Oldham Town Centre Conservation area) and they 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 recommend their inclusion.	Paragraph 15.34 states that 'development proposals should have regard to any existing and future conservation areas appraisals and management plans'.
<i>Representations from: Historic England (011), Saddleworth Parish Council (018).</i>	
Policy HE4 Oldham's Mills	
Saddleworth Parish Council (018): there are several mills which have already been converted or are in use that remain visually part of the wider street scene but not referenced. These should be referenced in the policy approach.	Policy HE4 focuses on non-designated mills and excludes those that have already been converted.
Save Royton's Green Belt (022): 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	Proposed modifications noted. Strategy commissioned jointly with Historic England who were satisfied with the methodology, scoring and recommended policy approach. The policy provides a framework for decision making rather than a rigid approach. Proposals are always assessed on a case-by-case basis and the Mills Strategy is caveated so say individual viability assessments are required, as reflected in paragraph 15.40 of the policy reasoned justification.

Summary of Comments	Oldham Council Response
of the 'Mill Cluster's part of the policy. See full modifications proposed in representation.	
<i>Representations from: Historic England (011), Saddleworth Parish Council (018), Save Royton's Green Belt (022).</i>	
Policy HE5 Canals	
Canal & River Trust (003): phrasing of 'restoration' of canals could lead to some confusion with canal restoration (abandoned canals). Requests amending the text to read "To ensure <u>that the future conservation and enhancement of canals is enabled</u> , 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."	Proposed modification noted. See response to Policy HE1 – Canal & River Trust (003) at page 77 above.
Saddleworth Parish Council (018): policy focuses on the setting and appearance of the canal, heritage and green infrastructure. Wider exploration of benefits required.	The benefits of the canal network are explored in paragraphs 15.48 and 15.51 of the policy reasoned justification.
<i>Representations from: Canal & River Trust (003), Historic England (011), Saddleworth Parish Council (018).</i>	
Achieving High Quality Design	
General	
Graeme Moore (020): considers design policies unsound with reference to the deletion of Draft Plan Policy D3 – Design Scrutiny.	Whilst Draft Plan Policy D3 has been deleted reference to local design review has been included in Policy D1, with further explanation provided at footnote 139 and paragraph 16.9 which includes a link to the Design Council's guidance 'Design Review Principles and Practice'.

Summary of Comments	Oldham Council Response
Policy D1 Achieving High Quality Design	
Canal & River Trust (003): additional wording for criteria 2 and 11 suggested to help avoid defensive boundary treatments in sensitive areas such as the canal corridor, as follows: “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</u> 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>”	Proposed modifications noted. It is considered that criteria within the policy as worded adequately cover the points raised, such as criteria 1 and 4.
United Utilities (007): request that this policy refers to a site-wide infrastructure strategy that ensures a co-ordinated and holistic approach as follows: “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>”	Proposed modification noted. PfE Policy JP-D1 requires applicants to prepare an infrastructure phasing and delivery strategy to be agreed by the local planning authority for sites where build out will be delivered by different developers or in phases. Furthermore, PfE Policy JP-S4 requires sustainable drainage systems to be delivered in a holistic and integrated manner. Whilst Local Plan Policy CC3 sets out that foul and surface water strategies will be required as part of a holistic site-wide drainage strategy for those proposals part of a wider development / allocation.
Home Builders Federation (012): design guides listed at paragraph 16.6 are not development plan documents and therefore requiring development adheres to these is not appropriate. Policy should seek to ensure that applicants have ‘regard to’ local design guides. Threshold for when a design review is required and process is unclear. Ambiguity may lead to significant delays in determining planning applications/ sites coming forward. The Council should	Paragraph 16.6 of the policy reasoned justification lists guidance prepared by specialist organisations, which applicants may consider - it is not a list of local design guides. Regarding design review please see response to general comment under Achieving High-Quality Design (response to Graham Moore (020)) on page 79.

Summary of Comments	Oldham Council Response
clearly set out more information on how design review panels will operate to make the policy effective.	
Manchester Airport Group (015): 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.	Noted.
Graeme Moore (020): Draft Plan Policy D3 replaced with a single sentence in Policy D1. Developments that raise significant design issues is undefined and subjective. In the absence of thresholds, judgment falls to the planning officer assessing the application. The use of 'where appropriate' regarding site-specific design codes add further ambiguity with various reasons listed. 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.	Proposed modification noted. Please see response to general comment under Achieving High-Quality Design (response to Graham Moore (020)) on page 79 above.
Lichfields on behalf of Russell LDP (042): 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.	Where relevant, PfE allocation policies require development to be in accordance with a comprehensive masterplan and design code as agreed by the local planning authority.

Summary of Comments	Oldham Council Response
CPRE (044): 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) and integration with the nature recovery network; <u>and the preservation and enhancement of local biodiversity.</u>” Also, 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>”	Proposed modifications noted. Plan should be read as whole and Policy N2 is focused on the protection and enhancement of biodiversity. Policy H2 seeks to ensure densities are maximised in appropriate locations, whilst Policy C3 sets out how the provision of new homes will be supported in our centres and the circumstances in which ground floor residential uses will be permitted.
<i>Representations from: Lancashire Wildlife Trust (002), Canal & River Trust (003), United Utilities (007), Sport England (009), Historic England (011), Home Builders Federation (012), Manchester Airport Group (015), Saddleworth Parish Council (018), Graeme Moore (020), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025) and Grasscroft de Greenfield Ltd (028 and 029), Lichfields on behalf of Russell LDP (042), CPRE (044).</i>	
Policy D2 Advertisements, Signage and Shop Fronts	
Saddleworth Parish Council (018): concerns that reference to advertising in conservation areas simply states that the advertising should be compliant with policies HE2 and HE3, which do not mention	Policies HE2 and HE3 are considered to provide an appropriate policy framework. Policy HE2 sets out how proposals affecting a designated heritage asset and its setting will be assessed. Policy HE3 5) to 13)

Summary of Comments	Oldham Council Response
advertising. Policy should strengthen the conditions applied to advertising in conservation areas.	sets out the policy position for shopfronts, retail frontages and signage in Conservation Areas.
<i>Representations from: Historic England (011), Saddleworth Parish Council (018).</i>	
Policy D3 Creating a Better Public Realm in Oldham	
Saddleworth Parish Council (018): suggest removing “in Oldham” from the title. No reference to antisocial behaviour. This needs to be explicitly referenced.	Noted. Policy D1 sets out that development proposals, where applicable, should through their design: ensure that the design and layout minimises actual and perceived opportunities for crime, anti-social behaviour, disorder and terrorism. Criterion 9 of Policy D3 also states that development proposals should ensure that any buildings are of a design that activates and defines the public realm and provides natural surveillance.
<i>Representations from: Lancashire Wildlife Trust (002), Saddleworth Parish Council (018).</i>	
Policy D4 Extensions and alterations to, and development within the curtilage of, a dwellinghouse	
United Utilities (007): 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.	Proposed modification noted.
<i>Representations from: United Utilities (007), Saddleworth Parish Council (018).</i>	
Creating a Sustainable, Active, Accessible Network for Oldham	
General	

Summary of Comments	Oldham Council Response
Saddleworth Parish Council (018): suggest removing “in Oldham” from the title.	This change is not considered to be necessary.
National Highways (024): transport evidence available 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 be relied upon to demonstrate the combined impact of the Local Plan allocations alongside cross-boundary development. 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.	The purpose and role of the Oldham Local Plan is to support delivery of PfE in Oldham. Providing more detailed non-strategic ‘development management’ policies that support the strategic policies in PfE, whilst ensuring that together they reflect, and support delivery of, the Council’s priorities and those of our Building a Better Oldham regeneration ambitions. The evidence presented along with the transport evidence submitted during the examination into PfE is considered an appropriate amount of information for a Local Plan that is proposing no site allocations. In terms of the impact on the SRN: - Policy T1 sets out that any development that may impact the SRN should involve National Highways at the earliest opportunity. Further detail is then provided at paragraph 17.17. - Policy T5 sets out that where applications will affect the SRN, applicants should provide confirmation from National Highways that the scope and detail of the Transport Statement and Travel Plan is sufficient for the purposes of assessing the application within the statutory timescales. Further detail is provided at paragraphs 17.44 and 17.45.
<i>Representations from: Saddleworth Parish Council (018), National Highways (024).</i>	
Policy T1 Delivering Oldham’s Transport Priorities	
Saddleworth Parish Council (018): request information on Standedge Tunnel and if reference to the electrification of the rail line, or to high-speed rail should be added.	The Standedge Tunnel project, along with improvements to Diggle Station are to support the TransPennine Route Upgrade. Oldham will benefit significantly from enhancements to east–west connectivity across the North of England, particularly through the TransPennine Route Upgrade (TRU).

Summary of Comments	Oldham Council Response
National Highways (024): they 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.	Policy T1 states that any development that may impact on the Strategic Road Network (SRN) should involve National Highways at the earliest opportunity, with paragraph 17.17 of the policy reasoned justification setting out further guidance. PfE also includes Policy JP-C4: The Strategic Road Network, and Policy JP-C8: Transport Requirements of New Development.
Lichfields on behalf of Russell LDP (042): 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 addition, the Viability Assessment 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. If financial contributions are requested by the Council they should meet the tests as set out in NPPF. 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 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.	Policy T1 states that the Council will seek developer contributions, where appropriate, towards the provision or enhancement of highway, public transport and / or active travel schemes. It also states that any development that may impact the SRN should involve National Highways at the earliest opportunity. Further policy on planning obligations is then set out in Policy IN2, which states that for large-scale development or strategic sites subject to phasing it may also be appropriate to pool S106 monies raised from planning obligations, to contribute towards a piece of infrastructure or project that will support delivery of the whole site and its comprehensive development. In such situations the Council will work with developers to facilitate the delivery of provision as appropriate. PfE also includes Policy JP-C8 and Policy JP-D1 which requires applicants to prepare an infrastructure phasing and delivery strategy to be agreed by the local planning authority for sites where build out will be delivered by different developers or in phases. This strategy must outline what needs to be provided by when and who will fund and deliver it. In relation to Stakehill, PfE policy requirements are set out in JPA2.
<i>Representations from: Canal & River Trust (003), Sport England (009), Saddleworth Parish Council (018), National Highways (024), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025), Lichfields on behalf of Russell LDP (042).</i>	

Summary of Comments	Oldham Council Response
Policy T2 Travel Hubs and Park and Ride Facilities	
CPRE (044): Park and Ride Facilities generally reduce car journeys 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. 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 England and Network Rail. <u>The use and impact of the facility should be regularly monitored.</u>”	Proposed modification noted. The policies within PfE and the Oldham Local Plan are considered to provide an integrated policy approach and is a key element of the Greater Manchester Transport Strategy. Policy T2 itself also states that the Council will support such schemes where they form part of a wider strategy for public transport and active travel. Travel Hubs and Park and Ride facilities will be developed in conjunction with Transport for Greater Manchester (TfGM).
<i>Representations from: Saddleworth Parish Council (018), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025), CPRE (044).</i>	
Policy T3 Parking Provision	
United Utilities (007): request that this policy also refers to including sustainable water management measures in the landscaping of any parking as follows: “The design of parking areas needs to include <u>sustainable water management measures in the landscaping for the site and</u> pedestrian-only safe routes through and around parking areas.”	Proposed modification noted. Policy CC3 Sustainable Drainage – Foul and Surface Water addresses sustainable water management in development.

Summary of Comments	Oldham Council Response
Saddleworth Parish Council (018): include reference to existing guidance on the provision of sufficient visitor parking etc on larger developments.	In justifying the parking levels proposed, Policy T3 requires consideration of likely trip generation and parking needs for the proposed development evidenced as appropriate.
Graeme Moore (020): concerned with the absence of a policy establishing maximum car parking standards for new development across the borough - the absence renders the plan unsound. 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.	There is no requirement in NPPF (December 2024) stating Local Plans must contain parking standards, rather it sets out a series of considerations for Local Plans setting parking standards.
<i>Representations from: United Utilities, Saddleworth Parish Council (018), Graeme Moore (020).</i>	
Policy T4 Electric Vehicle Charging Infrastructure	
Home Builders Federation (012): requirements for electric vehicle charging infrastructure are set out in Part S of Building Regulations. No mechanism for going over and above this in the plan-making system. As such, policy is superfluous and should be deleted.	As set out in paragraph 18.36 of the policy reasoned justification new development can make an important contribution to enabling the use of electric vehicles. Whilst it is acknowledged that there is potential for significant advances in low emission technologies, electric vehicles are a key part of this, and it is therefore considered important that this Local Plan supports the development of the electric vehicle infrastructure network.
Lichfields on behalf of Russell LDP (042): unclear whether the appropriate viability evidence has been considered for the impact on non-residential developments. Policy should be updated to provide proportionate viability justification for the requirement of electric vehicle charging facilities on non-residential development.	The Viability Assessment has included an allowance for electric vehicle (EV) charging infrastructure at £1,000 per dwelling for houses and £2,500 per four flats. No equivalent allowance has been applied to commercial development typologies. This reflects the fact that EV charging requirements for commercial uses are highly dependent on the nature of the occupier, parking provision, operational requirements and end-user fit-out specifications. In many instances, charging infrastructure is installed by occupiers as part of their operational

Summary of Comments	Oldham Council Response
	requirements rather than by developers as part of the base-build specification. Applying a standardised cost allowance across all commercial typologies would therefore risk either overstating or understating likely costs and would not provide a robust basis for high-level viability assessment.
<i>Representations from: Home Builders Federation, Saddleworth Parish Council (018), Save Royton's Green Belt (022) Lichfields on behalf of Russell LDP (042).</i>	
Policy T5 Vision-led Transport Statements, Transport Assessments and Travel Plans in New Development	
Saddleworth Parish Council (018): question requirement for any development requiring a Transport Assessment to consider air quality impacts on Holcroft Moss given the distance of much of the borough.	PfE Policy JP-C8 requires all planning applications accompanied by a Transport Assessment to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC). Further advice on the implementation of JP-C8 is set out the adopted Holcroft Moss Supplementary Planning Document (SPD).
National Highways (024): suitable body of evidence required for larger strategic sites to support the vision goals for developments to encourage modal shift for short- and medium-distance trips. This approach should follow the guidance in the Working with National Highways to Delivery a Vision-Led Approach for Local Plans (December 2025) document. Confirmation should be provided by Oldham Council as to whether the cumulative impacts will take identified cross-boundary PfE sites into account for future baseline assessments, which may also impact the operation of the SRN.	See response to general comment by National Highways (024) to 'Creating a Sustainable, Active, Accessible Network for Oldham' on page 84.
<i>Representations from: Saddleworth Parish Council (018), National Highways (024).</i>	

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Communities	
Policy CO1 The Protection of Open Space, Sport and Recreation Provision	
Sport England (009): 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. 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. 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.	Proposed modifications noted. The second part of the policy under the heading 'Playing fields, pitches and outdoor sports provision' is intended to provide policy for this type of open space provision. The reference of 'have regard to' is referring to evidence base documents, as such the wording is considered appropriate. The wording of Policy CO1 reflects national planning policy. Regarding the final paragraph, there could be instances, in line with national planning policy and guidance, where it may not be appropriate to replace provision in another location, for example where there is no identified need for retention or where enhanced or alternative provision would deliver greater overall sporting benefit. As such the wording of the policy is considered acceptable.
Pegasus Group on behalf of DWFCO (043): policy's restrictive nature must 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. Question the reference to subsequent updates and comment that the 2022 Open Space Study has not been issued as a key evidence base document as part of this consultation process. Aware that site proforma assessments were carried out in several cases – these should be made available for transparency. Designation of two open spaces questioned.	The policy is based on accessible and tangible evidence as referenced (the 2022 Open Space Study and 2025 Playing Pitch Strategy), the reference to future updates is to ensure partial or full updates to the evidence based can be introduced in the correct manner i.e. through a Interim Planning Position Paper, as appropriate. The Open Space Study has been available on the Council's website since 2022 - it is listed in the Publication Plan evidence list and the Communities Topic Paper as a key evidence base document. Individual open space site proformas are not publicly available as this is the property of the consultants who prepared the Study and is part of the background methodology that has informed their assessment of

