

Oldham

Local Plan

**Oldham Local Plan: Publication Plan -
Regulation 19(1) Representations - Part 01 -
A1 to C1**

August 2026



Oldham
Council

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From: Sam Al-Hamdani [REDACTED]
Sent: 26 March 2026 19:24
To: SPI Consultations
Cc: Elizabeth Dryden-Stuart; Georgina Brownridge; Karen Allott; Barbara Beeley; Andrew Fletcher
Subject: Saddleworth Parish Council response to Oldham's Local Plan
Attachments: SPC - Representation_Form_Amended_for_extended_consultation_period_FINAL copy.rtf; SPC - Response to the Oldham Local Plan.pdf



Good evening,

Please find attached Saddleworth Parish Council's representation on Oldham's Local Plan. I have completed the representation form to provide my details, but it was not straightforward to put our submission into the template, so have supplied that as a separate document. I have included the same details in the submission also.

Many thanks,

Sam Al-Hamdani
Saddleworth Parish Council

www.oldhamlibdems.org.uk

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	Oldham Local Plan Publication Plan Stage Representati on Form	Ref: (For official use only)
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Comments are invited until 11.59pm on Friday 27 March 2026

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

Please return this form by:

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

Alternatively, please complete the online response form via the Council's consultation platform at <https://bigoldhamconvo.oldham.gov.uk/>

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 and names will be published. Full details of how your information will be shared can be found in the Strategic Planning and Information Privacy Notice which can be found on the council's website at

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

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr		
First Name	Sam		
Last Name	Al-Hamdani		
Job Title (where relevant)	Councillor		
Organisation (where relevant)	Saddleworth Parish Council		
Address Line 1	Civic Hall		
Line 2	Lee Street		
Line 3	Uppermill		
Line 4	Saddleworth		
Post Code	OL3 6AE		
Telephone Number			
E-mail Address (where relevant)			

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	See attached document.	Policy		Policies Map	
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4. Do you consider the Local Plan is:

1. Legally compliant
No

Yes

2. Sound
No

Yes

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached document

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached document

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐	No , I do not wish to participate in hearing session(s)	☐	Yes , I wish to participate in hearing session(s)
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Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We would be happy to participate in the hearing should it be required to provide any clarity or detail with regard to our submission.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Finally, please tick 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.

Response to the Oldham Local Plan

With regards to part A, of the guidance note for submitting comments, please find attached Saddleworth Parish Council's submission on Oldham's Local Plan, as submitted by Councillor Sam Al-Hamdani, on behalf of the Council's Strategic Planning Committee. The Strategic Planning committee can be reached by contacting the clerk of the Council, on [REDACTED], emailing [REDACTED] or by writing to Saddleworth Parish Council, Civic Hall, Lee Street, Uppermill, Saddleworth OL3 6AE

With regards to Part B, we have highlighted throughout exactly which chapter, paragraph, objective or policy we are talking to, either by underlining in text, or by starting the paragraph with a clear heading. Commentary is in plain text, requests for changes have been put in bold.

Should it be required to support our statements, we would be happy to participate in a public hearing.

We wish to be notified of the submission of the Oldham Local Plan: Publication Plan for independent examination, and the Publication of the Inspector's Report on the Examination of the Oldham Local Plan: Publication Plan.

Overall, Saddleworth Parish Council would like to commend the positive intent of the Oldham Local Plan and, in particular, its positive stance on improving the environment of the borough, working towards employment opportunities, and improving public transport connections throughout.

We would like to address some general and some specific points with regards to the Local Plan.

Overall

Documents referred to in the text are highlighted in blue and underlined. However, they are not the actual links, which are contained in the footnotes. **We suggest that a different visual identifier is used for the links in the text, such as italics, so that readers do not have the expectation that these are a hyperlink.**

Throughout the plan, references are made to "Oldham". In many cases, it is unclear as to whether the plan is referring to the borough or to the town. **As such, we would like to request that every instance should be explicit in referring to one or the other.**

Each page of the Local Plan has the strapline "The Local Plan must be read as whole and together with Places for Everyone". We would emphasise that it is not simply a case of reading the Plan with Places for Everyone, and request that this is changed to **"The Local Plan must be read as a whole and in conjunction with other relevant planning**

documents including the NPPF, Places for Everyone, and relevant Neighbourhood Plans.”

We also have concerns about the way that the Local Plan often treats the borough as a more singular area than is the case. This is a borough of great diversity and of great contrasts. **Great care is needed to ensure that universal statements are not made that would not apply to the whole borough, and we believe that there are a number of examples where this needs to be addressed**, for example our comments on chapter 5, chapter 6, policy H2, etc.

There are many occasions where acronyms and abbreviations are used without definition, for example, GVA, BREEAM and CAVAT. **Each should be defined in the first instance, and then used consistently. It would also be helpful for them to be added consistently to the glossary at the back of the document.**

The document has an extensive focus on Oldham Town Centre, which is one of several town centres in the borough. There is, for example, a full chapter exclusively on Oldham Town Centre. There is very little content on rural centres, with Saddleworth largely referenced in terms of Uppermill, and “Local Shopping Parades” – see comments on policies C1 and C3. **We would like to see a much more balanced approach to this document, reflecting the borough as a whole.**

There is an accompanying policies map to the plan. However, the policies map is not consistently coordinated with the policies contained within the plan as a whole. There is also an issue where different areas on the map overlap with each other, which in many cases makes it impossible to use on a practical level. **We would suggest there should be individual policy maps for each item (or in some cases related groups of items) in the key, and a clear indication of which policies are relevant to that map.**

Many of the appendix maps lack the detail to make them usable. For example, appendix 9, Local Green Spaces, only contains a reference number to the Local Green Space, but not its name or location, meaning the appendix can only be understood by the reader in conjunction with table OL1 of the Local Plan, which is not referenced in the appendix. The maps themselves lack any detail to be identified, with localities and street names either non-existent or unreadable. Appendix 8 is an example of where the maps are clear, include road names, and the titles give a clear indication of location. We do not believe that many of these appendices would be simple for residents, planners or developers to use. **We recommend that:**

- **Appendices 2 and 9 be amended to have clearer identifying information in each map (i.e. locations and road names being included and legible), and the titles for each map to include a specific location name, not just a number reference.**
- **Appendices 3, 4, 6 and 11 be amended to have clearer identifying information in each map (i.e. locations and road names being included and legible).**
- **Appendices 5 and 7 be amended to have clearer identifying information in each map (i.e. locations and road names being included and legible), and to**

have large scale versions of the specific locations, not just their general location.

- **Appendix 10** should include maps of the SBIs, or if this cannot be done, a reference to where the maps can be found. It should also include a definition of what the gradings included in the document mean.

Chapter 3

We would specifically like to **support the environmental targets** in paragraphs 3.9–3.13 of the Local Plan. Saddleworth's Neighbourhood Plan puts great emphasis on environmental targets, with both a specific chapter on the environment, and it as a cross-cutting theme throughout. We look forward to seeing more information on how the Council will achieve the net zero targets laid out, in particular the 2025 target for the Council itself.

We would similarly like to **support the health and well-being priorities** in 3.14–3.15. The importance of this was made clear in the public consultation for the Saddleworth Neighbourhood Plan, and as a result, the Neighbourhood Plan was amended to include a specific chapter on Health, Social Care and Education. We are heartened to see this listed as a priority in the Local Plan.

Chapter 5

We have distinct concerns about the way that the Spatial Portrait fails to make clear that the extremely important and welcome diversity of the borough is reflected in different ways in specific areas. Oldham is a borough of contrasts, and we believe any Local Plan must more accurately reflect that. Many of these differences are where this is most stark, but we believe that **ensuring an accurate emphasis on these differing presentations would benefit the borough as a whole and ensure the local plan is well tailored to the differing needs of all areas.**

Paragraph 5.2 reflects the ethnic diversity of the population of the borough as a whole, but not the clear distinctions between some of the districts with a much higher than average ethnic minority population, and others with a much lower. **We believe that a more accurate portrait would give a clear understanding of how this diversity manifests differently in different areas**, which is important to recognise so that we can consider future development which will remove barriers between those groups, to allow them to live alongside each other coherently and complement each other.

Paragraph 5.3 talks about the borough's young population, and again, while this is reflective of the overall average, this does not reflect all areas as accurately. We believe that **it would be clearer to show that some areas, such as Saddleworth, have a significantly higher average age than the borough as a whole.**

In paragraph 5.4, the portrait fails to reflect the very wide difference in health outcomes and requirements across the borough. This would reflect in a much higher proportion of issues in Saddleworth that, for example, relate to elderly care and elderly isolation, and **the Local Plan should reflect on similar differences across the borough.**

Paragraph 5.5 talks about the typical housing in the borough, but again, it should be reflected that the housing makeup in Saddleworth is very different to that of the borough as a whole. Particularly in the villages closer to the Peak District National Park, there is a considerably lower proportion of housing that reflects the terraced housing that is referenced in the report. Further the terraced housing that does exist is much more typical of Pennine villages than the mill towns that the centre of the borough epitomised. This is reflected in policy 10 of the Saddleworth Neighbourhood Plan, on design, character and heritage. We feel that **a more nuanced description of the contrasts in housing stock would more clearly reflect the borough, and ensure that the Neighbourhood Plan and the Local Plan were more visibly in conformity.**

Paragraphs 5.6 and 5.8 on Economy and Employment again, we feel, fail to reflect the substantial contrasts across the borough. Using Saddleworth as the example, which has a significantly smaller industrial base, although one which is vital, much of the employment comes from working from home, tourism and hospitality, and commuting. We feel that **the portrait should again be reworded to more accurately reflect the contrasts in different areas**, and provide a more nuanced and reflective description. Paragraph 5.10 on tourism brings this into focus, with a clear assessment of the role tourism plays specifically on the Saddleworth economy, and we feel that a clearer analysis in paragraphs 5.6 and 5.8 would therefore offer more consistency with paragraph 5.10 of the Local Plan.

In paragraph 5.10 there also seem to be some very clear omissions in the list of successful events that are held in the borough, **a list that would not seem to be complete without, at the very least, Saddleworth's Whit Friday Band Contest.**

We welcome the extent to which paragraphs 5.12–5.21 reflect the diversity of the natural environment in the borough, in particular the complementary differences between the green spaces of the Peak District National Park, and the Northern Roots project. **We would ask whether there is sufficient reflection on the provision of natural environment in the more urban areas of the town, and access to those areas listed?**

We welcome the emphasis placed on the Historic Environment, as discussed in paragraphs 5.22–5.26 of the Local Plan. We do, however, feel that there should be a clearer emphasis placed on the Conservation Areas across the borough. There are 22 defined conservation areas across Saddleworth, but currently only two have had conservation area assessments, both of which are significantly out of date. We feel that there is a strong emphasis in this section on the conservation of Oldham Town Centre, and a lack of balance when reflecting on the historic environment and conservation areas across the borough. **We would argue strongly for the inclusion of new sections which discuss these conservation areas, and set out ambitions to ensure their protection and enhancement.**

Paragraphs 5.27–5.29 on Transport again would reflect our comments on universal statements that do not accurately reflect the situation for all districts. Saddleworth has one train station, no access to the Metrolink, and a heavy reliance on cars for access. Further Greenfield train station does not offer any direct connection to the rest of the

borough, which means a very heavy reliance on the two main arterial roads which serve the area. Should, for example, one of these arterial roads and the train station be closed for a period of months, it would have a potentially catastrophic impact on traffic and local businesses, which is something that would not be clear to a developer if they were to read this section of the Local Plan as it stands.

We feel that there could be additional paragraphs added to the section on energy to reflect the success of Saddleworth Hydro as a community endeavour, and to discuss the issues of isolated residences in Saddleworth which currently rely on diesel as a main source of heating.

Chapter 6 Vision for Building a Better Oldham

Overall, we would like to commend the authors of the Local Plan for their vision of Oldham and its development over the next 13 years.

In [paragraph 6.3](#), we would like to draw more emphasis to Saddleworth's very different requirements to Oldham as a whole in terms of housing needs, and accessibility.

As reflected in our comments on paragraphs 5.27 to 5.29, while we embrace this positive statement of intent in [paragraph 6.5](#), we would question how well it reflects reality for Saddleworth, and ask **whether there needs to be a clearer ambition for dealing with the limited public transport that is a particular issue for the area.**

In [paragraph 6.6](#), we welcome the inclusion of Uppermill and Lees in the list of borough centres. In particular, given the distinctly different geography of the areas, **Uppermill plays the role of the town centre for Saddleworth, and this should be reflected in the way in which it is addressed throughout planning.** However, we also feel that there should be an additional recognition of the importance of the village centres throughout Saddleworth, given their relatively isolated nature. **Failing to include reference to this undermines the importance of these villages** in ensuring that local services are within easy reach of residents, minimising the need for unnecessary additional travel, and reducing isolation.

We particularly welcome the health ambition stated in paragraph 6.7, given the importance Saddleworth residents during the consultation on the Neighbourhood Plan. It also reflects on the Parish Council's stated ambitions to support the development of a new health centre for Saddleworth. We would again reflect on the need for a reference to the different requirements to deliver this given the very different demography and geography of Saddleworth.

We also strongly commend the ambitions in [paragraph 6.9](#) on environmental and heritage targets. In particular, policies 1–7 of the Neighbourhood Plan on the environment are in strong conformity with these ambitions with regards to the environment, as are policies 9–12 with regards to design and the historic environment.

Chapter 7 Plan objectives

We are broadly supportive of the plan objectives, although we feel that these could be strengthened in places as set out below. Throughout, we note the strong conformity of the Saddleworth Neighbourhood Plan with these objectives.

