

Oldham

Local Plan

**Oldham Local Plan: Publication Plan -
Regulation 19(1) Representations - Part 05 -
Od to Pa**

August 2026



Oldham
Council

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From: Cait O'Dowd - AshtonHale [REDACTED]
Sent: 27 March 2026 10:42
To: SPI Consultations
Cc: Richard Barton - AshtonHale
Subject: Oldham Local Plan: Publication Plan- Representations on behalf of Grasscroft de Greenfield Ltd
Attachments: Representation on G de G Woodhouses 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 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]
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Oldham Local Plan
Publication Plan Stage Representation Form

Ref:

(For official
use only)

Comments are invited until 11.59pm on Friday 27 March 2026

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

Please return this form by:

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

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

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

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title

First Name

Grasscroft de Greenfield Ltd

Richard

Last Name

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

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

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. There are two elements to the representation; the first in relation to the suitability of Land off Ashton Road, Woodhouses to accommodate residential development and the second regarding specific policies proposed in the Local Plan.

Land off Ashton Road, Woodhouses

Whilst it is understood that the emerging Local Plan does not seek to allocate additional sites for development beyond those already identified in Places for Everyone (PfE), in the event that this position changes during the examination of the Plan, Or should officers determine the allocation of sites to be necessary at this stage, our client would wish to place on record the deliverability of Land off Ashton Road, Woodhouses, for development.

The location of the site is attached at Appendix 1. The Site was identified in the 2019 draft Greater Manchester Spatial Framework (subsequently Places for Everyone) document as one of three allocations within the Green Belt at Woodhouses, immediately adjacent to the settlement boundary. Policy GM Allocation 22 identified that collectively the sites could deliver around 260 homes, although it did not provide a breakdown of how those homes might be split between the sites.

It is understood the site was not taken forward as an allocation beyond this point on the basis it was argued housing need in Oldham could be met elsewhere, reducing the need for Green Belt release at that time. It is noted that Bottom Field Farm, on the other side of Ashton Road was allocated and is now being built out. This demonstrates the acceptability of the sustainability of the site in locational terms given the proximity of the land to Bottom Field Farm.

Significant work was undertaken when the land was previously promoted for development, and as such the following information is also appended to these representations:

- Colour Site Layout showing how c50 homes could be delivered
- Context Plan which shows the strong relationship between the site and existing development
- Extended Phase 1 Habitat Survey which demonstrates the site is of limited ecological value
- Plan showing potential site access arrangements

The site remains suitable, available and deliverable for development, and in the event that additional land is required to deliver Oldham's housing need, it is exceptionally well placed to deliver it being in a sustainable location immediately adjacent to the existing settlement boundary of Woodhouses.

It is noted that the increase in housing need in Oldham, derived via the new Standard Method, is considerable. It would be proactive of the Local Authority to follow a similar approach to that being pursued in adjacent Tameside, which proposes to allocate additional sites for development at this stage, rather than waiting for a review. Failing that, an early review of the Local Plan to account for the uplift should be undertaken promptly to identify the additional land which will be required.

Local Plan Policies

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 does not identify new sites for future housing or employment development. Instead, the Plan provides a 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”.*

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. GdeG highlights the location of another allocation within very close proximity of this site which serves to demonstrate the sustainability credentials of this location.

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 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.

It is considered that the Council could take a more proactive approach to meeting future housing development by identifying additional land at this juncture, rather than waiting for a future Local Plan. For example the adjacent borough of Tameside, which also benefits from PfE allocations, has chosen to identify additional dratt housing allocations at this stage.

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.

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 the site 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.

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. 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**.

This approach is supported by GdeG.

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.

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 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.

As highlighted above however GdeG considers the Council could have taken a more proactive approach by identifying additional housing sites at this stage rather than relying on an early review of the Local Plan, which risk the Council being unable to demonstrate a deliverable 5 year housing land supply.

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.

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.

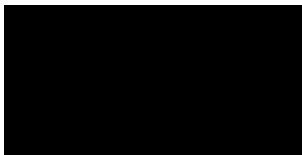
Conclusion

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.

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.

It is considered however that the Council could take a more positive approach to the Plan by including additional housing allocations at this stage, rather than waiting for an early review of the Local Plan. In the event that additional land is required, Land off Ashton Road, Woodhouses, is very well placed to contribute to this.

Yours Sincerely,



Richard Barton
Director



AshtonHale Ltd



House Type	Bed No.	Type	No.	Sqft	Total Sqft	Split
A2	2	Semi Detached	8	725	5800	16.00%
C	3	Semi Detached/Mews	12	958	11496	24.00%
E1	3	Detached	1	904	904	2.00%
F	3	Semi Detached	2	958	1916	4.00%
I	4	Detached	2	1087	2174	4.00%
P	4	Detached	3	1400	4200	6.00%
AA	4	Detached	4	1155	4620	8.00%
S	4	Detached	5	141	705	10.00%
Affordables						
A2	2	Semi Detached	1		1975	22.00%
C	2	Semi Detached	1	95		2.00%
F	3	Semi Detached	1		155	2.00%
		Total	50		900*	100.00%

Revision:

A Detached mix applied

B Additional land added, mix amended, affordable provision added

C Parking increased to 200%, runs of more than four spaces eliminated, additional POS added

Project Title:

Residential Development

Address:

Ashton Road,
Woodhouses,
Failsworth.

Drawing:

Proposed Sketch Site Layout

Drawing No:

DJ/ARW/SL/01

Drawn:

GB

Ch'd:

JL

Date:

Date 16/11/16

Scale:

1:500

Paper Size:

A1

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Land off Ashton Road, Woodhouses

Proposed
residential
development

Baldwin **Design**

Consultancy Ltd

- Revision:
- B Amended housing layout added
 - C GMSF Land Allocation added

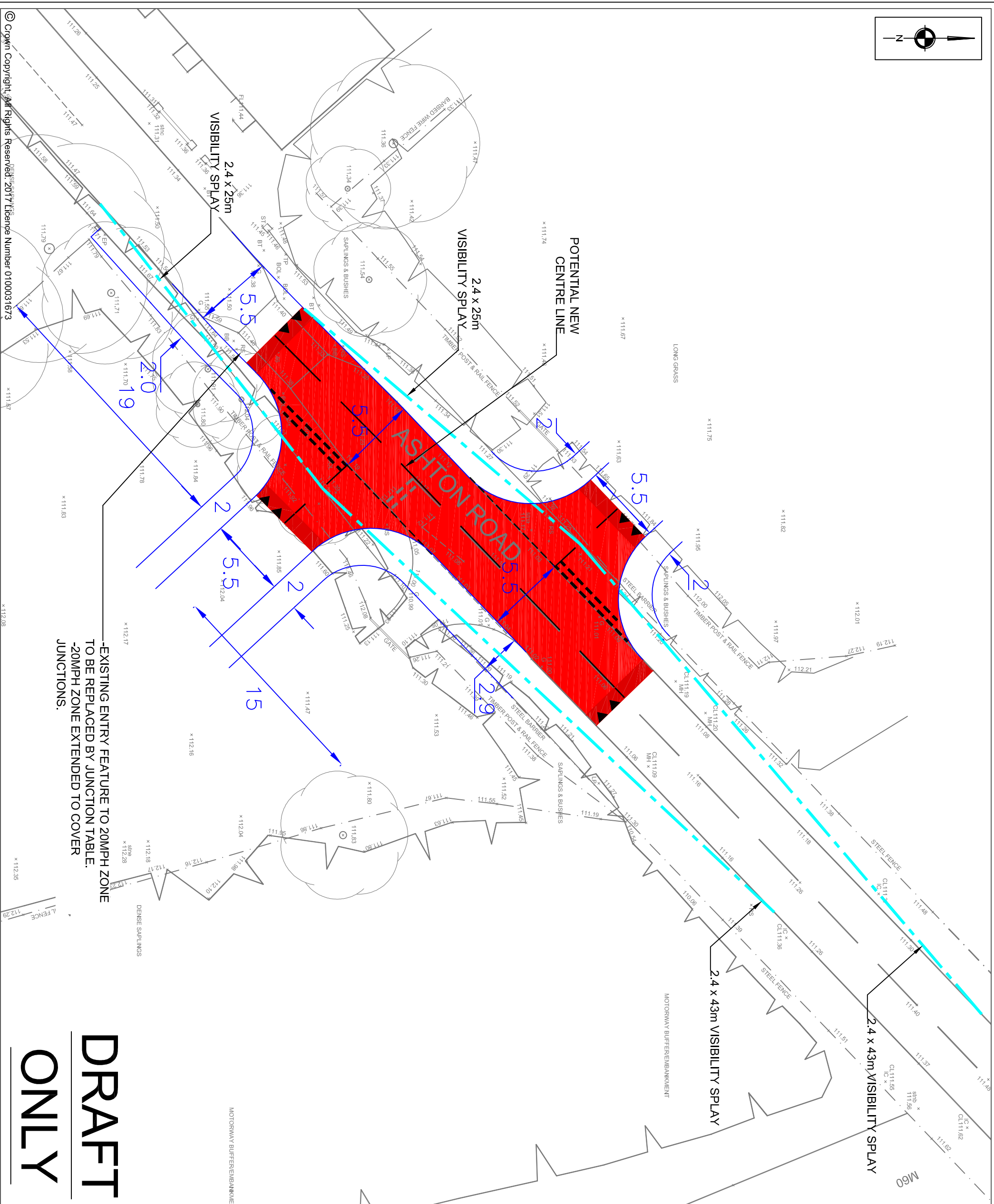
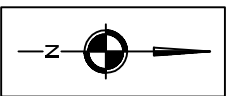
Project Title:
Residential Development

Address:
Ashton Road,
Woodhouses,
Failsworth.

Drawing:
Contextual plan

Drawing No:
DJ/ARW/CP/01

Drawn: BP	Chd: GB	Date: Date 22/11/2016
Scale: 1:500	Paper Size: A3	



NOTES

REVISIONS			
REV	DESCRIPTION	DATE	BY
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$$\frac{S}{Q} = P$$

Transportation Planning : Infrastructure Design

Colwyn Chambers, 19 York Street, Manchester, M2 3BA, Tel 0161 832 4400,
www.scptransport.co.uk, Email info@scptransport.co.uk

Client Name:

Project Title:

ASHTON ROAD, WOODHOUSES

Drawing Title:

POTENTIAL SITE ACCESS
ARRANGEMENT

Drawn By: BA

Date: 14.11.2017

Checked:	Scale:
WB	1:500 @ A3

Status:	Approved/Unapproved:
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Drawing No.

SCP/17375/TBC

Rev.

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DRAFT

EXTENDED PHASE 1 HABITAT SURVEY OF LAND OFF ASHTON ROAD, WOODHOUSES, FAILSWORTH

FEBUARY 2019



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1.0 INTRODUCTION

1.1 Rachel Hacking Ecology Limited was commissioned in 2019 by Mr. David Jones to undertake an Extended Phase 1 Habitat Survey of land off Ashton Road in Woodhouses, Failsworth, Greater Manchester. The site has been identified for allocation within the Draft Greater Manchester Spatial Framework for residential development. An Extended Phase 1 Habitat Survey is required to provide an overview of the habitats present within the site, to assess any potential protected species issues on the site and to find ecological constraints and opportunities.