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	spaces set out in the Study. Open space scoring and the methodology is fully explained Study and therefore it is not required or appropriate to provide the individual assessments.
<i>Representations from: Emery Planning - on behalf of Oakmere Homes Ltd (001), Sport England (009), Saddleworth Parish Council (018), Pegasus Group on behalf of DWFCO (043).</i>	
Policy CO2 New and Improved Open Space, Sport and Recreation Provision	
Lancashire Wildlife Trust (002): the type of habitats created within new open space should also have regard to the GM LNRS where appropriate.	This is noted. Policy N2 sets out that 'Development will have regard to the Greater Manchester Local Nature Recovery Strategy (LNRS) and should seek to support and deliver on the priorities and actions for nature recovery within the strategy.' As such, any new open spaces created would have to consider this policy also.
Sport England (009): 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.	Proposed modifications noted. Open space needs and deficiencies can still relate to sports provision - as is set out in the Playing Pitch and Outdoor Sports Strategy (PPOSS), footnote 165 clarifies this. Under the 'Open Space Standards' sub-headed section, the 2nd paragraph clarifies the position regarding the standards as they relate to outdoor sports provision (as does paragraph 18.20 of the policy reasoned justification), and outdoor sports provision is not included within the standards table (table CO1). Site-by-site in this context is referring to PPOSS Action Plan as is clarified by footnote 168.
Saddleworth Parish Council (018): possible inconsistency between policy N3 which refers to 20 homes, where this refers to 10 homes.	Policy N3 is referring to Green Infrastructure, which can include open spaces but also many other features. The 20 homes threshold in N3 has been informed by recommendations in Oldham's Green Infrastructure Strategy. Policy CO2 relates to new and improved open

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	space provision and uses the threshold of 10 homes which reflects major development (defined in NPPF: Annex 2 Glossary). It is considered that this is appropriate as smaller sites can still impact on open space needs (with added population etc.) and can provide meaningful open space which can contribute to open space needs.
<i>Representations from: Lancashire Wildlife Trust (002), Sport England (009), Saddleworth Parish Council (018).</i>	
Policy CO3 Community Facilities	
Sport England (009): 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.	Proposed modifications noted. The policy reasoned justification (paragraph 18.35) does not include a definitive list of community facilities - rather it provides examples (sports provision is not provided as an example). Furthermore, the plan should be read as a whole, and therefore where the loss of sports/ recreational facilities is involved Policy CO1 would apply. Likewise, where a new recreation and leisure facility is to be provided, Policy CO2 would apply, which includes reference to considering evidence such as the PPOSS. As such, the policy is considered appropriate and consistent with NPPF.
<i>Representations from: NHS Greater Manchester ICB (017), Sport England (009), Saddleworth Parish Council (018), NHS Property Services Ltd (045).</i>	
Policy CO4 Education and Skills	

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Sport England (009): 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. See full representation for exact modifications requested.	Proposed modifications noted. The plan should be read as a whole - Policy CO1 would apply to the loss of any playing fields/ provision for sport and recreation. In addition to wording within the policy promoting the shared use of facilities, paragraph 18.45 of the policy reasoned justification also promotes this. Policy considered sufficiently explicit in this regard.
<i>Representations from: Sport England (009), Saddleworth Parish Council (018).</i>	
Policy CO5 Securing Educational Places through New Residential Development	
Comments on the justification/ evidence for the policy. 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. 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. The policy could be more proactive in identifying where expansion or new schools will be required to provide greater certainty.	The Communities Topic Paper sets out the evidence to support the policy. It refers to the Oldham Education Provision Strategy (2022-2024) and the School Capacity Survey (SCAP). The SCAP is based on data collected about: school capacity, pupil forecasts and capital spend. The data is used to identify areas where there may not be enough school places and also use projections of pupil numbers to calculate the basic needs funding local authorities receive to provide enough school places to meet future demand. The SCAP is informed by housing growth and potential identified future development in the borough. A source of this information is Oldham's Housing Land Supply (SHLAA). The information is updated annually, in line with updated housing land supply evidence. Moreover, the education yields formula from Department for Education is updated from time to time – the policy reasoned justification (paragraphs 18.52-18.53) states that the latest DfE scorecards should be used which consider housing land supply/ demand based on local authority data. The Local Plan does not include site allocations. The need for new schools in relation to PfE Strategic Allocations will be considered in

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	line with the relevant allocation policies. Education colleagues are consulted as part of major applications and advise as to whether a new facility is needed or whether a contribution towards improving/ expanding existing provision is more appropriate. As such, it is considered that the policy is effective in ensuring new development is supported by appropriate education provision.
Home Builders Federation (012): The Local Plan Viability Assessment makes a general allowance for an education contribution which is included in an overall S106 cost assumption (£5,500 per plot). 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.	The Local Plan Viability Assessment assumes a cost-per unit figure derived from high-level assumptions of combined policy costs. Sensitivity testing within the assessment has also assumed varying levels of s106 policy costs to inform the sensitivity analysis. Specific policy costs would apply on a site-by-site basis and as such given the high-level assessment provided in the Local Plan Viability Assessment it is not appropriate nor proportionate for these to be tested in the assessment.
<i>Representations from: Home Builders Federation (012), Saddleworth Parish Council (018), Save Royton's Green Belt (022), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025).</i>	
Policy CO6 New Development and Health	
Comments received asking for a reference to NHS Greater Manchester ICB be included as follows: "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; [...]" Also asking that the Council 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 noted. The policy and paragraph 18.57 of the policy reasoned justification encourages early dialogue with the GM Integrated Care Partnership – Oldham Locality and Integrated Care Board to determine the health care requirements associated with new development and to ensure that appropriate provision is provided.

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Home Builders Federation (012): policy seeks alignment with PfE Policy JP-P6. However, to be effective, the policy should identify how 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.	It is not considered appropriate to list the 'other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing' as this will be dependent on the specific circumstances of the proposed development. As set out in paragraph 18.61 of the policy reasoned justification applicants are advised to seek advice from the local planning authority before carrying out a HIA to ensure that the correct level of HIA is being prepared and that it is proportionate to the scale and nature of the development proposed.
<i>Representations from: NHS Greater Manchester ICB (017), Home Builders Federation (012), Saddleworth Parish Council (018), NHS Property Services Ltd (045).</i>	
Policy CO7 Hot Food Takeaways and Fast-food Outlets	
Saddleworth Parish Council (018): clarification required regarding what 'unacceptable concentration' constitutes to ensure the effectiveness of the policy.	As outlined in paragraph 18.64 of the policy reasoned justification is seeking to limit the proliferation of hot food takeaways the Council will have regard to such issues as the proximity to locations where children and young people congregate; evidence indicating high levels of obesity and health inequalities; the over-concentration of certain uses within a specified area; and other issues such as odours and noise impact, refuse and litter.
British Land (041): policy is unsound as 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-centre retail parks, which is unjustified and disproportionate. A modification is proposed to request that out-of-centre retail parks are removed from the definition of "places where children and young people congregate" in paragraph 18.62.	Proposed modification noted. Paragraph 18.62 of the policy reasoned justification lists a number of places where children and young people are considered to congregate – parks; leisure facilities such as cinemas, climbing walls, sports centres; out of centre retail parks such as Elk Mill and Alexandra Retail Park; sixth forms and colleges; libraries; community, children's and youth centres; and places of worship. As outlined at paragraph 18.63 this list will be kept under review throughout the lifetime of the Plan and will be updated as appropriate.

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<i>Representations from: Saddleworth Parish Council (018), British Land (041).</i>	
Protecting Our Local Environment Policies	
Policy LE1 Ensuring a High Standard of Amenity in New Development	
Comments received that the policy should refer to a wider range of amenity considerations such as odour, noise, vibration, traffic movement and dust.	The policy provides additional detail to PfE policies which deal with amenity (including JP-P1, JP-P2, JP-H1). Other local plan policies including LE2, LE3, OL5, D2, D4, T1, CO6 and CO7 also cover amenity issues. As such, when the Plan is read as a whole alongside PfE, it is considered sufficient to deal with amenity.
United Utilities (007): policy should refer to a wider range of amenity considerations such as odour and dust and to any safety considerations at existing sites. This will ensure consistency with the 'agent of change' principle. This is requested due to the assets which UU operate in the borough that can generate noise, odour, attract flies and include hazardous operations. Amendments as follows: "Policy LE1 – Ensuring a High Standard of Amenity <u>and Safety</u> in New Development 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> protection from noise pollution and vibration 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. [...] Proposals will be required to demonstrate, at planning application stage, that where applicable the following matters have been	Proposed modifications noted.

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adequately addressed in relation to both the construction and operational life of the development: 1. noise and vibration (particularly with regards to noise-sensitive uses), including internal and external levels, timing, duration and character; and 2. traffic movements to, from and within, the site including car parking and arrangements for deliveries.; <u>and</u> 3. <u>any other relevant amenity / safety considerations.</u> The Council will not support proposals where new residents and occupiers would be likely to raise complaints about neighbouring existing uses <u>(existing or proposed)</u> or where <u>there are safety concerns as a result of a hazardous installation or operation.</u> [...] 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, <u>and</u> 2 <u>and</u> 3 above.” Also suggest that paragraph 19.22 within the reasoned justification for Policy LE3, is moved to the reasoned justification associated with Policy LE1.	
<i>Representations from: United Utilities, (007), Saddleworth Parish Council (018).</i>	
Policy LE2 Ground Conditions and Contaminated Land	
United Utilities (007): 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</u>	Proposed modification noted. Policy LE2 requires appropriate measures to be taken to remediate and/or satisfactorily mitigate the risk of contamination and/or existing ground conditions.

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strategy.” Reflecting the importance of remediation strategies addressing contaminants which should be treated at source and not transferred.	
The Coal Authority (040): note that 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.	Noted. The policy provides sufficient guidance to deal with any coal features as part of development.
<i>Representations from: Canal & River Trust (003), United Utilities, (007), Saddleworth Parish Council (018), The Coal Authority (040).</i>	
Policy LE3 Air Quality	
Save Royton’s Green Belt (022): policy 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. 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.	Proposed modifications noted. Criteria 3 of PfE Policy JP-S5: Clean Air requires applications for developments that could have an adverse impact on air quality to submit relevant air pollution data so that adverse impacts on air quality can be fully assessed and development only permitted where they are acceptable and/or suitable mitigation can be provided. Furthermore, as outlined in paragraph 5.52 of PfE the cumulative air quality impacts of the proposed scale and distribution of development in this plan on nationally designated nature conservation sites have been considered through a separate Habitats Regulations Assessment.
<i>Representations from: Lancashire Wildlife Trust (003), Saddleworth Parish Council (018), Save Royton’s Green Belt (022).</i>	
Infrastructure and Delivery in Oldham	
General	
Saddleworth Parish Council (018): suggest removing “in Oldham” from the title.	This is not considered to be necessary.

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<i>Representations from: Saddleworth Parish Council (018), SP Electricity North West (046).</i>	
Policy IN1 Digital Infrastructure and Telecommunications	
United Utilities (007): 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.	Proposed modification noted. PfE policy JP-S6 requires development to minimise waste, use materials efficiently, and follow circular economy principles—prioritising reuse, low-carbon materials, and long-life, adaptable design. The Plan should be read as a whole and with PfE.
Home Builders Federation (012): requirement for broadband infrastructure for new residential developments is already set out in Part R of Building Regulations and no mechanism for going over and above this in the plan-making system. This part of the policy is superfluous and should be deleted.	Final paragraph of policy goes on to explain that where it is demonstrated that Fibre to the Premises (FTTP) is not viable, proposals should ensure that new development is broadband ready through the installation of appropriate ducting and equipment. Where no broadband provision is included, developers will be required to demonstrate through consultation with broadband providers that such connections are not deliverable or viable.
Saddleworth Parish Council (018): policy lists several 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. Note that there is a small exclusion area around some masts for health and safety and would strongly support references to such in the policy, as well as to other potential impacts such as the that of foundations for masts on drainage and sewerage.	Noted.
<i>Representations from: United Utilities (007), Historic England (011) (007), Home Builders Federation (012), Manchester Airport Group (015), Saddleworth Parish Council (018).</i>	

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Policy IN2 Planning Obligations	
Comments received stating that it is important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability.	It is considered that the policy provides sufficient flexibility. The policy provides a section on how viability will be considered.
Comments received that 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.	Policy CO6 (and paragraph 18.57 of the policy reasoned justification) encourage early dialogue with the GM Integrated Care Partnership – Oldham Locality and Integrated Care Board to determine the health care requirements associated with new development and to ensure that appropriate provision is provided.
United Utilities (007): 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> ”	Proposed modification noted. Several policies within PfE and the Local Plan aim to ensure that new development is supported by necessary infrastructure. This includes PfE Policy JP-D1 which sets out how districts will work with infrastructure providers to promote collaboration; encourage early dialogue between developers and infrastructure providers to identify the infrastructure needs arising from new development and how these will be addressed; and require applicants to prepare an infrastructure phasing and delivery strategy where appropriate. Furthermore, the Infrastructure Delivery Plan published alongside the Oldham Local Plan provides a framework for ongoing engagement with infrastructure providers.
Sport England (009): request paragraph 20.14 of reasoned justification include reference to 'outdoor and indoor sports facilities' and Sport England's facility calculators.	As set out in paragraph 20.15 of the policy reasoned justification 'further information and detailed guidance in respect of planning obligations and policy requirements can be found in individual policies throughout the Plan.' Policy CO2 sets out the requirements in terms of new and improved open space, including sport and recreation facilities. This policy refers to Sport England's Playing Pitch Calculator (and other Sport England guidance).
Home Builders Federation (012): the Council is restricting the circumstances where it is possible to submit a site-specific viability	Policy IN2 is clear that in some cases a site-specific viability assessment may be submitted where the need for such is evidenced

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assessment – this would seem inappropriate given the viability issues identified in the Plan Viability Assessment. A more flexible approach to site specific viability assessments is required. In regard to the claw back mechanism, the Council should 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.	by a change in circumstance which could not have been evident in the whole plan Viability Assessment, in line with NPPF and PPG. The policy reasoned justification (paragraphs 20.18-20.22) provides further detail. As such it is considered that sufficient flexibility exists. In relation to the clawback (review) mechanism PPG is clear that ‘as the potential risk to developers is already accounted for in the assumptions for developer return in viability assessment, realisation of risk does not in itself necessitate further viability assessment or trigger a review mechanism. Review mechanisms are not a tool to protect a return to the developer, but to strengthen local planning authorities’ ability to seek compliance with relevant policies over the lifetime of the project. They should not be used to avoid policy compliance or reduce agreed contributions.’ As such the policy is considered appropriate.
The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023): to introduce such a clawback mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG. For a large or multi-phase development it makes sense to check whether a scheme's viability has changed with market movements. However, for a small single phased site, such as older persons housing scheme, 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: <u>“Single-phased development schemes will not be subject to a review mechanism.”</u>	Proposed modification noted. Regarding the clawback mechanism, the policy (point 2 of the Viability section) states that ‘...a clawback mechanism has been incorporated into the legal agreement <u>where appropriate</u>’. This recognises, therefore, that the clawback mechanism may not be necessary for every application, including, for example, small, single-phase schemes. Also, as outlined in the policy, developers are encouraged to enter into early discussions with the Council to discuss planning obligations and requirements. As such, it is considered that the policy is sufficiently flexible to allow this to be considered on a site-by-site basis at planning application stage.
Lichfields on behalf of Russell LDP (042): evidence found viability to be difficult in Oldham. This has particular implications for employment development and strategic allocations such as JPA2 ‘Stakehill’. PfE	The Local Plan provides further detail in relation to the strategic policies within PfE. Strategic Allocations in PfE have their own policies which provide policy requirements which may note site-specific

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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. Policy lacks clarity as to how local infrastructure requirements and planning obligations will be applied alongside the PfE framework. The Viability Assessment has not considered the impacts of 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. Recommends that the three tests in relation to planning obligations (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.	infrastructure requirements (including highway mitigation, for example). The Local Plan does not seek to replicate these requirements, however in some cases as part of any planning application the delivery of these requirements may need to be secured by planning obligations, which IN2 provides guidance for. Moreover, policies within the Local Plan may provide additional guidance to strategic policies in PfE, including specific developer contribution requirements which are not provided in PfE, such as in relation to open space, sport and recreation provision, and education and health requirements. Planning applications which come forward will need to comply with policies in PfE and the Local Plan.
<i>Representations from: United Utilities (007), Sport England (009), Home Builders Federation (012), NHS Greater Manchester ICB (017), Saddleworth Parish Council (018), The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023), Ashton Hale on behalf of: Beal Valley Broadbent Moss Consortium (025), Saddleworth Property Partnership (026), Grasscroft de Greenfield Ltd (028 and 029), CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030), Prestigious Homes North West (031) and Andy Hulme (032), Lichfields on behalf of Russell LDP (042), NHS Property Services (045).</i>	
IN3 Delivering Social Value and Inclusion	
Home Builders Federation (012): many residential developments bring with them social benefits and line with paragraph 45 of NPPF, do not consider that it is necessary to include a policy requiring major	As set out in paragraph 20.24 of the policy reasoned justification ensuring that new major development coming forward has regard to social value through the completion and implementation of their Social

