

Oldham

Local Plan

**Oldham Local Plan: Publication Plan -
Regulation 19(1) Representations - Part 04 -
Ob to Od**

August 2026



Oldham
Council

Contents Page:

Respondent ID	Name	Individual or Organisation	Page Number
001	Bruce O'Brien	Emery Planning on behalf of Oakmere Homes Ltd	3
032	Cait O'Dowd	AshtonHale on behalf of Andy Hulme	24
036	Cait O'Dowd	AshtonHale on behalf of the Broadbent Moss and Beal Valley Consortium	60
030	Cait O'Dowd	AshtonHale on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell	100
028	Cait O'Dowd	AshtonHale on behalf of Grasscroft de Greenfield Ltd	139

From: Bruce O'Brien [REDACTED]
Sent: 09 March 2026 10:20
To: SPI Consultations
Cc: Gareth Salthouse
Subject: 24-250 - Land to the rear of 69 Broadway, Oldham, OL2 5DD
Attachments: REPS and appendices - Broadway.pdf

Dear SPI

Please find attached a representation for land to be considered for allocation within the Oldham Publication Plan.

Please confirm receipt by return.

Regards

Bruce O'Brien

SENIOR CONSULTANT

[Emery Planning 2026 Brochure](#)



The illustration depicts a vibrant neighborhood scene. On the left, a row of colorful houses (blue, yellow, and red) with green roofs is nestled under a large, leafy tree. A blue bird is perched on a branch. In the center, a small wooden birdhouse sits on a post, with a blue bird flying nearby. To the right, another row of colorful houses is shown, with a large pink cherry blossom tree in front of them. In the foreground, two dogs (one brown and one white) are playing with a green ball. A small pond with a duck and a turtle is also visible.

Direct Dial : [REDACTED]
Mobile : [REDACTED]
Email : [REDACTED]

1-4 South Park Court Hobson Street Macclesfield SK11 8BS	Regus House Herons Way Chester Business Park CH4 9QR
01625 433881	01244 732447

emeryplanning.com



Emery Planning Partnership Ltd trading as Emery Planning | Registered in England No. 4471702 | Registered Office: 2-4 South Park Court, Hobson Street, Macclesfield, SK11 8BS | The contents of this e-mail are confidential and intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed in this e-mail are those of the author and do not necessarily represent those of the company. If you are not the intended recipient (nor the person responsible for delivering to that recipient) be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify Emery Planning on info@emeryplanning.com

From: Gareth Salthouse [REDACTED]
Sent: 23 March 2026 10:13
To: SPI Consultations
Cc: Bruce O'Brien
Subject: FW: Oakmere Homes Ltd - Representations - Land to the rear of 69 Broadway, Oldham, OL2 5DD
Attachments: Completed Representations Form - Oakmere Homes Ltd.pdf; REPS and appendices - Broadway.pdf

Dear Sir/Madam

My colleague, Bruce O'Brien, submitted representations on behalf of Oakmere Homes Ltd via email on 9 March 2026. Please see below email. My understanding is that the representations form wasn't available at the time of submission but it is now. We've completed a copy attached to accompany the representations (the representations are unchanged – it is just the form that has now been completed and attached).

We would be grateful if you would confirm safe receipt.

Kind regards
Gareth

Gareth Salthouse BA (Hons), MPlan, MRTPI

DIRECTOR

[Emery Planning 2026 Brochure](#)



Direct Dial : [REDACTED]
Mobile : [REDACTED]
Email : [REDACTED]

emeryplanning.com

1-4 South Park Court Hobson Street Macclesfield SK11 8BS 01625 433881	Regus House Herons Way Chester Business Park CH4 9QR 01244 732447
--	--

From: Bruce O'Brien [REDACTED]
Sent: 09 March 2026 10:20
To: spi.consultations@oldham.gov.uk
Cc: Gareth Salthouse [REDACTED]
Subject: 24-250 - Land to the rear of 69 Broadway, Oldham, OL2 5DD

Dear SPI
Please find attached a representation for land to be considered for allocation within the Oldham Publication Plan.
Please confirm receipt by return.

Regards

Bruce O'Brien
SENIOR CONSULTANT

[Emery Planning 2026 Brochure](#)



Direct Dial : [REDACTED]
Mobile : [REDACTED]
Email : [REDACTED]

emeryplanning.com

1-4 South Park Court Hobson Street Macclesfield SK11 8BS 01625 433881	Regus House Herons Way Chester Business Park CH4 9QR 01244 732447
--	--





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	Mr
First Name	Mike	Bruce
Last Name	Gore	O'Brien
Job Title (where relevant)		Senior Planning Consultant
Organisation (where relevant)	Oakmere Homes Ltd	Emery Planning
Address Line 1		1-4 South Park Business Court
Line 2		Hobson Street
Line 3		Macclesfield
Line 4		
Post Code		SK11 8BS
Telephone Number		
E-mail Address (where relevant)		support@emeryplanning.com

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph		Policy	N1, CO1, H1	Policies Map	Allocations.
-----------	----------------------	--------	--	--------------	---

4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

Please see enclosed representations.

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

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

Please see enclosed representations. We have suggested that our site could be identified as a site allocation for residential development to provide certainty for the landowners and developer.

(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:

To orally participate given the complexity of the issues.

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.

Local Plan Representations

For Oakmere Homes Ltd | 24-250

Land to the rear of 69 Broadway, Oldham, OL2 5DD

Project: 24-250
Site Address: Land to the rear of 69 Broadway, Oldham, OL2 5DD
Client: Oakmere Homes Ltd
Date: 09 March 2026
Author: Bruce O'Brien
Approved by: Gareth Salthouse

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence. No part of this document may be reproduced without the prior written approval of Emery Planning. Emery Planning Partnership Limited trading as Emery Planning.

Contents

1.	Introduction	1
2.	Case for Allocation of the Site	2
3.	Conclusions	5

Appendices

- EP1.** Location Plan
- EP2.** Indicative Site Layout

1. Introduction

- 1.1 This representation is made on behalf of Oakmere Homes Limited in support of the allocation of a parcel of land in Royton, Oldham. The representation is in response to the issue of a draft Local Plan made available for consultation until 20th March 2026. This is the final consultation before the draft plan is submitted to the Planning Inspectorate for independent examination.
- 1.1 The land is the subject of a pending outline application LPA ref: OUT/355495/25 (*Residential development for up to 37 affordable dwellings with access considered (all other matters reserved)*).
- 1.2 The site comprises around 1.2 hectares of grassland and is an underused piece of open land in an urban area which is highly accessible to key services and amenities. It is being promoted for 37 affordable dwellings and given its sustainable location within the existing settlement boundary, we consider that it could be allocated for residential development in the Local Plan.
- 1.3 Our client supports the decision to remove the Green Corridor designation from our client's site.
- 1.4 This representation is made to demonstrate why we consider it to be a suitable, deliverable and developable area of land which could be considered for future growth to accommodate housing within Oldham.



Figure 1. Indicative Site Plan

2. Case for Allocation of the Site

Site Context

- 2.1 The site comprises an area of grassland approximately 1.2ha in size. There are no trees of significance on the site.
- 2.2 The land has historically been in private ownership and used for the grazing of horses; it continues to be used in this way. There is no authorised public access to the land.
- 2.3 The land is accessed via Broadway (A663) in-between existing residential properties.
- 2.4 The site is highly accessible within easy and convenient walking distance of a wide range of key services.

Site Suitability

- 2.5 The site was previously designated as a Green Corridor and Link in the adopted Local Plan (2011).

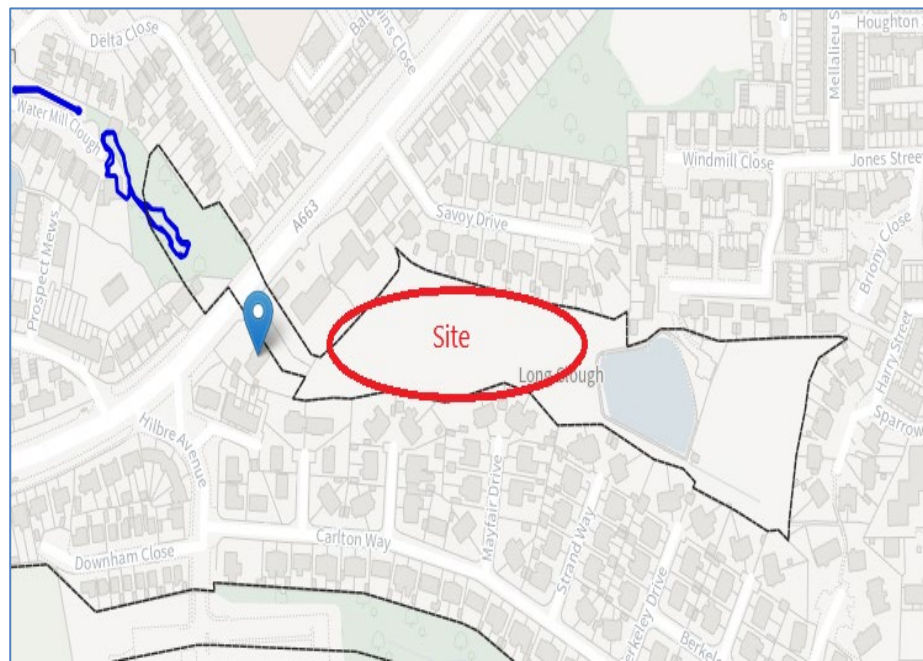


Figure 2. Black line- Green Corridor and Link as shown in adopted plan

- 2.6 The draft Local Plan has de-designated the site, and additional land to the east and west of the site, from its former status as a Green Corridor and Link.

- 2.7 Furthermore, the site is not designated as 'Open Space' in the draft plan.
- 2.8 Therefore, given the lack of Green Corridor and Open Space designations the parcel of land is 'white land' within the settlement boundary, a site that is free from such restrictions.

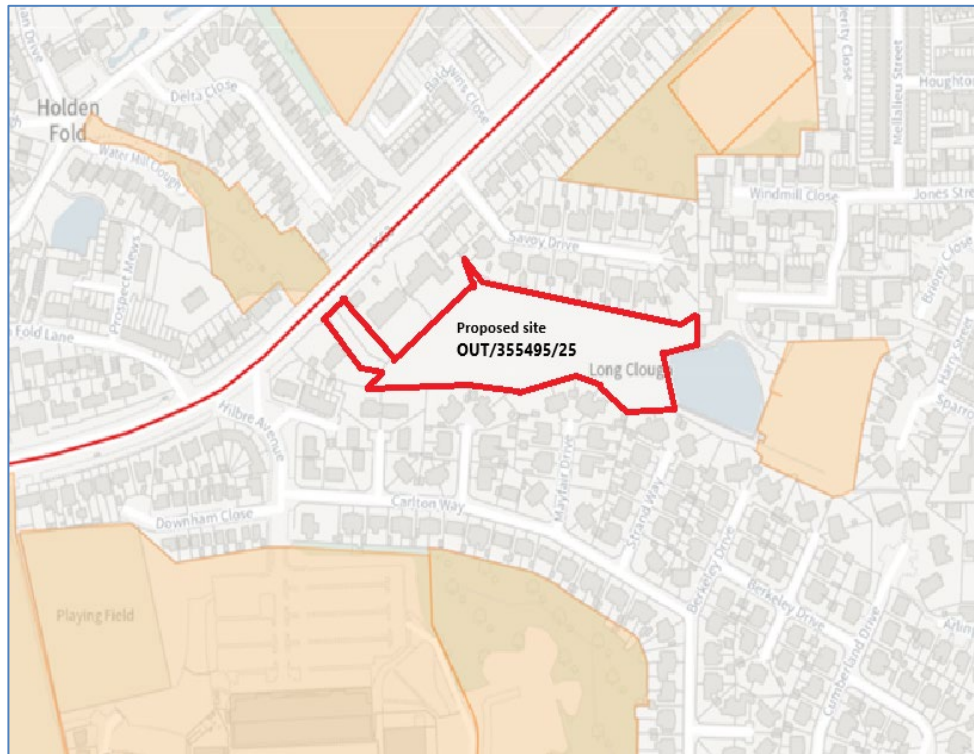


Figure 1. Site Area – Draft plan shows the site free of constraints. Orange= Open Space

- 2.9 Draft Policies N1 and CO1
- 2.10 We agree with the land being free of Green Corridor and Open Space designations and given the benefits of the supply of affordable housing on underused land within a settlement boundary.
- 2.11 Draft Policy H1
- 2.12 We consider that the site could be an allocated site within the Local Plan.
- 2.13 The following details emphasise the credentials for the land to be allocated and reflect the case put forward in the pending outline planning application.
- 2.14 The pending outline application aims to provide up to 37 affordable housing units. The Council under-delivered around 78% of its affordable housing need between 2011 and 2023, and there is an affordable housing need of 180 no. affordable units per annum in the northern area of the Borough alone. The

allocation of the site would help to ensure a significant contribution towards the future delivery of affordable housing where according to the latest available Local Authority Housing Statistics data, there are 6,943 households on the housing register for Oldham Borough (Oldham Local Housing Needs Assessment, 2024).

- 2.15 The site is an underused piece of open land in an urban area and is highly accessible to key services and amenities. The land is unremarkable in its visual qualities and condition, it is in private ownership, and it is not regarded highly enough to be designated as part of a Green Corridor and Link or Open Space.
- 2.16 A Flood Risk Assessment (FRA) has been submitted alongside the outline application which demonstrates that the underground culvert is not a watercourse, and the site is shown to be at low risk of fluvial flooding by. Notwithstanding this point, the scheme satisfies a Sequential Assessment in any event, and it is demonstrated that the scheme is safe over its lifetime for the purposes of the Exceptions Test. The FRA demonstrates that there is not a medium/high 'fluvial' flood risk on the site 'in the real world' and no increased risk as a result of the proposed scheme.
- 2.17 The current outline application has been assessed by the Highways Authority. The consultation response recommends that a granted planning permission should be subject to a condition requiring technical details and a financial contribution to cover the costs of a reduction in speed limit on Broadway.
- 2.18 Alongside the significant social benefits arising from the allocation of the site for affordable housing, the proposal would bring economic benefits arising from the scheme in terms of construction jobs and wider supply chain benefits during construction, and increased householder expenditure in the area once the properties are occupied.
- 2.19 The proposed development would result in a Biodiversity Net Gain of 10% which would be a tangible environmental benefit of allocating the site.

Deliverability

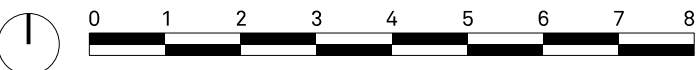
- 2.20 The site is owned by our client and is available for new development now. There has been firm interest from a number of Registered Providers to take this site forward. The commitment to development is also demonstrated by the proposal for 37 affordable dwellings being the subject of a current outline planning application.

3. Conclusions

- 3.1 The site is representative of an opportunity to provide a much-needed affordable housing development in a highly sustainable location, which could help meet Oldham's needs for housing growth and in particular affordable housing provision. Our client supports the removal of the Green Corridor designation from our client's site.
- 3.2 The site is a suitable site to be allocated for residential use, which is immediately deliverable.
- 3.3 We would respectfully request that the Council consider allocating the site as a new site for housing in the Local Plan.

EP1

Notes
This document is © Falconer Chester Hall Limited.
All drawing measurements shall not be obtained by scaling. Any discrepancies on this document to be immediately reported to the Architect. Verify all dimensions and levels prior to construction. This Document shall be read in conjunction with related documents, specifications and associated models.



KEY PLAN



P01	23.02.25	ST	MG	First Issue
Rev:	Date:	By:	Chk By:	Rev Note:

FALCONER
CHESTER
HALL

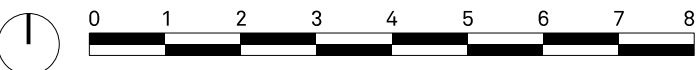
London | Liverpool | Manchester | www.fcharchitects.com | +44(0)151 243 5800

FCH

Project Title Broadway, Royton	Client XX	Drawing Title Existing Site Plan	Drawing No. P25008-FCH-XX-XX-DR-A-0200	Rev P01
Status S2	Issue suitable for: Feasibility	Date Feb 25	Scale 1:500 @ A1	Drawn By ST
Job No. P25-008	Drawing Stage Feasibility	Checked By MG		

EP2

Notes
This document is © Falconer Chester Hall Limited.
All drawing measurements shall not be obtained by scaling. Any discrepancies on this document to be immediately reported to the Architect. Verify all dimensions and levels prior to construction. This Document shall be read in conjunction with related documents, specifications and associated models.



KEY

- Site Boundary
- 3 bed /5 person
x 38no units



P01 23.02.25 ST MG First Issue
Rev: | Date: | By: | Chk By: | Rev Note:

**FALCONER
CHESTER
HALL**
London | Liverpool | Manchester | www.fcharchitects.com | +44(0)151 243 5800



Project Title
Broadway, Royton
Client
XX
Drawing Title
Proposed Site Plan
Drawing No.
P25008-FCH-XX-XX-DR-A-0201
Status
S2
Job No.
P25-008
Issue suitable for:
Feasibility
Drawing Stage
Feasibility
Date
Feb 25
Scale
1:500 @ A1
Rev
P01
Drawn By
ST
Checked By
MG

From: Cait O'Dowd - AshtonHale [REDACTED]
Sent: 27 March 2026 13:50
To: SPI Consultations
Cc: Louisa McCarthy - AshtonHale
Subject: Oldham Local Plan: Publication Plan- Representations on behalf of Andy Hulme
Attachments: Pre-App form.pdf; Representations to Oldham Council Reg19 Consultation Standedge Road 270326.pdf

Dear Sir/ Madam,

I am writing to formally submit representations on behalf of Andy Hulme in response to the Oldham Council Local Plan Regulation 19 Consultation.

Please find attached a letter which sets out comments relating to this consultation. We request that the contents of this letter be taken into account as part of the review process.

I would be grateful if you could confirm receipt of this submission, and request that we are kept updated with the future progress of the Local Plan.

Many thanks,

Cait

Cait O'Dowd

Planner
AshtonHale

[REDACTED]
A: ABC Buildings, 21-23 Quay Street, Manchester, M3 4AE
O: [Website](#) / [LinkedIn](#)



AshtonHale Ltd ("AshtonHale") is a Limited Company registered in England and Wales with registration number 14853239. Although AshtonHale has taken reasonable precautions to ensure no viruses are present in this email, AshtonHale cannot accept any responsibility for any loss or damage sustained as a result of computer viruses and the recipient must ensure that the email (and attachments) are virus free.

This message, including any document or file attached, is intended only for the addressee and may contain privileged and/or confidential information. Any other person is strictly prohibited from reading, using, disclosing or copying this message. If you have received this message in error, please notify the sender and delete the message.

Please also be aware that the presence of a signature or footer on this email does not constitute agreement or a signature of any contract for the purposes of sale, administration or transfer of land. Any such agreements must be made through appointed legal representatives. Thank you.



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		
First Name		Louisa
Last Name	Andy Hulme	McCarthy
Job Title (where relevant)		
Organisation (where relevant)		AshtonHale Ltd
Address Line 1		ABC Building
Line 2		Quay Street
Line 3		Spinningfields
Line 4		Manchester
Post Code		M3 4AE
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? Please refer to the enclosed Representations Document.

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

4. Do you consider the Local Plan is: Please refer to the enclosed Representations Document.

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

Please tick as appropriate

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

Please refer to the enclosed Representations Document.

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

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

Please refer to the enclosed Representations Document.

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

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

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

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

☐

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

☒

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

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:

Please refer to the enclosed Representations Document.