There is no reference in PO1 to social housing, which is later an extensive part of the diverse mix of housing which is included in policy H5. We feel that this is an important objective, particularly considering the lack of affordable housing referenced in paragraph 8.51 of the reasoned justification, and **including a reference to social housing here would draw a much stronger connection between the objective, the policy and the reasoned justification.**

We particularly welcome the references to the importance of leisure and tourism in PO3, which are particularly relevant in for Saddleworth. We note the vital importance of protecting the industrial base, and employment areas in the Parish. However, elsewhere in this objective, we feel **there could be mention made of likely opportunities for growth that are particularly relevant in Saddleworth, but also elsewhere: home-working, services and tourism, as well as to where people who are commuting outside the area.** This would also make clearer the conformity between this plan and in particular, policies 19–25 of the Saddleworth Neighbourhood Plan.

We particularly welcome the objective on Local Green Spaces in PO5, which is well aligned to the approach taken in the Saddleworth Neighbourhood Plan (policy 4), and the accompanying submission to this document from Saddleworth Parish Council on additional Local Green Spaces.

In PO7, we particularly commend the references to the importance of the peat habitat, as referenced in the GM Green and Blue Infrastructure Strategy and referenced in paragraph 18 of the reasoned justification of the Saddleworth Neighbourhood plan. **We feel that there could be more emphasis placed on solving existing problems, as is done in bullet points 3 and 4, throughout this objective.**

We commend PO8, with reference to our previous comments on paragraph 6.7 above. The extensive consultation carried out for the Saddleworth Neighbourhood Plan showed a particular concern from residents over the importance of health, education and social care, which we feel is reflected in this objective, and which policies 13 and 14 of the Saddleworth Neighbourhood Plan are in strong conformity with.

We note the strong conformity of the Saddleworth Neighbourhood Plan with PO9, in particular policies 10, 11 and 12 of the Neighbourhood Plan. However, we note that this objective focuses solely on the Oldham Town Centre Conservation Area Management Plan, and contains no objectives with regards to the other 21 Conservation Areas across the rest of the borough. Of the Conservation Areas in Saddleworth, only two have had assessments carried out, and both are well out of date. **We feel that the objective should include extra bullet points with a clear target of carrying out assessments on conservation areas across the borough, and ensuring that they are given due**

consideration and protection, which would then provide consistency between the Objective and Policy HE1.

With PO10, we would refer you to our comments on paragraph 6.5 with regards to sustainable transport options in Saddleworth.

In the map on page 27, the key shows that the future developments are an indication of the level of ward-by-ward distribution of future housing, but by placing a specific marker in a location on the map, this could give a misleading impression that a specific development will be brought forward in the locations where the markers have been placed – in Saddleworth, this would be in Springhead, in Greenfield and in Delph. **We feel that instead an accompanying table showing >1000 homes, 500–999 homes and <500 homes and a list of which wards fell into each category would be a less ambiguous way of reflecting this information.**

Chapter 8 Homes

We are broadly supportive of many of the policies contained within Chapter 8, although we feel that the policies could be strengthened, clarified and enhanced by carrying out the following changes:

We consider that the text in paragraph 8.3 is a good example of our earlier comments on the Local Plan failing to adequately reflect the different needs of different areas. We would suggest that revising the text as below (or with similar intent) would improve this.

The Local Housing Needs Assessment (LHNA) (2024)²⁴ 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, as well as distinctly different housing markets in specific areas. There are increasing numbers of people at risk of, or currently experiencing, homelessness in the borough. There 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 specific issues which affect some of Oldham's neighbourhoods, which include overcrowding, an increased need for larger inter-generational family housing, an increasing ageing population, and a need for housing suitable for disabled people.

Policy H1

We feel that the title of this policy does not accurately reflect the policy set out. The diverse housing mix is addressed in policy H3, and policy H1 only refers to sustainability in terms of sustainable and accessible locations. **We would recommend that the policy be renamed: Housing delivery. We also note that the last paragraph of policy H1 might be considered more relevant to policy H2.**

Policy H2

We note that the policy makes no distinction between urban and rural centres, and there is no reference to village centres outside of Uppermill. As such, we would ask if full consideration has been given to housing density in other rural centres. **It could be the case that there should be a further category in the table of rural centres, with specific density targets.**

We would strongly contest the use of the term “frequent” in relation to train services to Greenfield train station. Depending on the time and day of the week, services are limited to only one or two an hour, which is well short of the frequency needed for this to be regarded as a “turn up and go” service, and there is no realistic proposition of it ever achieving the level of service (approximately once every 10 minutes) that would allow it to be defined as such.

Policy H3

In line with our comments on policy H1, **we suggest that the title of policy 3 would more appropriately be “A diverse housing mix”.**

In terms of consistent presentation of information, 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, as it contains exceptions to that table, **we suggest that table H2 is moved to be included within the policy.**

We strongly support the inclusion of self-build and custom housebuilding, and note the strong conformity of policy 18 of the Saddleworth Neighbourhood Plan with this part of policy H3.

We note the reference in [paragraph 8.18](#) to the breakdown of housing in different districts as laid out in the Local Housing Needs Analysis, 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, **we feel that 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.

Policy H4

We are broadly supportive of this policy, but observe that the policy does not just refer to local but also to specific types of needs, **which could be reflected in the title of the policy.**

Policy H5

We are broadly supportive of the policy, and strongly support the increased targets for delivery of social housing.

We note the extreme variation in the requirements for affordable housing between the Local Housing Needs Analyses carried out in 2019 and 2024, increasing from 204

affordable homes a year to 669 affordable homes per year (98.3% of the housing requirement for Oldham). We would question if there is an explanation for this massive variation? Given this substantial increase in the requirement for affordable homes in a five year period, **we would ask if the targets for affordable and social housing are sufficient for this to be addressed, particularly given the length of time covered by the Local Plan.**

Policy H6

We note that there is a reference to the different housing markets for HMOs, for example between student accommodation, and low-cost provision for individuals or couples in need of low cost accommodation, but no analysis of how this breaks down in Oldham. **As such we would ask whether this needs to be included, and whether the policy would then need to be amended to reflect the development of HMOs to serve specific markets.**

We also note that there are multiple definitions of HMOs, and that while the definition being used is given in the reasoned justification, **we think the definition should be included in the policy itself.**

As a small note, licence is spelled incorrectly (as a verb, not a noun).

Chapter 9 Economy and Employment

We are broadly supportive of the policies to enhance the economy and employment throughout this chapter, but we are concerned at the lack of references in this section to farmland and agriculture, which is a major part of the economy of Saddleworth, and in certain other parts of the borough. We feel that **there should either be a specific policy on farming and agriculture or that one of the existing policies should be amended to include extensive reference to farming and agriculture.** There is also no reference to home working (other than separately in Policy IN 1) and, as such, we feel that **one of the policies in this chapter should be amended to reference home working.**

We also feel that the policies could be strengthened, clarified and enhanced by carrying out the following changes:

Policy E1

We note that the policy says that there “will be” the delivery of a specific amount of floorspace. **We 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.

Policy E2

We are strongly supportive of this policy, and particularly note the importance of retaining business and employment areas being kept in a high property value area.

With reference to the uses permitted in the business and employment areas (BEAs), **we would ask if all of those permitted uses are supported in all cases, or whether there should be a reference made to the neighbourhood context of the BEA. We would also question whether health facilities such as such as gyms would qualify under the uses laid out, and if full consideration has been given to whether they should be.**

Policy E4

A small note on paragraph 9.28 to say that should be a significant **number** of clusters, not amount.

Chapter 10 Our Centres

While supportive of many of the elements in this chapter, we feel that there is a failure to address rural centres and the requirements of people living in rural environments, and that this needs to be addressed better throughout the document.

Policy C1

In this policy, we feel that many of the villages across Saddleworth have centres offering services which would not fit easily within the term “Local Shopping Parades” which is also not clearly defined within the document. **We would ask if a better term might be “Local Service Clusters” or similar, and ask for more in the reasoned justification to define these, perhaps around density of services facilities in a given area.**

We also note that there are villages which have already lost what shops they once had, for example Denshaw, but where people still require local services, and these locations are not captured in this policy. We would suggest that **there should be a reference in the policy to places where there is sufficient housing density to justify the provision of services, but they are not currently present.**

Policy C2

We would again echo the concerns about the use of the term Local Shopping Parades, and feel that by changing this reference, the policy would better reflect the needs of and approaches to rural centres.

Policy C3

We note that in points 6a, b, c, d and f there is no clear definition of any measurements by which these points would be assessed and that in planning terms this could render them ineffective. **We would suggest that there should be a clear indication in the 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.**

Policy C4

We reiterate our earlier comments with reference to Local Shopping Parades with regards to how this policy is applied in rural centres, but are strongly supportive of the

principle, and note the strong conformity of policy 23 of the Saddleworth Neighbourhood Plan with this policy.

However, we 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. **We would suggest that these paragraphs be revised to add significant details to the monitoring criteria, and how they will be applied in different contexts.**

Chapter 11 Oldham Town Centre

As all of Oldham Town Centre falls outside the boundaries of Saddleworth Parish, we have not put forward any comments on this section of the Local Plan.

Chapter 12 Addressing Climate Change

We would offer our strong support for the approaches taken in this chapter, and note the strong conformity of the Saddleworth Neighbourhood Plan with this, which has had climate change and environment embedded throughout the document as a cross-cutting theme, as well as being covered in the section on Environment. We would only suggest some very minor additions or corrections to some of the policies.

Policy CC1

We would note that in the Saddleworth Neighbourhood Plan, under policy 5, character and quality of land adjacent to the National Park, and a defined area which is being considered in this policy, which is complementary to parts of this policy, and would suggest that this would be well reflected by adding a footnote reflecting this to point 13.

There is a typo in the name “South Pennines” on page 86.

Policy CC2

We note that there is a lack of quality information on many locations of culverts, drains and sewers, etc, particularly in Saddleworth, and that **this lack of information could be reflected in this policy or the reasoned justification.**

We note that this section is a clear example of the concerns we raised of potential difficulties for people using the Local Plan and the Policy Map.

Policy CC3

There is a typo – “Non-portable” should be “non-potable”, and the box outlining the policy seems to have slipped.

We would also particularly like to note the high level of conformity of policy 8 of the Saddleworth Neighbourhood Plan with this policy.

Chapter 13 Natural Environment and Open Land

We are in strong support of the policies (or intended policies) contained within this chapter. However, we think that the wording of policy OL1 currently creates a very different policy to the one that is intended. We feel that the policies could be strengthened, clarified and enhanced by carrying out the following changes:

Policy OL1

The policy as it currently reads “*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 seems to suggest that any development in any part of the borough has to meet the purposes of the Peak District National Park. **We suggest that the wording of this policy be revised to be consistent with the language used in paragraph 13.5 to read:**

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.

We would also suggest that a reference to policy 5 of the Saddleworth Neighbourhood Plan, on character and quality of land adjacent to the National Park, and the accompanying map would be a very helpful reference to include.

We would also recommend a revision of paragraph 13.1 to read The Peak District National Park is a protected landscape part of which falls within the borough of Oldham.

Policy OL2

We would recommend a specific reference to the Saddleworth Neighbourhood Plan policy 6 – Conversion of agricultural buildings (barn conversions) would be a helpful addition to the Local Plan.

We are concerned that the Local Plan says that there is no set definition for “infilling” and sets out some criteria for this, but without putting forward any strong definitions that could be used to assess them when considering a planning application. **We would suggest that the policy should be revised to better define its terms, for example what is considered a “small gap”.**

Policy OL3

There is no definition of what is meant by “sympathetic” which leaves an lot of leeway in the way that it is interpreted. Similar to our comments and approach on policy OL2, **we would ask if the term should be removed or better defined.**

We 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. **We consider that the wording of the policy could be amended to better reflect this,**

where the individual or cumulative total volume exceeds more than 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.

Policy OL4

As it reads, there is no reference to there being other Local Green Spaces defined in planning documents other than this Local Plan, such as the ones set out in the Saddleworth Neighbourhood Plan, under policy 4. We consider that **there must be a reference to the additional Local Green Spaces in the Saddleworth Neighbourhood Plan, as well as to any other Neighbourhood Plans which come forward.**

We also have included a report from the Saddleworth Parish Council on a number of additional sites which we suggest should be included in the Local Plan as Local Green Spaces.

Policy OL5

We note that this policy addresses a particular issue that we have encountered in Saddleworth around light spillage, and we are therefore strongly supportive of this policy. **We suggest that the wording might be slightly clearer if revised to read “proposed lighting does not exceed the minimum required for ...”.**

Chapter 14 Addressing the biodiversity emergency

We note the strong feedback that Saddleworth Parish Council received on its Neighbourhood Plan to more extensively address considerations around biodiversity. It made changes to the plan to incorporate this into its cross-cutting approach to the environment, and therefore strongly support the policies contained within this chapter. We would only suggest one small change:

Policy N2

We would suggest that this policy would be enhanced by making it clear that offsite areas should be identified and included in planning applications before permission be granted.

Policy N3

We note that in policy N3, the limit for the application of points 5, 6 and 7, has been set at 20 homes rather than 10. This is inconsistent with the number of homes set out as relevant in Chapter 18. Although the footnote states that this is the level at which they have deemed it appropriate for meaningful green infrastructure, there is no reasoned justification to support this in the text. **We suggest that either the number is revised down, or a stronger reasoned justification provided for the higher number.**

That said, we note the strong conformity of the Neighbourhood Plan with this policy, in particular policy 1, green infrastructure.

Policy N4

We support the policy, and particularly welcome the additional protection of ancient woodland, which the Neighbourhood Plan is in strong conformity with. We note that within the Peak District National Park, and in the higher uplands of Saddleworth, where there is peatland, there should be a specific awareness of where there is a different requirement in terms of tree planting, and **would ask for a clear reference to the detail added by the Neighbourhood Plan.**

We note that there are examples here (CAVAT and GM LNRS) on the use of undefined acronyms or where the definition comes after the first use.

Chapter 15 Oldham's Historic Environment

Policy HE1

We would suggest that in particular, more detail is needed on point 6, which seeks to “acknowledge” and “recognise” historic assets. **We suggest that in order for this to be useful for planners, developers and residents, more clarity is required on what is meant by those terms in the reasoned justification, and an explanation of the weight being given to these assets in the planning process.**

Policy HE2

We note that the Neighbourhood Plan's heritage policy, policy 10, which is in strong conformity with this policy, and which gives more detail in specific circumstances.