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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. Presently, the policy is not justified, effective or consistent with national policy and should be deleted.	Value Strategy is a key part of how, through planning, we can help to support and deliver the ambitions and priorities set out within the Oldham Plan 2024-30. The policy sets out a list of factors to consider as may be appropriate depending on the nature of the development proposed and is not considered to place an undue burden on development. Further guidance on what to include within a social value strategy and the type of measures that could be used to assist developers in identifying how development can maximise its social value may be published to support Policy IN3.
The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023): older persons housing produces several significant benefits and offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Given this 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. 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>	Proposed modification noted. The policy sets out a list of factors to consider as may be appropriate depending on the nature of the development proposed and is not considered to place an undue burden on development. Further guidance on what to include within a social value strategy and the type of measures that could be used to assist developers in identifying how development can maximise its social value may be published to support Policy IN3.
<i>Representations from: Sport England (009), Home Builders Federation (012), Saddleworth Parish Council (018), The Planning Bureau on behalf of McCarthy and Stone and Churchill Living (023).</i>	
Monitoring	
Policy M1 Monitoring Framework	
Lancashire Wildlife Trust (002): 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 effective policing and enforcement of the agreements/ conditions where required. Monitoring and	The Greater Manchester Ecology Unit (GMEU) will audit progress towards achieving the stated outcomes for all significant on-site (and select off-site Biodiversity Net Gain (BNG)) schemes in conjunction with the Council. Where necessary, GMEU will make recommendations to the Council where monitoring has identified that

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enforcement of planning conditions will play a vital part in ensuring the success of the plan.	enforcement action needs to be taken in respect of the requirements of the planning obligations.
Home Builders Federation (012): unclear on what basis the Local Plan is being monitored. Monitoring Framework needs to be more precise in terms of data sources for the indicators and more definitive in terms of actions; identifying when, why and how actions will be taken to address any issues identified.	Each policy in the Local Plan will be monitored using specific indicators as set out in the policy's linkages box found at the end of each chapter and listed in Table M1 of Policy M1 which includes indicators and data sources. Where monitoring identifies underperformance or unintended outcomes: a) Further guidance on the relevant policy matter may be produced. b) Policy revisions and an early review of the Local Plan may be triggered. c) Engagement with stakeholders may be undertaken to address delivery barriers.
<i>Representations from: Lancashire Wildlife Trust (002), Home Builders Federation (012), Saddleworth Parish Council (018).</i>	
Sites submitted	
Several sites were submitted suggesting their suitability as housing sites (including for allocation).	The Local Plan does not include site allocations. The Setting the Scene Topic Paper provides further information regarding this. Sites can be submitted at any time for consideration for inclusion within the SHLAA annual update, including via an online form.
<i>Representations from: Emery Planning - on behalf of Oakmere Homes Ltd (001), Emery Planning - on behalf Mr J Jaskolka (006), Emery Planning - on behalf of Mr Lumb (013), Emery Planning - on behalf of Sheridan Group (014), Emery Planning - on behalf of Redwaters Estates (016), Ashton Hale on behalf of Saddleworth Property Partnership (026), Ashton Hale on behalf of Grasscroft de Greenfield</i>	

Summary of Comments	Oldham Council Response
<i>Ltd (029 and 034), Ashton Hale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (030), Ashton Hale on behalf of Prestigious Homes North West (031), Ashton Hale on behalf of Andy Hulme (032), Depol on behalf of Rowland Homes Ltd (035).</i>	
Supporting documents	
Habitats Regulations Assessment (HRA)	
Natural England (004): section 2 should summarise what components of the Plan go beyond PfE. In relation to section 6 they ask for the inclusion of additional explanatory text to support the screening decision in Table 6.1. Also ask that where there is likely significant effect (LSE) alone, these policies are 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. For section 7 suggest 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. Also suggest the AA consider a number of other impacts.	Noted.
<i>Representations from: Natural England (004).</i>	
Infrastructure Delivery Plan	
Comments received asking for 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.	Noted. It is acknowledged that the Infrastructure Delivery Plan published alongside the Oldham Local Plan provides a framework for ongoing engagement with infrastructure providers.

Summary of Comments	Oldham Council Response
National Highways (024): following the adoption of the emerging Greater Manchester Transport Strategy and Delivery Plan (2027-2037), the IDP will require revisiting to 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.	Noted. It is acknowledged that the Infrastructure Delivery Plan (IDP) published alongside the Oldham Local Plan provides a framework for ongoing engagement with infrastructure providers. Whilst the IDP seeks to identify the key infrastructure required to deliver the Local Plan, it does not capture every project being planned by all Council services and external providers. Nor is it intended to provide a prescribed implementation plan for the provision of infrastructure with confirmed funding and delivery timetables. It will be a 'living' document, recognising that infrastructure requirements will change over time as new or improved infrastructure is provided or facilities are lost; or technological advances or social and national policy changes require new forms of infrastructure or alternative methods of provision.
<i>Representations from: NHS Greater Manchester ICB (017), National Highways (024), NHS Property Services Ltd (045).</i>	
Topic Papers	
Transport, Housing and Employment Topic Papers	
National Highways (024): 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.	The Oldham Local Plan does not include site allocations as its focus is on 'non-strategic' development management policies as a 'part 2' plan to PfE. The evidence prepared to support PfE and the Oldham Local Plan is therefore considered appropriate and proportionate. Policies within PfE and the Oldham Local Plan will enable the detailed consideration of cumulative impacts to be addressed through site-specific transport evidence at the planning application stage, supported through ongoing engagement with National Highways.

Summary of Comments	Oldham Council Response
Housing Topic Paper (incorporates comments made on the Strategic Housing Land Availability Assessment (SHLAA))	
Depol on behalf of Rowland Homes Ltd (035): a significant proportion of the Council's identified five-year supply in Appendix 1 does not meet the definition of deliverable and thus cannot be relied upon to satisfy the NPPF paragraph 69 requirement. Reasons given as to why the identified supply is undeliverable.	The identified housing land supply (set out in Appendix 1 of the Housing Topic Paper and the SHLAA (2025)) has been prepared in line with NPPF and identifies a sufficient supply of sites which are and suitable, available, achievable. The Housing Topic Paper provides evidence and explains that the identified housing land supply (including the five-year supply) is sufficient to meet our housing requirement, as set out in H1, as required by NPPF paragraph 69.
<i>Representations from: National Highways (024), Ashton Hale on behalf of Beal Valley Broadbent Moss Consortium (025), Depol on behalf of Rowland Homes Ltd (035).</i>	
Strategic Flood Risk Assessment (SFRA)	
Environment Agency (037): recommend a 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 the SFRA update would benefit from magnified mapping of the entire PfE strategic allocations showing the most up to date flood mapping. Response goes on to outline which strategic allocations this would be of greatest benefit to.	Noted.
<i>Representations from: Environment Agency (037).</i>	

6. Appendices

Appendix 1 – Regulation 18 Notification Consultation

Appendix 1a – Copy of the Regulation 18 Notification

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

(REGULATION 18)

NOTICE OF CONSULTATION ON THE SUBJECT AND SCOPE OF OLDHAM LOCAL PLAN

Notice is given that Oldham Council is preparing a new Local Plan to replace the existing Joint Core Strategy and Development Management Development Plan Document adopted November 2011. Views are sought on what the Local Plan ought to contain.

What is a Local Plan?

A Local Plan is a plan that is drawn up to guide and manage future growth and development (such as housing, offices, industry, warehousing and retail). It contains planning policies that will be used as the basis for determining planning applications and identifies sites where this development should be built as well as areas where development should be restricted.

It is essential that the Council continues to have an up-to-date statutory development plan in order to provide for the proper planning of the area.

Greater Manchester Spatial Framework

Together with the other authorities across Greater Manchester, Oldham Council is involved in the preparation of the Greater Manchester Spatial Framework. The approach set out within the emerging Local Plan will form an integral part of the Greater Manchester Spatial Framework.

Proposed scope of the Oldham Local Plan

The Oldham Local Plan will deal with matters at the local level setting out the spatial vision, strategic objectives and strategy for Oldham and cover planning policies and site allocations, where they provide additional policy direction for Oldham, in relation to:

- | | |
|--------------------------------------|--------------------------------------|
| • Sustainable development | • Natural environment |
| • Housing | • Economy and employment |
| • Other Protected Open Land | • Green Belt |
| • Built environment and heritage | • Design |
| • Retail and town centres | • Transport and accessibility |
| • Climate change and flood risk | • Infrastructure |
| • Communities, health and well-being | • Open spaces, sports and recreation |

The Oldham Local Plan will be accompanied by an adopted Proposals Map. Preparation of the Local Plan will be accompanied by an Integrated Assessment, incorporating Sustainable Appraisal, Health and Equality Impact Assessments and a Habitats Regulation Assessment.

The Oldham Local Plan will apply to the whole borough, except for that part of the borough that is the planning responsibility of the Peak District National Park Authority.

Comments

As a key early stage in the preparation of the Local Plan, we will be producing a report setting out the main issues that the Plan should be seeking to address and the reasonable options for addressing these.

To inform this, the Council is currently seeking views on what you think the Local Plan should contain in terms of what you feel are the key planning issues for Oldham and what should in broad terms, be the main aims of the Local Plan.

Comments are invited over a six-week period from 10th July to 21st August 2017.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.

Comments can be submitted online at <http://oldham-consult.limehouse.co.uk/portal/oc/planning/spi/>

Alternatively, comments can be emailed to spi@oldham.gov.uk or returned by post to the following address on no later than 17:00 on 21st August 2017:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team:

By phone on: 0161 770 4061
Or by email to: spi@oldham.gov.uk

Appendix 1c – Copy of Press Release issued for Regulation 18 Notification

As Oldham Council starts work preparing its Local Plan (LP) we are asking residents how they think the borough should develop in coming years.

This document helps to guide and manage future growth and development so we can meet the needs of the borough and its population.

The LP contains planning policies that will be used as the basis for determining applications and identifies sites where developments should be built as well as areas for protection.

It is essential that the council has an up to date Local Plan in order to provide a framework for development. Failure would reduce control over where building can take place.

Together with the other Greater Manchester local authorities, the council is involved in the preparation of the Greater Manchester Spatial Framework – and our LP will form a complementary part of that.

Areas the Oldham LP will cover include:

- Sustainable development
- Natural environment
- Housing
- Economy and employment
- Other Protected Open Land
- Built environment and heritage
- Green Belt
- Design
- Retail and town centres
- Transport and accessibility
- Climate change and flood risk
- Communities, health and well-being
- Infrastructure
- Open spaces, sports and recreation

As a key early stage in the preparation of the LP we will be producing a report setting out the main issues that the Plan should be seeking to address and the reasonable options for addressing these.

We want to hear what you think the Local Plan should contain in terms of key planning issues and what should be the document's main aims.

Councillor Barbara Brownridge, Cabinet Member for Neighbourhoods and Communities, said: "Oldham, and the region as a whole is changing, especially when it comes to employment patterns and job types, and if we are to play a leading role in a changing economy then our borough needs to reflect that.

“As a council we know the borough needs more housing, but this is your opportunity to tell us your thoughts about transport and roads, the green belt and the local economy, for example. These are all important for sustainable and inclusive growth.

“We know residents feel strongly about these issues so it’s important people get involved and have their say on the Local Plan.”

You can comment from July 10 to 5pm on August 21, 2017.

Comments can be submitted online at <http://oldham-consult.limehouse.co.uk/portal/oc/planning/spi/> or via email to spi@oldham.gov.uk Alternatively you can post comments to Strategic Planning and Information, Economy, Skills and Neighbourhoods, Room 310, Level 3, Civic Centre, West Street, Oldham OL1 1UH.

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response.

For further information or any questions contact spi@oldham.gov.uk or call 0161 770 4061.

NOTES TO EDITORS

The Oldham Local Plan will be accompanied by an adopted Proposals Map.

Preparation of the Local Plan will be accompanied by an Integrated Assessment, incorporating Sustainable Appraisal, Health and Equality Impact Assessments and a Habitats Regulation Assessment.

The Oldham Local Plan will apply to the whole borough, except for that part of the borough that is the planning responsibility of the Peak District National Park Authority.

Appendix 1d – Copy of Regulation 18 Notification Website Text

Regulation 18 Notification

Oldham Council is seeking the views of residents as we prepare a new Local Plan. This will replace the existing Local Plan (the 'Joint Core Strategy and Development Management Development Plan Document'), which was adopted November 2011.

The Local Plan helps to guide and manage future growth and development so we can meet the needs of the borough and its population. It contains planning policies that will be used as the basis for determining planning applications and identifies sites where developments should be built, as well as areas for protection.

It is essential that the council has an up to date Local Plan in order to provide a framework for development. Failure to do so would reduce control over where building can take place.

Together with the other Greater Manchester local authorities, the council is involved in the preparation of the Greater Manchester Spatial Framework – and our Local Plan will form a complementary part of the Spatial Framework.

The Local Plan will deal with matters at the local level setting out the spatial vision, strategic objectives and strategy for Oldham and cover planning policies and site allocations, where they provide additional policy direction for Oldham, in relation to:

- | | |
|---------------------------------|--------------------------------------|
| • Sustainable development | • Natural environment |
| • Housing | • Economy and employment |
| • Other Protected Open Land | • Built environment and heritage |
| • Design | • Green Belt |
| • Retail and town centres | • Transport and accessibility |
| • Climate change and flood risk | • Communities, health and well-being |
| • Infrastructure | • Open spaces, sports and recreation |

As a key early stage in the preparation of the Local Plan, we will be producing a report setting out the main issues that the Local Plan should be seeking to address and the options for addressing these.

To inform this work we are seeking views about what the local community and stakeholders think:

- a). the Local Plan should contain and what are the key planning issues for Oldham; and**
- b). what, in broad terms, should be the main aims of the Local Plan.**

The formal Regulation 18 Notification can be viewed [here](#).

How to comment:

Comments are invited over a six-week period from **10th July to 21st August 2017**.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at <http://oldham-consult.limehouse.co.uk/portal/oc/planning/spi/>

Alternatively, comments can be emailed to spi@oldham.gov.uk or returned by post to the following address no later than **by 17:00 on 21st August 2017**:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation, your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response. For further information or any questions contact spi@oldham.gov.uk or call 0161 770 4061.

Integrated Assessment Scoping Report

The Local Plan will be supported by an Integrated Assessment (IA). The IA will include the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and a Health Impact Assessment (HIA). The Habitats Regulations Assessment (HRA) will still be a standalone document; however its findings will be integrated into the IA.

The role of an IA is to promote sustainable development through assessing the emerging Local Plan against economic, environmental and social objectives. It is a way of ensuring that the preferred approach in the Plan is the most appropriate when assessed against any reasonable alternatives. It also allows for any potential adverse effects to be identified and mitigated and for improvements to environmental, social and economic conditions to be made.

The Scoping Report is the first stage of the IA process (Stage A). It identifies the scope and level of detail to be included in the IA report. The council has prepared an IA Scoping Report to satisfy Stage A.

The council is now required to consult the following three consultation bodies on the Scoping Report for a minimum of five weeks:

- Historic England;
- Natural England; and
- Environment Agency.

The Integrated Assessment can be viewed [here](#)

What kind of place do you want Oldham to be?

The council is starting to prepare a new Local Plan for the borough.

The Local Plan will guide future development across Oldham.

As part of this we would like to know:

- what are the key planning issues for Oldham; and
- what should be the main aims of the Local Plan?

To find out more about the Local Plan and how to comment visit our website at **www.oldham.gov.uk/localplan**

Alternatively, contact the Strategic Planning and Information Team on **0161 770 4061** or by email at **spi@oldham.gov.uk**

Comments are invited over a six week period from 10 July to 5pm, 21 August 2017.



Appendix 1f: Copy of Regulation 18 Notification email / letter text to all relevant Statutory Consultees

Re: Consultation on the subject and scope of the Oldham Local Plan (Regulation 18) and Integrated Assessment Scoping Report



SP
To
C/c Elizabeth Dryden-Stuart



Regulation 18 Notification Final.pdf
32 KB

Reply Reply All Forward ...
Mon 10/07/2017 08:46

Further details regarding the Local Plan and its proposed scope can be found on the Regulation 18 Notification attached.

Integrated Assessment Scoping Report

The Local Plan will be supported by an Integrated Assessment (IA). The IA will include the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and a Health Impact Assessment (HIA). The Habitats Regulations Assessment (HRA) will still be a standalone document. However, its findings will be integrated into the IA. The scope of these assessments is explained in more detail in the IA Scoping Report.

