

Oldham

Local Plan

**Oldham Local Plan: Publication Plan -
Regulation 19(1) Representations - Part 02 -
De to Ha**

August 2026



Oldham
Council

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From: Alexis De Pol [REDACTED]
Sent: 27 March 2026 15:13
To: SPI Consultations
Subject: Oldham Local Plan Publication Representation
Attachments: Representation Form.docx; Rowland Homes Representation Publication Oldham Local Plan.pdf

To whom it may concern

Please find attached a representation on behalf of Rowland Homes Ltd to the Publication Oldham Local Plan. I would be grateful if you could confirm receipt. The representation includes a plan which we can send separately if helpful.

Kind regards

Alexis

 **Alexis De Pol**
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Managing Director

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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
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Job Title (where relevant)	Strategic Land & Planning Manager	
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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

H1

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.

See objection statement attached to this form.

(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.

See objection statement attached to this form.

(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)

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:

It is considered necessary for the representative to participate in the hearing sessions in order to clarify and elaborate on the matters raised in the written representation. Attendance would enable the representative to respond directly to any questions the Inspector may have regarding the concerns identified in relation to Policy H1, the supporting evidence, and the modifications sought. Participation would assist the Inspector in fully understanding the reasoning and implications behind the proposed changes.

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.



DE POL

CHARTERED TOWN PLANNERS

established 1980

**Oldham Local Plan Publication
Draft (Regulation 19)**

**Representation on behalf of Rowland
Homes Ltd**



Oldham Local Plan Publication Draft (Regulation 19)

Representation on behalf of Rowland Homes Ltd

Date:

March 2026



Chapter 1

Introduction

1.1. De Pol Associates Ltd are retained by Rowland Homes to submit a representation to the Publication (Regulation 19) draft of the Oldham Local Plan (OLP) and specifically to object to Policy H1 'Delivering a Diverse and Sustainable Housing Offer' with regards to:

- The requirement that all residential development achieve Greater Manchester Accessibility Level (GMAL) 4 or above.
- The lack housing allocations within the policy/Plan other than the strategic sites already allocated in Places for Everyone (PfE) and the resulting reliance on windfall sites coming forward within the urban area to meet the minimum housing requirement. It is considered that the Council's own submitted evidence base demonstrates that this strategy is unlikely to ensure that sufficient land comes forward to deliver the minimum housing requirement over the plan period and fails to meet the national policy objective to significantly boost the supply of housing.
- The Policy / Plan fails to meet the National Planning Policy Framework (NPPF) requirement to identify specific, deliverable sites for five years following the intended date of adoption and for subsequent years 6-10.

1.2. As expanded upon in this representation it is considered that for the OLP to meet the NPPF requirement of being positively prepared, justified, effective and consistent with national policy, which is a pre-requisite to meeting the test of soundness, it needs to include sufficient housing allocations to ensure that the minimum housing requirement can be met. Furthermore, it is considered that this is likely to require further Green Belt release above that which has already occurred in PfE. This representation includes a Green Belt site which is considered to represent a suitable site for Green Belt release and allocation for housing development.



1.3. The latest revision of the National Planning Policy Framework (NPPF) was published in December 2024 and updated in February 2025. However, under the transitional arrangements set out in its paragraphs 234 and 235, for the purpose of preparing Local Plans where a plan includes policies to deliver the level of housing and other development set out in a preceding local plan adopted since 12 March 2020 the plan will be examined under the relevant previous version of the Framework. As the housing requirement for the OLP is set by PfE, which was adopted in March 2024, the OLP is to be examined against the previous version of the NPPF published in December 2023. As such, for the purposes of this representation unless otherwise stated reference to the NPPF or NPPF23 means the December 2023 version. In some instances, this representation still refers to the latest NPPF revision and subsequent update, which is referred to as NPPF24.

1.4. The remainder of this representation to Policy H1 is set out as follows:

Chapter 2: Greater Manchester Accessibility Level (GMAL)

Chapter 3: Housing requirement and need to demonstrate deliverable supply

Chapter 4: Five Year Housing Supply

Chapter 5: Housing supply over plan period

Chapter 6: Modifications to make the plan sound



Chapter 2

Greater Manchester Accessibility Level

- 2.1. 2.1. Policy H1 states that the Council will support residential development proposals that are in sustainable and accessible locations and promote and encourage use of public transport, walking, wheeling, and cycling. It states that all residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL) 4 or above.
- 2.2. Appendix 1 of the Council's Housing Topic Paper identifies the GMAL score for the sites in the SHLAA, other than those sites where development is already under construction. It is noted that of those sites identified in Appendix 1 as having extant planning permission, 34 have GMAL scores of 3 or under and the PfE allocated strategic sites totalling over 2,200 dwellings are also primarily identified as having GMAL scores of 3 and under. These are all sites which were clearly considered to be in sufficiently sustainable and accessible locations for residential development despite not having GMAL scores of 4 and above.
- 2.3. Moreover, Housing Topic Paper Appendix 1 includes windfall sites without planning permission and within this category sites identified as having GMAL scores of 3 or under contribute 1,442 dwellings towards the suggested supply over the OLP plan period. This equates to just under 34% of the identified supply from this source. Given that the OLP housing strategy is reliant on these windfall sites coming forward to meet the minimum housing requirement, the need in Policy H1 for all proposed residential development to have a GMAL score of 4 or above appears somewhat restrictive.



Chapter 3

Housing Requirement and Need to Demonstrate Deliverable Supply

- 3.1. National Planning Policy Framework (NPPF) paragraph 60 states that to support the Government's objective of significantly boosting the supply of homes it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. That the overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community. Paragraph 61 states that to determine the minimum number of homes needed strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.
- 3.2. The Government's standard method was revised in December 2024 and based on the revised standard method the Local Housing Need (LHN) in Oldham is 910 dwellings per annum (dpa). However, Oldham is one of the Greater Manchester Authorities covered by Places For Everyone (PfE) 2022-2039, which was adopted in March 2024 prior to the revised standard method. As the Oldham Local Plan (OLP) is a Part 2 Plan falling under the strategic PfE Plan the housing requirement is already set by PfE. This is despite it being significantly lower than the LHN based on the standard method. In this respect the minimum housing requirement for Oldham, as set by PfE Policy JP-H1 is 11,560 dwellings over the 2022-2039 plan period, averaging 680 dpa. This is approximately 73% of the LHN based on the new standard method. Policy JP-H1 also steps the housing requirement for Oldham as follows: 404dpa between 2022-2025, 680 dpa between 2025-2030 and 772 dpa between 2030-2039.
- 3.3. In addition to setting the minimum housing requirement PfE also released Green Belt land for strategic housing allocation. However, and as confirmed in its Foreword, PfE does not cover everything that a local plan would and individual districts need to take forward Local Plans to set out more detailed policies, including both strategic and non-strategic policies. This includes setting out detailed policies identifying how the minimum housing requirement set out in PfE



is to be met, with NPPF paragraph 69 stating that planning policies should identify a sufficient supply and mix of sites. That they should identify a supply of:

- specific, deliverable sites for five years following the intended date of adoption with an appropriate buffer; and
- specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the plan.

- 3.4. As expanded upon below, it is considered that the OLP fails to meet these NPPF paragraph 69 requirements. Moreover, the strategy of the OLP to rely on the PfE strategic housing allocations and windfall sites without any other identified housing allocations does not meet the overriding objective of NPPF paragraph 60 to significantly boost the supply of homes and ensure a sufficient amount and variety of land can come forward where it is needed.
- 3.5. The Council's January 2026 Housing Topic Paper states in paragraph 3.55 that based on NPPF paragraph 76 local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if a) their adopted plan is less than five years old; and b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded. It goes on to state that at the time of anticipated adoption PfE will still be less than five years old and it identified a five year supply of specific deliverable sites.
- 3.6. Firstly, paragraph 76 of NPPF23 relates to decision making not Local Plan preparation. With regards to Local Plan preparation NPPF23 paragraph 69 requires planning policies to identify a sufficient supply of specific, deliverable sites, taking into account their availability, suitability and likely economic viability, for the five years following the intended date of adoption.
- 3.7. Secondly, PfE does not set out to identify a sufficient supply of specific, deliverable sites for each authority to the extent that it removes the requirement for their Local Plans to comply with NPPF paragraph 69. PfE confirms that it does not cover everything that a local plan would and that individual districts need to take forward Local Plans to set out more detailed policies, including both strategic and non-strategic policies. PfE contains strategic housing allocations and Table 7.1 'Sources of housing and supply 2022-2039' forms part of the reasoned



justification for Policy JP-H1 in so far as it summarises the supply from these strategic allocations and the supply identified in each district's strategic housing land availability assessments, along with allowances for windfalls and demolitions. However, the PfE Inspector's report confirms in paragraph 790 that other than the supply from the strategic allocations the other sources of supply identified in Table 7.1, amounting to a total of around 170,000 dwellings across the Greater Manchester Authorities, are not proposals in the Plan but rather existing commitments and potential opportunities that will be considered by individual local planning authorities through their local plans. Paragraph 161 of the report also states that it was not necessary for the Inspectors to consider the detailed content of the SHLAAs as that is a matter for individual local plans.

- 3.8. Thirdly, whilst the NPPF24 transitional arrangements state that the preparation of the OLP is to be examined against the policies of NPPF23 this is not the case for decision making purposes. It is also relevant to note that the updated NPPF24 no longer contains the provisions in NPPF23 paragraph 76 which precludes local authorities from having to demonstrate a deliverable five year housing supply for the first five years following adoption. Furthermore, under the terms of paragraph 78 of NPPF24, on 21st March 2029, which is the fifth anniversary of PfE, the Council will have to maintain a deliverable five year housing supply based on the much higher LHN using on the revised standard method. This date is just two years after the Council's anticipated adoption of the OLP. It is also considered that PfE Policy JP-H1 acknowledges such a scenario in so far as it states:

"Where national policy requires a local planning authority to identify and update annually a supply of specific deliverable sites in their district, this will be assessed against the minimum delivery rates for the district set out in Table 7.2, irrespective of any shortfalls or surpluses in other districts and in the Plan area overall (unless national policy requires a different figure to be used)" [my emphasis].

- 3.9. In summary, for the OLP to be considered sound under NPPF paragraph 35 its policies must be consistent with the NPPF and this includes meeting the NPPF23 paragraph 69 requirement to identify a sufficient supply of specific, deliverable sites for the five years following the intended date of adoption and for subsequent years 6-10. It must also clearly be able to deliver the minimum housing requirement set by PfE and with sufficient flexibility to ensure that a choice and variety of land can come forward where it is needed. In so doing it is relevant to take into



account that from March 2029 the Council will need to maintain a five years supply of deliverable sites based on the much higher LHN using the updated standard method. As set out in Chapters 4 and 5 of this representation this is not the case and consequently the OLP is not only inconsistent with national policy but it is not positively prepared or justified.

Chapter 4

Five Year Housing Supply

4.1. OLP Policy H1 identifies the minimum housing requirement over the plan period as set by PfE but does not propose any housing allocations to meet this requirement beyond the strategic housing allocations identified in PfE. The OLP strategy is to rely on existing commitments and windfall residential development in sustainable and accessible locations. In terms of satisfying NPPF paragraph 69 the justification text to the policy states in paragraph 8.7 that the Strategic Housing Land Availability Assessment (SHLAA) and Brownfield Register provide details of sites considered suitable, available, and achievable for residential development, and should be used as a starting point to identify potential development sites. The Housing Topic Paper states in paragraphs 3.52 to 3.53 that its Appendix 1 contains more detailed information demonstrating the deliverability of the housing land supply, especially in relation to the five year period post adoption.

4.2. This Appendix 1 anticipates the OLP adoption in 2027/28 with the five year period running to 2031/32. Based on the stepped annual housing requirement set out in PfE and OLP Policy H1, the minimum housing requirement over this five year period is 3,584 dwellings (excluding a buffer). Over this period the identified supply in Appendix 1 of the Housing Topic Paper totals 5,370 dwellings and based on the details provided in this Appendix 1 the identified supply can be categorised as follows:

i)	Sites under construction	733 dwellings
ii)	Sites with extant permission	2,039 dwellings
iii)	PfE allocated sites without planning permission	1,181 dwellings
iv)	Windfall sites with a live planning application	462 dwellings
v)	Windfall sites not subject to any planning applications	955 dwellings

4.3. The requirement in NPPF paragraph 69 is for a demonstrable five year supply of 'deliverable' sites and the NPPF definition of deliverable is:



“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

4.4. It is considered that a significant proportion of the Council’s identified five year supply in Appendix 1 does not meet this definition of deliverable and thus cannot be relied upon to satisfy the NPPF paragraph 69 requirement. This includes, but is not limited to:

- All 955 dwellings in category v) ‘Windfall sites not subject to any planning applications’
- At least 816 dwellings in category iii) ‘PfE allocations without permission’
- 29 dwellings from identified stalled sites in category ii) ‘Sites with extant permission’.

4.5. This alone brings the identified supply down to 3,570 dwellings, which is below the minimum requirement required to demonstrate a sufficient supply of deliverable sites for the five years following the intended date of adoption. However, it is considered that in the SHLAA and Housing Topic Paper the Council have also failed to provide clear evidence that even the sites with extant permission in category ii) will deliver the amount of housing suggested within this five year period, which further reduces the supply. This is explained upon below.

