

Oldham

Local Plan

**Oldham Local Plan: Publication Plan -
Regulation 19(1) Representations - Part 03 -
Hy to Mo**

August 2026



Oldham
Council

Contents Page:

Respondent ID	Name	Individual or Organisation	Page Number
011	Emily Hycran	Historic England	3
024	Adam Johnson	National Highways	12
036	Hayley Knight	HK Planning on behalf of Unearthed Land	21
041	Liora Lederman	Lichfields on behalf of British Land	28
007	Andrew Leyssens	United Utilities	39
040	Melanie Lindsley	The Coal Authority	50
027	Peter Marshall	Greater Manchester Coalition of disabled people	53
012	Chris Martin	Home Builders Federation	59
005	David Moore	Individual	77
020	Graeme Moore	Individual	80

From: Hycran, Emily [REDACTED]
Sent: Wednesday, March 18, 2026 12:16
To: Elizabeth Dryden-Stuart [REDACTED]
Cc: SPI Consultations <SPI.Consultations@oldham.gov.uk>; Georgina Brownridge [REDACTED]
Subject: Oldham LP/SA and SCG

Hi Liz

Please find attached the SCG and a letter on the LP consultation.

Best wishes

Emily

Emily Hycran
Historic Environment Planning Adviser (North)
Development Advice
[REDACTED]
Historic England



Ensuring our heritage lives on and is loved for longer.

historicengland.org.uk

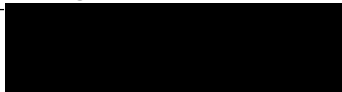
This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. For information about

Oldham Local Plan: Publication Plan

Co-operation Statement

I agree to sign the Statement of Common accompanying the Oldham Local Plan, prepared by Oldham Council.

I confirm that Oldham Council has collaborated effectively over the preparation of the Oldham Local Plan and agree to continuous joint working as set out in this document.

My organisation has no unresolved matters which prevent me from signing the Oldham Local Plan Statement of Common Ground.	AGREE
My organisation is unable to currently sign the Oldham Local Plan Statement of Common Ground for the reasons set out in the accompanying statement.	-
Organisation	HISTORIC ENGLAND
Name	EMILY HRYCAN
Position	HISTORIC ENVIRONMENT PLANNING ADVISER
Signature	
Date	18 March 2026

[REDACTED]
Your ref:

By Email: spi.consultations@oldham.gov.uk

Date: 18 March 2026

Dear Local Plans Team

Oldham Local Plan – Publication Version (January 2026)

Thank you for consulting Historic England on the above document.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England supports the content of the Publication version of the Oldham Local Plan. Our response is attached to this letter.

The plan sets out a positive strategy for the conservation and enhancement of the historic environment as required by the NPPF. The plan includes strategic and development management policies which will sustain and enhance the significance of the Borough's heritage assets.

Historic England has worked with Oldham Council on an ongoing basis throughout the preparation of the Plan. We welcome the opportunities the Council provided at all stages of the Plan to comment and provide advice on the Plan's site allocations and policies. The Council's positive approach to the historic environment and their active engagement with Historic England, has resulted in a Plan which we support and, consider to be sound in terms of the requirements of the NPPF and the historic environment.

In addition, we have no comments to make on the IA because of our response on the Local Plan.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Emily Hrycan

Historic Environment Planning Adviser (North)
Historic England
[REDACTED]

Appendix A: Historic England Comments: Oldham Local Plan – Publication Local Plan (January 2026)

Page	Section	Paragraph/ Policy Reference	Support/ Object/ Comment	Comments	Suggested Amendments
5 Spatial Portrait					
20	5. Spatial Portrait Historic Environm ent	5.26	Support	-	-
21	5. Spatial Portrait	5.20	Support		-
6 Vision for Oldham Borough					
24	6	6.9	Support	-	-
7 Plan Objectives					
26	7	6.9	Support	-	-
8 Homes					
31	8	Policy H2: Housing Mix	Support	-	-
48	8	Policy H7: Gypsies, Travellers and Travelling Showpeople	Support	-	-
9 Economy and Employment					
52	9	Para 9.6	Support	-	-

Page	Section	Paragraph/ Policy Reference	Support/ Object/ Comment	Comments	Suggested Amendments
58	9	Policy E3: Exceptions within Business and Employment Areas	Support	-	-
60	9	Policy E4: Employment Sites outside of Business and Employment Areas	Support	-	-
61	9	Policy E5: Reuse and Redevelopm ent of Mill Buildings	Support	-	-
11 Oldham Town Centre					
72	11	Policy OTC1: Oldham Town Centre	Support	-	-
76	11	OTC2: Protecting and Enhancing Oldham Town Centre Conservation Area	Support	-	-
79	11	OTC3: Creating a	Support	-	-

Page	Section	Paragraph/ Policy Reference	Support/ Object/ Comment	Comments	Suggested Amendments
		Better Public Realm for Oldham Town Centre			
12. Addressing Climate Change					
85	12	Policy CC1: Renewable and Low Carbon Energy	Support	-	-
13. Natural Environment and Open Land					
102	13	Policy OL4: Local Green Spaces	Support	-	-
15. Oldham's Historic Environment					
122	15	Para 15.1 and 15.5	Support	-	-
122	15	Policy HE1: The Historic Environment	Support	-	-
124	15	Policy HE2: Securing the Preservation and Enhancemen t of Oldham's Heritage Assets Para 5	Support	-	-

Page	Section	Paragraph/ Policy Reference	Support/ Object/ Comment	Comments	Suggested Amendments
128	15	Policy HE3: Development proposals affecting conservation areas	Support	-	-
132	15	Policy HE4: Oldham Mills Section on High Priority Mills	Support	-	-
135	15	Policy HE5: Canals	Support	-	-
16. Achieving High Quality Design					
137	16	Policy D1: Achieving High Quality Design	Support	-	-
140	16	Policy D2: Advertiseme nt, Signage and Shop Fronts	Support	-	-
20. Infrastructure and Delivery in Oldham					
181	20	Policy IN1: Digital Infrastructure and Telecommuni cations	Support	-	-

From: Adam Johnson [REDACTED]
Sent: 27 March 2026 09:23
To: SPI Consultations
Subject: National Highways Response: Oldham Local Plan: Publication Plan
Attachments: National Highways Reponse - Oldham Local Plan - Regulation 19 - 27 March 2026.pdf

Good morning

Please find attached National Highways' response to the Oldham Local Plan – Regulation 19.

Kind regards

Adam

Adam Johnson | Spatial Planner
Cheshire | Merseyside | Greater Manchester
Spatial Planning Team, North West Operations
National Highways | Piccadilly Gate | Store Street | Manchester | M1 2WD
[REDACTED]
Web: <http://www.nationalhighways.co.uk/>

For information and guidance on planning and the Strategic Road Network in England, please visit:
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

From: SPI Consultations <SPI.Consultations@oldham.gov.uk>
Sent: 04 February 2026 21:26
Subject: Oldham Local Plan: Publication Plan

Dear Recipient

Oldham Council is preparing a new Local Plan to replace the existing Joint Core Strategy and Development Management Development Plan Document adopted November 2011 and any saved planning policies from the Unitary Development Plan (UDP) 2006.

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

What is the Oldham Local Plan?

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

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

- facilitate the development of supporting infrastructure, such as transport, education and utilities.

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

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

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

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

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

Statement of Representation Procedure

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

Where to view the Oldham Local Plan: Publication Plan

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

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

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

Appointments

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

How to comment

Representations on the Oldham Local Plan: Publication Plan are invited between **Wednesday 4 February 2026 to 11.59pm Wednesday 20 March 2026**.

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

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

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

How your comments will be held

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

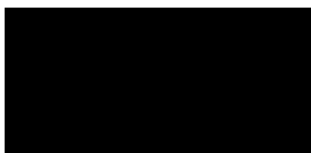
Details of our data protection and commitments and the Strategic Planning and Information Privacy Notice can be found on the Council's website at https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

Local Plan Mailing List

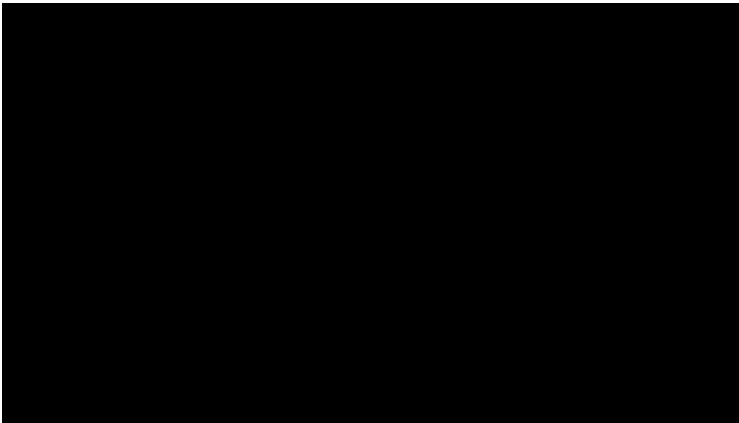
Oldham Council maintains a database of consultees who wish to be kept informed about the Local Plan. If you wish to be removed from the mailing list please visit https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation or contact us via the details below.

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

Yours sincerely



Peter Richards



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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

<https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Three Snowhill, Snowhill Queensway, Birmingham, B4 6GA

Consider the environment. Please don't print this e-mail unless you really need to.

██████████
Your ref:

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

Adam Johnson
National Highways
Piccadilly Gate
Store Street
Manchester
M1 2WD

████████████████████
27 March 2026

Dear Sir / Madam

Oldham Local Plan – Regulation 19 Consultation

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. We are responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.

Our response to this consultation on the Oldham Local Plan Regulation 19 ('the Plan') is written in the context of statutory responsibilities as set out in National Highways' Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 01/2022 The Strategic Road Network and the delivery of sustainable development ('the Circular').

As a statutory consultee in the planning system, National Highways has a regulatory duty to co-operate. Consequently, we are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses.

National Highways' Response to the Plan

National Highways notes that Oldham Council has made refinements to the Local Plan since Regulation 18 that improve the clarity of its transport policy framework and brings it more closely into alignment with national policy, including the requirements of DfT Circular

01/2022. The revised drafting of Policies T1 and T5 introduces clearer expectations around early engagement, cumulative transport assessment and the use of vision-led transport analysis. These elements provide a more structured foundation for considering the relationship between proposed development and the SRN.

However, National Highways would highlight that the transport evidence available at Regulation 19 remains incomplete. While references are made to the Places for Everyone (PfE) evidence base, this material only covers a subset of the development proposed across Oldham and the wider area. It cannot therefore be relied upon to demonstrate the combined impact of the Local Plan allocations alongside cross-boundary development. As a result, the overall effect of the Plan on the SRN, including key junctions on the A663 Broadway, A627(M), M60 and M62, cannot yet be understood.

This is of particular concern given the concentration of growth around several locations with direct SRN interaction, including Stakehill, Hollinwood, Foxdenton and the Broadway corridor. These areas link into heavily used regional routes and have dependencies on movements from neighbouring districts. Without a consolidated cumulative assessment, the level of SRN impact; the nature of required mitigation; and the point at which interventions may be needed, remain undefined. This is due to evidence not being updated or provided in sufficient detail, with that presented in the PfE being of its time. As part of the Local Plan process, National Highways would expect to work with you and understand the impacts and requirements both individually and cumulatively on the SRN.

Within the policy framework, National Highways identifies the following areas where further clarification is required:

Policy T1 – Delivering Oldham’s Transport Priorities

Oldham Council have taken note of previous comments raised. This includes a statement to the effect that impacts to the SRN through the Borough as a result of development should involve National Highways at the earliest opportunity. It is therefore identified that, as developments are brought forward within the Borough following the publication of the Local Plan, National Highways are to be involved in scoping discussions where required.

We are overall supportive of this Policy, noting that this may allow for an early view of cumulative impacts on the SRN, if and when development sites enter into planning. If required, this should allow National Highways to engage with both Oldham Council and developers as to any mitigations and associated timescales, enabling development to come forward without detrimental impact to the operation of the SRN.

However, National Highways would generally consider the planning application stage to be too late to fully realise the requirements for cumulative mitigation. Where multiple planning applicants may be required to undertake cumulative mitigation, there is a risk that their sites may be held back because of funding or viability concerns. It is therefore important that such matters are considered during the Local Plan stage and any necessary mitigations identified at this point.

Policy T5 – Transport Assessments and Travel Plans

We note that the presented Policy makes significant reference to the provision and requirement of engagement with National Highways for sites where affects may be observed on the SRN, with this engagement sufficient to be undertaken within statutory timescales. It is additionally seen that these impacts are to be assessed with cognisance of cumulative impacts of sites within the vicinity rather than each site in isolation and that this will be presented within the body of evidence on a site-by-site basis.

It is recommended that Oldham Council produce a suitable body of evidence for larger strategic sites to support the Vision goals for developments to encourage modal shift for short- and medium-distance trips, and that they should consult with National Highways with regards to how this may be applied to reduce the potential for impacts on the SRN. This approach should follow the guidance in the Working with National Highways to Delivery a Vision-Led Approach for Local Plans (December 2025) document.

National Highways remains overall supportive of the policy, but confirmation should be provided by Oldham Council as to whether the cumulative impacts will take identified cross-boundary PfE sites into account for future baseline assessments, which may also impact the operation of the SRN.

Transport, Housing and Employment Topic Papers

It is noted that the Transport Topic Paper is the only source of dedicated transport evidence made available as part of the Regulation 19 consultation with respect to the potential impacts to the SRN.

Further information is therefore requested on the cumulative development impact of the Local Plan policies and how these may affect the SRN outside of the evidence presented in support of the PfE. The Housing and Employment Topic Papers similarly recognise that development has the potential to lead to cumulative transport impacts, including those in proximity to the SRN. The Topic Papers confirm that detailed consideration of these impacts will be addressed through site-specific transport evidence at the planning application stage, supported through ongoing engagement with National Highways.

Infrastructure Delivery Plan (IDP)

National Highways acknowledges that the IDP is a living document, and that detailed infrastructure requirements, funding mechanisms and delivery timescales will continue to evolve over the Plan period. In relation to transport infrastructure, the IDP aligns with the adopted PfE and the Greater Manchester Transport Strategy 2040, and identifies key junction improvements where joint working with National Highways and TfGM will be required.

It is noted that TfGM have recently consulted on a new Draft Greater Manchester Transport Strategy and Delivery Plan (2027-2037) (consultation closed 9th March, 2026). Therefore, the transport evidence is expected to be updated to align to this plan once the 2050 Strategy has been formally adopted. Following this adoption, the IDP will require revisiting to formally assess if it satisfies the needs of infrastructure requirements, funding mechanisms and delivery timescales over the Local Plan period.

Notwithstanding, the IDP does not provide scheme-level detail or detailed transport assessment, which is appropriate at this stage of plan-making. Detailed assessment of impacts on the SRN, including the scope, timing and delivery of mitigation measures, should be considered at planning application stage of each development plot, though in line with the Circular at paragraph 29, mitigation relating to the SRN should be identified at the plan-making stage:

29. New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.

National Highways' Position

National Highways' concerns relate specifically to the absence of a complete cumulative transport evidence base, resulting in the nature, scale, and timing of potential interventions at the SRN required to support the sustainable delivery of the Local Plan being undefined. We therefore seek clarification from Oldham Council regarding how this

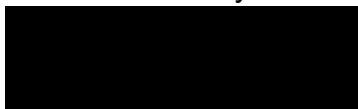
will be addressed and how any future mitigation requirements will be integrated into the policy and delivery framework.

Aside from the matters described above, National Highways has no further comments on the remaining areas of the Plan.

Future Engagement

We welcome further engagement with Oldham Council as you progress your Local Plan through these next stages. In the meantime, if you would like to discuss anything further, please let me know at the email address below.

Yours faithfully



Adam Johnson
Spatial Planning Team



From: Hayley Knight [REDACTED]
Sent: 27 March 2026 16:51
To: SPI Consultations
Cc: Jordan Marsh [REDACTED]
Subject: Publication Local Plan Representations on Behalf of Uearthed Land
Attachments: Oldham Local Plan Publication Stage Reps- Additional Sheet.pdf; Representation Form FINAL 27-Mar-26.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir, Madam,



Please find attached representations to the Oldham Publication Local Plan.

Please can you confirm receipt in due course and keep me informed as the Local Plan progresses.

Kind Regards

Hayley

Hayley Knight, Director



This email is sent for and on behalf of Hayley Knight Planning Limited. Registered in England and Wales Company Number 10463435. Registered Office: 205 Stockport Road, Altrincham, Manchester, WA15 7SW



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	Mrs
First Name	Jordan	Hayley
Last Name	Marsh	Knight
Job Title (where relevant)		Planning Consultant
Organisation (where relevant)	Unearthed Land	Hayley Knight Planning Limited
Address Line 1		205 Stockport Road
Line 2		Altrincham
Line 3		Manchester
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph		Policy	H1	Policies Map	
-----------	----------------------	--------	---------------------------------	--------------	----------------------

4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

Please see attached sheet

(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 sheet

(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 wish to have the opportunity to take part in the hearing sessions should any matters arise that we consider we can contribute towards.

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.

Oldham Local Plan Publication Stage Representation Form

Additional Sheet

Submitted on Behalf of Uearthed Land

Response to Question 5

Policy H1 and the associated Local Plan Policies Map are not considered to be sound as they have not been positively prepared.

The Publication Local Plan makes it clear that there is an 'ever-increasing need for housing' in Oldham which has led to 'a shortage of suitable housing to meet local needs'. Despite this acknowledgement the Publication Local Plan does not allocate any land for future housing development. Policy H1 instead states that:

'Planning applications for residential development, in whole or as part of a mixed-use scheme, will be permitted where the proposed development is consistent with national planning policy and guidance, Places for Everyone (PfE) and other Local Plan policies. Proposals for the development of previously developed land will be considered favourably.

The Council will support residential development proposals that are in sustainable and accessible locations and that promote and encourage use of public transport, walking, wheeling and cycling. All residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL) 4 or above. In all cases, distances should be measured from the centre of the application site. This requirement should be met unless it can be demonstrated by the applicant that it is not appropriate, or the development provides exceptional benefits to the surrounding environment and community.'

The justification for the policy goes onto state 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. Sites may be allocated for residential development in a future development plan document.'

Whilst this is helpful to Developers the justification text is not policy, and therefore this wording does not provide any security to Developers considering delivering new homes in Oldham.

Moreover, upon review of the 'Oldham Local Plan Publication Plan: Housing Topic Paper' it is clear that the Council's housing land supply comprises of:

- 3,251 no. units in the 0-10 year period that are classified as 'potential and pending sites'¹, which the council consider to be suitable but do not benefit from planning permission nor an allocation for a future housing use. This represents 36% of the Council's 0-10 year land supply, which is on land that the development industry have no comfort that the Council would support at application stage as it does not benefit from an allocation;

¹ See Table 3 of the 'Oldham Local Plan Publication Plan: Housing Topic Paper'

- 512 no. units in the 0-15 year period that are classified as 'lapsed and stalled sites'² which have, or have had, the benefit of planning permission previously but are no longer under construction. Given that planning permissions are hard to obtain currently, and the requirements on Applicants is increasing (for example with biodiversity net gain and increasing sustainable drainage requirements) and that the housing market is fairly buoyant and stable at the moment any sites that do not progress to implementation should be reviewed and discounted accordingly from the housing land supply; and
- In total 7,462 no. new homes of the Council's land supply are on land that have no extant planning permission nor are they under construction³ this represents 60% of the Council's housing land supply.

The Publication Local Plan is therefore not considered to be meeting the Borough's objectively assessed needs for new homes, as it does not include housing allocations to ensure that the housing requirements set out in PfE can be met over the plan period. Moreover the Council have not justified why they have presumably chosen to defer the allocation of housing sites to a later document. This is not the approach that has been taken with business and employment sites, which are identified on the Local Plan Policies Map. Policy H1 is therefore not considered to be positively prepared as required by the National Planning Policy Framework.

Response to Question 6

The Council should allocate land for future housing development in order to be able to demonstrate that the Publication Local Plan can be found sound.

The Publication Local Plan includes a number of removed designations, include 'other protected open land' which could provide a boost to the supply of housing land if Developers were given the chance to promote land and obtain allocations for suitable sites.

² See Table 3 of the 'Oldham Local Plan Publication Plan: Housing Topic Paper'

³ See Table 4 of the 'Oldham Local Plan Publication Plan: Housing Topic Paper'

From: Neil Goldsmith [REDACTED]
Sent: 27 March 2026 19:43
To: SPI Consultations
Subject: Publication Plan Stage Representation Form
Attachments: Publication Plan Stage Representation Form _ The Big Oldham Convo.pdf

Please see attached a completed Publication Plan Stage representation form submitted on behalf of British Land who owns the Elk Mill Retail Park.

Regards

Neil Goldsmith
Senior Director
BA (Hons) BPI MRTPI
Lichfields, The Minster Building, 21 Mincing Lane, London EC3R 7AG
[REDACTED]

Lichfields.uk 



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Publication Plan Stage Representation Form

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.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s)

All fields marked with an asterisk (*) are required

Part A - Personal Details

1. Title*

Ms

Maximum 255 characters

2/255

2. First Name*

Liora

Maximum 255 characters

5/255

3. Last Name*

Lederman

Maximum 255 characters

8/255

4. Job Title (where relevant)

Maximum 255 characters

0/255

5. Organisation (where relevant)

Lichfields on behalf of British Land

Maximum 255 characters

36/255

6. Address

Maximum 255 characters

37/255

7. Post Code

Maximum 255 characters

8/255

8. Telephone Number

Maximum 255 characters

0/255

9. Email Address (where relevant)

Maximum 255 characters

28/255

Part B - Your Representation(s)

Please fill in a separate response form for each representation.

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

☐ Paragraph

☒ Policy

☐ Policies Map

Please only select one option.

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

Policy CO7 and supporting paragraph - Hot Food Takeaways and Fast-Food Outlets

Maximum 255 characters

78/255

E.g. Paragraph 1.3 or Policy CC1

12. Do you consider the Local Plan is legally compliant? *

☒ Yes

☐ No

13. Do you consider the Local Plan is Sound? *

☐ Yes

☒ No

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

☐ Yes

☐ No

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

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

Policy CO7 and the relevant supporting text is unsound as it is not justified or effective. This is despite a recognition of the Council's intention to support healthier communities through planning policy.

Part (2) of the policy prevents hot food takeaways and fast-food outlets within 400m of places where children and young people congregate, and paragraph 18.62 of the supporting text includes out-of-centre retail parks such as Elk Mill Retail Park within that definition. This effectively results in a blanket prohibition on fast-food and hot food takeaway uses across out-of-centre retail parks in the Borough, which is unjustified and disproportionate for the following reasons:

1. Out-of-centre retail parks are not places where children and young people generally seek to congregate. As an example, young people are more likely to congregate in Oldham Town Centre, which the policy exempts from the prohibition. The inclusion of retail parks within the definition is therefore inconsistent and, in our view, illogical.
2. Elk Mill Retail Park is not in close proximity to any school, the nearest school is approximately 800m away. A key policy concern underpinning CO7 (i.e. protecting children from easy access to fast food near schools) therefore does not apply here.
3. Fast-food and hot food takeaway outlets are a common and established component of the retail offer at out-of-centre retail parks across the country, including at Elk Mill. A blanket ban on such uses at retail parks fails to reflect this commercial reality and is unduly onerous on shopping park owners and operators. It fails to acknowledge the economic benefits, including job creation, of this type of facility.
4. Any concerns about the impact of a specific fast-food or hot food takeaway proposal can be addressed through the consideration of individual planning applications on their merits. A blanket policy prohibition on fast food outlets is not necessary or proportionate.

Maximum 20,000 characters

1,967/20,000

16. 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: *

Out-of-centre retail parks should be removed from the definition of "places where children and young people congregate" in paragraph 18.62 of the supporting text for Policy CO7. We propose that any application for a hot food takeaway or fast-food outlet within an out-of-centre retail park should instead be considered on its individual merits on a case-by-case basis at the time of application, rather than being subject to a blanket policy prohibition.

A more nuanced approach that reflects the local context and applies an appropriate degree of planning balance to decisions recognising the individual nature of each location and taking into account positive considerations such as job creation, especially for young people, and economic benefits is required.

Maximum 20,000 characters

765/20,000

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

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.

17. 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.

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

We would like to participate in the hearing in order to expand upon our written representations regarding Policy CO7. We consider that through discussion, we would assist the Inspector in understanding why the inclusion of out-of-centre retail parks within the definition of places where children and young people congregate is not justified, and what modification is required to make the policy sound.

Maximum 20,000 characters

402/20,000

Submit

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From: The Big Oldham Convo Team [REDACTED]
Sent: 27 March 2026 16:43
To: [REDACTED]
Subject: Anonymous User completed Publication Plan Stage Representation Form

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

Title

Ms

First Name

Liora

Last Name

Lederman

Organisation (where relevant)

Lichfields on behalf of British Land

Address

[REDACTED]

Post Code

[REDACTED]

Telephone Number

No Answer

Email Address (where relevant)

[REDACTED]

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

Policy

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

Policy CO7 and supporting paragraph - Hot Food Takeaways and Fast-Food Outlets

Do you consider the Local Plan is legally compliant?

Yes

Do you consider the Local Plan is Sound?

No

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

Yes

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

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

Policy CO7 and the relevant supporting text is unsound as it is not justified or effective. This is despite a recognition of the Council's intention to support healthier communities through planning policy. Part (2) of the policy prevents hot food takeaways and fast-food outlets within 400m of places where children

and young people congregate, and paragraph 18.62 of the supporting text includes out-of-centre retail parks such as Elk Mill Retail Park within that definition. This effectively results in a blanket prohibition on fast-food and hot food takeaway uses across out-of-centre retail parks in the Borough, which is unjustified and disproportionate for the following reasons: 1. Out-of-centre retail parks are not places where children and young people generally seek to congregate. As an example, young people are more likely to congregate in Oldham Town Centre, which the policy exempts from the prohibition. The inclusion of retail parks within the definition is therefore inconsistent and, in our view, illogical. 2. Elk Mill Retail Park is not in close proximity to any school, the nearest school is approximately 800m away. A key policy concern underpinning CO7 (i.e. protecting children from easy access to fast food near schools) therefore does not apply here. 3. Fast-food and hot food takeaway outlets are a common and established component of the retail offer at out-of-centre retail parks across the country, including at Elk Mill. A blanket ban on such uses at retail parks fails to reflect this commercial reality and is unduly onerous on shopping park owners and operators. It fails to acknowledge the economic benefits, including job creation, of this type of facility. 4. Any concerns about the impact of a specific fast-food or hot food takeaway proposal can be addressed through the consideration of individual planning applications on their merits. A blanket policy prohibition on fast food outlets is not necessary or proportionate.

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:

Out-of-centre retail parks should be removed from the definition of "places where children and young people congregate" in paragraph 18.62 of the supporting text for Policy CO7. We propose that any application for a hot food takeaway or fast-food outlet within an out-of-centre retail park should instead be considered on its individual merits on a case-by-case basis at the time of application, rather than being subject to a blanket policy prohibition. A more nuanced approach that reflects the local context and applies an appropriate degree of planning balance to decisions recognising the individual nature of each location and taking into account positive considerations such as job creation, especially for young people, and economic benefits is required.

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

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

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

We would like to participate in the hearing in order to expand upon our written representations regarding Policy CO7. We consider that through discussion, we would assist the Inspector in understanding why

the inclusion of out-of-centre retail parks within the definition of places where children and young people congregate is not justified, and what modification is required to make the policy sound.

From: Leyssens, Andrew [REDACTED]
Sent: 23 March 2026 17:05
To: SPI Consultations
Subject: OLDHAM LOCAL PLAN PUBLICATION PLAN DOCUMENT (JANUARY 2026)
Attachments: 20260323 Publication Local Plan FINAL.pdf

By email only

Dear Sir / Madam

OLDHAM LOCAL PLAN PUBLICATION PLAN DOCUMENT (JANUARY 2026)

Please find attached submission made on behalf of United Utilities Water Limited.

Grateful for your confirmation of receipt.

Yours faithfully

Andrew Leyssens



Andrew Leyssens MRTPI
Planning Manager
Asset Management
[REDACTED]
unitedutilities.com

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By email only: spi.consultations@oldham.gov.uk

Your ref:

Our ref:

Date: 23-MAR-26

Dear Sir / Madam

OLDHAM LOCAL PLAN PUBLICATION PLAN DOCUMENT (JANUARY 2026)

Thank you for your consultation seeking the views of United Utilities Water Limited (U UW) as part of the Local Plan process. U UW wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

U UW wishes to highlight the benefit of early, constructive communication with the Council and site promoters to ensure a co-ordinated approach to the delivery of sustainable growth in sustainable locations. When preparing the local plan, new development should be focused in sustainable locations which are accessible to local services and infrastructure. We can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity.

We encourage you to direct future developers to our **pre-application service** to discuss their schemes and highlight any potential issues by contacting:

Website (including 'Live Chat'): [Building & Developing - United Utilities](#)

Telephone (Monday-Friday, 8am-6pm): **0345 072 6067**

Email:

WATER (water mains, supply and metering):

DeveloperServicesWater@uuplc.co.uk

WASTEWATER (public sewers and drainage):

SewerAdoptions@uuplc.co.uk

SLUDGE PIPELINES:

DeveloperServicesWater@uuplc.co.uk

U UW wishes to express its thanks for the continued and ongoing meaningful engagement which has occurred with Oldham Council as part of the preparation of a new local plan.

UUW has reviewed the consultation information and wishes to comment on the following selection of matters.