The role of an IA is to promote sustainable development through assessing the emerging local plan against economic, environmental and social objectives. It is a way of ensuring that the preferred approach in the plan is the most appropriate when assessed against any reasonable alternatives. It also allows for any potential adverse effects to be identified and mitigated and for improvements to environmental, social and economic conditions to be made.

The Scoping Report is the first stage of the IA process. It identifies the scope and level of detail to be included in the IA report. The Scoping Report sets out the context and identifies relevant environmental, economic and social issues, objectives and an assessment framework.

Stage A (Setting the context and objectives, establishing the baseline and deciding on the scope) involves the following tasks:

1. Identify other relevant policies, plans and programmes and strategies;
2. Collect baseline information;
3. Identify sustainability, health and equality issues;
4. Develop the IA appraisal framework, and
5. Consult the consultation bodies on the scope of the IA report.

The council has prepared an IA Scoping Report to satisfy Stage A. The IA Scoping Report has been structured to include a section on each of the above tasks.

In light of the technical nature of the IA the council is now carrying out a 'focussed' consultation with key consultees on the IA Scoping Report for six weeks.

The IA Scoping Report can be viewed on the council's website at https://www.oldham.gov.uk/downloads/download/1165/integrated_assessment_scoping_report

How to comment:

Comments are invited on the scope of the Local Plan and the IA Scoping Report over a six-week period from **10th July to 21st August 2017**.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments (on the scope of the Local Plan only) can be submitted online at <http://oldham-consult.limehouse.co.uk/portals/consulting/sp/>

Alternatively, comments on the scope of the Local Plan and IA can be emailed to sp@oldham.gov.uk or returned by post to the following address no later than by **17:00 on 21st August 2017**:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation, your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response.

Re: Consultation on the subject and scope of the Oldham Local Plan (Regulation 18) and Integrated Assessment Scoping Report



SPI

To

Cc

Elizabeth Dryden-Stuart



Regulation 18 Notification Final.pdf
32 KB

2. Collect baseline information;
3. Identify sustainability, health and equality issues;
4. Develop the IA appraisal framework; and
5. Consult the consultation bodies on the scope of the IA report.

The council has prepared an IA Scoping Report to satisfy Stage A. The IA Scoping Report has been structured to include a section on each of the above tasks.

In light of the technical nature of the IA the council is now carrying out a 'focussed' consultation with key consultees on the IA Scoping Report for six weeks.

The IA Scoping Report can be viewed on the council's website at https://www.oldham.gov.uk/downloads/download/1168/integrated_assessment_scoping_report

How to comment:

Comments are invited on the scope of the Local Plan and the IA Scoping Report over a six-week period from **10th July to 21st August 2017**.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments (on the scope of the Local Plan only) can be submitted online at <http://oldham-consult.limehouse.co.uk/portal/cc/planehq/sp/>

Alternatively, comments on the scope of the Local Plan and IA can be emailed to spi@oldham.gov.uk or returned by post to the following address no later than by **17:00 on 21st August 2017**:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation, your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response.

Other Local Plan Documents

Since we last contacted you, we have published Oldham's Monitoring Report 2015-16 which can be viewed on the council's website, in local libraries and at the Civic Centre planning reception.

Oldham's Monitoring Report 2015 - 16 provides details on whether the council is meeting the milestones set out in the LDS for preparing the various Local Plan documents. The Monitoring Report also monitors a range of planning indicators, such as housing, employment and biodiversity.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4061 or by email at spi@oldham.gov.uk.

Yours sincerely

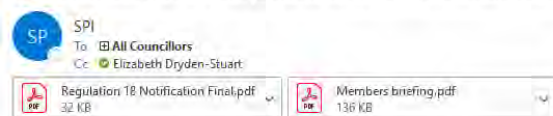
Stephen Irvine
Head of Planning and Infrastructure



Mon 10/07/2017 08:46

Appendix 1g: Copy of Regulation 18 Notification email to all Oldham Councillors

Re: Consultation on the subject and scope of the Oldham Local Plan (Regulation 18)



Dear Councillor,

Re: Consultation on the subject and scope of the Oldham Local Plan (Regulation 18)

Oldham Council is preparing a new Local Plan for the borough. This will replace the existing Local Plan (the 'Joint Core Strategy and Development Management Development Plan Document'), which was adopted November 2011.

What is a Local Plan?

The Local Plan will help to guide and manage future growth and development to meet the needs of Oldham and its population. The Local Plan will contain policies that will be used as the basis for determining planning applications and will identify sites, setting out where new development should be built as well as areas for protection. It is, therefore, essential that the Council continues to have an up to date Local Plan in order to provide for the proper planning of the area.

You are no doubt aware that together with the other authorities across Greater Manchester, Oldham Council is involved in the preparation of the Greater Manchester Spatial Framework. The approach set out within the emerging Local Plan will form an integral part of the Greater Manchester Spatial Framework.

Proposed Scope of the Oldham Local Plan

As a key early stage in the preparation of the Local Plan, we will be producing a report setting out the main issues that the Local Plan should be seeking to address and the reasonable options for addressing these.

To inform this work, we are seeking views about what the local community and stakeholders think:

- the Local Plan should contain and what are the key planning issues for Oldham; and
- what, in broad terms, should be the main aims of the Local Plan.

Further details regarding the Local Plan and its proposed scope can be found on the Regulation 18 Notification enclosed.

A short briefing note has also been attached providing further information regarding the purpose of the consultation, why we need to do it and its relationship with the emerging Greater Manchester Spatial Framework.

How to comment

Comments are invited on the scope of the Local Plan over a six-week period from **10th July to 21st August 2017**.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at <http://oldham-consult.limesurvey.co.uk/portal/oe/planning/spi/>

Alternatively, comments can be emailed to spi@oldham.gov.uk or returned by post to the following address no later than by 17:00 on **21st August 2017**:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Other Local Plan Documents

Since we last contacted you we have published Oldham's Monitoring Report 2015-16 which can be viewed on the council's website, in local libraries and at the Civic Centre planning reception.

Oldham's Monitoring Report 2015 - 16 provides details on whether the council is meeting the milestones set out in the LDS for preparing the various Local Plan documents. The Monitoring Report also monitors a range of planning indicators, such as housing, employment and biodiversity.

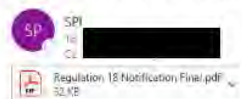
Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4061 or by email at spi@oldham.gov.uk.

Yours sincerely

Stephen Irvine
Head of Planning and Infrastructure

Appendix 1h: Copy of Regulation 18 Notification email to all the Oldham Partnership

Re: Consultation on the subject and scope of the Oldham Local Plan (Regulation 18)



Reply Reply All Forward

Mon 19/07/2017 08:56

Dear [redacted]

Note: Please forward this email on to relevant organisations to make them aware of the designation.

Oldham Council is preparing a new Local Plan for the borough. This will replace the existing Local Plan (the 'Joint Core Strategy and Development Management Development Plan Document'), which was adopted November 2011. Views are sought on what the Local Plan ought to contain.

What is a Local Plan?

The Local Plan will help to guide and manage future growth and development to meet the needs of Oldham and its population. The Local Plan will contain policies that will be used as the basis for determining planning applications and will identify sites, setting out where new development should be built as well as areas for protection. It is, therefore, essential that the Council continues to have an up to date Local Plan in order to provide for the proper planning of the area.

You are no doubt aware that together with the other authorities across Greater Manchester, Oldham Council is involved in the preparation of the Greater Manchester Spatial Framework (GMSF). The approach set out within the emerging Local Plan will form an integral part of the GMSF.

Proposed Scope of the Oldham Local Plan

As a key early stage in the preparation of the Local Plan, we will be producing a report setting out the main issues that the Local Plan should be seeking to address and the reasonable options for addressing these.

To inform this work we are seeking views what the local community and stakeholders think:

- the Local Plan should contain and what are the key planning issues for Oldham; and
- what, in broad terms, should be the main aims of the Local Plan.

Further details regarding the Local Plan and its proposed scope can be found on the Regulation 18 Notification attached.

How to comment

Comments are invited over a six-week period from **10th July to 21st August 2017**.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at <http://oldham-consult.timehouse.co.uk/postal/csrpsaunwqspw>.

Alternatively, comments can be emailed to spi@oldham.gov.uk or returned by post to the following address no later than by **17:00 on 21st August 2017**.

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation, your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response.

Other Local Plan Documents

Since we last contacted you, we have published Oldham's Monitoring Report 2015-16 which can be viewed on the council's website, in local libraries and at the Civic Centre planning reception.

Oldham's Monitoring Report 2015 - 16 provides details on whether the council is meeting the milestones set out in the LDS for preparing the various Local Plan documents. The Monitoring Report also monitors a range of planning indicators, such as housing, employment and biodiversity.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4061 or by email at spi@oldham.gov.uk.

Yours sincerely

Stephen Irvine
Head of Planning and Infrastructure

Appendix 1i: Copy of Regulation 18 Notification email / letter text to all 'others' on the Local Plan Mailing List

Re: Consultation on the subject and scope of the Oldham Local Plan (Regulation 18)



Dear Sir or Madam

Oldham Council is preparing a new Local Plan for the borough. This will replace the existing Local Plan (the 'Joint Core Strategy and Development Management Development Plan Document'), which was adopted November 2011.

What is a Local Plan?

The Local Plan will help to guide and manage future growth and development to meet the needs of Oldham and its population. The Local Plan will contain policies that will be used as the basis for determining planning applications and will identify sites, setting out where new development should be built as well as areas for protection. It is, therefore, essential that the Council continues to have an up to date Local Plan in order to provide for the proper planning of the area.

You are no doubt aware that, together with the other authorities across Greater Manchester, Oldham Council is involved in the preparation of the Greater Manchester Spatial Framework. The approach set out within the emerging Local Plan will form an integral part of the Greater Manchester Spatial Framework.

Proposed Scope of the Oldham Local Plan

As a key early stage in the preparation of the Local Plan, we will be producing a report setting out the main issues that the Local Plan should be seeking to address and the options for addressing these.

To inform this work we are seeking views about what the local community and stakeholders think:

- the Local Plan should contain and what are the key planning issues for Oldham; and
- what, in broad terms, should be the main aims of the Local Plan.

Further details regarding the Local Plan and its proposed scope can be found on the Regulation 18 Notification attached and on our website at https://www.oldham.gov.uk/info/200585/local_plan

How to comment

Comments are invited over a six-week period from 10th July to 21st August 2017.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at <http://oldham-consult.linthouse.co.uk/portal/00/planning/00/>

Alternatively, comments can be emailed to spi@oldham.gov.uk or returned by post to the following address no later than by 17:00 on 21st August 2017:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response.

Other Local Plan Documents

Since we last contacted you we have published Oldham's Monitoring Report 2015-16 which can be viewed on the council's website, in local libraries and at the Civic Centre planning reception.

Oldham's Monitoring Report 2015 - 16 provides details on whether the council is meeting the milestones set out in the LDS for preparing the various Local Plan documents. The Monitoring Report also monitors a range of planning indicators, such as housing, employment and biodiversity.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4061 or by email at spi@oldham.gov.uk.

Yours sincerely

Stephen Irvine
Head of Planning and Infrastructure

Appendix 1j: Copy of Regulation 18 Notification and Integrated Assessment Scoping Report email / letter text sent to the 'prescribed consultation bodies'

Re: Consultation on the subject and scope of the Oldham Local Plan (Regulation 18) and Integrated Assessment Scoping Report



The Local Plan will be supported by an Integrated Assessment (IA). The IA will include the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and a Health Impact Assessment (HIA). The Habitats Regulations Assessment (HRA) will still be a standalone document. However, its findings will be integrated into the IA. The scope of these assessments is explained in more detail in the IA Scoping Report.

The role of an IA is to promote sustainable development through assessing the emerging local plan against economic, environmental and social objectives. It is a way of ensuring that the preferred approach in the plan is the most appropriate when assessed against any reasonable alternatives. It also allows for any potential adverse effects to be identified and mitigated and for improvements to environmental, social and economic conditions to be made.

The Scoping Report is the first stage of the IA process. It identifies the scope and level of detail to be included in the IA report. The Scoping Report sets out the context and identifies relevant environmental, economic and social issues, objectives and an assessment framework.

Stage A (Setting the context and objectives, establishing the baseline and deciding on the scope) involves the following tasks:

1. Identify other relevant policies, plans and programmes and strategies;
2. Collect baseline information;
3. Identify sustainability, health and equality issues;
4. Develop the IA appraisal framework; and
5. Consult the consultation bodies on the scope of the IA report.

The council has prepared an IA Scoping Report to satisfy Stage A. The IA Scoping Report has been structured to include a section on each of the above tasks.

The council is now required to consult the following three consultation bodies on the Scoping Report for a minimum of five weeks:

- Historic England;
- Natural England; and
- Environment Agency.

As one of the three consultation bodies we request your comments on the scope of the IA.

The IA Scoping Report can be viewed on the council's website at https://www.oldham.gov.uk/downloads/download/1168/integrated_assessment_scoping_report

How to comment:

Comments are invited on the scope of the Local Plan and the IA Scoping Report over a six-week period from **10th July to 21st August 2017**.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments (on the scope of the Local Plan only) can be submitted online at <http://oldham-consult.limehouse.co.uk/portal/oc/planning/spi/>

Alternatively, comments on the scope of the Local Plan and IA can be emailed to spi@oldham.gov.uk or returned by post to the following address no later than by **17:00 on 21st August 2017**:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation, your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response.

Other Local Plan Documents

Since we last contacted you we have published Oldham's Monitoring Report 2015-16 which can be viewed on the council's website, in local libraries and at the Civic Centre planning reception.

Oldham's Monitoring Report 2015 - 16 provides details on whether the council is meeting the milestones set out in the LDS for preparing the various Local Plan documents. The Monitoring Report also monitors a range of planning indicators, such as housing, employment and biodiversity.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4061 or by email at spi@oldham.gov.uk.

Yours sincerely

Stephen Irvine
Head of Planning and Infrastructure

Appendix 2 – Issues and Options Consultation

Appendix 2a – Copy of Issues and Options Public Notice

OLDHAM COUNCIL LOCAL PLAN REVIEW
The TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012 (AS AMENDED)
(REGULATION 18)

OLDHAM LOCAL PLAN: ISSUES AND OPTIONS

Statement of Availability

Document Title

Oldham Local Plan: Issues and Options

Subject Matter

Oldham Council is preparing a new Local Plan to replace the existing Joint Core Strategy and Development Management Policies Development Plan Document adopted November 2011. Views are sought on the Issues and Options for the Local Plan and its supporting documents.

What is a Local Plan?

A Local Plan is a plan that is drawn up to guide and manage future growth and development (such as housing, offices, industry, warehousing and retail). It contains planning policies that will be used as the basis for determining planning applications and identifies sites where development should be permitted as well as areas where development should be restricted. It is essential that the council continues to have an up-to-date statutory development plan in order to provide for the proper planning of the area.

Places for Everyone Joint Development Plan Document (PfE) is being jointly prepared by nine of the Greater Manchester local authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). Upon adoption, PfE will form part of the Local Plan for Oldham. Please note: PfE and allocations included within it, are not being consulted on as part of the Local Plan Issues and Options.

The Local Plan will cover the whole borough except the part that falls within the Peak District National Park.

Availability of Documents:

The Issues and Options Report, together with supporting documents: Integrated Assessment (including the Equalities Impact Assessment), Habitats Regulations Assessment and Regulation 18 Summary of Comments received and the Council's Response can all be viewed on the council's website:

https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation

In addition, where open, hard copies will be placed in the borough's libraries. Please note that due to coronavirus restrictions the number of libraries open and their opening hours are subject to change. For the latest details on which libraries are open and their opening hours please visit:

https://www.oldham.gov.uk/info/201170/coronavirus_update_and_advice/2432/coronavirus_libraries

You can also arrange to view a copy at the Civic Centre – please phone 0161 770 4105 to make an appointment or email SPL.Consultations@oldham.gov.uk.

How to Comment:

The Issues and Options Report, together with its supporting documents is subject to an eight-week consultation period that runs from 5th July until 29th August 2021.

The council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at <http://oldham.objective.co.uk/portal/>

Alternatively, comments can be emailed to SPI.Consultations@oldham.gov.uk;

Or, addressed to

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Comments on the Issues and Options Report, and / or its supporting documents, must be received by 5.00 pm on 29th August 2021

Please note all comments will be held by the council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

If you require further information about this consultation, please contact the Strategic Planning and Information section via telephone on 0161 770 4105 or by email at SPI.Consultations@oldham.gov.uk.