Site Description

1.2 The site is located north of Ashton Road in Failsworth, Greater Manchester (O.S. grid reference: SD 91254 01086 – See Figure 1). The site comprises a field of improved grassland. A disused canal runs through the centre of the site and a hedgerow borders parts of the site. The disused canal is not proposed to be affected as part of any future development. A tree belt separates the site from the M60 on the eastern boundary. The site is surrounded by residential development to the south and west, farmland to the north and residential development and farmland in the wider environment.

Aims of Survey

1.3 The aims of the survey were to:

- Describe and map the habitats present on the site,
- Assess the potential for protected species to be present on the site or just outside the immediate site boundary,
- Identify where further survey may be necessary for a future planning application.

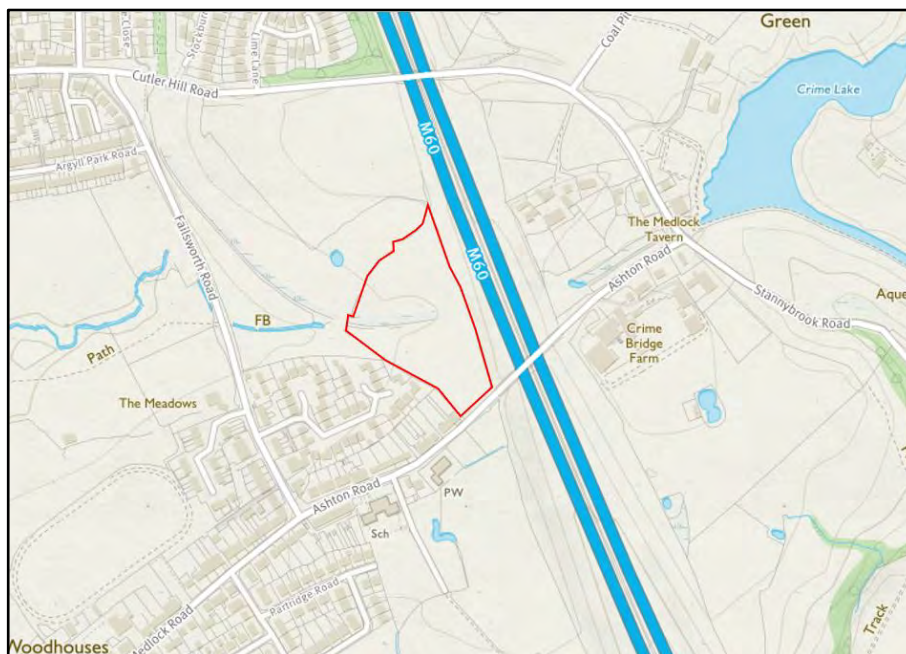


Figure 1 showing the site within the red line boundary

2.0 METHODOLOGY

- 2.1 A Phase 1 Habitat survey was undertaken to JNCC standards (JNCC, 2010). The site was walked, and each habitat was assigned a Phase 1 habitat category. The habitats surrounding the site were also mapped. Species lists were taken at locations of botanical interest. All botanical nomenclature follows Stace, 2010. A Phase 1 map was produced showing habitat boundaries.
- 2.2 During the Phase 1 Habitat survey, the habitats were assessed for their potential to support protected species. This included, for example, looking for signs of Badger activity (e.g. setts, paths, latrines and hairs on fences), assessing any waterbodies on site or near the site for their potential to support Great Crested Newt and assessing the potential for any buildings or mature trees to be used by bats.
- 2.3 The site was also surveyed for invasive, non-native plant species such as Japanese Knotweed and Giant Hogweed.
- 2.4 Rosie Fisher and Kate Reed (Ecologists) undertook the survey on 4th February 2019. The weather was dry and overcast. All surveyors are fully trained and experienced in habitat and protected species surveys. February is sub-optimal time of the year for botanical work, however due to the type of habitats present on site, a thorough assessment could be undertaken. There were no constraints to the survey as the site was fully accessible.

3.0 RESULTS

HABITATS

- 3.1 The Phase 1 Habitat Map can be found at the back of the report. The habitats on site are described below.

Improved Grassland

- 3.2 The majority of the site comprises species-poor, improved grassland (see Photograph 1). This is low-growing, managed by cutting and dominated by Perennial Rye-grass *Lolium perenne*. Species frequently present include White Clover *Trifolium repens*, Creeping Buttercup *Ranunculus repens* and Common Mouse-ear *Cerastium fontanum*. Occasional species present include Creeping Thistle *Cirsium arvense*, Red Fescue *Festuca rubra* and Creeping Bent *Agrostis stolonifera*.



Photograph 1 showing the improved grassland

Tall, Ruderal Herb

- 3.3 Strips of tall, ruderal vegetation are present along the southern boundary of the site and along the banks of the disused canal (see Photograph 2). Abundant species include Great Willowherb *Epilobium hirsutum*, Common Nettle *Urtica dioica*, Rosebay Willowherb *Chamerion angustifolium*. Occasional species present include Hogweed *Heracleum sphondylium*, Hedge Bedstraw *Galium album* and Bramble *Rubus fruticosus* agg.



Photograph 2 showing tall, ruderal vegetation

Continuous and Scattered Scrub

- 3.4 Areas of scattered scrub (saplings) are present on parts of the tall, ruderal vegetation and in the field boundaries (see Photograph 3). Species include Hawthorn *Crataegus monogyna*, Elder *Sambucus nigra* and Ash *Fraxinus excelsior*. Patches of continuous scrub are also present along the northern field boundary and at the end of the disused canal (see Photograph 4). The dominant species present are Bramble *Rubus fruticosus* agg. and Hawthorn with Common Nettle *Urtica dioica* also present.



Photograph 3 showing scattered scrub



Photograph 4 showing continuous scrub

Swamp

- 3.5 The disused canal in the centre of the site is dominated by Reed Canary-grass *Phalaris arundinacea* (see Photograph 5). This habitat mapped as swamp. Himalayan Balsam *Impatiens glandulifera* is scattered occasionally towards the western end.



Photograph 5 showing the swamp habitat in the disused canal

Boundaries

- 3.6 A mixture of wooden and post and wire fences line the site boundaries on all sides. Stone walls line the disused canal bank. These have partially collapsed. An intact species-poor hedgerow follows the southern site boundary along Ashton Road (see Photograph 6). This is dominated by Hawthorn *Crataegus monogyna* and Blackthorn *Prunus spinosa*. Occasional species intermixed include Dogwood *Cornus sanguinea*, Holly *Ilex aquifolium* and Hazel *Corylus avellana*. Understorey species include Creeping Bent *Agrostis stolonifera*, Wood Aven *Geum urbanum*, Garlic Mustard *Alliaria petiolata* and Ivy *Hedera helix*. Other sections of defunct hedgerow are present on the northern and western field boundaries (see Photograph 7). Woody species include Elder *Sambucus nigra*, Hawthorn and Holly. Species present as an understory include False Oat-grass *Arrhenatherum elatius* and Fern-leaved Bramble *Rubus laciniatus*.



Photograph 6 showing the hedgerow along Ashton Road



Photograph 7 showing defunct hedgerow on site

Wet Ditch

- 3.7 A ditch is present off site, along the western boundary (see Photograph 8). This drains off the surrounding land and has a low water level. No aquatic vegetation is present, the banks are sloped, and covered by grass and scrub species.



Photograph 8 showing ditch off site

PROTECTED SPECIES

Great Crested Newt

- 3.8 Great Crested Newt *Triturus cristatus* is a European Protected Species (EPS) under the Conservation (Natural Habitats etc.) Regulations 1994. This is implemented in the UK through the Conservation of Habitats and Species Regulations 2017 and the species is fully protected under the Wildlife and Countryside Act 1981 (as amended).
- 3.9 No ponds occur on site. Four waterbodies are present within 250m of the site. Two of these are separated from the site by the M60 which is considered a significant barrier to newt movement. One pond lies 110m to the south of the site. This is in a field and separated from the site by Ashton Road. The other pond is in a field 35m to the north-west of the site. There is no habitat connectivity between these two ponds and the site. The closest pond lies in the centre of a field.
- 3.10 The closest pond was assessed from the land for its suitability to support Great Crested Newt (GCN) using a Habitat Suitability Index (HSI). A HSI is used to assess ponds for suitability to support GCN. A score of 1 is optimal GCN habitat, whereas 0 is unsuitable. The pond is surrounded by marshy grassland which is favourable terrestrial habitat for GCN. The pond is approximately 150m² and the margins are unshaded. The water level was low at the time of survey; therefore, it is likely to dry out annually. Approximately 80% of the pond is covered by submerged vegetation which is mainly grasses, Soft-rush *Juncus effusus* and Horsetail *Equisetum* sp. This pond has a GCN HSI score of 0.64 which is 'Average' suitability for GCN.
- 3.11 The disused canal on site was also assessed using the HSI criteria. The canal is approximately 400m², it is covered with emergent vegetation and a strip of ruderal vegetation surrounds it. No open water exists. A small section of the canal is shaded by the surrounding vegetation and canal walls. Outside the canal banks, the surrounding vegetation is unfavourable habitat for GCN because the species-poor, low-growing grassland provides little cover. This pond has a GCN HSI score of 0.62 which is 'Average' suitability for GCN.
- 3.12 The site supports limited suitable GCN terrestrial habitat. The improved grassland is not considered to be suitable terrestrial habitat for GCN. The swamp, ruderal vegetation, scrub and hedgerow bases, outside of the proposed residential zone, offer suitable GCN foraging and commuting habitat.

Bat

- 3.13 All bat species are European Protected Species under the Conservation (Natural Habitats etc.) Regulations 1994. This is implemented in the UK through the Conservation of Habitats and Species Regulations 2017. Bats are also protected under the Wildlife and Countryside Act 1981 (as amended), the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act (NERC, 2006).

- 3.14 No built structures or trees exist on site. The saplings on site (classed as scattered scrub) were all inspected for bat roosting features, such as cavities, limb damage or peeling bark. No such features or evidence of bat use could be found associated with any trees on the site. Bats use linear landscape features for foraging and commuting and it is possible that bats forage and commute along the hedgerows and disused canal.

Badger

- 3.15 Badgers *Meles meles* are protected under the Protection of Badgers Act 1992 and The Wildlife and Countryside Act 1981 (as amended). These Acts, for example, make it illegal to disturb a Badger whilst it is in a sett, to kill, injure or take a Badger and to obstruct the entrance to a Badger sett.
- 3.16 No Badger setts were found on site or on the site boundary. No evidence of Badger activity such as latrines, Badger footprints or hair are present on the site.

Water Vole

- 3.17 Water Vole *Arvicola amphibius* is fully protected under the Wildlife and Countryside Act 1981 (as amended). This act, for example, makes it illegal to intentionally kill, injure or take (capture) a Water Vole or intentionally or recklessly damage, destroy or obstruct access to any structure or place which Water Voles use for shelter or protection or disturb Water Voles while they are using such a place.
- 3.18 The proposed development area of the site does not support optimal Water Vole habitat. The disused canal on site was inspected for evidence of Water Vole. No field signs of Water Vole such as latrines, feeding remains or burrows, was found. The water level is low, and the eastern half of the canal is dry (see Photograph 9). This is sub-optimal habitat for Water Vole. The main body of the canal is covered in emergent vegetation.