De-Designation of Allocations

UUW notes that the council has chosen to de-designate the previously identified allocations. This is not the preferred approach of UUW. UUW prefers to see specific allocations identified as part of a new local plan in preference to a reliance on windfall sites. This helps to add certainty for infrastructure providers. Site-specific allocations also assist applicants by allowing us to identify any site-specific issues, for example, large on-site infrastructure which is material to site layout, or the location of a site in a groundwater source protection zone, which may mean that a site needs to be further assessed so that any potential impact on the groundwater environment and public water supply can be appropriately reduced / mitigated. We believe that the identification of such site-specific constraints is critical.

Notwithstanding this position, we note the availability of your housing land supply and employment land supply information. At the current time, we have received the land supply information with a 2024 base date. We have requested the 2025 land supply data from the Greater Manchester Combined Authority and when this is available we will undertake a high-level review of your land supply and provide you with any comments / concerns. This will be an initial review of the sites based on a selection of considerations which we use to assess potential site allocations. It is not an exhaustive review of potential issues that can arise at a site and does not replace early pre-application dialogue with UUW. It is, however, a helpful initial assessment of site constraints and UUW recommends that these constraints are reflected in your wider evidence base, e.g., in an update to your Strategic Housing Land Availability Assessment and your Strategic Flood Risk Assessment.

6. Vision for Building a Better Oldham

Within the Vision, UUW notes the references to responding to the climate change emergencies and being a carbon neutral exemplar with a resilient and multifunctional Green Infrastructure Network. UUW welcomes these references as we consider the need to respond to the climate change emergency as a ‘*golden thread*’ that should run through the plan and guide the preparation of policy. A critical element of climate resilience is sustainable water management and water efficient development, which should be an integral part of high-quality design and place-making.

7. Plan Objectives

Reflecting our comments on the Vision, UUW is particularly supportive of the following elements of the Objectives:

‘PO6 Protecting, restoring and enhancing the natural environment by:

- *using nature-based solutions to mitigate against, and be resilient to, climate change;*

PO7 Promoting sustainable development that mitigates and adapts to climate change by:

- *reducing the risk of flooding to people and property taking into account climate change;*
- *managing flood risk using integrated water management and the provision of multi-functional green infrastructure.*
- *promoting the efficient use of water resources and water quality; and*

- *protecting and reinstating restorable peat, allowing it to act as an important carbon sink.'*

Policy H1 - Delivering a Diverse and Sustainable Housing Offer

In accordance with our above comments, we have requested the 2025 land supply data from the Greater Manchester Combined Authority and when this is available we will undertake a high-level review of your land supply and provide you with any comments / concerns.

Policy H3 – Housing Mix

UUW requests the following additional wording is added to the final sentence of this policy:

'Proposals for self-build and custom housing plots must be built in line with a site-wide infrastructure strategy for foul, surface water and clean water. Fragmented approaches to infrastructure delivery will not be acceptable where sites are part of a wider site.'

Policy E2 – Business and Employment Areas

We request that this policy qualifies that there may be site-specific issues which need to be addressed in the determination process when considering development in Business and Employment Areas. For example, BEA 3 is adjacent to our Oldham Wastewater Treatment Works, where there could be amenity and safety considerations that need to be considered in the determination process for any proposed use. For example, an office use may not be acceptable in this location due to an odour risk. We request that the wording that precedes the 9 numbered points at the end of the Policy is amended to state:

'The uses that will be permitted within our BEAs, subject to any site-specific issues, are:'

Policy OTC1 - Oldham Town Centre

We note the Town Centre development sites listed in paragraph 11.11. As noted in our wider comments, we will undertake a high-level review of these sites and provide you with any comments / concerns for inclusion in your evidence base.

Policy OTC3 – Creating a Better Public Realm for Oldham Town Centre

We request that the following wording is added to the numbered list within this Policy:

'7. integrating the strategy for the management of surface water with the design of the public realm at the start of the design process to ensure that space is made for the SuDS.'

We also recommend the following reasoned justification:

'The design of the public realm will be required to be integrated with opportunities for surface water management. Even in urban environments, there are many examples of how detailed design, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits and rain gardens; can be used to introduce landscaping features that increase our resilience to heavy rainfall events and combat the heat island effect. Proposals for the public realm must focus on delivering high quality landscaping and green infrastructure in new development, which enhances the public realm, reduces impermeable area and 'slows the flow' of surface water.'

Policy OTC4 - Green Infrastructure within and around Oldham Town Centre

In accordance with our wider comments, UUW is supportive of point 6 of this policy.

We request a minor amendment to Paragraph 11.30 as follows:

‘Green infrastructure needs to be multi-functional, not only providing biodiversity benefits but also providing nature-based solutions, such as to manage surface water flood risk and slow the flow of surface water in the form of sustainable drainage systems.’

Policy CC1 – Renewable and Low Carbon Energy

We request the following minor amendment to this policy:

‘9. Flood Risk, hydrology, water quality, and the impact on water supply resources; and water catchment land;’

UUW is supportive of the associated paragraph 12.21, which outlines further commentary relating to any potential proposals for renewable energy on land used for public water supply purposes including water catchment land. It is essential that the impact of proposals such as windfarms are assessed and mitigated to ensure no impact on public water supply, which is an essential service that must be protected.

Policy CC2 – Managing Flood Risk

UUW is supportive of this policy in particular the associated text in Paragraph 12.37 of the reasoned justification which outlines the need to engage with the wastewater undertaker to consider sewer and reservoir flood risk. For example, it will be particularly important to engage with UUW regarding the development of Chew Brook Vale where there is a risk associated with the adjacent reservoir. As noted above, it is important that the Strategic Flood Risk Assessment (SFRA) is regularly updated with evidence relating to these sources of flood risk, especially sewer flood risk. Up-to-date evidence is important to ensure any risks are appropriately considered in the determination process. In addition, we request that any flood risks that we identify in our initial high-level review of your land supply are reflected in an update to your SFRA and in any supporting land supply data, for example, any land assessments for housing and employment land supply.

Policy CC3 – Sustainable Drainage – Foul and Surface Water

Notwithstanding the preparation of this plan in accordance with the 2021 version of the National Planning Policy Framework (NPPF), we wish to highlight the updated requirements for sustainable drainage in the 2024 version of the NPPF. Paragraph 182 of the 2024 NPPF states:

‘Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity.’

In this context, the 2024 version does not restrict the requirement for sustainable drainage to major development proposals. Given the importance of ensuring that every opportunity is taken to

respond to the climate emergency in accordance with the Vision for the Local Plan, we request the below amendments to this policy:

'Applications ~~for major development~~ which could affect drainage on or around the site will be supported by a sustainable drainage strategy and designed in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless there is clear evidence why such techniques are not possible. It should be integrated with the landscaped environment and the strategy for biodiversity net gain.'

In relation to watercourse maintenance, which is essential, we request the following amendment to this policy:

'Applications are required to be accompanied by drainage management and maintenance plans, ~~having regard to~~ including a management and maintenance plan for any watercourse within the application site or an adjacent watercourse where the application site is afforded riparian rights.'

We note the final paragraph of this policy which states:

'Any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA.'

Whilst wholly recognising the importance of this issue, we also acknowledge the statutory position, i.e., there is a right to connect to the public sewer for both foul and surface water management and therefore any subsequent impact on the public sewer rests with the wastewater undertaker to manage in accordance with our statutory obligations and reflecting the infrastructure charges for connecting to the public sewer that we receive when development connects to our network.

The obligation to reduce spills from storm overflows reflects the importance that we have placed in this submission and earlier submissions, where we have emphasised the need for the local planning authority to make every effort to ensure the management of surface water through more sustainable means than the public sewer and to ensure that sustainable drainage systems are included at every opportunity to '*slow the flow*' of surface water. Importantly, it is the planning system that holds the power to control the interaction of surface water with the public sewer, not the wastewater undertaker. Therefore, every effort must be taken to robustly apply the hierarchy for surface water management, ensure the implementation of SuDS and ensure a collaborative approach to the delivery of both drainage infrastructure (foul and surface water) on new development sites. The importance of this matter is also reflective of the partnership work which we are undertaking with the Council in Oldham Town Centre to remove surface water from our network.

In our current investment period (2025-30), we are proposing the biggest investment in water and wastewater services across the North West in over 100 years. The total expenditure by UUW for the period 2025-2030 is approximately £13 billion. A key component of this investment will be investment in our wastewater assets to reduce spills from storm overflows. This reflects the obligation on wastewater undertakers in England to secure a progressive reduction in the adverse impacts of discharges from a wastewater undertaker's storm overflows as set out in the Environment Act 2021 and will be addressed over a number of 5-year investment periods up to 2050. In this context, it is essential that substantial weight is afforded to applications for planning permission for investment in our wastewater infrastructure so that they are approved without delay to ensure that storm spills are reduced expeditiously.

Policy CC4 - Water Efficiency

UUW is wholly supportive of the need to include water efficiency measures as outlined in this policy. We have previously provided detailed evidence to the Council to support this position.

Policy CC5 – Groundwater Source Protection Zones

We welcome this policy, however we request that the requirement for a management plan should address both construction and the operational life of any development. As such we suggest the following amendment:

‘3. ~~Construction Management Plan~~ – a ~~Construction Management Plan~~ will be required to identify the potential impacts from all construction activities and from any activities during the operational life of the development on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.’

Policy OL4 - Local Green Spaces

Reflecting the need to give substantial weight to investment in water and wastewater infrastructure to ensure that our capital investment programme is delivered expeditiously, UUW requests that the exceptions to this policy include water and wastewater infrastructure and therefore we request the following amendments to this policy:

‘12. essential water and wastewater infrastructure.’

Policy N2 – Restoring Nature

Within this policy we note the provision to have regard to ‘proximity to loss’ when selecting off-site areas. We request that this policy also recognises the principle of locating biodiversity so that it is resilient to future pressures. E.g., we would request flexibility in determining the location of BNG so that it does not constrain investment in key strategic infrastructure sites such as our water and wastewater treatment works, which may need to expand in the future to meet growth and / environment needs. On this basis, we request the following amendment:

‘a. Proximity to loss – there is an expectation that off-site areas will be located as close as possible to the development site, incentivised by the biodiversity metric’s spatial risk multiplier, so that the area experiencing loss of biodiversity through the proposed development benefits from the compensation. When selecting a site it is important that it is resilient to future pressures, e.g., it may not be appropriate to locate BNG immediately adjacent to essential infrastructure which may need expand in the future.’

Policy D1 – Achieving High Quality Design

We request that this also refers to a site-wide infrastructure strategy that ensures a co-ordinated and holistic approach.

‘10. adopt a comprehensive and co-ordinated approach to development, supported by a site-wide infrastructure strategy, respecting existing site constraints including utilities situated within, and running through, the site. Fragmented approaches to infrastructure delivery will not be acceptable where sites are part of a wider site;’

Policy D4 – Extensions and alterations to, and development within the curtilage of, a dwellinghouse

We request that an additional criterion is added which states:

‘6. it would not adversely impact the ability to access and maintain existing underground water and wastewater services.’

This is recommended as the curtilages of residential properties can include water and wastewater assets. Building over water assets is not acceptable and building over sewers may not be acceptable without prior agreement. We recommend that the following additional text is added to the reasoned justification:

‘Prior to preparing designs, it is essential to check whether there are any water or wastewater services within the curtilage of a property as building over water assets is not acceptable and building over sewers may not be acceptable without prior agreement.’

Policy T3 – Parking Provision

We request that this policy also refers to including sustainable water management measures in the landscaping of any parking as set out below.

‘The design of parking areas needs to include sustainable water management measures in the landscaping for the site and pedestrian-only safe routes through and around parking areas.’

Policy LE1 – Ensuring a High Standard of Amenity in New Development

This should refer to a wider range of amenity considerations e.g. odour and dust. We also request that it refers to any safety considerations such as hazardous operations at existing sites. This will ensure consistency with the ‘agent of change’ principle. This is requested due to the assets which we operate in the borough including wastewater assets that can generate noise, odour, attract flies and include hazardous operations.

‘Policy LE1 – Ensuring a High Standard of Amenity and Safety in New Development

All developments will be expected to provide and maintain a high standard of amenity and safety (including but not limited to odour, noise, vibration, dust, hazardous installations / operations, etc) ~~protection from noise pollution and vibration~~ for all users and occupiers, including both future occupants and users of the proposed development as well as existing occupants and users of neighbouring land and buildings. This should be achieved and maintained without preventing, or unreasonably restricting, the continued operation of established authorised neighbouring uses and activities.

Proposals will be required to demonstrate, at planning application stage, that where applicable the following matters have been adequately addressed in relation to both the construction and operational life of the development:

- 1. noise and vibration (particularly with regards to noise-sensitive uses), including internal and external levels, timing, duration and character; ~~and~~*
- 2. traffic movements to, from and within, the site including car parking and arrangements for deliveries; ~~and~~*

3. any other relevant amenity / safety considerations.

The Council will not support proposals where ~~new~~ residents and occupiers would be likely to raise complaints about neighbouring ~~existing~~ uses (existing or proposed) or where there are safety concerns as a result of a hazardous installation or operation. Where new developments could be affected by an existing operation or business in its vicinity, the applicant (or 'agent of change') is required to provide suitable mitigation to be agreed with the Council.

Depending on the scale and nature of the development proposed, a detailed assessment to be agreed with the Council may be required to address criteria 1, ~~and 2 and 3~~ above.

Reflecting these recommended amendments we suggest that paragraph 19.22 within the reasoned justification for Policy LE3, is moved to the reasoned justification associated with Policy LE1.

Policy LE2 – Ground Conditions and Contaminated Land

UUW requests the following additional wording to this policy:

'Proposals which are likely to result in contaminants entering formal surface or foul water drainage systems will not be permitted, without the express consent of the asset owner. Where consent of the asset owner is refused, applicants must demonstrate how contaminated water will be addressed at source in their remediation strategy.'

This reflects the importance of remediation strategies addressing contaminants, especially emerging contaminants such as PFAS, which should be treated at source and not transferred.

Policy IN1 Digital Infrastructure and Telecommunications

We request the following wording is added to this policy:

'Proposals must be designed to minimise the impact on water resources and wastewater infrastructure.'

We also request the following reasoned justification text:

'Elements of the new modern economy can be major users of water resources, with associated consequential requirements for wastewater discharge. Applicants must demonstrate how the impact on water resources, wastewater infrastructure and the environment has been mitigated and managed. Reducing impact on water resources and wastewater infrastructure is essential to ensure that critical water and wastewater infrastructure is available for wider growth opportunities and to ensure that the impact on the environment of the emerging modern economy is minimised. Proposals for new Data Storage facilities will be required to undertake early engagement with United Utilities in relation to water and wastewater requirements.'

Policy IN2 – Planning Obligations

To ensure that infrastructure is available to support new development, we request that new wording is added here that states:

'Where developments would increase the need or demand for infrastructure, services and facilities, beyond the capacity of existing provision, new provision and/or contributions towards enhancing

existing provision will be required. It may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of new or improved infrastructure.

Moving forward, we respectfully request that the Council continues to consult with U UW for all future planning documents. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me at planning.liaison@uuplc.co.uk.

Yours faithfully

Andrew Leyssens MRTPI
Asset Management
United Utilities Water Limited

From: The Big Oldham Convo Team [REDACTED]
Sent: 26 March 2026 11:40
To: [REDACTED]
Subject: Anonymous User completed Publication Plan Stage Representation Form

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

Title

Mrs

First Name

Melanie

Last Name

Lindsley

Job Title (where relevant)

Principal Planning & Development Manager

Organisation (where relevant)

The Coal Authority (trading name The Mining Remediation Authority)

Address

[REDACTED]

Post Code

[REDACTED]

Telephone Number

[REDACTED]

Email Address (where relevant)

[REDACTED]

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

Policy

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

Policy LE2 - Ground Conditions and Contaminated Land

Do you consider the Local Plan is legally compliant?

Yes

Do you consider the Local Plan is Sound?

Yes

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

Yes

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

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

The Coal Authority records indicate that within the Oldham area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. We are pleased to see the inclusion of Policy LE2 which requires consideration of ground conditions and identifies that a Coal Mining Risk Assessment should accompany relevant planning applications, and that any necessary remedial measures should be secured by condition. The Coal Authority support the inclusion of Policy LE2 as drafted in the Local Plan.

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:

None

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)

From: peter marshall [REDACTED]
Sent: 27 March 2026 10:04
To: SPI Consultations
Subject: response from Greater Manchester Coalition of disabled people
Attachments: oldham publication plan (2).pdf

Hi

This is the response from Greater Manchester Coalition of disabled people

Thank you for reading through it and giving it some time

We look forward to seeing your next draft we have already been very happy to see some of your previous changes we look forward to the next ones.

Yours
pete

Oldham Local Plan, Publication Plan Consultation Response

Greater Manchester Coalition of Disabled People (GMCDP) proposes that all Local Plans in Greater Manchester should include a requirement to build all new private and social housing developments to Building Regulation M4(2) standard and 10% to Building Regulation M4(3) wheelchair accessible standard. This will help to address the current shortage of wheelchair-accessible homes. The evidence supporting this proposal, outlined below, was prepared by our colleagues in the Manchester Disabled People's Access Group (MDPAG).

It is therefore disappointing to read Oldham Draft Local Plan only proposes a requirement for 5% of new private and social housing developments to be built to an M4(3) wheelchair-accessible standard. The Draft Local Plan states that nearly 20% of households have a member with disabilities. Whilst The State of Ageing in Greater Manchester report confirms that the population of Greater Manchester is ageing. Increasing age may bring mobility impairments. We should plan our future housing stock to accommodate an increase in wheelchair users and people requiring social care and health support in their own homes.

Older people and people coming out of hospital after accidents and health issues may require additional support at home. The impact of people leaving hospital care to inaccessible accommodation may lead to the need for additional rehabilitation and home care staff, and delays in releasing beds for incoming patients.

Whilst it is positive that the need for supported housing is recognised in the Draft Local Plan, many disabled people do not wish to live in 'specialist' forms of housing provision such as 'supported' and 'extra care' housing, particularly if it is away from a familiar area and away from friends and relatives and the support of their local communities. An adequate supply of decent quality, well-designed accessible ordinary housing can enable many more disabled people to live in their own homes and chosen areas, potentially having long-term effects on many other aspects of their lives including health, employment and involvement in local communities. Increasing the pool of new accessible and adaptable M4(2) housing would also enable more older people to

‘age in place’ without having to give up their housing as their needs change.

It is accepted that 80% of the homes we will be living in in 2050 have already been built, so we need to use every possible opportunity to ensure that new housing increases the availability of more accessible homes. The 10% target set in London and Liverpool was done so in recognition of the dire need to ‘catch up’ given that the majority of UK homes were built well before accessibility considerations were a factor.

Many of Oldham's dwelling are terraced properties These are the most difficult to adapt, with 50% of terraced houses found not feasible to be made fully visitable.

‘Places for Everyone (Greater Manchester’s Plan to 2039) requires all new housing developments to be to Building Regulation M4(2) ‘accessible, adaptable’ standard. However, the Plan contains no reference to the provision of M4(3) ‘wheelchair accessible’ housing. GMCA felt that it was for individual local planning authorities to determine the requirement for wheelchair-accessible housing in their Local Plans.

Giving evidence at the Places for Everyone Examination (2023) MDPAG acknowledged that GMCA could not impose a requirement to include a policy on M4(3) on GM Local Authorities. However, they asked that the Plan incorporate a requirement to use ‘best endeavours’ to encourage GM Local Authorities to include such a policy, which the RTPA had suggested would improve the Plan policy.

MDPAG felt that the M4(3) policy should apply not just to the social housing account but to both social and private housing, as some wheelchair users prefer to (and are able to) buy a home. In addition, a home-owner may become a wheelchair user through an accident or ill health and is likely to prefer to purchase a home.

At the Examination MDPAG suggested that it would be appropriate for GMCA, rather than individual Local Authorities, to carry out the necessary research – across the Combined Authority – to establish the

need for M4(3) housing. They were supported in this by the Home Builders Federation representative.

Evidence of Need

The Big Disability Survey 2022 which was carried out by GM Coalition of Disabled People's Panel (GMCDPP) highlighted that there is a significant shortage of wheelchair accessible homes in Greater Manchester. The Survey described the impact this has on the health and wellbeing of wheelchair users.

GMCDP, MDPAG and Breakthrough-UK know of wheelchair users who have been offered employment in Greater Manchester but were unable to take up positions because there are no suitably accessible houses or flats. We also know of wheelchair-users who had to move to a different Local Authority area in GM to obtain suitable accommodation as their needs changed, leaving their family and community support networks.

Young people regularly comment at meetings of GMCDP and MDPAG that they are unable to leave the family home to live independently

Costs

A report by Habinteg / LSE: 'Living not Existing' (2023) revealed that the typical additional cost of building a wheelchair user home – instead of an accessible & adaptable home - for a disabled adult of working age is around £22,000, with the potential ten-year financial and social benefit to the individual and the public purse being around £94,000.

For a household with a child who is a wheelchair user the additional cost is around £26,000 to build a new wheelchair user home. The ten-year economic and social benefit is around £66,000.

For a typical older wheelchair user house-hold the additional cost to build a new wheelchair user home is around £26,000. The ten-year financial and social benefit is around £101,000.

The positive impact on the public purse for each household type benefits both national and local bodies. Local Authority savings amount to around £1,700 per year for a household with a disabled child; £4,800 for a household of working age; and £9,200 for a later years' household. The NHS also benefits by hundreds of pounds, per household, per year.

Meanwhile, benefits to government through tax, national insurance and a reduced welfare spend is £700 for a household with a disabled child, and £2,400 for a working age adult household.

More detailed information is available in the report.

Benefits of wheelchair accessible homes

- Better access to employment for disabled people. In 2016, Habinteg/LSE calculated that disabled people of working age whose access needs at home are met are four times more likely to be in employment.
- Reduced requirement for Social Care due to greater independence of wheelchair users.
- Reduced costs of future adaptations.
- Reduced costs to the NHS as a consequence of shorter discharge times.
- More inclusive communities. Keeping older and/or disabled people in their own homes, in their own communities, with existing support networks (rather than moving to specialist accommodation) improves their wellbeing and supports Age Friendly strategies. Maintaining social and family relationships enables people to get out and about better.

Conclusion

Including a requirement to build 10% of all new homes to the M4(3) standard in Local Plans will increase the stock of accessible homes within Oldham over time.

This will bring benefits to the health and welfare of wheelchair users and will plan for an ageing population.

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The Big Disability Survey (2022).

The State of Ageing in Greater Manchester (January 2024)

New government data reveals accessible homes crisis for disabled people | Latest news | Habinteg Housing Association

Living not Existing' (Habinteg / LSE, 2023)

From: Chris Martin [REDACTED]
Sent: 25 March 2026 12:08
To: SPI Consultations
Subject: Oldham Local Plan - Regulation 19 Consultation
Attachments: HBF Oldham Reg 19 - March 2026.pdf

Dear Sir/Madam,

Please find attached the response of the Home Builders Federation (HBF) to the above consultation.

It would be greatly appreciated if you could confirm receipt of this response.

Kind regards,

Chris



Chris Martin
Regional Planning Manager - NW, NE & Yorkshire

[REDACTED]
HBF House, 27 Broadwall, London SE1 9PL
 



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

spi.consultations@oldham.gov.uk

25/03/2026

Dear Sir/ Madam

Oldham Local Plan: Publication Plan (Regulation 19 Consultation)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Publication Draft of the Oldham Local Plan (Regulation 19).
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multinational PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. We would like to submit the following comments upon selected policies within the Publication Plan. The HBF is keen to ensure that Oldham produces a sound local plan which provides appropriate policies for the area.
4. Whilst not a matter of soundness it would be helpful if the council could include clause/paragraph numbers within all of the policies. The numbering of each clause/paragraph within a policy will aid referencing for those making representations to the Local Plan as well as for applicants and decision makers following the adoption of the plan.

Changes to National Planning Policy and Plan-Making System

5. It is worth highlighting that in December 2025, the Government published a consultation on a new National Planning Policy Framework (NPPF). This followed a Written Ministerial Statement (WMS) made on 27 November 2025 which outlined the Government's intention to move forward with a new plan-making system (reference: UIN HCWS1104). The move to a new plan-making system includes a series of transitional arrangements.

6. It is clear that the Council is intending to use these transitional arrangements and submit its Local Plan for examination under the current plan-making regime. On this basis, paragraphs 4 and 8 in Annex A of the draft NPPF outline that the Local Plan will then be examined under the current NPPF (December 2024). However, it is also notable that in relation to decision making, Annex A also states that from the date the new NPPF is published, Local Plan policies that are “...*any way inconsistent with national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework*”.
7. Consequently, if the emerging NPPF comes forward in its current guise, the Council may need to have regard to national policies for decision making, given that any inconsistency may effectively render policies in the Local Plan that are not consistent with the new NPPF redundant as soon as the Local Plan is adopted.

Places for People Joint Development Plan Document (DPD)

8. The HBF notes that the Places for Everyone (PfE) Joint Development Plan Document (DPD) became part of the statutory development plan for nine of the ten Greater Manchester districts (including Oldham) in March 2024. The PfE DPD is the strategic plan of the area and consequently, the Oldham Local Plan is being brought forward pursuant to this.

Plan Period

The approach to the plan period is not considered to be sound as it is not positively prepared, not effective and not consistent with national policy for the following reasons:

9. The Local Plan covers a period of 2022 to 2039. The NPPF (paragraph 22) states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
10. The Council’s Local Development Scheme (LDS, March 2025) envisages adoption of the Local Plan by Spring 2027. If that is the case, then the plan will only have a plan period of 11 years, which is significantly shorter than the minimum 15 years set out in national policy. The HBF considers a plan period from adoption of 11 years is inadequate to allow for certainty and confidence for developers to invest in the Borough and for the plan to achieve its Vision and Objectives. It also hampers longer term strategic change for the area.

11. Whilst it is noted that the PfE DPD provides a plan period up to 2039, it specifically mentions that the constituent authorities will need to extend their plan period beyond this (see PfE paragraph 1.56). As such, the Council as minimum should extend the plan period to at least 2042 in light of this. This will ensure compliance with national policy.

Vision and Objectives

The approach to the Vision and Objectives is not considered to be sound as it is not positively prepared and not effective for the following reasons:

12. The HBF largely supports the Vision and Objectives as a whole and considers them broadly appropriate in promoting housing growth within the Borough. However, where the Vision states ‘New homes, delivered in sustainable and accessible locations...’, the Council should amend this to ‘New homes, delivered in sustainable and accessible locations where need is located....’. This will ensure that alongside utilising sustainable locations, that the areas identified actually spatially meet the need of the Borough and are where people wish to live. This will ensure the overall approach is positively prepared and effective.

Policy H1 - Delivering a Diverse and Sustainable Housing Offer

Policy H1 is not considered to be sound as it is not positively prepared, not justified, not effective and not consistent with national policy for the following reasons:

13. Oldham’s local housing need is set out in the adopted PfE DPD (Policy JP-H1), it sets out that Oldham is required to deliver at least 11,560 homes over the period 2022 to 2039, which equates to 680 dwellings per annum (dpa). This dwelling requirement is phased over the plan period: 404dpa in the period 2022-2025; 680dpa in the period 2025-2030; and 772dpa in the period 2030-2039.
14. Whilst the HBF agrees with this, it should not be considered in a complete vacuum. It is noted that since the adoption of the PfE,DPD the Government has committed itself to delivering 1.5 million new homes in the country by the end of the parliament. This is reflected in the 30 July 2024 WMS titled ‘Building the homes we need’ (reference: UIN HCWS48). To this end, the Government has amended the Standard Method for calculating Local Housing Need (LHN). This indicates that the LHN for Oldham is now 928dpa which is a 36.5% increase on the PfE figure. Given that this is the case and that there is a clear steer from the Government to provide a step change in housing delivery, the HBF considers that notwithstanding the need for conformity with the PfE DPD, the Council should be doing all it can to try and meet its current LHN. As the housing requirements are set as minima, doing so should not necessarily conflict with the PfE DPD in any event.

15. That aside, and consistent with our comments relating to the plan period, it is considered that the Council should also extend the plan period out to at least 2042, so as to meet the minimum requirement of a 15 year plan period from adoption of the plan (NPPF paragraph 22). Whilst the PfE DPD has a plan period to 2039, it specifically allows for the constituent local planning authorities to go beyond this (paragraph 1.56). The PfE DPD suggests that local planning authorities should roll forward their requirements to an appropriate end date for the plan (outlined in footnote 2), however given the change in circumstances since the adoption of the PfE DPD (namely the new Standard Method), the HBF considers it more appropriate to use the most recent LHN to extend the plan period (ie. 928dpa). This will ensure that the policy is positively prepared, effective and consistent with national policy.
16. Alongside this, Policy H1 outlines that all residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL) 4 or above unless it can be demonstrated by the applicant that it is not appropriate, or the development provides exceptional benefits to the surrounding environment and community. Whilst the HBF would agree that new residential development should be as accessible as possible, there is a danger with this policy, as drafted, that it becomes a blunt tool for assessing the merits of a proposed development site and results in a crude ‘pass/fail’ system based on the GMAL score. Whilst the GMAL score is useful and important, it does not measure the quality of walking routes, where residents may be willing to walk longer distances if the route is good quality. It also does not take into account any infrastructure provision or measures that a development could put in place to mitigate a lower GMAL score or how this might integrate with active travel measures.
17. Consequently, this part of the policy should provide added flexibility which takes into account the GMAL score of a site but allows for a further level of site-specific analysis to test the quality of routes and potential to improve transport infrastructure and other measures in the area. This will make the policy positively prepared and effective.
18. The Oldham Local Plan does not propose any housing allocations, with paragraph 2.6 stating that

“The Oldham Local Plan has been aligned with the plan period of PfE – up to 2039, given that it is supporting delivery of the Joint Plan. In addition, as this Local Plan focuses on non-strategic planning policies that deal with primarily development management matters, it does not include allocations for future development, whether that be for new homes or employment.”
19. Whilst this distinction is noted, the HBF considers that this does not preclude the Local Plan from allocating additional housing sites. Indeed, as the Local Plan is providing a more detailed spatial element for the development plan for Oldham, it is considered that allocating deliverable and developable sites (in line with paragraph 72 of the NPPF) will assist in clearly demonstrating

land supply over the plan period and provide certainty for developers wanting to deliver new homes.