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OLDHAM COUNCIL LOCAL PLAN REVIEW
The TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (AS AMENDED) (REGULATION 18)
OLDHAM LOCAL PLAN: ISSUES AND OPTIONS
Statement of Availability

Document Title:
Oldham Local Plan Issues and Options
Subject Matter:
Oldham Council is preparing a new Local Plan to replace the existing 2011 Core Strategy and Development Management Policies. The Development Plan Document adopted November 2011, there are elements on the Issues and Options for the Local Plan and its supporting documents.

What is a Local Plan?
A Local Plan is a plan that is drawn up to guide and manage future growth and development north of Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). Upon adoption, PPG will have part of the Local Plan for Oldham. Please note PPG and documents included below, are not being consulted on as part of the Local Plan Issues and Options.

The Local Plan will cover the whole borough except the part that falls within the Peak District National Park.

Availability of Documents:
The Issues and Options Report, together with supporting documents, Strategic Assessment (including the Equalities Impact Assessment), Planning Regulations Assessment and Paragraph 18 Summary of Comments received and the Council's Response can all be viewed on the council's website: https://www.oldham.gov.uk/info/200164/local_plan/1825/consultation.

In addition, where open, hard copies will be placed in the borough's libraries. Please note that due to coronavirus restrictions the number of libraries open and their opening hours are subject to change. For the latest details on which libraries are open and their opening hours please visit https://www.oldham.gov.uk/info/201170/coronavirus_2020_and_advice/2432/coronavirus_libraries.

You can also arrange to view a copy at the Civic Centre – please phone 0161 770 4100 to make an appointment or email SPL.Consultations@oldham.gov.uk.

How to Comment:
The Issues and Options Report, together with its supporting documents is subject to an eight-week consultation period that runs from 1st July until 29th August 2021.

The council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at <http://oldham.objectiv.co.uk/portal/>.

Alternatively, comments can be emailed to SPL.Consultations@oldham.gov.uk, Or, addressed to:
Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Comments on the Issues and Options Report, and / or its supporting documents, must be received by 5.00 pm on 29th August 2021.

Please note all comments will be held by the council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

If you require further information about this consultation, please contact the Strategic Planning and Information section via telephone on 0161 770 4100 or by email at SPL.Consultations@oldham.gov.uk.

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Appendix 2c – Copy of the Issues and Options Press Release

Have your say on the future of planning and development in Oldham

Published: Monday, 05th July 2021

People across Oldham are urged to take part in a new consultation which will help to shape the future of planning and development across the borough.

The Local Plan will guide development in Oldham up to 2037 setting the rules with which new homes and industrial buildings have to comply, and establishing where they can be built. It will also guide how we make decisions on whether or not planning applications can be granted.

To ensure the plan reflects what is most important to residents, Oldham Council has launched an 'Issues and Options' consultation.

Cllr Hannah Roberts, Cabinet Member for Housing and Planning, said: "Planning affects many aspects of our lives and our environment – from where we live, work, shop and how we spend our leisure time.

"In producing the Local Plan, we will not just consider land uses but we will also consider other issues that can be affected by land use, including health, education and community safety. It is important we get a wide range of opinions and views so that we can create the most effective plan possible."

In particular we would like your views on:

The issues Oldham, and your particular area of the borough, faces;

- What kind of place you would like Oldham to be in 15 years; and
- Specific areas of planning, such as the location of future development, design of new buildings and protection of our open spaces.
- The Local Plan complements Places for Everyone (formerly Greater Manchester Strategic Framework) - our strategic plan for housing and growth - by defining what will be approved and rejected.

We want to know what matters most to our residents and businesses so that we have the buildings, homes and jobs that work for Oldham.

Issues addressed by the consultation reflect a previous community consultation on the developing Local Plan. Key considerations that we would like your thoughts on include:

- What homes we need for an ageing population
- How we provide a diverse housing offer including homes for disabled people, families, affordable homes and private rented homes
- Whether we should amend planning policy for homes in multiple occupation (HMOs) so that they can no longer be developed without planning permission (permitted development rights)
- Our policy approach to self-build, custom build and community right to build
- Providing for children's homes
- Making the most effective use of land and the density of developments
- Allocation of sites for development
- Retail, leisure, cultural venues, tourism and policies on farm diversification

- Steps we can take to address sustainable development including renewable and low carbon energy
- How we address flood risk
- Protecting and enhancing local green spaces, green infrastructure, open space, trees and biodiversity
- The policy approach to mills

Policies which address the design of buildings including provision for bike and bin storage and electric vehicle charging

Health and wellbeing including whether we should introduce a policy which restricts the location of hot food takeaways within 400m of a school; or in areas with high levels of obesity; or both

How planning can support education provision and if we should protect some suitable sites for potential future education facilities/services.

The Local Plan Issues and Options consultation is open now until 5pm on 29th August 2021 and you can feedback on as many or as few points as you like.

If you can, please submit comments via

https://oldham.objective.co.uk/portal/oc/planning/spi/local_plan_review/io2021/ where you can find full details of the consultation. Alternatively, you can email your comments to SPI.Consultations@oldham.gov.uk.

The above documents can all be viewed on the council's website at www.oldham.gov.uk/localplanreview. Consultation documents will also be available to view at all public libraries in Oldham. Visit oldham.gov.uk/libraries for opening times.

You can also arrange to view a copy at the Civic Centre – please phone 0161 770 4105 to make an appointment or email SPI.Consultations@oldham.gov.uk.

If you are unable to submit comments online or via email, you can send them in writing, to be received by 5pm 29th August 2021, to:

Strategic Planning and Information, Economy, Skills and Neighbourhoods, Room 310, Level 3, Civic Centre, West Street, Oldham, OL1 1UH

Please note all comments received (both electronically and by post) will be held by the council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.



Share your views

Consultation on Oldham's Local Plan

Take part in our consultation and help shape planning and development in Oldham over the next 15 years.

The Local Plan is an important document which guides planning and development including how and where things are built and how planning applications are decided.

We're preparing a new Local Plan and want you to help us develop it by telling us what matters most to you when it comes to the future development of your town.

The Local Plan will help to set the rules with which new homes and industrial buildings have to comply, and establish where they can be built. It will boost health and well-being for our residents, support investment in our centres and make the most of the assets that make Oldham unique.

Find out more and take part at www.oldham.gov.uk/localplanreview

What is a Local Plan and why are you reviewing it?

The council has to prepare a Local Plan to set the rules with which new homes and industrial buildings have to comply, and establish where they can be built. The current local plan is reaching the end of its lifespan.

The Local Plan addresses issues that are specific to Oldham.

Planning affects many aspects of our lives and our environment – from where we live, work, shop and how we spend our leisure time. In producing the Local Plan, we will not just consider land uses but we will also consider other issues that can be affected by land use, including health, education and community safety.

What are the issues and options?

You can either answer specific questions set out in the online consultation or share your views on any or all of the topics in the consultation – some of which are listed below:

- What homes we need for an ageing population
- How we provide a diverse housing offer including homes for disabled people, families, affordable homes and private rented homes
- Whether we should amend planning policy for homes in multiple occupation (HMOs) so that they can no longer be developed without planning permission (permitted development rights)
- Our policy approach to self-build, custom build and community right to build
- Providing for children's homes
- Making the most effective use of land and the density of developments
- Allocation of sites for development
- Retail, leisure, cultural venues, tourism and policies on farm diversification
- Steps we can take to address sustainable development including renewable and low carbon energy
- How we address flood risk
- Protecting and enhancing local green spaces, green infrastructure, open space, trees and biodiversity

- The policy approach to mills
- Policies which address the design of buildings including bike and bin storage and electric vehicle charging
- Health and wellbeing including whether we should introduce a policy which restricts the location of hot food takeaways within 400m of a school; or in areas with high levels of obesity; or both
- How planning can support education provision and if we should protect some suitable sites for potential future education facilities/services.

The consultation closes at 5pm on 29 August 2021.

Share your views and help make Oldham a thriving place.

How do I take part?

Go online:
www.oldham.gov.uk/localplanreview

email:
SPI.Consultations@oldham.gov.uk

Write to:
Strategic Planning and Information,
Economy, Skills and Neighbourhoods,
Room 310 Civic Centre,
West Street, Oldham
OL1 1UH

Scan the QR Code:



Memo

To	All Libraries	Date	5 th July 2021
From	Simon Rowberry	Ext	4105
Subject	Consultation on the Oldham Local Plan: Issues and Options		

This memo outlines details of a planning consultation and asks if you could help publicise it.

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 planning policies from the Unitary Development Plan (UDP) 2006.

Underpinning the plan will be the principles of sustainable development, it will meet the needs of Oldham and its residents while also achieving high quality design, addressing climate change and increasing accessibility for all.

What is a Local Plan?

A Local Plan is a plan that is drawn up to guide and manage future growth and development (such as housing, offices, industry, warehousing and retail). It contains planning policies that will be used as the basis for determining planning applications and identifies sites where development should be permitted as well as areas where development should be restricted.

It is essential that the council continues to have an up-to-date statutory development plan in order to provide for the proper planning of the area.

The Local Plan must conform with Places for Everyone Joint Development Plan Document (PfE). PfE is being jointly prepared by nine of the Greater Manchester local authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). Upon adoption, PfE will form part of the Local Plan for Oldham. Please note: PfE and allocations included within it, are not being consulted on as part of the Local Plan Issues and Options.

The Local Plan will cover the whole borough except the part that falls within the Peak District National Park.

What is the Issues and Options stage?

The document we are seeking views on is called Issues and Options and follows on from the consultation that was carried out in the summer of 2017, called the 'Regulation 18 Notification'. The comments we received from so many residents and businesses have been invaluable in helping us identify the issues that the Local Plan needs to address in this

Issues and Options document. Emerging evidence has also helped to shape to Issues and Options document.

We have published a consultation statement – summarising the comments received in 2017 and how we have addressed the key issues raised (Regulation 18 Notification Summary of Comments Received and the Council's Response).

The Issues and Options document describes the key challenges facing Oldham, sets out broad issues and presents options and questions that we need residents, businesses and interested parties in the borough to help us answer.

What are we asking in this consultation?

We welcome comments on any part of the Issues and Options document. However, to guide and get the most from the consultation we have asked specific questions and presented spatial options within the document that we would like responses on.

The Issues and Options is supported by the following documents, which comments are invited on:

- Integrated Assessment (including the Equalities Impact Assessment and Health Impact Assessment);
- Integrated Assessment Scoping Report Update 1; and
- Habitats Regulations Assessment.

Further details regarding the Local Plan Issues and Options consultation can be found on the Statement of Availability attached.

The above documents can all be viewed on the council's consultation portal https://oldham.objective.co.uk/portal/oc/planning/spi/local_plan_review/io2021/ and on the council's website at: <https://www.oldham.gov.uk/localplanreview>.

Topic papers and evidence are also available on the council's website.

Please display the following documents until 5pm on 29th August 2021 for members of the public to view:

- Statement of Availability
- Oldham Local Plan Review: Issues and Options
- Oldham Local Plan Review: Issues and Options Appendices
- Integrated Assessment (including the Equalities Impact Assessment and Health Impact Assessment)
- Integrated Assessment Scoping Report Update 1
- Habitats Regulations Assessment
- Regulation 18 Notification Summary of Comments Received and the Council's Response

Place Standard:

In addition to the Issues and Options documents we are also using a Place Standard tool as a way of engaging with the community. This is supplementary to the Issues and Options consultation documents.

The Place Standard can assist the council and the community to have an improved understanding of local aspirations and to target services, facilities and infrastructure in response. This will help to align community and land use planning to achieve better outcomes. The Place Standard is not a formal way of restricting development.

Completion of the Place Standard tool must take place by **5pm on 29th August 2021**.

For further information on the Place Standards and how to complete please visit:
<https://www.oldham.gov.uk/localplanreview>.

How to comment

The Issues and Options report, together with its supporting documents is subject to an eight-week consultation period that runs from **5th July** until **29th August 2021**.

The council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at
https://oldham.objective.co.uk/portal/oc/planning/spi/local_plan_review/io2021/.

Alternatively, comments can be emailed to SPI.Consultations@oldham.gov.uk;

Or addressed to:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Comments on the Issues and Options Report, and / or its supporting documents, must be received by **5pm on 29th August 2021**.

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. If you wish to be added to or removed from the mailing list please visit https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation or contact us via the details below.

Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the council's website at
https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at SPI.Consultations@oldham.gov.uk.

Once again, thanks for your help in assisting us with getting people's views on planning issues.

Yours sincerely

Simon Rowberry,
Interim Head of Planning

Appendix 2f – Copy of email / letter text sent to all relevant Statutory Consultees, all Oldham Councillors and relevant parties on the Local Plan mailing list

Consultation on the Oldham Local Plan: Issues and Options



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 planning policies from the Unitary Development Plan (UDP) 2006

Underpinning the plan will be the principles of sustainable development, it will meet the needs of Oldham and its residents while also achieving high quality design, addressing climate change and increasing accessibility for all

What is a Local Plan?

A Local Plan is a plan that is drawn up to guide and manage future growth and development (such as housing, offices, industry, warehousing and retail). It contains planning policies that will be used as the basis for determining planning applications and identifies sites where development should be permitted as well as areas where development should be restricted.

It is essential that the council continues to have an up-to-date statutory development plan in order to provide for the proper planning of the area.

The Local Plan must conform with Places for Everyone Joint Development Plan Document (PJED). PJED is being jointly prepared by nine of the Greater Manchester local authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). Upon adoption, PJED will form part of the Local Plan for Oldham. Please note: PJED and allocations included within it, are not being consulted on as part of the Local Plan Issues and Options.

The Local Plan will cover the whole borough except the part that falls within the Peak District National Park.

What is the Issues and Options stage?

The document we are seeking views on is called Issues and Options and follows on from the consultation that was carried out in the summer of 2017, called the 'Regulation 18 Notification'. The comments we received from so many residents and businesses have been invaluable in helping us identify the issues that the Local Plan needs to address in this Issues and Options document. Emerging evidence has also helped to shape to Issues and Options document.

We have published a consultation statement – summarising the comments received in 2017 and how we have addressed the key issues raised (Regulation 18 Notification Summary of Comments Received and the Council's Response). This can be viewed on the council's website at https://www.oldham.gov.uk/info/200199/planning_and_building/1809/local_plan_review and at public libraries (please check opening times).

The Issues and Options document describes the key challenges facing Oldham, sets out broad issues and presents options and questions that we need residents, businesses and interested parties in the borough to help us answer.

What are we asking in this consultation?

We welcome comments on any part of the Issues and Options document. However, to guide and get the most from the consultation we have asked specific questions and presented spatial options within the document that we would like responses on.

The Issues and Options is supported by the following documents, which comments are invited on:

- Integrated Assessment (including the Equalities Impact Assessment and Health Impact Assessment);
- Integrated Assessment Scoping Report Update 1; and
- Habitats Regulations Assessment.

Further details regarding the Local Plan Issues and Options consultation can be found on the Statement of Availability attached.

The above documents can all be viewed on the council's consultation portal https://oldham.objective.co.uk/portal/co/planning/spi/local_plan_review/2021 and on the council's website at <https://www.oldham.gov.uk/localplanreview>

Topic papers and evidence are also available on the council's website.

In addition, where open, hard copies will be placed in the borough's libraries. Please note that due to coronavirus restrictions the number of libraries open and their opening hours are subject to change. For the latest details on which libraries are open and their opening hours please visit: https://www.oldham.gov.uk/info/201170/coronavirus_update_and_advice/2432/coronavirus_libraries

Consultation on the Oldham Local Plan: Issues and Options



SPI Consultations

To
Cc Georgina Brownridge



Issues and Options Public Notice.pdf
.pdf File



Local Plan Consultation A5.pdf
.pdf File

https://www.oldham.gov.uk/info/2/11/1/coronavirus_update_and_advice/244/coronavirus_updates

You can also arrange to view a copy at the Civic Centre – please phone 0161 770 4105 to make an appointment or email SPI.Consultations@oldham.gov.uk.

Place Standard:

In addition to the Issues and Options documents we are also using a Place Standard tool as a way of engaging with the community. This is supplementary to the Issues and Options consultation documents.

The Place Standard can assist the council and the community to have an improved understanding of local aspirations and to target services, facilities and infrastructure in response. This will help to align community and land use planning to achieve better outcomes. The Place Standard is not a formal way of restricting development.

Completion of the Place Standard tool must take place by **5pm on 29th August 2021**.

For further information on the Place Standards and how to complete please visit: <https://www.oldham.gov.uk/localplanreview>.