Photograph 9 showing the disused canal on site

- 3.19 A wet ditch lies directly west of the western site boundary (see Photograph 8). The banks of the ditch were inspected, and no burrows or other evidence of Water Vole were found. The ditch is shallow, with sloped banks and lacks marginal vegetation. Therefore, is considered sub-optimal for Water Vole. The ditch, disused canal and canal banks will not be affected by the proposals.

Nesting Birds

- 3.20 All bird species are protected at their nest under the Wildlife and Countryside Act 1981 (as amended).
- 3.21 The dense scrub and hedgerows offer suitable nesting habitat for birds such as passerines. The taller emergent vegetation in the disused canal also may offer nesting habitat. The site is not considered suitable for ground-nesting birds due to the amount of scrub present, which can be used as corvid perches.

INVASIVE SPECIES

- 3.22 Himalayan Balsam *Impatiens glandulifera* was found, scattered in the swamp habitat of the disused canal (see Photograph 10). This species is listed on Schedule 9 Part II (plants) of the Wildlife and Countryside Act 1981 (as amended), making it an offence to allow the species to grow in the wild.



Photograph 10 showing the previous years growth of Himalayan Balsam on site

4.0 DATA SEARCH RESULTS

- 4.1 292 protected and notable species records were returned from Greater Manchester Local Records Centre (GMLRC) from a 1km radius around the site. No records were returned from the site itself. A selection of the data search records can be found in Appendix 1. Badger records are not included within Appendix 1.

Protected Species

- 4.2 Four records of Great Crested Newt were returned. These were all recorded in 2012 from a site 220m to the south of the site, separated from the site by Ashton Road.
- 4.3 Six bat roosts were recorded in the search area. These are Pipistrelle *Pipistrellus* sp. and bat species recorded between 1999 and 2014. The closest record to site is a bat species recorded in a dwelling 350m north-west of the site. 39 other records of bats were returned. These are mainly foraging bats. Species recorded: bat species, Common Pipistrelle *Pipistrellus pipistrellus*, Pipistrelle sp., Daubenton's Bat *Myotis daubentonii* and Whiskered Bat *Myotis mystacinus*.
- 4.4 One record of Badger *Meles meles* was returned. This was a disused sett recorded 350m from the site in 2007. This is separated from the site by the M60 and farm complexes.
- 4.5 Three Water Vole *Arvicola amphibius* records were returned for the search area. Two records are from 2001 along Fairbottom Branch Canal. This lies 570m east of the site across major roads, farmland and buildings. The third record was recorded in 2002 along Hollinwood Branch Canal which lies 850m south of the site. This is separated from the site by farmland, the River Medlock and Ashton Road.
- 4.6 203 records of bird have been recorded within the search area. Two birds were recorded in the field adjacent to the site to the north. These were Reed Bunting and Grasshopper Warbler. Eighteen species were recorded and Table 1 details the species and date ranges.

Table 1 – Bird Species Returned from the Data Search			
Species	Scientific Name	No. records	Date range
Barn Owl	<i>Tyto alba</i>	7	2009-2010
Bullfinch	<i>Pyrrhula pyrrhula</i>	28	2008-2015
Cuckoo	<i>Cuculus canorus</i>	1	2010
Dunnoek	<i>Prunella modularis</i>	4	2008-2015
Grasshopper Warbler	<i>Locustella naevia</i>	4	2009-2015
Grey Heron	<i>Ardea cinerea</i>	1	2015
Grey Partridge	<i>Perdix perdix</i>	1	2008
Herring Gull	<i>Larus argentatus</i>	1	2015
House Sparrow	<i>Passer domesticus</i>	1	2011
Kingfisher	<i>Alcedo atthis</i>	64	1999-2017
Lapwing	<i>Vanellus vanellus</i>	25	2008-2015
Lesser Redpoll	<i>Acanthis cabaret</i>	2	2009-2013
Linnet	<i>Carduelis cannabina</i>	2	2010
Reed Bunting	<i>Emberiza schoeniclus</i>	30	2008-2016
Song Thrush	<i>Turdus philomelos</i>	15	2008-2015
Spotted Flycatcher	<i>Muscicapa striata</i>	4	2009-2014
Starling	<i>Sturnus vulgaris</i>	2	2009-2015
Willow Tit	<i>Poecile montanus</i>	11	1992-2001

4.7 No records of reptile were returned. No Otter *Lutra lutra* records were returned.

PROTECTED SITES

4.8 No statutory protected sites exist on the site. Four statutory protected sites occur within 3 kilometres of the allocation site. These are:

- Hollinwood Branch Canal Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR). This is designated for its mesotrophic standing water system. This lies 750m south of the site, separated by farmland, roads and the River Medlock.
- Rochdale Canal SSSI and Special Area of Conservation (SAC) lies 1.5km north-west of the site, separated by residential development, roads, farmland and Lord's Brook. It is designated for its habitats suitable for submerged aquatic plants including Floating Water-plantain *Luronium natans*.
- Clayton Vale LNR lies 2.7km south-west of the site, across farmland and infrastructure. This comprises woodland and grassland bordering the River Medlock.
- Rocher Vale LNR lies 2.8km east of the site, separated by farmland and major infrastructure including the M60. This is important for its woodland, heathland and geology.

- 4.9 No non-statutory designated sites are present on site or adjacent to the site. Three non-statutory designated sites occur within 500m of the site. Daisy Nook Country Park and Crime Lake & Fairbottom Branch Canal Site of Biological Importance (SBI) lie 250m east of the site. Habitats present here include woodland, open water and wetland habitats. Lord's Brook Flushes SBI is a grassland located 400m west of the site.
- 4.10 The development site itself lies within an SSSI Impact Risk Zone. This lists certain developments that if built in the area may affect designated sites nearby. It is stated Natural England should be consulted for proposals involving residential developments of over 100 units. The proposals are for less than 100 units and therefore, the development type is not listed as a risk.

5.0 ASSESSMENT

HABITATS

- 5.1 The Phase 1 Habitats present on the site are common throughout the UK. No nationally rare or locally rare plant species were located during the extended Phase 1 Habitat Survey.
- 5.2 The majority of the site offer limited ecological value. The improved grassland is species-poor and offers little cover for wildlife. The hedgerows and dense scrub offer nesting habitat for birds. The swamp and other parts of the disused canal are of high ecological value. The swamp may offer habitat for amphibians and the ruderal vegetation and scrub provide a pollen and a nectar source for invertebrates.

PROTECTED SPECIES

Great Crested Newt

- 5.3 No field ponds occur on site. The disused canal exists on site, which has no open water. Four ponds exist within 250 metres of the site. Two can be discounted as they lie on the other side of the M60, a significant barrier to newt dispersal. The pond to the south of the site lies over a road, with no habitat connectivity to the site. The nearest pond lies within the centre of the field to the north of the site, with no habitat connectivity to the site. This pond and the disused canal on site both score 'Average' under the HSI assessment. The data search returned four records of Great Crested Newt (GCN) from 220m to the south of the site. This location is separated from the site by Ashton Road.
- 5.4 The wider site supports suitable terrestrial habitat for GCN within the swamp, ruderal vegetation, scrub and hedgerow bases. These habitats, as well as the disused canal, will not be affected by the proposals and will be outside of the residential zone. Only the improved grassland will be affected by development, which is unsuitable terrestrial habitat for GCN. For any future planning application, it is not considered necessary to undertake GCN surveys due to the lack of GCN habitat being affected. It is reasonably unlikely that GCN occur on the proposed construction site. If necessary, the construction can be undertaken under Reasonable Avoidance Measures.
- 5.5 The residential development indicative layout includes a wide buffer around the disused canal, protect the habitats within the canal. This will be designed to enhance the canal and include habitats such as wildflower grassland and native shrub planting. This landscaping will bring biodiversity gain to the site and enhance the habitats for GCN.

Bats

- 5.6 No buildings or mature trees exist on the site. The saplings on site were assessed from the ground and no suitable cavities or other features that bats could use, could be located. Four species of bat were returned in the data search. It is possible bats use the site for foraging, in particular along the disused canal and hedgerows. It is recommended that for any future planning application, the proposals include a sensitive lighting scheme, with light aimed away from the

hedgerows and disused canal. No further bat survey work is considered necessary for any future planning application.

Badger

- 5.7 No evidence of Badger activity or Badger setts could be located within the site or immediately adjacent to the site. No active Badger setts were returned in the data search. No further Badger work is necessary for any future planning application.

Water Vole

- 5.8 No evidence of Water Vole activity was located along the disused canal on site or ditch adjacent to the site. Three records of Water Vole were returned in the data search. Two records are separated by the M60 which is considered a major barrier to Water Vole movement. The final record is 17 years old and holds no habitat connectivity to the site. No further Water Vole survey is considered necessary.

Nesting Birds

- 5.9 Eighteen species of bird were returned in the area in the data search. The dense scrub and hedgerows, plus the taller emergent vegetation, provide suitable bird nesting habitat. If work to these habitats will proceed within the bird nesting season (generally March-August), a nesting bird survey will be required immediately prior to any work commencing. The site is not considered suitable for ground-nesting bird species.

INVASIVE SPECIES

- 5.10 Himalayan Balsam *Impatiens glandulifera* was found on site, scattered in the swamp habitat of the disused canal. This species will require eradication or control, using hand-pulling only.

PROTECTED SITES

- 5.11 No statutory protected sites lie within the allocation site or immediately adjacent to the site. Four statutory protected sites occur within 3km of the site, the closest is 750m south of the site. Three non-statutory designated sites occur within 500m of the site; the closest lies 250m to the east. At these distances, and with adequate barrier habitats inbetween the site and the protected sites, there is expected to be no deleterious impact on the sites from any future development. The type of development proposed is not listed on the SSSI Impact Risk Zone criteria.

6.0 RECOMMENDATIONS

- 6.1 Protected species are a material consideration within the planning process. For a future planning application, the following work or survey may be required, depending on the design of the site:

- **Nesting Birds** - If any tree felling or other dense vegetation clearance work needs to be carried out within the bird nesting season (generally March to August), then a nesting bird survey will be required immediately prior to work commencing.

Construction Environmental Management Plan

- 6.2 A (CEMP) is recommended to be implemented during construction, to prevent the construction phase having a detrimental impact on the disused canal to remain.

Invasive Species

- 6.3 The Himalayan Balsam should be removed prior to work commencing or during construction, by being hand pulled prior to the plant setting seed. This will need to be done over a couple of years to deplete the seed bank.

Habitat Enhancement and Creation

- 6.4 During the masterplanning stage, the following recommendations aim to increase the ecological value of the site and bring biodiversity gain to the site:

- A habitat buffer zone around the disused canal, to enhance the canal and prevent construction impacts. This should be a species-rich grassland.
- Enhancement of the canal, such as removal of invasive species and scrub.
- A habitat buffer zone along the northern boundary of the site, and new native species-rich hedgerows along other boundaries.
- Tree and shrub planting should include a mixture of native species.
- Soft landscaping should include the provision of native and non-native flowering perennial species, to provide a pollen and nectar source for invertebrates.
- Bird and bat boxes erected onto new dwellings.