Category v) ‘Windfall sites with no live applications’

4.6. Housing Topic Paper Appendix 1 includes sites which based on the details in Appendix 1 have no planning permission, are not allocated or proposed for allocation, and are not subject to a live planning application. These sites range in size between 2 and 150 dwellings and contribute



955 dwellings to the identified five year supply. To be classed as deliverable the onus is on the Council to provide clear evidence that these sites are available now, offer a suitable location for development now, and will deliver housing within the five year period. For the reasons highlighted below, clear evidence not been provided to this effect:

- 17 sites totalling 156 dwellings are identified in the Appendix 1 as having a history of unimplemented planning permissions which have expired. The Council themselves acknowledge at various points in Appendix 1 that these unimplemented permissions indicate possible viability issues. The Council has not provided any evidence to explain why these sites were not brought forward previously, with permissions allowed to expire, and why despite no applications having subsequently been submitted the sites should be considered likely to be developed in the five year period. These sites are HLA2785, HLA2118, HLA2207, HLA2358, HLA2452, HLA2819, HLA2835, HLA2923, HLA2984, HLA3051, HLA3147, HLA3257, HLA3277, HLA3335, HLA3384, HLA3442 and HLA3696.
- Sites SHA1033 and SHA1801 totalling 158 dwellings are identified in Appendix 1 as requiring the loss of open space which will need to be considered as part of a planning application in line with planning policy. It is noted that these two sites are designated in the OLP as 'Open Space' subject to restrictive policies which only permit development in certain circumstances. Until such time as this matter is assessed as part of a planning application it cannot be concluded that these two sites offer a suitable location for development now.
- Site SHA1735 for 105 dwellings is identified in Appendix 1 as a large mill site which often has 'viability concerns' whilst site HLA2351 for 18 dwellings was recently refused planning permission. This raises questions as to whether these sites are suitable and achievable with a realistic prospect that housing will be delivered within the five year period.
- Site SHA0164 for 14 dwellings is identified in Appendix 1 as having been granted permission for a single HMO which indicates it is not a site likely to be developed for 14 homes as suggested in the Appendix.
- Sites totalling 212 dwellings not only have no planning permission and no pending applications but Appendix 1 states under the heading 'Developer Interest' that developer



interest is “*Not known*”. Consequently, there is no clear evidence that housing completions will begin on these sites within the five year period. These are sites HLA0076, HLA0178, SHA0079, SHA0098, SHA0901, SHA1372, SHA1858, SHA2127, SHA2157, SHA2158, SHA2160 and SHA 2166.

- The remaining sites in this category, totalling 292 dwellings, have no planning permission and no pending applications but are referred to as sites where there is known developer interest. Simply suggesting there is known interest does not comprise clear evidence that housing completions will begin on the sites within the five year period. Indeed one of these sites is SHA1735 ‘Ram Mill’ for 105 dwellings yet in February 2026 was granted planning permission to change the use of the building to create a Class C1 hotel comprising 75 double bedrooms and 105 hotel aparthotel units (ref. OUT/355327/25).

- 4.7. In summary, the LPA have failed to provide clear evidence that the sites in this category are available now, offer a suitable location for development now, and are achievable with clear evidence that housing will be delivered on the site within five years. They do not therefore meet the NPPF definition of being deliverable and all 955 dwellings from these sites should be removed from the supply.

Category iii) ‘PfE’ allocations without permission

- 4.8. Without consideration to other PfE sites, it is considered that the Council have failed to provide clear evidence to justify the suggested delivery rates set out in Appendix 1 with respect to the following PfE sites.
- 4.9. JPA10 ‘Beal Valley’ and JPA12 ‘Broadbent Moss’ are two strategic allocations which lie adjacent to one another and together extend to approximately 132ha. Appendix 1 of the Topic Paper suggests that site JPA10 ‘Beal Valley’ has a capacity of 428 dwellings, of which 342 would be delivered within the five year period. It suggests that site JPA12 ‘Broadbent Moss’ has an identified capacity of 1,451 dwellings, with 562 dwellings to be delivered within the five year period. It also states that site SHA0905 is part of allocation JPA12 and has a capacity of 86 dwellings with 44 included in the five year supply. This is a combined total of 1,965 dwellings, of which 948 contribute towards the five year supply.

- 4.10. PfE requires development of these strategic allocations to be in accordance with a comprehensive masterplan and design code which is to include the need for an infrastructure phasing and delivery strategy. The Council's web site confirms that a draft Masterplan and Spatial Design Code covering both strategic sites was published for consultation in February 2026, which runs to 30 March 2026, after which the responses are to be considered and necessary amendments made before it is formally adopted by the Council. This draft Masterplan confirms under the heading 'infrastructure and development' on page 92 that whilst some parts of the site are connected to existing infrastructure and can be brought forward more quickly, most of the new homes to the east of the Metrolink line will be dependent on the implementation of major highway schemes and new public transport facilities and will involve extensive re-modelling of land. That the package of infrastructure works is extensive and complex, and it will the need to be carefully planned with a phased approach to development. In this respect 8 development phases are identified, and Table 8.1 in the Masterplan (copied below) sets out an anticipated timeframe for delivery of housing based on these phases.

Table 8.1 'Phase delivery of homes' in the Masterplan suggests the following delivery:

Phase	Yr 1 2026	Yr 2 2027	Yr 3 2028	Yr 4 2029	Yr 5 2030	Yr 6 2031	Yr 7 2032	Yr 8 2033	Yr 9 2034	Yr 10 2035	Yr 11 2036	Yr 12 2037	Yr 13 2038	Yr 14 2039	Yr 15 2040
Phase 1	75	80	40	40	40	41									
Phase 2			40	50	50	50	45								
Phase 3															
Phase 4															
Phase 5						30	35	70	70	36					
Phase 6									70	70	70	70	19		
Phase 7												70	70	70	69
Phase 8			40			40			40			40			26
Cumulative Total	75	155	275	365	455	616	701	816	996	1102	1172	1352	1441	1511	1606

- 4.11. This suggested delivery in the Masterplan undermines the suggestion in the Housing Topic Paper Appendix 1 that these strategic PfE allocations will deliver 948 dwellings in the first five years following adoption of the Local Plan (2027/28 – 2031/32). In this respect the above Masterplan anticipated delivery only suggests a total of 616 dwellings coming forward by the end the first five year period post OLP adoption, i.e. by 2031/32 (year 6 in table 8.1 above). Moreover, this Masterplan trajectory is itself somewhat unrealistic given that it shows Phase 1 starting to deliver housing in 2026 despite the planning application for this phase having only been validated in January 2026. It is also noted that the application submissions suggest that even if a sale goes through within one month of permission being granted and construction starts immediately on that date, the first dwellings within this phase would not be completed



until 9 months after the start on site. Given that planning permission first needs to be granted, which is likely to require an extensive s.106 Agreement, and relevant conditions will also need to be discharged, it is unlikely that housing will be delivered on this phase 1 until 2028/29 at the earliest. There are no applications understood to be submitted in relation to the remaining phases, which also require significant infrastructure and ground works before housing is likely to come forward. On this basis if the above timetable is assumed to have slipped by two years the total delivery by the end of the five year period post OLP adopted will be 365 dwellings, which is 583 less than what is suggested in the Housing Topic Paper Appendix 1. However, it is considered that the delivery within the five year period could be even less.

- 4.12. JPA13 – Chew Brook Vale is identified in Housing Topic Paper Appendix 1 as delivering 100 dwellings in the five year period. PfE requires this site to be developed in accordance with a comprehensive masterplan and design code agreed by the local planning authority, which will need to include the need for an infrastructure phasing and delivery strategy. In this respect it is a mixed use strategic allocation including commercial, leisure and retail facilities as well as multi-functional green and blue infrastructure, footpath networks and recreational routes. It is required to deliver new and improved sustainable transport and highway infrastructure, extensive biodiversity enhancement and a comprehensive drainage strategy and maintenance plan for the whole site as part of the more detailed master planning stage. Paragraph 11.193 of PfE also states:

“The site comprises the redundant Robert Fletchers mill complex, which is brownfield land. Given the previous use of the Robert Fletchers site as a paper mill, and its subsequent dereliction, it is considered that the need for remediation will be high contributing to higher viability costs in preparing the site for development.”

- 4.13. The Housing Topic Paper also states in Appendix 1 that the site “May have viability issues relating to remediation given the site is a brownfield site which has been used for industry in the past...”
- 4.14. Whilst this site is a PfE allocation, to meet the NPPF definition of being deliverable for the purposes of NPPF paragraph 89 the Council must still provide clear evidence that housing completions will begin on the site within the five year period and the anticipated amount of housing likely to be delivered over this period. Given the apparent absence of the required



masterplan, no planning application being submitted and apparent contamination issues which will require remediation, together with other likely significant infrastructure requirements prior to dwellings being delivered on site, insufficient evidence has been provided for this site to be deemed deliverable within the five year period.

- 4.15. PfE allocation JPA15 'Land to the south of Coal Pit Lane' and site HLA2451, which the Housing Topic Paper confirms forms part of this strategic allocation, are together identified as contributing 53 dwellings to the five year supply. Whilst this is a PfE strategic allocation, to meet the NPPF definition of being deliverable for the purposes of NPPF paragraph 69 the Council must still provide clear evidence that housing completions will begin on the site within the five year period. Housing Topic Paper Appendix 1 does not identify any planning application having been submitted and under the heading 'Development Interest' states "Not known". Without any clear evidence that these sites will deliver housing within the five year period the suggested contribution of 42 dwellings from JPA15 and the 11 dwellings from HLA2451 should be removed from the supply.
- 4.16. JPA14 – Cowlshaw. Appendix 1 of the Housing Topic Paper suggests that this site will deliver 80 dwellings in the 5YHS but the only evidence to this effect is a reference to an application being expected soon.
- 4.17. As such at least 816 dwellings from these PfE strategic allocations should be removed from the five year housing supply.

Category ii) 'Sites with extant permission'.

- 4.18. NPPF confirms that sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years. Two sites within the five year supply totalling 29 dwellings (HLA2357 and HLA2935) are identified in the Housing Topic Paper Appendix 1 as sites where development commenced but has 'stalled'. The Housing Topic Paper confirms in paragraph 3.31 that this means a material start on site has been made but there has been no development activity for at least five years. Without any clear evidence to demonstrate that these stalled sites are due to recommence they should be removed from the supply.



- 4.19. Furthermore, under the NPPF definition of deliverable Council's still have to provide clear evidence that major sites with outline permission will deliver housing within the five year period and that suggested delivery rates and start times are realistic. Appendix 1 does not provide much evidence in relation to the sites with extant permission and for at least one of these sites the permission is understood to have now expired (site HLA3595). Furthermore, this category includes sites such as SHA2000 'Civic Centre' which is a redevelopment of brownfield land for 838 homes, with 407 included within the five year supply. The planning permission referred to in Appendix 1 (OUT/354338/25) was granted July 2025 and was a hybrid application for the demolition of the existing buildings and redevelopment for residential, commercial, business and service uses. The full permission element was for an apartment block of 93 homes, with outline permission granted for the remainder of the site where all matters other than the primary access have been reserved. It is noted that condition 7 on the decision notice allows 15 years from the date of permission to submit reserved matters approval for the outline element, implying an anticipated long phasing element to the scheme. There is also a requirement for demolition and site clearance following which conditions 16 and 17 require a site investigation and assessment into landfill gas risk, ground contamination and risks posed by past coal mining activity. In light of this, and the fact that only 93 dwellings are included in the first phase which has full permission, the Council have not provided clear evidence to justify the inclusion of 407 dwellings within the five year period. This is just one of the sites with extant planning permission and consideration has not been given to any of the other sites.
- 4.20. In summary, it is not considered that the Council have provided clear evidence of specific, deliverable sites for five years following the intended date of adoption with an appropriate buffer, as is required by NPPF paragraph 69.



Chapter 5

Housing Supply for Plan Period

- 5.1. In addition to identifying a specific supply of deliverable sites for the first five years after adoption NPPF paragraph 69 also requires planning policies to identify specific developable sites or broad locations for growth for the subsequent years 6-10, which in this instance would cover the remaining plan period to 2039. Furthermore, for the OLP to be deemed sound it must be positively prepared and provide a strategy which, as a minimum, will enable the minimum PfE housing requirement to be delivered over the plan period.
- 5.2. The Housing Topic Paper states that there were 1,401 net completions between the start of the plan period and 31st March 2025, leaving a residual requirement of at least 10,159 dwellings over the remaining plan period to 2039 based on the minimum PfE housing requirement. As previously highlighted, other than the PfE strategic allocations the strategy of the OLP is to not allocate any housing sites, with a reliance on windfall housing coming forward.
- 5.3. The 1st April 2025 SHLAA published in December 2025 and the Housing Topic Paper suggests that the SHLAA sites together with a small site allowances indicates a supply of 12,342 dwellings between 2025 and the end of the plan period. The Housing Topic Paper implies that this surplus above the minimum housing requirement means specific housing allocations are not necessary and the NPPF paragraph 69 requirement to identify a specific supply of deliverable sites is met. Contrary the Council's suggestion, it is considered that the SHLAA and Topic Paper Appendix 1 demonstrate the lack of realistically available housing opportunities within the Borough to meet the minimum PfE housing requirement, let alone enable the Council to maintain a deliverable five year housing supply based on the higher LHN using the updated standard method from March 2029.
- 5.4. Firstly, the SHLAA itself confirms that 514 dwellings in the identified supply are on sites with lapsed planning permissions or stalled sites. Some of the sites with lapsed consent, such as land at Ward Lane, Diggle, go back 10 years with no evidence of further planning permissions. As to stalled sites these are defined in the Housing Topic Paper as sites where there has been a start on site but no development activity within the last five years. This suggests that there are



inherent problems with these sites and they cannot reasonably be relied on to deliver homes. Furthermore, based on the updated Housing Topic Paper Appendix 1 the number of sites with expired permission or which are lapsed has now increased to 552 dwellings.

- 5.5. Secondly, the SHLAA suggests that 2,229 dwellings will come forward from the PfE strategic housing allocations, with Appendix 1 of the Housing Topic Paper confirming that this includes strategic allocations JPA10 and JPA12 (the latter including SHA0905), which it identifies as having a total capacity of 2,019 dwellings, with 1,748 dwellings coming forward during the plan period. As previously highlighted PfE requires the development of these strategic sites to comply with a comprehensive Masterplan and the draft masterplan is currently going through a consultation period. However, based on the phasing timetable set out in table 8.1 of the Masterplan (which is copied earlier this representation), once the aforementioned two year slippage is accounted for these two strategic sites will only deliver 1,172 dwellings over the plan period. This is 576 dwellings less than what is suggested in the SHLAA / Housing Topic Paper.
- 5.6. Thirdly, the SHLAA suggests that 253 dwellings will come forward from saved UDP Phase 1 and Phase 2 housing allocations. However, the SHLAA confirms that other than one site for 21 homes the remainder have no planning permissions and give that these are longstanding allocations in adopted Plans it suggests inherent problems. Indeed the SHLAA states that one of these sites is in active employment use. Consequently there are clear concerns as to whether 232 of these dwellings are likely to come forward.
- 5.7. Fourthly, the SHLAA suggests 5,737 dwellings will come from other windfall sites. There is no evidence to support this level of windfall development and moreover the sites included in this identified windfall supply include:
- Sites which have been granted permission for non-residential uses or are sites with an existing occupier, raising significant questions as to whether these are available and likely to come forward in the plan period for housing. This includes the following sites totaling 683 dwellings : SHA0060, SHA1332, SHA0112, SHA2032, SHA0893, SHA1314 and SHA0164.
 - Sites which are subject to open space designations in the OLP which are subject to restrictive policies, meaning these may not even be suitable for housing development. For example, sites SHA0960, SHA1033, SHA1120 and SHA1801 which total 178 dwellings.