How to comment

The Issues and Options report, together with its supporting documents is subject to an eight-week consultation period that runs from **5th July** until **29th August 2021**.

The council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at https://oldham.objectiva.co.uk/portal/oc/planning/sp/local_plan_review/2021/.

Alternatively, comments can be emailed to SPI.Consultations@oldham.gov.uk.

Or addressed to:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Comments on the Issues and Options Report, and / or its supporting documents, must be received by **5pm on 29th August 2021**.

Please note all comments will be held by the council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. If you wish to be removed from the mailing list please visit https://www.oldham.gov.uk/info/2/00585/local_plan/1825/consultation or contact us via the details below.

Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the council's website at https://www.oldham.gov.uk/info/2/00585/local_plan/1825/consultation.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at SPI.Consultations@oldham.gov.uk.

Simon Rowberry
Interim Head of Planning



Reply

Reply All

Forward

...

Mon 05/07/2021 13:51

Appendix 2g – Copy of email sent to representative of the Oldham Partnership

Consultation on the Oldham Local Plan: Issues and Options

Joanne Blair
To: [REDACTED]
Cc: [REDACTED]

Issues and Options Public Notice.pdf
Local Plan Consultation A5.pdf

Note: Please feel free to pass on details of this consultation to your partners and customers.

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 planning policies from the Unitary Development Plan (UDP) 2006.

Underpinning the plan will be the principles of sustainable development. It will meet the needs of Oldham and its residents while also achieving high quality design, addressing climate change and increasing accessibility for all.

What is a Local Plan?

A Local Plan is a plan that is drawn up to guide and manage future growth and development (such as housing, offices, industry, warehousing and retail). It contains planning policies that will be used as the basis for determining planning applications and identifies sites where development should be permitted as well as areas where development should be restricted.

It is essential that the council continues to have an up-to-date statutory development plan in order to provide for the proper planning of the area.

The Local Plan must conform with Places for Everyone Joint Development Plan Document (PJED). PJED is being jointly prepared by nine of the Greater Manchester local authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). Upon adoption, PJED will form part of the Local Plan for Oldham. Please note: PJED and allocations included within it, are not being consulted on as part of the Local Plan Issues and Options.

The Local Plan will cover the whole borough except the part that falls within the Peak District National Park.

What is the Issues and Options stage?

The document we are seeking views on is called Issues and Options and follows on from the consultation that was carried out in the summer of 2017, called the 'Regulation 18 Notification'. The comments we received from so many residents and businesses have been invaluable in helping us identify the issues that the Local Plan needs to address in this Issues and Options document. Emerging evidence has also helped to shape to Issues and Options document.

We have published a consultation statement – summarising the comments received in 2017 and how we have addressed the key issues raised (Regulation 18 Notification Summary of Comments Received and the Council's Response). This can be viewed on the council's website at https://www.oldham.gov.uk/info/200199/planning_and_building/180/local_plan_review and at public libraries (please check opening times).

The Issues and Options document describes the key challenges facing Oldham, sets out broad issues and presents options and questions that we need residents, businesses and interested parties in the borough to help us answer.

What are we asking in this consultation?

We welcome comments on any part of the Issues and Options document. However, to guide and get the most from the consultation we have asked specific questions and presented spatial options within the document that we would like responses on.

The Issues and Options is supported by the following documents, which comments are invited on:

- Integrated Assessment (including the Equalities Impact Assessment and Health Impact Assessment);
- Integrated Assessment Scoping (Report Update 1); and
- Habitats Regulations Assessment.

Further details regarding the Local Plan Issues and Options consultation can be found on the Statement of Availability attached.

The above documents can all be viewed on the council's consultation portal https://oldham.cbractive.co.uk/portal/consultation/local_plan_update2021/ and on the council's website at <https://www.oldham.gov.uk/local-plan-review>.

Topic papers and evidence are also available on the council's website.

In addition, where open, hard copies will be placed in the borough's libraries. Please note that due to coronavirus restrictions the number of libraries open and their opening hours are subject to change. For the latest details on which libraries are open and their opening hours please visit: https://www.oldham.gov.uk/info/201176/coronavirus_updates_and_advice/24322/opening-hours-libraries.

You can also arrange to view a copy at the Civic Centre – please phone 0161 770 4105 to make an appointment or email 3PI.Consultations@oldham.gov.uk.

Place Standard:

In addition to the Issues and Options documents we are also using a Place Standard tool as a way of engaging with the community. This is supplementary to the Issues and Options consultation documents.

The Place Standard can assist the council and the community to have an improved understanding of local aspirations and to target services, facilities and infrastructure in response. This will help to align community and land use planning to achieve better outcomes. The Place Standard is not a formal way of restricting development.

Completion of the Place Standard tool must take place by 5pm on 29th August 2021.

For further information on the Place Standards and how to complete please visit: <https://www.oldham.gov.uk/localplanreview>.

How to comment

The Issues and Options report, together with its supporting documents is subject to an eight-week consultation period that runs from 5th July until 29th August 2021.

The council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online at https://oldham.objective.co.uk/portal/oc/planning/spi/local_plan_review/fo2021/.

Alternatively, comments can be emailed to SPI.Consultations@oldham.gov.uk.

Or addressed to:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Comments on the Issues and Options Report, and / or its supporting documents, must be received by 5pm on 29th August 2021.

Please note all comments will be held by the council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. If you wish to be removed from the mailing list please visit https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation or contact us via the details below.

Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the council's website at https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at SPI.Consultations@oldham.gov.uk.

Simon Rowberry
Head of Service

Appendix 3 – Draft Local Plan Consultation

Appendix 3a – Copy of Draft Local Plan Public Notice

**OLDHAM COUNCIL LOCAL PLAN REVIEW
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012 (AS AMENDED)
(REGULATION 18)**

DRAFT OLDHAM LOCAL PLAN

Statement of Availability

Document Title

Draft Oldham Local Plan

Subject Matter

Oldham Council is preparing a new Local Plan to replace the existing Joint Core Strategy and Development Management Policies Development Plan Document adopted November 2011. Views are sought on the Draft Oldham Local Plan and its supporting documents.

What is a Local Plan?

A Local Plan is a plan that is drawn up to guide and manage future growth and development (such as housing, offices, industry, warehousing and retail). It contains planning policies that will be used as the basis for determining planning applications and identifies sites where development should be permitted as well as areas where development should be restricted. It is essential that the Council continues to have an up-to-date statutory development plan in order to provide for the proper planning of the area.

The Local Plan will cover the whole borough except the part that falls within the Peak District National Park.

Availability of Documents:

The Draft Oldham Local Plan and supporting documents, including the Integrated Assessment (incorporating the Habitats Regulations Assessment) and the Regulation 18 Issues and Options Comments and Response Schedule can all be viewed on the council's website at https://www.oldham.gov.uk/info/201233/local_plan_review.

Hard copies of the Draft Local Plan and supporting documents can be found at:

- the borough's libraries (for the latest details on library opening times please visit https://www.oldham.gov.uk/info/200395/find_a_library); and
- the Council's Access Oldham reception at the Civic Centre, West Street, Oldham.

Drop-in sessions are to be held across the borough where you also be able to find out more about the Draft Oldham Local Plan. Details of the drop-in sessions will be published on the Council's website at <https://www.oldham.gov.uk/localplanreview>.

How to Comment:

Consultation on the Draft Oldham Local Plan and supporting documents is taking place from **10 January to 23:59 on 21 February 2024**, for a period of 6 weeks.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Please visit the Council's website at <https://www.oldham.gov.uk/localplanreview> for details on how to respond online.

Alternatively, comments can be emailed to SPI.Consultations@oldham.gov.uk

Or addressed to:

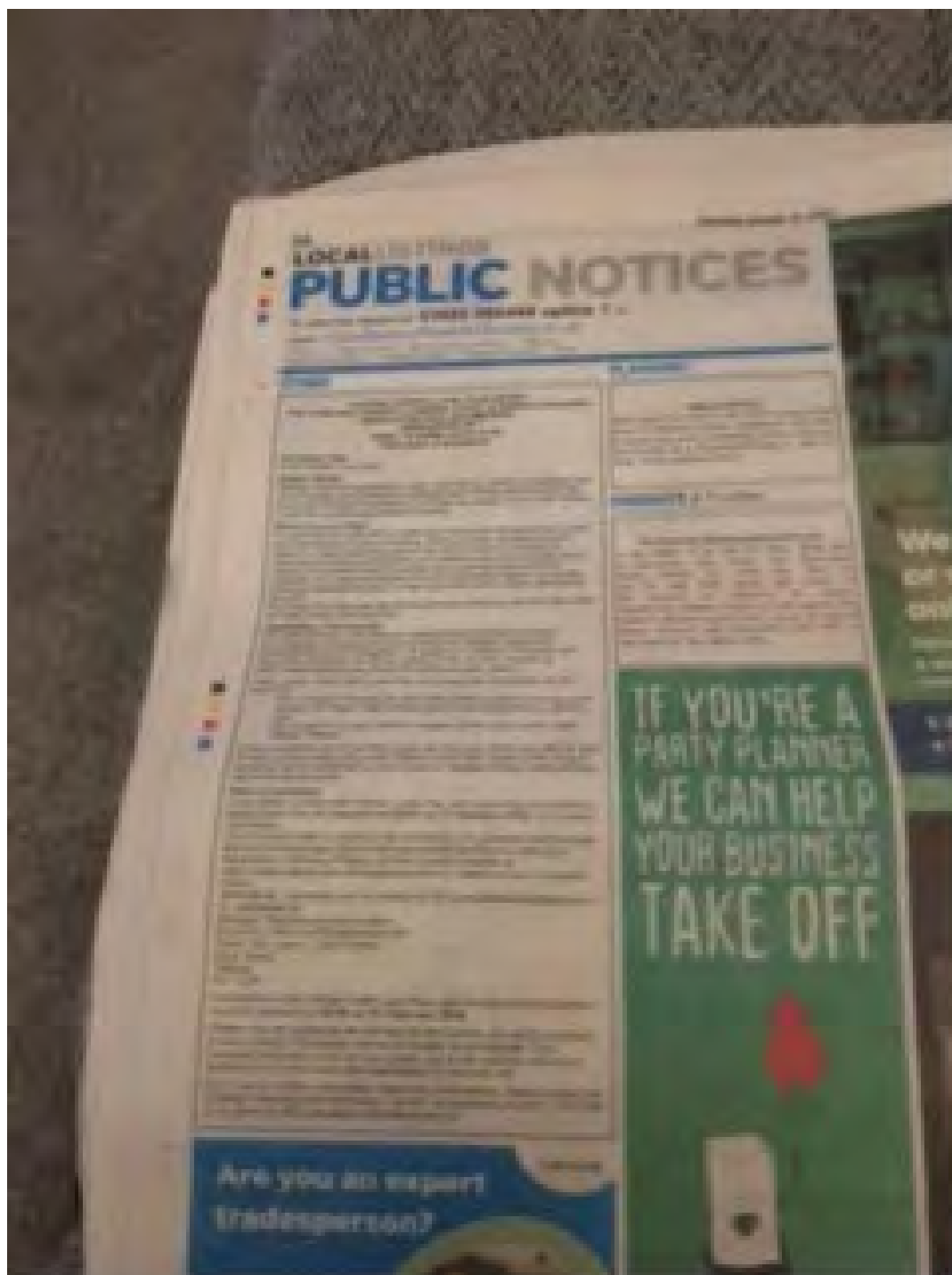
Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

Comments on the Oldham Draft Local Plan, and its supporting documents, must be received by **23:59 on 21 February 2024**.

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

If you require further information about this consultation, please contact the Strategic Planning and Information section via telephone on 0161 770 4105 or by email at SPI.Consultations@oldham.gov.uk.

Appendix 3b – Copy of Draft Local Plan Public Notice in Oldham Times 11th January 2024



12 Jan 2024

Have your say on plans for Oldham's future



A consultation has opened giving people across the borough the chance to have their say on how Oldham should develop in the future.

The council is preparing a new Local Plan – a document which will guide and manage growth and developments, such as housing, the local economy and community facilities, up to 2039.

Through previous consultations, people across the borough have been helping us to develop the plan. It is now at draft plan stage – and once again, we want you to share your views.

Cllr Elaine Taylor, Cabinet Member for Housing and Licensing, said: “The Local Plan is a really important document that will shape the future of Oldham for the next 15 years, including how we make decisions on planning applications.

“The home you live in, the building where you work, your local supermarket – all of these developments at some point will have been through the planning process.

“Planning affects many aspects of our lives, and this consultation is an opportunity for you tell us what you think about the policies in the Draft Plan and to help shape the future of your town.”

The Local Plan includes policies to protect the environment, address climate change and increase accessibility for all residents.

It will also help to develop supporting infrastructure, such as transport, education and utilities.

We want to know what matters most to our residents and businesses so that we have the buildings, homes and jobs that work for Oldham.

You can share your views on a wide range of topics including:

- Built environment
- Climate change and flood risk
- Communities
- Employment and economy
- Housing
- Natural environment
- Our centres
- Transport

The Local Plan is being prepared alongside Places for Everyone (PfE) – the long-term plan of nine Greater Manchester councils for jobs, homes and sustainable growth.

The Local Plan will ‘sit under’ PfE, addressing policies not covered by the framework, providing more detail on Oldham’s local planning priorities.

The Draft Local Plan Consultation is open now until 21 February 2024.

The easiest way to have your say is by taking part online via our consultation portal, [Big Oldham Conversation](#).

We'll also be hosting a number of drop-in sessions where you can get more information and share your views in person. Keep an eye on our social media pages and www.oldham.gov.uk/localplanreview for details of these sessions including dates, times and venues.

Alternatively, comments can be emailed to SPI.Consultations@oldham.gov.uk or addressed to:

Strategic Planning and Information

Economy, Skills and Neighbourhoods

Room 310, Level 3

Civic Centre

West Street

Oldham

OL1 1UH

Share your views – Consultation on Oldham's Local Plan



Take part in our consultation and help shape planning and development in Oldham over the next 15 years.

The Local Plan is an important document which guides planning and development including how and where things are built and how planning applications are decided.

We're preparing a new Local Plan and want you to help us develop it by telling us what matters most to you when it comes to the future development of your town.

The Local Plan will help to set the rules with which new homes and industrial buildings have to comply, and establish where they can be built. It will boost health and well-being for our residents, support investment in our centres and make the most of the assets that make Oldham unique.

Find out more and take part at
www.oldham.gov.uk/localplanreview

What is a Local Plan and why are you reviewing it?

The council has to prepare a Local Plan to set the rules with which new homes and industrial buildings have to comply and establish where they can be built. The current local plan is reaching the end of its lifespan.

The Local Plan addresses issues that are specific to Oldham.

Planning affects many aspects of our lives and our environment – from where we live, work, shop and how we spend our leisure time. In

producing the Local Plan, we will not just consider land uses but we will also consider other issues that can be affected by land use, including, health, education and community safety.

What are the issues and options

You can either answer specific questions set out in the online consultation or share your views on any or all of the topics in the consultation - some of which are listed below:

- What homes we need for an ageing population

- How we provide a diverse housing offer including homes for disabled people, families, affordable homes and private rented homes
- Whether we should amend planning policy for homes in multiple occupation (HMOs) so that they can no longer be developed without planning permission (permitted development rights)
- Our policy approach to self-build, custom build and community right to build
- Providing for children's homes
- Making the most effective use of land and the density of developments
- Allocation of sites for development
- Retail, leisure, cultural venues, tourism and policies on farm diversification
- Steps we can take to address sustainable development including renewable and low carbon energy
- How we address flood risk
- Protecting and enhancing local green spaces, green, infrastructure, open space, trees and biodiversity
- The policy approach to mills
- Policies which address the design of buildings including bike and bin storage and electric vehicle charging
- Health and wellbeing including whether we should introduce a policy which restricts the location of hot food takeaways within 400m of a school; or in areas with high levels of obesity; or both
- How planning can support education provision and if we should protect some suitable sites for potential future education facilities/services.

How do I take part?

Online:

www.oldham.gov.uk/localplanreview

email:

SPI.Consultations@oldham.gov.uk

Write to: Strategic Planning and Information, Economy, Skills and Neighbourhoods, Room 310 Civic Centre, West Street, Oldham, OL1 1UH

The consultation closes at 5pm on 29 August 2021

Share your views and help make Oldham a thriving place.



Appendix 3e – Copy of memo sent to all libraries with instructions for how to display Draft Local Plan material

To	All Libraries	Date	9 January 2024
From	Peter Richards	Ext	4105
Subject	Consultation on the Oldham Draft Local Plan		

This memo outlines details of a planning consultation and asks if you could help publicise it.