7.0 REFERENCES

JNCC. *Phase 1 Habitat Survey – a technique for environmental audit*, JNCC, Updated 2010.

Preston, C.D., Pearman, D. & Dines, T. (2002). *New Atlas of the British and Irish Flora*. Oxford University Press.

Stace, C. A. (2010). *New Flora of the British Isles, 3rd Edition*. Cambridge University Press.

APPENDIX 1 – DATA SEARCH RESULTS

Species	Grid Ref	Site	Date	Abundance
Great Crested Newt	SD912007	Bottom Field Farm	22/06/2012	1 Larva
Great Crested Newt	SD912007	Bottom Field Farm	04/05/2012	2 Female
Great Crested Newt	SD912007	Bottom Field Farm	04/05/2012	3 Male
Great Crested Newt	SD912007	Bottom Field Farm	29/03/2012	1 Egg/Ovum; 4 Female; 5 Male
Bat sp	SD90830128	Dwelling M35 9NE	16/11/2013	Mixed Roost
Pipistrelle sp	SD91590196	Dwelling OL8 3PQ, Oldham	23/06/2014	Mixed Roost
Daubenton's Bat	SD920010	Oldham	05/09/2009	2 Adult Foraging
Daubenton's Bat	SD92100084	Daisy Nook	29/07/2012	1 Aural bat detector
Pipistrelle sp	SD908016	Failsworth	28/07/2011	1 Adult Male Casualty (not road); Released
Pipistrelle sp	SD91590196	Oldham	23/06/2014	1 Juvenile Male Casualty (not road); Released
Pipistrelle sp	SD919005	Oldham	18/06/2010	6 Adult Aural bat detector
Pipistrelle sp	SD920006	Oldham	05/09/2009	1 Adult Foraging
Pipistrelle sp	SD920010	Oldham	05/09/2009	1 Adult Foraging
Barn Owl	SD920006	Daisy Nook Country Park	20/03/2010	1
Barn Owl	SD920006	Daisy Nook Country Park	12/12/2009	1
Barn Owl	SD920006	Daisy Nook Country Park	30/10/2009	2
Barn Owl	SD920006	Daisy Nook Country Park	19/07/2009	3
Barn Owl	SD920006	Daisy Nook Country Park	12/07/2009	2
Barn Owl	SD920006	Daisy Nook Country Park	08/07/2009	1
Barn Owl	SD920006	Daisy Nook Country Park	02/05/2009	1
Kingfisher	SD917005	Daisy Nook Garden Centre and environs	31/05/2015	1
Kingfisher	SD917006	River Medlock	08/03/2007	
Kingfisher	SD917013	Crime Lake Failsworth	21/12/2017	1
Kingfisher	SD917013	Crime Lake Failsworth	17/11/2017	1
Kingfisher	SD917013	Crime Lake Failsworth	05/11/2017	1
Kingfisher	SD917013	Crime Lake Failsworth	31/07/2017	1
Kingfisher	SD917013	Crime Lake Failsworth	05/02/2017	1
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	04/02/2017	1
Kingfisher	SD917013	Crime Lake Failsworth	14/01/2017	1

Species	Grid Ref	Site	Date	Abundance
Kingfisher	SD917013	Crime Lake Failsworth	26/10/2016	1
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	19/10/2016	2
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	04/10/2016	1
Kingfisher	SD917013	Crime Lake Failsworth	27/03/2016	1
Kingfisher	SD917013	Crime Lake Failsworth	27/09/2015	1
Kingfisher	SD917013	Crime Lake Failsworth	20/02/2015	1
Kingfisher	SD917013	Crime Lake Failsworth	26/12/2014	1
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	13/12/2014	1
Kingfisher	SD917013	Crime Lake Failsworth	05/10/2014	1
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	27/09/2014	1
Kingfisher	SD917013	Crime Lake Failsworth	07/09/2014	1
Kingfisher	SD917013	Crime Lake Failsworth	22/06/2014	1
Kingfisher	SD917013	Crime Lake Failsworth	16/03/2014	1 WeBS - Standard Core Count
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	09/03/2014	1
Kingfisher	SD917013	Crime Lake Failsworth	22/02/2014	1
Kingfisher	SD917013	Crime Lake Failsworth	16/02/2014	1 WeBS - Standard Core Count
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	11/02/2014	1 Male
Kingfisher	SD917013	Crime Lake Failsworth	01/01/2011	Adult
Kingfisher	SD917013	Crime Lake Failsworth	14/11/2010	1
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	01/01/2010	Adult
Kingfisher	SD917013	Crime Lake Failsworth	04/10/2009	1
Kingfisher	SD917013	Crime Lake Failsworth	20/09/2009	1
Kingfisher	SD917013	Crime Lake Failsworth	15/03/2009	1
Kingfisher	SD917013	Crime Lake Failsworth	04/02/2009	1
Kingfisher	SD917013	Crime Lake & Fairbottom Canal	01/01/2009	Adult
Kingfisher	SD918005	Fairbottom Branch Canal	25/12/2017	1
Kingfisher	SD918005	Fairbottom Branch Canal	18/11/2017	1
Kingfisher	SD918005	Fairbottom Branch Canal	27/02/2017	1
Kingfisher	SD918005	Fairbottom Branch Canal	25/10/2015	1

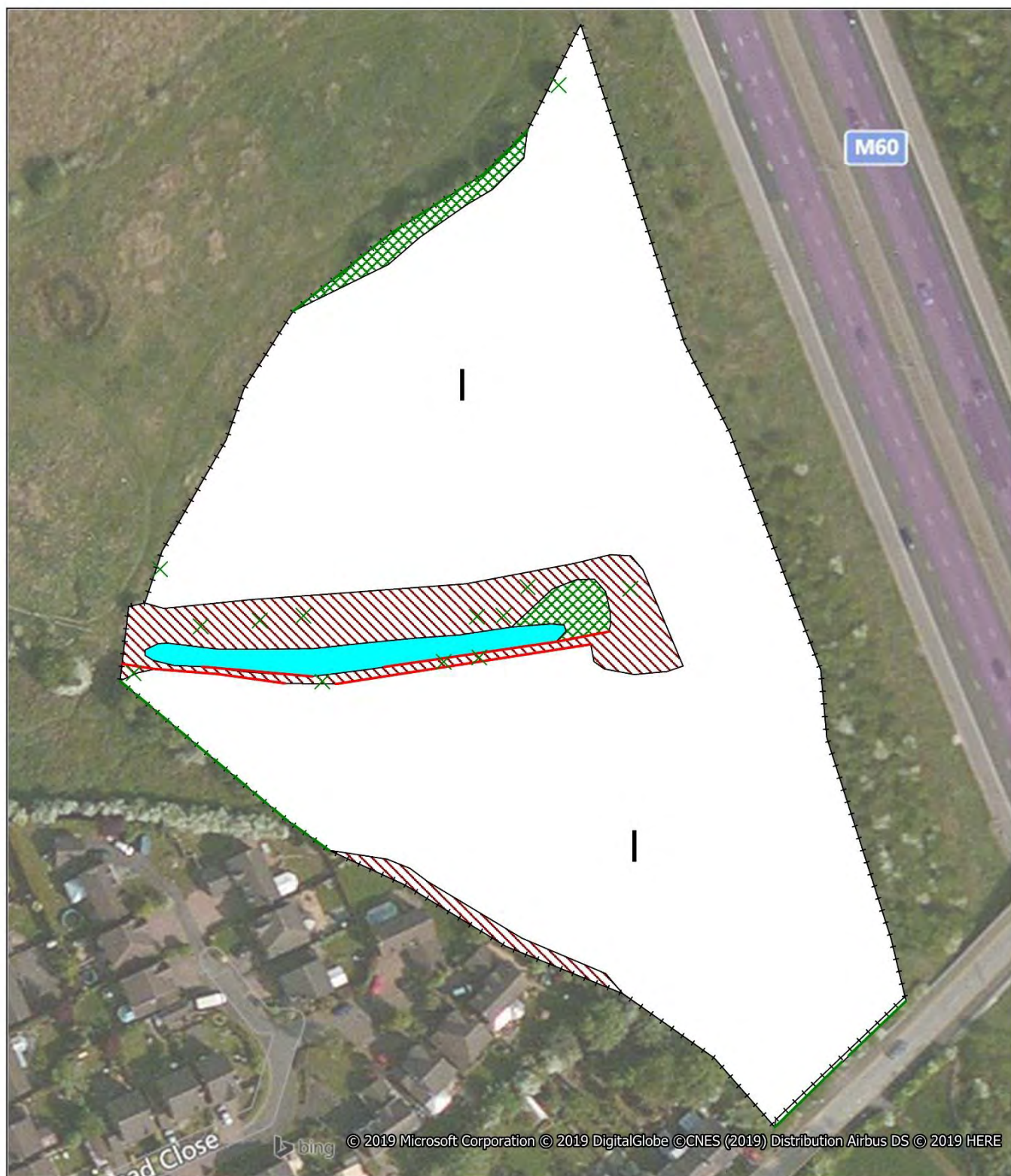
Species	Grid Ref	Site	Date	Abundance
Kingfisher	SD920006	Daisy Nook Country Park	30/12/2014	1
Kingfisher	SD920006	Daisy Nook Country Park	29/05/2009	
Kingfisher	SD920008	Daisy Nook R. Medlock	20/03/2016	1
Kingfisher	SD920008	Daisy Nook R. Medlock	06/03/2016	1
Kingfisher	SD920008	Daisy Nook R. Medlock	16/03/2014	1
Kingfisher	SD920010	Sammy's Basin	18/02/2017	1
Kingfisher	SD920010	Sammy's Basin	10/08/2016	1
Kingfisher	SD920010	Sammy's Basin	27/02/2015	1
Kingfisher	SD920010	Sammy's Basin	11/10/2014	1
Kingfisher	SD920010	Sammy's Basin	28/08/2014	1
Kingfisher	SD921008	Aqueduct Daisy Nook	11/10/2010	1
Kingfisher	SD921008	Aqueduct Daisy Nook	17/04/2010	1
Kingfisher	SD921008	Aqueduct Daisy Nook	21/02/2009	1
Kingfisher	SD922010	Medlock Valley	01/01/2010	1 Adult
Bullfinch	SD917013	Crime Lake Failsworth	08/03/2015	2 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	04/12/2011	3 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	06/11/2011	4 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	16/10/2011	2 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	22/01/2011	3 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	20/01/2011	2 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	19/12/2010	1 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	12/12/2010	1 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	17/10/2009	2 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	08/05/2009	1 Adult Male; H - observed in suitable nesting habitat
Bullfinch	SD917013	Crime Lake Failsworth	21/02/2009	1 - Field Record
Bullfinch	SD917013	Crime Lake Failsworth	02/01/2009	6 - Field Record
Bullfinch	SD919004	Hollinwood Branch Canal	25/05/2016	2 Adult; H - observed in suitable nesting habitat
Bullfinch	SD919004	Hollinwood Branch Canal	22/09/2015	1 - Field Record
Bullfinch	SD919004	Hollinwood Branch Canal	02/07/2014	2 H - observed in suitable nesting habitat
Bullfinch	SD919004	Hollinwood Branch Canal	03/12/2013	2 Adult - Field Record
Bullfinch	SD919004	Hollinwood Branch Canal	07/04/2009	2 Adult; P - Pair in suitable nesting habitat
Bullfinch	SD919011	Pinch Farm Daisy Nook	23/11/2015	3 - Field Record