Policy HE3

We note that two conservation area appraisals that have been done (separate to the Oldham Town Centre Conservation area) have not been included as part of the appendices to this document. While these appraisals are not recent, they are the best supporting information currently available, and **we would recommend their inclusion.**

Policy HE4

We are broadly supportive of the policy, but note that there are a number of mills which have already been converted (for example Victoria Mill in Lees), or are in use but which remain visually part of the wider street scene (Leesbrook in Lees) which do not seem to be referenced. **We would ask that consideration should be given to referencing these in the policy approach.**

Policy HE5

We are broadly supportive of the policy, but we note that it focuses on the setting and appearance of the canal, heritage and green infrastructure. **We would suggest that there should be a much wider exploration of benefits, particularly of already restored canals, including tourism assets.**

In the third paragraph of the policy, the text moves from plural to singular, only preventing harm to the appearance of a single canal (and it does not reference which). **We strongly suggest that the text should make clear that this not covers both reference canals, and that the policy should be rewritten in a way to make it clear that it covers previously restored canals, not just ones that are going to be.**

Chapter 16 Achieving high quality design

Policy D1

We support the policy. We also particularly note the Neighbourhood Plan policies on masterplans and Chew Brook Vale (11 and 12) and the strong conformity with this approach.

Policy D2

While we support the policy insofar as it goes, we have concerns that there references to advertising in conservation areas simply states that the advertising should be compliant with policies HE2 and HE3, which do not mention advertising. **We would strongly suggest that the advertising policy should actively strengthen the conditions applied to advertising in conservation areas if it is to have any impact.**

Policy D3

We would suggest removing “in Oldham” from the title. This is the Local Plan for the borough, and this does not need to be there.

We also note that there is no reference to antisocial behaviour. While this is referenced elsewhere in the document, and it could be implied here, **we suggest that it would be much clearer for this to be explicitly referenced here.** Neighbourhood Plan policy 13 on safety and wellbeing is in strong conformity with this policy (and would be even more so following this inclusion).

Policy D4

We support this policy.

Chapter 17 A Sustainable, Active, Accessible Network For Oldham

We would suggest removing “for Oldham” from the title. This is the Local Plan for the borough, and this does not need to be there.

Policy T1

In paragraph 2, **delete “on” before “the most appropriate modes”.**

In paragraph 5, **add an apostrophe to read “network’s accessibility”.**

The policy references the “Standedge Tunnels” project. We are not aware of any existing Standedge Tunnels project. **We suggest that if this is an existing policy, an explanation should be given.** However, there are no references to the electrification of the rail line, or to high speed rail. **Should these be included also?**

Policies T2, T3 and T4

We support these policies, and note the strong conformity of Neighbourhood Plan policies 19 (retail, commerce and industrial development), 24 (parking standards for housing), 28 (clean fuel vehicles).

In policy T3, we note the inclusion of policy looking at off-site parking and mitigation measures. We would suggest that it may be possible to include reference to existing guidance on the provision of sufficient visitor parking etc on larger developments, to increase the likelihood of developments meeting that guidance.

Policy T5

We support the policy. We note that the text on Holcroft Moss requires that any developments that require a Transport Assessment will need to consider air quality impacts on Holcroft Moss. While this may be appropriate for some, given the distance of much of the borough from Holcroft Moss, should this apply to all developments?

In the second paragraph from the end, delete the additional spaces before “National Highways”.

Chapter 18 Communities

Policy CO1

We support this policy, and note the strong conformity of policy 21 of the Neighbourhood Plan.

Policy CO2

Again, we note the possible inconsistency between policy N3 which refers to 20 homes, where this refers to 10 homes.

We note that the Open Spaces Study is included in the policy, but the reference to find it is only included in the reasoned justification which comes later, not in the first reference to it in the policy text. **We would suggest that the footnote with the reference is included at the first use.**

Policy CO3

We support the policy, and note the strong conformity of Neighbourhood Plan policies 21 (Tourism and leisure) and 23 (Services).

Policies CO4, CO5 and CO6

We support the policies and particularly note the strong conformity of Neighbourhood Plan policy 14 on Health, social care and education. We particularly note the strong

feedback from our consultation on the Neighbourhood Plan with regard to the demand for health facilities.

We are particularly supportive of the application of the approach to health with regards to a potential new Saddleworth Health Centre, which we are strongly supportive of.

Policy CO7

We note that Tameside's Local Plan policy includes a specific restriction on percentage of the shop front that can be taken up by hot food takeaways and fast-food outlets. This policy refers to an "unacceptable concentration", but gives no indication of what that level is, which could result in a lack of clarity for planners, developers and residents. **We would support the inclusion of clearer text on this to ensure the effectiveness of the policy.**

Chapter 19 Protecting our local environment

Policy LE1

We note that the policy references noise and vibration, and traffic movements. However, the title of the policy is "A High Standard of Amenity". **We suggest that this policy may require revision to address the full breadth of amenity.**

Policy LE2

We support this policy.

Policy LE3

We support this policy, and note the strong conformity of policy 29 of the Neighbourhood Plan with it.

Chapter 20 Infrastructure and Delivery in Oldham

We would suggest removing "in Oldham" from the title. This is the Local Plan for the borough, and this does not need to be there.

Policy IN1

We support this policy and particularly note the contribution of this in Saddleworth towards home working, and where there are some locations particularly affected by poor access to superfast broadband.

We note that the policy references that equipment lists a number of elements that the telecommunications equipment should not have a detrimental impact on, but does not mention impacts on human health and wildlife, drainage and sewerage. For the avoidance of doubt, this is not to give credence to some of the clearly disproven theories around the imagined impact of telecommunications equipment. However, we note that there is a small exclusion area around some masts for health and safety, and **we would strongly support the inclusion of references to that in the policy, as well**

as to other potential impacts such as the that of foundations for masts on drainage and sewerage.

Policy IN2

We support the policy, and in particular, note the references in Policy 14 of the Neighbourhood Plan to specific areas for planning obligations to support as preference.

Policy IN3

We support the policy.

Chapter 21 Monitoring

Policy M1

We support the policy.

From: Susan [REDACTED]
Sent: 20 March 2026 19:54
To: spi.consultations@oldham.gov.uk
Subject: Oldham Local Plan. Closing date 20-03-2026
Attachments: Letter email to Oldham Council re Oldham Local Plan.docx; Oldham Council Town Centre Consultation.docx

Importance: High

Dear Sir/Madam

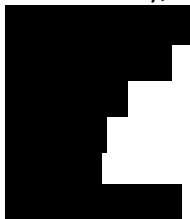
Please find attached two documents which are my response to the above consultation.

Stuart Beesley

**Oldham Local Plan
Part A**

Strategic Planning and
Information
Oldham Council,
First Floor Reception,
Spindles Shopping Centre,
Oldham.
OL1 1LA
20th March 2026

Mr S Beesley,



Please find attached my comments in response to the Oldham Local Plan.

I have found it difficult to allocate comments and amendments to specific paragraphs referred to within these voluminous documents (2 ring binders and 4 bound support documents each with a minimum of 100+ pages) so I have made references to policies and paragraphs at the end of my comments and suggested modifications in accordance with your request.

I must say from my experience of looking through these documents, for someone who is working and has a partner and children it must be extremely difficult to find the time for them to read through these documents and then make constructive comments in response.

In response to your questionnaire:

Q1 My details areas above.

Q2 Not applicable.

Q3 Applicable to Paragraph, Policy and Map.

Q4 I don't think it is sound for the reasons attached .

Q5 Reasons and modifications attached.

Q6 Ditto.

Q7 I would be interested in attending the hearing sessions.

Q8 I am interested.

Q9 Please keep me notified.

In addition I would ask if the Twentieth Century Society has been consulted on the Councils intention to demolish the buildings on the Civic Centre Site, which I would have thought would be the correct thing to do with such a prominent Civic Centre group of buildings designed by a very notable architect, Cecil Howitt and Partners, who was well known for his civic and public buildings?

Also I wonder if an architectural photographic record of these buildings was carried out prior to the public consultation process?

Yours faithfully

Stuart Beesley

Oldham Local Plan

Part B

My comments relate to the town centre and the Civic Centre Buildings in particular.

Civic Centre Site: comprising the low-rise Civic Ceremonial entrance facing Rochdale Road, West Street Queen Elizabeth Hall and the Tower at the top of West Street (Bounded by West Street, Rochdale Road, New Radcliffe Street)

These landmark buildings are a significant and prominent feature of the town centre and have been since the 1960s and 1979s when they were built. They are part of the town's more recent heritage both architectural and cultural and make a significant and irretrievable contribution to its townscape (should they be lost through demolition).

The buildings, not only the Ceremonial entrance on Rochdale Road and the tower in particular, is a visible 'wayfinding' guide that denotes the centre of the town from all major access routes. It is a distinctive feature of the town centre and contributes to both the local and wider regional landscape. They are built of natural materials of quality, predominantly of stone (not concrete) of varying colours and textures, materials which would not be used in any replacement for the same effect.

They are culturally significant buildings being both easy to identify and are the naturally recognised centre of Local Government in the town. They make a positive contribution to the townscape and create a distinctive sense of place by exhibiting confidence and dynamism, qualities which the town should continue to promote by the retention of these buildings.

Compared to other nearby towns, Oldham has no other significant Civic Buildings of their architectural and townscape quality at its core. These buildings forming the civic core should be recognised to be of significant townscape value and cultural quality and be allowed to continue to add to these functions as they have done for the last 50-60 years. Why seek to replace these buildings that currently contribute so much to the quality of the town's built environment? This I do not understand. If they are lost to the town what will be there to attract and retain visitors and make their experience much more valuable and memorable, more multi-storied living (which could be accommodated elsewhere within the Town centre)?

It would be a huge loss for the town if they were to be demolished and replaced by housing. The suggested replacement housing on this site is unlikely to match the quality of the existing buildings in terms of natural materials and architectural and townscape significance.

Buildings do and can change their uses without the loss of their contribution to their sense of place in the fabric of the urban landscape. The Post Office Tower in London is to change its use into a hotel, demonstrating that an unusual building such as this one can be adapted to new uses without the need for their demolition or destruction. This can be done with the Civic Centre Buildings.

These buildings are culturally significant to the town and reflect the Borough's Civic Pride and their physical presence should not be undervalued. To mention two examples: The Queen Elizabeth Hall was opened by Her Majesty Queen Elizabeth the Queen Mother and has been and continues to be used for many musical, social, recreational and sporting events (The first televised maximum break in snooker by Steve Davis). Oldham Athletics' sporting achievements were recognised and celebrated when thousands of members of the public filled Rochdale Road to celebrate their achievements on and in front of the ceremonial entrance podium of the Civic Centre. No other location or buildings would be sufficiently culturally significant to celebrate and recognise the achievements of the people of Oldham and the Town. Surely that is what these buildings were designed for, anything less (of a Location) would not pay sufficient tribute to individual or team endeavour or success. It is natural to recognise this, any other less significant site would be culturally inappropriate or give their achievements sufficient respect. I wonder where the civic dignitaries and football teams of Manchester would celebrate without their Town Hall?

The proposal to put housing on this part of the site would render the approach to this part of the town, bland, dull and uninteresting. It is extremely unlikely there would be anything unique or of distinctive character when compared with the current civic Centre buildings.

The external materials used to construct any replacement dwellings are extremely unlikely to be of the same quality i.e. the colour varieties and texture of natural stone.

The total environmental impact (carbon footprint, embedded energy, Co2 emissions etc) of the construction of housing and the demolition of the Civic Centre clearly would be a negative one compared with its retention and reuse.

The consultation document refers to the town's heritage and other assets and how they should be celebrated. I would suggest that these assets do not only have to include (considering the built environment) early historical examples but should take a longer view and include more recent 20th century additions that add to the townscape, architectural quality and civic pride and contribute to the Town's distinct and unique character and identity. The Civic Centre Buildings should be considered the current and more particularly the future assets of the built environment of the town. They should be retained as part of the town's history and development for the benefit of future generations before any short term economic and political pressures that come along and threaten their survival to the detriment of the town. Their retention and reuse would be the most sustainable way forward for these buildings.

The decision makers should recognise the importance of the Civic Centre buildings and value the contribution they make to the town. To sweep them away without recognising their cultural and townscape significance that celebrates the civic pride of the town would be a huge loss – from which future generations, when they look back at the town's development as described in these proposals, would lament the loss of the town centre's most significant landmark in the landscape and wonder why, when there is a viable alternative.

If as stated "sustainability and reuse is at the heart of these proposals" how can it be credible to demolish the Civic Centre Complex and redevelop the site with new-build homes? Re-use and adaptation must be the only credible way forward for these buildings. Their demolition does not fit with the policy of "sustainability and reuse" as stated in the consultation documents, which is to say the least, contradictory.

Oldham's Civic buildings are the best and most significant buildings (in terms of their contribution to the town's civic pride, culture, architecture, townscape and its history) since the post war period. They are part of the town's heritage and make a significant contribution to the town's identity and sense of place. There are no other buildings in any part of the borough that contribute in this way.

Looking at the proposal from a tourism perspective the complex makes a significant contribution to the attractiveness and sense of place by virtue of amongst other things, its position on an elevated site and its scale and massing. Would a visitor remember as part of their recollection and visitor experience the imposing civic buildings or more cloned multi-storeyed flats?

Their demolition does not fit with "sustainability and reuse". Reuse and adaptation must be the only credible way forward, not demolition. I am sure with sufficient will, determination and resolve on the Council's part this can be achieved.

Modification

From looking at the previously referenced Area 1 map, one obvious (there must be others) sustainable solution is the relocation of the proposed Eton Star College. The proposed plan indicates land (approximately 1.7 Hectares) allocated to the Eton Star College site on the existing covered market and its associated car park. Surely this land could be reallocated for new homes and the Eton Star College be accommodated within the prestigious Civic Centre complex (approximately 2.0 Hectares). Thereby showing how Eton could be associated with the town, not only by its presence and its valuable input but also by saving the town's largest cultural asset. Such a reallocation would contribute towards the loss of proposed homes on the Civic Centre site and reduce the costs for Eaton Star. It would also be viewed as a better aspirational fit; by being opposite the town's other college buildings on Rochdale Road.