- Site which Appendix 1 of the Housing topic Paper itself identifies as having viability / contamination constraints, such as SHA1331, SHA1683 and SHA1735 totaling 407 dwellings.
- Other sites which have been identified in the SHLAA as potential housing opportunities for a number of years but have never come forward for residential development, indicating inherent problems with the sites. An example of this is SHA1029 Kaskenmoor School for 147 dwellings which was first added to the 2012 SHLAA after the School closed in 2010.

- 5.8. The removal of these sites alone would reduce the total identified supply to 9,567 dwellings, well below the minimum residual housing requirement over the plan period. This is also without taking account the fact that 1,442 dwellings in the SHLAA supply are on sites without permission or allocation which have a GMAL score of less than 4, which is relevant if the Policy H1 requirement for all proposed residential development to have a GMAL score of 4 or above is retained. Ultimately inclusion within the SHLAA does not mean planning permission would be granted even if an application were submitted.
- 5.9. Consequently, the Council's own evidence in the SHLAA and Housing Topic Paper indicates that there are insufficient realistically available, suitable and deliverable sites within the urban area to support the OLP strategy of relying on windfall sites to deliver the minimum PfE housing requirement and to maintain a deliverable five year housing supply. This is without even allowing for the fact that from March 2029 the Council will have to maintain a five year supply of sites based on the much higher LHN using the updated standard method.



Chapter 6

Suggested Modifications

- 6.1. The NPPF requires plans to be justified by proportionate and robust evidence and to represent the most appropriate strategy when considered against reasonable alternatives. For reasons already highlighted, it is considered that the Plan is not based on realistic assumptions regarding site availability and development viability and that the Council have failed to provide a robust evidential basis to justify the Policy H1 strategy of relying on just the PfE allocations and windfall sites to deliver the minimum PfE housing requirement. The Council has not demonstrated why a strategy based on allocating additional specific sites was not pursued, especially given the lack of clear evidence in the SHLAA that the strategy of windfall reliance will be able to deliver the minimum requirement over the plan period or enable the Council to maintain a deliverable 5YHS. It is not considered to be positively prepared, justified, effective or consistent with national policy as a result.
- 6.2. Given that the SHLAA does not identify a clear, deliverable, and evidence-based housing supply realistically capable, and sufficiently flexible, to deliver the minimum housing requirement, it is considered necessary for the OLP to allocate specific deliverable housing sites. This should also include a spatially coherent strategy that identifies sites capable of contributing to a demonstrable five-year housing land supply from the point of adoption.
- 6.3. The PfE strategic allocations included removal of land from the Green Belt and the PfE Inspectors' report of 14 February 2024 states in paragraph 163 that the available evidence clearly indicates that the existing land supply assumed in the submitted Plan would fail to provide opportunities for local plans to identify a sufficient supply and mix of sites, taking account of availability, suitability and viability, to ensure that the need for new market and affordable homes is met in accordance with the spatial strategy. This was considered to represent sufficient justification for removing land from the Green Belt based on NPPF23.
- 6.4. It is also noted that paragraph 161 states that it was not necessary for the Inspectors to consider the detailed content of the SHLAAs as that is a matter for individual local plans. Consequently, it is the examination of the OLP where detailed consideration of the SHLAA's housing supply for Oldham is relevant and necessary. If this does not robustly demonstrate that the supply in the



SHLAA can realistically meet the minimum housing requirement over the plan period then PfE has already established that further Green Belt release is justified. For reasons set out in this statement the Council's SHLAA is unable to robustly and clearly identify sufficient suitable, available and deliverable land to meet the minimum housing requirement and thus further Green Belt release is considered necessary and justified as part of the OLP.

- 6.5. If further Green Belt release is to be considered the following site to the south of Old Thornham Road on the northern edge of Royton would be appropriate for housing allocation.
- 6.6. This site comprise land to the south of Old Thornham Road on the edge of Royton as shown edged in red in Fig 1 below. It is a greenfield site enclosed by the urban area to the south and east, to the rear of existing housing running along both site boundaries which face the A671 to the east and Tandle Hill Road to the south. There is also housing to the northeast corner of the site either side of Thornham Old Road.
- 6.7. The site is closely situated to a main transport corridor between Rochdale and Oldham and is well-related to existing services, facilities, and public transport provision. This includes being approximately 1.8km walking distance from the designated Royton Centre which includes supermarkets, pharmacy, health centre, shops, libraries etc, although the site is also within twenty-minute walking distances of two primary schools, a church, a secondary school, post office, a cricket club, public houses, parks, early-years nurseries, and recreational facilities. There are also two bus stops within walking distance which run regular services to Rochdale and Oldham town centres, as well as Royton Centre.
- 6.8. The site is also available for development and is being promoted by established regional house builder Rowland Homes, who consider the site capable of early delivery within the plan period. Although survey work and assessments are still on going there are no known technical constraints which would preclude the principle of a residential development of the site.



Fig 1: Land south of Thornham Old Road

- 6.9. Whilst the site is located outside the defined urban area of Royton and within the Green Belt, it would represent a logical rounding-off of the urban area and as highlighted below does not significantly contribute to the five purposes of the Green Belt as set out in NPPF23 paragraph 143.

a) To check the unrestricted sprawl of large built-up areas.

- 6.10. Planning Practice Guidance (PPG) states in paragraph: 005 Reference ID: 64-005-20250225 that for a site to strongly contribute to this purpose it would need to lack any physical features in



reasonable proximity that could restrict and contain development and result in an incongruous pattern of development such as an extended “finger” into the Green Belt. This does not apply to this site, which is enclosed to the north-east, east and south by the existing urban area and is also enclosed to the north by Thornham Old Road. Based on PPG it is considered that the site has a weak contribution to this purpose, as it is largely enclosed by significant existing development.

b) to prevent neighbouring towns merging into one another

- 6.11. The PPG states that to strongly contribute towards this purpose the site will need to form a substantial part of a gap between towns and its development result in a loss of visual separation of towns. It states that where there is no loss of visual separation due to, for example, the presence or close proximity of structures, natural landscape elements or topography that preserve visual separation, the contribution would be moderate. Where the site forms only a small part of a gap without making visual contribution there would be a weak or no impact. Whilst the urban area of Rochdale is located further north of the site it is contained by the M62 motorway. Furthermore, the existing urban area of Royton extends north past the subject site, which is also located behind residential development front the A671 to the east and Tandle Hill Road to the south. Consequently, the site does not visually contribute towards any perceived gap between Royton and Rochdale.

c) To assist in safeguarding the countryside from encroachment.

- 6.12. The enclosed nature of the site behind residential development which fronts the roads to the east, south and north-east mean the site appears as a logical rounding off to the existing urban area rather than encroachment into the countryside.

d) To preserve the setting and special character of historic towns.

- 6.13. Royton is not a historic town.

e) To assist urban regeneration, by encouraging the recycling of derelict and other urban land

- 6.14. There is no reason to assume that this site has any greater contributions towards this purpose than other Green Belt within the borough.



- 6.15. In summary, if further Green Belt release is necessary this is an appropriate location for such release and should be considered for a housing allocation. Further supporting evidence can be provided at any subsequent consultation stages relating to allocations.

**Respondent No:** 1**Login:** Anonymous**Email:** n/a**Responded** Mar 23, 2026 20:40:44 pm**At:****Last Seen:** Mar 23, 2026 20:40:44 pm**IP Address:** n/a

Q1. Title	Mrs
Q2. First Name	Elizabeth
Q3. Last Name	Gartside
Q4. Job Title (where relevant)	not answered
Q5. Organisation (where relevant)	not answered
Q6. Address	[REDACTED]
Q7. Post Code	[REDACTED]
Q8. Telephone Number	[REDACTED]
Q9. Email Address (where relevant)	[REDACTED]
Q10. To which part of the Local Plan does this representation relate?	Policy
Q11. Please provide the specific paragraph, policy, or section of the policies map you are referring to:	Royton
Q12. Do you consider the Local Plan is legally compliant?	No
Q13. Do you consider the Local Plan is Sound?	No
Q14. Do you consider the Local Plan complies with the Duty to Co-operate?	No
Q15. 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 plan is bad for Royton as it is on green belt. We have already gone through a difficult time to save this land from building plans, and we do not want to have to go through it all again because of a wind farm.	

Q16. 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:

Wind farms should be on the top of existing buildings like car parks, skyscrapers and other buildings, not green belt.

Q17. 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)

Q18. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

not answered

From: Stephen Harris [REDACTED]
Sent: 26 March 2026 16:20
To: SPI Consultations
Subject: RE: Oldham Local Plan: Publication Plan
Attachments: Representations to Oldham Local Plan Publication Redwaters March 2026.pdf;
Representation_Form_Policy H4 Redwaters.pdf; Representation_Form_Policy OL2 Redwaters.pdf;
Representation_Form_Policy H5 Redwaters.pdf; Representation_Form_Policy H1 Redwaters.pdf

Dear Sir/Madam,

Please find attached representations to the above plan for Redwaters Estates and Redwaters Fitfield (Failsworth).

Regards

Stephen

Stephen Harris Bsc (Hons), MRTPI

JOINT MANAGING DIRECTOR

[Emery Planning 2026 Brochure](#)



Direct Dial : 01625 442 786
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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:

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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		Mr
First Name		Stephen
Last Name		Harris
Job Title (where relevant)		Director
Organisation (where relevant)	Redwaters Estates and
Redwaters Fitfield (Failsworth)	Emery Planning
Address Line 1		1-4 South Park Court
Line 2		Hobson Street
Line 3		Macclesfield
Line 4		
Post Code		SK11 8BS
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	H1	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.

Please see attached representations

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

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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.

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We have representations on key parts of the plan these being the housing requirement, 5 year supply, delivery in the plan period, the plan period and the need for additional allocations.

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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.



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Line 4		
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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	H4	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

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

x
x
x

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

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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.



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		Stephen
Last Name		Harris
Job Title (where relevant)		Director
Organisation (where relevant)	Redwaters Estates and
Redwaters Fitfield (Failsworth)	Emery Planning
Address Line 1		1-4 South Park Court
Line 2		Hobson Street
Line 3		Macclesfield
Line 4		
Post Code		SK11 8BS
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	OL2	Policies Map	
-----------	----------------------	--------	----------------------------------	--------------	----------------------

4. Do you consider the Local Plan is:

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

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

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☐

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

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

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Strategic Planning and Information
Oldham Council
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OL1 1LA

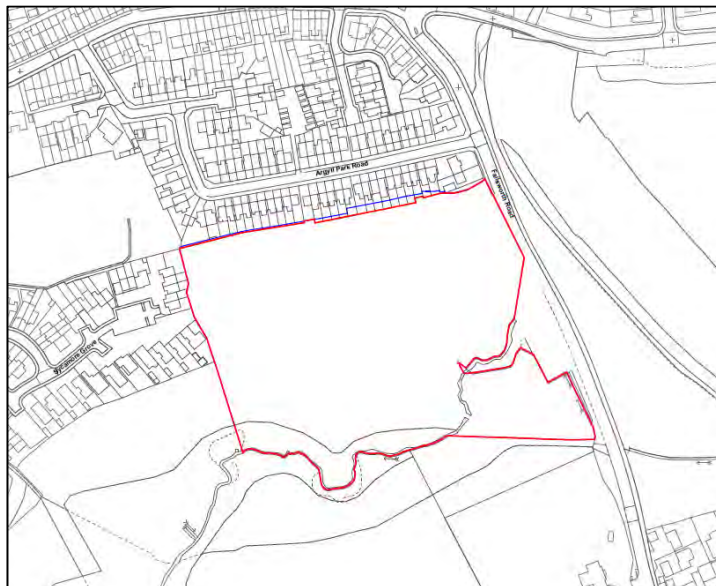
26 March 2026

Dear Sir or Madam

Re: Publication Local Plan Consultation 2026 – Land west of Failsworth Road, Failsworth

We are instructed by our client, Redwaters Estates and Redwaters Fitfield (Failsworth), to submit representations to the Oldham Publication Local Plan 2026 consultation.

Our client's site is at **Appendix EP1** of this letter with an extract below.



Plan-period

The Publication Local Plan has a plan-period until 2039 only. Paragraph 22 of the Framework says the following in relation to plan-periods:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.”

The adoption of the emerging local plan is not likely until next year at the earliest. On this basis, the plan-period for the emerging local plan should run until 2042 as a minimum i.e. the minimum 15 year period. We would suggest that it extends beyond 2042 in order to allow for slippage as local plan examination have historically taken multiple years e.g. the Cheshire East Local Plan Strategy took over 3 years and the Halton Delivery and Allocations Plan took 2 years. This issue has also been recently by the Inspectors for the Wiltshire Local Plan and in their letter dated 27th February 2025 state:

“The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities.

We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified.”

The plan-period for the emerging Oldham Local Plan should extend beyond 2042. There is no known sound reason for the plan-period extending until 2039 only; the PFE itself anticipated that individual plans would extend beyond 2039 to meet national requirements i.e. minimum of 15 years from adoption (para. 1.56 of the PFE) which

“Local plans will be expected to look ahead a minimum period from their adoption, in line with national policy. In the event that a local plan looks beyond 2039, the minimum requirement figures set out in Policies JP-J3, JPJ4 and JP-H1 should be used to inform local plan target(s)”

The plan should be amended accordingly.

Policy H1

The PFE identifies a housing requirement that averages 680 dwellings per annum for Oldham. However, the latest standard method figure for Oldham is 925 no. dwellings per annum and this reflects actual underlying housing need for the Borough.

The Government is very clear that we are in the midst of the most acute housing crisis in living memory with home ownership out of reach for too many, the shortage of houses driving high rents and too many left without access to a safe and secure home. The message is unmistakable that a radical and significant boost in housebuilding is necessary. Access to a safe and secure home is critical to life chances for all ages and this includes people being able to get and keep a job, health and wellbeing and children having the best prospects of staying

in education. The Government's target of 1.5 million new homes over this Parliament will only be met if the standard method for each authority is seen as a minimum and there is a step-change in facilitating development proposals in a timely manner.