Species	Grid Ref	Site	Date	Abundance
Bullfinch	SD919011	Pinch Farm Daisy Nook	11/07/2014	1 - Field Record
Bullfinch	SD919011	Pinch Farm Daisy Nook	26/11/2010	2 - Field Record
Bullfinch	SD920006	Daisy Nook Country Park	31/12/2009	2 - Field Record
Bullfinch	SD920006	Daisy Nook Country Park	24/12/2009	1 Female - Field Record
Bullfinch	SD920006	Daisy Nook Country Park	24/12/2009	2 - Field Record
Bullfinch	SD920006	Daisy Nook R. Medlock	26/11/2009	4 Adult - Field Record
Bullfinch	SD920006	Daisy Nook R. Medlock	07/04/2009	2 Adult; P - Pair in suitable nesting habitat
Bullfinch	SD920007	Daisy Nook (West) SBI, Daisy Nook West SBI	26/11/2009	4 Adult - Field Record
Cuckoo	SD915007	Woodhouses Failsworth	30/04/2010	1 Adult; S - Singing male - Field Record
Dunnock	SD917013	Crime Lake Failsworth	21/06/2009	2 FL - recently Fledged young
Dunnock	SD919004	Hollinwood Branch Canal	14/06/2015	1 Adult; H - observed in suitable nesting habitat
Dunnock	SD919004	Hollinwood Branch Canal	14/06/2014	2 Adult; H - observed in suitable nesting habitat
Grasshopper Warbler	SD912012	Cutler Hill	20/05/2010	1 Adult; H - observed in suitable nesting habitat
Grasshopper Warbler	SD917013	Crime Lake Failsworth	03/05/2010	1 - Field Record
Grasshopper Warbler	SD919011	Pinch Farm Daisy Nook	12/07/2015	1 S - Singing male - Field Record
Grasshopper Warbler	SD920006	Daisy Nook Country Park	19/04/2009	1 Adult; S - Singing male - Field Record
Herring Gull	SD917013	Crime Lake Failsworth	09/02/2015	7 - Field Record
House Sparrow	SD920006	Daisy Nook Country Park	30/08/2011	20 - Field Record
Lapwing	SD917004	Daisy Nook At M60	13/10/2010	1 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	01/03/2015	5 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	17/04/2011	2 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	27/03/2011	2 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	26/11/2010	30 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	13/10/2010	6 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	28/05/2010	2 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	17/04/2010	8 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	07/03/2010	6 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	19/12/2009	30 Adult - Field Record
Lapwing	SD917013	Crime Lake Failsworth	13/12/2009	7 - Field Record

Species	Grid Ref	Site	Date	Abundance
Lapwing	SD917013	Crime Lake Failsworth	26/04/2009	6 P - Pair in suitable nesting habitat
Lapwing	SD917013	Crime Lake Failsworth	21/03/2009	10 Adult; T - permanent Territory
Lapwing	SD917013	Crime Lake Failsworth	15/03/2009	6 D - courtship and Display - Field Record
Lapwing	SD917013	Crime Lake Failsworth	05/03/2009	1 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	15/02/2009	2 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	01/02/2009	40 - Field Record
Lapwing	SD917013	Crime Lake Failsworth	01/01/2009	6 - Field Record
Lapwing	SD919004	Hollinwood Branch Canal	14/06/2015	4 MixedAges; FL - recently Fledged young
Lapwing	SD919004	Hollinwood Branch Canal	07/04/2009	4 Adult; H - observed in suitable nesting habitat
Lesser Redpoll	SD907002	Brookdale Golf Course Failsworth	24/04/2009	16 - Field Record
Lesser Redpoll	SD919004	Hollinwood Branch Canal	03/12/2013	4 Adult - Field Record
Linnet	SD917013	Crime Lake Failsworth	09/04/2010	2 - Field Record
Linnet	SD920010	Sammy's Basin	12/09/2010	1 - Field Record
Reed Bunting	SD912012	Cutler Hill	20/05/2010	1 Adult; H - observed in suitable nesting habitat
Reed Bunting	SD915007	Woodhouses Failsworth	21/06/2009	1 Female; FF - carrying Faecal sac or Food
Reed Bunting	SD915007	Woodhouses Failsworth	21/06/2009	Present Adult; FL - recently Fledged young
Reed Bunting	SD917013	Crime Lake Failsworth	16/10/2011	1 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	03/07/2011	3 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	12/06/2011	3 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	06/03/2011	1 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	18/07/2010	2 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	06/06/2010	2 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	09/05/2010	3 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	19/04/2010	2 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	29/08/2009	1 - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	21/06/2009	2 Male - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	26/04/2009	Present Adult; T - permanent Territory
Reed Bunting	SD917013	Crime Lake Failsworth	19/04/2009	1 Male - Field Record
Reed Bunting	SD917013	Crime Lake Failsworth	07/03/2009	1 - Field Record

Species	Grid Ref	Site	Date	Abundance
Reed Bunting	SD919004	Hollinwood Branch Canal	25/05/2016	1 Adult; S - Singing male - Field Record
Reed Bunting	SD919004	Hollinwood Branch Canal	14/06/2014	1 Adult; H - observed in suitable nesting habitat
Reed Bunting	SD919011	Pinch Farm Daisy Nook	27/03/2011	1 - Field Record
Reed Bunting	SD920006	Daisy Nook Country Park	19/06/2011	2 - Field Record
Reed Bunting	SD920006	Daisy Nook Country Park	02/05/2009	1 - Field Record
Reed Bunting	SD920010	Sammy's Basin	11/04/2015	1 S - Singing male - Field Record
Reed Bunting	SD920010	Sammy's Basin	20/06/2010	1 - Field Record
Reed Bunting	SD920010	Sammy's Basin	12/04/2008	1 P - Pair in suitable nesting habitat
Song Thrush	SD917013	Crime Lake Failsworth	29/11/2014	1 S - Singing male - Field Record
Song Thrush	SD919004	Hollinwood Branch Canal	22/09/2015	1 Adult; Resident - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	29/12/2015	1 S - Singing male - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	05/06/2015	4 S - Singing male - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	07/03/2015	2 S - Singing male - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	27/02/2015	1 - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	14/02/2015	3 S - Singing male - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	11/07/2014	3 S - Singing male - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	20/04/2014	2 - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	10/04/2014	2 - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	16/02/2014	2 S - Singing male - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	24/02/2012	6 S - Singing male - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	16/04/2011	3 - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	18/03/2011	2 - Field Record
Song Thrush	SD920006	Daisy Nook Country Park	23/04/2009	Present Adult; FL - recently Fledged
Spotted Flycatcher	SD917013	Crime Lake & Fairbottom Canal	07/09/2014	2 - Field Record
Spotted Flycatcher	SD917013	Crime Lake & Fairbottom Canal	31/08/2014	1 - Field Record
Spotted Flycatcher	SD917013	Crime Lake & Fairbottom Canal	30/08/2014	3 - Field Record
Spotted Flycatcher	SD920006	Daisy Nook Country Park	05/09/2009	1 - Field Record
Starling	SD917013	Crime Lake Failsworth	12/12/2015	32 - Field Record
Starling	SD920006	Daisy Nook Country Park	23/04/2009	Present FL - recently Fledged young

PHASE 1 HABITAT MAP



Key

-  Continuous Scrub
-  Improved Grassland
-  Swamp
-  Tall, Ruderal Herb
-  Defunct Hedgerow
-  Fence
-  Intact Hedgerow
-  Wall
-  Scattered Scrub

Phase 1 Habitat Map

**Ashton Road, Woodhouses,
Greater Manchester**

NOT TO SCALE



**Drawn by: RF
Date: 05/02/2019**



RACHEL HACKING ECOLOGY

From: Cait O'Dowd - AshtonHale [REDACTED]
Sent: 27 March 2026 14:45
To: SPI Consultations
Cc: Richard Barton - AshtonHale
Subject: Oldham Local Plan: Publication Plan-Grasscroft de Greenfield Ltd
Attachments: Representation re Ashton Road, Oldham GdeG 270326 final.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 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



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



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Oldham Local Plan
Publication Plan Stage Representation Form

Ref:

(For official
use only)

Comments are invited until 11.59pm on Friday 27 March 2026

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

Please return this form by:

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

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

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

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title

First Name

Grasscroft de Greenfield Ltd

Richard

Last Name

Barton

Job Title

(where relevant)

Organisation

(where relevant)

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.

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: Ashton Road, Oldham

These representations have been prepared by AshtonHale on behalf of Grasscroft de Greenfield Ltd (GdeG). The representations relate to Land at Ashton Road, Oldham.

The site is identified at Appendix 1. It is located to the east of Ashton Road and to the south of Bardsley Vale Avenue. The site is accessed from Ashton Road and is currently in agricultural use. The land consists of two fields, separated by a row of trees and is classified as Green Belt.

The land is very well defined, with residential development to the north and mature tree belts defining the eastern and southern boundaries. Beyond these immediate boundaries, there is a plethora of development in the immediate vicinity, including a car wash and a large industrial site (both to the south). Land to the north is an established residential area.

Whilst it is understood that the emerging Local Plan does not seek to allocate additional sites for development beyond those already identified in Places for Everyone (PfE), in the event that this position changes during the examination of the Plan, or should officers determine the allocation of sites to be necessary at this stage, our client would wish to place on record the deliverability of Land off Ashton Road, Oldham, for residential development.

The land has excellent sustainability credentials, being located close to an established bus route and many facilities and services, which are reachable on foot. It would form a logical extension to an established residential area. It is also likely to constitute grey belt.

GdeG would welcome further discussions with officers at the appropriate time to discuss the merits and potential of the site for residential development and would wish to participate in the Examination in Public to promote the site if appropriate.

We trust the above is helpful and we look forward to working with officers to advance the site.