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

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

☒
☒
☒

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

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

The Adoption of the Oldham Local Plan.

Representations to Oldham Council's Local Plan Regulation 19 Consultation

Land at Standedge Road, Diggle

March 2026

Contents

1.	Executive Summary.....	2
2.	Introduction	3
3.	Background to Representations.....	4
4.	Planning for Growth.....	5
5.	Policy and Evidence Review.....	10
6.	Tests of Soundness	20
7.	Proposed Modifications	23
8.	Participation at Hearing Sessions	24
9.	Conclusion	25

Report title: Representations to Oldham Council's Local Plan Regulation 19 Consultation

Prepared by: COD/LM

Status: Final

For and on behalf of AshtonHale Limited

1. Executive Summary

- 1.1 These representations are submitted through the Regulation 19 Local Plan consultation on behalf of Andy Hulme, who holds interests in two sites across Oldham:
- Land east of Standedge Road, Diggle
 - Land west of Standedge Road, Diggle
- 1.2 The Plan relies on housing requirements derived from the Places for Everyone framework however, the updated December 2024 Framework introduces a revised standard method which is likely to increase housing need across Oldham. As such, the current strategy risks under delivering against future requirements.
- 1.3 Both sites identified above represent a sustainable and deliverable opportunity to contribute towards the borough's housing needs and should be considered for allocation. Both sites are available, suitable and achievable, and are located in sustainable locations with access to services, infrastructure and public transport.
- 1.4 The continued designation of these sites as Green Belt is not justified in all cases, particularly where sites may demonstrate characteristics of Grey Belt land, or make a limited contribution to Green Belt purposes.
- 1.5 The Local Plan, as currently drafted, fails to take a proactive approach to identifying deliverable housing sites. As a result, it is not sound. Modifications are therefore required to allocate, or otherwise support, the release of these sites for residential development.

2. Introduction

- 2.1 These representations have been prepared by AshtonHale Ltd on behalf of Andy Hulme (hereby referred to as “the landowner”) in response to the Oldham Council Local Plan Regulation 19 Consultation.
- 2.2 These representations are made in relation to the landowner’s interests at the below sites:
- Land east of Standedge Road, Diggle
 - Land west of Standedge Road, Diggle
- 2.3 Plans showing the site boundaries are attached at **Appendix I**.
- 2.4 These representations intend to cover the following:
- A background to the land interests;
 - The case for housing delivery at these sites in relation to the Policies within the Publication Plan;
 - Commentary on the soundness of Oldham Council’s Publication Plan;
 - Proposed modifications to the Publication Plan;
 - Proposed intentions for participating at future hearing sessions.

3. Background to Representations

3.1 The landowner seeks to promote two sites for development within the Regulation 19 consultation for residential use across Oldham, these sites are as follows:

- Land east of Standedge Road, Diggle
- Land west of Standedge Road, Diggle

3.2 Both sites are currently designated as Green Belt within the current Local Plan and the Publication Plan released for consultation. A summary of the context of these sites is set out below.

Land East and West of Standedge Road, Diggle

3.3 Both sites occupy sustainable locations along the A670, providing connections to Uppermill, Greenfield Railway Station and the A62. They are located close to existing residential areas and key services, including Saddleworth School, Diggle School and Saddleworth Medical Practice. Greenfield Station, approximately a 5-minute drive away, provides rail connections to Manchester Piccadilly, Leeds and York. Bus stops along the A670 provide regular services to Ashton-under-Lyne, Oldham and Brookbottom.

3.4 Land east of Standedge Road extends to approximately 0.3 acres and comprises primarily agricultural land located to the east of the A670. Residential development lies to the southeast.

3.5 Land west of Standedge Road extends to approximately 8 acres and comprises predominantly agricultural land. Residential development is located to the north.

4. Planning for Growth

- 4.1 The Oldham Local Plan has been aligned with the Places for Everyone (PfE) plan period, running to 2039, as it is intended to support delivery of the Joint Plan. The emerging Local Plan for Oldham focuses on non-strategic planning policies, primarily relating to development management. It will not identify new sites for future housing or employment development. Instead, the Plan provides a positive planning framework that underpins and facilitates the delivery of housing and employment land supply through its policies.
- 4.2 During preparation of the Plan, the National Planning Policy Framework ("NPPF") was updated in December 2024. The December 2024 NPPF introduced transitional arrangements allowing local planning authorities to rely on policies that deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020.
- 4.3 The Oldham Local Plan includes policies intended to deliver the housing requirement and development growth set out in the Places for Everyone joint development plan. As such, the Publication Plan has been prepared in accordance with the relevant previous version of the Framework, as set out in paragraph 235 of the NPPF. In this instance, this is the 2021 NPPF, under which PfE was examined.
- 4.4 The purpose of this Chapter is to highlight the requirements of the NPPF, as it was, on which the Publication Oldham Local Plan needs to be considered, as well as highlighting some of the relevant strategic policies with the Regulation 19 draft pertinent to the landowner's landholdings and representations. Commentary on whether the Publication Plan is sound in relation to these points is then contained in future Chapters.

National Planning Policy Framework

- 4.5 The NPPF (July 2021) states at Paragraph 15 that the planning system should be genuinely plan led, and that succinct and up to date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 4.6 NPPF Paragraph 16 states that plans should:
- a) be prepared with the objective of contributing to the achievement of sustainable development;

- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

4.7 Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

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

4.8 Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

Regulation 19 Oldham Local Plan- Key Strategic Policies

- 4.9 Vision for Building a Better Oldham: Our Local Plan Vision (page 23) states that “ Through delivering at least 11,560 new homes of different sizes and types, including affordable housing, Oldham will have quality homes for everyone that meet the needs of Oldham’s residents. New homes, delivered in sustainable and accessible locations, will contribute to inclusive and vibrant communities where everyone can live”.
- 4.10 Plan Objective 1 sets out the Council will build quality homes to meet local needs and diversify housing offer by:
- providing for, and supporting the delivery of, at least 11,560 new homes;
 - delivering a diverse housing offer to meet the needs of all residents including affordable housing and homes for families, older people and disabled people;
 - ensuring the delivery of high-quality, sustainable and well-designed new homes; and
 - ensuring appropriate densities and making the best and most effective use of brownfield land.
- 4.11 Policy H1 states that “ The Council will promote a diverse housing offer to meet the differing needs of all Oldham’s residents. Oldham's minimum local housing need (the number of new homes needed) is set out in Policy JP-H1 of PfE. PfE sets out that Oldham is required to deliver at least 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year” and 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, PfE and other Local Plan policies”.
- 4.12 Policy H2 notes that to achieve appropriate densities, new residential developments should achieve densities as set out in PfE Policy JP-H4.
- 4.13 Policy H3 details that “new residential developments should contribute to a diverse housing mix across the borough, ensuring that Oldham’s housing needs can be met. Oldham’s Local Housing Needs Assessment (LHNA) provides evidence in relation to housing mix, including tenure, bed size and house type” and that “ For some developments an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:
- i. It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;

- ii. It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;
- iii. The development is for specialist accommodation, such as for older and/ or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or
- iv. *There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.*

4.14 In terms of affordable housing, Policy H5 states that all developments providing 10 or more dwellings will be required to deliver an appropriate proportion of affordable housing in line with the value area in which the site is located. In line with the evidence set out in the Local Housing Needs Assessment, the tenure split for new affordable housing should be provided as follows:

- 25% affordable rented;
- 35% affordable home ownership; and
- 40% social rented.

4.15 Exemptions to this tenure mix apply where the proposed development:

- a) Provides solely for Build to Rent homes;
- b) Provides specialist housing to meet local housing needs;
- c) A specific tenure mix is required to meet funding requirements;
- d) Is exclusively for self-build or custom-build; or
- e) Is exclusively for affordable housing or is an exception site.

4.16 Policy H5 goes on to note that *"Whilst it is important to ensure the delivery of affordable housing to meet local needs, there may be some exceptions to providing the full amount of affordable housing required (either on or off-site). The following exceptions may be acceptable, at the Council's discretion on a case-by-case basis:*

1. *There is a high level of existing affordable housing and there is a need to diversify the housing offer in a particular location (to be agreed with the Council); and*
2. *Developments which involve the conversion or demolition of a vacant building, through the application of Vacant Building Credit (VBC), to support viability. In determining whether VBC applies, the Council will assess the evidence submitted by the applicant and its compliance with the criteria set out in PPG”.*

4.17 Policy IN2: Developer Contributions details that in some cases, a site specific viability assessment may be submitted where the need for such is evidenced by a change in circumstance which could not have been evident in the whole plan Viability Assessment, in line with NPPF and PPG. Where the site specific viability assessment provides evidence to demonstrate that it is not financially viable to provide the level of planning obligations proposed, reduced planning obligations will only be permitted where:

1. the value of the planning obligations has been maximised having regard to likely viability;
2. a clawback mechanism has been incorporated into the legal agreement where appropriate, to ensure that additional mitigation is provided if final development viability is better than anticipated in the initial viability assessment; and
3. the benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations.

5. Policy and Evidence Review

- 5.1 The following Chapter sets out the landowners key views and comments on the Publication Plan. Comments have not been made on every policy set out in the document, only those considered particularly relevant to their land interests. The absence of comment to any further policies should not be construed as the landowner agreeing with the approach taken.

Section 8: Homes

Housing Delivery

- 5.2 The Publication Plan sets out the requirement for the borough to deliver at least 11,560 new homes over the Plan period;

	Annual Average	2022- 2025	2025- 2030	2030- 2039	Total
Number of Homes Required	680	404	680	772	11,560

Table H1: Phasing of Housing Requirements

- 5.3 **Policy H1** of the Publication Plan sets out that “*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 policy and guidance, PfE and other Local Plan policies*”.
- 5.4 The Publication Plan sets out that housing development on previously developed land, within sustainable and accessible locations will be supported. All residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL) 4 or above.
- 5.5 As set out, the Publication Plan has been prepared in alignment with the 2021 publication of the NPPF. Oldham’s housing requirements are therefore stepped over three periods, and will increase significantly from 2026 onwards.
- 5.6 The emerging Local Plan has been prepared under transitional arrangements which allow it to rely on the previous version of the NPPF however, the updated version of the NPPF (December 2024) introduced a revised standard method for calculating local housing need. While the transitional arrangements allow plans that are sufficiently advanced to proceed

under the previous policy framework, the revised standard method represents the Government's most up to date assessment approach for determining housing need.

- 5.7 The figures detailed within Policy H1 are adapted from PfE Policy JP-H1 Table 7.2 and as such are dated and have been calculated using an out-of-date method.
- 5.8 Given this evolving policy context, it would be essential for the Council to commit to an early review of the Local Plan following adoption. Such a review would allow the Council to consider whether the housing requirement and spatial strategy remain consistent with national policy and with any updated assessment of housing need derived from the revised standard method. An early review of the Local Plan will be essential if Oldham's housing requirement falls short of the local housing need calculated by the updated standard method. Pursuant to Appendix I Paragraph 237 of the December 2024 NPPF, a deficiency necessitates a post-adoption review to address shortfall, align with current housing targets, and mitigate the risk of a mandatory 20% land supply buffer.
- 5.9 The supporting Housing Topic Paper highlights that housing completions in Oldham have historically been variable. Delivery increased from 2016/17, peaking in 2019/20 when several large sites were completed, before falling in 2020/21 and recovering gradually thereafter. Whilst completions have exceeded requirements in the early years of the plan period (approximately 115%), this must be considered in the context of a stepped housing requirement, with higher delivery rates required in later years.
- 5.10 The Council's December 2025 Strategic Housing Land Availability Assessment (SHLAA) identifies that housing supply in the early years of the plan period will largely come from sites under construction and those with extant permission, with a more limited contribution from strategic allocations. In the middle years of the plan period (2030-2035), supply is expected to be drawn from a broader mix of sources, including extant permissions, pending sites, PfE allocations and some previously stalled sites. By the later years of the plan period (2035-2039 and beyond), the SHLAA indicates that supply will rely increasingly on strategic allocations and other uncertain sources, including potential and stalled sites.
- 5.11 Sites such as those at Standedge Road represent a logical and sustainable opportunity for future housing delivery, particularly in the short to medium term, given the availability of existing infrastructure and services. This is especially relevant if the Plan is updated in line with the revised standard method. In light of the above, the Local Plan should recognise these sites as suitable and viable locations for residential development to help meet housing

needs. Accordingly, the sites should be viewed as key locations for development, despite their current Green Belt designations.

Land East of Standedge Road, Diggle

- 5.12 The development of land east of Standedge Road is justified by a combination of factors which, when taken together, amount to very special circumstances.
- 5.13 The site is small in scale and well contained by existing development and infrastructure. Its development would constitute a modest and logical extension to the existing settlement. The site is located in a sustainable location, with access to local services, schools, healthcare and public transport. It benefits from strong connectivity via the A670 and proximity to Greenfield railway station, making it an appropriate location for residential development.
- 5.14 The borough faces increasing pressure to meet housing needs, particularly under the revised standard method. The delivery of housing on small, sustainable sites such as this will be essential to maintaining supply and flexibility within the housing trajectory.

Land West of Standedge Road, Diggle

- 5.15 The site is partially constrained by natural features, including Diggle Brook, and is influenced by surrounding infrastructure such as the railway line and canal corridor. These features create a degree of physical containment and reduce the site's contribution to the openness and purposes of the Green Belt.
- 5.16 Parts of the site fall within Flood Zones 2 and 3, which will naturally limit the developable area and ensure that any development is appropriately located within less constrained areas. This further reduces the potential impact on openness.

Housing Densities

- 5.17 Publication **Policy H2** details the proposed minimum densities for residential developments within Oldham have been prepared in accordance with PfE Policy JP-H4. The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported.
- 5.18 The density assumptions applied through PfE formed part of the evidence base underpinning the strategic housing land supply across Greater Manchester and were tested through the examination process. Ensuring that development broadly aligns with those assumptions

therefore provides an appropriate starting point for development proposals within the borough.

- 5.19 Whilst the PfE density assumptions provide an important strategic benchmark, the Local Plan should retain sufficient flexibility to allow density to increase where appropriate. Increasing residential density in suitable locations can support the efficient use of land, enhance the viability of development and assist in delivering the borough's housing requirement. National planning policy also encourages the efficient use of land and supports development that makes optimal use of sites, particularly where this can be achieved without compromising design quality or the character of the surrounding area.
- 5.20 Accordingly, the Local Plan should ensure that density policies do not operate as a constraint where higher densities would be appropriate in design, transport or sustainability terms.

Housing Mix

- 5.21 Oldham's Publication Local Plan details within **Policy H3** that new residential development should contribute to a diverse housing mix across the borough, ensuring that Oldham's housing needs can be met. The overall recommended dwelling type/size and mix are set out within Table H3 of the Publication Plan and have been extracted below;

Dwelling type/size	Market	Affordable/ Social rented	Affordable home ownership	Total
Overall % split	80%	12%	8%	100%
Dwelling type				
House	70-75%	35-40%	65-70%	60-65%
Flat	2-5%	30-35%	15-20%	10-15%
Bungalow/level-access	25-30%	30-35%	15-20%	25-30%
Size (bedrooms)				
1 to 2	30-35%	70-75%	35-40%	40-45%
3	40-45%	20-25%	40-45%	35-40%
4+	25-30%	5-10%	20-25%	20-25%

- 5.22 The Policy continues to note that;

For some developments an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:

1. It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;
2. It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;
3. The development is for specialist accommodation, such as for older and/ or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or
4. There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.

5.23 The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains deliverable and that housing mix should not be restricted to the mix set out in Table H3.

5.24 It is important that the application of housing mix requirements does not adversely impact the viability and deliverability of development. Where it can be demonstrated through the planning application process that strict adherence to the housing mix set out in Policy H3 would adversely impact development viability, the policy should allow sufficient flexibility for an alternative mix to be delivered. This will ensure that housing delivery can proceed in a timely manner while still contributing to meeting identified housing needs across the borough.

Affordable Housing

5.25 Publication **Policy H5** states that the Local Plan will ensure that a diverse type and tenure of affordable housing will need to be delivered to accommodate all households in need. All developments that provide 10 or more net additional homes, will be required to deliver an appropriate portion of the total site capacity as affordable housing in line with the value area in which the site is located and the land type, as set out in Table H4;

Value Area	Brownfield Land	Greenfield Land
High Value	20% of site capacity	25% of site capacity
Medium and Low Value	10% of site capacity	10% of site capacity

- 5.26 In accordance with the Value Area's map found within the Publication Plan, both of the land interests are located within a 'Higher Value Zone' for affordable housing, meaning that 20% of site capacity upon brownfield land, and 25% of greenfield land capacity should be delivered as affordable housing.
- 5.27 The Publication Plan notes that developments should provide affordable housing onsite however, by exception, it may be more appropriate, in meeting local needs for the payment of a commuted sum/ developer contribution to off site provision, or a mixture of onsite/off site provision. Off site contributions should provide the number of units that would have been delivered on site.
- 5.28 The principle of delivering affordable housing through new residential development is supported. Ensuring that development contributes towards meeting the borough's affordable housing needs is an important component of delivering balanced and sustainable communities.
- 5.29 It is noted that the quantity of homes required to trigger affordable housing requirements at sites has decreased from 15 dwellings (Adopted Oldham Joint Core Strategy and Development Management Policies DPD Policy 10) to 10 dwellings. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites.
- 5.30 Sites such as the land off Standedge Road represent a logical location for the delivery of affordable housing, which the landowner is committed to providing within any future residential planning application at the site.

Section 14: Addressing the Biodiversity Emergency

Green Infrastructure Network

- 5.31 As set out in Publication **Policy OTC4**, the Council will support proposals which will create, protect and enhance multi-functional Green Infrastructure within and around Oldham Town Centre, including " *the incorporation of biodiversity enhancements such as green walls and*

roofs, trees, and landscaping - encouraging wildlife, and creating interest and shade". The aim of this is to create a link of green spaces that will create active travel routes, and strategic landscapes, reaching from the town centre and beyond.

- 5.32 **Policy N1** details that designated sites, such as Sites of Biological Importance, will be safeguarded and harm should be avoided.
- 5.33 Publication **Policy N3** further notes that new development is expected to make an appropriate contribution to addressing local needs and opportunities for Green Infrastructure provision by retaining, enhancing and creating green spaces and corridors. Development for 20+ homes or non-residential development of 1,000m²+ will be required, where appropriate to:
- i. Enhance the landscape setting of the site by improving the character, appearance and condition of access corridors into the site, gateways, settlement edges and landscape features, including historic environment assets;
 - ii. Enhance pedestrian and cycle connectivity between residential areas, town centres, schools and workplaces, outdoor sports, tourism and recreational facilities, public transport services and the countryside around the site; and
 - iii. Facilitate for the production of food (e.g. allotments and community gardens) within residential or mixed-use developments.
- 5.34 The landowner fully support the Council's proposals to increase green links and provide enhanced biodiversity provisions within new. As part of any future application for development, an ecological assessment will be undertaken to determine how the habitat sites will be protected and/or enhanced. In addition, across both of the sites, residential development proposals would seek to retain and enhance habitat and ecological areas.

Section 12: Addressing Climate Change

Flood Risk and Drainage

- 5.35 **Policies CC2** and **CC3** detail the Council's approach to development, and the associated impact to increased flood risk and associated drainage. The landowner recognises that these two issues are instrumental to bringing forward sustainable development and that they should be managed appropriately across development sites to reduce risk.
- 5.36 Where sites are affected by flood risk, proposals should be carefully designed to mitigate and reduce the potential for flooding, while where possible improving existing conditions, in accordance with national policy. Development should respond positively to such constraints,

ensuring that well designed schemes can both manage flood risk effectively and contribute towards meeting housing needs.