See for instance the Written Ministerial Statement (WMS) 30 July 2024 and the Plan for Change (HM Government) 5 December 2024. The introduction to the Draft Framework 2026 makes it clear that the Government remains committed to significantly boosting the supply of housing:

"The government is committed to tackling this country's housing crisis. Decades of failure to build enough homes has constrained growth, pushed ownership out of reach for too many, driven rents to unaffordable levels, and seen more and more people fall into temporary accommodation – including 170,000 children.

Taken together, these reforms represent a truly seismic regearing of the system – in support of growth, and through growth of hope and opportunity. We have pursued them at speed because they are a necessary condition for success. But while necessary, reform alone is not sufficient. If we are to achieve our goals, the system we have moved so rapidly to regear must enter a period of stability over the second half of this Parliament and beyond. One in which every actor – from government to local authorities to applicants – must seize the benefits of change by bringing a laser like focus to delivery."

The housing requirement for the emerging local plan should reflect the latest standard method figure to ensure that the plan is positively prepared and reflects national planning policy guidance.

Pursuing a higher housing requirement will also help to address the substantial affordable housing shortfall across the Borough. The Oldham Local Housing Needs Assessment (LHNA) 2024 identifies an affordable housing need of 669 no. affordable homes per annum for the Borough. This is only marginally below the PfE requirement being carried out forward through the emerging local plan. See our comments further below in relation to Policy H5.

We consider it essential that the plan also includes an Exception policy that is permissive of edge-of-settlement sites coming forward for much-needed affordable housing. See our comments further below in relation to such a policy. Policy H1 should include reference to housing coming forward in accordance with such a policy given the extent of unmet affordable housing need across the Borough.

Policy H5

As noted above, the PfE requirement is only marginally above the identified affordable housing need figure for the Borough. This illustrates the need in itself for aligning the housing requirement for the emerging local plan with the latest standard method figure for the Borough. The policy requirement for between 10% and 25% of major housing schemes based on 680 no. dwellings per annum falls very far short of what is required to make a meaningful contribution to addressing affordable housing needs.

The Council has announced a 'housing crisis' and is committed at a corporate level to tackling this crisis. There is a waiting list of circa. 7,000 people across the Borough, 7,000 living in overcrowded accommodation, 1,000 in temporary accommodation and 700 homeless (Oldham LHNA 2024). Radical policy solutions are necessary to address this level of need and the emerging local plan should reflect the need for transformational change

We would suggest that the Council explores alternative strategies for significantly boosting the supply of affordable housing and this would include the following:

1. Boosting overall housing requirement such that it reflects the latest standard method (i.e. 925 no. homes per annum) and a greater level of affordable housing is thereby secured at policy compliant levels over the plan-period.
2. Identifying more viable edge-of-settlement greenfield sites for development over the plan-period that are able to accommodate greater levels of affordable housing in viability terms.

The Plan should also set out a permissive ‘exception’ policy in order to boost the supply of affordable housing. This is a minimum requirement notwithstanding our comments above at nos. 1 and 2 given the extent of unmet affordable housing needs for the Borough and the strategy set out through the draft plan of pursuing a constrained approach to housing delivery. Such a policy could reflect Policy HO10 of the Draft Framework 2026 such that it allows for edge-of-settlement sites to come forward for affordable housing schemes that relate well physically to the settlements and are proportionate in scale.

In the absence of an exception policy and/or pursuing an alternative strategy in line with nos. 1 and 2 above, there is no mechanism for making a meaningful contribution towards meeting affordable housing needs and the emerging local plan will only serve to entrench the Borough’s housing crisis.

Policy H4

As discussed above, the emerging local plan should include an ‘exception policy’ such that there is a mechanism to boost affordable housing above and beyond what can be anticipated through Policy H1 of the plan. This is essential given the extent of affordable housing need and the limited quantum of affordable homes that could be expected to come forward in accordance with policy compliant levels at Policy H5.

The policy could reflect Policy HO10 of the Draft Framework 2026 as follows:

- “1. Development proposals for housing or traveller sites on land not already allocated for this purpose, and which are located outside settlements, should be supported where they are:
- a. A rural exception site (as defined in the glossary of this Framework) that will provide affordable housing or affordable traveller sites to meet identified local needs – as evidenced through a local housing needs survey or secondary data which is no more than five years old; or
 - b. Sites which comprise community-led development which would not qualify as a rural exception site, but which include one or more types of affordable housing as defined in the glossary of this Framework.
2. Unless otherwise specified in the development plan, exception sites brought forward in one of these two ways should:
- a. Adjoin or be physically well-related to settlements;
 - b. Be no larger than 1 hectare in size, or exceed 5% of the size of the existing settlement; and
 - c. Comprise a majority of affordable housing or affordable traveller pitches. A proportion of market homes may be allowed on the site where essential to enable the delivery of affordable units without grant funding.”

Policy OL2

This policy should simply say that development will be determined in accordance with national Green Belt planning policy guidance. Any additional policy text and requirement is not necessary and is subject to being superseded each and every time national planning policy guidance on the Green Belt is amended. However, clarification should be provided that affordable housing can be brought forward in accordance with an 'exception' policy set out through the plan (see our earlier comments on this matter).

The emerging local plan also seeks to make minor alterations to the Green Belt boundaries notwithstanding development needs. Our client welcomes this approach. However, the Natural Environment and Open Land Topic Paper does not provide any transparency as what methodology and process has been followed. It is unclear why certain Green Belt boundaries have been amended and others have not. We are not aware of any recent Green Belt Assessment having been carried out to inform this process.

Land west of Failsworth Road, Failsworth

Site location and description

The site encompasses 3.3 hectares of land situated directly to the south and east of the existing built-up area of Failsworth. The site falls within the boundaries of the designated Green Belt, although it abuts the identified settlement boundaries. The site is within easy walking distance of a wide range of local services and public transport options.

Green Belt considerations

Paragraph 148 of the Framework states:

"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

Figure 1 of the PPG visually sets out the grey belt test.

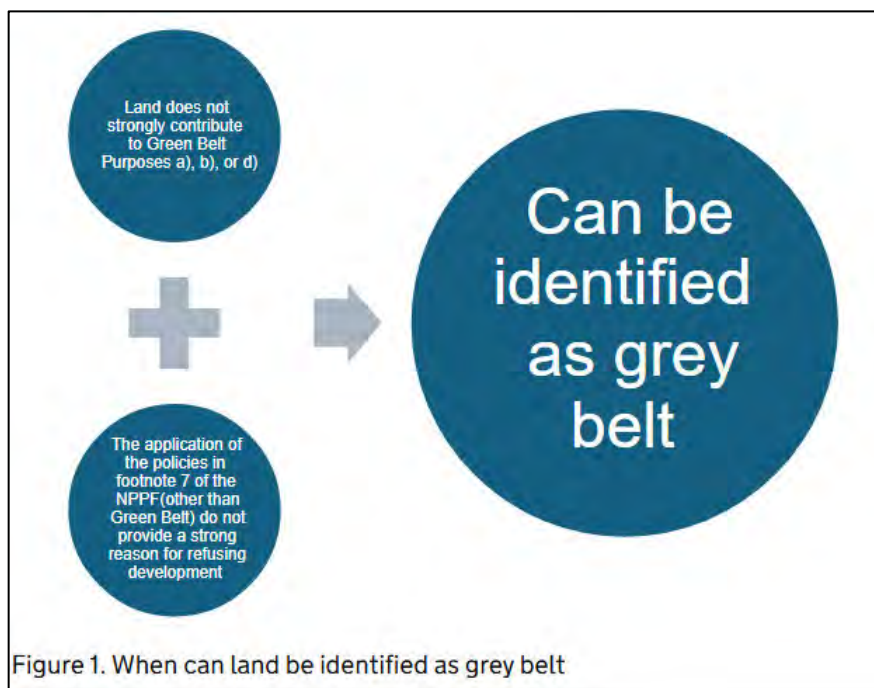


Figure 2 of the PPG visually sets out the test of whether a site is not inappropriate against the test in paragraph 155 of the Framework. As this is a representation to the draft Local Plan we do consider whether the site is not inappropriate. That has been considered as part of the planning application FUL/355686/26.

The Glossary of the Framework defines grey belt as follows:

“For the purposes of plan-making , ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/ or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey Belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

It is therefore necessary to consider the extent to which the site contributes to purposes (a), (b) and (d) of paragraph 143 of the Framework. The site’s contribution to each of these purposes is assessed below, having regard to the recently published guidance contained within the National Planning Practice Guidance.

Purpose A - To check the unrestricted sprawl of large built-up areas

The site is visually and physically contained by existing built development along its northern and western boundaries. Failsworth Road forms a strong and well-defined physical edge to the east, which would effectively prevent any further eastward expansion of development. As such, the site represents a logical and contained opportunity to complete the existing pattern of residential development to the north and east.

The proposed layout has been carefully designed to ensure that the southern portion of the site is retained as green infrastructure, incorporating landscaping and existing vegetation adjacent to the Brook. This approach establishes a clear and defensible boundary along the southern edge of the site and reinforces long-term containment. This is illustrated in Figure 12 of the Design and Access Statement.



Overall, the site occupies a sustainable location and is bounded on all sides by clear and readily recognisable physical features that would prevent unrestricted sprawl. In this context, the site represents a logical and contained location for development.

Purpose B - To prevent neighbouring towns from merging

The PPG is clear that this purpose relates to the merging of towns not villages. Given the nearest settlement is Woodhouses which is a village the site does not form part of a gap between towns. The nearest town further south is Droylsden and development of the site makes no contribution to purpose b).

Notwithstanding, due to its contained nature and the clearly defined and defensible boundaries of the developable area incorporated within the scheme design, the proposal would not contribute to the perception of the merging of the settlement of Failsworth and Droylsden.

Purpose D - To preserve the setting and special character of historic towns

The proposed development on the site follows the existing building line of development from the east to west. The design of the scheme enhances the open space along with southern boundary and integrates a sensitive design that respects the locale and special character of the settlement and surrounding settlements. In this case, the site would not harm the preservation of the historic setting of Failsworth and Woodhouses.

To conclude, it is clear the site does not strongly contribute to the purposes (a), (b) and (d) of the Green Belt having regard to paragraph 143 of the Framework and the PPG guidance and meets the definition of grey belt as set out in the first part of 155 (a).

The second part of criterion 155 a) requires the development to “fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan”. The release of the site for residential development would not affect the ability of the remaining Green Belt across the wider area of the plan serving all five of the Green Belt purposes in a meaningful way as the distances between the settlements will remain.

The site therefore meets the requirements of criterion a of paragraph 155 of the Framework and as there are no footnote 7 policies that provide a strong reason to refuse the site is grey belt and should be allocated to meet the housing needs in the plan period.

Proposed allocation

Site Context

The northern part of the site comprises moderately flat topography, whilst the southern portion comprises a steeper topography towards Lord's Brook. A central line of hedgerow runs from the north boundary to the south boundary, essentially cutting the site in two portions of land. Dense vegetation lies along the boundary to the south, and mature trees delineate the eastern boundary.

The site is highly sustainable in relation to accessibility to key services and transport options. In terms of key services, the site is located within close proximity to a number of key local amenities including primary school and a secondary school, a pharmacy, medical centre, convenience store, as well as various leisure activities and outdoor parks.

The site is located approximately 2km from the Hollinwood Metrolink stop and the Failsworth Metrolink stop. Moston train station, approximately 2.5km from the proposal site, provides frequent services into Manchester City Centre. In terms of bus services, Cutler Hill Road bus stop is located just northeast of the site on Failsworth Road, providing direct services to key services like Middleton and Oldham.

Public Footpath OH/FAILS/34A runs adjacent to the southern boundary of the site and provides pedestrian connectivity between Failsworth Road and Lime Tree Grove.

The site is located within Flood Zone 1 and has a low probability of surface water flood risk, where some areas are affected at 1 in 30, 1 in 100 and 1 in 1,000-year events.

Proposed Development

Our client's site should be allocated for 68 affordable homes together with associated infrastructure which would include the access road, turning points and green infrastructure. The full details are in FUL/355686/26.



The layout illustrates how the proposed dwellings would be set out. The southern area (1.64ha) of the site will be designed as public open space including a Local Area of Play (LAP) along with green infrastructure features such as SuDS

The affordable houses will be managed by a Registered Provider (RP) with a mix of social rent and shared ownership. The development provides a range of house sizes as follows:

Housetype	Beds	People	Sqm	No. Units
Affordable				
HTP A	2	3	73	20
HTP B	3	4	85	32
HTP C	3	5	96	10
HTP D	4	5	97	6
Total	190			68

Policy JP-P1 (Sustainable Places) sets out a range of criteria for new developments. Policy JP-H3 (Type, Size and Design of New Housing) states that development across the plan area should seek to incorporate a range of dwelling types and sizes. All dwellings must also comply with NDSS and Part M4(2). Policy JP-H4 expects new housing developments to be of an appropriate density for the location. The policy sets out a range of densities *“reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high-quality design”*. A density of 35 dwellings per hectare is sought.

A comprehensive Design and Access Statement and accompanying plans has been prepared Urban Green which addresses the policy requirements. With regard to density the developable area is across 1.66ha which equates to a net density of 42.5 dwellings per hectare, which is commensurate with adjacent neighbourhoods and reflecting its sustainable location.

Our client’s site would help to boost housing land supply for the reasons set out earlier and would do so in a sustainable manner.

Summary and conclusions

Our representations on behalf of our client’s site can be summarised as follows:

- The plan-period for the emerging local plan should be extended beyond 2042.
- The housing requirement for the emerging local plan should reflect the standard method.
- An increased housing requirement and the release of viable edge-of-settlement greenfield sites would allow for the authority to make a meaningful contribution towards addressing significant affordable housing needs.
- A higher housing requirement would reflect national planning policy guidance, ensure the plan is positively prepared and align with the Council’s objective of addressing the Borough’s housing crisis in terms of affordable homes.
- The emerging plan should include an ‘exception’ policy to allow edge-of-settlement sustainable sites to come forward over the plan-period for affordable housing schemes.
- Our client’s site could be allocated to help meet identified needs as a grey belt site.

We trust that this clarifies our client's position. Should you require any further information, please do not hesitate to contact us.