Yours Sincerely,



Richard Barton

Director



AshtonHale Ltd

H. M. LAND REGISTRY

NATIONAL GRID PLAN

SD 9301

OLDHAM

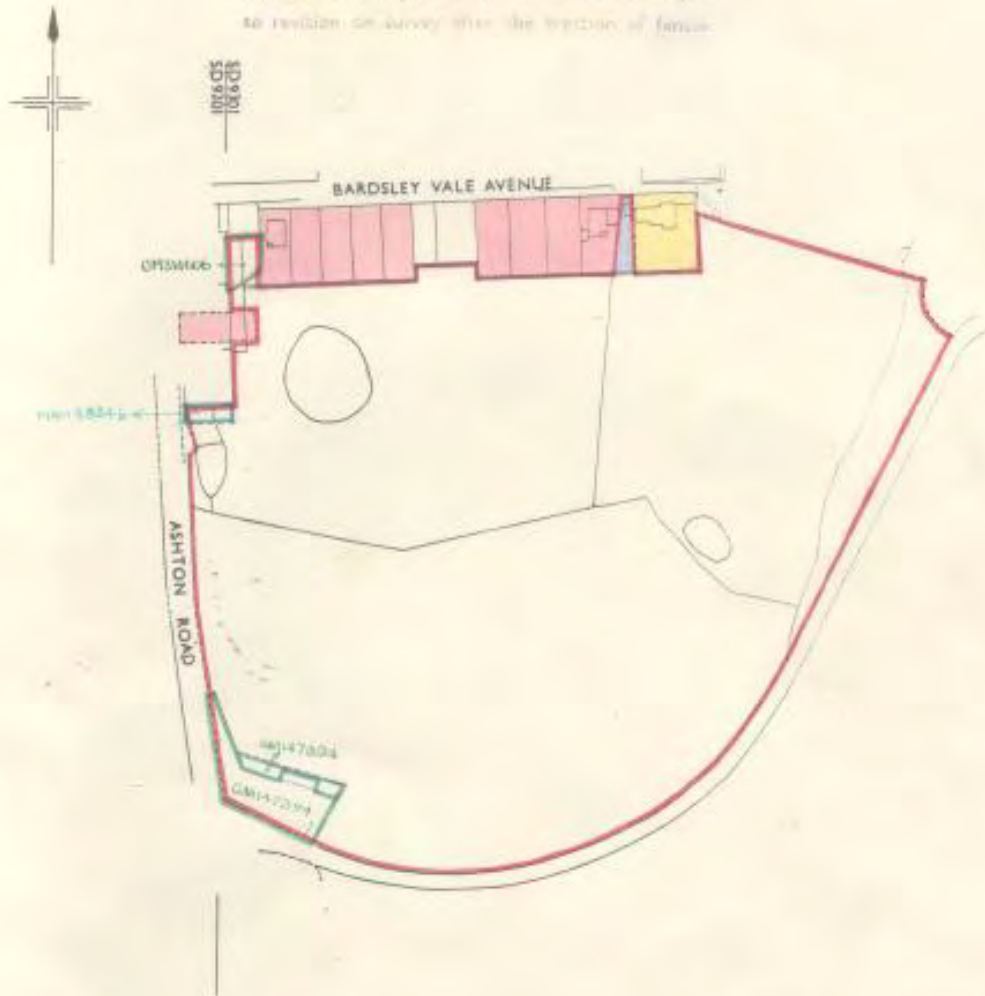
Scale 1/2500

COUNTY OF GREATER MANCHESTER

OLDHAM DISTRICT

~~OLDHAM COUNTY BOROUGH~~

The boundaries shown by dotted lines have been plotted from the plans on file and are subject to revision on survey after the erection of fences.



From: Cait O'Dowd - AshtonHale [REDACTED]
Sent: 27 March 2026 13:47
To: SPI Consultations
Cc: Louisa McCarthy - AshtonHale
Subject: Oldham Local Plan: Publication Plan- Representations on behalf of Prestigious Homes North West
Attachments: Pre-App form Birks Quarry.pdf; Representations to Oldham Council Reg19 Consultation Birks Quarry and Waterworks Rd 270326.pdf

Dear Sir/ Madam,

I am writing to formally submit representations on behalf of Prestigious Homes North West in response to the Oldham Council Local Plan Regulation 19 Consultation.

Please find attached a letter which sets out Prestigious Homes North West's comments relating to this consultation. Prestigious Homes North West 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]
[REDACTED]
A: ABC Buildings, 21-23 Quay Street, Manchester, M3 4AE
O: [Website](#) / [LinkedIn](#)



ashtonhale.co.uk

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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.



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This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title		
First Name		Louisa
Last Name	Prestigious Homes North West	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

On behalf of Prestigious Homes North West

March 2026

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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 Prestigious Homes North West, who have interests in two sites across Oldham:
- Land at Former Birks Quarry, Huddersfield Road. Austerlands
 - Land north of Waterworks Road, Waterhead
- 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 The two 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. In particular, Birks Quarry benefits from an established fallback position, with extant planning permissions confirming the principle of residential development.
- 1.4 The continued designation of these sites as Green Belt is not justified in all cases, particularly where sites 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 Prestigious Homes North West (hereby referred to as “Prestigious Homes”) in response to the Oldham Council Local Plan Regulation 19 Consultation.
- 2.2 These representations are made in relation to Prestigious Homes’ land interests at the below sites:
- Land at Former Birks Quarry, Huddersfield Road, Austerlands
 - Land north of Waterworks Road, Waterhead
- 2.3 Plans showing Prestigious Homes’ land interests are attached at **Appendix I**.
- 2.4 These representations intend to cover the following:
- A background to the Prestigious Homes’ 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;
 - Prestigious Homes’ proposed modifications to the Publication Plan;
 - Prestigious Homes’ intentions for participating at future hearing sessions.

3. Background to Representations

3.1 Prestigious Homes seek to promote two sites for development within the Regulation 19 consultation for residential use across Oldham, these sites are as follows:

- Land at Former Birks Quarry, Huddersfield Road, Austerlands
- Land north of Waterworks Road, Waterhead

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 at Former Birks Quarry, Huddersfield Road, Austerlands

3.3 Birks Quarry comprises a former sandstone quarry site extending to approximately 1.9 hectares on the northern side of the A62 Huddersfield Road. The site is irregular in shape and features sloping topography, rising from the A62 towards the basin of the disused quarry. Despite its historic use, the site is located within a predominantly residential area, with established housing to the east, west and south. Access is taken from Huddersfield Road via a narrow, winding route between steep banks, meaning the quarry is not readily visible from the road.

3.4 The site includes areas of previously quarried land, resulting in steep and vertical rock faces, particularly to the north east. Surrounding areas that have not been quarried retain the original landform and topography.

3.5 The site is bordered by established residential development to the west, south and east, with open meadowland to the north. Austerlands Cricket Club is located to the north east.

3.6 The entirety of the site, with the exception of part of the access road, lies within the designated Green Belt.

3.7 Birks Quarry has been subject to a number of planning applications for residential development in recent years, summarised below.

Outline Planning Permission 1

3.8 On 8th July 2016, outline planning permission ('OPP 1') Ref. PA/337932/15 was granted by Oldham Council for development at the Site of the following description:

"Proposed residential development. Access to be considered. All other matters reserved."

3.9 The proposed development was to be served by a single access point which coincided with the existing access to the quarry from Huddersfield Road. The proposed development at the outline stage for this site consisted of 33 dwellings.

3.10 An application for the approval of Reserved Matters (ref. PA/343610/19, 'RM 1') pursuant to OPP 1 (ref. PA/337932/15) was approved at Committee on 24th July 2023 for development of the following description:

"Application for the approval of Reserved Matters in respect of Appearance, Landscaping, Layout and Scale for the erection of 33 dwellings in relation to outline approval PA/337932/15."

3.11 Having regard to OPP 1, the principle of residential development was considered within the Committee Report as acceptable.

Outline Planning Permission 2

3.12 On 25th September 2018 outline planning permission (Ref. PA/341213/17, 'OPP 2') was granted by Oldham Council for development of the following description:

"Outline planning application for residential development of 4 dwellings. Access to be considered with all other matters reserved."

3.13 The application sought outline permission for four detached dwellings at the site. Access to the site was proposed to be brought about by remodelling and realigning the existing access to the quarry. The site consisted of land on the north and east side of the access road to the quarry and the proposal was put forward as an extension of the indicative scheme approved under Outline Planning Permission 1.

3.14 An application for the approval of Reserved Matters (ref. PA/343609/19, "RM 2") in relation to OPP 2 was approved at Committee on 24th July 2023 for development of the following description:

"Application for the approval of Reserved Matters in respect of Appearance, Landscaping, Layout and Scale for the erection of 4 dwellings in relation to outline approval PA/341213/17."

3.15 The scheme was to be considered in tandem with RM 1 to the north, where the 33 dwellings were proposed. Again, it was considered that following the approval of OPP 2 at the site, the principle of residential development was therefore acceptable.

- 3.16 The principle of residential development at the site as a whole has therefore been established through the recent planning permissions submitted here.

Land North of Waterworks Road

- 3.17 This site extends to approximately 1.7 acres of undeveloped land, bounded by residential development to the east, south and west, within the Moorside area of Oldham.
- 3.18 The site occupies a sustainable location, with good access to public transport and local services. It benefits from connections to Oldham town centre and Manchester via bus and Metrolink. A range of local facilities, including shops, schools and leisure uses within Waterhead, are within walking distance (approximately 1.45km or a 20 minute walk). The site is therefore well positioned to support sustainable residential development and reduce reliance on private car travel.

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 Prestigious Homes' landholdings and representations. Prestigious Homes' 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 Prestigious Homes’ key views and comments on the Publication Plan. Prestigious Homes have not commented 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 Prestigious Homes 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 held by Prestigious Homes 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 at former Birks Quarry, Austerlands

- 5.12 The site benefits from an established fallback position, with extant outline and reserved matters approvals for residential development. The principle of development has therefore already been accepted by the Council, including in the context of Green Belt policy, where very special circumstances were previously found to exist. This fallback position carries significant weight and materially reduces the level of harm that can reasonably be attributed to the proposed development.
- 5.13 The site is available, suitable and achievable, and can be delivered in the short term. This early delivery is particularly important in maintaining a robust housing land supply and avoiding reliance on uncertain or longer-term sites.

Land North of Waterworks Road, Waterhead

- 5.14 The site is effectively contained on three sides by existing residential development, forming a logical infill or rounding off opportunity. The site is located in a highly sustainable location, with excellent access to public transport, local services, schools and facilities within Waterhead and the wider Oldham area. The accessibility of the site supports reduced reliance on private vehicles and aligns with sustainable development objectives.
- 5.15 The site is available and capable of being delivered in the short term, providing an immediate contribution to housing supply. This is particularly important given the increasing housing requirement and the need for deliverable sites.

Housing Densities

- 5.16 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.
- 5.17 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.

- 5.18 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.
- 5.19 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

- 5.20 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%

- 5.21 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.
- 5.22 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.
- 5.23 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

- 5.24 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

- 5.25 In accordance with the Value Area's map found within the Publication Plan, each of Prestigious Homes' 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.
- 5.26 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.
- 5.27 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.
- 5.28 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.
- 5.29 Sites such as Birks Quarry and land north of Waterworks Road represent a logical location for the delivery of affordable housing, which Prestigious Homes is committed to providing within any future residential planning application at the site.

Section 14: Addressing the Biodiversity Emergency

Green Infrastructure Network

- 5.30 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.
- 5.31 **Policy N1** details that designated sites, such as Sites of Biological Importance, will be safeguarded and harm should be avoided.

- 5.32 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.
- 5.33 Prestigious Homes fully support the Council's proposals to increase green links and provide enhanced biodiversity provisions within new developments. Under the current Development Plan, the land north of Waterworks Road adjoins a 'Site of Biological Importance'. 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 each 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

- 5.34 **Policies CC2** and **CC3** detail the Council's approach to development, and the associated impact to increased flood risk and associated drainage. Prestigious Homes 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.
- 5.35 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

- 5.36 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.
- 5.37 Prestigious Homes 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.
- 5.38 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.
- 5.39 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.