20. Furthermore, the Council will also need to demonstrate that there is land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Without actively allocating such sites, this becomes more difficult to demonstrate and may then disincentivise small and medium sized builders.
21. Indeed, rather than allocations, the Reasoned Justification which accompanies the policy outlines 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.
22. If this is the case, then the HBF would query why such sites cannot be allocated so as to give them development plan status, to demonstrate that the Council is proactively attempting to boost housing supply in the Borough and to provide confidence for the development industry. This is especially important given the total capacity of PfE DPD allocations is 2,766 dwellings and the remaining UDP allocations are 253 dwellings (see Appendix 1a of the SHLAA). This represents a fraction of the total requirement over the plan period. There is therefore a clear need to allocate sites in the plan to ensure that it is positively prepared, effective and that development is appropriately plan-led in nature.

Policy H2 - Density of New Housing

Policy H2 is not considered to be sound as it is not positively prepared, not justified and not effective for the following reasons:

23. This policy sets out the minimum housing densities expected, ranging from 35 dwellings per hectare (dph) to 120dph. It sets out circumstances where lower densities may be acceptable including a demonstrable need for a particular type of house or site-specific issues.
24. The HBF supports the need to make efficient use of land, and this is consistent with the NPPF (paragraphs 124 and 125). Nevertheless, to make the policy effective and positively prepared, there needs to be a degree of flexibility built into the policy.
25. In this regard, the HBF notes that PfE Policy JP-H4 is flexibly worded in that development should have ‘regard to’ the densities set out in the policy. PfE Policy JP-H4 also explains reasons as to why a development may not be able to achieve the densities set out and that density should be appropriate for the location. The HBF therefore considers that Policy H2 needs to note this flexibility and ensure it is accurately reflected in its wording.

26. Whilst the policy currently notes some circumstances where exceptions to the minimum densities may apply, the HBF considers that these can be widened to include (alongside site specific considerations) market aspirations, deliverability, viability and accessibility. This will ensure the policy is effective and positively prepared.
27. The Council, through its evidence will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, SuDs, tree provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision will all impact upon the density which can be delivered upon a site. It is not apparent from the evidence base the degree to which this has been taken into account, and this is required to justify the policy.
28. The policy also requires that developers set out gross and net developable areas when submitting planning applications. The Local Plan will need to define these terms clearly and we would suggest that the definition is tied to a specific industry standard (for example, the RICS standard).

Policy H3 - Housing Mix

Policy H3 is not considered to be sound as it is not positively prepared, not justified and not effective for the following reasons:

29. Policy H3 seeks to ensure that the housing mix coming forward on development sites reflects that which is identified in the Council's Local Housing Needs Assessment (LHNA, 2024). This is distilled in Table H3 which accompanies the policy.
30. The HBF understands the need for a mix of house types and sizes and is generally supportive of providing a range and choice of homes to meet the needs of the local area. The policy recognises that there may be some circumstances when an alternative mix may be appropriate, however, the HBF recommends a more flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market. Whilst it is noted that Table H3 contains a percentage range for each house size/type, this range is rather narrow and the HBF notes it is unrealistic that such ranges apply to all sites in the Borough. Therefore, greater flexibility is needed for the policy to be effective and positively prepared.
31. It is also noted that Table H3 requires the inclusion of a notable percentage of bungalows/level access dwellings on development sites which ranges from 15% – 35% (depending on tenure). The Local Plan points to the justification for this approach being contained in the LHNA. However, whilst this identifies a need for additional housing stock to meet the needs of an ageing

population, the LHNA also identifies that many older people wish to remain in their existing homes and for these to be adapted accordingly (paragraph 4.9). Whilst there appears to be some demand for bungalows (see paragraph 2.49), this does not appear to be consistent with the levels sought through Policy H3 and indeed it is acknowledged the future housing needs for older people can vary greatly (see first bullet point on Page 10) and therefore cannot purely be served by boosting the delivery of bungalows. Furthermore, through the PfE DPD (Policy JP-H3), there is a requirement for all new dwellings to be built to M4(2) standards, which require step-free level access to homes and for such homes to be adaptable to meet the needs of older people. As such, having this as a separate requirement in Policy H3/Table H3 appears superfluous and is unjustified.

32. The Council will also need to explain through its evidence how the requirement for bungalow provision at the levels required on development sites matches with the density requirements outlined in Policy H2. Bungalows by their very design result in lower density development and it is unclear how the requirement can be met whilst also fulfilling Policy H2.

Policy H4 - Providing for Local Housing Needs

Policy H4 is not considered to be sound as it is not justified and not effective for the following reasons:

33. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and vulnerable people. Often such developments have their own specific locational requirements and needs which are different to general needs housing and so the HBF is supportive of the fact that this is referenced in the policy.
34. However, such developments also often have their own viability considerations which should be reflected in the local plan viability assessment, with then separate policy requirements to reflect these differences. It is not apparent from examining the Local Plan Viability Assessment (LPVA, December 2025) that this work has been undertaken. Consequently, this undermines the effectiveness of the policy.
35. In this regard, the HBF would recommend that the Council should be more proactive in working with providers of this type of development. This approach would provide far more certainty to the Council that the need for such accommodation will be met in full.
36. The accompanying Reasoned Justification outlines that the LHNA identifies a requirement for 5% of new dwellings to be built to the M4(3) wheelchair accessible standard (paragraph 8.36), although this is not translated into any policy text. Clarification is therefore required in this respect.

Policy H5 - Affordable Housing

Policy H5 is not considered to be sound as it is not justified and not effective for the following reasons:

37. The approach to affordable housing in Policy H5 is that all development of 10 or more net additional homes will be required to deliver an appropriate portion of affordable housing. The amount required is outlined in Table H4 where a distinction is made between High Value and Medium/Low Value areas and whether a site is brownfield or greenfield. For High Value areas the requirement is 20% on brownfield land and 25% on greenfield land. For Medium and Low Value areas the requirement is 10% on both brownfield and greenfield land.
38. In contrast, the LHNA identifies an affordable housing need of 669dpa (paragraph 5.4) which is just short of the overall housing requirement stated in Policy H1 of the Local Plan (680dpa). It is therefore clear that the number of affordable homes that are planned to be delivered through the Local Plan is capped as a result of viability. This is permitted through paragraph 35 of the NPPF, however it should be noted that the PPG outlines that an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes (Reference ID: 67-008-20190722). This ties in with our comments in relation to Policy H1 and would make the policy effective.
39. Notwithstanding this, the LPVA clearly outlines the viability challenges that are apparent across the Borough. In particular it is clear that affordable housing within Medium and Lower Value Areas is unviable (paragraphs 9.9 – 9.11) and therefore the justification for 10% affordable housing in these areas is unjustified and will need further explanation from the Council. In High Value areas, the 100 dwelling typology is also unviable on greenfield and brownfield land (see Tables 8.4 and 8.7). Again, this would indicate that the policy requirement in this instance is unjustified. This issue is then compounded by Policy H5 not including an option for applicants to negotiate affordable housing requirements in instances where it would not be viable to provide a policy compliant amount. For the policy to be effective, this needs to be included.
40. Policy H5 also includes a tenure split which is:
 - 25% affordable rented;
 - 35% affordable home ownership; and
 - 40% social rented.
41. Footnote 49 of the Local Plan notes that this has been derived from the LHNA. Whilst the broad tenure split matches that in the LHNA, the LHNA assumes that the affordable home ownership will include First Homes (at a 40% discount on median prices). As there is no longer a mandatory

requirement for First Homes within the NPPF, it is unclear whether the Council will still be requesting this. This requires further explanation to ensure that the policy is effective.

42. Furthermore, the HBF considers that there should be a degree in flexibility in the precise split in affordable tenures to take into account site specific viability considerations and also in the event that a Registered Provider cannot be identified to take the social rented or affordable rented properties (given that these would form a substantial part of the affordable mix). This would allow other affordable tenures to be considered and ensure that the delivery of much needed new homes is not delayed.

Policy CC4 - Water Efficiency

Policy CC4 is not considered to be sound as it is not justified and not consistent with national policy for the following reasons:

43. For residential development, Policy CC4 requires that all new developments are expected to achieve, as a minimum, the optional requirement set through Part G of the Building Regulations. The optional water usage standard is 110 litres per person per day, in contrast, the building regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per person per day. This in itself is a higher standard than that achieved by much of the existing housing stock. This mandatory standard already represents an effective demand management measure.
44. The PPG (Reference ID: 56-016-20150327) is clear on the evidence needed for local planning authorities to justify a move to the higher water standard. These are:
- Whether the area falls into the Environment Agency water stressed areas (from its 2021 classification) which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.
 - Water resource management plans produced by water companies.
 - River Basin Management Plans which describe the river basin district and the pressure that the water environment faces. These include information on where water resources are contributing to a water body being classified as ‘at risk’ or ‘probably at risk’ of failing to achieve good ecological status, due to low flows or reduced water availability.
45. The Council indicates that evidence has been prepared by United Utilities and is summarised in its Addressing Climate Change Topic Paper (Appendix 1). This acknowledges that Oldham does not fall in an area of water stress, although it points to a 2024 Water Resource Management Plan (WRMP) as evidence that moving to the optional standard is justified.

46. Having reviewed the WRMP, this notes that there are notable leaks in the current network that need addressing. Furthermore, the region is envisaged to be a net exporter of water to other regions in the future, which should not be the case if the area is lacking in future water supply. Whilst the HBF understands the objectives and desirability to move to a tighter water efficiency standard, it does not consider that the evidence submitted justifies this in line with the PPG.

Policy OL2 – Oldham’s Green Belt

Policy OL2 is not considered to be sound as it is not consistent with national policy and not effective for the following reasons:

47. Paragraph 16 of the NPPF seeks to avoid unnecessary duplication of policies (including those within the NPPF itself). The HBF considers that this policy does not add anything that is not already covered in the NPPF (Section 13). Even if the policy were to be retained, the wording should be significantly reduced to:

“Development proposals within Oldham’s Green Belt will be determined in line with national planning policy.”

48. This would also ensure that the policy picks up on all Green Belt matters including grey belt proposals and make the policy effective.

Policy N2 – Restoring Nature

Policy N2 is not considered to be sound as it is not consistent with national policy and not effective for the following reasons:

49. Policy N2 sets out the Council’s approach to biodiversity net gain (BNG), confirming its alignment with the national requirement for at least 10% net gain to be achieved. The PPG is clear that plan-makers do not need to duplicate the detailed provisions that is already in the statutory framework for BNG (Reference ID: 74-006-20240214).
50. Consequently, the HBF considers that much of this policy can be deleted as elements such as the sequential approach to the location of BNG (and the spatial risk multiplier) are already covered elsewhere and are readily understood. The HBF however supports the reference to Local Nature Recovery Strategy (LNRS) areas as an option for achieving BNG, although to ensure the policy is effective, this should not necessarily affect the ability of developers to achieve BNG through other means (in line with the sequential approach to the location of BNG).

Policy N3 – Enhancing Green Infrastructure through development

Policy N3 is not considered to be sound as it is not effective, not justified and not consistent with national policy for the following reasons:

51. This policy requires *inter alia* that major developments (defined as 20 dwellings or above) use the latest version of the national Urban Greening Factor calculator, or equivalent, to demonstrate that the development will achieve an Urban Greening Factor score, or equivalent, of at least 0.4 for residential development.
52. Whilst laudable, the HBF is concerned that this approach may not be appropriate in all circumstances. The Urban Greening Factor may not be able to be applied to all sites, and the Council will need to be certain that it is not unduly penalising sites where this score cannot legitimately be provided. Indeed, the rigid application of the Urban Greening Factor can have significant implications in relation to site densities (in light of Policy H2), site layouts, highways, ongoing maintenance, and the viability of development. It is also unclear how this policy's aim is related to Policy N4 - Tree Replacement.
53. To ensure effectiveness and that the approach in Policy N3 is justified, the HBF would recommend a much less formulaic approach is considered which is more adaptable to site specific circumstances.
54. It is also noted that the accompanying Reasoned Justification mentions the requirement for tree lined streets (paragraph 14.53). This is contained in paragraph 136 of the NPPF. For consistency with national policy, this text should also make reference to footnote 52 which accompanies paragraph 136 and notes that tree lined streets are not required where there are clear, justifiable and compelling reasons why this would be inappropriate

Policy N4 - Trees

Policy N4 is not considered to be sound as it is not effective, is not positively prepared and not justified for the following reasons:

55. This policy states that trees and hedgerows should be retained wherever possible through careful siting and design. Where there is tree loss, the number of replacement trees required will depend on the stem diameter of the tree proposed for the removal. This is then set out in Table N1, with a tree replacement between 1:2 and 1:9.
56. The HBF considers that the tree replacement ratios proposed have potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments (notably the requirements in Policy H2), this in itself has potential to

have a significant impact on the viability of developments. Whilst the cost of Policy N4 is taken into account in the LPVA, this is only the physical costs of the trees and not the knock-on effect this has on site densities. This appears to have little thought behind it and the HBF considers this undermines the effectiveness of the policy and leaves it unjustified.

Policy D1 – Achieving High Quality Design

Policy D1 is not considered to be sound as it is not effective and not consistent with national policy for the following reasons:

57. The HBF agrees that good design is an important facet of a successful development and contributes to a site's overall sustainability. This policy provides an overview of the key principles that need to be addressed to facilitate high quality design. In general, the HBF agrees with these principles, however the policy requires consistency with local design guides. These are then listed in the Reasoned Justification (paragraph 16.6), however none of these are development plan documents and therefore requiring that development adheres to these documents is not appropriate, as the implication is that through Policy D1 they are effectively given development plan status when they have not been scrutinised in the same manner (ie. through an independent examination). As such, to be consistent with national policy, Policy D1 should seek to ensure that applicants have 'regard to' local design guides.
58. The policy also mentions that developments that raise significant design issues will be expected to undergo a local design review. The accompanying footnote (footnote 139) defines this as an independent consideration of the planning application proposal undertaken by a panel of relevant professionals prior to the formal determination of the proposal by the Council, with all costs met by the applicant. The HBF is generally supportive of the use of design reviews, but it will be important that this tool is used appropriately and in a proportionate manner. Design review is broadly considered to be a valuable method to promote good design and an efficient way to improve quality. The HBF considered that if they are well managed, design review panels can provide high quality design advice that can add value to the places in which they are built. The HBF considers that it will be important that any design review is undertaken at the right time, that any feedback provided is constructive and sufficiently detailed, that an appropriate planning balance is sought to ensure that all policy requirements can be met (not just those in relation to design) and to ensure that the applicant is fully engaged in the process.
59. The concern from the HBF is that the threshold for when a design review is required, plus the actual process of the design review is unclear at this time. This does not provide certainty for applicants and if the design review threshold is too low or the process is ill defined or overly complex, this may lead to significant delays in determining planning applications. We have seen issues with design review panels elsewhere in the country where the threshold is too low and the

process too rigid (often involving several design review panels prior to an application proceeding to determination) which has frustrated sites coming forward. It is therefore imperative that the Council clearly sets out more information on how design review panels will operate in order to make the policy effective.

Policy T4 – Electric Vehicle Charging

Policy T4 is not considered to be sound as it is not justified and not consistent with national policy for the following reasons:

60. This policy sets out requirements for electric vehicle charging for new development. However, the requirements for electric vehicle charging infrastructure are already clearly set out in Part S of Building Regulations. The Government is clear that this is the standard which should be followed and there is no mechanism for going over and above this in the plan-making system.
61. As such, this policy is superfluous and in line with paragraph 16 of the NPPF, should be deleted.

Policy CO5 - Securing Educational Places through New Residential Development

Policy CO5 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

62. This policy states that for major development of 10 dwellings or more, where demand resulting from a residential development will create or exacerbate a shortfall in the number of local school places, the Council will seek to secure new and or improved education facilities.
63. The HBF agrees that new development should mitigate its own impact. The PPG sets out that plan makers and the education authority need to work collaboratively to identify which schools are likely to expand and where new schools will be needed as a result of planned growth. It goes on to highlight that it is important that costs and land requirements for education provision are known to inform site typologies and site-specific viability assessments (Reference ID: 10-029-20190509).
64. It is therefore considered that the policy or Reasoned Justification could be more pro-active in identifying where school expansion or new schools will be required in order to provide greater certainty for developers and for this to be better reflected in the Local Plan. This would ensure consistency with national policy.
65. The LPVA makes a general allowance for an education contribution which is included in an overall S106 cost assumption (£5,500 per plot). This appears to be derived from the per plot allowance used in the PFE DPD (£5,250 per plot) with an uplift included. It is unclear from this

work as to the breakdown of this figure and how much specifically is for education and how this figure is derived. As such, the HBF considers the approach to education contributions is not justified and the policy is not effective. Further information is required on where school expansion is likely to be needed over the plan period and how the costs of this have fed into the LPVA.

Policy CO6 - New Development and Health

Policy CO6 is not considered to be sound as it is not effective and not consistent with national policy for the following reasons:

66. This policy seeks alignment with PfE Policy JP-P6 which outlines that a Health Impact Assessment (HIA) will be required for all developments screened for an Environmental Impact Assessment (EIA), and other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing.
67. Given that a HIA is seen as a useful tool where impacts on health from a development proposal are anticipated to be 'significant' (see PPG Reference ID: 53-005-20190722), the Council's approach does appear to be pragmatic. However, to be effective, the policy should identify how those developments outside of those screened for EIA purposes will be assessed to establish whether a HIA is needed. Currently this is unclear and should be explained also with reference to the Integrated Assessment that accompanies the Local Plan which has already assessed health impacts (which would indicate that policy compliant schemes already address health issues).

Policy IN1 – Digital Infrastructure and Telecommunications

Policy IN1 is not considered to be sound as it is not justified and not consistent with national policy for the following reasons:

68. This policy sets out *inter alia* that all new residential developments should enable Fibre to the Premises (FTTP) broadband infrastructure. However, the requirement for broadband infrastructure for new residential developments is already set out in Part R of the building regulations. The Government is clear that this is the standard which should be followed and there is no mechanism for going over and above this in the plan-making system.
69. As such, this part of Policy IN1 is superfluous and in line with paragraph 16 of the NPPF, should be deleted.

Policy IN2 – Planning Obligations

Policy IN2 is not considered to be sound as it is not justified, not effective, not positively prepared and not consistent with national policy for the following reasons:

70. This policy states that in some cases, a site-specific viability assessment may be submitted where the need for such is evidenced by a change in circumstances which could not have been evident in the LPVA.
71. The NPPF is clear that plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the plan (paragraph 35). The LPVA shows significant viability challenges in many parts of the Borough, in particular showing development as unviable in Lower and Medium value areas on both greenfield and brownfield sites (see Tables 8.2, 8.3, 8.5 and 8.6, plus paragraph 9.9). The HBF also has concerns regarding deliverability in some of the Higher value areas given that the assumptions for policy and S106 costs are opaque and it is difficult to see how these have been calculated. It is therefore difficult to see how the approach is justified.
72. In light of this, the HBF is concerned that the Council is restricting the circumstances where it is possible to submit a site-specific viability assessment when it would seem inappropriate not to accept site specific viability assessments on all sites (given the viability issues identified). Whilst it would clearly be preferable in the first instance that the Local Plan sets policy requirements that would not undermine the viability of development sites coming forward (therefore saving time and money in bringing sites forward), it is clear that this is likely to be impractical and so a more flexible approach to site specific viability assessments is required so that the policy is effective and positively prepared.
73. Where the policy does currently allow for site specific viability assessments to be submitted, it is on the basis that a clawback mechanism will be incorporated into the legal agreement. This is to ensure that additional mitigation is provided if final development viability is better than anticipated in the initial viability assessment. If this is the case, for effectiveness, the Council should also include for allowing viability to be renegotiated where economic/market conditions have meant that the viability position has worsened. This will ensure the policy is appropriately balanced.

Policy IN3 – Delivering Social Value and Inclusion

Policy IN3 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

74. This policy states that all planning applications for major developments shall be supported by a Social Value Strategy.

75. Many residential developments will bring with them social benefits, through the provision of new more sustainable homes and potentially through the provision of affordable homes and other infrastructure provided through planning obligations. In September 2024 the HBF and Lichfields' produced a report on The Economic Footprint of House Building in England and Wales (https://www.hbf.co.uk/documents/13924/The_Economic_Footprint_of_Home_Building_in_England_and_Wales_report_-_September_2024.pdf). This document not only highlighted the economic benefits but also the social benefits of residential development. It highlighted that in 2023 house building created nearly 834,000 jobs, supported 6,000 apprentices, 900 graduates and 3,300 other trainees, provided £9.2bn of new affordable homes, £1.5bn provided for infrastructure including £677m on new and improved schools, £216m in open space, youth, community, sport and leisure facilities and an additional £6.8bn spent in local shops and services by residents of these new homes.
76. Paragraph 45 of the NPPF is clear that local planning authorities should only request supporting information that is relevant, necessary and material to the application in question. As this is the case, the HBF does not consider that it is necessary to include a policy requiring major proposals to provide details of what social value outcomes will be delivered and how this will be measured and assessed. This is an unnecessary burden to place on applicants and is unlikely to add value to a development, over and above the general benefits associated with development as set out above.
77. Furthermore, the HBF would also question the need for the measures in the Social Value Strategy to be conditioned on any planning permission granted. Whilst the criteria in the policy are generally understood, they are inherently subjective in nature and so it is unclear what would specifically need to be achieved so as to discharge the planning condition. The Council also needs to explain this in further detail and ensure the requirements are appropriately accounted for in the LPVA as this is not currently clear.
78. As such, the policy is not justified, effective or consistent with national policy and should be deleted.

Policy M1 – Monitoring Framework

Policy M1 is not considered to be sound as it is not positively prepared and not effective for the following reasons:

79. The Monitoring Framework of the Local Plan provides a selection of indicators and monitoring targets to monitor the performance of the policies. These are outlined after each section of the plan. There is also a Local Plan Monitoring Indicators table associated with Policy M1 (Table M1). Table M1 itself seeks to monitor indicators against the Integrated Assessment objectives

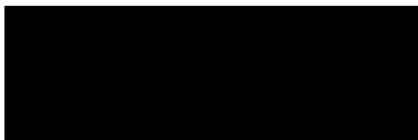
rather than specifically the policies of the Local Plan. It is therefore unclear on what basis the Local Plan is being monitored. For monitoring to be effective, this requires clarity from the Council.

80. Irrespective of this, the Monitoring Framework also needs to be more precise in terms of data sources for the indicators identified (ie. specifically where the data is to be found) and needs to be more definitive in terms of actions; identifying when, why and how actions will be taken to address any issues identified. Currently, Policy M1 is vague in terms of actions which are imprecise and heavily caveated (using 'may' instead of 'will'). This requires further explanation to ensure effectiveness and to allow the plan to be positively prepared.

Future Engagement

81. The HBF trusts that the Council will find these comments useful as it progresses its Local Plan to examination. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
82. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully,



Chris Martin BSc(Econ) MSc MA MRTPI
Regional Planning Manager (North West, North East and Yorkshire)
Home Builders Federation



From: The Big Oldham Convo Team [REDACTED]
Sent: 18 March 2026 10:03
To: [REDACTED]
Subject: Anonymous User completed Publication Plan Stage Representation Form

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

Title

Mr

First Name

David John

Last Name

MOORE

Job Title (where relevant)

Retired Engineering Contract manager

Address

[REDACTED]

Post Code

[REDACTED]

Telephone Number



Email Address (where relevant)



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

Policy

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

whole document

Do you consider the Local Plan is legally compliant?

No

Do you consider the Local Plan is Sound?

No

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

No

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 a planners dream .It comprises thousands of pages so incomprehensible that it is unbelievably complicated . there are so many alternatives , excepts, otherwise,s etc that almost any

option is possible. The plan should be a statement of what is going to happen, not what the planners want to happen. We all know where that takes us. Simplify the document.

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:

After Ten years work the document is un-workable . Reduce the content to half its size. Make it simple. Advertise and publicise what its about. Explain it to the public or is it secret. The section on Oldham Town Centre Park is totally out of date, Who wants to turn Oldham Town Centre into a park? What we want is shops, businesses, restaurants, leisure facilities ,theatres etc , that bring people into the town centre, spending and generating money for the towns finances. The biggest single mistake Oldham made was down to the Planners who let the Tram service run along Union Street instead of up Yorkshire Street into the heart of Oldham. This single mistake I feel cost Oldham its one chance to move into the 21 st Century. The tram should be re-routed number one priority. Name one business in Oldham that employs over 1000 people (Except OMBC) thats the type of businesses we need to attract to thrive, not our Vape shops, Barbers Shops, Nail Bars and fast food bars which is all we have at present. The plan is focused on Affordable Homes , build them everywhere and anywhere in there thousands but nowhere does it say where the people who live in them will work ,where their Children will go to school or how we will get more Doctors to come and work here in Oldham . The Plan should reflect the above and It should be a beacon of hope ,bu, unfortunately the planners have turned it into Oldhams Doom and Gloom Manual. We must prosper to achieve the aims of this Plan but it fails to offer any hope of this fundamental principle. We also need to integrate how, are we to progress if we don't integrate? Whats the plans answer to this critically crucial question?

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

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

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

I feel I have taken the trouble to look at this plan and raise some points that I consider to be important to the future of Oldham. I Don,t want to be sat in a miserable unattended park on top of Oldham, on a freezing cold summers day, thinking I should have done more when the Planners attempted to take over My Town AND DESTROYED ITS SOUL !

From: Graeme Moore [REDACTED]
Sent: 26 March 2026 23:52
To: SPI Consultations
Subject: Oldham Publication Place - Reg19 Consultation Submission
Attachments: Oldham Local Plan Reg 19 Representation - Design Scrutiny (inc Supporting Evidence).docx; Oldham Local Plan Reg 19 Representation - Parking Standards (inc Supporting Evidence).docx

Dear SPI,

I hope you're all well. Please find attached two Regulation 19 representations on the Oldham Local Plan Publication Plan.

The first concerns the absence of maximum car parking standards from the Publication Plan (Policy T3), and the second concerns the design policies (Policy D1) and, in particular, the removal of the Design Scrutiny policy that appeared in the Draft Plan.

I know how much effort will have been put in to getting the plan to publication stage, particularly in the current climate. These representations reflect my own professional views and are offered constructively, with the intention of strengthening the plan.

Kind regards,

Graeme Moore BA(hons), Dip TP, MA (Urban Design)
Town Planner / Urban Designer & avid Newcastle United supporter

[REDACTED]

Oldham Local Plan

Regulation 19 Representation

DESIGN POLICIES: ACHIEVING HIGH QUALITY DESIGN

Submitted by:

Graeme Moore BA (Hons) PgDip MA

[REDACTED]

March 2026

Contents

Basis of Representation	2
Introduction	3
National planning policy context	4
Design quality in England: the national evidence base	6
Design skills capacity in local planning authorities	8
Oldham's design governance capacity	10
The Draft Plan approach	12
The Publication Plan: a weakened response	14
Case studies: design quality in practice in Oldham	16
Broadbent Moss / Beal Valley (Bullcote Lane, FUL/355603/26)	16
Derker residential sites (FUL/350118/22)	18
Southlink, former Oldham Mumps Railway Station (FUL/355201/25)	19
Modification sought	21
Proposed Policy [D*]: Design Scrutiny	21
Proposed amendment to Policy D1	25

Basis of Representation

1. This representation is made by Graeme Moore BA (Hons) PgDip MA, a qualified town planner and urban designer. It concerns the design policies in Chapter 16 of the Oldham Local Plan: Development Management Policies and Designations Document (OLP) Publication Plan (January 2026).

2. I submit that the design policies in the Publication Plan are unsound. Specifically, I submit that the plan fails to meet the following tests of soundness set out in paragraph 35 of the National Planning Policy Framework (NPPF, December 2024):

- **Justified:** the plan is not the most appropriate strategy when considered against the reasonable alternatives, and is not based on proportionate evidence. The Draft Plan (December 2023) included a mandatory Design Scrutiny policy (Policy D3) with defined thresholds for design review and a requirement for Building for a Healthy Life assessment for schemes of 10 or more dwellings. The Publication Plan replaces this with a single permissive sentence. The Topic Paper explains that Draft Policy D3 was deleted primarily in response to industry representations raising proportionality concerns. I submit that those concerns are better addressed through well-defined thresholds — as the proposed modification sets out — than through deletion of the policy.
- **Effective:** without mandatory design scrutiny thresholds and a Building for Healthy Life requirement, the plan cannot deliver the high quality design outcomes it aspires to. The national evidence base — summarised in this representation — demonstrates that design quality in England, and particularly in the North West, is predominantly mediocre or poor; that this directly correlates with the absence of design skills and scrutiny capacity in local planning authorities; and that this structural weakness is particularly acute in unitary-type authorities such as Oldham. Permissive language cannot substitute for a mandatory policy framework.
- **Consistent with national policy:** paragraph 131 of the NPPF (December 2024) states that good design is a key aspect of sustainable development and paragraph 139 states that development of poor design should be refused. The Planning Practice Guidance requires local authorities to make design a transparent part of the planning process through robust provisions for design review. The Publication Plan's criteria-based approach, without mandatory scrutiny thresholds, falls below the standard national policy requires.