Yours sincerely
Emery Planning

Stephen Harris BSc (Hons), MRTPI
Joint Managing Director

[Redacted]
[Redacted]

From: Stephen Harris [REDACTED]
Sent: 26 March 2026 12:58
To: SPI Consultations
Subject: Oldham Local Plan: Publication Plan
Attachments: Representation_Form_Policy H1 Mr M Lumb.pdf; Representation_Form_Policy H1 Sheridan Group.pdf; Representations to Draft Oldham LP - Mr W Lumb March 2026.pdf; Representations to Draft Oldham LP - Sheridan Group March 2026.pdf

Dear Sir/Madam,

Please find attached representations to the above plan for:

- Sheridan Group
- Mr W Lumb.

Regards

Stephen

Stephen Harris Bsc (Hons), MRTPI

JOINT MANAGING DIRECTOR

[Emery Planning 2026 Brochure](#)



[REDACTED]

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Oldham Local Plan
Publication Plan Stage Representation Form

Ref:

**(For official
use only)**

Comments are invited until 11.59pm on Friday 27 March 2026

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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		Stephen
Last Name		Harris
Job Title (where relevant)		Director
Organisation (where relevant)	Sheridan Group	Emery Planning
Address Line 1		1-4 South Park Court
Line 2		Hobson Street
Line 3		Macclesfield
Line 4		
Post Code		SK11 8BS
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	H1	Policies Map	
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4. Do you consider the Local Plan is:

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

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

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☐

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

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Representations to Oldham Local Plan Publication Draft

For The Sheridan Group | 21-416

Project: 21-416
Site Address: Bottom Field Farm, Woodhouses
Client: The Sheridan Group
Date: March 2026
Author: Stephen Harris

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Appendices

EP1. Location Plan



1. Introduction

1.1 Emery Planning is instructed by our client, the Sheridan Group, to submit representations to the Oldham Draft Local Plan Publication Draft. Their specific interest is land at Bottom Field Farm, Woodhouses.

1.2 In summary.

- the plan period will need to be extended to 2042 as a minimum, on the basis that it is unlikely that the plan will be adopted before 2027 and a full 15-year plan period needs to be provided from adoption;
- The Places for Everyone (PFE) is clear that the subsequent local plans have a key role to play in relation to housing delivery and supply, as the housing land supply was not assessed through the PFE examination.
- the Council is heavily reliant on SHLAA sites without planning permission which make up 6,091 dwellings between 2025 and 2039. To ensure a stable delivery of housing to meet the local housing need and deliver sufficient levels of affordable and special housing, additional sites must be allocated to allow contingency should any of the sites fail to come forward.
- Whilst the indicative five-year housing land supply above shows that the Council would demonstrate 6.7 years housing land supply at adoption, we consider that there are a number of factors which mean that this will not be the case. It is crucial that the deliverability of the supply for the first five years from adoption is thoroughly interrogated to ensure that the housing needs will be met and that the supply will not be challenged during this period. Whilst the PFE allocations will increase the deliverable supply, we consider that a greater number of non-strategic allocations are required.
- The GMCA was very clear at the PFE examination that the PFE does some of the 'heavy lifting' in terms of allocating sites and Green Belt release, but by no means all of the 'heavy lifting'. In particular, the supply of housing land was not assessed through the PFE examination, and the GMCA was clear that it would need to be assessed through the District Local Plans. The GMCA also accepted that if the supply turned out to be insufficient to meet the housing requirements, it may be necessary to release further sites from the Green Belt. As we will set out the supply of housing land is not robust and there is a high risk of sites not being delivered as anticipated over a full 15-year plan period. Therefore, additional sites need to be allocated and land safeguarded for future development.
- Our client has an interest in land at Bottom Field Farm, Medlock Road, Woodhouses. Parcel 1 is an allocation in PFE (Site JPA13) and is under construction. These representations concentrate specifically on parcels 2 and 3 which are located to the southern edge of the existing built-up area of Woodhouses and would comprise small-scale and logical urban extensions.



2. Plan Period

2.1 Paragraph 20 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth:

“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

2.2 Paragraph 22 of the Framework states:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

2.3 Paragraph 22 therefore has two very clear requirements:

- Strategic policies should cover at least a 15-year plan period from adoption.
- In instances where larger scale developments form part of the strategy, policies should be set within a vision that looks further ahead (at least 30 years).

2.4 The plan-period for the emerging Oldham Local Plan should extend beyond 2042. There is no known sound reason for the plan-period extending until 2039 only; the PfE itself anticipated that individual plans would extend beyond 2039 to meet national requirements i.e. minimum of 15 years from adoption (para. 1.56 of the PfE) which

“Local plans will be expected to look ahead a minimum period from their adoption, in line with national policy. In the event that a local plan looks beyond 2039, the minimum



requirement figures set out in Policies JP-J3, JPJ4 and JP-H1 should be used to inform local plan target(s)”

- 2.5 This issue has also been recently by the Inspectors for the Wiltshire Local Plan and in their letter dated 27th February 2025 state:

“The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities.

We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified.”

- 2.6 The plan should be amended accordingly.



3. Housing land supply and trajectory

- 3.1 Places for Everyone (PFE) is clear that the subsequent local plans have a key role to play in relation to housing delivery and supply, as the housing land supply was not assessed through the PFE examination.

The Inspectors' Report states:

"14. Each of the nine local planning authorities covered by the Plan has an existing local plan; those were adopted at various times between 1997 and 2023. Each authority is committed to preparing a new local plan within the context of the strategic policies for the city region set out in the Plan. **Those local plans will, amongst other things, identify a supply of housing sites (in addition to the allocations in the Plan) to ensure that the minimum housing requirement for each district set out in the Plan can be met, looking ahead a minimum period from their adoption date as required by national policy.** Similarly, local plans will, where necessary, allocate sites for industrial, warehouse and office developments in addition to the employment allocations in the Plan.

15. In other words, it is not the role of the Plan alone to identify sufficient land to ensure that all objectively assessed needs for housing and other uses can be met, as much of the supply will be brought forward through local plans. Nor is it the role of the Plan to address all strategic and other priorities in all districts, as local plans will be able to contain strategic and non-strategic policies, provided that they are consistent with the Plan and with national policy." (our emphasis)

- 3.2 With the policy in paragraph 78 being that local authorities will not need to demonstrate a 5-year supply for 5 years after adoption it will be necessary for the Examination to consider each site in the trajectory against guidance and robust evidence to be provided by the Council.
- 3.3 Figure 3 of the Housing Background Paper sets out that the total supply of 11,858 dwellings is set out up to 2039.
- 3.4 We note that the totals are not reflective of the actual figures and we provide a table below which shows the supply for the period of 2023-2039 by planning status.



Planning status	2023-2039
No extant planning permission/ not under construction	7,462
Subject of a planning application pending decision (at 1 April 2025)	1,845
Extant planning permission	1,192
Under Construction	1,865
Total	12,364
Small sites allowance	540
Clearance allowance	56
Total	12,848

3.5 Table 3 (Oldham's Housing Land Supply (at 1 April 2025) splits the 'No extant planning permission/ not under construction' and 'Subject of a planning application pending decision (at 1 April 2025)' down as follows:

- Potential & pending sites – 6,091;
- PFE Strategic Allocations – 2,451;
- Lapsed and stalled sites; - 512; and,
- Saved UDP Phase 1 and 2 housing allocations – 253.

3.6 We have significant reservations on the delivery of that supply particularly the above categories, with the exception of the PFE allocations. The position of these sites will have to be scrutinized as part of the Examination on the latest available evidence.

Allocations

3.7 The Housing Topic Paper acknowledges the concerns regarding the deliverability of the Saved UDP allocations and footnote 31 states that "the remaining Saved UDP Housing Allocations will be de-designated as part of the new Local Plan. However, at 1 April 2025, they were still 'saved' and therefore presented in their own category in the housing land supply. Once they are de-designated these sites will, where appropriate, be presented in other relevant categories i.e. 'Potential and Pending Sites/ Lapsed and



Stalled Sites’, in future SHLAA updates”. Whilst they are recategorized they still form part of the trajectory and the deliverability of the sites to be fully examined.

SHLAA sites

- 3.8 The trajectory is heavily reliant on SHLAA sites without permission from 2025 onwards (Table 3). These make up 6,091 dwellings of the supply between 2025 and 2039, a significant number of homes in context of the housing requirement. This means that there would be no certainty that enough homes will come forward.
- 3.9 In order to include these within the supply, the Council should allocate the sites and demonstrate that they are truly deliverable during the plan period through viability testing. The Council should not be relying on sites with marginal viability or sites in existing economic uses. Indeed, the SHLAA acknowledges that sites included in the ‘Potential & Pending’ category *“may have some development issues that will need to be fully assessed and resolved before they could receive planning permission and be developed.”*¹
- 3.10 It is also important to note that this supply only stretches to 2039. Should the plan period be extended to 2042, which we consider to be necessary in order for the plan to be sound, the SHLAA identifies limited capacity of circa 475 dwellings beyond 2039. This would only provide for approximately 120 dwellings per annum, significantly below the local housing need and the local plan requirement.
- 3.11 The NPPF Glossary states:

“Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and **could be viably developed at the point envisaged.” (Our emphasis)**

- 3.12 Further evidence must be prepared by the Council in relation to the viability of these sites in order for them to be included in the supply at levels shown within the trajectory, otherwise the sites should not be included.

Meeting affordable housing need

- 3.13 The Oldham Local Housing Needs Assessment (LHNA) 2024 identifies an affordable housing need of 669 no. affordable homes per annum for the Borough. This is only marginally below the PfE requirement being carried out forward through the emerging local plan. See our comments further below in relation to Policy H5.

¹ SHLAA 2023, paragraph 5.18



- 3.14 The Council has announced a ‘housing crisis’ and is committed at a corporate level to tackling this crisis. There is a waiting list of circa. 7,000 people across the Borough, 7,000 living in overcrowded accommodation, 1,000 in temporary accommodation and 700 homeless (Oldham LHNA 2024). Radical policy solutions are necessary to address this level of need and the emerging local plan should reflect the need for transformational change
- 3.15 Moving forward, we consider that the Council needs to assess the supply of affordable housing that would be delivered through the proposed supply / allocations, and should consider additional allocations where this would boost the supply of affordable housing.

Flexibility

- 3.16 It has been demonstrated above that there are a number of uncertainties which may affect the deliverability of the dwellings included within the trajectory. For example, the UDP allocations being carried forward to this plan have a number of issues affecting their overall deliverability, which have been acknowledged by the Council.
- 3.17 In addition, the Council is heavily reliant on SHLAA sites without planning permission which make up 6,091 dwellings between 2025 and 2039. To ensure a stable delivery of housing to meet the local housing need and deliver sufficient levels of affordable and special housing, additional sites must be allocated to allow contingency should any of the sites fail to come forward.

Five year housing land supply

- 3.18 The Framework defines ‘deliverable’ as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”



- 3.19 The five year supply calculations provided within the SHLAA are at the base date of 1 April 2025. However, paragraph 72(a) of the Framework is clear that authorities should identify the five year supply from the intended date of adoption. Therefore, the Council will need to demonstrate a five-year supply of housing at adoption.
- 3.20 The Housing Background Paper shows that the supply is 6.7 years if all the sites deliver. We now assess against the deliverability tests in the Framework.

Potential and pending sites

- 3.21 Sites included under the 'potential and pending' category contribute 1,439 dwellings to the 5 year supply at 1 April 2025. No clear evidence has been provided to indicate why they are considered to be deliverable in the 5 years following adoption. We do not consider that the sites within this category meet the definition of deliverable and should not be included in the 5 year housing land supply. No evidence exists to suggest that they are deliverable in the short term.

Conclusion

- 3.22 Whilst the indicative five-year housing land supply above shows that the Council would demonstrate 6.7 years, we consider that there are a number of factors which mean that this will not be the case. These are as follows:
- The supply includes lapsed sites for which no clear evidence has been provided to indicate that they are deliverable. The sites having been granted permission previously is not a criterion in determining whether the sites are deliverable and there is not guarantee that permission will be granted again when considered against a newly adopted plan and its policies.
 - A significant number of potential sites without planning permission, some comprising greenfield land, are included within the five year supply. No clear evidence has been provided to indicate that these sites will be deliverable at the time indicated.
 - The UDP allocations being carried forward have failed to deliver since 2006 and no evidence has been provided in relation to how the deliverability issues have been or are being resolved.
- 3.23 Should any of the sites described above be discounted, it is highly unlikely that the Council would be able to demonstrate a five year supply of housing upon adoption of the plan. We therefore have concerns relating to the deliverability of the supply. Whilst the PFE allocations will increase supply, we consider that a greater number of non-strategic allocations are required.



4. Green Belt release

- 4.1 The GMCA was very clear at the PFE examination that the PFE does some of the ‘heavy lifting’ in terms of allocating sites and Green Belt release, but by no means all of the ‘heavy lifting’. In particular, the supply of housing land was not assessed through the PFE examination, and the GMCA was clear that it would need to be assessed through the District Local Plans. The GMCA also accepted that if the supply turned out to be insufficient to meet the housing requirements, it may be necessary to release further sites from the Green Belt. To this effect paragraph 11.3 of PFE states:

“As appropriate, district Local Plans will allocate sites from this supply reflecting the distribution set out in tables 6.1, 6.2 and 7.2, to ensure that the spatial strategy can be met. In the event that it proves necessary to look to land beyond the existing supply, as updated, national planning policy would apply including in the case of the Green Belt the requirement for exceptional circumstances.”

- 4.2 As we have identified above, the supply of housing land is not robust and there is a high risk of sites not being delivered as anticipated over a full 15-year plan period. Therefore, additional sites need to be allocated. Given the absence of non-Green Belt alternatives, as illustrated by the PFE releasing sites from the Green Belt in Oldham, we consider that further Green Belt release is required to meet the housing requirement moving forward. Section 6 of these representations sets out a site that can be considered for allocation.



5. Safeguarded land

5.1 The Places for Everyone releases Green Belt for development, but it does not address the issue of safeguarded land. This was addressed during the examination at the Matter 9 hearing on 13 December 2022, where the GMCA confirmed that safeguarded land is one of the ‘heavy lifting’ items for the District Local Plans to consider under the current Framework.