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 planning policies from the Unitary Development Plan (UDP) 2006.

What is a Local Plan?

A Local Plan is a plan that is drawn up to guide and manage future growth and development (such as housing, offices, industry, warehousing and retail). It contains planning policies that will be used as the basis for determining planning applications and identifies sites where development should be permitted as well as areas where development should be restricted.

It is essential that the council continues to have an up-to-date statutory development plan to provide for the proper planning of the area.

Underpinning the plan will be the principles of sustainable development, it will meet the needs of Oldham and its residents while also achieving high quality design, addressing climate change and increasing accessibility for all.

The Local Plan will cover the whole borough except the part that falls within the Peak District National Park.

What is the Draft Plan stage?

The document we are now seeking views on is called the Draft Oldham Local Plan. It contains a vision for Oldham, a set of plan objectives and draft planning policies covering a wide range of topic areas including housing, open land, centres, our economy, climate change, design, transport and our communities.

The Draft Oldham Local Plan follows on from consultation that has already been carried out on the Regulation 18 Notification (in summer 2017) and the Issues and Options (in summer 2021). Details regarding comments received to the Issues and Options consultation and the council's responses can be found in the Issues and Options Comments and Response Schedule which is available to view on the council's website at https://www.oldham.gov.uk/info/201233/local_plan_review. Here you can also find the

Consultation Statement which sets out details of consultation that has been carried out to date.

Draft Oldham Local Plan Consultation

We welcome comments on any part of the Draft Oldham Local Plan and supporting documents.

The Draft Local Plan is supported by the following documents:

- Integrated Assessment (including the Habitat Regulations Assessment), Equalities Impact Assessment (as part of the Oldham Impact Assessment) and Health Impact Assessment); and
- Integrated Assessment Scoping Report Update 2.

A Non-Technical Summary of the Integrated Assessment is also available.

Topic papers and evidence are also available on the council's website, together with Frequently Asked Questions.

Where to view the Draft Oldham Local Plan

The Draft Local Plan and supporting documents can be viewed on the council's consultation portal at <https://bigoldhamconvo.oldham.gov.uk/> and on the council's website at <https://www.oldham.gov.uk/localplanreview>.

Hard copies of the Draft Oldham Local Plan and supporting documents can also be found at:

- the borough's libraries (for the latest details on library opening times please visit https://www.oldham.gov.uk/info/200395/find_a_library)
- the council's Access Oldham at Civic Centre, West Street, Oldham

Drop-in sessions are also being arranged which will provide a further opportunity for you to find out more about the Draft Oldham Local Plan and the review. Please visit for the council's website at <https://www.oldham.gov.uk/localplanreview> for up to date information regarding where and when the drop-in sessions are being held.

How to comment

Consultation on the Draft Oldham Local Plan and supporting documents is taking place from **10 January to 23:59 on 21 February 2024**, for a period of 6 weeks.

The council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online via the council's consultation platform at <https://bigoldhamconvo.oldham.gov.uk/>.

Alternatively, comments can be emailed to SPI.Consultations@oldham.gov.uk

Or addressed to:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

For those submitted by email or in writing a Comments Form is available online at <https://www.oldham.gov.uk/localplanreview>.

Comments on the Draft Oldham Local Plan, and / or its supporting documents, must be received by **23:59 on 21 February 2024**.

Further details regarding the Draft Oldham Local Plan consultation can be found on the Statement of Availability attached.

Please display the following documents until 23:59 on 21 February 2024 for members of the public to view:

- Statement of Availability
- Oldham Draft Local Plan
- Oldham Draft Local Plan Appendices
- Integrated Assessment (including the Habitats Regulations Assessment and Equalities Impact Assessment) and Appendices
- Integrated Assessment Non-Technical Summary
- Integrated Assessment Scoping Report Update
- Issues and Options - Comments and Response Schedule
- Consultation Statement
- Statement of Common Ground
- Poster and leaflets
- Comments forms

We have also prepared a series of Topic Papers on the following matters, which can be found on the council's website:

- Homes
- Economy and Employment (including Tourism)
- Our Centres (including Oldham Town Centre)
- Climate Change and Flood Risk
- Natural Environment
- Open Land
- Built Environment
- Transport
- Communities (including Local Environment)
- Infrastructure and Delivery
- Site Allocations Background Paper

How comments will be held

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. If you wish to be added to or removed from the mailing list please visit https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation or contact us via the details below.

Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the council's website at https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

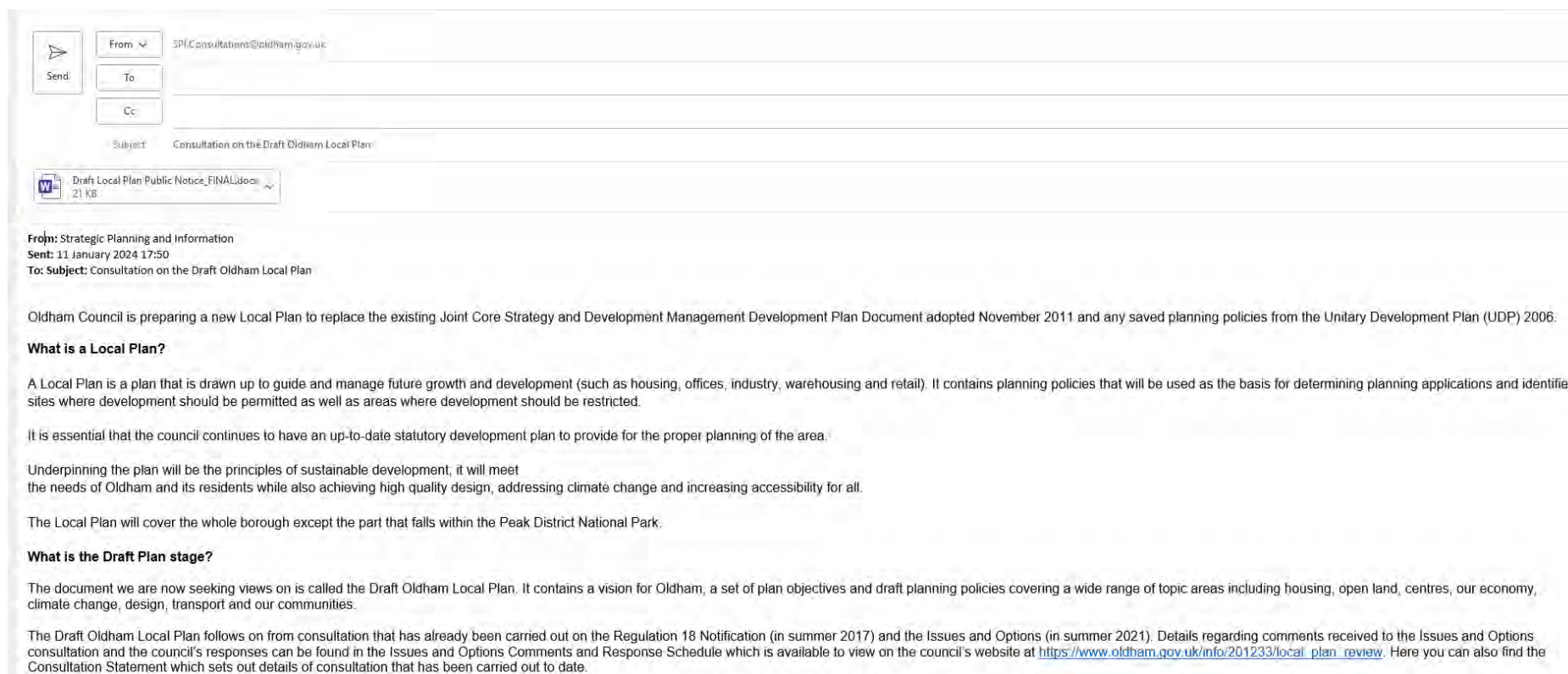
Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at SPI.Consultations@oldham.gov.uk.

Once again, thanks for your help in assisting us with getting people's views on planning issues.

Yours sincerely

Peter Richards,
Interim Head of Planning

Appendix 3f – Copy of email / letter text sent to all relevant Statutory Consultees, all Oldham Councillors and relevant parties on the Local Plan mailing list



Draft Oldham Local Plan Consultation

We welcome comments on any part of the Draft Oldham Local Plan and supporting documents.

The Draft Local Plan is supported by the following documents:

- Integrated Assessment (including the Habitat Regulations Assessment), Equalities Impact Assessment (as part of the Oldham Impact Assessment) and Health Impact Assessment); and
- Integrated Assessment Scoping Report Update 2.

A Non-Technical Summary of the Integrated Assessment is also available.

Topic papers and evidence are also available on the council's website, together with Frequently Asked Questions.

Where to view the Draft Oldham Local Plan

The Draft Local Plan and supporting documents can be viewed on the council's consultation portal at <https://bigoldhamconvo.oldham.gov.uk/> and on the council's website at <https://www.oldham.gov.uk/localplanreview>.

Hard copies of the Draft Oldham Local Plan and supporting documents can also be found at:

- the borough's libraries (for the latest details on library opening times please visit https://www.oldham.gov.uk/info/200395/find_a_library)
- the council's Access Oldham at Civic Centre, West Street, Oldham

Drop-in sessions are also being arranged which will provide a further opportunity for you to find out more about the Draft Oldham Local Plan and the review. Please visit for the council's website at <https://www.oldham.gov.uk/localplanreview> for up to date information regarding where and when the drop-in sessions are being held.

How to comment

Consultation on the Draft Oldham Local Plan and supporting documents is taking place from **10 January to 23:59 on 21 February 2024**, for a period of 6 weeks.

The council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted online via the council's consultation platform at <https://bigoldhamconvo.oldham.gov.uk/>.

Alternatively, comments can be emailed to SPI.Consultations@oldham.gov.uk

Or addressed to:

Strategic Planning and Information
Economy, Skills and Neighbourhoods
Room 310, Level 3, Civic Centre
West Street,
Oldham
OL1 1UH

For those submitted by email or in writing a Comments Form is available online at <https://www.oldham.gov.uk/localplanreview>.

Comments on the Draft Oldham Local Plan, and / or its supporting documents, must be received by **23:59 on 21 February 2024**

Further details regarding the Draft Oldham Local Plan consultation can be found on the Statement of Availability attached.

How your comments will be held

Please note all comments will be held by the council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. If you wish to be removed from the mailing list please visit https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation or contact us via the details below.

Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the council's website at https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at SPI.Consultations@oldham.gov.uk.

Yours sincerely



Peter Richards
Head of Planning

Appendix 3g – Copy of email sent to representative of the Oldham Partnership

Consultation on the Draft Oldham Local Plan



Joanne Blair

To

Cc



You replied to this message on 26/01/2024 12:30.



Oldham Leadership Board email.doc
.doc File



Draft Local Plan Public Notice_FINAL.docx
.docx File



Local Plan Consultation A5.pdf
.pdf File

Reply Reply All Forward

Thu 11/01/2024 18:56

Hi

Hope you are well ? Please can I ask you circulate the attached letter, public notice and leaflet via email to the Oldham Leadership Board members.

Many thanks

Jo

Joanne Blair
Local Plan and Urban Design Team
Oldham Council
Civic Centre
West Street
Oldham
OL1 1UH*

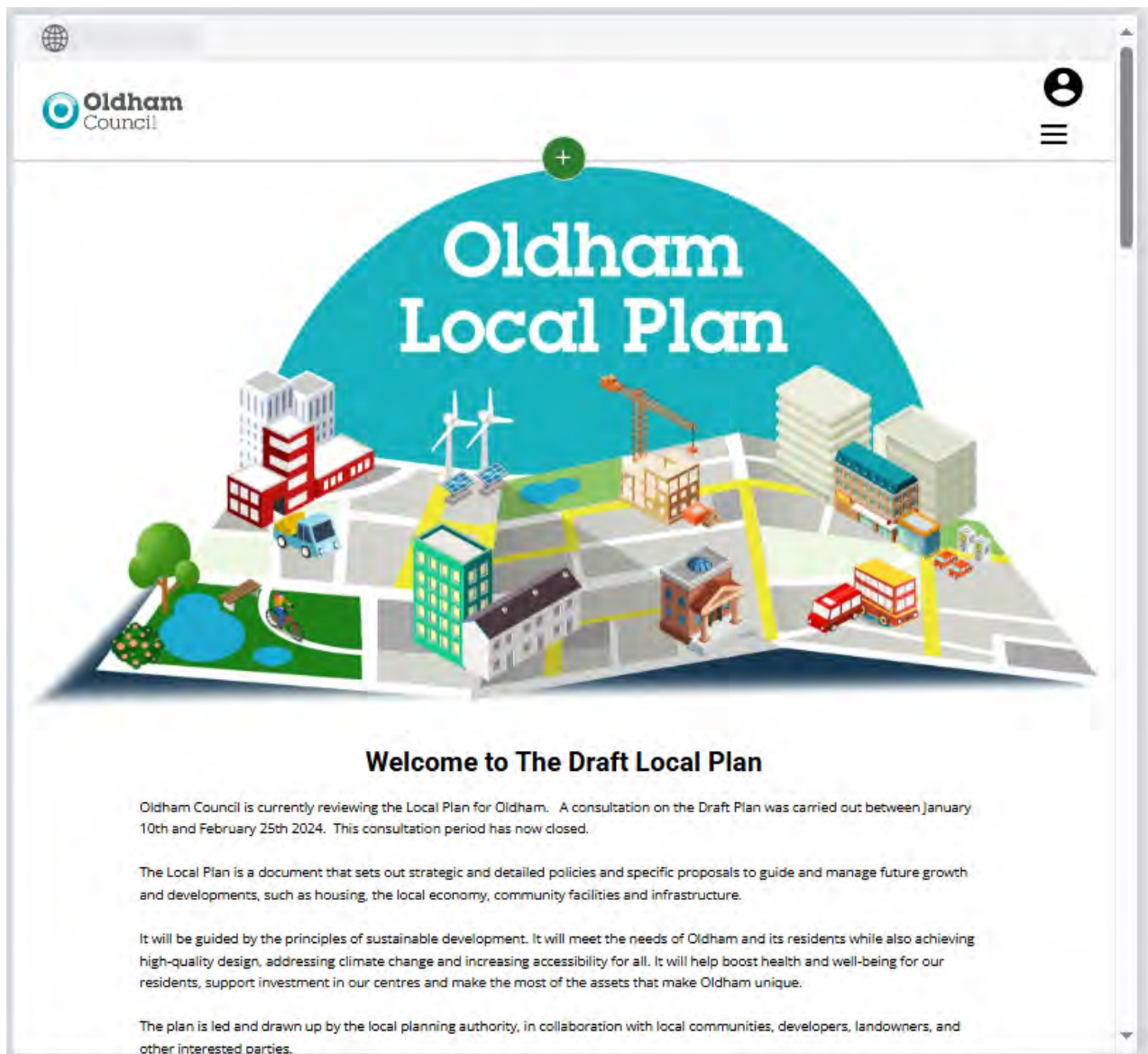
0161 770 4061

Joanne.blair@oldham.gov.uk

*Please note: for satellite navigation purposes the post code is OL1 1NL

Visiting the Civic Centre by Metrolink? The nearest stop is Oldham King Street

Appendix 3h – Screenshot of ‘The Big Oldham Convo’ Draft Local Plan Consultation webpage



Appendix 4 – Publication Local Plan Consultation

Appendix 4a – Copy of Publication Local Plan Public Notice

AMENDED 10 FEBRUARY 2026

OLDHAM LOCAL PLAN

STATEMENT OF REPRESENTATION PROCEDURE AND AVAILABILITY OF DOCUMENTS

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012 – REGULATION 19

Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 19:
Oldham Local Plan: Publication Plan Statement of Representations Procedure (incorporating
Availability of Documents).

Notice is hereby given that Oldham Council has published, and is inviting comments on, the
Oldham Local Plan: Publication Plan. Following approval at Council the Oldham Local Plan:
Publication Plan will then be submitted to the Secretary of State for independent
examination.

Subject matter and Geographical Area Covered

The Oldham Local Plan: Publication Plan covers the whole borough except that part which
falls within the Peak District National Park.

The Plan will guide development in the borough up to 2039. The main purposes of the Plan
are to:

- set out the non-strategic policies through which the Council will manage development coming forward and use to determine planning applications;
- identify designations, such as those for the protection of the borough's environmental and historical assets, our town centres, and employment areas; and
- facilitate the development of supporting infrastructure, such as transport, education and utilities.