Section 13: Natural Environment and Open Land

Green Belt

- 5.37 Publication **Policy OL2** stresses the importance of preserving the openness and permanence of Oldham's Green Belt, in line with national policy. Within the Green Belt, national planning policy will be applied including the refusal against inappropriate development except in very special circumstances.
- 5.38 The landowner supports the overarching objectives of Policy OL2 and recognises the important role of the Green Belt in preventing urban sprawl, safeguarding the countryside from encroachment, and preserving the setting of settlements however, national policy is clear that Green Belt designation does not represent an absolute constraint to development. Where very special circumstances exist, planning permission should be granted. In determining whether very special circumstances apply, decision makers must undertake a planning balance. This involves assessing whether the harm to the Green Belt, by reason of inappropriateness and any other harm, is clearly outweighed by other considerations. This is a qualitative exercise, with no prescribed list of factors that may constitute very special circumstances. It is therefore necessary to consider both individual and cumulative benefits on a case-by-case basis.
- 5.39 Furthermore, recent national policy has introduced the concept of "Grey Belt" land, recognising that not all land within the Green Belt performs equally against its purposes. Previously Developed Land, contained sites, or areas with limited contribution to Green Belt purposes should be considered for release where this would support sustainable development objectives, particularly in meeting housing needs.
- 5.40 In accordance with the NPPF, to be considered deliverable, sites should:
- Be Available Now: A site is considered available where there is confidence that there are no legal or ownership problems;
 - Be Suitable: A site is considered suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and

- Be Achievable: A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site within five years. This is a judgement about the economic viability of a site and the capacity of the developer to compete and sell housing over a certain period considering market factors, cost factors and delivery factors.

- 5.41 Both sites at Standedge Road meet these criteria and represent a deliverable opportunity for residential development. The sites are available, located within sustainable areas with good access to services and infrastructure, and are capable of being brought forward in the short term.
- 5.42 In the context of the updated National Planning Policy Framework (December 2024), which introduces a revised standard method for calculating housing need, it is likely that Oldham's housing requirement will increase. The Council cannot rely solely on the housing figures established through Places for Everyone and must ensure that sufficient deliverable sites are available to meet future needs.
- 5.43 In this regard, sites such as those promoted in this document, particularly where they exhibit characteristics of Grey Belt land, represent logical and sustainable opportunities to contribute towards housing delivery. The release and development of such sites would assist the Council in meeting its housing requirements, maintaining a robust supply of deliverable sites, and reducing the risk of under delivery over the plan period.
- 5.44 In accordance with national policy, substantial weight is afforded to any harm to the Green Belt however, the assessment must consider whether that harm is clearly outweighed by other considerations. In this case, the combination of site-specific characteristics and the pressing need to deliver housing in sustainable locations amounts to very special circumstances.

Section 16: Achieving High Quality Design

Design

- 5.45 High quality design standards will be expected from all development in accordance with Publication **Policy D1**. The policy makes specific reference to the fact that development proposals, should through their design “*deliver buildings and spaces that are appropriate, in terms of their form, massing and height, for the site and surrounding context, and positively respond to local distinctiveness and character*”.

- 5.46 There is a clear opportunity to deliver a considered residential schemes that reflects the vernacular of the surrounding area, incorporating high quality materials, active frontages, and legible layouts at the site. Particular attention should be given to the interface with Green Belt land, ensuring that development enhances key views and contributes positively to the sense of place.
- 5.47 A comprehensive and design led approach, will ensure that development not only complies with Policy D1 but also delivers a scheme that enhances local character, responds sensitively to its context, and contributes to the long-term quality and sustainability of the area.

Section 20: Infrastructure and Delivery in Oldham

Planning Obligations

- 5.48 The requirement for planning obligations is set out within **Policy IN2** of the Plan. The policy confirms that where development would generate additional demand for infrastructure, services and facilities beyond existing capacity, appropriate provision and/or financial contributions will be required to mitigate those impacts. This may include the provision of infrastructure onsite or, where more appropriate, contributions towards new or enhanced provision off-site.
- 5.49 It is also important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability. Policy IN2 confirms that, where justified, a site-specific viability assessment may be submitted where there has been a material change in circumstances that was not evident at the time of the whole plan viability assessment, in accordance with national policy set out in the National Planning Policy Framework and Planning Practice Guidance.
- 5.50 Where such assessments demonstrate that it is not financially viable to deliver the full extent of planning obligations, the policy allows for reduced obligations to be considered, subject to appropriate safeguards. These include ensuring that the value of planning obligations has been maximised having regard to viability, the inclusion of clawback mechanisms where appropriate to capture any future uplift in viability, and the need to balance the benefits of development against any shortfall in mitigation.

6. Tests of Soundness

6.1 Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound.

6.2 The tests of soundness are set out in the NPPF, December 2021 (para 35), which states:

“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

6.3 The landowner has prepared the below comments regarding the soundness of the Publication Local Plan under the four headings used in the NPPF.

Positively Prepared

6.4 For a plan to be “positively prepared”, it must be based on a strategy which, as a minimum, seeks to meet objectively assessed development and infrastructure requirements, and is informed by agreements with other authorities.

6.5 The reliance on housing figures derived from Places for Everyone and the 2021 Framework does not reflect the revised standard method introduced in December 2024. This is likely to result in a higher housing requirement across the borough. The omission of sustainable, deliverable sites, such as those promoted in this document, limits the Council’s ability to

respond to this increased need. A positively prepared plan should identify a sufficient supply of deliverable and developable land, including appropriate Green Belt releases where necessary.

Justified

- 6.6 The NPPF states that for a plan to be “justified”, it must be an appropriate strategy when considered against the reasonable alternatives, and must be based on proportionate evidence.
- 6.7 The Plan is not justified because it has not been demonstrated that the strategy represents the most appropriate approach when considered against reasonable alternatives. The promoted sites are well related to existing settlements, located in sustainable locations and capable of being developed in a manner that would contribute positively to the borough’s housing supply.

Effective

- 6.8 The NPPF states that for a plan to be “effective”, it must be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 6.9 The Plan is not considered effective because there is insufficient certainty that housing delivery will be achieved over the plan period. Evidence within the Council’s own documentation suggests that delivery in later years of the Plan will increasingly rely on uncertain sources of supply, including strategic allocations and sites that have previously stalled

Consistent with National Policy

- 6.10 The NPPF states that for a plan to be consistent with National Policy, it must enable the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 6.11 The Plan is not fully consistent with national policy. The National Planning Policy Framework places significant emphasis on boosting the supply of housing, making effective use of land and ensuring that plans remain responsive to changing circumstances. National policy also recognises the need to review Green Belt boundaries where necessary and acknowledges the potential role of Grey Belt land in meeting development needs.

- 6.12 The continued exclusion of sustainable and deliverable sites that could contribute to housing supply conflicts with these objectives. In particular, where sites represent contained or previously developed land and make a limited contribution to the purposes of the Green Belt, their release should be properly considered as part of the plan making process.

7. Proposed Modifications

- 7.1 In order to ensure that the Publication Local Plan, this Chapter has been prepared to set out the proposed modifications put forward to address the Regulation 19 draft of Oldham's Local Plan.
- 7.2 Firstly, the Plan should be amended to allocate the sites promoted by the landowner for residential development. The allocation of these sites would provide additional flexibility within the housing land supply and would assist the Council in meeting housing needs over the plan period.
- 7.3 Proposed policy wording amendments have been detailed in ***bold italics*** in the text below.

Policy H1- Delivering a Diverse and Sustainable Housing Offer

- 7.4 The landowner supports the addition of the following text to Policy H1:

The Council will promote a diverse housing offer to meet the differing needs of all Oldham's residents. Oldham's minimum local housing need (the number of new homes needed) is set out in Policy JP-H1 of PfE. PfE sets out that Oldham is required to deliver at least 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year. The housing requirement is phased through a stepped housing requirement as set out in Table H1.

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, 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)²⁶ 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 Council will support the redevelopment of Green Belt land in sustainable and accessible locations for housing, particularly where such sites are no longer serve Green Belt purposes and a justified housing need can be presented.

8. Participation at Hearing Sessions

- 8.1 The landowner may wish to take part in any relevant Hearing Session(s) as part of the Local Plan Examination in Public.

9. Conclusion

- 9.1 The Plan's reliance on outdated housing figures undermines its ability to meet future housing requirements. This is particularly concerning in light of the revised standard method introduced through the December 2024 National Planning Policy Framework.
- 9.2 To address these issues, the Council must adopt a more flexible and responsive approach, including the allocation or release of suitable sites such as those promoted in this document. Both of the sites represents a sustainable, deliverable and logical opportunity to contribute towards meeting Oldham's housing needs, and the sites are available, suitable and achievable, and in some cases benefit from an established planning history for residential development.
- 9.3 Without these changes, the Plan will fail to deliver the homes required and will not meet the tests of soundness.

Appendix I

Site Location Plans: Land east of Standedge Road

AHRRB63 site plan



Site Location Plans: Land west of Standedge Road, Diggle

AHRRB71 site plan



Keyboard shortcuts Map data © 2026 Imagery © 2026 Airbus, Maxar Technologies Terms Report a map error

From: Cait O'Dowd - AshtonHale [REDACTED]
Sent: 27 March 2026 09:43
To: SPI Consultations
Cc: Richard Barton - AshtonHale
Subject: Oldham Local Plan: Publication Plan- Representations on behalf of the Broadbent Moss and Beal Valley Consortium
Attachments: FINAL Representations to Oldham Council Reg19 Consultation 270326.pdf;
Representation_Form_Amended_for_extended_consultation_period_FINAL RB.pdf

Dear Sir/ Madam,

I am writing to formally submit representations on behalf of Grasscroft Property, Barratt Homes Manchester, Kellen Homes, Wain Homes, and The Casey Group (referred to as “the Broadbent Moss and Beal Valley Consortium”), in response to the Oldham Council Local Plan Regulation 19 Consultation.

Please find attached a letter which sets out the Consortium's comments relating to this consultation. The Consortium request that the contents of this letter be taken into account as part of the review process.

I would be grateful if you could confirm receipt of this submission, and request that we are kept updated with the future progress of the Local Plan.

Many thanks,

Cait

Cait O'Dowd

Planner
AshtonHale



A: ABC Buildings, 21-23 Quay Street, Manchester, M3 4AE
O: [Website](#) / [LinkedIn](#)



AshtonHale Ltd ("AshtonHale") is a Limited Company registered in England and Wales with registration number 14853239. Although AshtonHale has taken reasonable precautions to ensure no viruses are present in this email, AshtonHale cannot accept any responsibility for any loss or damage sustained as a result of computer viruses and the recipient must ensure that the email (and attachments) are virus free.

This message, including any document or file attached, is intended only for the addressee and may contain privileged and/or confidential information. Any other person is strictly prohibited from reading, using, disclosing or copying this message. If you have received this message in error, please notify the sender and delete the message.

Please also be aware that the presence of a signature or footer on this email does not constitute agreement or a signature of any contract for the purposes of sale, administration or transfer of land. Any such agreements must be made through appointed legal representatives. Thank you.



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		
First Name	Grasscroft Property, Barratt Homes Manchester, Kellen	Richard
Last Name	Homes, Wain Homes, and The Casey Group (hereby referred to as "the Broadbent Moss and Beal Valley Consortium" or "the Consortium")	Barton
Job Title (where relevant)		
Organisation (where relevant)		AshtonHale Ltd
Address Line 1		ABC Building
Line 2		Quay Street
Line 3		Spinningfields
Line 4		Manchester
Post Code		M3 4AE
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? Please refer to the enclosed Representation document.

Paragraph Policy Policies Map

4. Do you consider the Local Plan is: Please refer to the enclosed Representation document.

1. Legally compliant Yes No

2. Sound Yes No

3. Complies with the Duty to Co-operate Yes No

Please tick as appropriate

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

Please refer to the enclosed Representation document.

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

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

Please refer to the enclosed Representation document.

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

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

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

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

☐

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

☒

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

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:

Please refer to the enclosed Representation document.

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

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

☒

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

☒

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

☒

The Adoption of the Oldham Local Plan.



AshtonHale

Representations to Oldham Council's Local Plan Regulation 19 Consultation on behalf of the Broadbent Moss and Beal Valley Consortium

Beal Valley and Broadbent Moss

March 2026

Contents

1.	Executive Summary	3
2.	Introduction	4
3.	Background to Representations.....	6
4.	Planning for Growth.....	9
5.	Policy and Evidence Review	14
6.	Tests of Soundness	29
7.	Participation at Hearing Sessions.....	32
8.	Conclusion	33

Report title: Representations to Oldham Council's Local Plan Regulation 19 Consultation

Prepared by: COD/RB

Status: Final

For and on behalf of AshtonHale Limited

1. Executive Summary

- 1.1 These representations are submitted on behalf of Grasscroft Property, Barratt Homes Manchester, Kellen Homes, Wain Homes, and The Casey Group (hereby referred to as “the Broadbent Moss and Beal Valley Consortium” or “the Consortium”) in respect of land interests at Oldham’s adopted strategic allocations of Beal Valley and Broadbent Moss, identified through the Places for Everyone plan.
- 1.2 The Consortium supports the spatial and strategic strategy outlined within Oldham’s Publication Local Plan. Beal Valley and Broadbent Moss will play an important role in delivering Oldham’s housing and employment land requirements between 2022-2039 by providing new homes alongside employment land, supporting infrastructure, green infrastructure and community facilities.
- 1.3 The Consortium therefore supports the Publication Plan’s objective of delivering sustainable growth and creating high quality new communities. It is considered that the Local Plan could provide clearer support for the delivery of strategic allocations identified through PfE, recognising their important role in meeting the borough’s housing and employment requirements.
- 1.4 The Local Plan should also benefit from recognising the role of the Draft Beal Valley and Broadbent Moss Masterplan and Spatial Design Code, which has been endorsed by the Council, in guiding the design and delivery of development across these strategic allocations.
- 1.5 Subject to the comments outlined within these representations, the Consortium considers that the Publication Local Plan can provide an effective framework for delivering sustainable growth in Oldham and supporting the delivery of the PfE strategic allocations.

2. Introduction

- 2.1 These representations have been prepared by AshtonHale Ltd on behalf of Grasscroft Property, Barratt Homes Manchester, Kellen Homes, Wain Homes, and The Casey Group (hereby referred to as “the Broadbent Moss and Beal Valley Consortium” or “the Consortium”) in response to the Oldham Council Local Plan Regulation 19 Consultation.
- 2.2 The Consortium, comprised of several developers and landowners, manages land across Beal Valley and Broadbent Moss. The Consortium is focused on bringing high quality sustainable housing and employment opportunities to Oldham, along with infrastructure, services and facilities to support the wider community:

Barratt Homes Manchester- has completed hundreds of new communities over the last 40 years. Barratt Redrow’s award-winning homes are much loved by customers and Barratt Redrow want to ensure that the places and communities they create are equally valued.

Kellen Homes- are a responsible and sustainable developer, with a passion for delivering on our promises. Kellen Homes create communities and neighbourhoods that people are proud to call home. The Kellen Homes team takes great pride in the design and workmanship of each new home they build. The team also holds vast experience in developing complex and brownfield sites, with site sizes ranging from 5 to 100+ acres.

Wain Homes- are passionate about what they do and how they do it. Wain Homes are constantly learning and evolving to ensure that they remain an excellent place maker, to create places that enrich both the environment, and the way people live and work.

The Casey Group- has been operating within the built environmental sectors for over 50 years and their award-winning activities span construction and development, civil engineering, public realm and environmental works, and plant hire.

Grasscroft Property- a local company which has been successfully delivering development across Oldham and the North West for a number of years.

- 2.3 These representations are made in relation to the Consortium’s interest at Beal Valley and Broadbent Moss, two sites which form part of the adopted strategic housing allocations

within Oldham, as established through the adoption of the Places for Everyone Plan in March 2024.

2.4 These representations intend to cover the following:

- A background to the Consortium's interest in the land at Beal Valley and Broadbent Moss and its representations;
- The case for housing delivery at Beal Valley and Broadbent Moss in relation to the Policies within the Publication Plan;
- Commentary on the soundness of Oldham Council's Publication Plan;
- The Consortium's proposed modifications to the Publication Plan; and
- The Consortium's intentions for participating at future hearing sessions.

3. Background to Representations

- 3.1 The Beal Valley and Broadbent Moss sites form two of the principal strategic development allocations within Oldham identified through Places for Everyone ("PfE"), the joint spatial development plan covering nine Greater Manchester authorities. The Plan establishes the strategic framework for housing, employment and infrastructure development across the city region to 2039.
- 3.2 The Beal Valley allocation (JPA 10) lies to the east of Royton and north of Higginshaw. The Site lies in proximity to residential neighbourhoods, to the west and north-west, while employment areas (including the Higginshaw Business Park) are located to the south. The Site lies within a strategic location, close to the Oldham-Rochdale Metrolink line, which provides an important connection between Oldham, Rochdale and central Manchester.
- 3.3 Within the PfE Plan, the Beal Valley allocation it is recognised as a site that will enable Oldham to diversify its housing stock and has the potential to meet "*local housing need in the immediate vicinity and across the borough and contribute to, and enhance, the housing mix within the area through adding to the type and range of housing available*".
- 3.4 The Broadbent Moss allocation (JPA 12) is also identified in the adopted Places for Everyone as a strategic development site within the north east of Oldham. The Site is located adjacent to existing residential neighbourhoods of Royton, Moorside and Heyside. Its location also places it within proximity to key employment areas and transport corridors, including the Metrolink line connecting Oldham to Rochdale, which runs through the allocation
- 3.5 Within the PfE spatial strategy, Broadbent Moss forms part of a strategic urban extension alongside the Beal Valley allocation. Together the two sites provide the opportunity for comprehensive development that can deliver housing, employment space, supporting services and green infrastructure. The Beal Valley and Broadbent Moss sites were identified through the PfE site selection and evidence base process as suitable locations to contribute to Oldham's housing requirement while providing opportunities to enhance connectivity and deliver strategic infrastructure.
- 3.6 The combined allocation covers approximately 169 acres of land and is intended to deliver a substantial mixed-use urban extension to Oldham. PfE identifies the sites as capable of delivering approximately 2,000 new homes, alongside supporting infrastructure and employment development. In addition to residential development, the allocations are expected to provide:

- Approximately 21,000 square metres of employment and industrial floorspace, including the extension of Higginshaw Business Park;
- A local centre providing retail, community and service uses;
- New education provision or contributions to local schools;
- Significant green infrastructure and open space networks;
- Transport and accessibility improvements, including new walking and cycling routes;
- Strategic infrastructure including a proposed Metrolink stop at Cop Road on the Oldham-Rochdale line and associated park and ride provision.

3.7 The allocation policies both include a requirement for development to be *“in accordance with a comprehensive masterplan and design code as agreed by the local planning authority. This will include the need for an infrastructure phasing and delivery strategy in accordance with JP-D1”*.

3.8 Policy JP-D1 relates to Infrastructure Implementation, and it states that, through local plans, other local planning documents and development management decisions development will *‘require applicants to prepare an infrastructure phasing and delivery strategy to be agreed by the local planning authority for sites where build out will be delivered by different developers or in phases. This strategy must outline what needs to be provided by when and who will fund and deliver it’*.

3.9 Over a period of approximately 18 months, the Consortium of house builders and developers worked closely with officers and other consultees to prepare a Masterplan and Design Code. The document has now been endorsed by the Council at Cabinet on 15th December 2025 and as such it carries planning weight.