5.2 We consider that safeguarded land must be provided in the Oldham Local Plan to ensure that the plan is consistent with national policy. Paragraph 142 of the Framework identifies that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 145 requires strategic policies to establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Paragraph 149 states that when defining Green Belt boundaries, plans should (amongst other requirements):

“c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period;”

5.3 Therefore, national policy is clear on the need to ensure that Green Belt boundaries will not need to be altered at the end of the plan period (currently 2039). This is a critical aspect to achieving the intended permanence in the long term. The appropriate mechanism for achieving this is through the provision of safeguarded land for the next plan period, in addition to a plan which provides sufficient land to meet development needs for the current plan period.

5.4 The Joint Core Strategy and Development Management Policies plan identified maintaining Green Belt, protecting open land from inappropriate development and ensuring a portfolio of safeguarded land for future development as a main issue and key challenge facing the borough. The PFE releases Green Belt for development, including in Oldham. Furthermore, Oldham is a significant urban district within Greater Manchester. It is inconceivable that development needs will reduce substantially in the future. Therefore, the only way of ensuring that the Green Belt boundaries can endure beyond the plan period or to provide a Plan B is to designate safeguarded land.

5.5 Our client proposes a site in Section 6 which, if not allocated, could be safeguarded to meet future development needs.



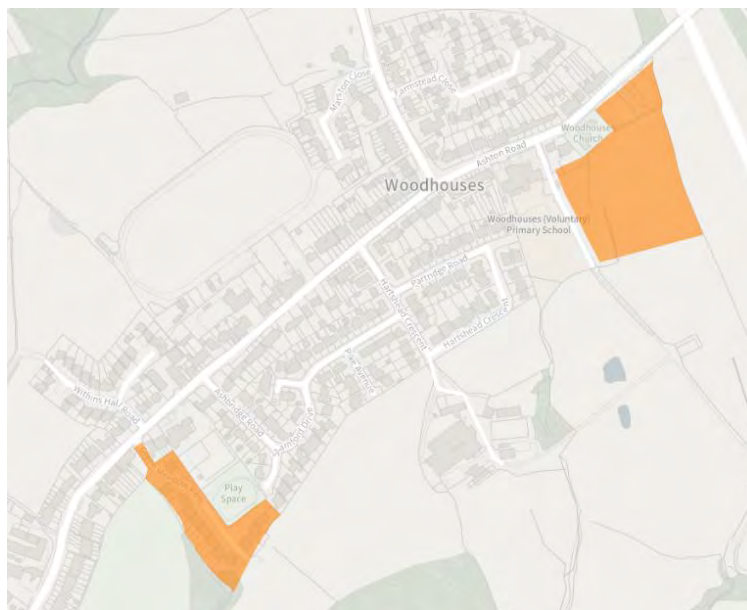
6. Proposed Omission Site

Site location and description

- 6.1 Our client has an interest in land at Bottom Field Farm, Medlock Road, Woodhouses. See the location plan at EP1. Parcel 1 is an allocation in PfE (Site JPA13) and has a resolution to grant planning permission subject to the completion of a S106. Once the consent is issued the applicant intends to commence development.
- 6.2 These representations concentrate specifically on parcels 2 and 3 which are located to the southern edge of the existing built-up area of Woodhouses and would comprise small-scale and logical urban extensions.

Past delivery of new housing within Woodhouses

- 6.3 The Oldham Unitary Development Plan (UDP), adopted 2006, released the following two sites to the edge of Woodhouses from the Green Belt and allocated each site for new housing development:
- Policy H1.2.3 – Land at Ashton Road, Woodhouses – Approximately 51 dwellings.
 - Policy H1.2.4 – Land at Medlock Road, Woodhouses – Approximately 20 dwellings.
- 6.4 These can be seen on the following extract of the Local Plan.



- 6.5 These two housing allocations were ‘saved’ through the adopted Oldham Core Strategy (2011), which was intended to comprise a ‘Part 1’ Local Plan. Site H1.2.4 has been built out by our client.



- 6.6 Woodhouses has been accepted by the Council as a sustainable location for new residential development. Land at Ashton Road (Policy H1.2.3) is now a commitment.

Green Belt

- 6.7 The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary² sets out the “Strategic Case for Exceptional Circumstances to amend the Green Belt and at Appendix 2 our Local level case for Exceptional Circumstances to amend the Green Belt”. For JPA13 we quote the relevant extracts below. Whilst it is for that site and that was a previously developed site, it

1. Justification for inclusion

The site meets Criterion 5 of the Site Selection criteria, as the site provides an opportunity to deliver high-quality homes on previously-developed land whilst making a positive contribution to boosting the competitiveness of the north of Greater Manchester.

The site meets Criterion 7 of the Site Selection criteria, as the site provides an opportunity to deliver high-quality family housing, including affordable housing, to diversify the local housing stock and contribute towards meeting local needs.

2. Harm impact from allocation on Green Belt purposes

The GB GM harm assessment identifies that the allocation (as proposed in 2019) comprises of three distinct parcels and concludes that the land collectively makes a relatively limited to moderate contribution to checking sprawl (Purpose 1), a moderate to relatively significant contribution to protecting the countryside from encroachment (Purpose 3). The northern parcels make a relatively significant contribution to maintaining the separation of Woodhouses and Failsworth & Hollinwood, and the northwestern parcel makes a significant contribution to preserving the setting of the historic settlement of Woodhouses (Purpose 4).

The addendum addresses the change to propose one site rather than three with an added boundary change. The parcel in question scored as ‘moderate’ and will remain so.

3. Harm impact to the Green Belt from release of allocation

Release of the allocation would cause ‘moderate’ harm to Green Belt purposes but would only have ‘minor’ impact on adjacent Green Belt.

In terms of cumulative harm on Strategic Green Belt Area (SGBA) 18, release would have no impact on preventing urban sprawl (Purpose 1), would still leave a significant gap

² Document 07.01.25 in PfE Examination Library



remaining between Woodhouses, Ashton under-Lyne and Droylsden with significant separating features (Purpose 2), would not increase the containment of any land (Purpose 3), and would make a limited impact on the setting of Woodhouses due to size and intervening modern development (Purpose 4).

4. Allocation boundaries

The 2019 harm assessment noted that the release of this site would not significantly increase the containment of any retained Green Belt land but would however result in a significantly more convoluted boundary between the inset settlement and retained Green Belt land.

The addendum states that the line of trees was not considered a significant factor in the previous assessment, as the other boundaries of the allocation have no features to create distinction between settlement and countryside. As a boundary feature it was assumed that the tree line would be retained. The analysis suggested a minor level of impact on adjacent Green Belt as a result of the introduction of a more complex inset boundary, and this will still be the case.

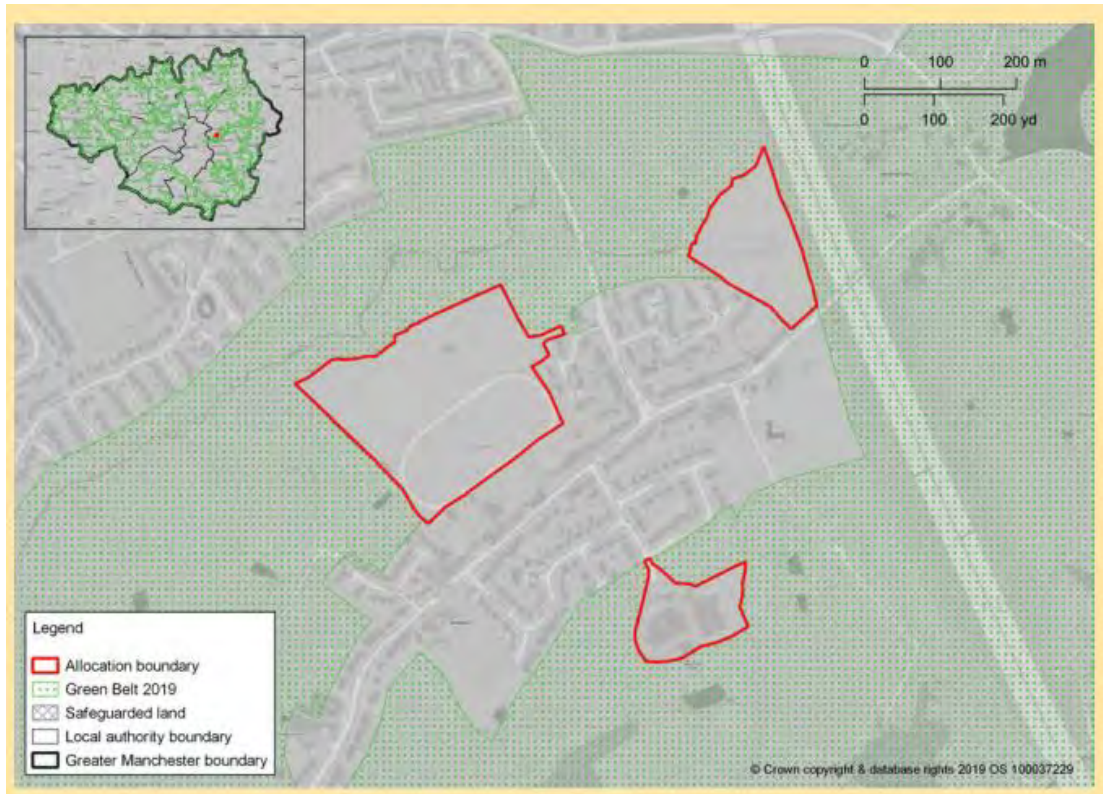
5. Mitigation to address Green Belt harm identified

Evidence finds that strengthening the boundary of the allocation with surrounding retained Green Belt land could potentially increase the future distinction between inset land and retained Green Belt land, limiting the weakening of the Green Belt boundary as a result of release of the allocation.

The addendum, which reflects on fewer development parcels and a tighter parcel boundary at Bottom Field farm does not include updated text on mitigation measures.

- 6.8 The overarching conclusion from the Combined Authorities work as part of PfE is that JPA13 was appropriate for allocation and the impact on the openness of the Green Belt was moderate.
- 6.9 As the LPA will be aware, in the 2019 Draft GMSF, three sites were proposed to be allocated, but our client's site was the only one allocated. The extract from the 2019 Plan is below.





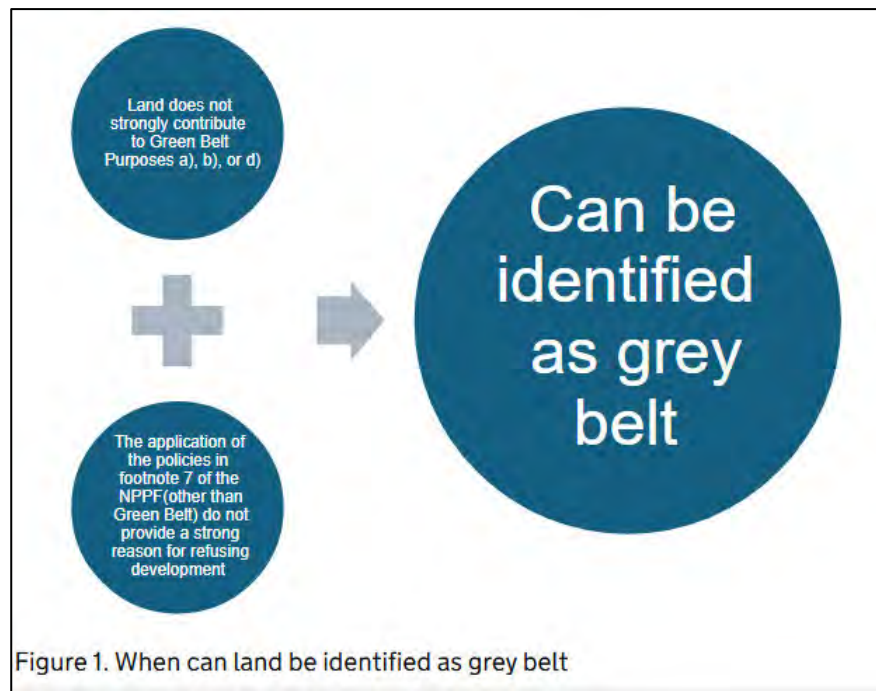
- 6.10 As noted in the Green Belt Topic Paper *“The northern parcels make a relatively significant contribution to maintaining the separation of Woodhouses and Failsworth & Hollinwood, and the northwestern parcel makes a significant contribution to preserving the setting of the historic settlement of Woodhouses”*. Therefore, should additional land be required adjacent to Woodhouses, then parcels 2 and/or 3 as set out in EP1 would be more appropriate.

Grey Belt

- 6.11 Paragraph 148 of the Framework states:

“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”

- 6.12 Figure 1 of the PPG visually sets out the grey belt test.



6.13 Figure 2 of the PPG visually sets out the test of whether a site is not inappropriate against the test in paragraph 155 of the Framework. As this is a representation to the draft Local Plan we do consider whether the site is not inappropriate.

6.14 The Glossary of the Framework defines grey belt as follows:

“For the purposes of plan-making , ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/ or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey Belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

6.15 It is therefore necessary to consider the extent to which the site contributes to purposes (a), (b) and (d) of paragraph 143 of the Framework. The site’s contribution to each of these purposes is assessed below, having regard to the recently published guidance contained within the National Planning Practice Guidance.

Purpose A - To check the unrestricted sprawl of large built-up areas

6.16 The PPG provides guidance as to how Purpose A should be assessed for the purposes of the ‘Grey Belt’ definition at Annex 2 of the Framework (para. 64-005).

- 6.17 Parcel 2 is physically contained by existing built development along its northern and western boundaries. To the east is the M60. Parcel 2 is physically contained by existing built development along its northern and eastern boundaries.
- 6.18 As such, both sites represent a logical and contained opportunity. The PPG states that a site would have a strong contribution if developed would result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt). Given that this land occupies a sustainable location and is bounded on by clear and readily recognisable physical features that would prevent unrestricted sprawl it would have a weak contribution.