- 5.40 Each of the sites promoted by Prestigious Homes meets these criteria and represents 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.
- 5.41 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.
- 5.42 In this regard, sites such as those promoted by Prestigious Homes, 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.
- 5.43 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

- 5.44 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”*.
- 5.45 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.

- 5.46 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

- 5.47 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.
- 5.48 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.
- 5.49 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 Prestigious Homes 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 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 by Prestigious Homes, 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. This is especially relevant in the case of Birks Quarry, where the principle of residential development has already been established through planning permissions. 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 by Prestigious Homes 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 Prestigious Homes for residential development. These sites comprise the former Birks Quarry in Austerlands, and land north of Waterworks Road in Waterhead. 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 Prestigious Homes 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 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 Prestigious Homes 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 4ard 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 by Prestigious Homes. 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: Birks Quarry



DGL Associates Limited THE OLD BARN Heirs House Farm Heirs House Lane Coltve Lancashire BB8 9TA Tel : 01282 945006 Mob : 07976 782876													
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GRASSCROFT DEVELOPMENTS LTD					
Project					
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Drawing Title					
PRE-APPLICATION LOCATION PLAN					
Drawing No.					
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Site Location Plans: Land north of Waterworks Road, Waterhead

AHRRB64 site plan



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From: Cait O'Dowd - AshtonHale [REDACTED]
Sent: 27 March 2026 09:58
To: SPI Consultations
Cc: Richard Barton - AshtonHale
Subject: Oldham Local Plan: Publication Plan- Representations on behalf of Saddleworth Property Partnership
Attachments: FINAL Representations to Oldham Council Reg19 Consultation SBC 270326.pdf;
Representation_Form_Amended_for_extended_consultation_period_FINAL (1).pdf

Dear Sir/ Madam,

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

Please find attached a letter which sets out Saddleworth Property Partnership's comments relating to this consultation. Saddleworth Property Partnership 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](#)



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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)	Saddleworth Property Partnership	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	
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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.



AshtonHale

Representations to Oldham Council's Local Plan Regulation 19 Consultation on behalf of Saddleworth Property Partnership

Saddleworth Business Centre

March 2026

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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 Saddleworth Property Partnership (hereby referred to as "SPP") in respect of land interests at Saddleworth Business Centre, Delph, Oldham ("the Site" or "SBC").
- 1.2 SPP objects to the continued designation of SBC as part of Business and Employment Area BEA21 (Valley Mills) within the Publication Local Plan. The site is no longer suitable, viable or appropriate for employment use, and its retention for such purposes is not justified by the evidence base, nor consistent with national policy.
- 1.3 The site is constrained in operational terms, most notably by access arrangements which are unsuitable for modern commercial or industrial uses, particularly those involving HGV movements. In addition, the site is now isolated from the wider employment area and instead sits within an established residential context. Continued employment use therefore, gives rise to amenity conflicts and does not represent an effective or sustainable use of land. SBC represents a highly sustainable and deliverable opportunity for residential development. The site is previously developed land, located within an accessible location, with strong access to services, facilities and public transport. It is therefore ideally suited to contribute towards the borough's housing needs.
- 1.4 The redevelopment of the site for residential use would deliver clear benefits to the surrounding residential environment. This includes improved highway safety for neighbouring occupiers sharing the site access, and a more compatible relationship with adjacent dwellings, particularly those backing onto the existing mill building, which are currently affected by the impacts of commercial activity.
- 1.5 The Publication Plan's reliance on an outdated housing requirement, derived from the 2021 NPPF and PfE, further reinforces the importance of identifying additional deliverable housing sites.
- 1.6 SPP consider that the Local Plan is not sound in its current form in respect of SBC. The Plan should be modified to remove SBC from BEA21 and support its redevelopment for residential use.

2. Introduction

- 2.1 These representations have been prepared by AshtonHale Ltd on behalf of Saddleworth Property Partnership (hereby referred to as “SPP”) in response to the Oldham Council Local Plan Regulation 19 Consultation.
- 2.2 These representations are made in relation to the SPP’s interest at Saddleworth Business Centre (“SBC”, or “the site”). SBC contains a mix of industrial, warehouse and leisure uses within Delph, Oldham. The site itself comprises a mix of employment uses contained within a former mill building that has been significantly extended, altered and subdivided to form a business centre, together with associated access roads and circulation areas.
- 2.3 A plan showing the SPP’s land interests is attached at Appendix I.
- 2.4 These representations intend to cover the following:
- A background to the SPP’s interests at Saddleworth Business Centre;
 - The case for housing delivery at the Saddleworth Business Centre site in relation to the policies contained within the Publication Plan;
 - Commentary on the soundness of Oldham Council’s Publication Plan;
 - SPP’s proposed modifications to the Publication Plan;
- 2.5 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 Saddleworth Business Centre is entirely under the ownership of Saddleworth Property Partnership, who seek to promote the viable site for alternative residential use.
- 3.2 The Saddleworth Business Centre site is located approximately five miles east of Oldham Town Centre and around nine miles from Junction 20 of the M62 Motorway. It is bounded by Huddersfield Road (A62) to the south and the A6052 to the east within Delph. To the west, the River Tame forms a strong physical and visual boundary between Saddleworth Business Park and the wider Valley Mills employment area beyond. Land to the east of the River Tame is predominantly residential in character, with residential development surrounding the site to the north, east and south.
- 3.3 The eastern and northern boundaries of the site are characterised by existing residential development, including more recent housing at Bakestones Avenue, which was allocated in the adopted Development Plan. Immediately to the north of SBC is a 10 unit residential development constructed on the site of a former office building, which shares access with the business centre (Application Ref: PA/335254/14). Beyond the site's immediate boundaries, development to the north, east and south is predominantly established residential in nature, which serves to further isolate SBC from the Valley Mills employment area and embed it within a residential context.
- 3.4 Access to the site is taken from Huddersfield Road via a shared access arrangement, which also serves the adjoining property to the east and Riverside Court offices to the west. This access is additionally shared with residents of the recently completed residential development located to the rear of the site.
- 3.5 The site extends to approximately 0.87 hectares and comprises previously developed land associated with the operations of Saddleworth Business Centre. SBC contains a mix of industrial, warehouse and leisure uses of varying ages. The site itself comprises a mix of employment uses contained within a former mill building that has been significantly extended, altered and subdivided to form a business centre, together with associated access roads and circulation areas.
- 3.6 A three storey former mill building is located on the site, constructed in solid brick with stone window heads, UPVC windows and a timber-framed, slate-clad roof. The building is arranged

over ground, first and second floors and is now largely used as small business centre style office accommodation.

- 3.7 The central section of the site comprises a mixture of premises with steel trussed roofs, open yard areas used for car parking, and office and storage accommodation at ground and first-floor level. A substantial retaining wall forms the rear boundary of this area and retains land associated with the adjacent residential development.
- 3.8 The most modern section of the site consists of partly steel portal-framed buildings, with open yard areas to the rear and covered car parking provision.
- 3.9 Occupation levels at the site are currently high, however for reasons set out below, the ongoing operation of the site in its current form is not financially viable.

Site Aspirations

- 3.10 SBC forms a part of a proposed Business and Employment Area (Policy E1 that is referred to as Area BEA21 (Valley Mills)) within the Regulation 19 Publication Local Plan document.
- 3.11 Previous representations have been made on behalf of SPP during the Regulation 18 consultation in relation to this site, requesting its removal from the emerging plan as a Business and Employment Area. Within the previous representations submitted to the Council, SPP outlined the poor economic performance and viability challenges of SBC, and to requested that the Council consider de-designating this area of BEA21 for employment uses and consider its allocation for residential development.
- 3.12 Within the Regulation 19 Publication Plan, the site remains designated as a Business and Employment Area.
- 3.13 SPP still aspire to bring the site forward for residential use, and have such submitted a pre-application request to the Council in February 2026 for the potential of the site to deliver c. 31 dwellings with access proposed via the A6052 road.

Key Site Considerations

Highways and Accessibility

- 3.14 The Site, located to the south of Delph Village, has strong connections to local services and facilities. The Site lies adjacent to the A62 (Huddersfield Road), connecting the Site to key locations such as Oldham town centre (c. 15-minute drive), Rochdale (c. 25-minute drive) and Huddersfield (c. 30-minute drive).

- 3.15 Furthermore, the Site is situated in proximity to both north and southbound bus stops along the site boundaries, across The Sound and Huddersfield Road. These are served by the 350, 356, 825, 826, and S350A services, providing access to Oldham, Ashton-under-Lyne and Moorside. Greenfield train station is located c.3km to the south of the Site, providing services to strategic locations such as Manchester Piccadilly, York, and Huddersfield. The no. 350 and 356 bus services stop at Greenfield train station. The typical bus journey time from the Site to the train station using these bus services is c. 12 minutes.
- 3.16 The existing site access has no footways and narrows to approximately 3.5 m at its tightest point. This is not suitable for commercial use and is especially inadequate for HGV access, which requires a minimum width of 6.5 m plus at least one 2 m-wide footway, as set out within the Site representations. While there may be scope to upgrade the access for lower intensity uses, such as residential development, it cannot be feasibly adapted to provide a safe and compliant commercial access.
- 3.17 As a result, the current access is not appropriate for the site's existing employment function and is unlikely to accommodate any intensification or redevelopment of the site for employment purposes. Any future redevelopment of SBC for industrial or commercial purposes would therefore be unacceptable in terms of access and highways requirements and would also lead to significant additional amenity impacts for neighbouring users.
- 3.18 It is also important to recognise that the site access is shared with a recently completed residential development to the north of the site. The continued use of this access to serve employment uses, particularly those generating HGV movements, gives rise to potential conflict with residential traffic, pedestrians and general activity associated with the adjoining dwellings. The redevelopment of the site for residential use would significantly reduce the intensity and nature of vehicle movements associated with the site, removing regular HGV activity.

Heritage

- 3.19 There is no designated heritage assets associated with the site or within the curtilage of the site boundaries. There are a number of Grade II listed buildings within 0.5km of the site, and one Grade II* listed building. The closest heritage assets are located outside the southern boundary of the site, adjacent to Huddersfield Road (A62). These include the Old Bell and Bell House which are Grade II listed brick buildings, and the New Delph Conservation Area which sits at the southern boundary of the site and encompasses the existing access road.

- 3.20 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 New Delph Conservation Area and the adjacent Listed Buildings.

Ecology

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

Flood Risk and Drainage

- 3.22 The Environment Agency Flood Map for Planning indicates the Site to lie predominantly within Flood Zone 2 with isolated areas of surface water flooding in the 1 in 100 year event. A Flood Risk Assessment was carried out at the site in October 2022 including the procurement and review of Environment Agency Flood Risk Assessment Data (formerly known as Product 4 Data) against detailed topographical site survey data.
- 3.23 It is proposed that a similar process will be undertaken at the site with a new Flood Risk Assessment to be produced to support a planning application. It is anticipated that the new Flood Risk Assessment will again involve the procurement and review of Environment Agency Flood Risk Assessment Data, potentially together with Product 5, 6 and 7 data for the relevant stretch of the River Tame, in order to evaluate fluvial flood risk at the site. The assessment of all other forms of flood risk including surface water, groundwater, sewer and reservoir flooding will naturally be included as part of the new Flood Risk Assessment.