3.10 Members determined that the Masterplan and Design Code should become a Supplementary Planning Document during 2026. Oldham Council and the Consortium have therefore jointly prepared the Draft Beal Valley and Broadbent Moss Masterplan and Spatial Design Code Supplementary Planning Document. The purpose of this document is to set out;

- *The constraints and opportunities that have helped inform the masterplan and spatial design code*
- *A vision and the main development principles for both sites*
- *An overarching masterplan and site-wide development principles*
- *A spatial design code that is split into the following:*
 - *Identity*

- *Nature and Green and Blue Infrastructure*
- *Movement and Public Realm*
- *Built Form*
- *An infrastructure phasing and delivery strategy.*

- 3.11 The masterplan framework seeks to ensure that development is delivered at the Sites alongside the necessary infrastructure, including transport improvements, green infrastructure networks and community facilities. It also establishes principles for neighbourhood layout, landscape protection and sustainable drainage, ensuring that the development responds appropriately to the valley landscape and environmental features of the area.
- 3.12 Comments on the draft SPD are invited from Monday 2nd March until Monday 30th March 2026.
- 3.13 The sites play a critical role in delivering sustainable growth for the borough while enabling investment in transport infrastructure, green infrastructure and community facilities that will benefit both new and existing residents.
- 3.14 The consortium fully endorses the Masterplan and Design Code SPD in its current form and has made representations to confirm this support.
- 3.15 Following the adoption of the PfE Plan, Kellen Homes has submitted a planning application (ref. FUL/355603/26) to Oldham Council for the proposed development of 248 affordable housing dwellings within the Broadbent Moss allocation boundary. Council members have determined that applications advancing in the interim of the Beal Valley and Broadbent Moss Masterplan and Spatial Design Code SPD being adopted should be delivered in accordance with the endorsed masterplan and design code.
- 3.16 This application is currently being assessed by officers.

4. Planning for Growth

- 4.1 The Oldham Local Plan has been aligned with the Places for Everyone (PfE) plan period, running to 2039, as it is intended to support delivery of the Joint Plan. The emerging Local Plan for Oldham focuses on non-strategic planning policies, primarily relating to development management. It will not identify new sites for future housing or employment development. Instead, the Plan provides a positive planning framework that underpins and facilitates the delivery of housing and employment land supply through its policies.
- 4.2 During preparation of the Plan, the National Planning Policy Framework ("NPPF") was updated in December 2024. The December 2024 NPPF introduced transitional arrangements allowing local planning authorities to rely on policies that deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020.
- 4.3 The Oldham Local Plan includes policies intended to deliver the housing requirement and development growth set out in the Places for Everyone joint development plan. As such, the Publication Plan has been prepared in accordance with the relevant previous version of the Framework, as set out in paragraph 235 of the NPPF. In this instance, this is the 2021 NPPF, under which PfE was examined.
- 4.4 The purpose of this Chapter is to highlight the requirements of the NPPF, as it was, on which the Publication Oldham Local Plan needs to be considered, as well as highlighting some of the relevant strategic policies with the Regulation 19 draft pertinent to The Consortium's landholdings and representations. The Consortium's commentary on whether the Publication Plan is sound in relation to these points is then contained in future Chapters.

National Planning Policy Framework

- 4.5 The NPPF (July 2021) states at Paragraph 15 that the planning system should be genuinely plan led, and that succinct and up to date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 4.6 NPPF Paragraph 16 states that plans should:
- a. be prepared with the objective of contributing to the achievement of sustainable development;*
 - b. be prepared positively, in a way that is aspirational but deliverable;*

- c. be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e. be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f. serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

4.7 Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

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

4.8 Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

Regulation 19 Oldham Local Plan– Key Strategic Policies

4.9 Vision for Building a Better Oldham: Our Local Plan Vision (page 23) states that “ *Through delivering at least 11,560 new homes of different sizes and types, including affordable housing, Oldham will have quality homes for everyone that meet the needs of Oldham’s*

residents. New homes, delivered in sustainable and accessible locations, will contribute to inclusive and vibrant communities where everyone can live”.

4.10 Plan Objective 1 sets out the Council will build quality homes to meet local needs and diversify housing offer by:

- providing for, and supporting the delivery of, at least 11,560 new homes;
- delivering a diverse housing offer to meet the needs of all residents including affordable housing and homes for families, older people and disabled people;
- ensuring the delivery of high-quality, sustainable and well-designed new homes; and
- ensuring appropriate densities and making the best and most effective use of brownfield land.

4.11 Policy H1 states that *“ The Council will promote a diverse housing offer to meet the differing needs of all Oldham’s residents. Oldham’s minimum local housing need (the number of new homes needed) is set out in Policy JP-H1 of PfE. PfE sets out that Oldham is required to deliver at least 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year”* and 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, PfE and other Local Plan policies”.*

4.12 Policy H2 notes that to achieve appropriate densities, new residential developments should achieve densities as set out in PfE Policy JP-H4.

4.13 Policy H3 details that *“new residential developments should contribute to a diverse housing mix across the borough, ensuring that Oldham’s housing needs can be met. Oldham’s Local Housing Needs Assessment (LHNA) provides evidence in relation to housing mix, including tenure, bed size and house type”* and that *“ For some developments an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:*

- I. It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;*
- II. It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;*

- III. *The development is for specialist accommodation, such as for older and/ or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or*
- IV. *There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.*

4.14 In terms of affordable housing, Policy H5 states that all developments providing 10 or more dwellings will be required to deliver an appropriate proportion of affordable housing in line with the value area in which the site is located. In line with the evidence set out in the Local Housing Needs Assessment, the tenure split for new affordable housing should be provided as follows:

- 25% affordable rented;
- 35% affordable home ownership; and
- 40% social rented.

4.15 Exemptions to this tenure mix apply where the proposed development:

- a) Provides solely for Build to Rent homes;
- b) Provides specialist housing to meet local housing needs;
- c) A specific tenure mix is required to meet funding requirements;
- d) Is exclusively for self-build or custom-build; or
- e) Is exclusively for affordable housing or is an exception site .

4.16 Policy H5 goes on to note that “ *Whilst it is important to ensure the delivery of affordable housing to meet local needs, there may be some exceptions to providing the full amount of affordable housing required (either on or off-site). The following exceptions may be acceptable, at the Council’s discretion on a case-by-case basis:*

1. *There is a high level of existing affordable housing and there is a need to diversify the housing offer in a particular location (to be agreed with the Council); and*
2. *Developments which involve the conversion or demolition of a vacant building, through the application of Vacant Building Credit (VBC), to support viability. In determining whether VBC applies, the Council will assess the evidence submitted by the applicant and its compliance with the criteria set out in PPG”.*

- 4.17 Policy IN2: Developer Contributions details that in some cases, a site specific viability assessment may be submitted where the need for such is evidenced by a change in circumstance which could not have been evident in the whole plan Viability Assessment, in line with NPPF and PPG. Where the site specific viability assessment provides evidence to demonstrate that it is not financially viable to provide the level of planning obligations proposed, reduced planning obligations will only be permitted where:
1. *the value of the planning obligations has been maximised having regard to likely viability;*
 2. *a clawback mechanism has been incorporated into the legal agreement where appropriate, to ensure that additional mitigation is provided if final development viability is better than anticipated in the initial viability assessment; and*
 3. *the benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations.*
- 4.18 In relation to the Consortium's land interests, Policy OTC4 notes that proposals will be supported that "*protect, create and enhance multi-functional Green Infrastructure within and around Oldham Town Centre, including... the creation of active travel routes across the town centre, linking it to Northern Roots and Oldham Edge, and PfE JPA12 Beal Valley and JPA14 Broadbent Moss beyond*"
- 4.19 The Publication Local Plan includes a suite of policies within the Economy and Employment chapter which seek to deliver the borough's economic growth objectives and align with the spatial strategy established through Places for Everyone. These policies focus on directing employment development towards designated Business and Employment Areas, supporting the reuse of existing assets such as mill buildings, and ensuring that sufficient land is available to meet future needs.
- 4.20 Policy E1 establishes the borough's employment floorspace requirements for the plan period, including provision for office, industrial and warehousing uses. This reflects the strategic approach set out within PfE which identifies the need to support economic growth across Greater Manchester.
- 4.21 Policy E2 directs employment development towards existing Business and Employment Areas, providing a clear spatial focus for economic activity and supporting the efficient use of land.
- 4.22 Collectively, these policies provide a positive framework for supporting economic growth.

5. Policy and Evidence Review

- 5.1 The following Chapter sets out the Consortium's key views and comments on the Publication Plan. The Consortium has not commented on every policy set out in the document, only those considered particularly relevant to their interests at Beal Valley and Broadbent Moss. The absence of comment to any further policies should not be construed as the Consortium agreeing with the approach taken.

Section 8: Homes

Housing Delivery

- 5.2 The Publication Plan sets out the requirement for the borough to deliver at least 11,560 new homes over the Plan period;

	Annual Average	2022-2025	2025-2030	2030-2039	Total
Number of Homes Required	680	404	680	772	11,560

Table H1: Phasing of Housing Requirements

- 5.3 **Policy H1** of the Publication Plan sets out that *"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 policy and guidance, PfE and other Local Plan policies"*.
- 5.4 The consortium welcomes this, as it confirms that development of sites which are allocated under PfE policy will be acceptable.
- 5.5 As set out previously within this Representation, the Publication Plan has been prepared in alignment with the 2021 publication of the NPPF, relevant development growth policies of this version have been set out within Chapter 4. The proposed housing delivery figures align with the PfE plan, a document which has been subject to extensive evidence based scrutiny and independent examination prior to its adoption. Throughout this process, the distribution of housing growth across Oldham, and Greater Manchester, were tested in detail. The adopted Plan therefore provides a detailed evidence based strategy for meeting housing needs and sustainable growth across Oldham.
- 5.6 As such, it is important that the emerging Local Plan supports the delivery of the established housing requirements and spatial strategy established through PfE, and ensures that policies

facilitate the delivery of the strategic allocations identified within the adopted Development Plan.

- 5.7 The consortium welcomes that the figure (11,560 new dwellings) is recognised as a minimum requirement over the Plan period. This principle reflects the NPPF's objective (both 2021 and 2024 version) of boosting the supply of houses and ensuring that planning policies support the delivery of sufficient housing to meet identified needs.
- 5.8 The Beal Valley and Broadbent Moss allocations represent significant and deliverable sources of housing supply within the borough over the plan period through joint public and private sector investment. As detailed within the Council's Housing Topic Paper, a substantial proportion of anticipated housing delivery is reliant on PfE allocations.
- 5.9 The emerging Local Plan has been prepared under transitional arrangements which allow it to rely on the previous version of the NPPF however, the updated version of the NPPF (December 2024) introduced a revised standard method for calculating local housing need. While the transitional arrangements allow plans that are sufficiently advanced to proceed under the previous policy framework, the revised standard method represents the Government's most up-to-date assessment approach for determining housing need.
- 5.10 In this context, future reviews of Oldham's housing requirement will need to take account of the updated standard method and the direction of travel within national planning policy towards higher levels of housing delivery.
- 5.11 It would be appropriate for the Council to commit to an early review of the Local Plan following adoption. Such a review would allow the Council to consider whether the housing requirement and spatial strategy remain consistent with national policy and with any updated assessment of housing need derived from the revised standard method.
- 5.12 Strategic allocations such as Beal Valley and Broadbent Moss have been comprehensively planned to enable the coordinated delivery of housing alongside supporting infrastructure, enhanced green and blue infrastructure, transport improvements and community facilities. It is therefore important that the Local Plan provides clear and consistent support for these allocations and ensures that policies are applied in a way that facilitates their delivery in line with the endorsed Masterplan and Design Code.
- 5.13 The Council's December 2025 Strategic Housing Land Availability Assessment (SHLAA) confirms that both allocations are progressing. It identifies that housing supply in the early years of the plan period will largely come from sites under construction and those with extant

permission, with a more limited contribution from strategic allocations. In the middle years of the plan period (2030-2035), supply is expected to be drawn from a broader mix of sources, including extant permissions, pending sites, PfE allocations and some previously stalled sites. By the later years of the plan period (2035-2039 and beyond), the SHLAA indicates that supply will rely increasingly on strategic allocations and other uncertain sources, including potential and stalled sites.

- 5.14 Regarding Beal Valley, Appendix 1 of the Housing Topic Paper sets out an expectation that the site will deliver 342 dwellings in the five years immediately following adoption of the Plan (2027/28-2031/32). A further 140 dwellings are anticipated to be completed between 2032/33 and 2039, covering the remainder of the Plan period.
- 5.15 In respect of Broadbent Moss, Appendix 1 identifies that the site is anticipated to deliver 562 dwellings within the first five years after adoption (2027/28-2031/32), followed by an additional 660 dwellings in the subsequent period through to the end of the Plan (2032/33-2039). A further 152 dwellings are projected to be completed after the Plan period, from 2039 onwards.
- 5.16 The Consortium supports the recognition that housing delivery on these allocated sites can commence early in the Plan period as evidenced by the current live application submitted by Kellen Homes (248 homes). However, further delivery on the Broadbent Moss allocation before 2031/32 will depend on unlocking a substantial phase of development from the east of the allocation off Ripponden Road.
- 5.17 These housing delivery assumptions broadly align with the Masterplan and Design Code. However, the targets for new dwellings and community facilities within the Broadbent Moss allocation beyond 2032/33 will depend on significant site preparation and east-west infrastructure works being viable and deliverable. It is therefore considered appropriate that delivery is set out in detail in the Masterplan and Design Code and the SHLAA rather than the Local Plan itself.
- 5.18 The consortium welcomes the Local Plan's recognition that the delivery of PfE strategic allocations forms a key component of the borough's housing supply. Policy wording could however be more explicit that housing delivery will be focused on the implementation of these allocations and that proposals consistent with them will be supported in principle and be a priority in terms of infrastructure support.

Housing Densities

5.19 Publication **Policy H2** details the proposed minimum densities for residential developments within Oldham have been prepared in accordance with PfE Policy JP-H4. The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported however, these densities should not restrict development coming forward in circumstances where site specific characteristics do not allow these figures to be achieved.

5.20 Exceptions are identified as:

- to meet a funding requirement or to deliver a particular housing need;
- to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and
- to provide for specialist housing accommodation (i.e. extra care housing, bungalows).
The Council will assess this on a site-by-site basis and only allow exceptions where necessary.

5.21 The exceptions provided in H2 which allow for flexibility in terms of density are welcomed by the consortium. It is considered the policy could however be bolstered by referencing that alternative densities will be considered acceptable where identified in endorsed masterplans / Supplementary Planning Documents, or their subsequent equivalents (such as the example of the Masterplan and Design Code for Beal Valley and Broadbent Moss).

Housing Mix

5.22 Oldham's Publication Local Plan details within **Policy H3** that new residential development should contribute to a diverse housing mix across the borough, ensuring that Oldham's housing needs can be met. The overall recommended dwelling type/size and mix are set out within Table H3 of the Publication Plan and have been extracted below;

Dwelling type/size	Market	Affordable/ Social rented	Affordable home ownership	Total
Overall % split	80%	12%	8%	100%
Dwelling type				
House	70-75%	35-40%	65-70%	60-65%
Flat	2-5%	30-35%	15-20%	10-15%
Bungalow/level-access	25-30%	30-35%	15-20%	25-30%
Size (bedrooms)				
1 to 2	30-35%	70-75%	35-40%	40-45%
3	40-45%	20-25%	40-45%	35-40%
4+	25-30%	5-10%	20-25%	20-25%

5.23 The Policy notes that;

For some developments an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:

- 1. It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;*
- 2. It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;*
- 3. The development is for specialist accommodation, such as for older and/ or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or*
- 4. There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.*

- 5.24 The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains viable and deliverable and that housing mix should not be restricted to the mix set out in Table H3. The consortium suggests criterion 2 should list viability as one of the 'distinct characteristics'.
- 5.25 Strategic allocations such as the Beal Valley and Broadbent Moss sites will be delivered over the Plan period and potentially beyond and will involve multiple development parcels, housebuilders and phases of development. As such, it will be necessary for the detailed housing mix to respond to a range of factors including site design, market demand, infrastructure provision and viability considerations. Flexibility will be key.

Affordable Housing

- 5.26 Publication **Policy H5** states that the Local Plan will ensure that a diverse type and tenure of affordable housing will need to be delivered to accommodate all households in need. All developments that provide 10 or more net additional homes, will be required to deliver an appropriate portion of the total site capacity as affordable housing in line with the value area in which the site is located and the land type, as set out in Table H4;

Value Area	Brownfield Land	Greenfield Land
High Value	20% of site capacity	25% of site capacity
Medium and Low Value	10% of site capacity	10% of site capacity

- 5.27 The map defining the value areas is very high level and it is challenging to determine precise boundaries at a sufficient level of detail. It would appear however that Beal Valley and Broadbent Moss allocations are both located within value areas where 10% of the site capacity should be delivered as affordable housing and the Consortium would support that level of provision.
- 5.28 The Publication Plan notes that developments should provide affordable housing onsite however, by exception, it may be more appropriate, in meeting local needs for the payment of a commuted sum/ developer contribution to off site provision, or a mixture of onsite/off site provision. Off site contributions should provide the number of units that would have been delivered on site.

- 5.29 The principle of delivering affordable housing through new residential development is supported. Ensuring that development contributes towards meeting the borough's affordable housing needs is an important component of delivering balanced and sustainable communities.
- 5.30 It is noted that the quantity of homes required to trigger affordable housing requirements at sites has decreased from 15 dwellings (Adopted Oldham Joint Core Strategy and Development Management Policies DPD Policy 10) to 10 dwellings. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites and in accordance with national policy and guidance.
- 5.31 Strategic allocations such as Beal Valley and Broadbent Moss are expected to deliver a substantial number of homes over an extended period and could involve significant infrastructure investments. It is important that affordable housing requirements are therefore applied in a manner that takes account of site-specific viability considerations and the infrastructure requirements associated with large scale strategic developments.
- 5.32 The consortium therefore supports the policy and particularly welcomes the acknowledgement that affordable housing can be delivered by the use of planning conditions.

Section 9: Economy and Employment

Employment Provision

- 5.33 The Publication Local Plan sets out the Council's ambition to help create the conditions in which businesses can invest, expand and adapt, in line with the NPPF. The document notes that by attracting new investment, supporting local businesses and leading in green technologies, the Council will generate quality job opportunities and equip people with the skills they need to succeed.
- 5.34 Publication Plan **Policy E1** details that in order to achieve the overall employment floorspace requirements for Oldham, at least 57,481m² of office (E(g)(i)) floorspace and at least 240,656m² of industrial and warehousing (B2 and B8) floorspace will be provided before 2039.
- 5.35 The proposed employment floorspace figures broadly reflect the strategic framework established through PfE, which has been subject to extensive evidence based analysis prior to its adoption. Through this process, the distribution of employment growth across Oldham

and the wider Greater Manchester area was tested in detail. The adopted plan therefore provides a robust and evidence based strategy for supporting economic growth and meeting employment needs across the borough. It is noted within the Publication Plan however, that the PfE plan does not explicitly set out district level employment requirements for individual authorities. Tables 6.1 and 6.2 of PfE (Policies JP-J3 and JP-J4) identify the overall distribution of office, industrial and warehousing supply across the PfE authorities but do not detail specific floorspace targets for each district;

Within PfE, tables 6.1 (JP-J3) and 6.2 (JP-J4) set out the distribution of the identified supply for offices and industry and warehousing across the PfE districts. However, PfE does not set out distributed requirements for offices and industry and warehousing floorspace.