In the 176th Anniversary of the Borough I trust the Council are sincere in their vision of sustainability and re-use within this document and that they will find a sustainable solution for saving the Civic Centre buildings.

So for the sake of approximately 0.3 Hectares of land (which could be recovered by adopting a policy of a presumption in favour of housing on 'undesigned land' for housing associations and self-build groups) the town would lose its chief architectural and cultural asset, forever.

I cannot remember all the policies or particular paragraphs; however those that come to mind include those on:

Tourism and the need to attract visitors.

Those that seek and enhance Oldham Centre.

Cultural Assets.

Those that protect, conserve and enhance the character of the town centre.

Climate change and the adaption and reuse of existing buildings.

Sustainability and the carbon impact and the need to take the long view of older buildings and their effectiveness in sustainability and the whole building approach.

From: Planning [REDACTED]
Sent: 26 March 2026 16:06
To: SPI Consultations
Subject: Oldham Local Plan: Publication Plan Consultation - Representation from Manchester Airports Group
Attachments: Oldham Publication Version Local Plan - MAG response.pdf

Dear Strategic Planning and Information Team,

Thank you for consulting MAG on the Oldham Local Plan: Publication Plan. Please find attached our consultation response.

Kind regards,

Natalie

Natalie Belford
Senior Planner
MAG Strategic Planning
Manchester Airport, Olympic House, Manchester, M90 1QX
[REDACTED]



C2 - Internal

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Our main operating entities are MAG Airport Limited, a private limited company, registered in England under Company Number 11748654, with the Registered Office at 6th Floor, Olympic House, Manchester Airport, Manchester, United Kingdom, M90 1QX; Manchester Airport PLC, a public limited company, registered in England under Company Number 01960988, with the Registered Office at Manchester, Professional Services Limited, PO BOX 532, Town Hall, Manchester, M60 2LA; Stansted Airport Limited, is a private limited company, registered in England under Company Number 01990920, with the Registered Office at Enterprise House, Stansted Airport, Bassingbourn Road, Essex CM24 1QW; East Midlands International Airport Limited, a private limited company, registered in England under Company Number 02078271, with the Registered Office at East Midlands Airport, Pathfinder House, Castle Donington, Derby, East Midlands, DE74 2SA; Manchester Airport Group US Holdings Inc, 101 N Wacker Dr STE 101A, Chicago, IL 60606.

C2 - Internal

26th March 2026

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

By email

Dear Strategic Planning Team,

OLDHAM LOCAL PLAN – PUBLICATION PLAN CONSULTATION

Thank you for consulting Manchester Airports Group (MAG) on the Publication version of the Oldham Local Plan.

Our representations follow those that we made on the draft Local Plan in February 2024 relating to the requirement for policy protection to ensure that the safety and efficiency of Manchester Airport and its associated aircraft operations are not compromised when considering certain characteristics of development. We are pleased that relevant provisions have subsequently been included within policies CC1, D1 and IN1 as set out below.

We welcome the following specific provisions that have been included within policies CC1(1) and CC1(12), D1(b) and IN1(4):

CC1 – Renewable and Low Carbon Energy

Proposals for renewable and low carbon energy development including supporting infrastructure, will be supported where the following criteria have been appropriately addressed:

- 1. Local amenity, including noise, air quality, traffic, vibration, dust and visual impact, light (including reflection, glint, glare and shadow flicker);*
- 12. Telecommunications and other networks, including operational equipment required to connect to the National Grid, electromagnetic production and interference and aeronautical impacts such as radar systems;*

We do not seek any modification to this policy text.

D1 – Achieving High Quality Design

In addition to the above development proposals involving tall buildings should:

- b. not unduly affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing and shading, noise, reflected glare, aviation, navigation and telecommunication interference;*

Whilst we do not seek any modification to this particular part of the text, we wish to bring to your attention that there are some areas 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. Please refer to the aerodrome safeguarding map for Manchester Airport for further details on the extent of these areas and the requirement for consultation with us. We therefore 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, or whether you consider the text included at D1(1) requiring developments to be “appropriate, in terms of their form, massing and height, for the site and surrounding context” could be applied in relation to any adverse impact to aviation caused by developments other than tall buildings.

Policy IN1 – Digital Infrastructure and Telecommunications

New masts or telecommunications equipment will be permitted where:

- 4. it can be demonstrated that the equipment will not cause any interference with other electrical equipment or detrimental impact on air traffic safety;*

We do not seek any modification to this policy text.

Further details relating to these policy requirements, and justification for their inclusion, are set out below.

By virtue of its importance to the national air transport system, Manchester Airport is an officially safeguarded aerodrome. This is to protect the safe and efficient operation of aircraft at and in the Airport’s vicinity. Legislative provisions regarding the safeguarding process are set out in ODPM/DfT Circular 1/2003 – Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas. In accordance with this Circular, Manchester Airport is a statutory consultee for certain planning applications for developments that require safeguarding to protect the safety of the Airport’s operation. Principal considerations are whether the development may cause, inter alia: an obstacle; an attraction to birds that increases the risk of bird strike; light or reflection that might present a visual hazard; interference with radar and other air navigation and communication systems; and whether the construction process will present any hazard to aircraft safety. Safeguarding maps (which are held by the LPA) show the extent of the safeguarded area and set out the requirements for statutory consultation with us. Within the borough of Oldham statutory consultation with Manchester Airport is required for:

- All buildings, structures, erections or works that exceed the heights indicated on the Safeguarding Map – these may cause an obstacle and/or impact on radar.
- Proposals that might cause interference with radar and other air navigation and communication systems (e.g. wind turbines) within 30km of the aerodrome.

- Proposals that include lighting or reflective surfaces that could interfere with navigation aids or present an ocular hazard.

Thank you again for the opportunity to comment on your Publication Plan. We trust that our comments have been useful but please don't hesitate to contact us should you wish to discuss any of the matters raised in more detail.

Yours sincerely,



Natalie Belford, MRTPI
Planner

From: Bolotkov, Ivan [REDACTED]
Sent: 24 March 2026 13:54
To: SPI Consultations
Subject: FW: consultation

Importance: High

Dear all,

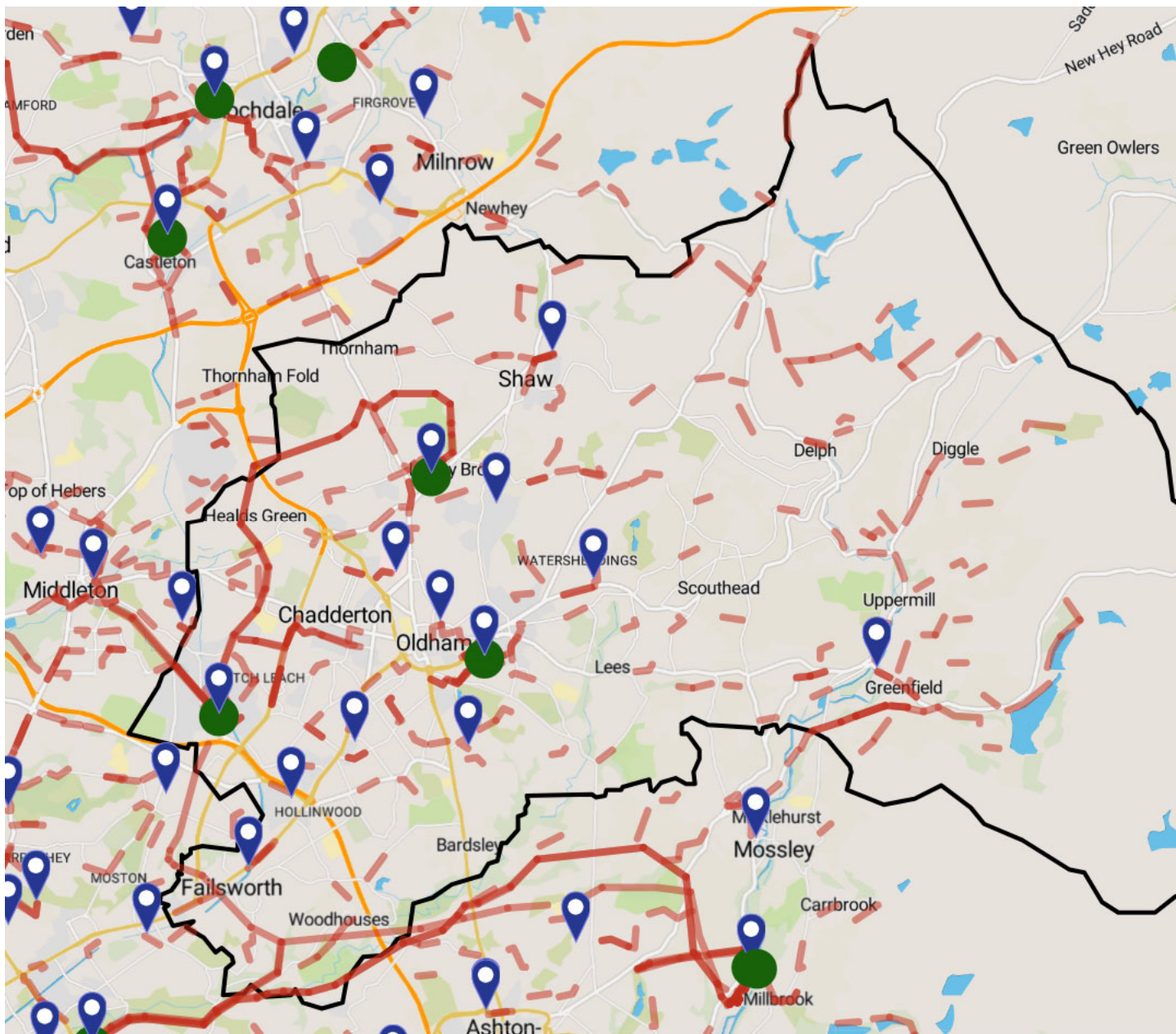
Please see below the SP ENW input into the consultation.

Provision of existing distribution electrical infrastrucure.

In the North West of England the local electricity distribution network is owned, operated and maintained by SP Electricity North West (SP ENW).

SP ENW are connected and take power supply from National Grid's transmission system via Grid Supply Points (GSPs). Electricity in Oldham borough is mainly fed from Whitegate GSP with the remaining demand is fed from Stalybridge GSP.

Electricity infrastructure in the borough shown on the map below:



The highlighted black border line depicts Oldham Borough boundaries within the SP ENW network service area. The solid green dots show BSPs within Oldham Borough boundaries.

The blue map markers show primary substations within Oldham Borough boundaries. The red lines show connectivity between substations.

Forecasting future demand and future electrical infrastructure provision

SP ENW outline their forecasts of electricity demand and generation, along with actions to address them in their Distribution Future Electricity Scenarios (DFES). The document is published on an annual basis, the latest being January 2025. The document is informed by planned development provided by local authorities. There are regular engagements between SP ENW and the council to make sure that forecasts of future capacity needs reflect planned growth and development. DFES is used to inform and shape [Network Development Plan \(NDP\)](#). NDP provides information on how SP ENW intend to create capacity over the period of the plan with specific interventions. It provides stakeholders with visibility on future infrastructure provision and every 2 years SP ENW will

present the best view of planned network interventions for the next 10 years. The 2026 Network Development Plan will be published on 1 May 2026.

As part of our [capital investment programme 2023-28](#), we're delivering significant network investment in Oldham. This £13m investment project will transform the EHV electricity infrastructure throughout Oldham and the surrounding areas. Once complete, more than 42000 local homes and businesses will benefit from the new electricity supply along with supporting clean growth and the increased demand required to connect low carbon technologies. [£13m Oldham investment](#)
SP ENW are currently preparing their RIIO-ED3 business plan for the 2028-2033 period.

Ivan



Ivan Bolotkov MSc, MIET | Network Development Engineer | Distribution System Operation (DSO)



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Internal Use

From: Matthew Broadbent [REDACTED]
Sent: 27 March 2026 07:55
To: SPI Consultations
Subject: Oldham Local Plan representation
Attachments: Representation for Local Plan v2 (Matthew Broadbent).docx

Dear Sir,

Please find attached my submission to the Oldham Local Plan consultation.

Yours sincerely,

Matthew Broadbent

--

This email has been checked for viruses by Avast antivirus software.
www.avast.com



Oldham Local Plan
Publication Plan Stage Representation Form

Ref:

**(For official
use only)**

Comments are invited until 11.59pm on Friday 27 March 2026

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

Please return this form by:

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

Alternatively, please complete the online response form via the Council's consultation platform at <https://bigoldhamconvo.oldham.gov.uk/>

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 and names will be published. Full details of how your information will be shared can be found in the Strategic Planning and Information Privacy Notice which can be found on the council's website at

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

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mr	
First Name	Matthew	
Last Name	Broadbent	
Job Title (where relevant)	Data scientist	
Organisation (where relevant)	Save Royton's Greenbelt	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

H2

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Permitted exceptions need to be supported by evidence to be justified. Paragraph 8.15 rightly accepts there needs to be an evidence threshold, so this should be incorporated directly into the policy.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Council will assess this on a site-by-site basis and only allow exceptions where necessary **and fully evidenced**.

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

H3

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Requiring evidence for only some of the criteria, undermines the others where it is not explicitly required. Modifying criterion #4 so that it mirrors the wording in criterion #1 strengthens the policy and ensures that deviations from the prescribed mix are transparent and supported by evidence.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

4. **It can be clearly evidenced** 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.

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

H5

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Concerns about the effectiveness of the policy.

Places for Everyone is, first and foremost, intended to be a brownfield-first plan (see JP-Strat 6) but there is very little set out at policy level that will achieve that objective. Urban regeneration needs to be appropriately incentivised to take some of the pressure off green spaces. Regular brownfield properties are often cheaper than discounted greenfield properties, so incentivising brownfield development may still deliver more genuinely affordable housing in the long-term.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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”.