3. The evidence base set out in this representation is my own work. It draws on published national evidence from the Place Alliance, the Bartlett School of Planning at UCL, and the Ministry of Housing, Communities and Local Government (MHCLG).

4. The modification I seek is the reinstatement into the OLP of a standalone design scrutiny policy based on the Draft Plan's Policy D3, with defined mandatory thresholds for design review and a requirement for Building for a Healthy Life assessment, together with targeted strengthening of Policy D1 to address the absence of specific design standards for key development typologies.

Introduction

5. The design of new development is one of the most consequential planning decisions a local authority makes. Unlike conditions that can be varied or planning obligations that can be renegotiated, the physical form of a development is largely permanent: once built, it shapes the places where people live, work and move through for generations. Getting it right — or failing to — has lasting consequences for communities, for local character, and for the borough's ability to attract investment and regeneration.

6. This representation does not argue that Oldham's design policies are inadequate in intent. Policy D1 of the Publication Plan sets out a clear aspiration for high quality design and identifies a broad range of design principles that development is expected to meet. The problem is not the aspiration — it is the absence of a mechanism to deliver it. Without mandatory design scrutiny thresholds, without a requirement for Building for a Healthy Life assessment, and without in-house urban design or conservation expertise to assess compliance, the policy cannot be effective. Aspirational language and permissive criteria are unlikely, on their own, to deliver consistent design quality outcomes in the absence of a mandatory scrutiny mechanism.

7. This representation sets out the national evidence base demonstrating the scale of the design quality problem in England and the structural skills gap that underlies it; describes the specific design governance capacity of Oldham Council; explains what the Draft Plan's approach provided and what the Publication Plan has removed; and illustrates the consequences through three live case studies from within the borough. It concludes with a clearly defined modification.

8. The preparation of a Local Plan to Publication stage is a substantial undertaking, requiring years of sustained professional effort, stakeholder engagement, evidence gathering and political navigation — all against a backdrop of significant resource pressure across the local government sector. The officers of Oldham Council who have brought this plan to this stage deserve recognition for that work. The representations contained in this document are not intended as a criticism of those officers or of the council's commitment to good planning. They reflect my own professional judgment, formed through experience in development management, planning policy and urban design, that two aspects of the Publication Plan — on design quality and design governance — would benefit from the targeted modifications set out below. They are offered in that constructive spirit.

National planning policy context

9. The NPPF (December 2024) is emphatic on the importance of design quality. Section 12 (paragraphs 126–141) sets out a comprehensive framework for achieving well-designed places. Paragraph 131 states that 'good design is a key aspect of sustainable development, creating better places in which to live and work and helping make development acceptable to communities.' Paragraph 139 states that 'development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.'

10. Paragraph 132 requires plans to 'set out a clear design vision and expectations,' and to 'identify the special qualities and local character of an area and use these to guide decisions about design.' Paragraph 137 underlines that 'design quality should be considered throughout the evolution and assessment of individual proposals.' These are not advisory provisions — they establish the design quality baseline against which planning decisions must be taken.

11. The National Planning Practice Guidance (PPG) on design states that 'local authorities should make design a more transparent and accessible part of the planning process through clear strategic and non-strategic policies in Local Plans and robust provisions for design review and community engagement.' The PPG specifically recognises that non-strategic policies can 'set out how other design tools are expected to be used in appropriate circumstances, such as design review.' The implication is clear: where a plan identifies design review as a tool, the policy should specify how and when it will be used.

12. The National Design Guide (MHCLG, 2019) sets out ten characteristics of good design and is referenced in the NPPF at paragraph 133. It is aimed explicitly at local authority planning officers and is intended to inform the assessment of development proposals. Its focus on context, identity, built form, movement, public spaces and the integration of uses goes beyond aesthetic considerations to address the fundamental qualities that make places work well for the people who use them.

13. The National Model Design Code (MHCLG, 2021) sets a baseline standard of quality and practice which local planning authorities are expected to take into account when developing local design codes and guides and when determining planning applications. It addresses the layout of new development, the design of facades and landscaping, the environmental performance of buildings and places, and the requirement for developments to reflect local vernacular, heritage and materials.

14. Places for Everyone Policy JP-P1 'Sustainable Places' states the ambition to become 'one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places.' Policy JP-S1 'Sustainable Development' requires development to 'maximise its economic, social and environmental benefits simultaneously' and 'actively seek opportunities to secure net gains across each of the different objectives.' The design quality of new development is a direct expression of whether these strategic objectives are being met.

15. The Planning and Infrastructure Bill (2025), currently before Parliament, includes provisions to require mandatory training for planning committee members and to address design skills in local planning departments. The debate around the Bill has drawn directly on the MHCLG capacity and skills survey evidence and the Place Alliance research, and reflects a broad cross-party recognition that the design skills gap in local authorities is a structural

problem requiring structural solutions. The OLP, as a plan that will guide development to 2039, should reflect this national direction of travel rather than move against it.

16. The design quality of new residential development is not merely an aesthetic concern — it is a measurable public health determinant. A systematic review of the empirical evidence on place quality and health outcomes published in the *Journal of Urban Design* by Carmona (2019)¹ draws on hundreds of studies to establish that the qualities of the built environment generate direct and measurable value across health, social, economic and environmental outcomes. The evidence shows that walkable, well-designed neighbourhoods with active frontages, accessible open space and safe pedestrian routes are directly associated with increased physical activity, reduced obesity, lower rates of depression and anxiety, and reduced reliance on prescription medication including anti-depressants. The inverse relationship is equally evidenced: poor-quality environments — characterised by highway-facing frontages, inadequate pedestrian provision and car-dominated layouts — are associated with worse health outcomes across all these measures. This finding is consistent with an earlier synthesis by Frumkin (2002), published in *Public Health Reports*,² which established the causal chain between low-density, car-dependent development and sedentary behaviour, obesity, cardiovascular disease and premature mortality. Frumkin noted that in England 12% of trips are made on foot compared to 9% in the United States, and attributed the difference substantially to built environment design — demonstrating that planning and design policy choices produce measurable differences in population health at national scale. The most directly applicable evidence for an English planning context is provided by Sarkar, Webster and Gallacher (2017), published in *Lancet Planetary Health*,³ whose analysis of 419,562 UK Biobank adults across 22 UK cities identified a dose-response relationship between residential density and obesity. Below a threshold of approximately 1,800 residential units per km⁴, increments in density were positively associated with higher BMI and increased obesity risk; above that threshold, density had a protective effect. The authors explicitly noted that policies inhibiting suburban densification risk inhibiting the conversion of suburbs into healthier places to live.

17. These findings are directly applicable to the Oldham context. Oldham is among the most deprived local authority areas in England, with above-average rates of chronic disease, obesity and sedentary behaviour — precisely the population that the research evidence identifies as most exposed to the health consequences of poor-quality, low-density, car-dependent development. The Housing Design Audit found that less affluent communities are ten times more likely to receive poor design than more affluent ones. The Sarkar et al findings demonstrate that below-threshold residential density is independently associated with poorer health outcomes in UK populations. The Derker and Bullcote Lane case studies presented in this representation both illustrate residential development at Metrolink-adjacent locations delivering densities and design qualities that — measured against this evidence base — would be expected to generate worse health outcomes than those locations' accessibility would make possible. The absence of mandatory design scrutiny is not a minor procedural gap: it is a structural failure in the plan's ability to deliver the healthy, active environments that its own policy objectives require and that the peer-reviewed evidence base demonstrates are both achievable and necessary.

¹ Carmona M (2019). Place value: place quality and its impact on health, social, economic and environmental outcomes. *Journal of Urban Design*, 24(1), 1-48. DOI: 10.1080/13574809.2018.1472523.

² Frumkin H (2002). Urban sprawl and public health. *Public Health Reports*, 117(3), 201-217.

³ Sarkar C, Webster C, Gallacher J (2017). Association between adiposity outcomes and residential density: 419,562 UK Biobank participants. *Lancet Planetary Health*, 1(7), e277-e288.

⁴ Carmona M, Giordano V (2022). *Appealing Design*. Place Alliance / UCL Bartlett School of Planning.

Design quality in England: the national evidence base

18. The most comprehensive independent audit of housing design quality in England is the Housing Design Audit conducted by UCL's Place Alliance in association with CPRE (Carmona et al., 2020).⁵ The audit evaluated 142 large-scale housing-led development projects built across England between 2014 and 2019 against seventeen design considerations in four categories — environment and community; place character; streets, parking and pedestrian experience; and detailed design and management. The findings are significant.

19. Nationally, 75% of audited schemes were rated 'mediocre' or 'poor.' One in five should have been refused outright as their design was contrary to advice in the National Planning Policy Framework. A further 54% should not have been granted permission without significant improvements to their design. The national average score across all schemes was 3.12 out of a maximum of 5 — a solidly mediocre rating. The audit concluded that 'poor' and even 'mediocre' design is not sustainable and falls foul of the NPPF's presumption in favour of sustainable development.

20. The regional picture is uneven, and the North West's position within it is significant. The most improved regions were the West Midlands, the South East and Greater London. The audit's own summary notes that 'if these three best performing regions are stripped out, then the small national gain in housing design quality largely disappears.' The North West was not among the best performing regions — 14 schemes were audited in the region, and the report's Appealing Design study (Carmona et al., 2022)⁶ makes the North West's position explicit.

21. The Appealing Design study examined 32 planning appeals determined on design grounds following the 2021 revisions to the NPPF. The Planning Inspectorate is now three times more likely to back local authority design refusals than before those revisions. However, of the 32 appeals examined, 26 were in London or the South East, with only three in the North. The study characterised this as 'a particular reluctance to challenge design outside of London and the South-east' and directly linked it to 'findings in the Housing Design Audit for England that generally demonstrated poorer design outcomes outside of these regions and wider reports that planning in these regions has suffered from particularly deep funding and associated service cuts.'

22. The 2020 Housing Design Audit also found a ten-fold disparity in design outcomes by socio-economic context: less affluent communities are ten times more likely to receive poor design than more affluent ones. Oldham is one of the most deprived local authority areas in England — ranked among the most deprived deciles on multiple indices of deprivation. The structural link between deprivation, lower land values, and reduced developer investment in design quality is precisely the context in which robust planning policy and scrutiny tools matter most. It is also the context in which the temptation to prioritise housing numbers over design quality is strongest. Without mandatory scrutiny provisions, that temptation is harder to resist.

23. The audit's specific findings on the design qualities that most frequently fail are directly relevant to the Oldham context. The worst performing criteria nationally were those relating to

⁵ Carmona M, Giordano V, Oikonomou M (2020). A Housing Design Audit for England. Place Alliance / UCL Bartlett School of Planning / CPRE. January 2020.

streets, parking and pedestrian experience — developments dominated by access roads and the poor integration of car parking — and place character, with architecture that does not respond to the local context. Both of these failure modes are visible in the Oldham case studies discussed later in this representation. The audit's recommended response to local authorities is unambiguous: use proactive design codes and design review processes for all major housing schemes.

24. The 2022 National Housing Audit for England — a follow-up study — confirmed that whilst some improvement had occurred since the 2020 baseline, progress remained slow and uneven. The design of new housing environments in England remains 'mediocre or poor' for three quarters of audited projects. The fundamental dynamics identified in 2020 — including the correlation between low market value locations and poor design outcomes — have not materially changed.

Design skills capacity in local planning authorities

25. The Place Alliance's Design Deficit report (Carmona and Giordano, 2021)⁷ is the most recent comprehensive survey of urban design skills in English local planning authorities. Based on responses from 235 authorities — a 71% response rate — it found that urban design skills in local authorities remain insufficient to consistently deliver the national agenda on design quality. Its headline conclusion is that at current rates of recruitment it will take until 2077 for every local planning authority in England to have at least one urban design officer.

26. The specific findings of the Design Deficit are as follows: two fifths of local planning authorities have no access to urban design advice; almost two thirds have no landscape advice; three quarters have no architectural advice. On average, there are 1.7 design experts per local planning authority across England — and this average is itself skewed by a small number of larger authorities with substantial design teams. The median authority is significantly worse placed. Recruitment of urban design staff into local government is characterised as 'challenging' across the sector, principally because of an inability to compete with private sector salaries.

27. The Design Deficit report notes that design review panels are an increasingly important mechanism for covering the skills gap, with the use of panels continuing to rise. However, fewer than one in four local authorities uses a design review panel regularly (monthly or quarterly) and two in five use design review only rarely or not at all. The report makes a critical observation: advice from design review panels is often seen as a means to fill the design skills gap, rather than — as it should be — a means to supplement and challenge internal and external design advice. Where there is no internal expertise to interrogate and apply the panel's conclusions, the value of design review is substantially diminished.

28. The MHCLG Local Authority Planning Capacity and Capability Survey (2023)⁸ — the first government survey of its kind — found that 97% of local planning authorities report some planning skills gaps. The most common gaps were in ecology and biodiversity (72%), masterplanning and design codes (63%), and urban design and architecture (54%). The survey confirmed that skills gaps in design-related areas are among the most pervasive and most difficult to address across the sector.

29. The follow-up MHCLG survey (January 2025)⁹ updated these findings with a specific analysis by authority type. The findings for unitary authorities are particularly significant in the Oldham context. Unitary authorities are significantly more likely than average to report recruitment difficulties for heritage and conservation officers (30% compared to a national average of 12%) and for design and urban design officers (19% compared to a national average of 4%). Oldham, as a metropolitan borough operating as a unitary authority, falls squarely within this category. The survey findings directly predict the design governance context in which Oldham's planning service operates.

30. The RIBA's submission to the Planning and Infrastructure Bill (2025) drew directly on the MHCLG survey findings, noting that 54% of local authorities reported skills gaps in urban

⁷ Carmona M, Giordano V (2021). The Design Deficit. Place Alliance / UCL Bartlett School of Planning / Urban Design Group. July 2021.

⁸ MHCLG / Verian (2023). Local Authority Planning Capacity and Capability Survey 2023 Findings. Published January 2025.

⁹ MHCLG (2025). Local Authority Planning Capacity and Capability Survey 2025.

design and architecture and 60% of respondents to a Public Practice survey (2024) noted a lack of architecture, urban design and masterplanning skills within their local authority. The RIBA recommended that a skills development programme should include a route map for increasing design skills capacity in planning departments. This is the national context against which Oldham's Publication Plan is being submitted.

Oldham's design governance capacity

31. The national evidence summarised above predicts a general pattern of design skills deficiency in local planning authorities. In Oldham's case, that pattern is confirmed and sharpened by specific local circumstances. Oldham Metropolitan Borough Council currently has no Conservation Officer and no Urban Design Officer in post. This is not a temporary vacancy — it reflects the structural position of a planning department that has experienced sustained resource pressures over the past decade.

32. The consequences of this absence are significant. Without a Conservation Officer, the borough has no independent specialist to assess the design quality of proposals affecting the seventeen conservation areas within the borough, to provide pre-application advice on heritage and character matters, or to advise the Planning Committee on the significance of heritage assets and the impact of development upon them. Without an Urban Design Officer, the planning department has no in-house capacity to interrogate the design quality of major residential or mixed-use proposals, to assess compliance with national design guidance, or to identify and articulate design failures in a way that supports refusal. Planning officers assessing design quality are doing so without specialist support.

33. The Design Deficit report identifies this as a systemic risk. Where authorities have no internal design expertise, design issues are assessed by non-specialists who may lack the vocabulary, the methodological framework, or the confidence to challenge poor design proposals from experienced applicants and their consultants. The report notes that 'the sharing of posts, use of temporary staff and coverage of design issues by non-specialists still hides the true extent of the deficit.' Design review panels are often called upon to fill this gap — but where the conclusions of a review panel are not mandatory, and where the internal expertise to apply and enforce those conclusions is absent, the panel's value is compromised.

34. The Appealing Design study's finding that the North is particularly reluctant to challenge design takes on specific meaning in this context. Without specialist officers, without a mandatory scrutiny framework, and with the perpetual pressure to deliver housing numbers in a deprived borough where land values are low, the path of least resistance is to accept what is put forward. The Publication Plan's permissive design review language creates exactly the conditions in which that path is taken.

35. There is a compounding factor specific to the Oldham plan period that makes this more rather than less urgent. The Places for Everyone plan allocates several large strategic sites within or adjacent to Oldham for residential-led development, including Broadbent Moss and Beal Valley (up to 1,700 homes). The masterplan and design code SPD for Broadbent Moss was published simultaneously with the Reg 19 OLP. These are exactly the scale of development — 50 or more dwellings, with a masterplan framework — that Draft Policy D3 would have mandated for design review. The Publication Plan's approach means that whether design review happens at these strategic sites, and when, is entirely a matter of officer discretion.

The Draft Plan approach

36. The Draft Plan (December 2023) addressed the design quality challenge through a suite of seven dedicated policies — D1 through D7 — each targeted at specific aspects of design quality and governance. The approach reflected the council's own understanding of the problem, as set out in the Draft Plan Design Topic Paper, which acknowledged that the Housing Design Audit for England had found the North West to be 'generally delivering poor places below the national average.' The policy framework was an attempt to address that finding systematically.

37. Policy D1 set out a design-led approach to residential and mixed-use development. Policy D2 applied an equivalent approach to non-residential, commercial and employment development. Together these policies established a design quality baseline that applied across all development types.

38. Policy D3 — Design Scrutiny — was the mechanism through which the aspirations of D1 and D2 were to be delivered in practice. It established mandatory design review at defined thresholds, which I reproduce here:

Policy D3 – Design Scrutiny Applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a process of design scrutiny, if they:

1. include a residential component that exceeds 50 dwellings (cumulatively or singularly); or
2. have a density of 50 dwellings and above per hectare; or
3. include a building that is more than 18m in height; or
4. are a major development in a Conservation Area; or
5. are a dwelling proposed under the exceptional design quality rule in national planning policy; or
6. include the production of a site-wide urban design framework, masterplan and/or a design code.

The format of design reviews for any development should comply with the Design Council's guidance on review principles, process and management. In addition to the above, any development that includes 10 or more dwellings should use the Building for a Healthy Life tool at pre-application stage, submission stage and upon site completion, which will be secured via either a condition or where appropriate a requirement under a S106 Agreement.

39. The policy's reasoned justification was explicit about the rationale for mandatory thresholds. It noted the existence of 'a long established and independent Regional Design Review Panel that the council has used to test emerging proposals,' described the 'expert second opinion' the panel provides as 'invaluable,' and emphasised the importance of design review happening 'relatively early in the design process to help shape good quality proposals and avoid abortive work on schemes that may need to be substantially redesigned at a later stage.' Larger developments, or those on prominent sites, would be referred to the Panel at the applicant's expense, with costs recovered through pre-application fees.

40. The Building for a Healthy Life requirement for 10 or more dwellings was described as 'a useful tool for the council and local people to use to explore design options and assess development proposals.' It provided a consistent, publicly documented framework for evaluating the design quality of smaller residential schemes that fell below the design review thresholds — and, crucially, it required assessment at three stages: pre-application,

submission and completion. This staged approach was designed to prevent design quality from being agreed at pre-application stage and then degraded through subsequent revisions.

41. The remaining Draft Plan design policies addressed specific matters: Policy D4 addressed views, gateways and taller buildings; Policy D5 addressed advertisements and signage; Policy D6 addressed public realm; and Policy D7 addressed development within the curtilage of dwellinghouses. Together, these seven policies constituted a comprehensive design governance framework that addressed both the quality of individual buildings and the quality of the places they create.

The Publication Plan: a weakened response

42. The Publication Plan reduces the seven Draft Plan design policies to four: Policy D1 (Achieving High Quality Design), Policy D2 (Advertisements, Signage and Shop Fronts), Policy D3 (Creating a Better Public Realm in Oldham) and Policy D4 (Extensions and alterations to, and development within the curtilage of, a dwellinghouse). The entire mandatory design scrutiny framework — Policy D3 of the Draft Plan — has been removed. The Building for a Healthy Life requirement has been removed. The standalone Taller Buildings policy has been absorbed as three sub-criteria within D1. The separate residential and non-residential design policies have been merged into a single generic policy.

43. The entirety of what replaced the mandatory Draft Plan Policy D3 is a single sentence in the body of Publication Plan Policy D1, together with a footnote definition. The sentence reads: 'Developments that raise significant design issues will be expected, where appropriate, to undergo a local design review before any planning application is determined.' A footnote defines design review as 'an independent consideration of the planning application proposal undertaken by a panel of relevant professionals prior to the formal determination of the proposal by the Council, with all costs met by the applicant.'

44. This is a doubly permissive formulation. 'Developments that raise significant design issues' is undefined and entirely subjective — in the absence of thresholds, the judgment of whether a proposal raises significant design issues falls entirely to the planning officer assessing the application. As established above, Oldham has no urban design officer. That assessment will be made by a development management officer without specialist design qualifications, facing a development applicant with a professional design team. 'Where appropriate' adds a second layer of discretion on top of the first. There are no thresholds, no triggers, no mandatory timing requirement, no cost recovery mechanism referenced in the policy, and no requirement for design review to happen early in the process rather than before determination.

45. The contrast with Draft Policy D3 is significant. The Draft required design review for any residential development of more than 50 dwellings — unconditionally. It required review for any development at 50 dwellings per hectare or above — again, unconditionally. It required review for buildings over 18m, for major developments in conservation areas, and for any scheme accompanied by a masterplan. These are precisely the development types that carry the greatest risk of poor design outcomes and the greatest potential for long-lasting harm if that risk materialises. In Oldham, these are also exactly the types of development that are coming forward at strategic sites within the plan period.

46. The reasoned justification of Publication Plan Policy D1 refers to the Design Council's guidance on design review, and acknowledges that where required, the format of design reviews should have regard to that guidance. But the policy never specifies when they are required. The reference to guidance without a trigger or threshold is circular: it tells applicants how to conduct a design review if they have one, but provides no basis on which the council can require one.

47. The Publication Plan's Topic Paper on design (now available as part of the Reg 19 consultation documents) sets out the reasons for the removal of Draft Policy D3. It records that the policy received representations from Countryside Partnership / Vistry Group and the Home Builders Federation, both of whom expressed concern that mandatory design review should be used 'appropriately and in a proportionate manner.' It also records that Historic

England raised a specific technical concern: the definition of 'major development in a Conservation Area' in Draft D3 was unclear. The council's response to all three representations was identical: 'Draft Plan Policy D3 Design Scrutiny has been deleted.'

48. I submit that this response is disproportionate to the concerns raised. Historic England's concern was narrow and technical — the definition of a specific threshold was unclear. The appropriate remedy was to tighten that definition, not to delete the policy. The concerns raised by Countryside Partnership / Vistry Group and the Home Builders Federation relate to proportionality in the application of design review — legitimate considerations that are directly addressed by the clear, defined thresholds set out in the proposed modification. A threshold-based policy with well-defined triggers is inherently proportionate: it applies in defined circumstances, at the applicant's cost, and at an early stage when review can be constructive rather than disruptive. Removing the policy entirely to address a proportionality concern produces the inverse of a proportionate outcome.

49. It is also relevant to note which consultees were satisfied with the amendments. The Topic Paper records that the council met with Historic England, United Utilities, National Highways and TfGM, and that all parties were satisfied with the amendments to Policy D1. These are highway, heritage infrastructure and statutory utility bodies. None of them is a design quality body. No design organisation — not Places Matter, not the RIBA, not the Urban Design Group, not the Place Alliance — appears among the consultees recorded as satisfied with the removal of the mandatory scrutiny framework. The national design quality evidence base, which is directly referenced in the council's own Draft Plan Design Topic Paper, was not apparently reconsidered in reaching the decision to remove Policy D3.

Case studies: design quality in practice in Oldham

50. The national evidence base establishes the structural conditions under which poor design is likely to occur: a deprived borough; no in-house urban design expertise; permissive rather than mandatory design review; low market values that reduce developer incentive to invest in design. The two case studies below demonstrate that these conditions are already producing poor design outcomes in Oldham, and that the policy gap the Publication Plan perpetuates is not a theoretical risk — it is already having real consequences.

Broadbent Moss / Beal Valley — Land South of Bullcote Lane (FUL/355603/26)

51. The Broadbent Moss and Beal Valley strategic allocations (PfE sites JPA10 and JPA12) are among the most significant housing allocations in the Oldham plan period, with capacity for up to 1,700 new homes. The entire allocation sits within 800 metres of the proposed Cop Road Metrolink stop — making it one of the most accessible development sites in the borough. The justification for removing the land from the Greater Manchester Green Belt rests on its Metrolink accessibility. The design quality of this site therefore directly determines whether that planning justification is realised in practice.

52. The first planning application at the allocation — FUL/355603/26, submitted by Kellen Homes in February 2026 for 248 dwellings at Land South of Bullcote Lane — illustrates the problem precisely. The scheme proposes predominantly 2-storey semi-detached and detached housing on parcels ranging from 42 to 57 dwellings per hectare (DPH). This is the density range at which the Draft Plan's Policy D3 would have mandated design review — threshold 2 (density of 50 DPH or above) applies to at least the higher-density parcels, and threshold 1 (residential component exceeding 50 dwellings) applies to the whole scheme.

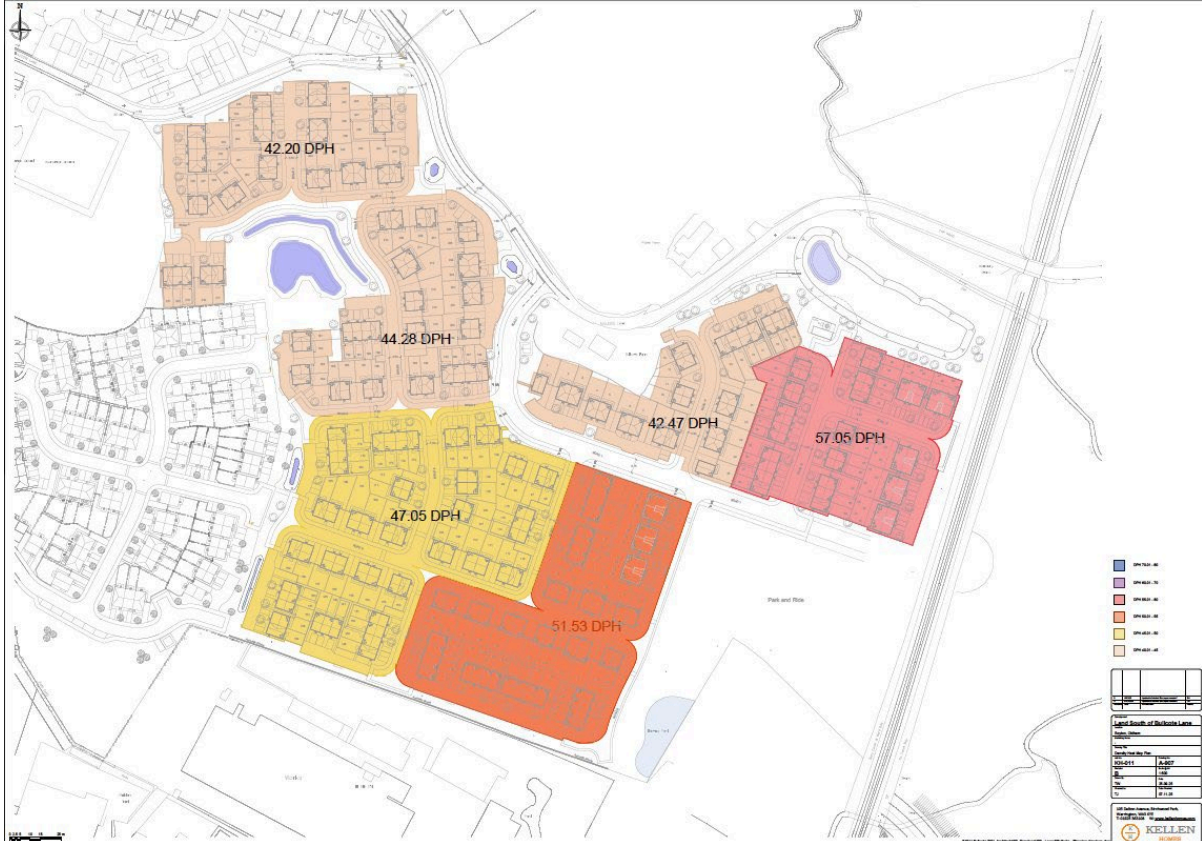
Figure 1: Site layout — Land South of Bullcote Lane (FUL/355603/26, drawing no. A-101)



Figure 2: Full site layout with schedule of areas — Land South of Bullcote Lane (FUL/355603/26, drawing no. A-100)



Figure 3: Density plan showing development parcels — Land South of Bullcote Lane (FUL/355603/26, drawing no. A-007)



53. The masterplan and design code SPD for the Broadbent Moss and Beal Valley allocation, which was published for consultation simultaneously with the Reg 19 OLP, sets out a design framework for the site. However, the SPD cannot substitute for a policy-level requirement for design review. SPDs cannot impose requirements that go beyond the development plan policy framework; the design governance mechanism must be embedded in the local plan itself. In the absence of mandatory design review thresholds in Policy D1, the SPD's design ambitions are aspirational rather than enforceable.

54. The design of the Kellen Homes application — car-dominated, low-density, conventional housebuilder product directly adjacent to a Metrolink stop — is precisely the type of outcome the Housing Design Audit identified as most common and most harmful. A site anchored by public transport investment, capable of supporting significantly higher density and more sustainable forms of development, is proposing a layout that could be located anywhere in suburban England and that takes no particular design cues from its context, its topography, or its Metrolink adjacency. This is not a criticism of the applicant — it is a description of what happens when planning policy provides no mandatory design governance framework for major strategic sites.