As such, this policy sets out Oldham's employment floorspace requirements for the Local Plan period (2022-2039) of at least 57,481m² of office floorspace and at least 240,656m² of industrial and warehousing floorspace. This is to ensure that Oldham makes a sufficient contribution to meeting the overall PfE plan area employment requirements identified in policies JP-J3 and JP-J4

	Total PfE supply	Total Oldham (only) supply	Oldham's supply as a % of PfE total supply	Minimum PfE Requirement	Oldham's 'Requirement' based on % of PfE supply
Office	2,880,150	81,998	3%	2,019,000	57,481
Industry and Warehousing	4,100,571	278,922	7%	3,513,000	240,656

Table E1: Methodology used to calculate Oldham's employment land requirement

- 5.36 The Publication Plan explains that this approach reflects the methodology previously proposed by the PfE authorities through the Main Modifications stage of the PfE examination. Ultimately, the Inspectors concluded that such modifications were not necessary to make the joint plan sound, as national policy does not require joint plans to set district level employment requirements. Notwithstanding this, it is important that the emerging Local Plan supports the delivery of the employment growth objectives and spatial strategy established through PfE, and ensures that its policies facilitate the delivery of development within strategic allocations identified within the adopted Development Plan. It is also important that the floorspace targets set out within Policy E1 are recognised as minimum requirements over the Plan period.

- 5.37 The Broadbent Moss allocation identified through PfE is expected to deliver approximately 21,000sqm of industrial and warehousing floorspace as an extension to the existing Higginshaw Business and Employment Area. This development will form an important component of Oldham's future employment land supply and will contribute significantly towards meeting the borough's employment floorspace requirements. Whilst the proposed employment development will not be developed on land owned by the Consortium members, the proposals to remediate and deliver the new floorspace are supported.

Section 10: Our Centres

Local Services

- 5.38 The Council recognises in **Policy C4** that locally available services contribute towards vibrant communities through the provision of facilities near people's homes, reducing the need to travel and providing valuable services for less mobile members of the community.
- 5.39 The Consortium supports the Council's recognition of the role of local centres and, through their draft Spatial Principles SPD, has placed strong emphasis on delivering new community amenities. They are committed to delivering a local centre that will include a range of facilities. This community 'hub' will serve both new and existing residents. The guiding principle is to ensure the hub sits at the heart of the new neighbourhood and is within a 15-20 minute walk for all homes across the two sites.

Section 11: Oldham Town Centre & Section 14: Addressing the Biodiversity Emergency

Green Infrastructure Network

- 5.40 As set out in Publication **Policy OTC4**, the Council will support proposals which will create, protect and enhance multi-functional Green Infrastructure within and around Oldham Town Centre, including " *the creation of active travel routes across the town centre, linking it to Northern Roots and Oldham Edge, and PfE JPA12 Beal Valley and JPA14 Broadbent Moss beyond*". The aim of this is to create a link of green spaces that will create active travel routes, and strategic landscapes, reaching from the town centre and beyond. The consortium supports this policy, recognising the significant benefits which green infrastructure can provide to human health.
- 5.41 **Policy N2** further sets out the Council's ambition to achieve a biodiversity net gain across the borough. Development should seek to protect and enhance existing habitats, and provide

opportunity for the strategic creation of new habitats. The Consortium fully support the Council's BNG ambitions across the borough, which can be seen reflected within the endorsed Masterplan and Design Code. Biodiversity will be brought into the development parcels through the inclusion where possible of SuDS, roadside verges, hedgerows and street trees. These provide benefits to people (including reducing flooding and cooling the streetscape) as well as to wildlife.

5.42 The development will follow the mitigation hierarchy to provide the maximum benefit for biodiversity. Where a feature of the development is identified as likely to harm local ecology this should first be avoided through changing the design or removing the feature which caused the harm. If this is not possible then the harm should be mitigated. The consortium is comfortable with these principles.

5.43 Publication **Policy N3** further notes that new development is expected to make an appropriate contribution to addressing local needs and opportunities for Green Infrastructure provision by retaining, enhancing and creating green spaces and corridors. Development for 20+ homes or non-residential development of 1,000m²+ will be required, where appropriate to:

- i. Enhance the landscape setting of the site by improving the character, appearance and condition of access corridors into the site, gateways, settlement edges and landscape features, including historic environment assets;
- ii. Enhance pedestrian and cycle connectivity between residential areas, town centres, schools and workplaces, outdoor sports, tourism and recreational facilities, public transport services and the countryside around the site; and
- iii. Facilitate for the production of food (e.g. allotments and community gardens) within residential or mixed-use developments.

5.44 The Consortium support the Council's proposals, as set out within the Beal Valley & Broadbent Moss Spatial Design Code. The Consortium has incorporated a vast green infrastructure network within the Masterplan proposals, which wraps around the development parcels and retains the particular character related to the area. Green infrastructure covers c. 50.85 hectares (61%) of the masterplan area and can be accommodated for play areas, informal amenity use and new ecological habitats.

5.45 Within their design approach, the Consortium have provided a connected network of hierarchical routes for all forms of transport, creating a strong circulatory system. This is key to the sustainability and safety of each neighbourhood and its interconnectivity out to surrounding neighbourhoods and the wider settlement. The street and public realm network is a crucial element in the delivery of the whole development as it is long lasting and, as with

historic towns, far outlast the buildings that will enclose it. Routes are direct, ensuring people can make efficient journeys. Direct, well designed and legible routes make walking and cycling more attractive and with increased activity comes a greater perception of safety.

- 5.46 The aim of the proposed masterplan, in terms of GI, is to retain key existing assets, restore and enhance existing habitats and create new ones of value whilst also performing the functions of creating public open spaces for the community to enjoy with a sustainable drainage (SuDS) network that efficiently drains the development by managing water on site, before safely discharging it at agreed greenfield run-off rates to the surrounding network of watercourse

Section 12: Addressing Climate Change

Renewable Energy

- 5.47 In line with **Policy CC1**, proposals for renewable and low-carbon energy development will be supported provided they do not cause adverse effects on the surrounding environment or harm local amenity.
- 5.48 The Consortium agree with this view and have exemplified within their endorsed Masterplan and Design Code the importance of a fabric first approach to maximise energy efficiency. Reducing embodied energy is achieved by using low energy materials, recycling, efficient use of materials, reducing waste, designing buildings that can be easily disassembled and designing buildings that are easily adaptable. All these elements must be taken into account during the design and detailing of the layout and the proposed homes.

Flood Risk and Drainage

- 5.49 **Policies CC2** and **CC3** detail the Council's approach to development, and the associated impact to increased flood risk and associated drainage. The Consortium recognise that these two issues are instrumental to bringing forward sustainable development and that they should be managed appropriately across development sites to reduce risk. The principle of locating development in areas which are at lowest risk of flooding is supported., as is the need to prepare Flood Risk Assessments to support planning applications.
- 5.50 It is noted that CC3 states that 'For any development proposal which is part of a wider development / allocation, foul and surface water strategies will be part of a holistic site-wide drainage strategy'. Whilst the consortium understands the intention of this policy strand, it should however also be recognised that in larger allocations some strategies may not be site-wide due to reasons such as site topography, distance and other constraints or opportunities

which provide merit in standalone strategies. It is suggested that the policy strand should be reworded to reflect this, adding flexibility.

Section 13: Natural Environment and Open Land

Green Belt

- 5.51 Publication **Policy OL2** stresses the importance of preserving the openness and permanence of Oldham's Green Belt, in line with national policy. Within the Green Belt, national planning policy will be applied including the refusal against inappropriate development except in very special circumstances.
- 5.52 It is noted that both the Beal Valley and Broadbent Moss strategic allocations include areas of retained Green Belt land within and adjacent to the wider allocation areas following the adoption of Places for Everyone and the associated amendments to Green Belt boundaries. Through the PfE process, the boundaries of the Green Belt were reviewed and amended where necessary to enable the delivery of sustainable growth across Greater Manchester.
- 5.53 The Consortium supports the overall objectives of Publication Policy OL2 and recognises the important role that the Green Belt plays in preventing urban sprawl, safeguarding the countryside from encroachment, and preserving the setting of settlements.

Section 16: Achieving High Quality Design

Design

- 5.54 High quality design standards will be expected from all development in accordance with Publication **Policy D1**. The policy makes specific reference to the fact that "*proposals for strategic development should be supported by a design-led masterplan or framework and, where appropriate, a site specific design code to show how it achieves the principles above*".
- 5.55 This approach is supported by the Consortium. Ensuring that strategic development is guided by a comprehensive design led masterplan and design code is an important mechanism for securing high quality placemaking, coordinated infrastructure delivery and new communities.
- 5.56 In the case of the Beal Valley and Broadbent Moss strategic allocations identified within PfE, a detailed masterplan framework has already been prepared which establishes a spatial framework for the development of the sites, including development parcels, movement networks, green infrastructure corridors, landscaping, and design principles. It also sets out

guidance on built form, density, street hierarchy and public realm, ensuring that development across the allocations is delivered in a coordinated and design-led manner.

- 5.57 The document provides the appropriate mechanism through which the design principles of Publication Policy D1 can be applied in a site specific manner.

Section 17: A Sustainable, Active, Accessible Network for Oldham

Accessibility

- 5.58 **Policies T1** and **T2** detail that the Council will seek opportunity to help improve the connectivity of Oldham, and encourage the movement of people in sustainable and efficient ways.
- 5.59 The Local Plan supports the delivery of the Oldham Transport Strategy by ensuring new developments lead with active travel and provide safe access for all. Furthermore, the Council will support new or improved travel hubs and park and ride facilities where they demonstrate a clear potential to increase public transport and reduce private vehicle reliance across the borough's highway network.
- 5.60 These ambitions are central to the delivery of the Beal Valley and Broadbent Moss allocations. Policies for these sites require a new Metrolink stop and associated park and ride facilities, ensuring masterplans fully integrate these connections. The Consortium has proposed a new Metrolink stop and Travel Hub at Cop Road, positioned as a sustainable 'hub' of commercial and community facilities for both new and existing residents. Centrally located along the Link Road, this interchange will provide connections between Metrolink, bus services, and dedicated parking, facilitating travel north to Rochdale, south to Oldham Town Centre, and onwards to Manchester.
- 5.61 The design of the Link Road ensures it can accommodate high quality bus services, with the goal that no resident or business is more than a five minute walk from a stop. Additionally, a comprehensive network of footpaths and cycleways will provide direct, sustainable links between residential neighbourhoods, local centres, employment areas, and the surrounding countryside.
- 5.62 The consortium therefore supports the inclusion of Policies T1 and T2 and the allocations are very well placed to deliver these.

Section 18: Communities

Community Facilities

- 5.63 Securing sufficient education provision is supported by **Draft Policy CO5**, which states that where residential development of 10 dwellings or more would create a shortfall in local school places, the Council will seek to secure new and/or improved education facilities. This is intended to address unmet need proportionate to the number of children and young people likely to be generated by the development.
- 5.64 Provision is expected to be secured either through financial contributions towards the expansion of existing education facilities, in agreement with the local education authority, or through on site provision where this is necessary. Where it is not practicable or desirable to address the need through expansion of existing facilities, the Council will work with developers to secure the provision of land to accommodate new education infrastructure as part of the development. The consortium confirms its support for this policy, where there is a proven need for additional education places.

Section 20: Infrastructure and Delivery in Oldham

Planning Obligations

- 5.65 The requirement for planning obligations is set out within **Policy IN2** of the Plan. The policy confirms that where development would generate additional demand for infrastructure, services and facilities beyond existing capacity, appropriate provision and/or financial contributions will be required to mitigate those impacts. This may include the provision of infrastructure onsite or, where more appropriate, contributions towards new or enhanced provision off-site.
- 5.66 The consortium supports this policy, and the Masterplan and Design Code sets out how this can be achieved. That said, the level of supporting infrastructure – especially to the east of the Broadbent Moss allocation – to meet the PfE allocation policy objectives is such that public sector assistance is likely to be required.
- 5.67 The approach set out in Policy IN2, which allows for the combining of Section 106 contributions, is supported. This provides an appropriate mechanism to ensure that financial contributions can be directed towards strategic infrastructure projects that support the delivery of the allocation as a whole, including transport improvements, education provision, green infrastructure and community facilities.

- 5.68 It is also important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability. Policy IN2 confirms that, where justified, a site specific viability assessment may be submitted where there has been a material change in circumstances that was not evident at the time of the whole plan viability assessment, in accordance with national policy set out in the National Planning Policy Framework and Planning Practice Guidance.
- 5.69 Where such assessments demonstrate that it is not financially viable to deliver the full extent of planning obligations, the policy allows for reduced obligations to be considered, subject to appropriate safeguards. These include ensuring that the value of planning obligations has been maximised having regard to viability. The consortium supports this. The inclusion however of clawback mechanisms will not always be appropriate and the consortium welcomes that this will only be sought 'where appropriate'.

6. Tests of Soundness

6.1 Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound.

6.2 The tests of soundness are set out in the NPPF, December 2021 (para 35), which states:

“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

6.3 The Consortium have prepared the below comments regarding the soundness of the Publication Local Plan under the four headings used in the NPPF.

Positively Prepared

6.4 For a plan to be “positively prepared”, it must be based on a strategy which, as a minimum, seeks to meet objectively assessed development and infrastructure requirements, and is informed by agreements with other authorities. The consortium is content the Publication Local Plan is positively prepared in that it seeks to deliver the housing and employment growth identified through the adopted Places for Everyone. The inclusion of policies supporting the delivery of at least 11,560 homes between 2022 and 2039 reflects the borough’s contribution to meeting Greater Manchester’s strategic housing requirements.

- 6.5 The Plan could be bolstered by explicitly identifying and supporting categorically the delivery of strategic allocations identified through PfE, including Beal Valley and Broadbent Moss, recognising their important role in meeting housing and employment needs across the borough.

Justified

- 6.6 The NPPF states that for a plan to be “justified”, it must be an appropriate strategy when considered against the reasonable alternatives, and must be based on proportionate evidence.
- 6.7 The spatial strategy of the Publication Plan is justified as it aligns with the strategy established through PfE, which has been subject to extensive evidence base analysis and independent examination prior to its adoption. Strategic allocations such as Beal Valley and Broadbent Moss were identified through a comprehensive site selection process and were tested through the PfE examination process. These allocations therefore represent appropriate, sustainable and justified locations for accommodating growth within Oldham.

Effective

- 6.8 The NPPF states that for a plan to be “effective”, it must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 6.9 The Publication Local Plan relies significantly on the already tested PfE. Its policies set out how PfE requirements can be achieved over the Plan period. While some development will likely extend beyond the Plan period, the consortium considers it to be effective.

Consistent with National Policy

- 6.10 The NPPF states that for a plan to be consistent with National Policy, it must enable the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 6.11 The Publication Plan aligns with national policy objectives set out in the National Planning Policy Framework, including the need to significantly boost the supply of homes, support sustainable economic growth and promote high quality design. The Plan should ensure that its policies support the efficient use of land and allow appropriate flexibility in the application of density, housing mix and affordable housing requirements where this is necessary to maintain the viability and deliverability of development. Ensuring that the Plan supports the

implementation of the PfE strategic allocations will also help ensure consistency with national policy objectives relating to sustainable development.

6.12 The NPPF has undergone several updates since 2021, with the most recent version published in December 2024. While some refinements have been introduced, the overarching policy direction concerning housing delivery, sustainable development and plan-making remains broadly consistent with the 2021 Framework. As such, although the Publication Plan has been prepared with reference to the 2021 NPPF, the conclusions reached regarding its consistency with national policy would remain unchanged when considered against the latest 2024 iteration.

6.13 The consortium is content the Local Plan is consistent with National Policy.

7. Participation at Hearing Sessions

- 7.1 The Consortium confirms that it would wish to take part in any relevant Hearing Session(s) as part of the Local Plan Examination in Public.

8. Conclusion

- 8.1 The Consortium supports the overall direction of the Publication Oldham Local Plan and its alignment with the spatial strategy established through the adopted Places for Everyone plan.
- 8.2 Strategic allocations such as Beal Valley and Broadbent Moss will play a critical role in delivering sustainable growth within the borough by providing new homes, employment opportunities, supporting infrastructure and high-quality green infrastructure.
- 8.3 The Publication Plan provides a strong foundation for delivering this growth however, and the Consortium considers that the Publication Local Plan will provide a sound policy framework for delivering sustainable development across Oldham and supporting the implementation of the PfE spatial strategy.

From: Cait O'Dowd - AshtonHale [REDACTED]
Sent: 27 March 2026 13:24
To: SPI Consultations
Cc: Richard Barton - AshtonHale
Subject: Oldham Local Plan: Publication Plan- Representations on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell
Attachments: FINAL Representations to Oldham Council Reg19 Consultation- 270326.pdf;
Representation_Form_Amended_for_extended_consultation_period_FINAL RB.pdf

Dear Sir/ Madam,

I am writing to formally submit representations on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell in response to the Oldham Council Local Plan Regulation 19 Consultation.

Please find attached a letter which sets out comments relating to this consultation. CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell request that the contents of this letter be taken into account as part of the review process.

I would be grateful if you could confirm receipt of this submission, and request that we are kept updated with the future progress of the Local Plan.

Many thanks,

Cait

Cait O'Dowd

Planner
AshtonHale

[REDACTED]
A: ABC Buildings, 21-23 Quay Street, Manchester, M3 4AE
O: [Website](#) / [LinkedIn](#)



AshtonHale Ltd ("AshtonHale") is a Limited Company registered in England and Wales with registration number 14853239. Although AshtonHale has taken reasonable precautions to ensure no viruses are present in this email, AshtonHale cannot accept any responsibility for any loss or damage sustained as a result of computer viruses and the recipient must ensure that the email (and attachments) are virus free.

This message, including any document or file attached, is intended only for the addressee and may contain privileged and/or confidential information. Any other person is strictly prohibited from reading, using, disclosing or copying this message. If you have received this message in error, please notify the sender and delete the message.

Please also be aware that the presence of a signature or footer on this email does not constitute agreement or a signature of any contract for the purposes of sale, administration or transfer of land. Any such agreements must be made through appointed legal representatives. Thank you.



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		
First Name		Richard
Last Name	CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell c/o Carpenter Rees of 11 Ashbrook Office Park, Longstone Road, Manchester, M22 5LB	Barton
Job Title (where relevant)		
Organisation (where relevant)		AshtonHale Ltd
Address Line 1		ABC Building
Line 2		Quay Street
Line 3		Spinningfields
Line 4		Manchester
Post Code		M3 4AE
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? Please refer to the enclosed Representations Document.

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

4. Do you consider the Local Plan is: Please refer to the enclosed Representations Document.

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

Please tick as appropriate

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

Please refer to the enclosed Representations Document.

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

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

Please refer to the enclosed Representations Document.

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

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

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

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

☐

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

☒

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

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:

Please refer to the enclosed Representations Document.

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

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

☒
☒
☒

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

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

The Adoption of the Oldham Local Plan.