Purpose B - To prevent neighbouring towns from merging

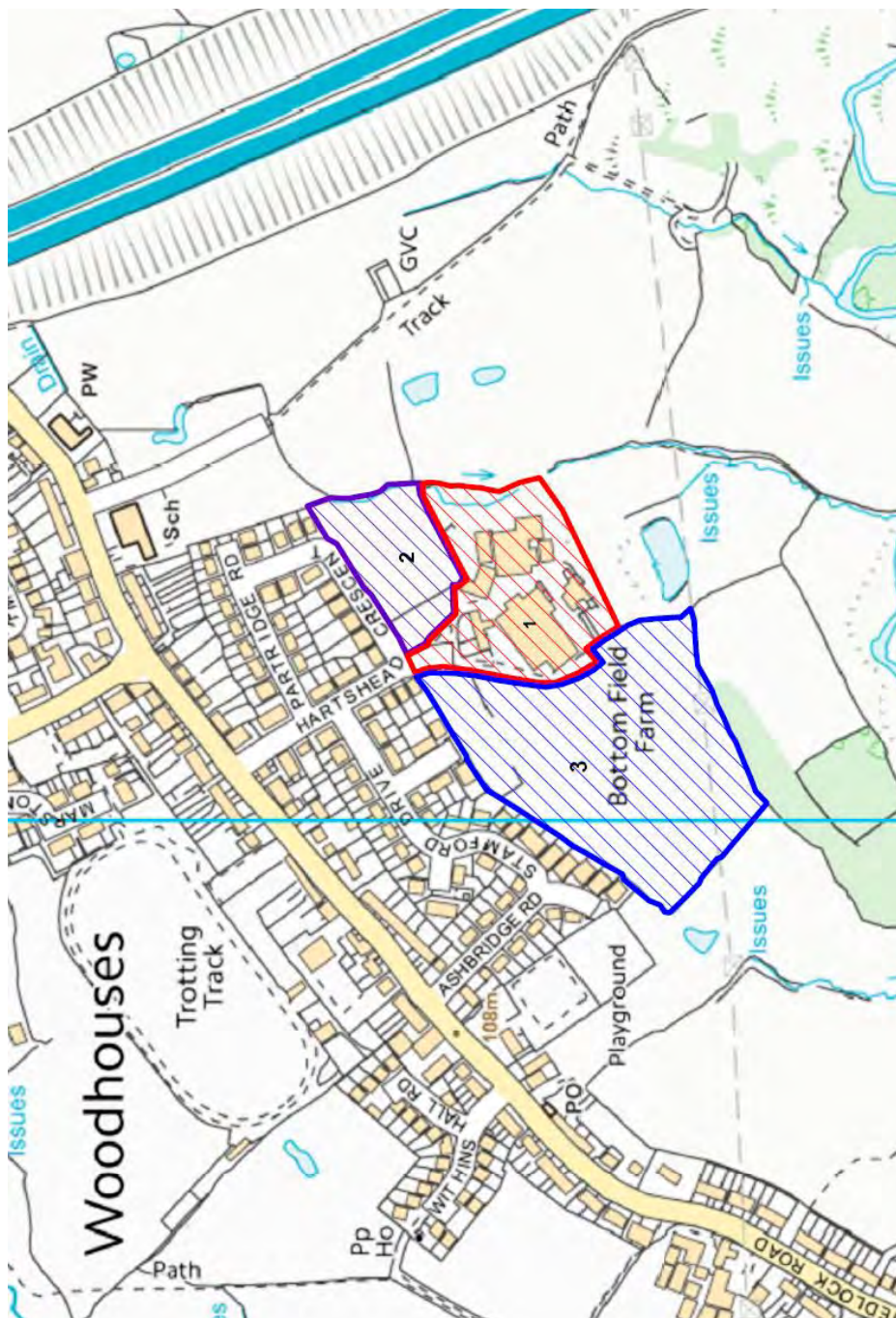
- 6.19 The PPG is clear that this purpose relates to the merging of towns not villages. Given that Woodhouses is a village and the nearest settlement is Droylsden to the south the site does not form part of a gap between towns. The sites does not form a substantial part of a gap between towns and if developed would not result in the loss of visual separation of towns. The site makes no contribution to purpose b).

Purpose D - To preserve the setting and special character of historic towns

- 6.20 Woodhouses is not a historic town, so this criterion does not apply.
- 6.21 To conclude, the sites therefore meet the requirements of criterion a of paragraph 155 of the Framework and as there are no footnote 7 policies that provide a strong reason to refuse the site is grey belt and should be allocated to meet the housing needs in the plan period.



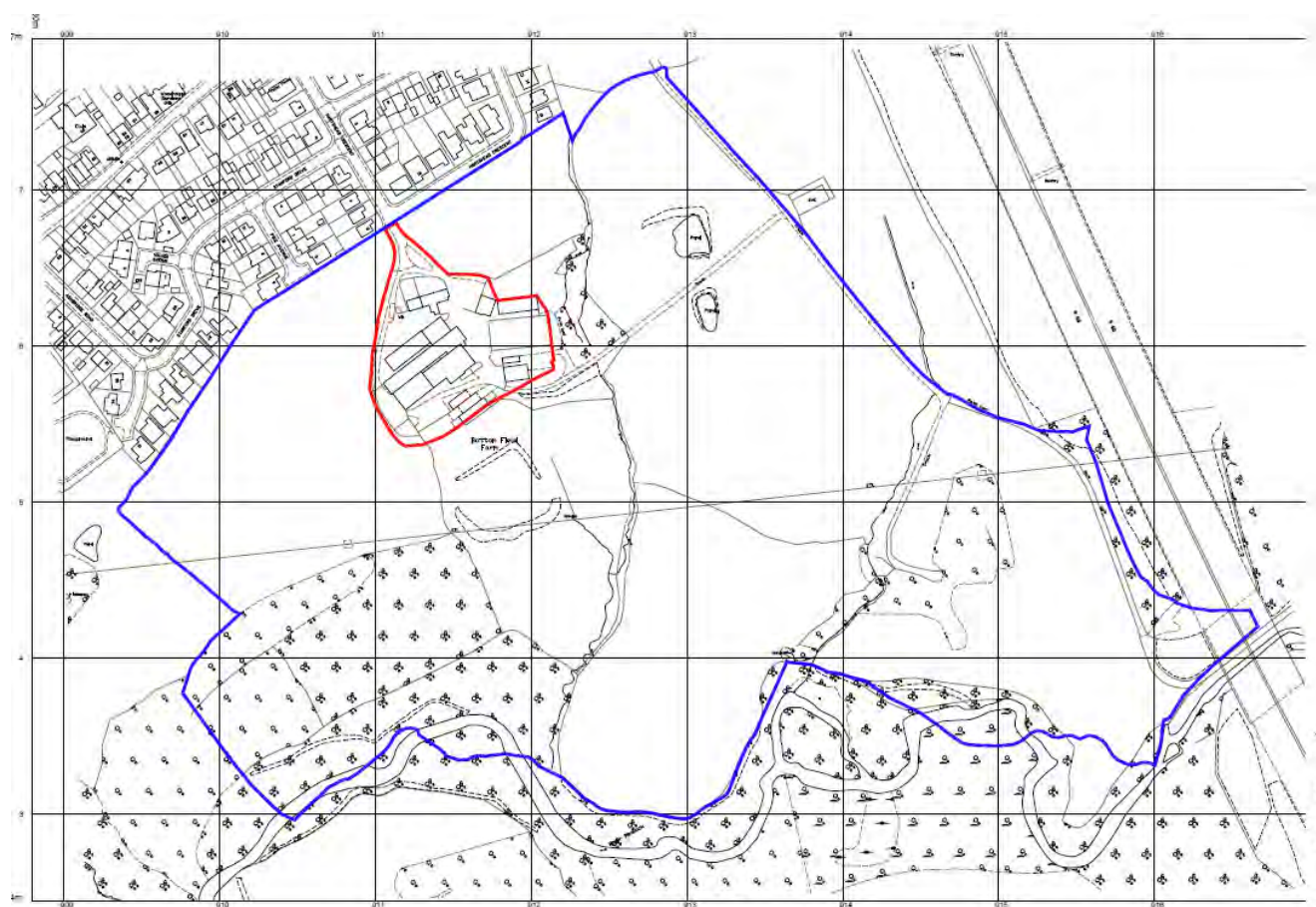
7. Appendix EP1



Parcels 2 and 3 are being promoted. For context, Parcel 1 is JPA13 of PfE and Application FUL/347760/21



Wider Landholding – red edge is JPA13 of PFE and Application FUL/347760/21



From: Stephen Harris [REDACTED]
Sent: 26 March 2026 12:58
To: SPI Consultations
Subject: Oldham Local Plan: Publication Plan
Attachments: Representation_Form_Policy H1 Mr M Lumb.pdf; Representation_Form_Policy H1 Sheridan Group.pdf; Representations to Draft Oldham LP - Mr W Lumb March 2026.pdf; Representations to Draft Oldham LP - Sheridan Group March 2026.pdf

Dear Sir/Madam,

Please find attached representations to the above plan for:

- Sheridan Group
- Mr W Lumb.

Regards

Stephen

Stephen Harris Bsc (Hons), MRTPI

JOINT MANAGING DIRECTOR

[Emery Planning 2026 Brochure](#)



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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		Stephen
Last Name		Harris
Job Title (where relevant)		Director
Organisation (where relevant)	Mr W Lumb	Emery Planning
Address Line 1		1-4 South Park Court
Line 2		Hobson Street
Line 3		Macclesfield
Line 4		
Post Code		SK11 8BS
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	H1	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.

Please see attached representations

(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 representations

(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)

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 have representations on key parts of the plan these being the housing requirement, 5 year supply, delivery in the plan period, the plan period and the need for additional allocations.

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:

x
x
x

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.

Representations to Oldham Local Plan

For Mr W Lumb | 21-416

Project: 21-416
Site Address: Land north of Trent Mill Industrial Estate, Shaw
Client: Mr W Lumb
Date: March 2026
Author: Stephen Harris

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Appendices

EP1. Location Plan



1. Introduction

1.1 Emery Planning is instructed by our client, Mr W Lumb, to submit representations to the Oldham Draft Local Plan consultation. His specific interest is land north of Trent Mill industrial Estate, Shaw.

1.2 In summary.

- the plan period will need to be extended to 2042 as a minimum, on the basis that it is unlikely that the plan will be adopted before 2027 and a full 15-year plan period needs to be provided from adoption;
- The Places for Everyone (PFE) is clear that the subsequent local plans have a key role to play in relation to housing delivery and supply, as the housing land supply was not assessed through the PFE examination.
- the Council is heavily reliant on SHLAA sites without planning permission which make up 6,091 dwellings between 2025 and 2039. To ensure a stable delivery of housing to meet the local housing need and deliver sufficient levels of affordable and special housing, additional sites must be allocated to allow contingency should any of the sites fail to come forward.
- Whilst the indicative five-year housing land supply above shows that the Council would demonstrate 6.7 years housing land supply at adoption, we consider that there are a number of factors which mean that this will not be the case. It is crucial that the deliverability of the supply for the first five years from adoption is thoroughly interrogated to ensure that the housing needs will be met and that the supply will not be challenged during this period. Whilst the PFE allocations will increase the deliverable supply, we consider that a greater number of non-strategic allocations are required.
- The GMCA was very clear at the PFE examination that the PFE does some of the 'heavy lifting' in terms of allocating sites and Green Belt release, but by no means all of the 'heavy lifting'. In particular, the supply of housing land was not assessed through the PFE examination, and the GMCA was clear that it would need to be assessed through the District Local Plans. The GMCA also accepted that if the supply turned out to be insufficient to meet the housing requirements, it may be necessary to release further sites from the Green Belt. As we will set out the supply of housing land is not robust and there is a high risk of sites not being delivered as anticipated over a full 15-year plan period. Therefore, additional sites need to be allocated and land safeguarded for future development.
- The release of our client's site from the Green Belt is justified for the purposes of the NPPF. Furthermore, it could come forward for development with limited landscape impacts given its close visual and physical relationship to the existing urban area.



2. Plan Period

2.1 Paragraph 20 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth:

“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

2.2 Paragraph 22 of the Framework states:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

2.3 Paragraph 22 therefore has two very clear requirements:

- Strategic policies should cover at least a 15-year plan period from adoption.
- In instances where larger scale developments form part of the strategy, policies should be set within a vision that looks further ahead (at least 30 years).

2.4 The plan-period for the emerging Oldham Local Plan should extend beyond 2042. There is no known sound reason for the plan-period extending until 2039 only; the PfE itself anticipated that individual plans would extend beyond 2039 to meet national requirements i.e. minimum of 15 years from adoption (para. 1.56 of the PfE) which

“Local plans will be expected to look ahead a minimum period from their adoption, in line with national policy. In the event that a local plan looks beyond 2039, the minimum



requirement figures set out in Policies JP-J3, JPJ4 and JP-H1 should be used to inform local plan target(s)”

- 2.5 This issue has also been recently by the Inspectors for the Wiltshire Local Plan and in their letter dated 27th February 2025 state:

“The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities.

We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified.”

- 2.6 The plan should be amended accordingly.



3. Housing land supply and trajectory

- 3.1 Places for Everyone (PFE) is clear that the subsequent local plans have a key role to play in relation to housing delivery and supply, as the housing land supply was not assessed through the PFE examination. The Inspectors' Report states:

"14. Each of the nine local planning authorities covered by the Plan has an existing local plan; those were adopted at various times between 1997 and 2023. Each authority is committed to preparing a new local plan within the context of the strategic policies for the city region set out in the Plan. **Those local plans will, amongst other things, identify a supply of housing sites (in addition to the allocations in the Plan) to ensure that the minimum housing requirement for each district set out in the Plan can be met, looking ahead a minimum period from their adoption date as required by national policy.** Similarly, local plans will, where necessary, allocate sites for industrial, warehouse and office developments in addition to the employment allocations in the Plan.

15. In other words, it is not the role of the Plan alone to identify sufficient land to ensure that all objectively assessed needs for housing and other uses can be met, as much of the supply will be brought forward through local plans. Nor is it the role of the Plan to address all strategic and other priorities in all districts, as local plans will be able to contain strategic and non-strategic policies, provided that they are consistent with the Plan and with national policy." (our emphasis)

- 3.2 With the policy in paragraph 78 being that local authorities will not need to demonstrate a 5-year supply for 5 years after adoption it will be necessary for the Examination to consider each site in the trajectory against guidance and robust evidence to be provided by the Council.
- 3.3 Figure 3 of the Housing Background Paper sets out that the total supply of 11,858 dwellings is set out up to 2039.
- 3.4 We note that the totals are not reflective of the actual figures and we provide a table below which shows the supply for the period of 2023-2039 by planning status.