Derker residential sites (FUL/350118/22)

55. The Derker residential sites — four cleared parcels at Cromford Street, London Road, Evelyn Street and Abbotsford Road — were approved for 132 dwellings in April 2024. The application was approved unanimously at Planning Committee. The Derker Metrolink stop is immediately adjacent to the Cromford Street parcel and within 400–600 metres of the others.

56. The scheme delivers predominantly 2-storey semi-detached and mews-style housing at densities of between 28 and 52 DPH — well below the SHLAA's own identified capacity and the densities that PfE JP-H4 requires at locations of high public transport accessibility. The council's own pre-application design brief referenced the PfE density policy but qualified it by saying density should be 'suitable for the location taking into account market considerations' — a formulation that, in the absence of a mandatory design scrutiny framework, allowed market considerations to take precedence over the policy expectation.

57. Under Draft Plan Policy D3, this application would have triggered mandatory design review at threshold 1 (residential component exceeding 50 dwellings — the total is 132), and several individual parcels would have approached threshold 2 (50 DPH). The mandatory Building for a Healthy Life requirement would also have applied to all four parcels as they each contain more than 10 dwellings. None of these requirements applied because the application was submitted under the existing plan, but the scenario illustrates exactly the type of case for which Draft Policy D3 was designed: a major residential scheme at a highly accessible location, with significant potential to deliver a high-quality, higher-density urban environment, where the outcome instead reflects conventional low-density housebuilder assumptions.

Figure 4: Detailed site layout — Derker Residential Sites (FUL/350118/22)



58. The Derker case is particularly instructive because the Design and Access Statement does not identify design review as having taken place, and there is no indication that Building for a Healthy Life was used at any stage. The scheme was assessed by planning officers without specialist urban design support. The result is a development that — however acceptable it may be against the adopted policies in force — represents a significant missed opportunity at a Metrolink-accessible location that the SHLAA identified as capable of supporting 200 homes at higher densities than those approved.

59. Both case studies illustrate the same structural challenge: in the absence of mandatory design scrutiny thresholds, major residential development at accessible, regeneration-priority locations in Oldham is being assessed without specialist design expertise, and the outcomes — in terms of density and design quality — do not fully reflect what the location's accessibility and the plan's own ambitions suggest is achievable. A mandatory threshold-based approach is better placed to address this than permissive criteria.

Southlink, former Oldham Mumps Railway Station (FUL/355201/25)

60. The third case study is the most direct illustration of what the removal of mandatory design scrutiny means in practice, because the specific design failings it illustrates are precisely those that Draft Plan Policies D1 and D3 were designed to prevent. The Southlink application (FUL/355201/25), submitted by Vistry Group in October 2025 for 147 dwellings on the former Oldham Mumps railway station site, is a scheme that by any measure should have triggered mandatory design review under Draft Policy D3: it comprises 147 dwellings (far above the 50-dwelling threshold), includes three apartment blocks of up to four storeys (above the 18m threshold only narrowly, but clearly within the spirit of the scrutiny requirement), and the site lies within 400 metres of Oldham Mumps Metrolink stop and on the edge of Oldham Town Centre.

61. The design concerns raised in a third-party representation on the revised submission illustrate the value of early design-led scrutiny on complex, accessible brownfield town centre sites. Several of those concerns relate directly to matters that the Draft Plan's Policy D1 specifically addressed.

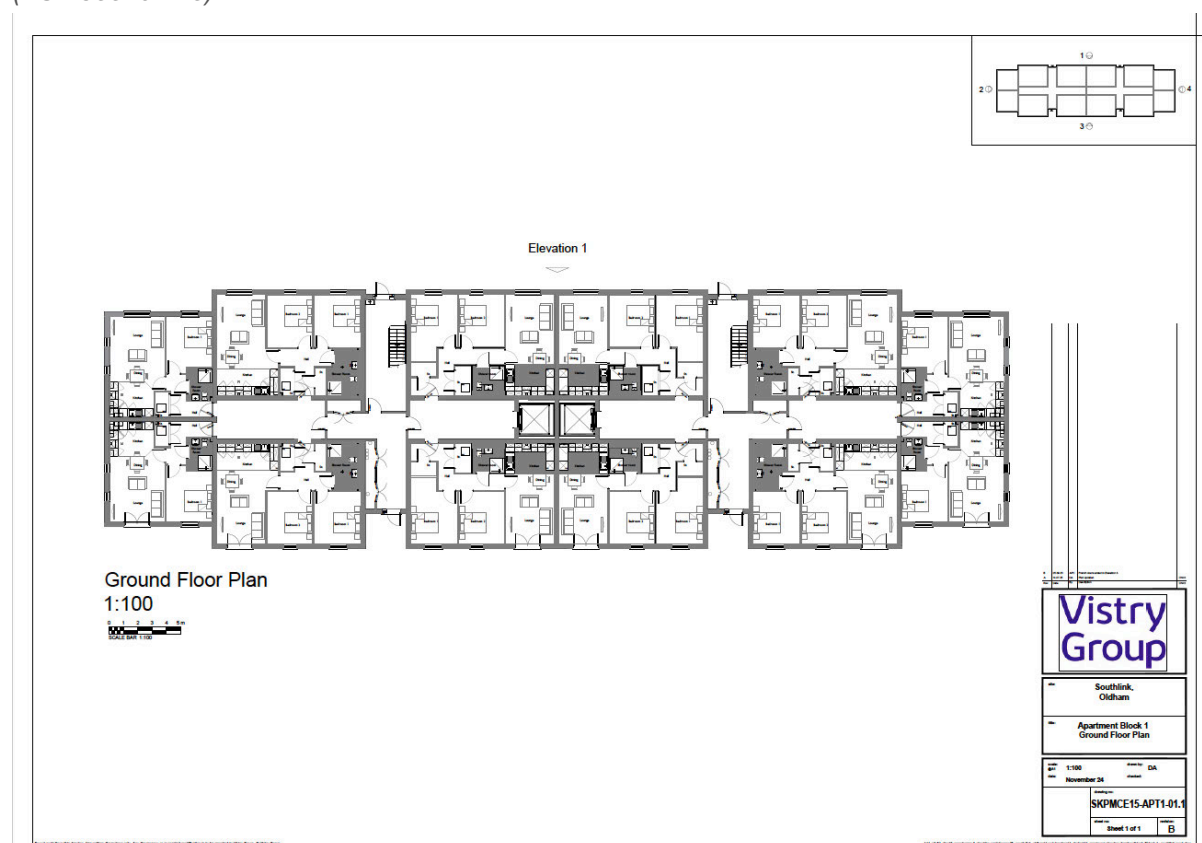
62. Density and land efficiency. The scheme delivers 147 dwellings at approximately 35 dwellings per hectare. The SHLAA identified the site's potential capacity at 52 DPH; PfE Policy JP-H4 sets minimum density expectations significantly higher than this for Metrolink-adjacent, town centre locations. The application's Design and Access Statement provides limited evidence of alternative massing studies, perimeter block testing, stepped-height responses or viability sensitivity analysis to demonstrate that higher densities were tested and found undeliverable. There is limited evidence of iterative, design-led exploration of site capacity. Under Draft Policy D3, mandatory design review at threshold 1 (more than 50 dwellings) would have required this design-led iteration to be evidenced before submission — placing the burden of proof on the applicant rather than the planning officer.

Figure 5: Detailed site layout – demonstrating the lack of passive surveillance on the active travel corridor running through the site. Dwellings face away from the active travel corridor, with rear gardens backing on to it. Oldham Mumps Metrolink stop is located within 400m to the north, which demonstrates the sites accessibility and opportunity to create a higher density development — Oldham Southlink Application (FUL/355201/25)



63. Single-aspect apartments and inequitable amenity. The apartment blocks include units facing Oldham Way (the A62 dual carriageway). The Environmental Noise Assessment submitted with the application acknowledges that these apartments face materially worse environmental conditions — higher noise levels, poorer air quality, reduced daylight. No meaningful redesign to address this through orientation, broken massing or dual-aspect layouts has been undertaken, despite the scheme demonstrating elsewhere (in the articulation of Block 3) that alternative configurations are achievable. This is precisely the issue that Draft Plan Policy D1 addressed through its requirement to 'ensure buildings and spaces are designed in a way to be inclusive to different users' and to 'ensure that site layout, orientation, design, and where applicable, common spaces provide privacy, adequate daylight and active frontages.' The Publication Plan's Policy D1 retains these aspirations in identical terms — but without mandatory design review, the mechanism for testing whether they are met before a scheme is submitted has been removed.

Figure 6: Detailed floorplans showing single aspect, north facing apartments which do not benefit from a balcony or demonstrate adequate daylight provision — Oldham Southlink Application (FUL/355201/25)



64. Passive surveillance and safety. The scheme consistently turns rear garden boundaries and defensive close-board fencing towards the cycleway and public open space adjacent to the site. This is the inverse of good urban design practice: well-designed residential neighbourhoods normally orient active frontages, windows and front doors towards public routes, providing natural surveillance. A Crime Impact Statement was submitted to mitigate the absence of passive surveillance — but mitigation is not design. The layout treats the cycleway and public open space as a boundary condition to be secured against, rather than a structuring element of the neighbourhood. Draft Policy D1 required development to 'ensure buildings and spaces are designed in a way to be inclusive to different users' and 'ensure that the design and layout minimises actual and perceived opportunities for crime.' A mandatory

pre-application design review, had one been required, would almost certainly have identified and challenged this layout approach before it was submitted — and before the investment of time and money that has now been committed to it.

Figure 7: Extract from site plan detailing the lack of passive surveillance of the cycleway running through the site, with dwellings backing on to the cycleway and no natural surveillance. Single aspect, north facing apartments are also shown adjacent to the A62 Oldham Way — Oldham Southlink Application (FUL/355201/25)



65. Building for a Healthy Life self-assessment. The applicant's self-assessment claims 12 'Green' scores under the Building for a Healthy Life framework — the maximum achievable, equivalent to a 'perfect' rating. An independent assessment of the scheme against the same criteria, drawing on the submitted drawings, identifies a realistic score of between 3 and 5 Greens, with 3 to 5 Red ratings and 4 to 6 Amber ratings. The specific categories the applicant awarded Green but which independent assessment suggests are Amber or Red include: public space (poorly located beside the A62, unoverlooked, no provision for children beyond a trim trail); passive surveillance (rear gardens and defensive fencing face the public route); and equitable apartment amenity (north-facing units on Oldham Way facing acknowledged worse environmental conditions). The Draft Plan's Policy D3 required Building for a Healthy Life assessment at pre-application stage, submission stage and completion, secured by condition or S106. Had that requirement been in force, the independence and credibility of the BfHL assessment would have been tested at pre-application stage — before the scheme was committed to a fixed layout.

66. The Southlink case study is significant beyond the specific failings it illustrates. This is Oldham's most prominent affordable housing scheme in the current plan period: 147 homes, 100% affordable, on the former Mumps railway station site, directly adjacent to Metrolink, supported by GMCA and Homes England grant, and described by Oldham Council's own leader as being about 'doing the right thing.' The representation is not intended as a criticism of any individual involved in this scheme. It is an illustration of a structural policy gap: without

mandatory design scrutiny thresholds, even well-resourced, high-profile schemes with strong political support can proceed without the early design-led iteration that would identify and resolve fundamental design issues before the layout is fixed. Mandatory thresholds would provide the framework within which that iteration takes place as a matter of course.

Modification sought

67. For the reasons set out in this representation, I submit that the design policies in the Publication Plan are unsound in the absence of a mandatory design scrutiny mechanism. I invite the Inspector to recommend the following main modification:

68. The insertion into the OLP of a standalone Design Scrutiny policy in substantially the following terms. The justification for each element follows the policy text, including how it addresses specific gaming risks and is grounded in the case study evidence.

Proposed Policy [D*]: Design Scrutiny

POLICY [D*]: DESIGN SCRUTINY

All development proposals comprising 10 or more dwellings must use the Building for a Healthy Life assessment tool at pre-application stage and at planning application stage. The assessment must be independently verified; applicant self-assessment alone will not be accepted. Compliance at application stage will be secured by planning condition, with assessment at completion secured through a condition or S106 agreement as appropriate.

Development proposals must have undergone at least one independent design review, conducted by the Greater Manchester Regional Design Review Panel (currently operated by Places Matter!) or an equivalent body of equivalent standing, at pre-application stage, if they:

1. include a residential component that exceeds 50 dwellings, whether singularly or cumulatively. For the purposes of this threshold, 'cumulatively' means dwellings forming part of the same development, within the same site allocation, or proposed by the same applicant or a related entity within any five-year rolling period on the same or an immediately adjacent site;
2. include any residential development at a density of 35 dwellings per hectare or above;
3. include any flatted development (Use Class C3) comprising 10 or more units;
4. include a building that is 18 metres or more in height, or five storeys or more above ground level;
5. are a major development (10 or more dwellings) within a Conservation Area, or affecting the setting of a listed building or scheduled monument;
6. are a dwelling proposed under the exceptional design quality rule in national planning policy;
7. include the production of a site-wide urban design framework, masterplan and/or design code; or
8. are a major development (10 or more dwellings) within a town or district centre as defined on the Policies Map, or within an Area Type A location as defined in the parking standards policy.

Design review must take place at pre-application stage, sufficiently early in the design process to allow its conclusions to materially influence the layout, massing, density and design quality of the proposal before these have been substantially fixed. Design review conducted after the scheme has been substantially fixed will not satisfy this requirement. All costs of the design review shall be met by the applicant and recovered through the Council's pre-application charging schedule. Where a development proposal falls within the mandatory thresholds above and independent design review at pre-application stage has not taken place, this will be a material consideration weighing against the grant of planning permission.

Justification for each element of the proposed policy

Building for a Healthy Life: all major applications, independently verified

69. Requiring BfHL assessment for all major residential applications (10 or more dwellings), with independent verification, is directly justified by the Southlink case study (FUL/355201/25). The applicant self-assessed 12 Green scores — the maximum possible — for a scheme where independent review of the submitted drawings suggests a materially lower score, with significant concerns around passive surveillance, apartment amenity, public realm design and child-friendly provision. This disparity illustrates why self-assessment alone is insufficient. Requiring independent verification addresses this. The cost is met by the applicant; the council does not commission or pay for it. The three-stage requirement — pre-application, submission and completion — reflects the Draft Plan's approach and guards against the degradation of scheme quality between pre-application discussions and final delivery.

50-dwelling threshold: anti-phasing definition

70. The anti-phasing definition of 'cumulatively' addresses the most obvious gaming risk in the Draft Policy D3 wording. Without a definition, a promoter with a 200-dwelling allocation could submit four phases of 49 dwellings and argue each is independent. The Broadbent Moss / Beal Valley allocation — up to 1,700 homes — illustrates this risk directly. The first phase (FUL/355603/26, 248 dwellings) triggers threshold 1 regardless, but as the site is progressively developed by different housebuilders on separate plots, individual phases could be structured to avoid the threshold without the anti-phasing definition. The three-part test proposed — same development, same allocation, or same applicant or related entity within five years on the same or adjacent site — is drawn from established principles applied in EIA screening decisions about whether related applications constitute a single project.

35 dph density threshold: alignment with JP-H4 and closing the design quality band

71. Lowering the density threshold from 50 dph to 35 dph is the most significant change from the Draft Plan's Policy D3. The justification has three elements. First, alignment with JP-H4: Places for Everyone Policy JP-H4 sets 35 dph as the minimum density requirement for residential development outside the Metrolink catchment. Any development meeting the basic JP-H4 standard anywhere in the borough is at 35 dph or above. A scrutiny threshold at 50 dph therefore allows the entire 35 to 49 dph band to escape mandatory review — the density range at which the national evidence base shows design quality to be most variable and where the absence of scrutiny has the greatest effect.

72. Second, the Derker and Southlink case studies both illustrate the 35 to 49 dph blind spot. At Derker (FUL/350118/22), several parcels delivered densities in the 35 to 49 range, below the 50 dph trigger. At Southlink (FUL/355201/25), the scheme delivers approximately 35 dph — at the JP-H4 floor but below the Draft Policy D3 density threshold. Both were approved without design review; both illustrate design quality failures in this density band.

73. Third, the 35 dph alignment creates a policy lock that makes gaming harder. A developer avoiding the scrutiny threshold by designing to 34 dph simultaneously falls below the JP-H4 minimum density requirement, creating a separate policy conflict requiring robust justification. Avoiding design scrutiny on density grounds therefore means accepting a JP-H4 conflict. The two policies reinforce each other and eliminate the gap between them.

Flatted development threshold (10+ units)

74. The flatted development threshold addresses a gap that Southlink exposed. Single-aspect flatted development can occur at scales well below 50 dwellings and at site densities that do not trigger the 35 dph threshold: a 20-unit scheme on a 0.6 hectare site delivers 33 dph, below both thresholds. Yet the design quality risks of flatted development — single-aspect layouts, inadequate natural light, noise exposure, passive surveillance failures — are at least as significant as those in larger housing schemes and in many cases more acute. Making any major flatted application (10+ units) subject to mandatory design review regardless of density ensures that no major apartment development in Oldham escapes scrutiny. The Southlink case, caught by thresholds 1, 2 and 8, would also have been caught by threshold 3 independently — which is the intended effect.

Town centre and Area Type A locations

75. The town centre and Area Type A trigger ensures that the highest-quality design is required precisely where the plan's regeneration ambitions are most directly expressed. Standard suburban typologies are most inappropriate and most harmful in town centre and Metrolink-adjacent locations. Southlink — on the edge of Oldham Town Centre, 400 metres from Oldham Mumps Metrolink — is the direct illustration. Under the proposed modification, threshold 8 alone would have made design review mandatory for that scheme. The redundancy of multiple thresholds catching the same scheme is intentional: it prevents any argument that a particular threshold is not technically triggered.

Pre-application timing requirement

76. Design review after a scheme is substantially fixed is less likely to produce meaningful improvements to layout, massing or density. Both the Derker and Southlink applications include Design and Access Statements that provide limited evidence of iterative, design-led exploration of alternative layouts or densities. Requiring review to happen sufficiently early to materially influence layout, massing, density and design quality — rather than simply before determination — gives the policy the temporal teeth it needs. A review at the point of application, after the scheme has been designed, built into tender and signed off by funders, cannot achieve what the policy requires.

Places Matter named as the panel

77. Naming Places Matter explicitly prevents the policy being satisfied by lesser processes, internal peer review, a desk-based assessment, or a panel constituted by the applicant's own consultants. The council's Draft Plan Design Topic Paper described the Regional Design Review Panel as providing an 'invaluable expert second opinion' and noted its 'long established and independent' character. That panel is Places Matter. Naming it sets the standard and makes substitution with inferior processes much harder to argue at application or examination stage.

Design review as Urban Design and Conservation Officer function

78. In the absence of a dedicated Urban Design Officer and Conservation Officer at Oldham Council, the design review panel provides the specialist input those officers would otherwise supply. The MHCLG survey (2025) found that unitary-type authorities report recruitment difficulties for urban design officers at nearly five times the national average (19% vs 4%). In a borough with Oldham's land values and resource pressures — and against a background of sector-wide competition from private sector employers for design professionals, sustained in-house design capacity may take considerable time to build. Making the panel's function explicit in the policy ensures that the current absence of dedicated officer expertise does not result in an absence of specialist input into planning decisions. This is a pragmatic

and durable response to a structural challenge that the national evidence identifies as common to many authorities in Oldham's position.

Alternative Modification (if thresholds considered too complex)

80. If the Inspector considers the full threshold-based approach in the Preferred Modification above to be disproportionate or administratively complex, the following simplified alternative would achieve the core objective of ensuring mandatory design scrutiny for the developments where it matters most.

POLICY [D*]: DESIGN SCRUTINY (SIMPLIFIED ALTERNATIVE)

All major development proposals comprising 10 or more dwellings must use the Building for a Healthy Life assessment tool at pre-application stage and at planning application stage. The assessment must be independently verified; applicant self-assessment alone will not be accepted. Compliance at application stage will be secured by planning condition, with assessment at completion secured through a condition or S106 agreement as appropriate.

In addition, development proposals must have undergone at least one independent design review, conducted by the Greater Manchester Regional Design Review Panel (currently operated by Places Matter!) or an equivalent body of equivalent standing, at pre-application stage, if they:

1. are located within a town or district centre as defined on the Policies Map, or within an Area Type A location as defined in the parking standards policy, and comprise 10 or more dwellings; or
2. comprise 50 or more dwellings anywhere in the borough, whether singularly or cumulatively (where 'cumulatively' means dwellings forming part of the same development, within the same site allocation, or proposed by the same applicant or a related entity within any five-year rolling period on the same or an immediately adjacent site); or
3. include any flatted development (Use Class C3) comprising 10 or more units.

Design review must take place at pre-application stage, sufficiently early in the design process to allow its conclusions to materially influence the layout, massing, density and design quality of the proposal before these have been substantially fixed. All costs of the design review shall be met by the applicant and recovered through the Council's pre-application charging schedule. Where a development proposal falls within the mandatory thresholds above and independent design review at pre-application stage has not taken place, this will be a material consideration weighing against the grant of planning permission.

79. The simplified alternative retains the three most important triggers: the town centre and Area Type A location trigger (ensuring no major housing scheme at the most accessible locations escapes scrutiny regardless of scale); the 50-dwelling threshold with anti-phasing definition (catching all strategic-scale schemes); and the flatted development threshold (addressing the specific typological risks illustrated by the Southlink case study). What it sacrifices relative to the preferred modification is the standalone 35 dph density trigger, the Conservation Area / listed building setting trigger, and the triggers for masterplans and exceptional design quality dwellings. These are genuine compromises — but the three retained triggers would catch the overwhelming majority of applications where design scrutiny adds most value, and the simplified structure is less vulnerable to proportionality objections from industry bodies.

80. In addition to the Design Scrutiny modification, the Publication Plan should be amended to reinstate the substantive requirements formerly contained within Draft Policies D1

and D2. These modifications restore policy effectiveness through targeted additions to the existing Policy D1 without introducing unnecessary complexity. The following subsections are proposed for insertion into Policy D1 of the Publication Plan. They reinstate specific design requirements from Draft Policies D1 and D2 that were not carried forward and that address matters of design quality not currently covered with sufficient specificity. They are proposed as additions to the existing policy criteria, not as replacements for them.

Proposed amendment to Policy D1: Achieving High Quality Design

MM1 — Residential development design requirements

81. Insert a new subsection within Policy D1 titled 'Residential Development,' in the following terms:

Residential Development

Residential development proposals should:

- a) demonstrate a design-led approach to site capacity, density and layout, informed by the character, grain, scale, constraints and opportunities of the surrounding area;
- b) ensure separation distances, building heights and massing reflect local character and provide appropriate levels of privacy, outlook and amenity;
- c) limit the use of single-aspect dwellings unless it can be clearly demonstrated that adequate daylight, sunlight, ventilation and thermal comfort can be achieved;
- d) provide private and/or communal amenity space that is functional, accessible, of an appropriate size, overlooked and well related to the dwellings it serves; and
- e) demonstrate how internal and external environments will support healthy living, including through access to daylight, avoidance of overheating, excessive noise and provision of usable outdoor space.

MM2 — Non-residential, commercial and employment development design requirements

82. Insert a new subsection within Policy D1 titled 'Non-Residential, Commercial and Employment Development,' in the following terms:

Non-Residential, Commercial and Employment Development

Non-residential development proposals should:

- a) respond positively to their context through appropriate scale, massing, form and architectural articulation;
- b) avoid large areas of blank or inactive frontage, particularly where development fronts streets or public spaces;
- c) ensure that parking, servicing and plant do not dominate the public realm and are appropriately screened and integrated into the overall design;
- d) carefully manage interfaces with residential and other sensitive uses, including through layout, orientation, buffering and material choices; and
- e) use materials and detailing appropriate to their setting, particularly where employment or commercial uses are located close to residential areas or heritage assets.

Justification for proposed additions to Policy D1

83. The proposed additions address two areas where the merger of Draft Policies D1 and D2 into a single Publication Plan policy has resulted in the loss of specific design quality requirements.

MM1 — Residential criteria

84. The five residential criteria cover matters that are either absent from or insufficiently specific in the Publication Plan's Policy D1. Criterion (a) — the design-led approach to site capacity — directly addresses the pattern identified in the Derker and Southlink case studies, where Design and Access Statements provided limited evidence of iterative design exploration and instead read as retrospective justifications of layouts arrived at through typological constraint. Requiring that density and layout are demonstrably informed by character, grain and constraints rather than applied formulaically provides officers with a clear policy basis on which to interrogate capacity assumptions.

85. Criterion (c) — limiting single-aspect dwellings — is the most direct response to the Southlink case study (FUL/355201/25). The Environmental Noise Assessment acknowledged that north-facing apartments on Oldham Way would experience materially worse conditions. No redesign was undertaken to address this through dual-aspect layouts, despite evidence that alternative configurations were achievable. Draft Policy D1 criterion 12 required that single-aspect dwellings be justified as the more appropriate design solution; this standard is absent from the Publication Plan. Criterion (c) reinstates it without prohibiting single-aspect development outright — it requires justification, which is the appropriate and proportionate standard.

86. Criteria (d) and (e) — amenity space and healthy living — address the absence from Publication Plan Policy D1 of the detailed communal and private amenity space requirements that appeared in Draft Policy D1 criteria 8 and 9. The public realm and amenity failings identified in the Southlink representation — inadequate communal provision, poor surveillance, public open space adjacent to a 50mph road without meaningful child-friendly provision — illustrate the practical consequences of this absence. These criteria provide a clear policy basis on which officers can require adequate amenity provision for flatted development at application stage.

MM2 — Non-residential criteria

87. The non-residential criteria address the loss of use-specific design requirements that resulted from the deletion of Draft Policy D2. These considerations are materially different from residential design issues and cannot be effectively addressed through a single generic policy. Criterion (b) — avoiding blank or inactive frontage — and criterion (c) — preventing parking and servicing from dominating the public realm — are the most commonly recurring design failures in employment and commercial development in Oldham, where many employment sites are located within or adjacent to existing residential areas. Criterion (d) — managing interfaces with residential uses — is directly relevant to this context and was explicitly addressed in Draft D2's reasoned justification, which noted that new employment buildings in residential areas should reflect the scale and character of those areas rather than impose industrial materials. These requirements are not recoverable from the generic criteria in the current Policy D1 and need to be stated explicitly.

Case study: Astley Business Park, Tyldesley, Wigan

88. The consequences of the absence of specific design requirements governing the relationship between major employment development and adjacent residential uses are already visible within Greater Manchester, and provide a direct illustration of why the MM2 modification is necessary. At Astley Business Park, Tyldesley, in the neighbouring Borough of Wigan (planning reference A/23/96226/MAJOR, approved June 2024), four logistics warehouses of 18 metres in height were approved immediately adjacent to the Henford Estate, a recently completed residential development of conventional two-storey housing.¹⁰ The four warehouse buildings total approximately 350,000 square feet and are available for operation 24 hours a day.

89. The planning permission was confirmed as lawful — Wigan Council and its independent auditors concluded that the application was processed in compliance with national policy and legal frameworks. The problem was not a failure of process but a failure of policy: the absence of specific design requirements governing scale, massing, the interface with residential uses and material choices for major employment development. The generic design policy framework in force in Wigan did not require applicants to demonstrate how the building's mass would be articulated to reduce its visual dominance, how its materials would respond to the residential character of the adjacent housing, or how the interface between the industrial and residential uses would be managed through layout and landscaping. These are precisely the matters that Draft Policy D2 addressed — and precisely the matters that the Publication Plan's merged, generic Policy D1 does not address with sufficient specificity.

90. The three photographs document the relationship between the approved warehouses and the adjacent residential development. They are included because they illustrate, more directly than any policy analysis can, what the deletion of Draft Plan Policy D2 and the adoption of a generic design policy framework risks permitting in Oldham: employment development that meets the minimum requirements of a criteria-based policy whilst causing lasting harm to the communities it is built alongside.

¹⁰ Wigan Metropolitan Borough Council (2024). Planning application A/23/96226/MAJOR: Astley Business Park, Astley Park Way, Tyldesley. Approved 11 June 2024. Independent Audit by Planning Officers Society Enterprises, December 2025.



Figure 8: View from a public footpath showing an 18-metre logistics warehouse immediately adjacent to the Henford Estate residential development. Photograph: G Moore, March 2026.



Figure 9: Distant view showing the warehouse roofline extending across the full width of the residential development. Photograph: G Moore, March 2026.



Figure 10: View from a residential street on the Henford Estate showing the warehouse elevation at the head of a cul-de-sac. Photograph: G Moore, March 2026.

Why the Proposed Modifications Would Make the Plan Sound

91. The Main Modifications set out above would address the identified soundness issues and ensure that the Plan is justified, effective and consistent with national policy, as required by paragraph 35 of the National Planning Policy Framework.

(a) Justified

92. The proposed modifications are supported by proportionate evidence. The Place Alliance Housing Design Audit (2020) found that 75% of new housing nationally is mediocre or poor in design quality, with less affluent communities ten times more likely to receive poor design than more affluent ones. The MHCLG Planning Capacity and Capability Surveys (2023 and 2025) document a structural and worsening urban design skills gap across local planning authorities nationally. In Oldham specifically, there is no dedicated Urban Design Officer or Conservation Officer. The three case studies presented in this representation (Derker, Bullcote Lane and Southlink) demonstrate that this skills gap is producing identifiable harm on the ground at accessible locations in the borough. This representation also draws on peer-reviewed evidence from Carmona (2019), Frumkin (2002) and Sarkar, Webster and Gallacher (2017) establishing the direct relationship between design quality, residential density and measurable public health outcomes in the UK population. The proposed modifications reinstate, in refined form, what the council's own Draft Plan already proposed and what the council's own draft evidence base at that stage supported. No evidence has been published at Publication stage to justify the removal of that approach. The modifications are therefore based on proportionate evidence and represent the most appropriate strategy when considered against the reasonable alternatives.