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	H6	Policies Map	
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4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes		No	<input checked="" type="text" value="x"/>
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Criterion #2 – Without the necessary evidence, criterion #2 is a toothless tiger. At the Planning Committee meeting on 11th March 2026, during the discussion of FUL/355367/25 (3 Kevin Avenue, Royton, Oldham, OL2 6AH), it emerged that the council did not know how many HMOs were operating the area. In addition, it was also revealed that a female resident had conducted her own HMO survey, by going around knocking on doors. If residents feel compelled to undertake such a course of action because the council lacks sufficient data about HMOs in the area, this could put them at risk. The burden of proof should not rest on residents. The policy needs to be explicitly affirmative, in that the council should be able to evidence that a planning application meets the criteria before approving.

Criterion #3 – Being able to build a relationship with a neighbour is an important aspect of residential amenity, and being sandwiched by HMOs potentially jeopardises this. Conversion to an HMO does not preclude neighbourly relations but—given the nature of HMOs—relationships are likely to be more transitory. Good neighbourly relations can contribute to social cohesion and crime prevention, and even informal social care if a resident is elderly or disabled. Therefore, I propose extending the scope of criterion #3.

New criterion #5 – The loss of family housing where there is an acute shortage formed part of the basis for introducing the Article 4 Direction, so the council has already evidenced that Policy H6 can potentially undermine Policy H3 (Housing Mix) if not correctly managed. Therefore, I have proposed a new criterion modelled on Policy H2 in the Bath & Somerset Local Plan.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy H6 - Houses in Multiple Occupation

Houses in Multiple Occupation (HMOs) will be supported where the proposed development:

1. Does not result in the loss of, or impact on the character or amenity to the area as a consequence of increased traffic, noise or general disturbance;
2. **It can be clearly evidenced it** does not result in an undue concentration of HMO provision in any particular area of the borough. Permission may not be granted where the proportion of HMOs (either C4 or Sui Generis) will result in HMOs representing 10% or more of properties within a 50 metre radius measured from the centre of the application site;
4. Complies with the relevant design and amenity standards as outlined in policy D1, and any existing or future HMO standards or guidance developed by the Council.
3. Ensures:
 - a) that no two adjacent properties apart from those that are separated by a road are converted to HMOs, and
 - b) that a residential property is not sandwiched by two HMOs;**
- 5. The HMO use contributes to the unacceptable loss of accommodation in a locality, in terms of mix, size and type;**

[Rest of policy]

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	E1	Policies Map	
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4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes		No	<input checked="" type="text" value="x"/>
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

There are two problems with Policy E1:

1) The policy reverse engineers the PfE targets to Oldham-level targets. Basing provision on the share of land supply, as opposed to evidenced need, weakens the evidential basis of the targets. The PfE targets are derived from the "gross needs" of the constituent PfE districts and outlined in document "05.01.02 Employment Land Needs in Greater Manchester" (Table A2). There, it sets out Oldham's gross annual need of 3.6 sqm of office floorspace and 10.1 sqm of industrial and warehousing floorspace. For a 17-year period (2022–2039), this amounts to a gross need of 61,200 sqm of office floorspace and 171,700 sqm of I&W floorspace i.e. the proposed Local Plan policy artificially inflates the I&W target and suppresses the office floorspace target, in relation to evidenced need.

2) Oldham's policy glosses over the fact that the PfE policy relates to land supply requirements, not deliverable floorspace (note the caveat in JP-J4: "To achieve this, **a high level of choice and flexibility will be provided in the supply of sites** for new industrial and warehousing floorspace"). This is quantified as a 5-year "flexibility allowance" by Table A2 in the Employment Land Needs paper. While the land supply totals relate to the original 2021–2037 term of the plan, they are easily adaptable to the revised 17-year term i.e. 17 years gross need + 5 years for flexibility.

The policy as it stands, invokes an unnecessary mathematical calculation and conflates two distinct concepts i.e. that of gross need that should be delivered, and that of land provision which also includes flexibility in the supply.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To contribute towards achieving the overall employment floorspace requirements set out in PfE policies JP-J3 and JP-J4, **ensure the following:**

- (a) there is sufficient land supply for 79,200 sqm of office (E(g)(i)) floorspace, and deliver at least 61,200 sqm.**
- (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.**

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

CC1

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

A particular concern is that Oldham Council has a tendency to treat renewable energy infrastructure in the Green Belt as permitted development, rather than something that must be evidenced and justified. For example, in one particular application for a BESS (Medlock Rd; FUL/353405/24), the applicant argued that the BESS was restricted to a maximum distance of 2.3km from the connection point in Droylsden. This explanation was accepted at face value without testing the claim against evidence. Given that it is fairly common for BESS units to be located at much further distances away from connection points, it is not clear why such a tight restriction applied in this instance. Therefore, Very Special Circumstances need to be evidenced (not just demonstrated) and where technical claims are advanced as part of the reasoning for building renewable energy infrastructure in the Green Belt, it is crucial that such claims are clearly evidenced.

Furthermore, the accompanying justification for Policy CC1 appears to establish the expectation that the Local Plan will support Oldham's Local Area Energy Plan which, in turn, identifies huge tracts of Green Belt as potential sites for renewable energy infrastructure such as solar farms. However, this document does not provide any form or evidencing and justification for building this infrastructure in the Green Belt. National policy does not identify renewable energy infrastructure in the Green Belt as permitted development, so it is necessary to embed in the Local Plan the requirement that building such infrastructure needs to be fully evidenced and justified.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

6. The openness of the Green Belt and whether very special circumstances have been demonstrated to justify otherwise inappropriate development, **and any technical reasons that are advanced as part of the reasoning for building in the Green Belt must have been clearly evidenced;**

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

CC2

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Criterion (d) requires that development should not increase flood risk elsewhere. However, the current wording lacks sufficient precision to ensure that this requirement can be applied effectively in practice. In particular, the policy does not require assessment of the timing of surface water discharge or the cumulative impacts of development across the wider catchment. As a result, compliance is often demonstrated through adherence to greenfield runoff rates alone, which does not guarantee to not increase flood risk.

A brief example will help highlight the weakness of the policy: the Bullcote Lane development (FUL/355603/26) proposed to discharge surface/flood water via a SuDS into the River Beal, capped at greenfield runoff rates. Given that only a percentage of the greenfield runoff would enter the river, capping discharge rate at the greenfield runoff rate may not be representative of the volume of water and the rate at which it would otherwise enter the river. The Oldham Council Hybrid SFRA (Volume III: Level 2 SFRA; 2010) identified Shaw/River Beal (downstream from Bullcote Green) as a Critical Drainage Area and noted the following: "A large amount of development is planned for this catchment, which has the potential to increase flood risk downstream in the River Roch catchment if surface water discharges are not carefully managed. The SFRA analysis shows that there is a high risk of surface water flooding to properties in the Shaw area, although many of these properties may be at direct risk of flooding from the River Beal." Whilst the Council's SFRA advocates for removing water from a development at greenfield runoff rates, there is no recognition of the downstream flood risk in the Bullcote Lane FRA.

The Council's proposed policy simply 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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

d) The development will not increase flood risk elsewhere, **taking into account the cumulative impacts of development within the wider catchment. This must be evidenced through an assessment of both the rate and timing of surface water discharge, including the potential for coincident peak flows and extended duration of runoff, and must show that the proposal does not exacerbate flood risk at sensitive receptors or known flooding locations.**

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

CC3

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CC3 provides a strong framework for sustainable drainage design, particularly in relation to the surface water hierarchy and the use of SuDS. However, the policy focuses primarily on controlling discharge rates and volumes, and does not explicitly require consideration of the timing and duration of runoff or its interaction with receiving watercourses. As highlighted by my proposed modification to CC2, reliance on greenfield runoff rates alone may not fully address downstream flood risk, particularly where attenuated flows coincide with peak river conditions or where multiple developments contribute cumulatively. A minor modification is therefore recommended to ensure that drainage strategies consider the timing and routing of flows, to support the effective implementation of Policy CC2.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposals should be designed to maximise the retention of surface water onsite and minimise the volume, and rate of, surface water discharge off-site.

Developments on greenfield sites are expected to achieve greenfield run off rates.

Developments on brownfield sites will be required to achieve greenfield run off rates, particularly within Critical Drainage Areas. A relaxation on outflow controls and/or the extent of attenuation storage will only be permitted with the agreement of the LLFA and LPA at an early stage of the project but should never exceed the rate of discharge from the existing development. Applicants will submit clear evidence of existing operational connections from the site with associated calculations on rates of discharge to demonstrate any reduction that deviate from achieving greenfield run off rates.

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.

[REST OF POLICY]

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

CC5

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CC5 requires a quantitative and qualitative risk assessment but does not specify that such assessments should consider off-site sources of contamination or the potential for development to alter or create pathways for contaminant migration. In practice, this may result in assessments that are limited to site boundaries and do not fully account for interactions with adjacent land uses or the influence of drainage and construction activities on groundwater movement, which is not consistent with the source-pathway-receptor methodology. We encountered an example of this in the Bullcote planning application, where the controlled waters risk assessment discovered contaminants on the site and theorized that they may have laterally migrated from an off-site nearby landfill, but the applicant not investigate the issue further. To ensure the policy operates effectively in protecting groundwater and public water supply, it is recommended that criterion #1 be amended to explicitly require consideration of off-site sources and dynamic pathways.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Risk Assessment - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection, **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;**

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

OL5

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The current policy focuses on the design and specification of lighting but does not address how lighting is operated over time. In practice, lighting—particularly modern high-intensity LED lighting—often remains in use throughout the night even where it is not required. This undermines the aim of protecting dark skies and tranquillity. As "GN01 For the reduction of obtrusive light 2021" notes, LEDs emit light at the blue end of the spectrum (unlike the old sodium amber lights) which can have an adverse effect on fauna and wildlife.

LED lights also have a greater impact on night-time pursuits such as astronomy. You used to be able to get relatively good views from the garden under the old sodium lights, but blue light is virtually impossible to filter out with the kind of telescopes used by amateur astronomers, leading to a decline in this once great hobby. Blue light has also proven to be more disruptive to sleep patterns, which can have a knock-on effect for daytime energy levels, productivity and attention spans.

As the justification for the policy notes, there is very little empirical evidence that brightly lit areas reduce crime and accidents. By explicitly requiring consideration of the duration and control of lighting, the policy would be more effective and better aligned with the National Planning Policy Framework, which expects planning decisions to limit the impact of light pollution on amenity, intrinsically dark landscapes, and the natural environment.

(Continue on a separate sheet /expand box if necessary)

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(a) The proposed lighting is the minimum required for security or working purposes, **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;**

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

N1

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The current wording does not explicitly require consideration of cumulative or masterplan-wide ecological impacts. As a result, the design of key infrastructure can be fixed through incremental applications without a full understanding of their ecological effects across the wider area. An example of this would be the spine road proposed by the Beal Valley-Broadbent Moss masterplan: the proposed route of the spine road has not been subject to an ecological appraisal, so its ecological impact is not fully understood. The Bullcote Lane development (effectively phase 1 of the masterplan), will implement part of the spine road and effectively lock in the design, despite the fact only the section within the red-line boundary of the planning application has been surveyed. This creates a risk that: habitats are fragmented; ecological corridors are severed; and the overall integrity of the ecological network is undermined.

The policy needs to be strengthened to ensure consistency with the strategic approach in Places for Everyone Joint Development Plan (in particular Policy JP-G8), which seeks to avoid the fragmentation of habitats and maintain ecological connectivity. It would also ensure that decisions are based on a complete understanding of impacts, rather than being determined by the artificial boundaries of individual planning applications.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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. **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.**

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	14.20	Policy		Policies Map	
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4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes		No	<input checked="" type="text"/>
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The current wording presents a definitive statement that peat is not irreplaceable habitat, which risks underplaying its ecological importance and does not fully reflect the conclusions reached at the Places for Everyone examination. Clarification is needed to: ensure consistency with the evidence and conclusions considered through the PfE examination (see examination hearing documents OD42 and IN37); avoid creating an overly rigid interpretation that could undervalue restorable peat; and reinforce the need for case-by-case ecological assessment, particularly in areas where peatland contributes to wider habitat networks.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

14.20 Restorable peat has an important role to play in supporting notable habitats (including blanket bog, lowland raised bog and fens) and for carbon storage. **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.**

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

HE4

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the principle behind the Oldham Mills Strategy is sound, there are aspects at policy level that appear to be at cross purposes with the other policies in the Local Plan and Places for Everyone. In the shape of the Mills Strategy, the Local Plan appears to give an equivalent level of protection to local-level conservation status that it does to nationally protected assets, such as the Green Belt, priority habitats and listed buildings.

A second concern is how the criteria for that conservation status is arrived at: it is not especially clear, but as far as I can make out, the "priority" level of a mill is arrived at via a qualified judgment of a combination of factors, such as historical and architectural significance, and also the contribution it makes to the "sense of place" and how it impacts on the landscape. Architectural and historical significance can be objectively assessed, as can impact on the landscape to some extent, but "sense of place" is largely subjective. One person's eyesore is another person's connection to the past. It is not obvious how the gradings relating to "sense of place" were arrived at. Apparently, a consultation was held during 2020, but it appears to have been confined to property professionals and various historical organizations and excluded the public.