Planning status	2023-2039
No extant planning permission/ not under construction	7,462
Subject of a planning application pending decision (at 1 April 2025)	1,845
Extant planning permission	1,192
Under Construction	1,865
Total	12,364
Small sites allowance	540
Clearance allowance	56
Total	12,848

3.5 Table 3 (Oldham's Housing Land Supply (at 1 April 2025) splits the 'No extant planning permission/ not under construction' and 'Subject of a planning application pending decision (at 1 April 2025)' down as follows:

- Potential & pending sites – 6,091;
- PfE Strategic Allocations – 2,451;
- Lapsed and stalled sites; - 512; and,
- Saved UDP Phase 1 and 2 housing allocations – 253.

3.6 We have significant reservations on the delivery of that supply particularly the above categories, with the exception of the PfE allocations. The position of these sites will have to be scrutinized as part of the Examination on the latest available evidence.

Allocations

3.7 The Housing Topic Paper acknowledges the concerns regarding the deliverability of the Saved UDP allocations and footnote 31 states that "the remaining Saved UDP Housing Allocations will be de-designated as part of the new Local Plan. However, at 1 April 2025, they were still 'saved' and therefore presented in their own category in the housing land supply. Once they are de-designated these sites will, where appropriate, be presented in other relevant categories i.e. 'Potential and Pending Sites/ Lapsed and



Stalled Sites’, in future SHLAA updates”. Whilst they are recategorized they still form part of the trajectory and the deliverability of the sites to be fully examined.

SHLAA sites

- 3.8 The trajectory is heavily reliant on SHLAA sites without permission from 2025 onwards (Table 3). These make up 6,091 dwellings of the supply between 2025 and 2039, a significant number of homes in context of the housing requirement. This means that there would be no certainty that enough homes will come forward.
- 3.9 In order to include these within the supply, the Council should allocate the sites and demonstrate that they are truly deliverable during the plan period through viability testing. The Council should not be relying on sites with marginal viability or sites in existing economic uses. Indeed, the SHLAA acknowledges that sites included in the ‘Potential & Pending’ category *“may have some development issues that will need to be fully assessed and resolved before they could receive planning permission and be developed.”*¹
- 3.10 It is also important to note that this supply only stretches to 2039. Should the plan period be extended to 2042, which we consider to be necessary in order for the plan to be sound, the SHLAA identifies limited capacity of circa 475 dwellings beyond 2039. This would only provide for approximately 120 dwellings per annum, significantly below the local housing need and the local plan requirement.
- 3.11 The NPPF Glossary states:

“Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and **could be viably developed at the point envisaged.” (Our emphasis)**

- 3.12 Further evidence must be prepared by the Council in relation to the viability of these sites in order for them to be included in the supply at levels shown within the trajectory, otherwise the sites should not be included.

Meeting affordable housing need

- 3.13 The Oldham Local Housing Needs Assessment (LHNA) 2024 identifies an affordable housing need of 669 no. affordable homes per annum for the Borough. This is only marginally below the PfE requirement being carried out forward through the emerging local plan. See our comments further below in relation to Policy H5.

¹ SHLAA 2023, paragraph 5.18



- 3.14 The Council has announced a ‘housing crisis’ and is committed at a corporate level to tackling this crisis. There is a waiting list of circa. 7,000 people across the Borough, 7,000 living in overcrowded accommodation, 1,000 in temporary accommodation and 700 homeless (Oldham LHNA 2024). Radical policy solutions are necessary to address this level of need and the emerging local plan should reflect the need for transformational change
- 3.15 Moving forward, we consider that the Council needs to assess the supply of affordable housing that would be delivered through the proposed supply / allocations, and should consider additional allocations where this would boost the supply of affordable housing.

Flexibility

- 3.16 It has been demonstrated above that there are a number of uncertainties which may affect the deliverability of the dwellings included within the trajectory. For example, the UDP allocations being carried forward to this plan have a number of issues affecting their overall deliverability, which have been acknowledged by the Council.
- 3.17 In addition, the Council is heavily reliant on SHLAA sites without planning permission which make up 6,091 dwellings between 2025 and 2039. To ensure a stable delivery of housing to meet the local housing need and deliver sufficient levels of affordable and special housing, additional sites must be allocated to allow contingency should any of the sites fail to come forward.

Five year housing land supply

- 3.18 The Framework defines ‘deliverable’ as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”



- 3.19 The five year supply calculations provided within the SHLAA are at the base date of 1 April 2025. However, paragraph 72(a) of the Framework is clear that authorities should identify the five year supply from the intended date of adoption. Therefore, the Council will need to demonstrate a five-year supply of housing at adoption.
- 3.20 The Housing Background Paper shows that the supply is 6.7 years if all the sites deliver. We now assess against the deliverability tests in the Framework.

Potential and pending sites

- 3.21 Sites included under the 'potential and pending' category contribute 1,439 dwellings to the 5 year supply at 1 April 2025. No clear evidence has been provided to indicate why they are considered to be deliverable in the 5 years following adoption. We do not consider that the sites within this category meet the definition of deliverable and should not be included in the 5 year housing land supply. No evidence exists to suggest that they are deliverable in the short term.

Conclusion

- 3.22 Whilst the indicative five-year housing land supply above shows that the Council would demonstrate 6.7 years, we consider that there are a number of factors which mean that this will not be the case. These are as follows:
- The supply includes lapsed sites for which no clear evidence has been provided to indicate that they are deliverable. The sites having been granted permission previously is not a criterion in determining whether the sites are deliverable and there is not guarantee that permission will be granted again when considered against a newly adopted plan and its policies.
 - A significant number of potential sites without planning permission, some comprising greenfield land, are included within the five year supply. No clear evidence has been provided to indicate that these sites will be deliverable at the time indicated.
 - The UDP allocations being carried forward have failed to deliver since 2006 and no evidence has been provided in relation to how the deliverability issues have been or are being resolved.
- 3.23 Should any of the sites described above be discounted, it is highly unlikely that the Council would be able to demonstrate a five year supply of housing upon adoption of the plan. We therefore have concerns relating to the deliverability of the supply. Whilst the PFE allocations will increase supply, we consider that a greater number of non-strategic allocations are required.



4. Green Belt release

- 4.1 The GMCA was very clear at the PFE examination that the PFE does some of the ‘heavy lifting’ in terms of allocating sites and Green Belt release, but by no means all of the ‘heavy lifting’. In particular, the supply of housing land was not assessed through the PFE examination, and the GMCA was clear that it would need to be assessed through the District Local Plans. The GMCA also accepted that if the supply turned out to be insufficient to meet the housing requirements, it may be necessary to release further sites from the Green Belt. To this effect paragraph 11.3 of PFE states:

“As appropriate, district Local Plans will allocate sites from this supply reflecting the distribution set out in tables 6.1, 6.2 and 7.2, to ensure that the spatial strategy can be met. In the event that it proves necessary to look to land beyond the existing supply, as updated, national planning policy would apply including in the case of the Green Belt the requirement for exceptional circumstances.”

- 4.2 As we have identified above, the supply of housing land is not robust and there is a high risk of sites not being delivered as anticipated over a full 15-year plan period. Therefore, additional sites need to be allocated. Given the absence of non-Green Belt alternatives, as illustrated by the PFE releasing sites from the Green Belt in Oldham, we consider that further Green Belt release is required to meet the housing requirement moving forward. Section 6 of these representations sets out a site that can be considered for allocation.



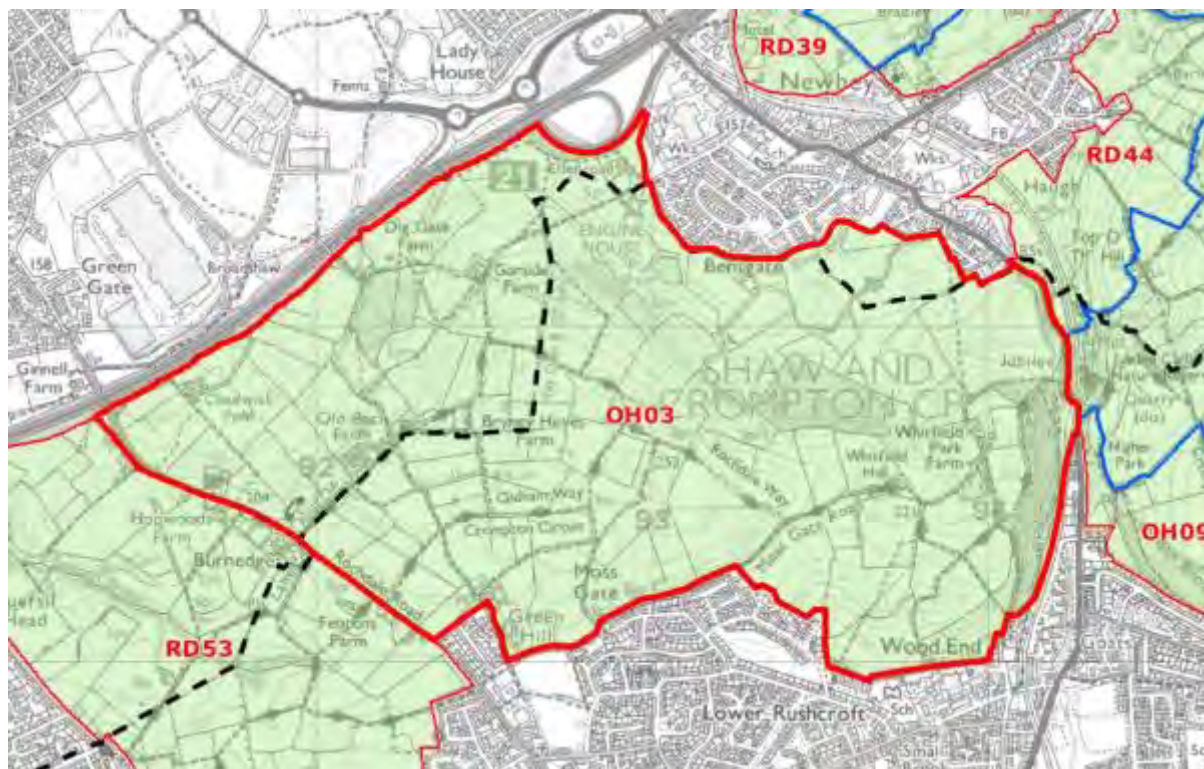
5. Safeguarded land

- 5.1 The Places for Everyone releases Green Belt for development, but it does not address the issue of safeguarded land. This was addressed during the examination at the Matter 9 hearing on 13 December 2022, where the GMCA confirmed that safeguarded land is one of the ‘heavy lifting’ items for the District Local Plans to consider under the current Framework.
- 5.2 We consider that safeguarded land must be provided in the Oldham Local Plan to ensure that the plan is consistent with national policy. Paragraph 142 of the Framework identifies that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 145 requires strategic policies to establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Paragraph 149 states that when defining Green Belt boundaries, plans should (amongst other requirements):
- “c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period;”
- 5.3 Therefore, national policy is clear on the need to ensure that Green Belt boundaries will not need to be altered at the end of the plan period (currently 2039). This is a critical aspect to achieving the intended permanence in the long term. The appropriate mechanism for achieving this is through the provision of safeguarded land for the next plan period, in addition to a plan which provides sufficient land to meet development needs for the current plan period.
- 5.4 The Joint Core Strategy and Development Management Policies plan identified maintaining Green Belt, protecting open land from inappropriate development and ensuring a portfolio of safeguarded land for future development as a main issue and key challenge facing the borough. The PFE releases Green Belt for development, including in Oldham. Furthermore, Oldham is a significant urban district within Greater Manchester. It is inconceivable that development needs will reduce substantially in the future. Therefore, the only way of ensuring that the Green Belt boundaries can endure beyond the plan period or to provide a Plan B is to designate safeguarded land.
- 5.5 Our client proposes a site in Section 6 which, if not allocated, could be safeguarded to meet future development needs.



6. Proposed Omission Site

- 6.1 Our client has an interest in land north of Trent Mill Industrial Estate. See the location plan at EP1.
- 6.2 During PfE the site was assessed as part of a much wider parcel (OH03) as shown below. The LUC assessment was very high level and it is difficult to extrapolate anything meaningful from this assessment.



- 6.3 The site is a minor part of that parcel so the conclusions though PfE are not applicable to this site given that it is located on the northern edge of the existing built-up area of Shaw and would comprise a small-scale and logical urban extension. The aerial image below shows the site being well contained by the existing urban edge and a strong landscaped area to the north. The site rises from south to north.





- 6.1 Below is a site-specific assessment of our client's site within the context of the main purposes of including land within the Green Belt for the purposes of paragraph 138 of the NPPF below:



Main purpose	Summary assessment undertaken by Tyler Grange
To check unrestricted urban sprawl	The site is bounded by: • Woodland and trees to the north. • highway to the eastern boundary. • Residential properties, industrial estate and school which form the built-up urban area. These boundaries provide robust, permanent and defensible edges such that development could not sprawl any further in any direction towards Newhey which was an issues for the wider OH03 parcel. Our client's site makes the least contribution of any part of this wider land parcel and is a self-contained parcel of land.
To prevent neighbouring towns merging into one another	Our client's site, which is located on the northern edge of Shaw, makes no contribution to the merging of Newhey to the north.
Safeguarding the countryside from encroachment	Given the strong urban influences, topography and landscaping, the land does not make a meaningful contribution towards safeguarding the countryside from encroachment should there be the need for housing we which consider is necessary.
Preserve the setting and special character of historic towns	Subject to a sensitive and high quality design and landscaping scheme, development could come forward without harm to the setting of Shaw.

- 6.2 A site-specific assessment of our client's site reveals that it is influenced by existing urban features given its close functional and visual relationship with the built-up area of Shaw. This would also mean that the site meets the requirements of criterion a of paragraph 155 of the Framework and as there are no footnote 7 policies that provide a strong reason to refuse the site is grey belt.
- 6.3 A sensitive design concept for the proposed development, with appropriate landscape buffers would ensure that the integrity of the wider Green Belt would not be undermined. The revised Green Belt boundary would be delineated by defensible, permanent and readily recognisable features to the north, east and west. The resultant Green Belt boundary would meet the tests at paragraph 143 of the NPPF.
- 6.4 Paragraph 145 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to meet unmet and future housing needs of Oldham. This comprises exceptional circumstances for the purposes of the NPPF.
- 6.5 The release of our client's site from the Green Belt is justified for the purposes of the NPPF. Furthermore, it could come forward for development with limited landscape impacts given its close visual and physical relationship to the existing urban area.
- 6.6 This concludes our representations.



7. Appendix EP1