93. Each specific modification is individually justified. Policy [D*] reinstates the mandatory design review and BfHL assessment requirements that the Draft Plan contained, refined to

include a clearer threshold framework and an anti-phasing definition to prevent circumvention. MM1 restores five specific residential design criteria — separation distances, single-aspect dwelling justification, amenity space, healthy living and design-led density — that appeared in Draft Policy D1 and whose removal at Publication stage was not supported by any published evidence base. MM2 restores the non-residential and employment design criteria that appeared in Draft Policy D2, a deletion whose consequences are directly illustrated by the Astley Business Park case study (A/23/96226/MAJOR, Wigan, 2024), where an independent audit commissioned by Wigan Council found that a legally compliant approval process produced warehouses of 18 metres in height immediately adjacent to a residential estate — a consequence of a policy framework that lacked the specific criteria that Draft Policy D2 would have provided in Oldham.

(b) Effective

94. The proposed modifications would provide a clearer and more consistent basis for decision-making in accordance with NPPF paragraphs 130 to 135, which require planning policies to ensure that developments function well, are visually attractive, establish a strong sense of place, and deliver a high standard of amenity for existing and future users. To achieve these outcomes, policies must provide sufficient clarity to guide applicants and decision-makers. The modifications do this through three mechanisms.

95. First, Policy [D*] establishes clear, objective thresholds for mandatory design review. The threshold framework — incorporating triggers based on dwelling numbers, density, typology, height, heritage sensitivity, masterplanning and location — gives applicants predictable and advance notice of when design review is required, removes the discretion that the current Publication Plan policy relies upon, and provides the council with an enforceable basis on which to require compliance. The Building for a Healthy Life assessment requirement, independently verified, gives both applicants and decision-makers an objective, nationally recognised benchmark against which residential design quality can be measured at application stage and at completion. Where mandatory design review has not taken place, the policy establishes this as a material consideration weighing against the grant of permission — a formulation upheld at appeal and one that gives the council a legally defensible basis on which to resist non-compliant applications. In the absence of an Urban Design Officer or Conservation Officer, the design review panel conclusions serve as the specialist input that those posts would otherwise provide, and are to be given significant weight accordingly.

96. Second, the MM1 residential criteria and MM2 non-residential criteria each set out requirements expressed in terms capable of objective assessment at application stage and capable of being secured by planning condition or legal agreement. Criterion MM1(b) — separation distances — is a measurable spatial standard verifiable on submitted drawings. Criterion MM1(c) — limiting single-aspect dwellings — requires justification rather than prohibition, which is the appropriate and proportionate standard. Criterion MM2(d) — managing interfaces with residential uses — addresses the most critical design challenge at employment sites adjacent to housing and can be secured through conditions relating to materials, landscaping, lighting, hours and boundary treatment. These requirements improve certainty for applicants at the design stage, support consistent decision-making, and provide a more robust basis for defending design-related decisions at appeal.

97. Third, the simplified alternative modification — if preferred by the Inspector over the full threshold-based approach — retains the three triggers that capture the overwhelming majority of applications where design scrutiny adds most value (town centre and Area Type A locations; 50 or more dwellings; flatted development of 10 or more units), together with the

BfHL requirement for all major residential applications. It is therefore equally effective in operational terms, even if it sacrifices some of the coverage of the preferred modification.

(c) Consistent with national policy

98. The proposed modifications would strengthen the Plan's alignment with national policy across all three modifications.

99. Policy [D*] is consistent with NPPF paragraph 133, which states that local planning authorities should use design codes and design review arrangements and that design review should be used for significant development proposals. It is consistent with NPPF paragraph 135, which sets out the specific criteria for good design in residential development, including visual attractiveness, sympathy to local character, and the promotion of health and well-being. It is consistent with NPPG Design paragraph 005 (reference ID 26-005-20190723), which states that design review should be used for significant development and that its conclusions should be given substantial weight. It is consistent with NPPG Design paragraph 007 (reference ID 26-007-20190723), which identifies Building for a Healthy Life as an appropriate methodology for assessing residential design quality. It is consistent with the National Design Guide (2021), which identifies design review as a core element of the design governance framework for local planning authorities. The modification requires nothing that national policy and guidance does not already describe as good practice — it makes mandatory what national guidance recommends.

100. MM1 is consistent with NPPF paragraph 130(b), which requires planning decisions to ensure developments are sympathetic to local character and designed to be safe, inclusive and accessible; paragraph 130(f), which requires a high standard of amenity for existing and future users; and paragraphs 135(a) to (f), which set out the specific qualities of good design in residential development that the five MM1 criteria are directly designed to secure. The National Design Guide (2021) includes layout, scale, built form and public space as core design characteristics. Building for a Healthy Life categories 5 through 10 address directly the matters covered by MM1 criteria (b) through (e).

101. MM2 is consistent with NPPF paragraph 130(c), which requires planning decisions to ensure developments are sympathetic to local character and history including the surrounding built environment; paragraph 130(e), which requires attention to the connection between people and the built environment; and paragraph 135(e), which requires attention to the interface between new development and its surroundings including boundary treatments, lighting and noise. The National Design Guide (2021) establishes that the core design characteristics it identifies — including character, movement, public spaces and buildings — apply to all development types, not only residential. MM2 gives specific local policy expression to these nationally established expectations for non-residential development, which Publication Plan Policy D1 fails to do with sufficient specificity to be effective.

Summary

102. Overall, the proposed Main Modifications would provide a clearer and more robust policy framework for design quality across both residential and non-residential development; ensure that design quality is consistently secured through the development management process through the use of established, nationally recognised tools; align the Plan more closely with the specific requirements of NPPF paragraphs 130 to 135 and the associated national guidance; and address the specific, documented harm that the current policy

framework is producing at accessible locations in the borough. They represent a proportionate and effective means of addressing the identified soundness issues and would, if adopted, make the relevant parts of the Plan sound.

103. I would welcome the opportunity to engage with the council and the Inspector in the preparation of a statement of common ground on the design governance matters raised in this representation.

Footnotes

¹ Carmona M, Giordano V, Oikonomou M (2020). A Housing Design Audit for England. Place Alliance / UCL Bartlett School of Planning / CPRE. January 2020. Available at: placealliance.org.uk/research/national-housing-audit/

² Carmona M, Giordano V (2022). Appealing Design: Design-related planning appeals since revision of the National Planning Policy Framework. Place Alliance / UCL Bartlett School of Planning. Available at: placealliance.org.uk/research/appealing-design/

³ Carmona M, Giordano V (2021). The Design Deficit: Design skills and design governance approaches in English planning authorities. Place Alliance / UCL Bartlett School of Planning / Urban Design Group. July 2021. Available at: placealliance.org.uk/research/design-deficit/

⁴ MHCLG / Verian (2023). Local Authority Planning Capacity and Capability Survey 2023 Findings. Published January 2025. Available at: gov.uk/government/publications/local-authority-planning-capacity-and-skills-survey-2023-findings

⁵ MHCLG (2025). Local Authority Planning Capacity and Capability Survey 2025. Available at: gov.uk/government/publications/local-authority-planning-capacity-and-capability-survey-2025

⁶ Oldham Metropolitan Borough Council (2026). Achieving High Quality Design: Design Topic Paper (Publication Plan). Supporting document to the Oldham Local Plan Regulation 19 consultation. Available via the Oldham Council Local Plan consultation pages.

⁷ MCK Associates Limited (2024). Design and Access Statement (Revision C) in support of FUL/350118/22: Residential development of 4 sites in Derker for 132 residential units. Approved by Oldham Metropolitan Borough Council Planning Committee, 17 April 2024.

⁸ Kellen Architects (February 2026). Planning application FUL/355603/26: Land South of Bullcote Lane, Royton, Oldham. Submitted to Oldham Metropolitan Borough Council, February 2026. Available via the Oldham planning portal.

⁹ AshtonHale / Vistry Group (2025). Planning application FUL/355201/25: Demolition of existing buildings and erection of 147 dwellings, Southlink, Oldham Way, Oldham. Submitted October 2025. Available via the Oldham planning portal. Third-party representation on revised submission cited in this document is the author's own work.

¹⁰ Carmona M (2019). Place value: place quality and its impact on health, social, economic and environmental outcomes. *Journal of Urban Design*, 24(1), 1–48. DOI: 10.1080/13574809.2018.1472523. Open access.

¹¹ Frumkin H (2002). Urban sprawl and public health. *Public Health Reports*, 117(3), 201–217. Available at: ncbi.nlm.nih.gov/pmc/articles/PMC1497432/

¹² Sarkar C, Webster C, Gallacher J (2017). Association between adiposity outcomes and residential density: a full-data, cross-sectional analysis of 419,562 UK Biobank adult participants. *Lancet Planetary Health*, 1(7), e277–e288. DOI: 10.1016/S2542-5196(17)30119-5. Open access.

¹³ Wigan Metropolitan Borough Council (2024). Planning application A/23/96226/MAJOR: Astley Business Park, Astley Park Way, Tyldesley. Approved 11 June 2024. Independent Audit of Decision Making commissioned by Wigan Council and completed by Planning Officers Society Enterprises, December 2025.

Oldham Local Plan

Regulation 19 Representation

MAXIMUM CAR PARKING STANDARDS

Submitted by:

Graeme Moore BA (Hons) PgDip MA

[REDACTED]

March 2026

Regulation 19 Publication — representation submitted in response to the consultation closing 27 March 2026

Contents

Basis of this Representation	3
Introduction	4
Existing approach in Oldham	4
National planning policy context and proposed approach in Oldham	5
Managing Oldham's local road network	6
Greater Manchester context	6
Congestion in Oldham	8
Optimising the density of development in Oldham	12
Climate emergency	14
Explanation for the proposed parking standards	15
Car ownership	15
North West Plan Partial Review Parking Standards	17
Application of the NWPPR standards in the OLP	18
Use-specific standards	19
Case studies: the cost of inaction	27
Broadbent Moss / Beal Valley (Bullcote Lane)	27
Failsworth and Hollinwood Metrolink corridor	30
Oldham Town Centre	31
Findel Complex, Land East of Greengate, Chadderton	32
Derker residential sites, Oldham (FUL/350118/22)	33
Modification sought	32
Annex: Proposed maximum car parking standards	35

Basis of this Representation

1. I am a qualified town planner and urban designer. I hold a BA (Hons) in Planning Studies and a Postgraduate Diploma in Town Planning, both from Sheffield Hallam University, and a MA in Urban Design from the University of Sheffield. I am submitting this representation in a personal capacity in response to the Regulation 19 publication of the Oldham Local Plan (OLP). The consultation period closes on 27 March 2026.

2. This representation concerns the absence from the draft OLP of a policy establishing maximum car parking standards for new development across the borough. I submit that this absence renders the plan unsound. Specifically, I submit that the plan fails to meet the following tests of soundness set out in paragraph 35 of the National Planning Policy Framework (NPPF):

- **Justified:** the plan is not the most appropriate strategy when considered against the reasonable alternatives, and is not based on proportionate evidence. I have produced a substantial evidence base, presented in full in this representation, which clearly and compellingly justifies the inclusion of maximum parking standards. The council has not produced equivalent evidence in support of the Publication Plan, and in the absence of such a policy the plan is not adequately justified.
- **Effective:** without maximum parking standards, the plan cannot deliver its own transport and sustainability objectives. Development at the most accessible and sustainable locations in the borough — including strategic housing allocations adjacent to new Metrolink stops — is proceeding without any policy constraint on parking provision, undermining the modal shift objectives of both the OLP and the Places for Everyone Joint DPD.
- **Consistent with national policy:** paragraph 115 of the NPPF states that maximum parking standards should be set where there is clear and compelling justification that they are necessary for managing the local road network or for optimising the density of development in locations well served by public transport. Both conditions are met in Oldham, as I demonstrate in this representation.

3. The evidence base set out in this representation is my own work. It incorporates the most recent Department for Transport congestion statistics (year ending December 2024) and 2021 Census car ownership data at borough and ward level.

4. The modification I seek is the insertion into the OLP of a policy establishing maximum car parking standards for new development, based on the variable two-tier (Area Type A / Area Type B) framework set out in this representation and the accompanying draft Annex of standards. The full text of the modification sought is set out at the end of this document.

Introduction

5. This representation provides the evidential justification for the inclusion of maximum car parking standards in the OLP and explains the reasoning behind the maximum car parking standards I consider should be adopted for various types of development in different parts of the borough. It is organised to address directly the two limbs of NPPF paragraph 115: managing the local road network, and optimising the density of development in locations well served by public transport. It concludes with five case studies — drawn from current live planning applications, allocations and recently approved schemes within the borough — which illustrate in concrete terms the consequences of the absence of such a policy.

Existing approach in Oldham

6. Oldham currently has no adopted maximum car parking standards. Both residential and non-residential parking provision are dealt with on a case-by-case basis, having regard to the type and accommodation of the properties, their location, the availability of and proximity to public transport, the availability of shared parking and the existing level of on-street parking. There are no saved policies and no supplementary guidance that set maximum standards for parking across the borough.

7. The OLP represented the first opportunity in the plan period to establish a comprehensive, up-to-date suite of maximum parking standards. The Draft Plan (December 2023) included Policy T3 — Car Parking Standards in Oldham, together with Appendix 12, which set out quantified maximum parking standards for a range of uses across two area types. The Draft Plan Topic Paper (section 7) set out the evidential basis for this approach. It explicitly stated, at paragraph 7.2, that 'in areas of high transport accessibility, in order to meet the higher densities proposed, it will be necessary to reduce the level of car parking permitted.' This was a direct and unambiguous statement of the functional link between parking restraint, density, and public transport accessibility — and it was the council's own evidence base. The Draft Plan's reasoned justification went further, stating that those areas within 800 metres of a Metrolink and/or Quality Bus Transit corridor 'will be required to provide a lower amount of car parking on site,' with GMAL used to define areas of high public transport accessibility and to support the higher densities envisaged in Policy H3.

8. At Publication stage, the council removed Appendix 12 in its entirety and replaced the quantified standards with a criteria-based policy, without publishing a replacement evidence base to justify that change. The Publication Plan's Topic Paper states that the council met with National Highways and TfGM on 9 July 2025 and that 'both parties were satisfied with the amendments on Policy T3.' I submit that this sign-off does not address the soundness of the Publication Plan under NPPF paragraph 115. National Highways and TfGM were consulted on the policy mechanics and highway safety criteria — matters properly within their remit. Neither body is the arbiter of whether the removal of quantified standards constitutes a failure of justification or effectiveness under the NPPF soundness tests. Their satisfaction with the amended policy wording does not constitute evidence that a criteria-based approach will produce equivalent outcomes in terms of managing parking demand at accessible locations, or that the council's own reasoning at paragraph 7.2 of the Draft Topic Paper no longer holds. It does.

National planning policy context and proposed approach in Oldham

9. Paragraph 114 of the National Planning Policy Framework (NPPF) (December 2023) explains that if setting local standards for residential and non-residential development, policies should take into account:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

10. Paragraph 115 states that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.

11. The OLP is the appropriate document in which to set Oldham's parking standards and associated policy. I propose that standards are included through a dedicated parking policy and accompanying Annex.

12. The draft policy in the OLP should seek to ensure that the level of parking provided as part of new development is sufficient to support its successful functioning whilst discouraging unnecessary private car journeys and the inefficient use of land. It forms part of the plan's wider strategy to encourage the use of sustainable transport modes and improve accessibility for everyone, contributing towards increasing inclusivity and creating a fairer Oldham. The policy explains that the amount of parking provided within developments shall:

- Ensure that the development is inclusive and accessible to all users;
- Support the efficient use of land;
- Reflect the type, mix and use of development;
- Have regard to the accessibility of the development by modes other than the private car;
- Not discourage the use of more sustainable modes of transport such as walking, cycling and public transport;
- Not lead to a level of off-site car parking that would have an unacceptable impact on: (a) the safe and efficient operation of the highway network; or (b) the environmental quality or residential amenity of the local area; and
- Not exceed the maximum car parking standards set out in the relevant Annex.

13. I propose an Annex containing maximum car parking standards for specific uses for two area types within Oldham:

- Area type A: Oldham Town Centre, Chadderton Town Centre, Failsworth Town Centre, Lees District Centre, Royton Town Centre, Shaw Town Centre and Uppermill Village Centre, and any other location identified as being within a Metrolink stop catchment area (800m walking distance) in the evidence base.
- Area type B: All other parts of the borough.

14. As explained in paragraph 115 of the NPPF, maximum car parking standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport. A discussion around these two issues is provided below.

Managing Oldham's local road network

Greater Manchester context

15. Greater Manchester is growing, and in the last decade alone the population has increased by more than 200,000 to 2.8 million people, with significant growth in the economy.¹ Road congestion in Greater Manchester is already among the most severe in the UK, and the ambitious vision for Greater Manchester to become a top global city comes with its challenges. Analysis undertaken by Transport for Greater Manchester (TfGM) estimates that Greater Manchester's growth could result in an extra 800,000 trips each day on the transport networks by 2040.²

16. A 'congestion conversation' was initiated in 2017 by Andy Burnham, the Mayor of Greater Manchester, to better understand the impacts of congestion and what the priorities for tackling it should be. Over 7,000 responses were received and key congestion hotspots identified across the conurbation, including a number within and adjacent to the borough of Oldham, particularly along the A62, A627(M) corridor and the M60 junction 22 area.³

17. A congestion deal was established in 2018, setting out a range of integrated measures based around three main themes: improving the management of the transport network, giving people more choice about how and when they travel, and increasing the capacity of the transport network where appropriate. The congestion deal identifies the 14 busiest routes within Greater Manchester for special focus. The A62 Oldham corridor and the A627(M) are of particular relevance to Oldham.

18. The overarching transport strategy for Greater Manchester is outlined in the Greater Manchester Transport Strategy 2040, which expresses a vision for Greater Manchester to have world class connections that support long-term economic growth and access to opportunity for all.⁴ Although currently around 61% of trips are made by car in Greater Manchester, by 2040 the ambition is that this decreases to 50%, thereby enabling Greater Manchester's growth to be delivered without an increase in total private road vehicle traffic.⁵ Achieving this modal shift will require a significant change in people's travel behaviour so that walking and cycling become the natural choice for short journeys and public transport for longer trips.

19. In June 2019, the Mayor of Greater Manchester launched 'Our Network', a ten-year plan to create an integrated, modern and accessible public transport system. The vision is underpinned by contactless connections between different modes of public transport, in a zonal system with bus, tram, train, tram-train, cycling and walking modes, all working together as one integrated network. For Oldham, this is of particular significance given its position on the Metrolink network, with the Oldham and Rochdale line providing direct tram services into Manchester city centre.

20. New development has an important role to play in responding to congestion and supporting wider ambitions to secure a modal shift in Greater Manchester, through being designed and located to promote sustainable travel choices. This is reflected in the Greater Manchester Spatial Framework (now the Places for Everyone Joint Development Plan

¹ Andy Burnham, Mayor of Greater Manchester, GMCA, TfGM (2018). A Greater Manchester Congestion Deal. Page 2.

² GMCA, LEP, TfGM (4 January 2019). Greater Manchester Transport Strategy 2040 Draft Delivery Plan 2020–25. Paragraph 99, page 20.

³ Andy Burnham, Mayor of Greater Manchester, GMCA, TfGM (2018). A Greater Manchester Congestion Deal. Page 5.

⁴ Transport for Greater Manchester (February 2017). Greater Manchester Transport Strategy 2040. Paragraph 31, page 3.

⁵ GMCA, LEP, TfGM (4 January 2019). Greater Manchester Transport Strategy 2040 Draft Delivery Plan 2020–25. Paragraph 61, page 20.

Document, or PfE), with one of its strategic objectives being to promote the sustainable movement of people, goods and information.⁶

21. The Places for Everyone Joint DPD explains that the vision to deliver an accessible Greater Manchester with world class connectivity will be supported through a range of measures, including locating and designing development to deliver a significant increase in the proportion of trips that are made by walking, cycling and public transport. It explains that Greater Manchester's authorities will require new development to be designed to encourage walking, cycling and public transport, to reduce the negative effects of traffic, and improve health by promoting alternatives to car ownership, such as the use of low emission car clubs rather than the provision of car parking, and complying with any car parking standards set out in local plans.⁷ The inclusion of maximum car parking standards within the OLP will support the wider modal shift objectives for Greater Manchester.

22. The research evidence base on the relationship between parking provision and car use is clear and consistent. All car journeys start and end with parking, and parking management is therefore one of the most direct and effective levers available to local authorities seeking to influence mode choice and reduce car dependency.⁸ A 2023 evidence review commissioned by the Scottish Government found that parking standards and low-car housing development are directly linked to positive impacts on car kilometres travelled, car ownership and modal split. Car-free developments have been found to have car use levels at less than half of city-wide averages, and parking located 50 metres or more from dwellings is associated with 25% fewer car trips.⁹ A review of international academic evidence on residential parking found that parking availability has a greater influence on car ownership than household income or demographic characteristics — meaning that planning decisions about parking provision shape travel behaviour more directly than socio-economic context alone.¹⁰

23. The evidence also confirms that maximum parking standards work in practice. When London switched from minimum to maximum residential parking standards in the early 2000s, a subsequent evaluation found a 49% reduction in new residential parking supply.¹¹ This is a directly comparable English precedent: the same policy mechanism, the same development context, with a measurable and significant outcome. The experience of London demonstrates both that maximum standards are deliverable and that they produce the modal shift outcomes that Greater Manchester's transport strategy requires.

Congestion in Oldham

24. Oldham has experienced significant population growth in recent years. Latest estimates suggest a resident population within the borough of approximately 237,600 and

⁶ Greater Manchester Combined Authority (2022). Places for Everyone. Strategic objective 6.

⁷ Greater Manchester Combined Authority (2022). Places for Everyone. Policy JP-P8: transport requirements of new developments.

⁸ Campbell M, Marsden G, Walker R, McCulloch S, Jenkinson K and Anable J (2020). Decarbonising Transport: Climate Smart Parking Policies. LGA / DecarboN8 / CREDS. Available at: local.gov.uk/decarbonising-transport.

⁹ Rye T, Burns J, Whitefield A, Oxley-Glenister K, Pinkard J (2023). Reducing car use through parking policies: an evidence review. ClimateXChange / Ansons Consulting. DOI: dx.doi.org/10.7488/era/3776.

¹⁰ Officer report (2022). Overview of research on parking availability and private car use. October 2022. Drawing on: Guo Z (2013) residential parking and car ownership, New York City; De Gruyter C, Truong L, Taylor E (2020) parking supply and car ownership, Melbourne; Tian G, Park K, Ewing R (2019) trip generation and parking demand.

¹¹ Local authority officer report (2022). Overview of research on the relationship between parking availability and private car use. October 2022. Summarising 18 academic sources including: Guo Z (2013a) 'Does residential parking supply affect household car ownership? The case of New York City'; De Gruyter C, Truong L, Taylor E (2020) 'How do built environment factors influence the relationship between parking supply and car ownership?'; and Tian G, Park K, Ewing R (2019) 'Trip generation, trip chaining and parking demand at mixed use developments'.

projections suggest that a further increase of around 8–10% could be experienced over the plan period to 2040.¹²

25. Oldham has also seen significant growth in the number of jobs provided within the borough, including through the ongoing regeneration of Oldham town centre and the growth of employment areas such as Chadderton and Stakehill Industrial Estate. These positive trends are expected to continue over the plan period, including through strategic employment allocations at key sites identified in the PfE.

26. It will be important to ensure that further increases in the borough's resident and working populations are not accompanied by similar levels of growth in the use of cars, leading to increased congestion, poor air quality and reduced quality of life.

27. The relationship between parking provision and car ownership in Oldham's accessible locations is directly relevant to this objective. Research on residential parking in the New York region found that parking availability had a greater influence on car ownership than household income or demographic characteristics — a finding with significant implications for planning policy. Separately, research in Melbourne found that within 800 metres of public transport, average car ownership of each household reduced as service frequency increased.¹³ These findings directly support the two-tier Area Type A / Area Type B framework proposed in this representation: restricting parking provision in locations well served by Metrolink is expected to reduce car ownership and use in those locations, while higher provision remains appropriate in less accessible parts of the borough.

28. The latest travel diary surveys undertaken by Transport for Greater Manchester indicate that approximately 59% of all trips and 58% of all commuting trips in Oldham are made by car.¹⁴ Whilst there has been some improvement against earlier figures, there remains a considerable gap to close in order to achieve Greater Manchester's mode share ambition.

29. Oldham's geography, including its position at the northern edge of the M60 ring motorway and its road network linking to the M62 and the wider motorway system, results in significant levels of congestion on the highway network, particularly at peak times. The A627(M), which provides the key link between Oldham town centre and the M60, experiences some of the highest levels of delay on the sub-regional road network. Highways England and National Highways are engaged in ongoing work to address capacity and reliability issues on the M60 northern arc, which directly affects traffic movements to and from Oldham.

30. Tables 1 and 2 provide an indication of the levels of delay and travel speeds on the national Strategic Road Network (SRN) in the Greater Manchester area, which includes the M60, M62 and A627(M) corridors directly serving Oldham. The Greater Manchester Combined Authority average is used as the most relevant comparator given that Oldham's SRN links form part of this wider network. The data, drawn from DfT table CGN0405c and CGN0404c, shows that by 2024 Greater Manchester's SRN is experiencing average delays of 16.0 seconds per vehicle per mile — 37% above the England average — and average speeds of 52.7 mph against a national average of 55.9 mph. Critically, GM's SRN delay has increased by 54% since 2021 alone, compared to an increase of just 11% nationally over the same period.

¹² Office for National Statistics (2023). 2021 Census population estimates.

¹³ Officer report (2022). Overview of research on the relationship between parking availability and private car use. October 2022. Drawing on: Guo Z (2013) residential parking and car ownership, New York City; De Gruyter C, Truong L, Taylor E (2020) parking supply and car ownership, Melbourne; Tian G, Park K, Ewing R (2019) trip generation and parking demand.

¹⁴ Transport for Greater Manchester (2022). TfGM Travel Diary Surveys (TRADS), combined years 2019–2021. Main mode commute trips.

Table 1: Average delay on the Strategic Road Network (DfT CGN0405c)

Area	Average delay (seconds per vehicle per mile, 2024)
Greater Manchester (Combined Authority)	16.0
England	11.7

Source: Department for Transport / National Highways (2024). Table CGN0405c — Average delay on the Strategic Road Network for Combined Authorities in England.

Table 2: Average speed on the Strategic Road Network (DfT CGN0404a/c)

Area	Average speed (miles per hour, 2024)
Greater Manchester (Combined Authority)	52.7
England	55.9

Source: Department for Transport (2024). Tables CGN0404a and CGN0404c — Average speed on the Strategic Road Network in England.

31. Oldham's A-roads incorporate a number of major routes including:

- The A62 (Oldham Way / Manchester Road), which provides the principal radial route into and out of Oldham town centre towards Manchester and is one of the most congested urban A-roads in the borough;
- The A627(M) spur motorway, linking Oldham town centre to the M60 at junction 22;
- The A669 (Lees Road / Ashton Road), a key route connecting Oldham to Ashton-under-Lyne and the eastern part of the borough;
- The A6104 / A6050 routes serving Royton, Shaw and Crompton, connecting the northern parts of the borough to the town centre and the motorway network; and
- The A671 / B6194 corridors serving Uppermill, Saddleworth and the eastern settlements.

32. Oldham's A-roads are experiencing rapid deterioration in performance. Table 3 presents the average delay and speed data for locally managed A-roads drawn from DfT tables CGN0504d and CGN0503d. The data reveals that Oldham's average A-road delay of 82.3 seconds per vehicle per mile (2024) is 70% above the England average and 53% above the North West average. Whilst Oldham's absolute speed of 16.0 mph is broadly comparable to the Greater Manchester average of 16.3 mph, two aspects of the data are particularly significant. First, the rate of deterioration in Oldham (-19.6% speed decline since 2020) is nearly three times the national rate (-6.9%), meaning the gap between Oldham and the national average is widening rapidly. Second, and most striking, average delay on Oldham's A-roads has increased by 48.8% since 2020 — more than double the national rate of increase of 19.9% over the same period. Without intervention to manage traffic demand, this trajectory points to significant further worsening over the plan period.

Table 3: Average delay on locally managed A-roads (DfT CGN0504d)

Area	Average delay (sec/vehicle/mile, 2024)	Change 2020–2024
Oldham	82.3	+48.8%
Greater Manchester	82.2	+48.9%
North West	53.8	+28.4%

Area	Average delay (sec/vehicle/mile, 2024)	Change 2020–2024
England	48.3	+19.9%

Source: Department for Transport (2024). Table CGN0504d — Average delay on local A-roads by local authority in England. Years 2020–2024.

Table 4: Average speed on locally managed A-roads (DfT CGN0503d)

Area	Average speed (mph, 2024)	Change 2020–2024
Oldham	16.0	-19.6%
Greater Manchester	16.3	-17.7%
North West	21.2	-10.2%
England	23.0	-6.9%

Source: Department for Transport (2024). Table CGN0503d — Average speed on local A-roads by local authority in England. Years 2020–2024.