The concept of mill "clusters" is particularly problematic: 26 mills form seven clusters, and 23 of these mills have been categorised as "high" or "medium" priority, for which the presumption against demotion would apply. However, these classifications would appear to derive mostly from "sense of place" and landscape impact considerations, because none of them were graded "High" for either architectural or historical significance. The upshot is that mills, with no real architectural or historical significance, are being conserved because they are in close proximity to other mills—an arbitrary criteria that is entirely subjective and not backed up by any empirical evidence. The importance the council bestows on the landscape impact seems incongruous with how they approached allocating protected open land for development in Places for Everyone. The planning inspectors acknowledged that Oldham's strategic allocations in Places for Everyone would be harmful to the purpose of keeping land open, but they concluded that it was necessary in order for Oldham to maintain a flexible supply of housing and employment land. In addition, the government has also created the category of

grey belt in order to source enough land to meet its 1.5 million housing target, so I question whether the highly protectionist approach adopted here can be justified.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy HE4 – Oldham’s Mills

The Council will proactively support, through planning decisions and in fulfilling its wider functions, proposals that establish a positive future for Oldham’s Textile Mills through their reuse and repair. Development proposals affecting Oldham’s mill stock will need to be supported by a robust assessment of viability, heritage significance and structural and building condition, **in line with having regard to the findings of the Mills Strategy, which should be treated as a material consideration rather than a definitive classification.**

Proposals should retain those elements of the mill stock which contribute to the local identity and sense of place of Oldham and ensure they are appropriately conserved in a manner appropriate to their significance. Development proposals will be assessed having regard to the following criteria relevant to the identified level of priority and clusters contained within the Oldham Mills Strategy

All proposals will be assessed on a site-by-site basis, having regard to the individual heritage significance, condition, viability and deliverability of the asset.

High Priority Mills:

The high priority mills make a clear positive contribution to local character and distinctiveness and are identified as non-designated heritage assets. The Council will support applications which include the retention and reuse of the identified high priority mills and all associated buildings and structures. **Where it is clearly evidenced that retention and reuse is not viable, including having regard to structural condition and the requirements of meeting relevant environmental and building standards, alternative approaches including partial or full redevelopment may be supported where they deliver public benefits.**

Medium Priority Mills:

The Council will actively encourage and support applications that include the retention and reuse of identified medium priority mills and associated buildings and structures. Development proposals that include the alteration, extension or demolition of any medium priority mills and their associated buildings will need to demonstrate with clear justification, in relation to the significance and setting of the asset and identified public benefits. **Where it is clearly evidenced that retention and reuse is not viable, alternative approaches including redevelopment may be supported.**

Low Priority Mills:

The identified low priority mills are generally considerably altered and make a limited contribution to local distinctiveness and sense of place. Development proposals involving the comprehensive redevelopment of low priority mills and / or their retention will be supported in principle subject to compliance with other policies of the Local Plan.

Mill Clusters

[Drop this part of the policy]

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

17.33

Policy

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

☐

No

☐

2. Sound

Yes

☐

No

☐

3. Complies with the Duty to Co-operate

Yes

☐

No

☐

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Typographical error. Paragraphs 17.33 to 17.37 have been misnumbered.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	CO5	Policies Map	
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4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes		No	x
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Based on the pupil yield in paragraph 18.52, then 11,560 homes will generate a need for 5,318 primary school places and 3,352 secondary school places. To provide a sense of scale, this would be equivalent to 19 new conventionally sized primary schools, and 3 secondary schools. Even using more conservative pupil yield estimates from Homes England (0.25 per home for primary school places, and 0.13 for secondary school places) result in 2,890 new primary school places and 1,503 secondary school places. Whilst Policy CO5 provides a mechanism for securing developer contributions towards education provision, there is insufficient evidence to demonstrate that the scale of education demand arising from the Plan's housing requirement can be accommodated.

The Infrastructure Delivery Plan (IDP) states that 77% of primary schools (46 out of 86) in the borough are under capacity, and 79% (11 out of 14) secondary schools are; however, it does not quantify this capacity in a way that allows a clear comparison with the forecast demand arising from planned growth, nor does it demonstrate how capacity is distributed relative to the spatial pattern of development, and how up-to-date the council's data is.

By way of example, the Statement of Educational Capacity (2025) for the Bullcote Lane planning application, based its analysis on a 2020 dataset, which it clarified as "According to the latest data available in the public domain". Data underpinning Local Plans should be up-to-date and no more than two years old according to the Procedure Guide for Local Plan Examinations. The Statement of Educational Capacity states that there are 28 surplus places at Thorp Primary School, but a submission on the planning portal by an employee of Thorp Primary states that this is incorrect and that—at the time of writing in February 2026—the school only had 18 surplus places. At best, the council has supplied insufficient evidence to be able to formulate a conclusion in regards to the soundness of the policy; at worst, it does not know how many school places are available.

Furthermore, there is no clear assessment of the realistic potential to expand existing schools, or the extent to which new school provision may be required. As a result, it is unclear whether the cumulative impact of development can be accommodated through the mechanisms set out

in Policy CO5, particularly in areas of significant growth. This raises concerns regarding the effectiveness and deliverability of the Plan.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To conclude whether Policy CO5 is deliverable, the following questions needs to be answered:

1. What is the current (i.e. no older than 2024) baseline position in terms of available primary, secondary, early years and SEND school places across the borough, and how is this capacity distributed geographically relative to the locations of planned housing growth?
2. Based on the Plan's housing requirement and mix, what is the Council's forecast of additional pupil places required over the plan period, including the assumptions used regarding pupil yield?
3. How does the forecast demand for school places compare with:
 - a) existing spare capacity within schools; and
 - b) the realistic potential to expand existing schools?
4. Has the Council undertaken an assessment of the ability of existing schools to expand (for example site constraints, availability of land, impacts on playing fields and outdoor space, and operational considerations)? If so, what are the conclusions?
5. Where existing schools cannot realistically accommodate additional demand, how does the Council intend to provide new education facilities, and are any sites identified or safeguarded for this purpose?
6. How will the Council ensure that education provision is delivered in the correct locations and at the appropriate time relative to the phasing of housing development?
7. Given that the Infrastructure Delivery Plan indicates spare capacity at a borough-wide level, how has the Council ensured that this capacity is sufficient to accommodate cumulative demand arising from the scale of growth proposed in the Plan?
8. Is the Council satisfied that reliance on developer contributions secured through Policy CO5 is sufficient to deliver the scale of education infrastructure that may be required? Please provide evidence to support this conclusion.

(Continue on a separate sheet /expand box if necessary)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

LE3

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The policy as currently drafted allows developments to be assessed in isolation, meaning that incremental impacts in already constrained areas can be accepted even where there is clear evidence that cumulative development will lead to unacceptable air quality and congestion without mitigation. This undermines the effectiveness of the policy and is not consistent with the requirement to consider cumulative environmental effects. Many air quality assessments that form part of a planning application argue that the impact will be negligible and this is probably true in most cases, but if they come forward in an area where air quality is already poor—or worsening—then they will contribute cumulatively to a deteriorating situation. It is by this type of incremental development that we ended up with Air Quality Management Areas in the first place.

This kind of argument was advanced by the Bullcote Lane planning application. It argued that the impact on the Oldham Rd/Shaw Rd/Broadway junction would be negligible, despite this junction being part of an AQMA and its own Air Quality Assessment highlighting there was limited headroom for nitrogen dioxide exceedances at sensitive receptors. It also completely ignored that the Transport Locality Assessment in Places for Everyone evidenced that this junction would be pushed beyond operational capacity by 2040 if not mitigated. An effective policy would recognise that such assessments should take stock of the role of incremental development in a failing situation.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy LE3 - Air Quality

The Council will seek to improve air quality within the borough and contribute towards the achievement of national air quality objectives and Greater Manchester's Clean Air Plan.

Development will be supported in line with PfE policies that does not:

1. Impede the achievement of any air quality objective(s), **including through incremental increases in pollutant concentrations in areas where baseline levels are already elevated or where there is limited capacity to accommodate additional emissions**, particularly in locations declared as Air Quality Management Areas (AQMAs);
2. Introduce a significant new source of any air pollutant, including odour, fumes, smoke, dust and other sources; and
3. Increase exposure to poor air quality, particularly where vulnerable people are located (such as health care facilities, care homes or schools).

[New criterion]: Result in unacceptable cumulative air quality impacts when considered alongside committed, allocated or reasonably foreseeable development, including phased development of wider sites;

Air Quality Assessments will be required to support planning applications for the following:

4. Residential development of over 100 dwellings
5. Development involving more than 10,000m² of floorspace
6. Developments which introduce new exposure into an area of existing poor air quality (e.g., an AQMA)

Air Quality Assessments must consider cumulative and in-combination effects, including the impacts of wider allocations, phased development and associated infrastructure identified through strategic plans.

Where the acceptability of development is dependent on the delivery of transport or other mitigation infrastructure, proposals must demonstrate how and when such measures will be secured and delivered, and the interim impacts prior to their implementation.

Depending on the scale and nature of the development proposed, Air Quality Assessments may be required to support other applications including industrial processes where there are direct emissions to the air, as well as proposals with significant vehicle movements and significant changes to highways infrastructure.

Development that is likely to produce an odour, should demonstrate that there is no negative impact on residential amenity by providing an Odour Impact Assessment.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐ YES

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I do not consider it necessary. The appointed inspectors will have my points before them, and if they wish to probe them further then I am happy to make myself available.

I represented Save Royton's Greenbelt at the examination hearings for Places for Everyone so I am acquainted with the examination process.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Finally, please tick whether you wish to be notified of any of the following:

☐ YES

Submission of the Oldham Local Plan: Publication Plan for independent examination.

☐ YES

Publication of the Inspector's Report on the Examination of the Oldham Local Plan: Publication Plan.

☐ YES

The Adoption of the Oldham Local Plan.

From: NG Planning [REDACTED]
Sent: 18 March 2026 16:22
To: SPI Consultations
Subject: Oldham Publication Plan Consultation - NGET Response
Attachments: Oldham Publication Plan Consultation - NGET Response.pdf

Dear Sir / Madam,

**Oldham Publication Plan Consultation February – March 2026
Representations on behalf of National Grid Electricity Transmission (NGET)**

National Grid Electricity Transmission (NGET) has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the attached representation with regard to the current consultation on the above document.

If you require any further information in respect of this letter, then please contact us.

With kind regards,
Andrew

18 March 2026

Oldham Borough Council
spi.consultations@oldham.gov.uk
via email only

Dear Sir /Madam,

Oldham Publication Plan Consultation February – March 2026 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site	Asset Description
Business and Employment Area 3 Greengate/Broadgate	VJ ROUTE: 275Kv Overhead Transmission Line route: KEARSLEY - WHITEGATE 1 and KEARSLEY - WHITEGATE 2

	VK ROUTE: 275Kv Overhead Transmission Line route: ROCHDALE - WHITEGATE 1 and ROCHDALE - WHITEGATE 2 Whitegate Freehold and various underground cables WHITEGATE 275KV S/S WHITEGATE 33KV S/S SGT1B 132KV CABLE XLPE underground cable set SGT3 132KV CABLE XLPE underground cable set SGT4 132KV CABLE XLPE underground cable set
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A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Business and Employment Area (BEA) 3 – Greengate/Broadgate has within it various NGET assets as listed above. The site is proposed to be allocated under Policy E2 – Business and Employment Areas. Whilst it is acknowledged that the employment site is already developed, the thrust of the policy is clearly to encourage existing firms to expand and, as such, an intensification of the proposed allocation's existing employment use. With this in mind, NGET consider that the following wording, or wording to similar effect, should be included within Policy E2, which recognises the presence of assets which would need addressing as part of any new proposals:

"New development will include a strategy for responding to the NGET assets present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

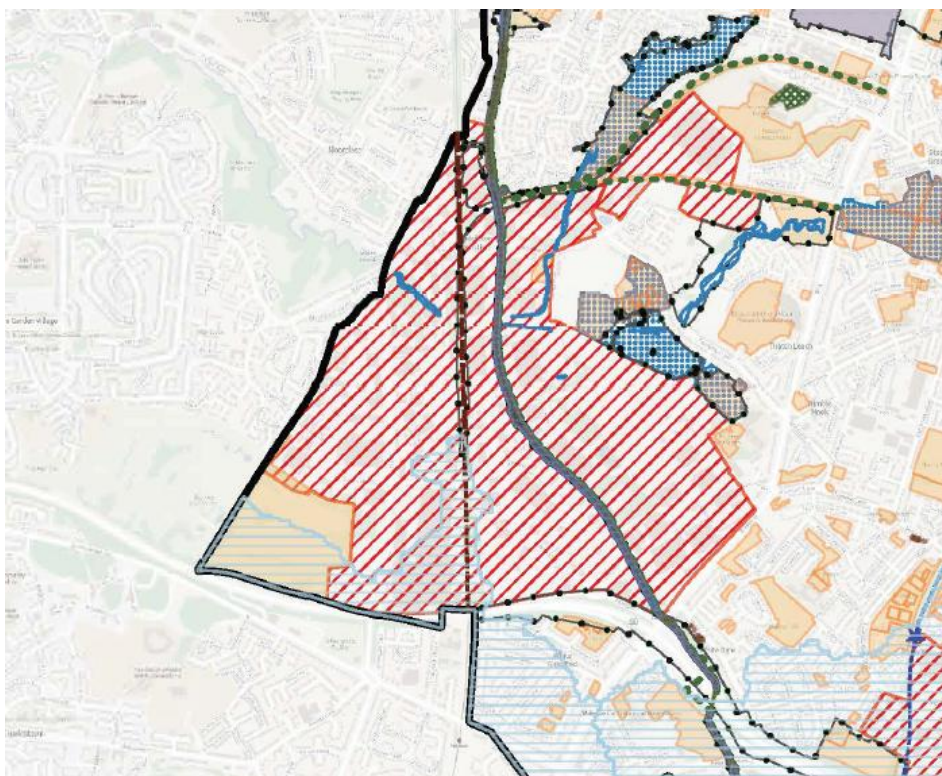


Figure 1: Business and Employment Area 3 Greengate/Broadgate

Without appropriate acknowledgement of the NGET assets present within the proposed BEA allocation, the policy should not be considered effective as it cannot necessarily be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure and we must **object** to the policy as currently drafted. We would also like to draw the Council's attention to advice contained further on in this letter, in particular around the matter of access given the presence of a strategic substation within the designation.