AshtonHale

Representations to Oldham Council's Local Plan Regulation 19 Consultation on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell

Bee Mill, Royton

March 2026

Contents

1.	Executive Summary	3
2.	Introduction	4
3.	Background to Representations.....	5
4.	Planning for Growth.....	8
5.	Policy and Evidence Review	14
6.	Tests of Soundness	25
7.	Proposed Modifications.....	28
8.	Participation at Hearing Sessions.....	30
9.	Conclusion	31

Appendices

Appendix I Site Location Plan

Report title: Representations to Oldham Council's Local Plan Regulation 19 Consultation

Prepared by: COD/RB

Status: Final

For and on behalf of AshtonHale Limited

1. Executive Summary

- 1.1 These representations are submitted on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (hereby referred to as “the Site owners”) in respect of land interests at Bee Mill, Royton, Oldham (“the Site”).
- 1.2 The Site Owners currently continue to support the ongoing operation of existing businesses at Bee Mill and recognise the Site’s role in supporting local employment however, they consider it important that the Local Plan provides flexibility to respond to future circumstances. As such, the Site owners objects to the continued designation of the Site as part of Business and Employment Area BEA8 (Shaw Road) and instead believe that Bee Mill represents a suitable and sustainable location for residential development in the future, should the site become available through relocation, business restructuring, or other unforeseen changes.
- 1.3 Bee Mill is a previously developed, site located within a sustainable and accessible area, surrounded predominantly by residential development and well connected to services, public transport and key infrastructure. The existing buildings are outdated, constrained, and fail to meet contemporary operational requirements.
- 1.4 As such, Bee Mill presents a logical opportunity to contribute towards housing delivery over the plan period, particularly in the medium to long term. The Site Owners therefore do not seek to undermine the continued use of the site for employment at present, but instead promote a more flexible policy approach which recognises the site’s potential for future residential redevelopment where appropriate.
- 1.5 Its redevelopment would align with national planning policy objectives to prioritise brownfield land and deliver housing in sustainable locations. The Site achieves a strong accessibility rating and is well placed to support a high quality residential scheme that would integrate with the surrounding area.
- 1.6 The Publication Plan fails to maximise the contribution of suitable brownfield land, relies on evidence that is not up to date, and does not provide a justified or effective strategy for the Site. The Site owners therefore propose that Bee Mill is removed from BEA8 to allow flexibility of land use at the site within the future. If housing delivery were to come forward at the location, the Site would deliver significant benefits, including environmental enhancements and an improved relationship with surrounding residential areas, representing a logical and sustainable alternative to its current allocation.

2. Introduction

- 2.1 These representations have been prepared by AshtonHale Ltd on behalf of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell (hereby referred to as “ the Site owners”) in response to the Oldham Council Local Plan Regulation 19 Consultation.
- 2.2 These representations relate to the Site owners land interests at Bee Mill (“the Site”). The Site is currently occupied by Patterson & Rothwell, who operate from the premises for injection and plastic moulding purposes, comprising a traditional B2 (general industrial) and B8 (storage and distribution) use. The Site is additionally occupied by Ultimate Building Products Limited.
- 2.3 Bee Mill was originally constructed in 1901 by the Bee Spinning Co (Royton) Ltd, with a capacity of 102,216 spindles on Platt machines and powered by a 1,500 horsepower engine manufactured by George Saxon. Textile production ceased in 1964, after which the Site was repurposed for foam block manufacturing.
- 2.4 The Site was acquired by the local authority in 1985, at which point the upper floors of the original mill building were removed. It was subsequently occupied by Slumberland for a period and is now operated by Patterson & Rothwell and Ultimate Building Products Limited.
- 2.5 A plan showing the Site owners land interests is attached at Appendix I.
- 2.6 These representations intend to cover the following:
- A background to the Site owners interests at Bee Mill;
 - The case for housing delivery at the Bee Mill site in relation to the policies contained within the Publication Plan;
 - Commentary on the soundness of Oldham Council’s Publication Plan;
 - the Site owners proposed modifications to the Publication Plan;
- 2.7 Whilst a standalone document has been submitted to Oldham Council via email, a version of this text has also been submitted online via the Council’s online consultation portal.

3. Background to Representations

Site Summary

- 3.1 Bee Mill is entirely under the ownership of CRJ Trustees Ltd, Lee Tilley, Christine Tilley and Alan Rothwell , who seek to promote the viable site for alternative residential use.
- 3.2 The Bee Mill site is located approximately 2.5km north of Oldham Town Centre, and around 0.7km south east of Royton. The site is bound by Shaw Road to the north, which directly links the site to Shaw and to the A627. To the north and east, the site is contained by industrial and commercial development, nearby uses include an MOT centre, an engineering facility and a furniture shop. To the south and west of Bee Mill, development primarily comprises of residential development. A green infrastructure recreational route bounds the south west boundary of the site.
- 3.3 Beyond the site's immediate boundaries, development to the east, south and west is predominantly established residential in nature, and the site lies in proximity to the strategic allocations of Beal Valley and Broadbent Moss (c. 1km to the east) which will add to the residential character of the area through future strategic development.
- 3.4 The Bee Mill site extends to approximately 7.06 acres and comprises previously developed land. The two storey mill building is located along the site's north east boundary and dates to the early 1900s.

Site Aspirations

- 3.5 Bee Mill forms a part of a proposed Business and Employment Area (Policy E2 that is referred to as Area BEA8 (Shaw Road)) within the Regulation 19 Publication Local Plan document.
- 3.6 The Site Owners' intention is to continue supporting the existing employment uses at Bee Mill in the short to medium term however, it is important that the Local Plan recognises the Site as a potential future residential opportunity, should circumstances change, including relocation of existing businesses, changes in operational requirements, or site disposal.
- 3.7 This approach would ensure the Plan remains flexible over its lifetime, whilst safeguarding a sustainable brownfield site for future housing delivery.

Key Site Considerations

Highways and Accessibility

- 3.8 The Site, has strong connections to local services and facilities. The Site lies adjacent to the A663 (Shaw Road), linking the Site to key locations such as Shaw, Oldham Town Centre and Royton.
- 3.9 Furthermore, the Site is situated in proximity to both north and southbound bus stops along Shaw Road. These are served by the 403 and 837 services, providing access to Oldham, Chadderton Park, Shaw and Rushcroft. The Derker Metrolink stop is located c. 1.4 miles to the south of the Site, and Shaw and Crompton Metrolink stop is situated c. 1.5 miles north east.

Heritage

- 3.10 There is no designated heritage assets associated with the site or within the curtilage of the site boundaries. The closest heritage asset to the Site is located outside the northern boundary, this is Grade II Lion Mill.
- 3.11 Bee Mill has been included within Oldham Council's 2021 Mill Strategy Report. Within this document, the mill is identified as a low heritage value category mill, which fabric and setting has been considerably altered. Replacing the existing employment use with a sensitively designed residential development offers the potential to positively enhance the area's residential character, while also preserving, and where possible improving, the setting of the adjacent Lion Mill.

Ecology

- 3.12 The site does not fall within any designated nature conservation or geodiversity area. A designated Green Corridor runs along the south west boundary of the site.

Key Services

- 3.13 All necessary services and utilities are located within close proximity to the Site's boundary. Amenities in proximity to the Site have been summarised below:
- St Anne's CE Primary School, 0.9 miles from the site
 - Beever Primary School, 1.6 miles from the site
 - The Blue Coat School, 1.6 miles from the site
 - Mayfield Primary School, 1.8 miles from the site
 - Springfield House Medical Centre, 2.1 miles from the site
 - Hopwood House Surgery, 2.0 miles from the site
 - Co-Op Food, 0.8 miles from the site

- Lidl Supermarket, 0.8 miles from the site.

Amenity and Surrounding Land Use

- 3.14 The Site owners and occupiers have an established relationship with surrounding residential properties and have taken proactive steps to manage potential impacts arising from ongoing operations.
- 3.15 This includes restricting the use of stacker trucks to between 07:00 and 19:00, making changes to equipment to help reduce noise, adjusting external lighting to avoid light spill towards neighbouring properties, and engaging with residents on matters such as boundary treatments and tree management, trying to balance differing views where possible.
- 3.16 These steps have been taken voluntarily as part of an ongoing effort to be considerate neighbours. It is also important to note that the industrial use of the Site has been in place long before the surrounding residential development. Despite this, the Site Owners have continued to respond positively to concerns and look for ways to reduce impacts.
- 3.17 Despite the above, the need for these ongoing measures highlights the underlying tension between the industrial use of the Site and the now largely residential nature of the surrounding area. In that context, although the Site continues to operate, its long term use for industrial purposes is becoming less well suited to its surroundings. A move over time towards a more compatible use, such as residential, would better reflect the character of the area and help avoid ongoing conflicts with neighbouring properties.

4. Planning for Growth

- 4.1 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. Oldham's emerging Local Plan has been prepared to focus on non-strategic planning policies that deal with primarily development management matters, and will not include allocations for future development, whether that be for new homes or employment. Instead, the Plan supports the delivery of housing and employment land supply through the positive planning framework provided by the plan policies.
- 4.2 During preparation of the Plan, the National Planning Policy Framework ("NPPF") was updated in December 2024. The December 2024 NPPF introduced transitional arrangements allowing local planning authorities to rely on policies that deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020.
- 4.3 The Oldham Local Plan includes policies intended to deliver the housing requirement and development growth set out in the Places for Everyone joint development plan. As such, the Publication Plan has been prepared in accordance with the relevant previous version of the Framework, as set out in paragraph 235 of the NPPF. In this instance, this is the 2021 NPPF, under which PfE was examined.
- 4.4 The purpose of this Chapter is to highlight the requirements of the NPPF, as it was, on which the Publication Oldham Local Plan needs to be considered, as well as highlighting some of the relevant strategic policies with the Regulation 19 draft pertinent to the Site owners landholdings and representations. The Site owners commentary on whether the Publication Plan is sound in relation to these points is then contained in future Chapters.

National Planning Policy Framework

- 4.5 The NPPF (July 2021) states at Paragraph 15 that the planning system should be genuinely plan led, and that succinct and up to date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 4.6 NPPF Paragraph 16 states that plans should:

- a. *be prepared with the objective of contributing to the achievement of sustainable development;*

- b. be prepared positively, in a way that is aspirational but deliverable;*
- c. be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e. be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f. serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

4.7 Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

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

4.8 Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

Regulation 19 Oldham Local Plan– Key Strategic Policies

4.9 Vision for Building a Better Oldham: Our Local Plan Vision (page 23) states that “ *Through delivering at least 11,560 new homes of different sizes and types, including affordable housing, Oldham will have quality homes for everyone that meet the needs of Oldham’s*

residents. New homes, delivered in sustainable and accessible locations, will contribute to inclusive and vibrant communities where everyone can live”.

4.10 Plan Objective 1 sets out the Council will build quality homes to meet local needs and diversify housing offer by:

- providing for, and supporting the delivery of, at least 11,560 new homes;
- delivering a diverse housing offer to meet the needs of all residents including affordable housing and homes for families, older people and disabled people;
- ensuring the delivery of high-quality, sustainable and well-designed new homes; and
- ensuring appropriate densities and making the best and most effective use of brownfield land.

4.11 Policy H1 states that “ *The Council will promote a diverse housing offer to meet the differing needs of all Oldham’s residents. Oldham’s minimum local housing need (the number of new homes needed) is set out in Policy JP-H1 of PfE. PfE sets out that Oldham is required to deliver at least 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year” and 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, PfE and other Local Plan policies”.*

4.12 Policy H2 notes that to achieve appropriate densities, new residential developments should achieve densities as set out in PfE Policy JP-H4.

4.13 Policy H3 details that “*new residential developments should contribute to a diverse housing mix across the borough, ensuring that Oldham’s housing needs can be met. Oldham’s Local Housing Needs Assessment (LHNA) provides evidence in relation to housing mix, including tenure, bed size and house type” and that “ For some developments an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:*

- I. It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;*
- II. It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;*

- III. *The development is for specialist accommodation, such as for older and/ or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or*
- IV. *There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.*

4.14 In terms of affordable housing, Policy H5 states that all developments providing 10 or more dwellings will be required to deliver an appropriate proportion of affordable housing in line with the value area in which the site is located. In line with the evidence set out in the Local Housing Needs Assessment, the tenure split for new affordable housing should be provided as follows:

- 25% affordable rented;
- 35% affordable home ownership; and
- 40% social rented.

4.15 Exemptions to this tenure mix apply where the proposed development:

- a) Provides solely for Build to Rent homes;
- b) Provides specialist housing to meet local housing needs;
- c) A specific tenure mix is required to meet funding requirements;
- d) Is exclusively for self-build or custom-build; or
- e) Is exclusively for affordable housing or is an exception site .

4.16 Policy H5 goes on to note that “ *Whilst it is important to ensure the delivery of affordable housing to meet local needs, there may be some exceptions to providing the full amount of affordable housing required (either on or off-site). The following exceptions may be acceptable, at the Council’s discretion on a case-by-case basis:*

1. *There is a high level of existing affordable housing and there is a need to diversify the housing offer in a particular location (to be agreed with the Council); and*
2. *Developments which involve the conversion or demolition of a vacant building, through the application of Vacant Building Credit (VBC), to support viability. In determining whether VBC applies, the Council will assess the evidence submitted by the applicant and its compliance with the criteria set out in PPG” .*

- 4.17 Policy IN2: Developer Contributions details that in some cases, a site specific viability assessment may be submitted where the need for such is evidenced by a change in circumstance which could not have been evident in the whole plan Viability Assessment, in line with NPPF and PPG. Where the site specific viability assessment provides evidence to demonstrate that it is not financially viable to provide the level of planning obligations proposed, reduced planning obligations will only be permitted where:
1. *the value of the planning obligations has been maximised having regard to likely viability;*
 2. *a clawback mechanism has been incorporated into the legal agreement where appropriate, to ensure that additional mitigation is provided if final development viability is better than anticipated in the initial viability assessment; and*
 3. *the benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations.*
- 4.18 The Publication Local Plan includes a suite of policies within the Economy and Employment chapter which seek to deliver the borough's economic growth objectives and align with the spatial strategy established through Places for Everyone. These policies focus on directing employment development towards designated Business and Employment Areas, supporting the reuse of existing assets such as mill buildings, and ensuring that sufficient land is available to meet future needs.
- 4.19 Policy E1 establishes the borough's employment floorspace requirements for the plan period, including provision for office, industrial and warehousing uses.
- 4.20 Policy E2 directs employment development towards existing Business and Employment Areas, providing a clear spatial focus for economic activity and supporting the efficient use of land. This includes at designated BEA site Valley Hills (BEA21).
- 4.21 Policy E3 details that uses other than those set out in Policy E2 will not be permitted within BEAs unless the applicant can clearly demonstrate that it is no longer appropriate to continue the existing use. This can be done by the applicant providing information to the Council to demonstrate one of the four criteria below:
- *The site and premises have been subject to a detailed marketing appraisal, for a period of not less than 12 months, that clearly demonstrates that there is no current or likely future demand for them to continue for any of the above employment or commercial uses; or*

- *The site is specifically identified as being appropriate for other uses in a masterplan or framework and its retention as an employment site would conflict with the masterplan or framework; or*
- *The site is required for a facility or infrastructure meeting a regional or national need and there is no more suitable alternative site within the borough of Oldham; or*
- *The site and premises are no longer suitable for the existing use when taking into account the modern needs of businesses for highways access, site location, infrastructure, physical constraints, environmental considerations or neighbour amenity issues.*

4.22 In addition to meeting one of the above criteria, an applicant will need to demonstrate that a proposal has a clear need for the land use and that the redevelopment would not compromise the primary function of neighbouring uses.

5. Policy and Evidence Review

- 5.1 The following Chapter sets out the Site owners key views and comments on the Publication Plan. The Site owners have not commented on every policy set out in the document, only those considered particularly relevant to their interests at Bee Mill. The absence of comment to any further policies should not be construed as the Site owners agreeing with the approach taken.

Section 9: Economy and Employment

Employment Provision

- 5.2 The Publication Local Plan sets out the Council's ambition to help create the conditions in which businesses can invest, expand and adapt, in line with the NPPF. The document notes that by attracting new investment, supporting local businesses and leading in green technologies, the Council will generate quality job opportunities and equip people with the skills they need to succeed.
- 5.3 Publication Plan **Policy E1** details that in order to achieve the overall employment floorspace requirements for Oldham, at least 57,481m² of office (E(g)(i)) floorspace and at least 240,656m² of industrial and warehousing (B2 and B8) floorspace will be provided before 2039.
- 5.4 These figures differ notably from those set out in the Draft Employment Land Review (January 2024), which identifies a total requirement of 213,291 sqm of employment floorspace, comprising 49,133 sqm of office space and 164,158 sqm of industrial and warehousing floorspace within Oldham.
- 5.5 The Publication Plan explains that its figures are derived from a methodology previously advanced by the Places for Everyone authorities during the Main Modifications stage of the PfE examination however, the Inspectors concluded that such modifications were not necessary to ensure the soundness of the joint plan, as national policy does not require the apportionment of employment land requirements at the district level. As a result, the approach taken in the Publication Plan is not aligned with PfE and does not appear to be based on a consistently applied or clearly justified evidence base. The discrepancy between the PfE figures and those in the Regulation 19 Plan further undermines the robustness of the identified requirements.

- 5.6 Furthermore, even if the Plan were to rely on the PfE figures, these represent a supply position as at April 2022 and include a combination of saved Unitary Development Plan allocations, sites with extant planning permission, and allocations identified within PfE. As such, they do not provide an up to date or policy led assessment of future employment land needs, and their continued reliance raises concerns regarding the Plan's evidential accuracy and consistency.
- 5.7 The figures included within the Publication Plan have been inflated and do not reflect those within the Draft Employment Land Review used to inform the Draft Local Plan. It is therefore considered that the Council are claiming an over-supply of need for employment land provisions in the borough.
- 5.8 **Policy E2** of the Plan identifies the 23 Business and Employment Areas to be designated across Oldham, including land at Shaw Road(BEA8). The Policy sets out that uses within these sites will be restricted to employment uses. **Policy E3** further notes that other uses than those set out within Policy E2 will not be permitted unless the applicant can clearly demonstrate that it is no longer appropriate to continue its existing use.
- 5.9 The Site owners believe that this site should be removed from its current employment use allocation due to the site's age, and suitability to delivery housing development. This position is reinforced below with reference to the criteria set out in draft Policy E3, through which it can be clearly shown that the site is no longer appropriate for continued employment use:

1. The site and premises have been subject to a detailed marketing appraisal, for a period of not less than 12 months, that clearly demonstrates that there is no current or likely future demand for them to continue for any of the above employment or commercial uses; or

2. The site is specifically identified as being appropriate for other uses in a masterplan or framework and its retention as an employment site would conflict with the masterplan or framework; or

3. The site is required for a facility or infrastructure meeting a regional or national need and there is no more suitable alternative site within the borough of Oldham; or

4. The site and premises are no longer suitable for the existing use when taking into account the modern needs of businesses for highways access, site location, infrastructure, physical constraints, environmental considerations or neighbour amenity issues.

- 5.10 Whilst the Site continues to operate for employment purposes, it is increasingly constrained by its age, configuration and relationship with surrounding residential uses. Over time, these constraints may affect its long term suitability for modern employment operations.
- 5.11 Accordingly, the Local Plan should recognise that, whilst the Site remains in active use, it may not represent a sustainable long term employment location and may be better suited to alternative uses, including residential redevelopment, should circumstances change. Furthermore, the continued inefficient use of the Site for employment purposes could give rise to adverse impacts on neighbouring residential properties, including noise and light disturbance associated with HGV movements.

Section 8: Homes

Housing Delivery

- 5.12 The Publication Plan sets out the requirement for the borough to deliver at least 11,560 new homes over the Plan period;

	Annual Average	2022- 2025	2025-2030	2030-2039	Total
Number of Homes Required	680	404	680	772	11,560

Table H1: Phasing of Housing Requirements

- 5.13 **Policy H1** of the Publication Plan sets out that “*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 policy and guidance, PfE and other Local Plan policies*”.
- 5.14 The Publication Plan sets out that housing development on previously developed land, within sustainable and accessible locations will be supported. All residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL) 4 or above. In accordance with the latest February 2026 GMAL data set, the Bee Mill site achieves a GMAL score of 5.
- 5.15 As set out, the Publication Plan has been prepared in alignment with the 2021 publication of the NPPF. Oldham’s housing requirements are therefore stepped over three periods, and will increase significantly from 2026 onwards.
- 5.16 The emerging Local Plan has been prepared under transitional arrangements which allow it to rely on the previous version of the NPPF however, the updated version of the NPPF

(December 2024) introduced a revised standard method for calculating local housing need. While the transitional arrangements allow plans that are sufficiently advanced to proceed under the previous policy framework, the revised standard method represents the Government's most up to date assessment approach for determining housing need.