33. The route-level data available from DfT tables CGN0503e and CGN0504e provides a further layer of granularity and identifies the specific routes experiencing the most severe congestion within the borough. Table 5 summarises the key routes. The A671, A669 and A6104 corridors all record average delays well in excess of 90 seconds per vehicle per mile, with average speeds below 14 mph. The A663, which forms the critical link between Oldham town centre and the M60 at junctions 21 and 22, is the most severely affected individual route in the borough: the southbound approach to the M60 junction records delays of over 211 seconds per vehicle per mile in 2023, with speeds falling below 12 mph on the worst-performing section. This represents one of the most congested urban road links in the North West. The A62 (Oldham Way and Manchester Road), the principal radial route into Manchester city centre, records delays of 81.1 seconds per mile and average speeds of 16.1 mph.

Table 5: Speed and delay on key Oldham A-road routes (DfT CGN0503e/CGN0504e, 2023)

Road	Key section	Speed (mph, 2023)	Delay (sec/mile, 2023)
A671	Oldham borough (all sections)	12.5	103.5
A669	Lees Road / Ashton Road corridor	14.6	91.6
A6104	Royton / Shaw corridor	13.8	90.1
A62	Oldham Way / Manchester Road	16.1	81.1
A663	Broadway / M60 approach (worst section)	11.9–17.2	up to 211.6
A627	Oldham to Rochdale corridor	18.4	67.0

34. Having regard to the above discussion, and the wider Greater Manchester context, it is critical that the OLP presents an effective policy framework that will assist in managing potential impacts on the local road network in support of Greater Manchester's mode share ambitions. As part of a wider package of measures to reduce the need to travel and enhance options to utilise more sustainable modes of transport, restrictions on the availability of parking opportunities through maximum parking standards can contribute positively to reductions in

the use of private cars. The rate of congestion deterioration evidenced above — particularly the near-trebling of the national rate of A-road speed decline — provides clear and compelling justification, as required by paragraph 115 of the NPPF, for the inclusion of maximum parking standards within the OLP.

Optimising the density of development in Oldham

35. NPPF paragraph 122 describes that planning policies and decisions should support development that makes efficient use of land, taking into account:

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- local market conditions and viability;
- the availability and capacity of infrastructure and services — both existing and proposed — as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- the importance of securing well-designed, attractive and healthy places.

36. Ensuring that land is used efficiently can help to minimise the potential need for the development of greenfield or other protected land. It can also be important in minimising the need to travel and maximising the number of journeys made by sustainable modes, by enabling more people to live in locations that are well served by public transport and have good access to facilities. Policy requirements with this objective can therefore assist in addressing congestion and related issues.

37. Making the most efficient use of land is a significant priority for Oldham and for Greater Manchester as a whole. Through the preparation of the Places for Everyone Joint DPD, one of the main concerns raised through consultation was that sufficient use should be made of brownfield and previously developed land before any release of Green Belt land is considered. The adopted PfE contains policies that seek to maximise the use of brownfield land and to build at higher densities in the most accessible locations, helping to reduce the total amount of land required for new development. Within the plan period, the vast majority of housing development is expected to be located within the urban area.¹⁵

38. Oldham town centre and the wider town centre network present significant opportunities for higher-density regeneration-led development, particularly given their accessibility by Metrolink, bus and active travel modes. The efficient use of land in these locations is essential to the plan's wider regeneration strategy, and maximum parking standards are a critical tool in ensuring that land is not inefficiently consumed by excessive surface car parking at the expense of higher-value uses and higher-density development.

39. The necessity of this linkage was acknowledged in the council's own evidence base at Draft Plan stage. The Draft Plan Topic Paper on Policy T3 stated explicitly, at paragraph 7.2, that the density standards in Policy JP-H4 of Places for Everyone (and the equivalent Policy H4 in the Draft Local Plan) require a reduction in parking provision at accessible locations: 'in areas of high transport accessibility, in order to meet the higher densities proposed, it will be necessary to reduce the level of car parking permitted.' This is a clear recognition by the council that higher density and parking restraint are functionally inseparable at accessible locations. The Publication Plan retains the higher density requirements but removes the

¹⁵ Greater Manchester Combined Authority (2022). Places for Everyone Joint Development Plan Document. Housing supply trajectory and spatial distribution policy.

parking restraint mechanism through which they are to be delivered. This internal incoherence goes to the heart of the plan's effectiveness and is itself sufficient to render it unsound.

40. This relationship between density and parking is supported by independent research. Analysis by CPRE, drawing on findings from the Sustainable Development Commission, found that the efficiency benefits of public transport begin to take effect at densities of around 50 to 62 dwellings per hectare — the range at which frequent bus and tram services become viable and the need for private car use reduces.¹⁶ Significantly, the average density assumption on brownfield register sites across England in 2018 was just 41 dwellings per hectare — the same level as PfE Policy JP-H4's minimum density requirement for locations outside the Metrolink catchment, and well below the threshold at which public transport viability is optimised. This confirms that the density and parking standards frameworks must work together: building at the minimum JP-H4 density without simultaneously managing parking provision does not in itself generate the reduction in car dependency that the accessibility of those locations would support.

41. Furthermore, research on the relationship between density and energy consumption demonstrates that a family living in an energy-efficient house at low density may, because of the car trips that low density requires, have higher overall energy consumption than a family living in an un-insulated inner city dwelling.¹⁷ This finding — that car dependency at low density can negate the benefits of building energy efficiency — has direct implications for Oldham's carbon neutrality target. Reducing parking provision in the most accessible locations is therefore not merely a transport measure: it is a component of the carbon reduction strategy, reinforcing the climate emergency policy objectives already contained within the OLP.

42. The efficient use of land is reflected in the strategic objectives and various policies of the OLP, including:

- Strategic objective supporting regeneration and the efficient use of land, with a key target of delivering at least 85% of new dwellings on previously-developed land.
- Policy on climate change directing development to support the achievement of a carbon neutral Oldham by 2030, including through delivering a density of development that makes the most of accessible sites.
- Policy on efficient use of land directing developments to use land efficiently, with the highest density of development prioritised in the most accessible locations.
- Policy on housing density including minimum density requirements for new residential development, varying in accordance with the relative accessibility of different parts of the borough.
- Policy supporting sustainable transport, explaining that development will help to reduce the need to travel through its location, density and mix of uses.
- Policy on town centre car parking seeking to ensure that land within the town centre is used as efficiently as practicable, and supporting a reduction in the amount of surface car parking within it.

Climate emergency

43. The declaration of a climate emergency in Oldham is an important consideration. Per capita carbon emissions in Oldham have reduced significantly over recent years, partly due to changes in energy generation and improved building energy efficiency. However, transport

¹⁶ CPRE London (2019). Double the Density, Halve the Land Needed. June 2019. Citing Sustainable Development Commission (2007): efficiency benefits of public transport begin at densities of 50–62 dwellings per hectare.

¹⁷ Towers G. The Implications of Housing Density. CIB. Citing Smith et al (1998): car dependency at low density can negate building energy efficiency gains.

remains one of the most significant sources of carbon emissions in the borough, with the contribution from road traffic on the A62, A627(M) and motorway network being particularly notable.

44. On 20 February 2019, Oldham Metropolitan Borough Council declared a climate emergency. The council committed to working towards becoming a carbon neutral borough by 2030. The 5-Year Environment Plan for Greater Manchester 2019-2024 also sets a target date of 2038 for carbon neutrality for the wider city-region¹⁸ and identifies a set of key indicators relevant to this discussion:

- Ratio of journeys made by car to those made by sustainable modes of travel; and
- Proportion of all journeys made by cycling and walking.

45. Minimising contributions to and risks from climate change is a cross-cutting theme of the OLP and the target of carbon neutrality by 2030 is contained within the plan's strategic objectives. This target will only be achieved if there is a major reduction in emissions from the transport sector, and carefully controlling levels of parking — particularly in the most accessible locations — is, in my view, be an important part of the package of measures designed to influence and encourage more sustainable travel behaviour.

46. There is also an equity dimension to parking provision that is particularly relevant in the Oldham context. Research cited in the Local Government Association's decarbonising transport briefing notes that requiring all homes to have parking is regressive: non-car-owning households pay for the land area required for parking spaces they do not use, through higher property costs and rents.¹⁹ As noted elsewhere in this representation, 27.6% of Oldham's households have no car — a figure that rises to 56.4% in the most accessible parts of Oldham Town Centre. Mandating parking provision at levels that exceed what these households need adds to the cost of housing and consumes land that could support additional homes, active frontages or green infrastructure. Maximum parking standards — which set a ceiling rather than a floor — are the instrument that prevents this regressive outcome, by ensuring that parking is provided where genuinely needed rather than as a default regardless of accessibility or household need.

Explanation for the parking standards I propose for the OLP

47. Parking provision as part of new developments can be important in terms of ensuring their successful functioning and in support of social inclusion objectives. Insufficient parking provision can result in on-street parking which itself can contribute to congestion and compromise road safety.

48. However, as set out further above, controls on parking provision are important as a complementary measure to support efforts to reduce the need to travel, encourage the use of more sustainable transport, and ensure the efficient use of land. Over-provision can also have a negative impact on the streetscape and itself encourage car use.

49. I note that community representations made to earlier versions of the Local Plan raised concerns regarding the impact of parking provision on residential amenity, road safety and the character of the local street scene. These concerns operate in both directions: some representations expressed concern about insufficient parking leading to overspill onto local streets, whilst others raised the importance of sustainable design and reduced car dependency in accessible locations. Both sets of concerns are addressed by a properly

¹⁸ Greater Manchester (2019). 5-Year Environment Plan for Greater Manchester: 2019–2024.

calibrated maximum parking standards framework, which sets an upper limit whilst permitting lower provision where justified by accessibility.

50. The setting of appropriate maximum parking standards requires a balance to be found within this context, having regard to the issues set out in paragraph 114 of the NPPF:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

51. Issues relevant to criteria (a) to (d) are discussed in the following sections of this report. Criterion (e) is addressed in a separate background report in relation to electric vehicle charging infrastructure.

Car ownership

52. As identified above, the NPPF directs local authorities to have regard to car ownership levels in setting local standards for development. The 2021 Census shows that 27.6% of Oldham's households have no car or van — higher than the England average of 24% and the North West average of 25%. Just over two-fifths of households (42.6%) have one car, closely mirroring the England figure (41%). Households with two cars account for 23.1% in Oldham, compared to 26% nationally. At the upper end, just 6.7% of Oldham households have three or more vehicles, against a national figure of 9% and 11.8% in the South East.²⁰

Table 5: Car ownership by area — 2021 Census (ONS TS045)

Area	No car (%)	One car (%)	Two cars (%)	Three or more (%)
Oldham	27.6	42.6	23.1	6.7
North West	25.0	—	—	7.6
England	24.0	41.0	26.0	9.0

Source: Office for National Statistics, Census 2021, Table TS045 — Car or van availability.

53. Within Greater Manchester, Oldham is the third most car-free borough, behind Manchester (39% of households with no car) and Salford. Trafford has the lowest car-free rate in the conurbation at 19.3%. The data indicates that car ownership in Oldham is above the national average in terms of the no-car proportion, and below the national average for multi-car households, suggesting that parking demand per dwelling is likely to be lower in Oldham than the England average.²¹

54. Of particular significance to the spatial differentiation between area types proposed in this document is the substantial variation in car ownership within the borough. The 2021 Census data at ward level reveals a near five-fold difference in car-free household rates between Oldham's town centre wards and its rural eastern settlements. Oldham Town North, at the heart of the town centre, has 56.4% of households with no car — a rate comparable to inner London boroughs and more than five times the rate in Middleton Junction (10.6%) and

²⁰ Office for National Statistics (2023). Census 2021, Table TS045 — Car or van availability.

²¹ Office for National Statistics (2023). Census 2021, Table TS045 — Car or van availability.

New Delph, Dobcross and Austerlands (10.9%). At the opposite end, Diggle, Delph and Denshaw records 13.9% of households with three or more cars, compared to just 2.1% in Oldham Town North.²²

Table 6: Intra-borough variation in car ownership — selected wards (2021 Census, ONS TS045)

Ward / area	No car (%)	Three or more cars (%)
Oldham Town North	56.4	2.1
Oldham Town South	38.9	—
Diggle, Delph & Denshaw	—	13.9
New Delph, Dobcross & Austerlands	10.9	—
Middleton Junction	10.6	—

Source: Office for National Statistics, Census 2021, Table TS045 — Car or van availability. Ward-level data via Fifield J, The Oldham Times (2023).

55. This intra-borough variation provides compelling evidence for the two-tier area type approach set out in this document. Applying a single, uniform parking standard across such a diverse borough would result in either excessive parking in the town centre and Metrolink-accessible locations — where demand is demonstrably low and land efficiency is paramount — or insufficient parking in the rural eastern settlements where car ownership is high and public transport alternatives are limited. The variable maximum standards proposed through area types A and B directly respond to this pattern of car ownership across the borough.

North West Plan Partial Review Parking Standards

56. North West Parking Standards were included within the North West of England Regional Spatial Strategy (the Regional Strategy). Two sets of standards were established: regional and urban, with the urban values generally being more restrictive than the regional ones. It was proposed that the Partial Review of the North West Plan would review these existing standards and provide a revised comprehensive set of car parking standards which local authorities would be required to adhere to. The result was a set of proposed variable maximum car parking standards for three different area types. The Examination in Public of the North West Plan Partial Review (NWPPR) took place in March 2010. Consultants Mouchel were commissioned by the North West Regional Assembly to review the existing parking standards and provide recommendations for revised standards. These were generally accepted by the Panel in their report, subject to minor amendments.

57. However, following this, the Government expressed its intention to revoke the existing Regional Strategies. The Partial Review was subsequently abandoned. The Report of the Panel for the Partial Review of the North West Plan was issued for information only shortly after the examination was completed.

58. The standards proposed through the NWPPR remain relevant and the most appropriate basis for standards to be adopted in the OLP. They have been tested at examination and the adoption of these standards in Oldham would enable the council to apply

²² Office for National Statistics (2023). Census 2021, Table TS045 — Car or van availability.

variable standards across the borough, recognising the diverse nature of Oldham and the higher levels of public transport accessibility in the town centre and other centres served by Metrolink compared to other parts of the borough. This approach is consistent with paragraph 114 of the NPPF, which directs local authorities to consider the accessibility of development and the availability of and opportunities for public transport when setting local parking standards.

Application of the North West Partial Review standards in the OLP

59. The North West Plan Partial Review proposed that different maximum car parking standards should be applied to the following three different area accessibility categories:

- Area accessibility category A: includes the main metropolitan city centres (e.g. Liverpool and Manchester), the town centres in the metropolitan areas (e.g. Bolton and Stockport) and the regional town and city centres (e.g. Crewe and Preston).
- Area accessibility category B: includes the town centres within non-metropolitan areas together with district or local centres in metropolitan areas — i.e. not the main town or city centres but those serving local areas and neighbourhoods.
- Area accessibility category C: includes all other development areas within the settlement hierarchy, ranging from the urban area and suburbs in metropolitan areas to villages and rural/remote areas.²³

60. As a metropolitan borough and taking into account the relative differences in public transport accessibility across Oldham, I consider that the borough is appropriately categorised under two of these area types for the purposes of applying the variable maximum car parking standards:

- Area type A: Oldham Town Centre, Chadderton Town Centre, Failsworth Town Centre, Lees District Centre, Royton Town Centre, Shaw Town Centre and Uppermill Village Centre, and locations within an 800m walking catchment of a Metrolink stop.
- Area type C (retitled Area type B): All other parts of the borough.

61. This categorisation is presented within the OLP with area type C retitled as area type B due to there being only two area categories within Oldham. The rationale for identifying Oldham town centre and the named centres under Area type A is that these locations benefit from access to the Metrolink network (via the Oldham and Rochdale line and the East Didsbury/Rochdale corridor), are served by high-frequency bus routes and are identified as priorities for regeneration and higher-density development in line with the plan's land use strategy.

62. The standards in the OLP would provide maximum standards for a much wider range of uses than previous saved policies did, ensuring full account can be taken of the type, mix and use of development as required by the NPPF.

63. Compared with standards previously applied in Oldham, the standards proposed in the modification I seek generally allow for similar or lower levels of car parking in town centres and Metrolink-accessible locations (area type A) and similar or slightly higher levels of parking in all other parts of the borough (area type B). The draft policy in the OLP should explain that where the proposed scale of parking complies with the maximum standards, a lower level of car parking may still be sought.

64. The OLP approach to parking standards for residential development would represent the most significant difference from previous standards. The variable maximum standards proposed would place greater restrictions on the amount of car parking that could be permitted

²³ 4NW (July 2009). Submitted Draft North West Partial Plan Review. Page 24, Appendix 1.

in accessible locations and would enable consideration to be given to the size of dwellings in determining an appropriate level of car parking.

Use-specific standards

A5 Hot food takeaways

65. No standards were included in the NWPPR for hot food takeaways. The Report of the Panel recommended that parking standards should be established for hot food takeaways, and suggested that the standards for A3 uses should be used as the starting point. The OLP proposes that the maximum car parking standards for A3 and A4 uses are also applied to A5 uses (i.e. 1 space per 8sqm of public floor area in area type A and 1 space per 5sqm of public floor area in area type B).

B8 Storage and distribution

66. The NWPPR proposed standards would allow for considerably less parking for B8 uses (1 space per 100sqm for all area types) than was typically permitted under previous standards. A review of the amount of car parking that has been permitted in recent B8 schemes within the borough has been undertaken as shown in Table 6. Three named Oldham examples are instructive. FUL/349545/22, a B2/B8 development of 1,275sqm, was approved with 81 spaces — a ratio of 1 space per 15.7sqm, against a proposed maximum of 1 space per 75sqm; the approved scheme exceeds the equivalent maximum of 17 spaces by 64 spaces (376%). Land West of Leonard Way, Royton (FUL/351141/23), comprising two B2/B8 units of 11,110sqm approved in December 2023, was permitted with 167 spaces — 1 space per 66.5sqm, exceeding the equivalent maximum of 111 spaces by 56 spaces (50%). The officer's report concluded only that 'the proposals provide for adequate space for parking,' with no standard cited. The Findel Complex, Chadderton (FUL/351962/23), approved in February 2024 with 26,439sqm of B2/B8/E(g)(iii) floorspace, was permitted with 372 spaces — 1 space per 71sqm, exceeding the equivalent maximum of 264 spaces by 108 spaces (41%). The officer's report in that case stated explicitly that 'the Council does not have specific parking standards' and that the provision 'would appear to be sufficient.' The language differs between the two reports — 'adequate' in one, 'sufficient' in the other — but the underlying problem is identical: without a quantified benchmark, adequacy and sufficiency are matters of subjective judgment with no policy basis on which to require less. The pattern across all three named schemes shows that, in the absence of a maximum standard, provision consistently and significantly exceeds what one would permit.

67. The operational and parking requirements of warehousing therefore appear to vary depending on its scale. A threshold of 10,000sqm has been selected, as I consider that this would appropriately distinguish large-scale logistics operations (which increasingly use mechanised processes and have lower per-unit parking requirements) from smaller industrial and warehouse units. The following standards I therefore propose in the OLP for B8 uses:

- B8 (less than 10,000sqm): 1 space per 75sqm
- B8 (10,000sqm and above): 1 space per 100sqm

Table 6: Car parking in recent B8 schemes in Oldham (illustrative examples)

Development details	Car parking spaces	Standard achieved
B8 warehouse, Chadderton. 3,200sqm (example illustrative)	68 (plus 4 disabled)	1 space per 47sqm
B8 warehouse, Chadderton. 1,950sqm (example illustrative)	27 (plus 3 disabled)	1 space per 72sqm

Development details	Car parking spaces	Standard achieved
B2/B8 development, Oldham. 1,275sqm (FUL/349545/22)	81 spaces	1 space per 15.7sqm. Proposed maximum for B8 under 10,000sqm: 1 space per 75sqm — equivalent maximum would be 17 spaces. Approved scheme exceeds proposed maximum by 64 spaces (376%).
Large B8 logistics unit, Heywood/Stakehill. 18,000sqm (example illustrative)	182 (plus 12 disabled)	1 space per 99sqm
Land West of Leonard Way, Royton. Two B2/B8 units with ancillary offices totalling 11,110sqm. Approved December 2023 (FUL/351141/23). Officer's report (para 11.4): 'the proposals provide for adequate space for parking.' No standard cited.	167 spaces	1 space per 66.5sqm. Proposed maximum for B8 10,000sqm+: 1 space per 100sqm — equivalent maximum would be 111 spaces. Approved scheme exceeds proposed maximum by 56 spaces (50%).
Findel Complex, Land East of Greengate, Chadderton (FUL/351962/23). Two B2/B8/E(g)(iii) units totalling 26,439sqm gross. Approved February 2024.	372 (including 67 EV-enabled)	1 space per 71sqm. Proposed maximum for B8 10,000sqm+: 1 space per 100sqm — equivalent maximum would be 264 spaces. Approved scheme exceeds proposed maximum by 108 spaces (41%).

C2 Care homes

68. I propose the same standards as the NWPPR, but applied to spaces per resident rather than spaces per bed. Referring to spaces per bed lacks clarity (i.e. does this refer to single beds, double beds etc.) and it is clearer to identify the requirements on a per-resident basis.

C3 Residential: OLP Area Type A

69. Within Oldham town centre and the town and district centres within area type A, the NWPPR standards would allow for less parking for 1-bedroom dwellings (1 space), the same amount for 2–3 bedroom dwellings (1.5 spaces), and more parking for 4-bedroom dwellings (maximum 2 spaces) compared to previous standards.

70. In practice, 4-bedroom dwellings are provided within the town centre and Metrolink-accessible locations only in rare circumstances, and would be likely to be in the form of HMOs or high-density townhouses. Recently permitted and proposed schemes in Oldham town centre demonstrate that, in accessible locations, the market is already delivering parking provision that is substantially below even the proposed Area Type A maximum of 0.5 spaces per dwelling, as illustrated in Table 8. The three examples shown range from 0.15 spaces per dwelling down to zero. This confirms that the proposed standard is not onerous — it would function as a ceiling to prevent outliers rather than as a constraint on the typical scheme.

Table 8: Parking in recently permitted residential developments in Oldham Town Centre

Development details	Car parking spaces
Town centre apartment scheme, adjacent to King Street Metrolink stop, Oldham Town Centre. 120 apartments (75 x 1 bed, 43 x 2 bed, 2 x 3 bed) (FUL/353585/24)	18 spaces (0.15 spaces per dwelling)
Town centre apartment scheme, adjacent to Oldham Mumps Metrolink stop, Oldham Town Centre. 331 apartments (159 x 1 bed, 141 x 2 bed, 31 x 3 bed) (FUL/354326/25)	18 spaces — disabled only (0.05 spaces per dwelling)
Town centre apartment scheme, Oldham Town Centre. 93 apartments (35 x 1 bed, 52 x 2 bed, 6 x 3 bed) (OUT/354338/25)	0 spaces (0 spaces per dwelling)

71. The data in Table 8 is striking. The scheme at King Street (FUL/353585/24), adjacent to the King Street Metrolink stop, provides just 18 spaces for 120 apartments — 0.15 spaces per dwelling. The scheme at Oldham Mumps (FUL/354326/25), adjacent to the Oldham Mumps Metrolink stop and one of the largest residential proposals in the town centre with 331 apartments, provides 18 disabled spaces only — 0.05 spaces per dwelling. The outline application at OUT/354338/25 proposes zero car parking for 93 apartments. In each case the development is adjacent to Metrolink. In each case the market has concluded that minimal or no car parking is appropriate. The proposed maximum standard of 0.5 spaces per dwelling for Area Type A would be above all three of these schemes — it is not a constraint on good practice, it is protection against the scheme that bucks the trend and proposes significantly more.

C3 Residential: OLP Area Type B

72. Elsewhere in the borough (area type B), the standards proposed in the NWPPR would allow for less parking for 1-bedroom dwellings (1 space), and more parking for 2–3 bedroom dwellings (2 spaces) and 4-bedroom dwellings (3 spaces) compared to previous standards. Whilst I recognise that area type B varies considerably in terms of its relative levels of accessibility and private car use, a relaxation of current standards for C3 uses such as that proposed within the NWPPR could result in more car parking being provided within residential developments.

73. To inform the standards proposed, the representations made to the council by development management officers indicate that objections are often raised by local residents regarding insufficient parking provision in developments containing larger dwellings, with concerns about multiple vehicle ownership resulting in overspill parking to surrounding streets and associated road safety issues.

74. Having regard to these issues, and considering the need to balance the plan's wider sustainability objectives with residential amenity and the environmental quality of the borough, I propose for the OLP the following maximum standards for area type B:

- 1 bedroom dwellings: 1 space
- 2–3 bedroom dwellings: 1.5 spaces
- 4 bedroom dwellings: 2 spaces

C3 Sheltered accommodation

75. I propose the same standards as the NWPPR but referring to spaces per bedroom rather than spaces per bed. Referring to spaces per bed lacks clarity and it is clearer to identify the requirements on a per-bedroom basis.

C4 Houses in multiple occupation

76. Houses in multiple occupation (HMOs) are categorised under two different use classes: small HMOs (between 3 and 6 unrelated occupants) (C4) and large HMOs (more than 6 people) (sui generis). Parking provision within recently permitted HMOs in Oldham has generally been limited, with HMOs often situated in accessible locations such that little or no parking has been considered acceptable.

77. The following maximum car parking standards I propose for HMOs in the OLP:

- Within area type A (town centre and Metrolink-accessible locations): 1 space per 3 bedrooms.
- Within area type B: 1 space per 2 bedrooms.

78. In practice a lower level of parking is likely to be provided in many cases, where sites are located within or close to existing centres or close to high-frequency public transport routes. The higher maximum standard in area type B allows for some flexibility for proposals in less accessible locations, where concerns about increased on-street parking may otherwise arise.

Stadia and large sports venues

79. The NWPPR did not propose standards for stadia, considering that such developments are relatively rare and that parking needs could be considered on a case-by-case basis. Given that no current national maximum standard exists, I consider it useful to include a standard for stadia in the OLP. The standard proposed reflects established practice in the region (1 space per 18 spectators in area type A) and allows for slightly more car parking in area type B (1 space per 15 spectators), reflecting the relative accessibility of locations outside the town centres and Metrolink network. Standards refer to per spectator rather than per seat, as stadia and sports venues can include standing space.

Petrol filling stations

80. The NWPPR proposed that for petrol filling stations a maximum of 1 car parking space per pump should be provided. I consider that this standard is unclear, and it is uncertain whether this refers to the space adjacent to the pump where a car would park to refuel, or whether these car parking spaces should be provided separately. The OLP therefore proposes a more general requirement that provision is made to enable the safe operation of petrol pumps, car washing, air pumps, water taps etc. Car parking provision to serve ancillary retail units should be assessed separately.

Mixed use developments

81. This representation proposes guidance in relation to parking provision for mixed use developments. Where the various uses would operate at the same time, levels for all uses should be aggregated. Where the uses proposed would be likely to generate different parking demands at different times of the day, shared parking provision should be provided as far as is practicable. This is of particular importance in Oldham town centre, where the council receives a significant number of applications for mixed-use residential and commercial development. This guidance will help to ensure that an appropriate level of car parking is provided within such developments without encouraging inefficient over-provision.

Case studies: the cost of inaction

82. The sections above set out the evidential justification for maximum car parking standards in the OLP. In this section I illustrate, through five live examples drawn from current planning applications, strategic allocations and recently approved schemes within the borough, the concrete consequences of the absence of such a policy. These are not hypothetical scenarios: development is proceeding now, within the plan period, at precisely the locations where parking restraint is most needed. Each example demonstrates that the policy gap is not a theoretical risk but an active harm occurring on the ground.

Broadbent Moss / Beal Valley (Bullcote Lane)

83. The most significant illustration of the policy gap is also the most timely. The Broadbent Moss and Beal Valley strategic allocations (Places for Everyone sites JPA10 and JPA12) are identified in the PfE Joint DPD for residential-led mixed-use development capable of accommodating up to 1,700 new homes over the plan period. The fundamental planning justification for removing this land from the Greater Manchester Green Belt rests on a single infrastructure commitment: a new Metrolink stop at Cop Road, which will connect the site directly to the Oldham–Rochdale and East Didsbury–Rochdale lines and from there to Manchester city centre.

84. The Cop Road Metrolink stop places the entirety of the Broadbent Moss / Beal Valley allocation within an 800-metre walking catchment — the threshold I propose for Area Type A in the modified OLP. An 800-metre walking distance, equating to approximately a 10-minute walk, is consistent with the greater walk-time tolerance associated with high-frequency Metrolink services compared to conventional bus, and is consistent with the accessibility framework used in the council's own Draft Plan. This is not a marginal or borderline case: the new Metrolink stop is the *raison d'être* of the allocation. The case for maximum parking restraint at this site is therefore as strong as it is possible to be. A site that exists in the plan precisely because of its Metrolink accessibility should, above all others, be designed to generate the minimum necessary car dependency.

85. The SPD, as currently drafted, makes provision for up to 2 car parking spaces per dwelling across the site. This standard is applied uniformly, without differentiation by dwelling size, tenure or proximity to the Metrolink stop. The first planning application to come forward under the emerging masterplan framework — reference FUL/355603/26, submitted by Kellen Homes for 248 dwellings at Land South of Bullcote Lane — proposes one or two driveway parking spaces per dwelling. The application drawings reproduced below were submitted in February 2026 and show the scale and character of the development proposed.²⁴

²⁴ Kellen Architects (February 2026). Planning application FUL/355603/26: Land South of Bullcote Lane, Royton, Oldham. Drawing nos. A-100, A-101, A-007. Available via the Oldham planning portal.