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, in planning for the area the Council should:

- **Safeguard all existing NGET transmission assets**, including overhead lines, underground cables and substations.
- **Support future reinforcement and expansion**, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
- **Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.**
- **Safeguard existing and potential access routes** required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
- **Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access**, unless suitable mitigation or alternative agreed routes can be secured.
- **Encourage early engagement with NGET** to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner



Fisher German LLP
The Estates Office
Ashby de la Zouch
LE65 2UZ

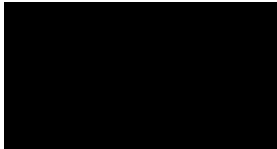
Tiffany Bates, Development Liaison Officer



National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Angela Brooks MRTPI
Partner**

For and on behalf of Fisher German LLP

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

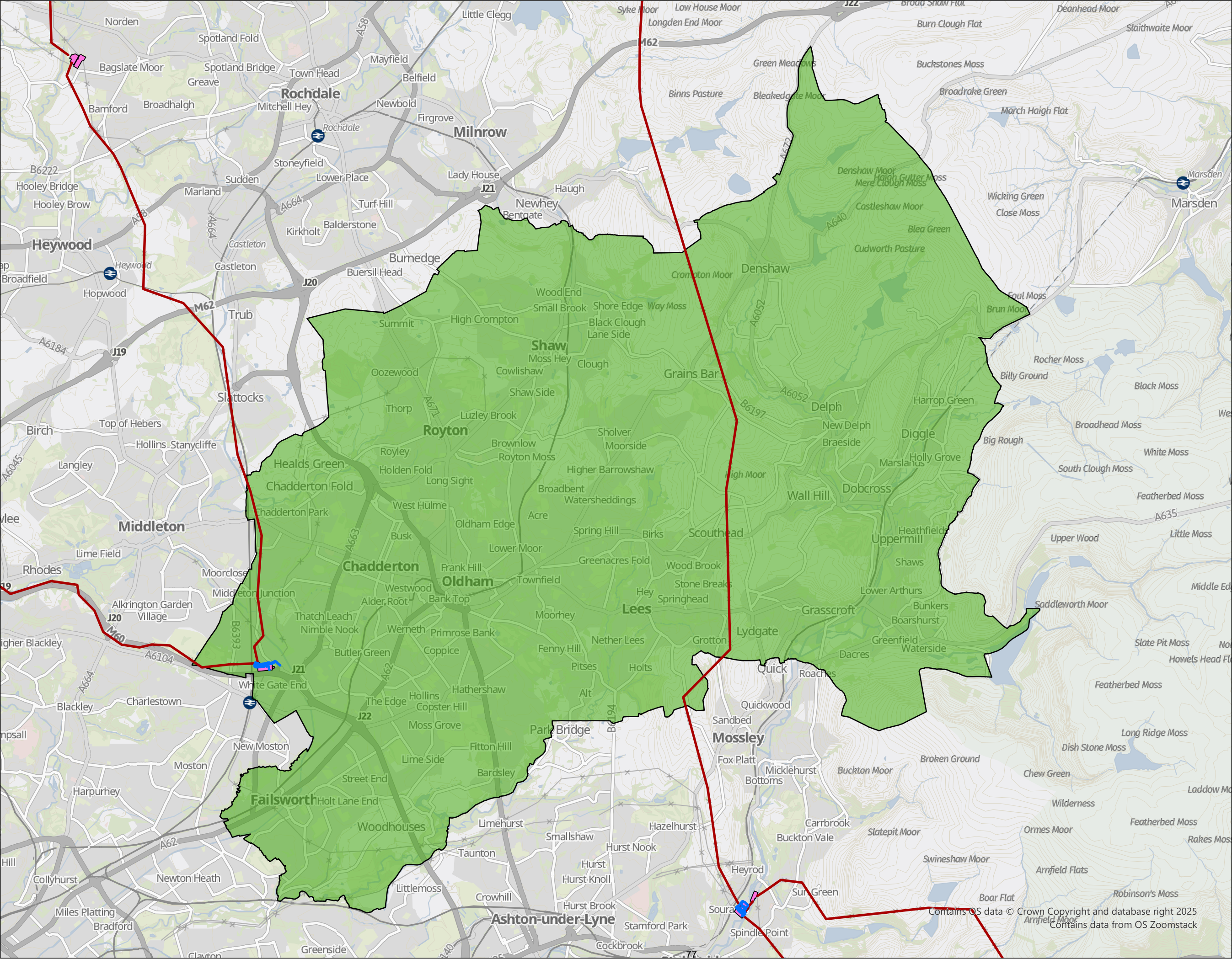
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk



00.512

Kilometers

OVERVIEW WINDOW

LEGEND:

Cable

OHL

Substation

LPA Area

REVISION: A

CLIENT: **nationalgrid**

SCHEME: PLANNING INTERACTION

TITLE: LPA ASSET INTERACTION

FP: 105181-024

SCALE: 1:59,000 @ A3

DATE: 20/05/2025

Ordnance Survey

Licensed Mapping

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fisher german

The Estates Office, Norman Court

Ashby de la Zouch,

Leicestershire, LE65 2UZ

01530 412821

fishergerman.co.uk

DRAWING REF: NG-2025-03-MT-OP-LPA- Oldham

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From: Janet Baguley [REDACTED]
Sent: 16 March 2026 10:43
To: SPI.Consultations@oldham.gov.uk
Cc: Elizabeth Dryden-Stuart; Matt Browne
Subject: Oldham Local Plan
Attachments: 540546 Natural England Response.pdf

Dear Sir/Madam,

Please find Natural England's response attached.

Kind regards

Janet Baguley
Senior Officer Strategic Planning
Cheshire, Greater Manchester, Merseyside & Lancashire Area
Natural England
2nd floor, Arndale House, Manchester Arndale
Manchester, M4 3AQ
[REDACTED]

My working days are Monday – Thursday
www.gov.uk/natural-england

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Date: 16 March 2026

Your ref: Oldham Local Plan – Regulation 19 Consultation



Oldham Council

BY EMAIL ONLY

SPI.Consultations@oldham.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

Dear Oldham Council,

PLANNING CONSULTATION: OLDHAM LOCAL PLAN - PUBLICATION PLAN

Thank you for your consultation on the above dated and received by Natural England on 03 February 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

PLACES FOR EVERYONE CONFORMITY

Natural England appreciates that changes at this stage of plan preparation should be minimal but would like to recommend that the LPA considers the following comments in relation to peat. Natural England is not purporting to set out a position regarding whether these matters relate to soundness or legal compliance, but we consider the Plan could be open to challenge in relation to conformity with Places for Everyone (PfE) on the subject of restorable, deep peat.

Policy N1 – Protecting Nature

Natural England welcome the inclusion of peat which is capable of restoration in the list of biodiversity assets that are safeguarded but we are concerned with the wording 'in line with national policy' since national policy does not explicitly refer to peat. We note that paragraph 14.20 states that peat is not currently an irreplaceable habitat. We advise that Oldham Council give weight to the [Inspectors' Report](#) on the Examination of PfE Joint Development Plan (paragraph 234) which states that *deep peat that is capable of being restored with human intervention (i.e. that which has not been "destroyed") [...] can meet the NPPF definition of an irreplaceable habitat due to its age and rarity.* We would therefore like to see explicit policy that protects deep peat from development and extraction to avoid the ambiguity of the current national planning policy and to conform with the PfE Inspector's findings.

ADDITIONAL COMMENTS

The following comments relate to matters Natural England consider would benefit from improvement but are not matters of soundness or legal compliance.

Policy N1 – Protecting Nature: Reasoned Justification

Paragraph 14.21 references the [England Peat Map](#) as an indication for peat presence at proposals. Due to some inaccuracies in the outputs of this tool in the Greater Manchester region and more widely, we also signpost the [England Peat Status Greenhouse Gas and Carbon Storage](#) dataset which indicates areas of deep peat. Natural England advise this evidence should be used as an initial tool to determine whether further hydrological and ground investigations are required. Additional sources of information include [The British Geological Survey maps portal](#) and existing borehole data from the [British Geological Survey](#).

Policy N3 - Enhancing Green Infrastructure through development

Consider the justification for Policy N3's section on the Urban Greening Factor including reference to the specific GM LNRS action [see page 69 of the [main document](#)] as further evidence for the policy approach: *Create dedicated new multifunctional and inclusive green spaces as part of new development and regeneration, to meet the national Urban Greening Factor of 0.3 on commercial and 0.4 on residential development or the local authority set Urban Greening Factor.*

Habitats Regulations Assessment

In line with our previous response (ref 463353) and given the removal of development allocations from the Plan, Natural England maintain that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured. However, we make the following technical comments on the process undertaken and terminology issues:

2. Brief description of the Plan

This section of the HRA should summarise what elements of the Local Plan go beyond those included in PfE.

6. Initial Screening Opinion

Table 6.1 would benefit from an additional line of explanatory text to support the screening decision.

Where there is likely significant effect (LSE) alone, these policies need to be taken to Appropriate Assessment (AA) alone. Where there is no LSE alone, these policies need to be assessed in combination with other plans or projects to establish if, together, they result in an LSE that needs to be considered at AA. This in-combination assessment of LSE ruled out alone should come before the AA.

7. Appropriate Assessment

With LSE being assessed in the screening process, the AA then assesses whether there is an adverse effect on integrity (AEIOI) on European designated sites. We note that in this section there are many instances where LSE is being referred to instead of AEIOI and advise that this wording should be corrected.

This stage needs to assess the identified LSEs in detail on the features of the European site, considering the site's conservation objectives. This AA doesn't look in detail at what effects each of the policies screened in could lead to and we would expect that to be clearly evaluated in this section. If sufficient evidence exists to rule out an AEIOI, this conclusion should be explicitly stated here.

Firstly, the AA must look at the potentially damaging aspects of each policy and the potential effects on the site features and conservation objectives and characterise the impacts in terms of their likelihood, nature, scale, severity and duration. This assessment needs to include a consideration of

the impacts on:

- The extent and distribution of qualifying habitats and species,
- The abundance and spatial distribution of qualifying species or assemblages,
- The structure of the qualifying habitat, which should not be affected in terms of abundance and diversity,
- The physical, chemical and biological processes that support the qualifying habitat to ensure these are not affected.

The AA must then look at any potential mitigation measures, to determine if they can reduce the likelihood, nature, scale, and duration of the effect to a lower level. The AA should seek mitigation measures that are capable of implementation and will reduce the impact to the lowest level possible. Any residual effects after applying mitigation should also be considered alone and in-combination.

Please send any new consultations, or further information on this consultation, to

[REDACTED]

Yours faithfully

Matt Browne

Sustainable Development Higher Officer
Cheshire to Lancashire Area Team
Natural England

From: Hyacynth Cabiles [REDACTED]
Sent: 26 March 2026 16:51
To: SPI Consultations
Cc: [REDACTED]
Subject: Oldham LP (Reg.19) - NHS GM ICB Response
Attachments: 2026.03.26 Oldham LP (Reg.19) - NHS GM ICB Response.pdf

Good afternoon,

Thank you for the opportunity to comment on the Oldham Local Plan Regulation 19 draft consultation.

Attached are the comments submitted by NHS Property Services on behalf of NHS Greater Manchester ICB.

If you are able to confirm receipt of our response, it would be much appreciated.

Should you have any questions on the attached, please do not hesitate to get in touch.

Kind regards
Hyacynth

Hyacynth Cabiles MRTPI | Town Planner

NHS Property Services Ltd
10 South Colonnade, Canary Wharf, E14 4PU
[REDACTED]

www.property.nhs.uk | @NHSPROPERTY

Customer Service Centre: T: 0808 196 2045 | E: customer.service@property.nhs.uk

connect.property.nhs.uk

NHS Property Services Ltd, Regent House, Heaton Lane, Stockport, Cheshire, SK4 1BS. Registered in England, No: 07888110 Disclaimer This e-mail is not intended nor shall it be taken to create any legal relations, contractual or otherwise. This e-mail and any accompanying documents are communicated in confidence. It is intended for the recipient only and may not be disclosed further without the express consent of the sender. Please be aware that all e-mails and attachments received and sent by NHS Property Services Ltd are subject to the Freedom of Information Act (2000) and may be legally required for disclosure to the public domain. NHS Property services Ltd is registered with the Information Commissioners Office and will hold and process all personal data fairly, transparently and in accordance with the law. Further information can be found on the website at <https://www.property.nhs.uk/privacy-policy/>



Greater Manchester

Strategic Planning and Information
Oldham Council
First Floor Reception
Spindles Shopping Centre
Oldham, OL1 1LA
SPI.Consultations@oldham.gov.uk



Property Services

NHS Greater Manchester
Integrated Care Board (NHS GM
ICB)

Agent's contact details:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

26 March 2026

BY EMAIL ONLY

RE: Consultation on Draft Oldham Local Plan – Regulation 19

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS) on behalf of NHS Greater Manchester Integrated Care Board (NHS GM ICB). NHS GM ICB has delegated authority from NHS England for the commissioning of primary care services (general medical services) for the entirety of the Greater Manchester area, comprising of ten Local Planning Authorities.

NHS Greater Manchester ICB

NHS GM ICB is the responsible body for making decisions about health services in the local area and operates across three different levels (neighbourhood, locality and Greater Manchester region) throughout the ten local authorities: Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan. This comprises of commissioning many of the health services that is required and used by the local population including hospital care, urgent and emergency services, GP services, community pharmacy, dentistry, mental healthcare, general ophthalmology, and various community services.

NHS GM ICB are part of the Greater Manchester Integrated Care Partnership (Greater Manchester ICP) which connects NHS GM ICB to the Greater Manchester NHS Trusts and other NHS providers across the whole of primary care. This includes working closely and collaboratively alongside the Greater Manchester Combined Authority (GMCA), the ten local authorities and partners across the Voluntary, Community, Faith, and Social Enterprise (VSCFE) sector, and the ten local Healthwatch and Trades Unions. All involved partners work collaboratively to ensure improvements towards the health, wealth and wellbeing of the rapidly growing 2.8 million residents are delivered from the region level down to the local level (towns and villages).

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding

the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Local Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.