- 5.17 The figures detailed within Policy H1 are adapted from PfE Policy JP-H1 Table 7.2 and as such are dated and have been calculated using an out of date method.
- 5.18 Given this evolving policy context, it would be essential for the Council to commit to an early review of the Local Plan following adoption. Such a review would allow the Council to consider whether the housing requirement and spatial strategy remain consistent with national policy and with any updated assessment of housing need derived from the revised standard method. An early review of the Local Plan will be essential if Oldham's housing requirement falls short of the local housing need calculated by the updated standard method. Pursuant to Appendix I Paragraph 237 of the December 2024 NPPF, a deficiency necessitates a post-adoption review to address shortfall, align with current housing targets, and mitigate the risk of a mandatory 20% land supply buffer.
- 5.19 The supporting Housing Topic Paper highlights that housing completions in Oldham have historically been variable. Delivery increased from 2016/17, peaking in 2019/20 when several large sites were completed, before falling in 2020/21 and recovering gradually thereafter. Whilst completions have exceeded requirements in the early years of the plan period (approximately 115%), this must be considered in the context of a stepped housing requirement, with higher delivery rates required in later years.
- 5.20 The Council's December 2025 Strategic Housing Land Availability Assessment (SHLAA) identifies that housing supply in the early years of the plan period will largely come from sites under construction and those with extant permission, with a more limited contribution from strategic allocations. In the middle years of the plan period (2030-2035), supply is expected to be drawn from a broader mix of sources, including extant permissions, pending sites, PfE allocations and some previously stalled sites. By the later years of the plan period (2035-2039 and beyond), the SHLAA indicates that supply will rely increasingly on strategic allocations and other uncertain sources, including potential and stalled sites.
- 5.21 Sites such as Bee Mill represent a logical and sustainable opportunity for future housing delivery, particularly in the short to medium term, given the availability of existing infrastructure and services. This is especially relevant if the Plan is updated in line with the revised standard method. In light of the above, the Local Plan should recognise Bee Mill as a

suitable and viable location for residential development to help meet housing needs. Accordingly, the site should be released from its current employment designation.

Housing Densities

- 5.22 Publication **Policy H2** details the proposed minimum densities for residential developments within Oldham have been prepared in accordance with PfE Policy JP-H4. The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported.
- 5.23 The density assumptions applied through PfE formed part of the evidence base underpinning the strategic housing land supply across Greater Manchester and were tested through the examination process. Ensuring that development broadly aligns with those assumptions therefore provides an appropriate starting point for development proposals within the borough.
- 5.24 Whilst the PfE density assumptions provide an important strategic benchmark, the Local Plan should retain sufficient flexibility to allow density to increase where appropriate. Increasing residential density in suitable locations can support the efficient use of land, enhance the viability of development and assist in delivering the borough's housing requirement. National planning policy also encourages the efficient use of land and supports development that makes optimal use of sites, particularly where this can be achieved without compromising design quality or the character of the surrounding area.
- 5.25 Accordingly, the Local Plan should ensure that density policies do not operate as a constraint where higher densities would be appropriate in design, transport or sustainability terms.

Housing Mix

5.26 Oldham's Publication Local Plan details within **Policy H3** that new residential development should contribute to a diverse housing mix across the borough, ensuring that Oldham's housing needs can be met. The overall recommended dwelling type/size and mix are set out within Table H3 of the Publication Plan and have been extracted below;

Dwelling type/size	Market	Affordable/ Social rented	Affordable home ownership	Total
Overall % split	80%	12%	8%	100%
Dwelling type				
House	70-75%	35-40%	65-70%	60-65%
Flat	2-5%	30-35%	15-20%	10-15%
Bungalow/level-access	25-30%	30-35%	15-20%	25-30%
Size (bedrooms)				
1 to 2	30-35%	70-75%	35-40%	40-45%
3	40-45%	20-25%	40-45%	35-40%
4+	25-30%	5-10%	20-25%	20-25%

5.27 The Policy continues to note that;

For some developments an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:

- 1. It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;*
- 2. It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;*
- 3. The development is for specialist accommodation, such as for older and/ or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or*
- 4. There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.*

- 5.28 The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains deliverable and that housing mix should not be restricted to the mix set out in Table H3.
- 5.29 It is important that the application of housing mix requirements does not adversely impact the viability and deliverability of development. Where it can be demonstrated through the planning application process that strict adherence to the housing mix set out in Policy H3 would adversely impact development viability, the policy should allow sufficient flexibility for an alternative mix to be delivered. This will ensure that housing delivery can proceed in a timely manner while still contributing to meeting identified housing needs across the borough.

Affordable Housing

- 5.30 Publication **Policy H5** states that the Local Plan will ensure that a diverse type and tenure of affordable housing will need to be delivered to accommodate all households in need. All developments that provide 10 or more net additional homes, will be required to deliver an appropriate portion of the total site capacity as affordable housing in line with the value area in which the site is located and the land type , as set out in Table H4;

Value Area	Brownfield Land	Greenfield Land
High Value	20% of site capacity	25% of site capacity
Medium and Low Value	10% of site capacity	10% of site capacity

- 5.31 In accordance with the Value Area's map found within the Publication Plan, Bee Mill is located within a Medium/ Low Value Area for affordable housing, meaning that 10% of site capacity upon brownfield land should be delivered as affordable housing.
- 5.32 The Publication Plan notes that developments should provide affordable housing onsite however, by exception, it may be more appropriate, in meeting local needs for the payment of a commuted sum/ developer contribution to off site provision, or a mixture of onsite/off site provision. Off site contributions should provide the number of units that would have been delivered on site.

- 5.33 The principle of delivering affordable housing through new residential development is supported. Ensuring that development contributes towards meeting the borough's affordable housing needs is an important component of delivering balanced and sustainable communities.
- 5.34 It is noted that the quantity of homes required to trigger affordable housing requirements at sites has decreased from 15 dwellings (Adopted Oldham Joint Core Strategy and Development Management Policies DPD Policy 10) to 10 dwellings. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites.
- 5.35 Sites such as Bee Mill represent a logical location for the delivery of affordable housing, which the Site owners are committed to providing within any future residential planning application at the site.

Section 11: Oldham Town Centre & Section 14: Addressing the Biodiversity Emergency

Green Infrastructure Network

- 5.36 As set out in Publication **Policy OTC4**, the Council will support proposals which will create, protect and enhance multi-functional Green Infrastructure within and around Oldham Town Centre, including “ *the incorporation of biodiversity enhancements such as green walls and roofs, trees, and landscaping - encouraging wildlife, and creating interest and shade*”. The aim of this is to create a link of green spaces that will create active travel routes, and strategic landscapes, reaching from the town centre and beyond.
- 5.37 Publication **Policy N3** further notes that new development is expected to make an appropriate contribution to addressing local needs and opportunities for Green Infrastructure provision by retaining, enhancing and creating green spaces and corridors. Development for 20+ homes or non-residential development of 1,000m²+ will be required, where appropriate to:

- i. Enhance the landscape setting of the site by improving the character, appearance and condition of access corridors into the site, gateways, settlement edges and landscape features, including historic environment assets;
- ii. Enhance pedestrian and cycle connectivity between residential areas, town centres, schools and workplaces, outdoor sports, tourism and recreational facilities, public transport services and the countryside around the site; and
- iii. Facilitate for the production of food (e.g. allotments and community gardens) within residential or mixed-use developments.

5.38 The Site owners fully support the Council's proposals to increase green links and provide enhanced biodiversity provisions within new developments. As part of any future application for development, an ecological assessment will be undertaken to determine how the Green Corridor adjacent to the site will be protected and/or enhanced.

Section 15: Oldham's Historic Environment

Historic Buildings

- 5.39 **Policies HE1, HE2 and HE3** set out that where proposals positively conserve and enhance the historic environment and their setting will be supported by the Council. Development should actively manage proposals affecting historic fabric, and ensure that elements which contribute to an area's special character are preserved. Development will be supported where it is designed sympathetically having regard to the significance of the asset, its character, features and setting.
- 5.40 There are no designated heritage assets within the Bee Mill site. The nearest heritage assets lie beyond the northern boundary. The Bee Mill site was identified within Oldham's Mill Survey Report as holding a 'low' heritage value due to the amount of fabric alterations undertaken at the site.
- 5.41 The continued allocation of the site for employment use is not aligned with national policy, which seeks to make effective use of land and support development that responds positively to its context. Retaining the site in its current form would represent a missed opportunity to enhance the character and quality of the area.
- 5.42 By contrast, the removal of the existing employment use and redevelopment for residential purposes presents an opportunity to deliver a high quality scheme that strengthens the residential character of the area. In particular, a well designed housing scheme could better reflect the character and context of these heritage assets, contributing positively to the wider townscape and improving the overall quality of the area.

Section 16: Achieving High Quality Design

Design

- 5.43 High quality design standards will be expected from all development in accordance with Publication **Policy D1**. The policy makes specific reference to the fact that development proposals, should through their design “ deliver buildings and spaces that are appropriate, in terms of their form, massing and height, for the site and surrounding context, and positively respond to local distinctiveness and character”.
- 5.44 There is a clear opportunity to deliver a considered residential scheme that reflects the vernacular of the surrounding area, incorporating high quality materials, active frontages, and legible layouts at the site.
- 5.45 A comprehensive and design led approach, provided through the re-designation of the site, will ensure that development not only complies with Policy D1 but also delivers a scheme that enhances local character, responds sensitively to its context, and contributes to the long term quality and sustainability of the area.

Section 20: Infrastructure and Delivery in Oldham

Planning Obligations

- 5.46 The requirement for planning obligations is set out within **Policy IN2** of the Plan. The policy confirms that where development would generate additional demand for infrastructure, services and facilities beyond existing capacity, appropriate provision and/or financial contributions will be required to mitigate those impacts. This may include the provision of infrastructure onsite or, where more appropriate, contributions towards new or enhanced provision off-site.
- 5.47 It is also important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability. Policy IN2 confirms that, where justified, a site specific viability assessment may be submitted where there has been a material change in circumstances that was not evident at the time of the whole plan viability assessment, in accordance with national policy set out in the National Planning Policy Framework and Planning Practice Guidance.
- 5.48 Where such assessments demonstrate that it is not financially viable to deliver the full extent of planning obligations, the policy allows for reduced obligations to be considered, subject

to appropriate safeguards. These include ensuring that the value of planning obligations has been maximised having regard to viability, the inclusion of clawback mechanisms where appropriate to capture any future uplift in viability, and the need to balance the benefits of development against any shortfall in mitigation.

6. Tests of Soundness

6.1 Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound.

6.2 The tests of soundness are set out in the NPPF, December 2021 (para 35), which states:

“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

6.3 The Site owners have prepared the below comments regarding the soundness of the Publication Local Plan under the four headings used in the NPPF.

Positively Prepared

6.4 For a plan to be “positively prepared”, it must be based on a strategy which, as a minimum, seeks to meet objectively assessed development and infrastructure requirements, and is informed by agreements with other authorities.

6.5 While the Plan seeks to meet the housing and employment needs identified through Places for Everyone, it fails to fully respond to the most up to date evidence and national policy context.

- 6.6 In particular, the reliance on an outdated housing requirement, derived from the 2021 NPPF, means that the Plan does not fully account for the Government's most recent standard method for calculating housing need (December 2024 NPPF). This raises concerns that the Plan may not meet objectively assessed needs over the plan period.
- 6.7 Furthermore, the failure to recognise sustainable, deliverable brownfield opportunities such as Bee Mill undermines the Plan's ability to maximise housing delivery in accordance with national policy. The Plan should be more flexible and responsive in bringing forward such sites, particularly where they are well located and unconstrained. As such, the Plan is not positively prepared in respect of Bee Mill.

Justified

- 6.8 The NPPF states that for a plan to be "justified", it must be an appropriate strategy when considered against the reasonable alternatives, and must be based on proportionate evidence.
- 6.9 The designation of Bee Mill as part of BEA8 is not justified when considered against reasonable alternatives. The site is no longer suitable for employment use, particularly when assessed against Policy E3 criteria. The Council has not adequately demonstrated why the retention of Bee Mill for employment use is the most appropriate strategy when compared to the clear and deliverable alternative of residential redevelopment.
- 6.10 In addition, the employment land requirement figures within the Plan are inconsistent with the Council's own evidence base and appear inflated.

Effective

- 6.11 The NPPF states that for a plan to be "effective", it must be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 6.12 The continued allocation of Bee Mill for employment use is not deliverable in practice. The site is constrained, underperforming, and not capable of meeting modern employment requirements. There is no realistic prospect of the site contributing meaningfully to the borough's employment land supply.
- 6.13 The site however, is immediately available and suitable for residential redevelopment, with a clear prospect of delivery in the short to medium term. The failure to recognise this opportunity reduces the effectiveness of the Plan in delivering housing.

Consistent with National Policy

- 6.14 The NPPF states that for a plan to be consistent with National Policy, it must enable the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 6.15 The continued allocation of Bee Mill for employment use conflicts with principles of the NPPF in that, the Plan does not promote the effective use of land and the provision of sustainable housing within this location.
- 6.16 The National Planning Policy Framework has been updated on several occasions since 2021, with the latest version published in December 2024. These updates introduce a number of refinements, including a revised standard method for assessing housing need however, the overarching policy approach to housing delivery, sustainable development and plan making remains broadly consistent with the 2021 Framework. Accordingly, while the Publication Plan has been prepared with reference to the 2021 NPPF, the conclusions regarding its consistency with national policy remain materially unchanged when assessed against the 2024 version.

7. Proposed Modifications

- 7.1 In order to ensure that the Publication Local Plan, this Chapter has been prepared to set out the proposed modifications put forward by the Site owners to address the Regulation 19 draft of Oldham's Local Plan. Proposed policy wording amendments have been detailed in ***bold italics*** in the text below.

Policy E2- Business and Employment Areas

- 7.2 The Site owners suggest the below amended wording to Policy E2:

It is important that Oldham has a range of sustainable employment areas to support the local economy. There will be a strong emphasis on protecting and enhancing our existing employment areas. Designated employment areas are spread across the borough. These Business and Employment Areas (BEAs) provide land for existing firms to expand and for new firms to locate to, so providing for job opportunities.

*There are ~~23~~ **22** BEAs designated across the borough. These are identified on the Policies Map and set out in Table E1 below.*

[Removal of BEA 8 Shaw Road from Table E1]...

Policy H1- Delivering a Diverse and Sustainable Housing Offer

- 7.3 The Site owners support the addition of the following text to Policy H1:

The Council will promote a diverse housing offer to meet the differing needs of all Oldham's residents. Oldham's minimum local housing need (the number of new homes needed) is set out in Policy JP-H1 of PpE. PpE sets out that Oldham is required to deliver at least 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year. The housing requirement is phased through a stepped housing requirement as set out in Table H1.

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, PpE 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)26 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 Council will support the redevelopment of previously developed land in sustainable and accessible locations for housing, particularly where such sites are no longer suitable or viable for their existing use.

8. Participation at Hearing Sessions

- 8.1 The Site owners confirm that it would wish to take part in any relevant Hearing Session(s) as part of the Local Plan Examination in Public.

9. Conclusion

- 9.1 The Site owners object to the continued designation of Bee Mill as part of Business and Employment Area BEA8 within the Publication Local Plan. The Site owners do not object to the continued operation of Bee Mill for employment purposes in the short term however, the current designation does not provide sufficient flexibility to respond to future changes in circumstances.
- 9.2 Bee Mill represents a sustainable, deliverable and logical opportunity for residential development. The site is previously developed, well located in accessibility terms, and embedded within an established residential area. Its redevelopment could contribute positively towards meeting housing needs, improving the character of the area, and enhancing the setting of nearby heritage assets.
- 9.3 A more flexible policy approach would ensure that the Site can continue to support employment uses where appropriate, whilst also allowing for a transition to residential development should the Site become available during the plan period.
- 9.4 In the context of an evolving national policy framework, and the likelihood of increased housing requirements, it is essential that the Council adopts a flexible and proactive approach to identifying deliverable housing sites.

AHRRB67 site plan



Keyboard shortcuts Map data ©2026 Imagery ©2026 Airbus, Maxar Technologies, Vexcel Imaging US, Inc. Terms Report a map error

From: Cait O'Dowd - AshtonHale [REDACTED]
Sent: 27 March 2026 10:19
To: SPI Consultations
Cc: Richard Barton - AshtonHale
Subject: Oldham Local Plan: Publication Plan- Representations on behalf of Grasscroft de Greenfield Ltd
Attachments: Representation on Behalf of GdeG Moss Farm 270326.pdf;
0920284665f88adc4279fbfd65e87a63299362022ce1532100b6e8202f97.pdf

Dear Sir/ Madam,

I am writing to formally submit representations on behalf of Grasscroft de Greenfield Ltd in response to the Oldham Council Local Plan Regulation 19 Consultation.

Please find attached a letter which sets out Grasscroft de Greenfield Ltd's comments relating to this consultation. Grasscroft de Greenfield Ltd request that the contents of this letter be taken into account as part of the review process.

I would be grateful if you could confirm receipt of this submission, and request that we are kept updated with the future progress of the Local Plan.

Many thanks,

Cait

Cait O'Dowd
Planner
AshtonHale

[REDACTED]
A: ABC Buildings, 21-23 Quay Street, Manchester, M3 4AE
O: [Website](#) / [LinkedIn](#)



ashtonhale.co.uk

for any loss or damage sustained as a result of computer viruses and the recipient must ensure that the email (and attachments) are virus free.

This message, including any document or file attached, is intended only for the addressee and may contain privileged and/or confidential information. Any other person is strictly prohibited from reading, using, disclosing or copying this message. If you have received this message in error, please notify the sender and delete the message.

Please also be aware that the presence of a signature or footer on this email does not constitute agreement or a signature of any contract for the purposes of sale, administration or transfer of land. Any such agreements must be made through appointed legal representatives. Thank you.



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		
First Name		Richard
Last Name		Barton
Job Title (where relevant)		
Organisation (where relevant)	Grasscroft de Greenfield Ltd	AshtonHale Ltd
Address Line 1		ABC Building
Line 2		Quay Street
Line 3		Spinningfields
Line 4		Manchester
Post Code		M3 4AE
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? Please refer to the enclosed representation statement.

Paragraph Policy Policies Map

4. Do you consider the Local Plan is: Please refer to the enclosed representation statement.

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

Please tick as appropriate

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

Please refer to the enclosed representation statement.

(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 refer to the enclosed representation statement.

(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:

Please refer to the enclosed representation statement.

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

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

☒
☒
☒

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

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

The Adoption of the Oldham Local Plan.

27th March 2026

Strategic Planning and Information

Oldham Council
First Floor Reception
Spindles Shopping Centre
Oldham
OL1 1LA

Sent via email only to: spi.consultations@oldham.gov.uk

Dear Sir / Madam

The Oldham Local Plan - Publication Consultation: Representations on behalf of Grasscroft de Greenfield Ltd

These representations have been prepared by AshtonHale on behalf of Grasscroft de Greenfield Ltd (GdeG). The representations relate to Land at Moss Farm, Longley Street and specific policies proposed in the Local Plan of relevance to it.