Once adopted, the Oldham Local Plan will form part of the statutory Development Plan for the borough. It will be used to assess all planning applications across the borough, excluding that part which falls within the Peak District National Park, alongside the:

- Places for Everyone Joint Development Plan Document;
- Greater Manchester Joint Waste Development Plan Document;
- Greater Manchester Joint Minerals Development Plan Document; and
- any neighbourhood plans that may come into force during the lifetime of the Plan.

Period of Publication for Representations

Representations are invited between **Wednesday 4 February 2026 to 11.59pm on Friday 27 March 2026**. No representations will be considered after this time / date.

How to view documents

The Oldham Local Plan: Publication Plan and supporting documents, including the Integrated Assessment (incorporating the Habitats Regulations Assessment), can be viewed on the council's consultation portal at <https://bigoldhamconvo.oldham.gov.uk/> and on the council's website at https://www.oldham.gov.uk/info/201233/local_plan_review

Hard copies of the Oldham Local Plan: Publication Plan and Integrated Assessment (incorporating the Habitats Regulations Assessment) can be found at:

- the borough's libraries (for the latest details on library opening times please visit <https://hla.oldham.gov.uk/libraries/local-libraries/>); and the
- Oldham Council Customer Service Centre, Spindles Shopping Centre, Oldham, OL1 1HD

If you would like to discuss the Oldham Local Plan: Publication Plan or ask any questions before making your representation, you can book a telephone appointment with a planning officer, or in-person at the Council's Spindles Shopping Centre offices. To book an appointment please email spi.consultations@oldham.gov.uk or call 0161 770 4105.

Making representations

Representations are invited between **Wednesday 4 February 2026 to 11.59pm on Friday 27 March 2026**. No representations will be considered after this time / date.

Representations can be made by:

- **preferably completing the online response form at**
<https://bigoldhamconvo.oldham.gov.uk/>
- https://www.oldham.gov.uk/info/201233/local_plan_review
- alternatively, by downloading the response form available at and:
 - o emailing it to spi.consultations@oldham.gov.uk; or
 - o posting to: Strategic Planning and Information, Oldham Council, First Floor Reception, Spindles Shopping Centre, Oldham, OL1 1LA

Representations at this stage should only relate to the Oldham Local Plan: Publication Plan and its supporting documents which have been published alongside.

Comments received to previous stages of consultation on the Oldham Local Plan, have been summarised in the Statement of Consultation report, which will form part of the submission documentation.

Whilst representations may be made on any point in respect of the Oldham Local Plan: Publication Plan and its supporting documents, only those pertaining to the legal and procedural requirements, and four tests of soundness, will be considered by the Inspector at the Examination. Plans are sound if they are: positively prepared; justified; effective; and consistent with national policy (as per the National Planning Policy Framework, paragraph 36).

Please refer to the representation guidance notes when preparing representations.

What Happens Next

Following the end of the period for making representations, Oldham Council intend to submit the Oldham Local Plan: Publication Plan to the Secretary of State for Housing, Communities and Local Government, so that it can be assessed through an Examination in Public by an appointed Planning Inspector(s).

It will be the role of the Independent Planning Inspector(s) to examine whether the Plan meets the tests of soundness in the National Planning Policy Framework and all the relevant legislative requirements.

All representations received within the representation period will be submitted electronically to the Secretary of State for consideration by the Planning Inspector(s) as part of the Examination in Public. Comments, name and organisation will be published. Full details of how your information will be shared can be found in the Strategic Planning and Information Privacy Notice.

How to participate in the Examination

The representation form asks you to confirm whether you wish to participate in the Examination in Public and whether you wish to be notified of any of the following:

- Submission of the Oldham Local Plan: Publication Plan for independent examination.
- Publication of the Inspector's Report on the Examination of the Oldham Local Plan: Publication Plan.
- The Adoption of the Oldham Local Plan.

Have your say on Oldham's new Local Plan

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

Oldham Council is inviting residents, businesses and partners to have their say on the Publication version of the Oldham Local Plan.

This follows consultation on the Draft Local Plan in early 2024.

The Local Plan will guide how Oldham grows and develops up to 2039. It sets out where new homes, jobs and services should go, and how we protect the places that matter most.

The Plan will:

- be used to help decide planning applications
- protect important environmental and historic sites
- support our town centres and key employment areas
- help plan the infrastructure we need, including transport, schools and utilities

Councillor Elaine Taylor, Deputy Leader and Cabinet Member for Neighbourhoods, said: "After many years of work, this is the final stage of consultation before the Plan is submitted for independent examination.

"Planning shapes everyday life, from where we live and work to how we travel and spend our free time. This Plan is about more than land use. It also looks at health, education and community safety.

"We believe it provides a strong framework to support regeneration and help make Oldham a great place to live and work."

More information about the Oldham Local Plan: Publication Plan, and how to comment, is available on the council's website at https://www.oldham.gov.uk/info/201233/local_plan_review. Copies are also available in local libraries and the Oldham Council Customer Service Centre in Spindles Shopping Centre.

Comments are invited from Wednesday 4th February until Friday 27th March 2026. After the consultation closes, the Council intends to submit the Plan to the Secretary of State for Housing, Communities and Local Government. It will then be examined by an independent Planning Inspector, who will assess whether it meets all legal and policy requirements.

Memo

To	All Libraries	Date	10 February 2026
From	Peter Richards	Ext	4105
Subject	Oldham Local Plan: Publication Plan		

This memo outlines details of a planning consultation and asks if you could help publicise it.

We recently wrote to you about the consultation on the Oldham Local Plan: Publication Plan which commenced on the 4 February 2026.

I am now writing to let you know that the **consultation period has been extended to the 27 March 2026**. Details of the consultation and how to respond have been included again below for your information.

What is the Oldham Local Plan?

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 planning policies from the Unitary Development Plan (UDP) 2006.

Following consultation on the Draft Local Plan in 2024, Oldham Council has prepared the Oldham Local Plan: Publication Plan on which representations are now invited.

The Oldham Local Plan will guide development in the borough up to 2039. The main purposes of the Plan are to:

- set out the non-strategic policies through which the Council will manage development coming forward and use to determine planning applications;
- identify designations, such as those for the protection of the borough's environmental and historical assets, our town centres, and employment areas; and
- facilitate the development of supporting infrastructure, such as transport, education and utilities.

The Local Plan will cover the whole borough except the part that falls within the Peak District National Park.

Once adopted, the Oldham Local Plan will form part of the statutory Development Plan. It will be used to assess all planning applications across the borough, alongside Places for Everyone Joint Development Plan Document.

The Oldham Local Plan: Publication Plan is supported by a suite of documents, including:

- Integrated Assessment (including the Habitat Regulations Assessment, Equalities Impact Assessment and Health Impact Assessment);
- Integrated Assessment Scoping Report Update 3; and
- a non-technical summary of the Integrated Assessment.

Thematic topic papers providing information on how policies have been shaped and supporting evidence are also available on the council's website.

Statement of Representation Procedure

Details of the consultation and information on the procedure for submitting representations on the Oldham Local Plan: Publication Plan are set out within the attached Statement of Representation Procedure. This includes what information should be provided as part of a representation and details of the next stage - the independent examination of the Plan.

Where to view the Oldham Local Plan: Publication Plan

The Oldham Local Plan: Publication Plan and supporting documents can be viewed on the Council's consultation portal at <https://bigoldhamconvo.oldham.gov.uk/> and on the Council's website at https://www.oldham.gov.uk/info/201233/local_plan_review.

Hard copies of the Oldham Local Plan: Publication Plan and supporting documents can also be found at:

- the borough's libraries (for the latest details on library opening times please visit <https://hla.oldham.gov.uk/libraries/local-libraries/>); and the
- Oldham Council Customer Service Centre, Spindles Shopping Centre, Oldham, OL1 1HD

Appointments

Those who would like to discuss the Oldham Local Plan: Publication Plan or ask any questions before making their representation, can book a telephone appointment with a planning officer, or in-person at the Council's Spindles Shopping Centre offices. Appointments may be arranged by contacting spi.consultations@oldham.gov.uk or 0161 770 4105.

How to comment

Representations on the Oldham Local Plan: Publication Plan are invited between **Wednesday 4 February 2026 to 11.59pm Friday 27 March 2026**. This includes the extended consultation period.

The Council is keen to promote the submission of comments electronically and encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted using the online representation form via the Council's consultation platform at <https://bigoldhamconvo.oldham.gov.uk/>.

Alternatively, the representation form can be downloaded from https://www.oldham.gov.uk/info/201233/local_plan_review and may be:

- emailed to spi.consultations@oldham.gov.uk; or
- posted to: Strategic Planning and Information, Oldham Council, First Floor Reception, Spindles Shopping Centre, Oldham, OL1 1LA

Please display the following documents during the consultation period for members of the public to view:

- Oldham Local Plan: Publication Plan
- Oldham Local Plan: Publication Plan Appendices
- Integrated Assessment (including the Habitats Regulations Assessment and Equalities Impact Assessment) and Appendices
- Integrated Assessment Non-Technical Summary
- Integrated Assessment Scoping Report Update 3
- Statement of Representation Procedure

If you still have copies please also display alongside the above, the following documents relating to previous consultations carried out for earlier stages of the Local Plan. That is:

- The Local Plan Issues and Options (carried out in 2021); and
- The Draft Local Plan consultation (carried out in 2024).

If you no longer have copies of these documents those who wish to view them can do so at https://www.oldham.gov.uk/info/201233/local_plan_review.

How comments will be held

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Personal information of those submitting

representations, such as postal and e-mail address, will not be published, but name and organisation (if relevant) will.

Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the council's website at https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

Local Plan Mailing List

Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. If you a person would like to be removed from the mailing list please ask them to visit https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation or contact us via the details below.

Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at spi.consultations@oldham.gov.uk.

Once again, thanks for your help in assisting us with getting people's views on planning issues.

Yours sincerely

Peter Richards,

Assistant Director Planning, Housing and Transport

Appendix 4e – Copy of email / letter text sent to all relevant Statutory Consultees, all Oldham Councillors and relevant parties on the Local Plan mailing list

From: SPI Consultations <SPI.Consultations@oldham.gov.uk>
Sent: 10 February 2026 17:26
To: SPI Consultations
Subject: RE: Oldham Local Plan: Publication Plan - extension to consultation period
Attachments: Statement of Representation Procedure_Amended for extension consultation period_FINAL.pdf

Dear Recipient

We recently wrote to you about the consultation on the Oldham Local Plan: Publication Plan which commenced on the 4 February 2026.

I am now writing to let you know that the **consultation period has been extended to the 27 March 2026**. Details of the consultation and how to respond have been included again below for your information.

What is the Oldham Local Plan?

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 planning policies from the Unitary Development Plan (UDP) 2006.

Following consultation on the Draft Local Plan in 2024, Oldham Council has prepared the Oldham Local Plan: Publication Plan on which representations are now invited.

The Oldham Local Plan will guide development in the Borough up to 2039. The main purposes of the Plan are to:

- set out the non-strategic policies through which the Council will manage development coming forward and use to determine planning applications;
- identify designations, such as those for the protection of the Borough's environmental and historical assets, our town centres, and employment areas; and
- facilitate the development of supporting infrastructure, such as transport, education and utilities.

The Local Plan will cover the whole Borough except the part that falls within the Peak District National Park.

Once adopted, the Oldham Local Plan will form part of the statutory Development Plan. It will be used to assess all planning applications across the Borough, alongside Places for Everyone Joint Development Plan Document.

The Oldham Local Plan: Publication Plan is supported by a suite of documents, including:

- Integrated Assessment (including the Habitat Regulations Assessment, Equalities Impact Assessment and Health Impact Assessment);

- Integrated Assessment Scoping Report Update 3; and
- a non-technical summary of the Integrated Assessment.

Thematic topic papers providing information on how policies have been shaped and supporting evidence are also available on the council's website.

Statement of Representation Procedure

Details of the consultation and information on the procedure for submitting representations on the Oldham Local Plan: Publication Plan are set out within the attached Statement of Representation Procedure. This includes what information should be provided as part of a representation and details of the next stage - the independent examination of the Plan.

Where to view the Oldham Local Plan: Publication Plan

The Oldham Local Plan: Publication Plan and supporting documents can be viewed on the Council's consultation portal at <https://bigoldhamconvo.oldham.gov.uk/> and on the Council's website at https://www.oldham.gov.uk/info/201233/local_plan_review.

Hard copies of the Oldham Local Plan: Publication Plan and supporting documents can also be found at:

- the Borough's libraries (for the latest details on library opening times please visit <https://hla.oldham.gov.uk/libraries/local-libraries/>); and the
- Oldham Council Customer Service Centre, Spindles Shopping Centre, Oldham, OL1 1HD

Appointments

If you would like to discuss Oldham Local Plan: Publication Plan or ask any questions before making your representation, you can book a telephone appointment with a planning officer, or in-person at the Council's Spindles Shopping Centre offices. To book an appointment please email spi.consultations@oldham.gov.uk or call 0161 770 4105.

How to comment

Representations on the Oldham Local Plan: Publication Plan are invited between **Wednesday 4 February 2026 to 11.59pm Friday 27 March 2026**. This includes the extended consultation period.

The Council is keen to promote the submission of comments electronically and encourage anyone with appropriate facilities to make their responses in this way. Comments can be submitted using the online representation form via the Council's consultation platform at <https://bigoldhamconvo.oldham.gov.uk/>.

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- emailed to spi.consultations@oldham.gov.uk; or

- posted to: Strategic Planning and Information, Oldham Council, First Floor Reception, Spindles Shopping Centre, Oldham, OL1 1LA

How your comments will be held

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address, will not be published, but your name and organisation (if relevant) will.

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Local Plan Mailing List

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Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at spi_consultations@oldham.gov.uk.

Yours sincerely



Peter Richards

Assistant Director of Planning, Housing and Transport

Appendix 4f – Copy of letter sent to the Oldham Partnership

Date: As postmark
Our ref: Oldham Local Plan: Publication Plan



Place Directorate
Strategic Planning and Information, First
Floor Reception, Spindles Shopping Centre,
Oldham, OL1 1LA
Tel: 0161 770 4105
Email: spi@oldham.gov.uk

Dear Oldham Leadership Board,

Re: Oldham Local Plan: Publication Plan – extension to consultation period

Note: Please feel free to pass on details of this consultation to your partners and customers.

We recently wrote to you about the consultation on the Oldham Local Plan: Publication Plan which commenced on the 4 February 2026.

I am now writing to let you know that the **consultation period has been extended to the 27 March 2026**. Details of the consultation and how to respond have been included again below for your information.

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working for a co-operative borough

www.oldham.gov.uk

London: 020 7700 0000 | Manchester: 0161 275 2000 | Oldham: 0161 770 4105

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Should you wish to discuss any issues or require any further information please do not hesitate to contact the Strategic Planning and Information Team on 0161 770 4105 or by email at spi.consultations@oldham.gov.uk.

Once again, thanks for your help in assisting us with getting people's views on planning issues.

Yours sincerely



Peter Richards,
Assistant Director Planning, Housing and Transport

Appendix 4g – Screenshot of ‘The Big Oldham Convo’ Publication Local Plan Consultation webpage

Oldham Council

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Oldham Council

Oldham Local Plan

Welcome to the Oldham Local Plan: Publication Plan

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

The Council is currently reviewing the Oldham Local Plan and we are now at the Publication Plan stage.

The Oldham Local Plan

Oldham's Local Plan will guide development in the Borough up to 2039. It sets out the policies through which the Council will manage development coming forward and use to assess planning applications.

The Plan has been prepared to support the implementation of the [Places for Everyone](#) Joint Plan in Oldham. Places for Everyone provides the strategic planning policy framework for the Borough. The Oldham Local Plan will provide the non-strategic 'local' policies.

It covers the whole borough except that part which falls within the Peak District National Park (PDNP). Where development proposals lie within that part of Oldham which falls within the PDNP applicants must consider the Peak District National Parks' relevant planning policies.

Publication Plan stage

The [Oldham Local Plan: Publication Plan](#) follows on from the [Draft Local Plan](#) consultation that was carried out in early 2024. A summary of the comments received to the Draft Plan can be seen in the [Schedule of Responses](#) and details of previous stages of consultation can be found on the Council's [Local Plan Review](#) webpage.

The Publication Plan contains a vision for Oldham, a set of plan objectives and non-strategic planning policies covering a wide range of topic areas including housing, open land, centres, our economy, climate change, design, transportation and our communities.

Planning affects many aspects of our lives and our environment – from where we live, work, shop and how we spend our leisure time. In producing this Local Plan, we are not just considering land uses, but we are also considering other issues that can be affected by land use, including health, education and community safety.

The Publication Plan is the final stage of consultation before the Plan is submitted for independent examination. It can be viewed here:

- [Publication Plan](#)