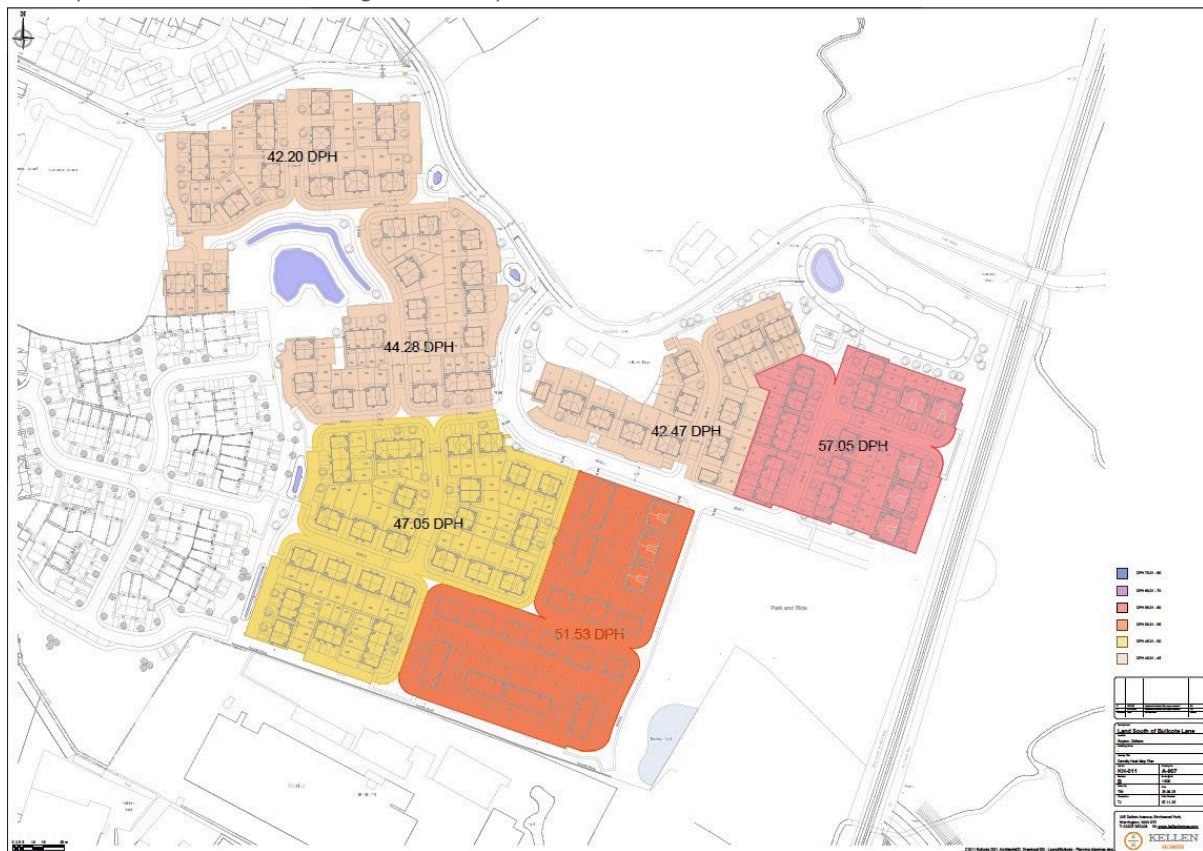
Figure 1: Site layout — Land South of Bullcote Lane (FUL/355603/26, drawing no. A-101)



Figure 2: Full site layout with schedule of areas — Land South of Bullcote Lane (FUL/355603/26, drawing no. A-100)



Figure 3: Density plan showing development parcels, none of which comply with PfE Policy JP-H4 which requires densities of 70dph on sites within 400m of a Metrolink stop (as is proposed here) a major contributing factor being the 2 spaces per dwelling being provided — Land South of Bullcote Lane (FUL/355603/26, drawing no. A-007)



86. The density plan (Figure 3) shows development parcels ranging from 42.20 DPH to 57.05 DPH. At the proposed standard of 2 spaces per dwelling, even the lowest-density parcels would generate over 84 parking spaces per hectare, rising to approximately 114 spaces per hectare in the highest-density zone. For context, a conventional suburban estate at 30 DPH with 2 spaces per dwelling generates 60 spaces per hectare. The density of parking being proposed at this Metrolink-adjacent location exceeds typical suburban provision by a factor of 1.4 to 1.9 — the inverse of what proximity to Metrolink should produce. The land efficiency consequences of this are directly quantifiable. The application proposes a maximum of 496 parking spaces across the 248 dwellings. The Area Type A maximum standard proposed in this representation — 0.5 spaces per dwelling — would generate a maximum of 124 spaces, a reduction of 372. Each parking space, including its proportionate share of access, requires approximately 26 square metres of land. The 372 spaces in excess of the proposed maximum therefore consume approximately 9,670 square metres — just under one hectare — of developable land. PfE Policy JP-H4 sets minimum density requirements of 70 dwellings per hectare for land within 400 metres of a Metrolink stop and 50 dwellings per hectare for land within 400 to 800 metres. The Cop Road stop sits within 400 metres of the northern parcels of the site and within 800 metres of the southern parcels. Applying those JP-H4 density requirements to the land consumed by excess parking, the proposed maximum standard would free up sufficient land for between approximately 50 and 68 additional dwellings on this phase alone — at precisely the densities that JP-H4 requires for this location but that the current parking assumptions make impossible to deliver. This is the first phase of an allocation of up to 1,700 homes. If equivalent parking assumptions are applied across the full allocation, the cumulative land consumed by parking in excess of the proposed maximum standard would be sufficient to accommodate several hundred additional homes at JP-H4-compliant densities — homes the plan's own density policy says should be built here.

87. The masterplan drawings also show a Park and Ride facility to the south of the site, in close proximity to the proposed Cop Road Metrolink stop (visible as the yellow-shaded area in Figure 2). I note that the provision of a Park and Ride facility is an acknowledgement, embedded in the masterplan itself, that car-based access to Metrolink is anticipated. Providing 2 spaces per dwelling across the residential development on top of this is double-counting car access. The Park and Ride serves those coming from elsewhere; the residential parking provision serves the residents themselves. A resident with 2 car parking spaces at their home has no structural incentive to use Metrolink for any trip that the car can serve.

88. The implications for the strategic road network are direct. The Broadbent Moss / Beal Valley site discharges traffic onto Bullcote Lane and then onto the A627 corridor, which the DfT data presented earlier in this representation shows to be experiencing significant and worsening delay. A development of 1,700 homes generating 2 car trips per dwelling per peak hour would add approximately 3,400 car movements to this corridor in each peak period. The absence of parking restraint is, on this site, a congestion policy as much as a transport policy.

89. Without maximum parking standards in the OLP, the council has no policy basis on which to require a lower level of parking at Broadbent Moss / Beal Valley. The Masterplan SPD cannot fill this gap: an SPD cannot impose a more restrictive standard than the development management policy framework permits, and in the absence of any policy framework on parking, the SPD provision of 2 spaces per dwelling becomes, in effect, a floor rather than a ceiling. I submit that this outcome is plainly contrary to the intent of NPPF paragraphs 114 and 115.

Failsworth and Hollinwood Metrolink corridor

90. The Northern Gateway strategic allocation at Foxdenton, straddling the Oldham–Manchester boundary in the vicinity of South Chadderton and Hollinwood Metrolink stops, provides a second live illustration of the policy gap. Multiple residential phases have come forward at this location over the plan period to date. The Hollinwood Metrolink stop places much of the allocation within an 800-metre walking catchment — again, Area Type A under the approach I propose. Yet in the absence of maximum parking standards in the OLP, consents at this location have been granted at parking ratios that do not reflect the quality of the Metrolink connection available.

91. The pattern here is systemic rather than site-specific. Across the Failsworth and Hollinwood corridor, planning applications for residential development within Metrolink catchments are being determined without any policy framework requiring the consideration of parking restraint. Each individual consent may be defensible in isolation — officers and applicants can point to local residential amenity concerns, highway objections from residents, and the absence of a policy basis for requiring fewer spaces — but the cumulative effect is a corridor of Metrolink-adjacent development generating car-dominated environments that undermine the very transport investment that the area has received.

92. I would invite the Inspector, in reaching conclusions on this representation, to request from the council a schedule of residential consents granted within 800 metres of each Metrolink stop in the borough since 2019, together with the parking ratio approved in each case. I am confident that schedule would confirm the picture I describe.

Oldham Town Centre

93. Within Oldham Town Centre itself — unambiguously Area Type A under any reasonable framework, and a location at the heart of the borough's regeneration strategy — the absence of maximum parking standards creates a different but equally significant problem. The town centre is the focus of significant residential development ambitions in the OLP, including proposals for higher-density living that can only be delivered if land is used efficiently. A residential scheme in the town centre that provides more parking than is necessary not only

generates unnecessary car trips but also consumes land that could otherwise deliver additional homes, active frontages or public realm.

94. The three recently permitted and proposed schemes set out in Table 8 of this representation illustrate that, in accessible town centre locations adjacent to Metrolink, the market is already delivering parking provision that is a fraction of the proposed Area Type A maximum. Ratios of 0.15, 0.05, and zero spaces per dwelling have been approved or proposed at King Street, Oldham Mumps and in a further town centre scheme respectively. This is not a problem of over-provision at these particular schemes — it is a demonstration of best practice. The problem is structural: without a maximum standard, there is no policy basis on which to refuse, or negotiate downwards, a scheme that proposes significantly more. The three schemes in Table 8 illustrate what good looks like in this location; the policy gap means there is nothing to stop a future applicant proposing something very different.

95. A specific concern in the town centre context is the interaction between parking provision and design quality. The NPPF is clear that planning decisions should give substantial weight to the value of using suitable brownfield land. In a constrained town centre context, every parking space at surface level or on a dedicated deck represents a design compromise. Maximum parking standards are the mechanism by which planning policy expresses the hierarchy of priorities: Metrolink, bus and active travel first; car parking where genuinely necessary; but never more than is necessary at the expense of place quality and land efficiency.

Findel Complex, Land East of Greengate, Chadderton (FUL/351962/23)

96. The fourth case study concerns not residential development but employment — and it demonstrates that the policy gap affects every use class, not just housing. In February 2024, the council approved the redevelopment of the former Findel Complex at Land East of Greengate, Chadderton, for two large commercial units in B2/B8/E(g)(iii) use, with a combined gross floorspace of 26,439sqm. The application was accompanied by a Transport Assessment and was assessed by the council's Highways Officer, TfGM and National Highways, none of whom raised objections.

97. The approved scheme provides 372 car parking spaces, including 67 EV-enabled bays — a ratio of 1 space per 71sqm of gross floorspace. Under the proposed maximum standard for large-format B8 development (1 space per 100sqm, applicable to schemes of 10,000sqm and above), the equivalent maximum provision would be 264 spaces. The approved scheme therefore exceeds the proposed maximum by 108 spaces — 41% above what the proposed framework would permit.

98. The officer's report is candid about the reason this level of parking was accepted without challenge. Paragraph 11.6 of the committee report states: 'The Council does not have specific parking standards. However, in this instance there would appear to be sufficient provision within the site layout.' This is a precise statement of the problem this representation seeks to address. Without a quantified benchmark, officers must make a qualitative judgment about what is 'sufficient' with no policy basis on which to require less. There is no mechanism to test the applicant's assumptions, no standard against which to measure the proposal, and no grounds on which to negotiate a reduction. The result is that 108 spaces more than the proposed maximum were approved at a site that is — it should be noted — located adjacent to the M60 motorway in Chadderton South, within reasonable reach of the South Chadderton Metrolink stop and with access to cross-boundary bus routes into Manchester.

99. The Findel Complex approval also exposes a secondary consequence of the policy gap that is less visible in residential contexts: the signal it sends to the logistics and employment development market. Large-format warehousing in particular is a sector where parking provision directly influences site layout and land coverage. A scheme that provides

41% more parking than necessary occupies significantly more land than would otherwise be required — land that could be used for additional floorspace, landscaping, active travel infrastructure or biodiversity net gain. The absence of maximum standards is not merely a transport policy failure; it is an inefficient use of employment land.

Derker residential sites, Oldham (FUL/350118/22)

100. The fifth case study is in some respects the most instructive of all, because it illustrates not a failure to resist an applicant's proposal but a failure embedded in the council's own approach to a regeneration site it was actively promoting. In April 2024, the council approved the residential development of four cleared sites in Derker — at Cromford Street, London Road, Evelyn Street and Abbotsford Road — for 132 dwellings by Hive Homes (FUL/350118/22). The application was approved unanimously at committee, 11 votes to nil.²⁵

101. The significance of the location cannot be overstated. The Derker Metrolink stop, on the East Didsbury–Rochdale line with services running every 12 minutes, is immediately adjacent to the Cromford Street site and within 400–600 metres of the other three parcels. Every part of the development falls within Area Type A under the framework I propose. This is not a fringe Metrolink-accessible location — it is one of the most directly Metrolink-accessible development sites in the borough.

102. The council's own Strategic Housing Land Availability Assessment (SHLAA, 2020) had identified a combined capacity for the three site clusters of 200 dwellings, at densities of between 55 and 71 dwellings per hectare. PfE Policy JP-H4 requires higher density residential development in locations of high public transport accessibility — precisely the policy imperative the council's Draft Plan Topic Paper acknowledged when it stated that 'in areas of high transport accessibility, in order to meet the higher densities proposed, it will be necessary to reduce the level of car parking permitted.' The application delivered 132 dwellings — 68 fewer than the SHLAA capacity, at densities well below those the SHLAA itself projected and well below what PfE JP-H4 requires at a location of this accessibility.

103. The Design and Access Statement for the application is illuminating on the reason for this outcome. The council's own pre-application development brief, referenced and reproduced in the D&A, sets out as design principle 3 that density should be 'suitable for the location taking into account market considerations' — a formulation that explicitly allows commercial judgment to override the accessibility-led density requirements of PfE. The D&A goes on to confirm that parking spaces are provided within private curtilage for each household, and that the council's strong preference, expressed in pre-application discussions, was for off-street car parking. The scheme delivers a layout of predominantly 2 and 3-bedroom semi-detached and mews houses, each with its own private driveway, on a site directly adjacent to a Metrolink stop and Park and Ride facility.

²⁵ MCK Associates Limited (2024). Design and Access Statement (Revision C) in support of FUL/350118/22: 132 residential units, Derker. Approved Oldham Metropolitan Borough Council Planning Committee, 17 April 2024.

Figure 4: Detailed site layout, the existing Metrolink station is located on the eastern edge of the sites, with a Park & Ride facility across the road from one of the Derker development parcels — Derker Residential Sites (FUL/350118/22)



104. This case study illustrates the precise mechanism the council's own Draft Topic Paper identified: without maximum parking standards, there is no policy tool to require the reduction in per-dwelling parking that higher density demands. The design brief's insistence on off-street provision for every household physically determined the layout, the plot sizes and therefore the density. Higher density — and the additional 68 homes the SHLAA said the sites could accommodate — was sacrificed to the provision of private driveways at a location where Metrolink is on the doorstep. This is not a failure attributable to the applicant: it reflects the council's own expressed preference in the absence of any policy framework requiring a different outcome. Maximum parking standards are the instrument that would have changed the conversation at pre-application stage and produced a design that realised the site's full potential.

Modification sought

105. For the reasons set out in this representation, I submit that the draft OLP is unsound in the absence of a policy establishing maximum car parking standards for new development. I invite the Inspector to recommend the following main modification:

106. The insertion into the OLP of a development management policy in the following terms, together with an Annex of use-specific maximum standards. The full proposed standards are set out in the Annex to this representation, which reproduces the standards contained in Appendix 12 of the Draft Plan:

POLICY [X]: MAXIMUM CAR PARKING STANDARDS The amount of car parking provided within new development shall not exceed the maximum standards set out in Annex [X] of this plan, having regard to:

- a) the accessibility of the development, including its proximity to the strategic public transport network;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure adequate provision for ultra-low emission vehicle charging.

Where a development site falls within Area Type A (as defined in Annex [X]), the lower maximum standards for that area type shall apply. Area Type A comprises Oldham Town Centre, Chadderton Town Centre, Failsworth Town Centre, Lees District Centre, Royton Town Centre, Shaw Town Centre, Uppermill Village Centre, and all locations falling within an 800 metre walking distance of a Metrolink stop as identified in the evidence base.

The 800-metre threshold (equating to a 10-minute walk) reflects the walk-time tolerance associated with high-frequency Metrolink services and is consistent with Greater Manchester Accessibility Level (GMAL) 6. A lower level of parking than the maximum may be sought where this would be consistent with the development's accessible location and the plan's wider sustainable transport objectives.

Why the Proposed Modification Would Make the Plan Sound

107. The Main Modification set out above would address the identified soundness issues and ensure that the Plan is justified, effective and consistent with national policy, as required by paragraph 35 of the National Planning Policy Framework.

(a) Justified

108. The proposed modification is supported by a substantial and proportionate evidence base. NPPF paragraph 115 establishes that maximum parking standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in locations well served by public transport. Both conditions are met in Oldham, as the evidence base presented in this representation demonstrates.

109. On managing the local road network: Department for Transport data (tables CGN0503e and CGN0504e, year ending December 2024) shows that average delay on Oldham's A-roads has increased by 48.8% between 2020 and 2024 — more than double the national rate of increase of 19.9%. Delay now stands at 82.3 seconds per vehicle per mile, 70% above the England average of 48.3 seconds. The A663 corridor records delays exceeding 211 seconds per vehicle per mile on its worst-performing section, making it one of

the most congested urban road links in the North West. Research evidence presented in this representation confirms that parking availability has a greater influence on car ownership than household income or demographic characteristics, and that car-free developments have car use at less than half city-wide averages. Restricting parking at accessible locations is therefore one of the most direct and evidence-based tools available for managing demand on Oldham's road network.

110. On optimising the density of development in locations well served by public transport: PfE Policy JP-H4 sets minimum density requirements of 70 dwellings per hectare within 400 metres of a Metrolink stop and 50 dwellings per hectare within 400 to 800 metres. The evidence base presented in this representation establishes that the density outcomes required by JP-H4 are only achievable if parking provision is constrained at those locations. The Bullcote Lane case study (FUL/355603/26) demonstrates in quantifiable terms that the 2 spaces per dwelling standard currently proposed for the first phase of the Broadbent Moss allocation consumes approximately 9,670 square metres of developable land - sufficient for between 50 and 68 additional dwellings at JP-H4-compliant densities. The absence of maximum parking standards is not a theoretical risk but an active and measurable impediment to delivery of the plan's own density objectives.

111. The two-tier Area Type A and Area Type B framework is individually justified. Area Type A reflects the 800-metre Metrolink threshold explicitly proposed in the Draft Plan's reasoned justification for Policy T3 and calibrated against GMAL Level 6. The use-specific standards in the Annex are drawn from and update the standards previously proposed in Draft Plan Appendix 12, which were derived from the North West Partial Plan Review — a document tested at examination and adopted as part of the regional spatial strategy. The council has not published any evidence at Publication stage to justify departing from those standards.

(b) Effective

112. The proposed modification would provide a clear, consistent and enforceable framework for parking provision in new development. Publication Plan Policy T3 establishes a criteria-based approach to parking without quantified maximum standards. Without a numerical benchmark, applicants design schemes based on their own assumptions, negotiations are conducted without a defined policy position, and appeal decisions become dependent on the subjective assessment of individual inspectors rather than adopted plan policy. The officer's report for the Findel Complex approval (FUL/351962/23) stated explicitly that "the Council does not have specific parking standards" and that the provision "would appear to be sufficient." The Derker approval illustrates the same problem: the council's own preference for off-street parking for every household physically determined the layout and therefore the density — 68 fewer homes than the SHLAA capacity, at a site directly adjacent to a Metrolink stop. These are not isolated examples; they are the systemic consequence of the absence of a quantified benchmark.

113. The policy is effective in its spatial framework. The distinction between Area Type A and Area Type B is based on an objectively defined and mappable criterion (proximity to a Metrolink stop measured in walking distance) that is unambiguous in its application and capable of being verified at any point in the development management process. The 800-metre catchment is consistent with GMAL Level 6, which the Publication Plan already references in Policy T3's reasoned justification at paragraph 17.26. Area Type A locations are therefore already identified in the plan's evidence base; the modification attaches the policy consequence that the Draft Plan intended.

114. The policy is effective in its standards framework. The use-specific maximum standards set out in the Annex provide a numerical benchmark against which any proposed level of parking provision can be objectively assessed. Where provision at or below the maximum is proposed, the policy provides the council with a clear basis for declining to require more. Where provision above the maximum is proposed, the policy provides an unambiguous

basis for refusal or negotiation. This dual clarity (a ceiling and a floor) is the defining characteristic of an effective parking standards policy and is precisely what the criteria-based approach in Publication Plan Policy T3 lacks.

115. The policy is effective in its relationship to density policy. By constraining parking at Area Type A locations, the modification directly supports the delivery of JP-H4 density requirements at those same locations. JP-H4 sets the density floor; Policy [X] sets the parking ceiling. Without the latter, the former cannot reliably be delivered. The Bullcote Lane and Derker case studies both demonstrate this relationship in concrete terms. The modification therefore strengthens the overall effectiveness of the plan as a strategy for sustainable development.

(c) Consistent with national policy

116. The proposed modification is directly required by, and consistent with, the specific terms of NPPF paragraph 115, which states that maximum parking standards for residential and non-residential development should be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in locations well served by public transport. Both conditions are met, as the evidence base demonstrates. The proposed modification is the direct policy expression of what NPPF paragraph 115 requires in those circumstances (the setting of maximum standards) and its absence from the Publication Plan is, on the evidence, a failure to comply with that specific requirement.

117. The proposed modification is also consistent with NPPF paragraph 114, which states that parking standards should take into account the accessibility of the development, the type, mix and use of development, the availability of and opportunities for public transport, local car ownership levels, and the need to ensure adequate provision for ultra-low emission vehicle charging. The two-tier Area Type framework directly reflects the accessibility criterion. The use-specific standards in the Annex directly reflect the type, mix and use criterion. The 2021 Census data on car ownership — 27.6% of Oldham households with no car, above both the North West and England averages, with ward-level variation from 56.4% car-free in Oldham Town North to 10.6% in Middleton Junction — directly addresses the car ownership criterion and supports the spatial differentiation between area types. The proposed modification therefore satisfies each of the specific factors that NPPF paragraph 114 identifies.

118. The proposed modification is consistent with NPPG on Transport, which confirms that maximum parking standards are an appropriate tool for managing travel demand and that local planning authorities should consider the role of parking in influencing travel behaviour when setting standards. It is consistent with Places for Everyone Policy JP-P8, which requires that new development in Greater Manchester complies with any car parking standards set out in local plans — standards that JP-P8 presupposes will exist, and whose absence the Publication Plan creates. It is consistent with the Greater Manchester Transport Strategy 2040 modal shift objectives, including the ambition to reduce the proportion of trips made by car from 61% to 50% by 2040, an ambition that is directly undermined by the absence of any policy constraint on parking provision at the most accessible locations in the borough.

Summary

120. The proposed modification (Policy [X]: Maximum Car Parking Standards, together with the accompanying Annex of use-specific maximum standards) would address both identified soundness failures in the Publication Plan. It would provide the justified, evidence-based policy that the Publication Plan currently lacks; it would make the plan effective by providing a clear numerical benchmark capable of consistent and enforceable application; and it would bring the plan into compliance with the specific requirements of NPPF paragraph 115, which directly requires the setting of maximum parking standards where the conditions present in Oldham are met. It is the most appropriate strategy when considered against the reasonable

alternatives, including the criteria-based approach currently in the Publication Plan, and it is supported by a proportionate and substantial evidence base that the council has not published equivalent material to contradict.

120. I would welcome the opportunity to engage with the Inspector and the council in the preparation of a statement of common ground on the parking standards matters raised in this representation.

Annex: Proposed maximum car parking standards

The table below sets out the proposed maximum car parking standards for use in conjunction with the modified Policy [X]. These standards are based on those contained in Appendix 12 of the Oldham Local Plan Draft Plan (December 2023), which I authored. The standards are set out for two area types:

- Area Type A: Oldham Town Centre, Chadderton Town Centre, Failsworth Town Centre, Lees District Centre, Royton Town Centre, Shaw Town Centre and Uppermill Village Centre, and all locations within 800 metres of a Metrolink stop or Quality Bus Transit (QBT) corridor (equivalent to GMAL Level 6).
- Area Type B: All other parts of Oldham.

Car parking provision that exceeds the standards set out below should only be permitted where it can be clearly demonstrated that there is no alternative practicable way of accommodating the travel demands likely to be generated by the development, and that all reasonable efforts are being made to minimise reliance on the private car. There are no minimum car parking standards for general users — only for disabled people, which are to be determined in accordance with the requirements of the Equality Act 2010 and BS 8300.

Type of development	Area Type A maximum	Area Type B maximum	Notes
Class E uses			
Class E — Food retail	1 space per 16sqm	1 space per 14sqm	Car parking within designated town and local centres should be available for the general public wherever possible.
Class E — Non-food retail and retail services	1 space per 22sqm	1 space per 20sqm	Car parking within designated town and local centres should be available for the general public wherever possible.
Class E — Retail warehouse (large stores specialising in household goods, DIY and other bulky goods)	1 space per 60sqm	1 space per 40sqm	Car parking within designated town and local centres should be available for the general public wherever possible.
Class E — Financial and professional services	1 space per 35sqm	1 space per 30sqm	Car parking within designated town and local centres should be available for the general public wherever possible.

Type of development	Area Type A maximum	Area Type B maximum	Notes
Class E — Restaurants and cafes	1 space per 8sqm public floor area	1 space per 5sqm public floor area	Car parking within designated town and local centres should be available for the general public wherever possible.
Class B uses			
Class B2 — General industry	1 space per 60sqm	1 space per 45sqm	
Class B8 — Storage and distribution (less than 10,000sqm)	1 space per 75sqm	1 space per 75sqm	
Class B8 — Storage and distribution (10,000sqm or more)	1 space per 100sqm	1 space per 100sqm	Reduced provision may be appropriate around highly automated distribution hubs.
Class C uses			
Class C1 — Hotels	1 space per bedroom	1 space per bedroom	These spaces should cater for staff as well as visitors. Parking provision for ancillary uses (e.g. conference centres) should be treated as additional, subject to assessment of potential efficiencies through shared use.
Class C2 — Care homes	1 space per 5 residents	1 space per 4 residents	
Class C2 — Hospitals	Case-by-case basis	Case-by-case basis	To be determined through a transport assessment covering staff, patients and visitors. Parking requirements must reflect the likely proportion of disabled visitors.
Class C3 — Dwelling houses	0.5 spaces per dwelling	1-bed: 1 space 2–3-bed: 1.5 spaces 4+	Garage provision does not count towards the maximum standard.

Type of development	Area Type A maximum	Area Type B maximum	Notes
		bed: 2 spaces. Visitor parking (to be integrated into the street): Minimum of 0.1 spaces per dwelling	Designated on-street visitor bays are required to prevent pavement parking and protect the safety and accessibility of footways for disabled people, people with pushchairs and others with mobility impairments, in accordance with the Equality Act 2010.
Class C3 — Sheltered accommodation	1 space per 3 bedrooms	1 space per 2 bedrooms	Standards should cater for all users and not just residents.
Class C4 and Sui Generis — Houses in multiple occupation	1 space per 3 bedrooms	1 space per 2 bedrooms	
Class F uses			
Class F1 — Clinics and health centres	1 space per 2 staff plus 1 per consulting room	1 space per 2 staff plus 4 per consulting room	
Class F1 — Creches, day nurseries and day centres	1 space per member of staff	1 space per member of staff	Need for attendee/drop-off spaces determined case-by-case through transport assessment.
Class F1 — Schools (primary and secondary)	1 space per classroom	2 spaces per classroom	Classrooms include all teaching spaces (gyms, science rooms etc.). Where schools have a sixth form, apply higher/further education standard.
Class F1 — Galleries, museums and libraries	1 space per 40sqm	1 space per 20sqm	
Class F1 — Places of worship	1 space per 10sqm	1 space per 5sqm	
Class F1 — Higher and further education	1 space per staff member	1 space per 2 staff plus 1 space per 10 students	Standards based on all staff including non-teaching staff, and total student

Type of development	Area Type A maximum	Area Type B maximum	Notes
			headcount including part-time students.
Class F1 — Cinemas, bingo halls, conference centres, casinos, music and concert halls	1 space per 10 seats	1 space per 5 seats	Where seating capacity is unknown at application stage, apply the Class F2 general leisure standard.
Class F2 — General leisure (dance halls, swimming baths, skating rinks, gymnasiums and other indoor recreation)	1 space per 25sqm	1 space per 22sqm	
Class F2 — Stadia	1 space per 18 spectators	1 space per 15 spectators	Standards relate to both seating and standing areas.
Sui Generis uses			
Sui Generis — Theatres	1 space per 10 seats	1 space per 5 seats	Where seating capacity is unknown at application stage, apply the Class F2 general leisure standard.
Sui Generis — Motorcar showrooms	1 space per 60sqm internal showroom	1 space per 50sqm internal showroom	
Sui Generis — Petrol filling stations	Provision required to enable safe operation of petrol pumps, car washing, air pumps, water taps etc.	Provision required to enable safe operation of petrol pumps, car washing, air pumps, water taps etc.	Car parking for ancillary retail units to be assessed separately.
Park and Ride, railway and bus stations and Metrolink stops	Case-by-case basis	Case-by-case basis	