Oldham Local Plan
Publication Plan Stage Representation Form

Ref:

**(For official
use only)**

Comments are invited until 11.59pm on Friday 27 March 2026

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

Please return this form by:

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

Alternatively, please complete the online response form via the Council's consultation platform at <https://bigoldhamconvo.oldham.gov.uk/>

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 and names will be published. Full details of how your information will be shared can be found in the Strategic Planning and Information Privacy Notice which can be found on the council's website at https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Miss	
First Name	Hyacynth	
Last Name	Cabiles	
Job Title (where relevant)	Town Planner	
Organisation (where relevant)	NHS Property Services on behalf of NHS Greater Manchester ICB	
Address Line 1	10 South Colonnade	
Line 2	Canary Wharf	
Line 3		
Line 4		
Post Code	E14 4PU	
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation: NHS Greater Manchester ICB

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

CO3

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy CO3 focuses on the provision of new community facilities and redevelopment of existing community facilities. This includes the requirement for proposals to demonstrate one of criterion (a) to (c) to justify the loss of an existing facility, which includes (b) demonstration of the loss as part of a wider proposal to improve service provision in the locality. NHS GM ICB support the inclusion of criterion (b) and supporting paragraph 18.38 as it enables the effective and timely redevelopment of existing health facilities where it has been formally declared surplus as part of wider estate strategy or transformation plan.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Name or Organisation: NHS Greater Manchester ICB

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes		No	
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy CO6 focuses on the development of new health facilities, the loss of existing health facilities and how new developments are required to address impacts on health, including healthcare infrastructure.

New Health Facilities

The Council seeks to support new health facilities in locations where there is an identified need confirmed by relevant NHS bodies and strategies, and where appropriate, this offers co-location with other community services. NHS GM ICB welcomes the inclusion for the need of new healthcare facilities to be determined by NHS bodies and strategies. Alongside GMICP, NHS Greater Manchester ICB forms part of the ICS in the Greater Manchester area and are the sole commissioning body responsible for the commissioning and planning for local healthcare facilities in Oldham. To accurately reflect the structures which exist to plan for local healthcare infrastructure, modifications are proposed below (in red italics) to make reference to NHS Greater Manchester ICB.

The Council sets the expectation for health facilities to be co-located with other community services, where appropriate. While we support the broad principle of co-location, we would urge the Council to consult NHS GM ICB to ensure the operational needs of primary healthcare facilities can be met in line with NHS standards and in considering the suitability of co-location with other community services.

Loss of Existing Health Facilities

The loss of a healthcare facility will be supported where it is formally declared surplus to the operational healthcare requirements of the NHS or as part of an estates strategy or service transformation plan. In line with our comments to Policy CO3, NHS GM ICB support the approach taken by the Council on the requirements to justify the loss of an existing health facility.

Impact of Residential Developments on Health Facilities

As drafted, the policy sets the expectation for contributions to be sought where there are significant impacts on health and wellbeing identified resulting from developments of 10 dwellings or more. NHS GM ICB support the wider principle of ensuring the impacts on health infrastructure are sufficiently assessed and mitigated through

seeking contributions for additional health infrastructure provision and would encourage the Council to engage with the ICB on a site-by-site basis.

As local health commissioners, this would enable NHS GM ICB to accurately and suitably assess and determine where there is an identified need for primary care mitigation resulting from the impact of proposed new developments.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed modification to Policy CO6:

New Health Facilities

“Proposals for new health facilities will be supported where they are:

located in areas of identified need, as evidenced by the *NHS GM Integrated Care Partnership Board (or successor body)* – Oldham Locality and relevant NHS strategies; [...]

Name or Organisation: NHS Greater Manchester ICB

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes	<input checked="" type="text"/>	No	
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy IN2 sets out the Council's requirement for new developments to contribute towards improving existing infrastructure provision, either through the delivery of new infrastructure or contributions, where there is an identified impact on existing infrastructure resulting from the new development/s. To support this, the policy further states the need for developers to engage in early discussions with the Council to discuss the required planning obligations and requirements.

NHS GM ICB support the requirement for securing the necessary contributions to ensure the timely delivery of required infrastructure and enable sustainable growth of new developments. To support this, we recommend the Council and applicants engage in early discussions with NHS GM ICB to assess the impact of new developments on existing primary healthcare service provision and to determine the most suitable form of mitigation to deliver the required primary healthcare infrastructure.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A – Recommendations on approach set out above.

Name or Organisation: NHS Greater Manchester ICB

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	Evidence Base – Infrastructure Delivery Plan (January 2026)	Policies Map	
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4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes		No	
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to the level of growth proposed by the Plan, and to ensure that planning obligations effectively support and result in capital funding towards delivery of the required infrastructure.

NHS GM ICB welcome the inclusion of a section on health infrastructure and note the Council recognises the need to collaboratively work with both the ICB and NHSPS to ensure the appropriate health infrastructure is delivered in line with anticipated housing growth. We would welcome further engagement with the Council to add further detail to the approach regarding primary healthcare provision to ensure that the assessment of existing healthcare infrastructure is robust, and the mitigation options secured align with NHS requirements.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A – Recommendations on approach set out above.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Finally, please tick 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.



Greater Manchester



Property Services

Conclusion

NHS GM ICB thank Oldham Council for the opportunity to comment on the draft Local Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHS GM ICB would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, GMICB@property.nhs.uk

Yours faithfully,

Lyn Brankin

Interim Programme Director Estates
NHS Greater Manchester ICB

Hyacinth Cabiles

Town Planner
NHS Property Services Ltd.

For and on behalf of NHS GM ICB

From: Hyacynth Cabiles [REDACTED]
Sent: 26 March 2026 16:53
To: SPI Consultations
Subject: Oldham LP (Reg.19) - NHSPS Response
Attachments: 2026.03.26 Oldham LP (Reg.19) - NHSPS Response.pdf

Good afternoon,

Thank you for the opportunity to comment on the Oldham Local Plan Regulation 19 draft consultation.

Attached are the comments submitted by NHS Property Services.

If you are able to confirm receipt of our response, it would be much appreciated.

Should you have any questions on the attached, please do not hesitate to get in touch.

Kind regards
Hyacynth

Hyacynth Cabiles MRTPI | Town Planner

NHS Property Services Ltd
10 South Colonnade, Canary Wharf, E14 4PU
[REDACTED]

www.property.nhs.uk | @NHSProperty

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Property Services

Strategic Planning and Information
Oldham Council
First Floor Reception
Spindles Shopping Centre
Oldham, OL1 1LA
SPI.Consultations@oldham.gov.uk

NHS Property Services Ltd
10 South Colonnade
Canary Wharf
London E14 4PU
town.planning@property.nhs.uk

26 March 2026

BY EMAIL ONLY

RE: Consultation on Draft Oldham Local Plan – Regulation 19

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Local Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.



Oldham Local Plan
Publication Plan Stage Representation Form

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Comments are invited until 11.59pm on Friday 27 March 2026

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Miss	
First Name	Hyacinth	
Last Name	Cabiles	
Job Title (where relevant)	Town Planner	
Organisation (where relevant)	NHS Property Services	
Address Line 1	10 South Colonnade	
Line 2	Canary Wharf	
Line 3		
Line 4		
Post Code	E14 5HS	
Telephone Number	020 7558 5555	
E-mail Address (where relevant)	h.cabiles@nhs.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation: NHS Greater Manchester ICB

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes	<input checked="" type="text"/>	No	
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy CO3 focuses on the provision of new community facilities and redevelopment of existing community facilities. This includes the requirement for proposals to demonstrate one of criterion (a) to (c) to justify the loss of an existing facility, which includes (b) demonstration of the loss as part of a wider proposal to improve service provision in the locality. NHSPS support the inclusion of criterion (b) and supporting paragraph 18.38, in line with our response at Regulation 18 stage (2024) as it enables the effective and timely redevelopment of existing health facilities where it has been formally declared surplus as part of wider estate strategy or transformation plan.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Name or Organisation: NHS Greater Manchester ICB

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes		No	
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy CO6 focuses on the development of new health facilities, the loss of existing health facilities and how new developments are required to address impacts on health, including healthcare infrastructure.

New Health Facilities

The Council seeks to support new health facilities in locations where there is an identified need confirmed by relevant NHS bodies and strategies, and where appropriate, this offers co-location with other community services. NHSPS welcomes the inclusion for the need of new healthcare facilities to be determined by NHS bodies and strategies. Alongside GMICP, NHS Greater Manchester ICB forms part of the ICS in the Greater Manchester area and are the sole commissioning body responsible for the commissioning and planning for local healthcare facilities in Oldham. To accurately reflect the structures which exist to plan for local healthcare infrastructure, modifications are proposed below (in red italics) to make reference to NHS Greater Manchester ICB.

The Council sets the expectation for health facilities to be co-located with other community services, where appropriate. While we support the broad principle of co-location, we would urge the Council to consult NHS GM ICB to ensure the operational needs of primary healthcare facilities can be met in line with NHS standards and in considering the suitability of co-location with other community services.

Loss of Existing Health Facilities

The loss of a healthcare facility will be supported where it is formally declared surplus to the operational healthcare requirements of the NHS or as part of an estates strategy or service transformation plan. In line with our comments to Policy CO3, NHSPS support the approach taken by the Council on the requirements to justify the loss of an existing health facility.

Impact of Residential Developments on Health Facilities

As drafted, the policy sets the expectation for contributions to be sought where there are significant impacts on health and wellbeing identified resulting from developments of 10 dwellings or more. NHSPS support the wider principle of ensuring the impacts on health infrastructure are sufficiently assessed and mitigated through seeking

contributions for additional health infrastructure provision and would encourage the Council to engage with the ICB on a site-by-site basis.

As local health commissioners, this would enable NHS GM ICB to accurately and suitably assess and determine where there is an identified need for primary care mitigation resulting from the impact of proposed new developments.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed modification to Policy CO6:

New Health Facilities

“Proposals for new health facilities will be supported where they are:

located in areas of identified need, as evidenced by the *NHS GM Integrated Care Partnership Board (or successor body)* – Oldham Locality and relevant NHS strategies; [...]”

Name or Organisation: NHS Greater Manchester ICB

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant	Yes		No	
2. Sound	Yes	<input checked="" type="text"/>	No	
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy IN2 sets out the Council's requirement for new developments to contribute towards improving existing infrastructure provision, either through the delivery of new infrastructure or contributions, where there is an identified impact on existing infrastructure resulting from the new development/s. To support this, the policy further states the need for developers to engage in early discussions with the Council to discuss the required planning obligations and requirements.

NHSPS support the requirement for securing the necessary contributions to ensure the timely delivery of required infrastructure and enable sustainable growth of new developments. To support this, we recommend the Council and applicants engage in early discussions with NHS GM ICB to assess the impact of new developments on existing primary healthcare service provision and to determine the most suitable form of mitigation to deliver the required primary healthcare infrastructure.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A – Recommendations on approach set out above.

Name or Organisation: NHS Greater Manchester ICB

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Evidence Base –
Infrastructure
Delivery Plan
(January 2026)

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

No

2. Sound

Yes

No

3. Complies with the Duty to Co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to the level of growth proposed by the Plan, and to ensure that planning obligations effectively support and result in capital funding towards delivery of the required infrastructure.

NHSPS welcome the inclusion of a section on health infrastructure and note the Council recognises the need to collaboratively work with both NHS GM ICB and NHSPS to ensure the appropriate health infrastructure is delivered in line with anticipated housing growth. We would welcome further engagement with the Council to add further detail to the approach regarding primary healthcare provision to ensure that the assessment of existing healthcare infrastructure is robust, and the mitigation options secured align with NHS requirements.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A – Recommendations on approach set out above.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Finally, please tick 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.

Conclusion

NHSPS thank Oldham Council for the opportunity to comment on the draft Local Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, town.planning@property.nhs.uk.

Yours faithfully,

Hyacynth Cabiles MRTPI
Town Planner

[Redacted signature]

For and on behalf of NHS Property Services Ltd

From: Alan Chorlton [REDACTED]
Sent: 26 March 2026 20:27
To: SPI Consultations
Subject: Oldham Publication Plan

Sorry. Could not navigate the consultation web site

Please take the following as the comments of Chorlton Planning Ltd. I am Alan Chorlton;

1. Tourist Economy. The tourism industry in Oldham and in particular Saddleworth brings a lot of income to the towns and villages. The tourism industry is growing and the Plan should give more weight to this. There is a need for more high quality visitor accommodation. This should not be limited to the urban areas and villages. A policy to encourage more high quality limited tourist accommodation in rural areas outside the built up areas would assist this.
2. Green Belt exceptions. The Plan proposes restricting limited infill in villages to a small gap between existing buildings. This is unnecessary and will prevent a great number of new properties that fit well in already built up settlements. This should be deleted from the plan and left the decision making to assess the situation on the ground.

Hope the above can be fed into the consultation system. Chorlton Planning Ltd email address is [REDACTED]
Kind regards. Alan Chorlton Sent from my iPad

From: The Big Oldham Convo Team [REDACTED]
Sent: 19 March 2026 16:53
To: [REDACTED]
Subject: Anonymous User completed Publication Plan Stage Representation Form

Anonymous User just submitted the survey Publication Plan Stage Representation Form with the responses below.

Title

Mr

First Name

Tom

Last Name

Clarke MRTPI

Job Title (where relevant)

National Planning Manager

Organisation (where relevant)

Theatres Trust

Address

[REDACTED]

Post Code



Email Address (where relevant)

planning@theatretrust.org.uk

To which part of the Local Plan does this representation relate?

Policy

Please provide the specific paragraph, policy, or section of the policies map you are referring to:

Policy OTC1 - Oldham Town Centre

Do you consider the Local Plan is legally compliant?

Yes

Do you consider the Local Plan is Sound?

Yes

Do you consider the Local Plan complies with the Duty to Co-operate?

Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

(If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments)

We welcome and support promotion of additional facilities for cultural and live performance venues to complement the Coliseum Theatre. These help generate additional footfall and vibrancy, supporting the

social and cultural well-being of local people as well enhancing the success of the town centre in line with the policy's objective.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 15 above:

N/A

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)