Background

Land at Moss Farm is located within the Beal Valley PfE allocation (JPA 10) and earmarked to deliver residential development. The site location is attached at Appendix 1. It has the benefit of being located towards the most northern part of the allocation, accessible from Longley Street without dependence on the delivery of any wider infrastructure. As such it is capable of coming forward in the short term to help the Council with its delivery of housing identified in its 5 year supply.

The land is also covered by the Beal Valley and Broadbent Moss Masterplan and Design Code, which was prepared to demonstrate delivery of the relevant policy requirements of JPA 10 (and the adjacent JPA 12 allocation).

The Beal Valley allocation (JPA 10) lies to the east of Royton and north of Higginshaw. The Site lies in proximity to residential neighbourhoods, to the west and north-west, while employment areas (including the Higginshaw Business Park) are located to the south. The Site lies within a strategic location, close to the Oldham-Rochdale Metrolink line, which provides an important connection between Oldham, Rochdale and central Manchester.

Within the PfE Plan, the Beal Valley allocation it is recognised as a site that will enable Oldham to diversify its housing stock and has the potential to meet " local housing need in the immediate vicinity and across the borough and contribute to, and enhance, the housing mix within the area through adding to the type and range of housing available".

The representations relate to specific policies contained within the Regulation 19 Draft Local Plan, set out below.

Planning For Growth

The Oldham Local Plan has been aligned with the Places for Everyone (PfE) plan period, running to 2039, as it is intended to support delivery of the Joint Plan. The emerging Local Plan for Oldham focuses on non-strategic planning policies, primarily relating to development management. It will not identify new sites for future housing or employment development. Instead, the Plan provides a positive planning framework that underpins and facilitates the delivery of housing and employment land supply through its policies.

During preparation of the Plan, the National Planning Policy Framework ("NPPF") was updated in December 2024. The December 2024 NPPF introduced transitional arrangements allowing local planning authorities to rely on policies that deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020.

The Oldham Local Plan includes policies intended to deliver the housing requirement and development growth set out in the Places for Everyone joint development plan. As such, the Publication Plan has been prepared in accordance with the relevant previous version of the Framework, as set out in paragraph 235 of the NPPF. In this instance, this is the 2021 NPPF, under which PfE was examined.

The purpose of this Chapter is to highlight the requirements of the NPPF, as it was, on which the Publication Oldham Local Plan needs to be considered, as well as highlighting some of the relevant strategic policies with the Regulation 19 draft pertinent to GdeG's landholdings and representations. GdeG's commentary on whether the Publication Plan is sound in relation to these points is then contained in future Chapters.

National Planning Policy Framework

The NPPF (July 2021) states at Paragraph 15 that the planning system should be genuinely plan led, and that succinct and up to date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

NPPF Paragraph 16 states that plans should:

- a. be prepared with the objective of contributing to the achievement of sustainable development;*
- b. be prepared positively, in a way that is aspirational but deliverable;*
- c. be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e. be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f. serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

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

Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

Regulation 19 Oldham Local Plan- Key Strategic Policies

Vision for Building a Better Oldham: Our Local Plan Vision (page 23) states that “ *Through delivering at least 11,560 new homes of different sizes and types, including affordable housing, Oldham will have quality homes for everyone that meet the needs of Oldham’s residents. New homes, delivered in sustainable and accessible locations, will contribute to inclusive and vibrant communities where everyone can live*”.

Plan Objective 1 sets out the Council will build quality homes to meet local needs and diversify housing offer by:

- providing for, and supporting the delivery of, at least 11,560 new homes;
- delivering a diverse housing offer to meet the needs of all residents including affordable housing and homes for families, older people and disabled people;
- ensuring the delivery of high-quality, sustainable and well-designed new homes; and
- ensuring appropriate densities and making the best and most effective use of brownfield land.

Policy H1 states that “ *The Council will promote a diverse housing offer to meet the differing needs of all Oldham’s residents. Oldham’s minimum local housing need (the number of new homes needed) is set out in Policy JP-H1 of PfE. PfE sets out that Oldham is required to deliver at least 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year*” and 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, PfE and other Local Plan policies*”.

Policy H2 notes that to achieve appropriate densities, new residential developments should achieve densities as set out in PfE Policy JP-H4.

Policy H3 details that “ *new residential developments should contribute to a diverse housing mix across the borough, ensuring that Oldham’s housing needs can be met. Oldham’s Local Housing Needs Assessment (LHNA) provides evidence in relation to housing mix, including tenure, bed size and house type*” and that “ *For some developments an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:*

- I. *It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;*

- II. *It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;*
- III. *The development is for specialist accommodation, such as for older and/ or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or*
- IV. *There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.*

In terms of affordable housing, Policy H5 states that all developments providing 10 or more dwellings will be required to deliver an appropriate proportion of affordable housing in line with the value area in which the site is located. In line with the evidence set out in the Local Housing Needs Assessment, the tenure split for new affordable housing should be provided as follows:

- 25% affordable rented;
- 35% affordable home ownership; and
- 40% social rented.

Exemptions to this tenure mix apply where the proposed development:

- a) Provides solely for Build to Rent homes;
- b) Provides specialist housing to meet local housing needs;
- c) A specific tenure mix is required to meet funding requirements;
- d) Is exclusively for self-build or custom-build; or
- e) Is exclusively for affordable housing or is an exception site .

Policy H5 goes on to note that “ *Whilst it is important to ensure the delivery of affordable housing to meet local needs, there may be some exceptions to providing the full amount of affordable housing required (either on or off-site). The following exceptions may be acceptable, at the Council’s discretion on a case-by-case basis:*

1. *There is a high level of existing affordable housing and there is a need to diversify the housing offer in a particular location (to be agreed with the Council); and*
2. *Developments which involve the conversion or demolition of a vacant building, through the application of Vacant Building Credit (VBC), to support viability. In determining whether VBC applies, the Council will assess the evidence submitted by the applicant and its compliance with the criteria set out in PPG” .*

Policy IN2: Developer Contributions details that in some cases, a site specific viability assessment may be submitted where the need for such is evidenced by a change in circumstance which could not have been evident in the whole plan Viability Assessment, in line with NPPF and PPG. Where the site specific viability assessment provides evidence to demonstrate that it is not financially viable to provide the level of planning obligations proposed, reduced planning obligations will only be permitted where:

1. *the value of the planning obligations has been maximised having regard to likely viability;*

2. a clawback mechanism has been incorporated into the legal agreement where appropriate, to ensure that additional mitigation is provided if final development viability is better than anticipated in the initial viability assessment; and
3. the benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations.

The following Chapter sets out GdeG's key views and comments on the Publication Plan. GdeG has not commented on every policy set out in the document, only those considered particularly relevant to their interests. The absence of comment to any further policies should not be construed as GdeG agreeing with the approach taken.

Section 8: Homes

Housing Delivery

The Publication Plan sets out the requirement for the borough to deliver at least 11,560 new homes over the Plan period;

	Annual Average	2022- 2025	2025- 2030	2030- 2039	Total
Number of Homes Required	680	404	680	772	11,560

Table H1: Phasing of Housing Requirements

Policy H1 of the Publication Plan sets out that *"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 policy and guidance, PfE and other Local Plan policies"*.

GdeG welcomes this, as it confirms that development of sites which are allocated under PfE policy will be acceptable.

As set out previously within this Representation, the Publication Plan has been prepared in alignment with the 2021 publication of the NPPF. The proposed housing delivery figures align with the PfE plan, a document which has been subject to extensive evidence based scrutiny and independent examination prior to its adoption. Throughout this process, the distribution of housing growth across Oldham, and Greater Manchester, were tested in detail. The adopted Plan therefore provides a detailed evidence based strategy for meeting housing needs and sustainable growth across Oldham.

As such, it is important that the emerging Local Plan supports the delivery of the established housing requirements and spatial strategy established through PfE, and ensures that policies facilitate the delivery of the strategic allocations identified within the adopted Development Plan.

GdeG welcomes that the figure (11,560 new dwellings) is recognised as a minimum requirement over the Plan period. This principle reflects the NPPF's objective (both 2021 and 2024 version) of boosting the supply of houses and ensuring that planning policies support the delivery of sufficient housing to meet identified needs.

The Beal Valley allocation represents significant and deliverable sources of housing supply within the borough over the plan period through joint public and private sector investment. As detailed within the Council's Housing Topic Paper, a substantial proportion of anticipated housing delivery is reliant on PfE allocations.

The emerging Local Plan has been prepared under transitional arrangements which allow it to rely on the previous version of the NPPF however, the updated version of the NPPF (December 2024) introduced a revised standard method for calculating local housing need. While the transitional arrangements allow

plans that are sufficiently advanced to proceed under the previous policy framework, the revised standard method represents the Government's most up-to-date assessment approach for determining housing need.

In this context, future reviews of Oldham's housing requirement will need to take account of the updated standard method and the direction of travel within national planning policy towards higher levels of housing delivery.

The Council's December 2025 Strategic Housing Land Availability Assessment (SHLAA) confirms that both Beal Valley and Broadbent Moss allocations are progressing.

Regarding Beal Valley, Appendix 1 of the Housing Topic Paper sets out an expectation that the allocation will deliver 342 dwellings in the five years immediately following adoption of the Plan (2027/28-2031/32). A further 140 dwellings are anticipated to be completed between 2032/33 and 2039, covering the remainder of the Plan period.

GdeG supports the recognition that housing delivery on the allocated site can commence early in the Plan period.

GdeG welcomes the Local Plan's recognition that the delivery of PfE strategic allocations forms a key component of the borough's housing supply. Policy wording could however be more explicit that housing delivery will be focused on the implementation of these allocations and that proposals consistent with them will be supported in principle and be a priority in terms of infrastructure support.

Housing Densities

Publication **Policy H2** details the proposed minimum densities for residential developments within Oldham have been prepared in accordance with PfE Policy JP-H4. The principle of aligning residential densities with the assumptions underpinning the PfE spatial strategy is supported however, these densities should not restrict development coming forward in circumstances where site specific characteristics do not allow these figures to be achieved.

Exceptions are identified as:

- to meet a funding requirement or to deliver a particular housing need;
- to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and
- to provide for specialist housing accommodation (i.e. extra care housing, bungalows). The Council will assess this on a site-by-site basis and only allow exceptions where necessary.

The exceptions provided in H2 which allow for flexibility in terms of density are welcomed by GdeG. It is considered the policy could however be bolstered by referencing that alternative densities will be considered acceptable where identified in endorsed masterplans / Supplementary Planning Documents, or their subsequent equivalents (such as the example of the Masterplan and Design Code for Beal Valley and Broadbent Moss).

Housing Mix

Oldham's Publication Local Plan details within **Policy H3** that new residential development should contribute to a diverse housing mix across the borough, ensuring that Oldham's housing needs can be met. The overall recommended dwelling type/size and mix are set out within Table H3 of the Publication Plan and have been extracted below;

Dwelling type/size	Market	Affordable/ Social rented	Affordable home ownership	Total
Overall % split	80%	12%	8%	100%
Dwelling type				
House	70-75%	35-40%	65-70%	60-65%
Flat	2-5%	30-35%	15-20%	10-15%
Bungalow/level-access	25-30%	30-35%	15-20%	25-30%
Size (bedrooms)				
1 to 2	30-35%	70-75%	35-40%	40-45%
3	40-45%	20-25%	40-45%	35-40%
4+	25-30%	5-10%	20-25%	20-25%

The Policy notes that;

For some developments an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:

- 1. It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;*
- 2. It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;*
- 3. The development is for specialist accommodation, such as for older and/ or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or*
- 4. There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.*

The inclusion of flexibility within the policy is welcomed and supported. It is important that housing mix requirements are applied in a way that recognises the varying characteristics of individual sites and the need to ensure that development remains viable and deliverable and that housing mix should not be restricted to the mix set out in Table H3.

Affordable Housing

Publication **Policy H5** states that the Local Plan will ensure that a diverse type and tenure of affordable housing will need to be delivered to accommodate all households in need. All developments that provide 10 or more net additional homes, will be required to deliver an appropriate portion of the total site capacity as affordable housing in line with the value area in which the site is located and the land type, as set out in Table H4;

Value Area	Brownfield Land	Greenfield Land
High Value	20% of site capacity	25% of site capacity
Medium and Low Value	10% of site capacity	10% of site capacity

The map defining the value areas is very high level and it is challenging to determine precise boundaries at a sufficient level of detail. It would appear however that Beal Valley is located within value areas where 10% of the site capacity should be delivered as affordable housing and GdeG would support that level of provision.

The Publication Plan notes that developments should provide affordable housing onsite however, by exception, it may be more appropriate, in meeting local needs for the payment of a commuted sum/ developer contribution to off site provision, or a mixture of onsite/off site provision. Off site contributions should provide the number of units that would have been delivered on site.

The principle of delivering affordable housing through new residential development is supported. Ensuring that development contributes towards meeting the borough's affordable housing needs is an important component of delivering balanced and sustainable communities.

It is noted that the quantity of homes required to trigger affordable housing requirements at sites has decreased from 15 dwellings (Adopted Oldham Joint Core Strategy and Development Management Policies DPD Policy 10) to 10 dwellings. It is important that the policy is applied with flexibility to ensure that development remains viable and deliverable across all sites and in accordance with national policy and guidance.

Strategic allocations such as Beal Valley are expected to deliver a substantial number of homes over an extended period and could involve significant infrastructure investments. It is important that affordable housing requirements are therefore applied in a manner that takes account of site-specific viability considerations and the infrastructure requirements associated with large scale strategic developments.

GdeG therefore supports the policy and particularly welcomes the acknowledgement that affordable housing can be delivered by the use of planning conditions.

Section 12: Addressing Climate Change

Renewable Energy

In line with **Policy CC1**, proposals for renewable and low-carbon energy development will be supported provided they do not cause adverse effects on the surrounding environment or harm local amenity.

GdeG agree with this view and have exemplified within the endorsed Masterplan and Design Code the importance of a fabric first approach to maximise energy efficiency. Reducing embodied energy is achieved by using low energy materials, recycling, efficient use of materials, reducing waste, designing buildings that can be easily disassembled and designing buildings that are easily adaptable. All these

elements must be taken into account during the design and detailing of the layout and the proposed homes.

Section 16: Achieving High Quality Design

Design

High quality design standards will be expected from all development in accordance with Publication **Policy D1**. The policy makes specific reference to the fact that *"proposals for strategic development should be supported by a design-led masterplan or framework and, where appropriate, a site specific design code to show how it achieves the principles above"*.

This approach is supported by GdeG. Ensuring that development is guided by a comprehensive design led masterplan and design code is an important mechanism for securing high quality placemaking, coordinated infrastructure delivery and new communities.

In the case of the Beal Valley allocation identified within PfE, a detailed masterplan framework has already been prepared which establishes a spatial framework for the development of the sites, including development parcels, movement networks, green infrastructure corridors, landscaping, and design principles. It also sets out guidance on built form, density, street hierarchy and public realm, ensuring that development across the allocations is delivered in a coordinated and design-led manner.

The document provides the appropriate mechanism through which the design principles of Publication Policy D1 can be applied in a site specific manner.

Section 18: Communities

Planning Obligations

The requirement for planning obligations is set out within **Policy IN2** of the Plan. The policy confirms that where development would generate additional demand for infrastructure, services and facilities beyond existing capacity, appropriate provision and/or financial contributions will be required to mitigate those impacts. This may include the provision of infrastructure onsite or, where more appropriate, contributions towards new or enhanced provision off-site.

GdeG supports this policy and the Masterplan and Design Code sets out how this can be achieved.

It is also important that the policy recognises the need for flexibility in the application of planning obligations, particularly in relation to viability. Policy IN2 confirms that, where justified, a site specific viability assessment may be submitted where there has been a material change in circumstances that was not evident at the time of the whole plan viability assessment, in accordance with national policy set out in the National Planning Policy Framework and Planning Practice Guidance.

Where such assessments demonstrate that it is not financially viable to deliver the full extent of planning obligations, the policy allows for reduced obligations to be considered, subject to appropriate safeguards. These include ensuring that the value of planning obligations has been maximised having regard to viability. GdeG supports this. The inclusion however of clawback mechanisms will not always be appropriate and GdeG welcomes that this will only be sought 'where appropriate'.

Tests of Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound.

The tests of soundness are set out in the NPPF, December 2021 (para 35), which states:

“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

GdeG have prepared the below comments regarding the soundness of the Publication Local Plan under the four headings used in the NPPF.

Positively Prepared

For a plan to be “positively prepared”, it must be based on a strategy which, as a minimum, seeks to meet objectively assessed development and infrastructure requirements, and is informed by agreements with other authorities. GdeG is content the Publication Local Plan is positively prepared in that it seeks to deliver the housing and employment growth identified through the adopted Places for Everyone. The inclusion of policies supporting the delivery of at least 11,560 homes between 2022 and 2039 reflects the borough’s contribution to meeting Greater Manchester’s strategic housing requirements.

The Plan could be bolstered by explicitly identifying and supporting categorically the delivery of strategic allocations identified through PfE, including Beal Valley, recognising their important role in meeting housing and employment needs across the borough.

Justified

The NPPF states that for a plan to be “justified”, it must be an appropriate strategy when considered against the reasonable alternatives, and must be based on proportionate evidence.

The spatial strategy of the Publication Plan is justified as it aligns with the strategy established through PfE, which has been subject to extensive evidence base analysis and independent examination prior to its adoption. Strategic allocations such as Beal Valley were identified through a comprehensive site selection process and were tested through the PfE examination process. The allocation represents an appropriate, sustainable and justified location for accommodating growth within Oldham.

Effective

The NPPF states that for a plan to be “effective”, it must be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

The Publication Local Plan relies significantly on the already tested PfE. Its policies set out how PfE requirements can be achieved over the Plan period. While some development will likely extend beyond the Plan period, GdeG considers it to be effective.

Consistent with National Policy

The NPPF states that for a plan to be consistent with National Policy, it must enable the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The Publication Plan aligns with national policy objectives set out in the National Planning Policy Framework, including the need to significantly boost the supply of homes, support sustainable economic growth and promote high quality design. The Plan should ensure that its policies support the efficient use of land and allow appropriate flexibility in the application of density, housing mix and affordable housing requirements where this is necessary to maintain the viability and deliverability of development. Ensuring that the Plan supports the implementation of the PfE strategic allocations will also help ensure consistency with national policy objectives relating to sustainable development.

The NPPF has undergone several updates since 2021, with the most recent version published in December 2024. While some refinements have been introduced, the overarching policy direction concerning housing delivery, sustainable development and plan-making remains broadly consistent with the 2021 Framework. As such, although the Publication Plan has been prepared with reference to the 2021 NPPF, the conclusions reached regarding its consistency with national policy would remain unchanged when considered against the latest 2024 iteration.

GdeG is content the Local Plan is consistent with National Policy.

Participation at Hearing Sessions

GdeG confirms that it would wish to take part in any relevant Hearing Session(s) as part of the Local Plan Examination in Public.

Conclusion

GdeG supports the overall direction of the Publication Oldham Local Plan and its alignment with the spatial strategy established through the adopted Places for Everyone plan.

Strategic allocations such as Beal Valley will play a critical role in delivering sustainable growth within the borough by providing new homes, employment opportunities, supporting infrastructure and high-quality green infrastructure.

The Publication Plan provides a strong foundation for delivering this growth however, and GdeG considers that the Publication Local Plan will provide a sound policy framework for delivering sustainable development across Oldham and supporting the implementation of the PfE spatial strategy.

Yours Sincerely,



Richard Barton
Director



AshtonHale Ltd

HM Land Registry
Official copy of
title plan

Title number **GM47397**
Ordnance Survey map reference **SD9408NW**
Scale **1:2500 reduced from 1:1250**
Administrative area **Greater Manchester :**
Oldham



© Crown copyright and database rights 2019 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