Services and Amenity

- 3.24 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:
- Co-op Food, King Street: c. 0.1 mile from the Site
 - Albion Farm Shop & Café: c. 0.9 miles from the Site
 - Tesco Superstore, Chew Valley Road: c. 2.8 miles from the Site
 - Asda Superstore, Greenfield Lane: c. 4.1 miles from the Site
 - Old Bell Inn public house, Delph: c. 0.1 mile from the Site
 - Bulls Head public house, King Street: c. 0.1 mile from the Site
 - Swan Meadow Nursery, Church Street: c. 0.4 miles from the Site
 - Delph Primary School, Denshaw Road: c. 0.5 miles from the Site

- Saddleworth School, Huddersfield Road: c. 1.6 miles from the Site.

3.25 In addition, a number of existing residential properties directly adjoin the site and back onto the existing three storey mill building. The current employment use has the potential to give rise to amenity impacts for these residents, including noise, disturbance, servicing activity, and general comings and goings associated with commercial operations.

3.26 The redevelopment of the site for residential use presents a clear opportunity to improve the relationship between the site and these neighbouring properties. A well designed residential scheme would allow for a more compatible land use, with careful consideration given to layout, separation distances, scale and landscaping.

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 SPP's landholdings and representations. SPP'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 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 SPP's key views and comments on the Publication Plan. SPP have not commented on every policy set out in the document, only those considered particularly relevant to their interests at SBC. The absence of comment to any further policies should not be construed as the SPP 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 Valley Mills (BEA21). 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 Within the Regulation 18 consultation exercise, SPP submitted a robust justification seeking to re-designate SBC from its existing employment use on the grounds that the site can not viably continue to operate in the modern industrial and warehousing industry. It was demonstrated that the site is more suitably redeveloped for residential use. 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 The previous representations submitted at this site included a Market Assessment prepared by Avison Young. This Assessment set out that SBC held an inability to meet the needs of a modern business, which in turn will generate a poor market demand. It was noted that the site was extremely poorly located for its current function and that SBC itself had performed poorly over a significant period of time, in terms of both void accommodation and the ability to achieve a realistic financial return due to substantial continual refurbishment required regarding such items as roof repairs, plant and machinery repairs and improvements required for EPC ratings.
- 5.11 Importantly, SPP have highlighted that the continued inefficient use of the site for employment purposes would have significant effects on the adjacent residential uses, including potential noise and light pollution issues 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 SBC 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 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 SBC 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 SBC 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.

- 5.22 In addition to contributing towards housing supply, the redevelopment of the site would deliver qualitative improvements to the surrounding area. By replacing an incompatible employment use with residential development, the proposal would enhance living conditions for existing residents, particularly those sharing access with the site and those directly adjoining the existing built form.

Housing Densities

- 5.23 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.
- 5.24 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.
- 5.25 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.
- 5.26 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

5.27 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%

5.28 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.*

- 5.29 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.
- 5.30 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

- 5.31 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

- 5.32 In accordance with the Value Area's map found within the Publication Plan, SBC is located within a 'Higher Value Zone' for affordable housing, meaning that 20% of site capacity upon brownfield land should be delivered as affordable housing.
- 5.33 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.

- 5.34 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.
- 5.35 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.
- 5.36 Sites such as Saddleworth Business Centre represent a logical location for the delivery of affordable housing, which SPP is 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

- 5.37 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.
- 5.38 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.

5.39 SPP fully support the Council's proposals to increase green links and provide enhanced biodiversity provisions within new developments. Under the current Development Plan, the SBC site adjoins a 'Green Corridor and Links Network' (Policy 19), which includes the river and the adjacent banks to the west. As part of any future application for development, an ecological assessment will be undertaken to determine how the Green Corridor will be protected and/or enhanced. In addition, the residential development of the site would seek to retain, rehabilitate, and enhance the watercourse corridor where possible which has the potential to provide significant benefits to local habitats and biodiversity.

Section 15: Oldham's Historic Environment

Conservation Areas

5.40 **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 conservation areas and ensure that elements which contribute to a conservation 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. Proposals within a conservation area, or affecting the setting, should:

1. *be of high quality, which respects and reflects the character and appearance of the conservation area and should be of appropriate scale, density, height, form, massing, layout, plot position, materials, colours, composition and detailed design. Imitation of earlier styles is not encouraged;*
2. *retain original building plots, where their relationship with the pattern of development and other plots makes a positive contribution to the character or appearance of the conservation area;*

3. *protect existing street patterns, open spaces, walls, railings, materials and other elements that are an integral part of the conservation area; and*
4. *carefully consider the consequent changes to a use of a building, including amongst others, delivery access, parking, and external services, such as condensing units. Changes that have a detrimental impact on the conservation area will not be permitted.*

- 5.41 There are no designated heritage assets within the SBC site. The nearest heritage assets lie beyond the southern boundary, adjacent to Huddersfield Road (A62). These include the Grade II listed Old Bell and Bell House, as well as the New Delph Conservation Area, which borders the site to the south and includes the existing access road.
- 5.42 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. The removal of commercial activity and its replacement with a high quality residential scheme would also reduce visual and environmental impacts associated with the current use, thereby improving the setting experienced by nearby residents as well as heritage assets.
- 5.43 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. Through sensitive design, development could preserve and enhance the setting of the New Delph Conservation Area and the nearby listed buildings. 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

- 5.44 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”.

- 5.45 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. Particular attention should be given to the interface with Huddersfield Road and the approach to the New Delph Conservation Area, ensuring that development enhances key views and contributes positively to the sense of place.
- 5.46 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

- 5.47 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.
- 5.48 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.
- 5.49 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 SPP 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 SBC 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 SBC.

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 SBC as part of BEA21 is not justified when considered against reasonable alternatives. Evidence submitted by SPP demonstrates that 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 SBC 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 SBC 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 SBC 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 SPP 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 SPP 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 21 Valley Mills from Table E1]...

Policy H1- Delivering a Diverse and Sustainable Housing Offer

- 7.3 SPP 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

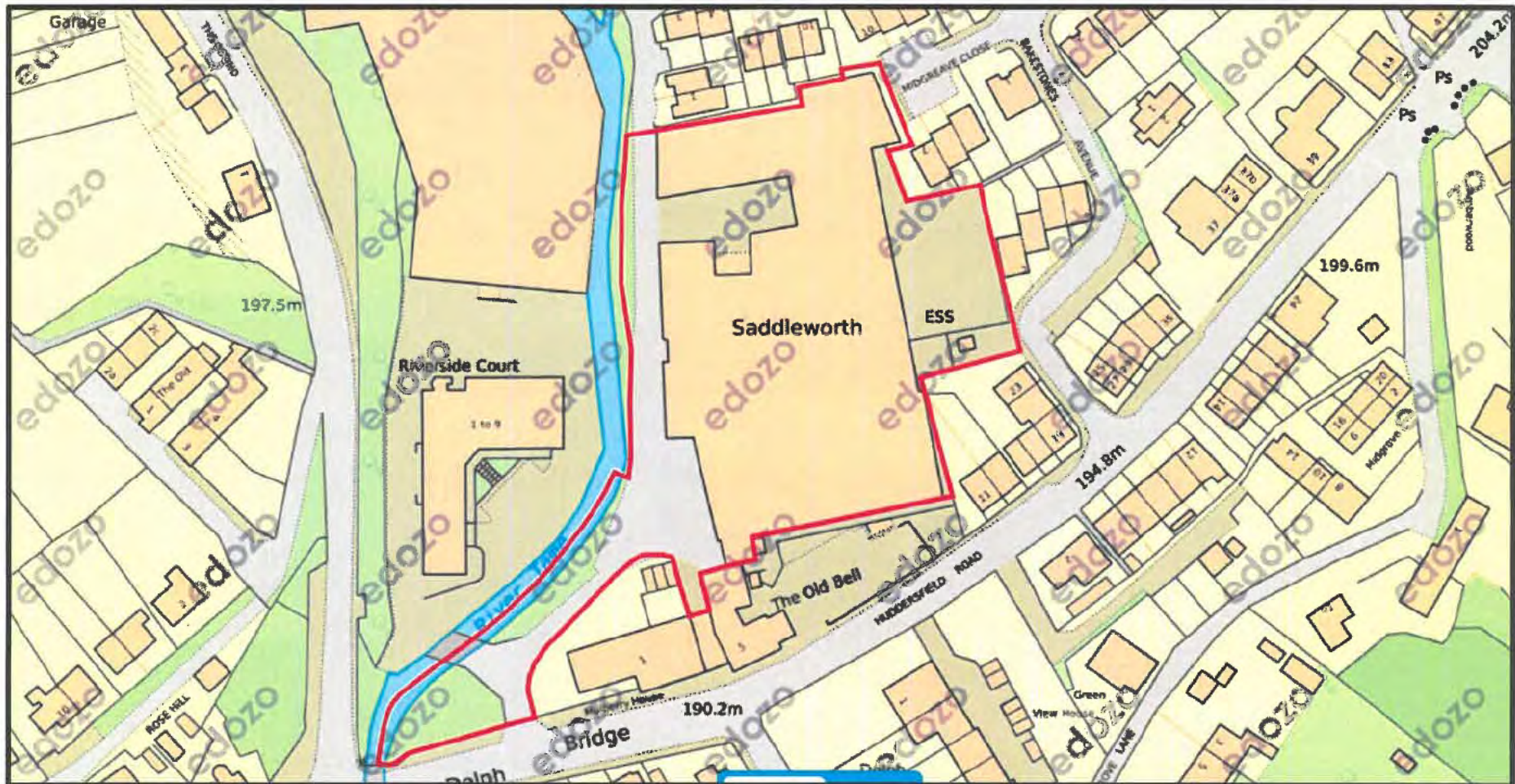
- 8.1 The Consortium confirms that it would wish to take part in any relevant Hearing Session(s) as part of the Local Plan Examination in Public.

9. Conclusion

- 9.1 SPP strongly object to the continued designation of Saddleworth Business Centre as part of Business and Employment Area BEA21 within the Publication Local Plan.
- 9.2 Evidence clearly demonstrates that the site is no longer suitable, viable or appropriate for employment use. Its continued allocation for such purposes is not justified, would not be effective in delivering employment land, and conflicts with national policy objectives to make efficient use of land.
- 9.3 SBC 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 would contribute positively towards meeting housing needs, improving the character of the area, and enhancing the setting of nearby heritage assets.
- 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.

Appendix I

Site Location Plan



From: Michael Parham [REDACTED]
Sent: 27 March 2026 17:46
To: SPI Consultations
Cc: Brian O'Connor
Subject: Oldham Local Plan Representations - Russell LDP [LICH-DMS.FID4033789]
Attachments: Representation_Form_Amended_for_extended_consultation_period_FINAL Russell LDP.pdf; 72151_01 Oldham Local Plan Reg 19 Representations 27.03.26.pdf

Good afternoon,

On behalf of our client Russell LDP, please see the attached representations on the draft Oldham Local Plan Publication Plan and the accompanying consultation form.

Please do not hesitate to get in touch if you have any queries.

Kind regards,

Michael Parham
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[REDACTED]

Lichfields.uk 



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Nathaniel Lichfield & Partners Limited (trading as "Lichfields") is registered in England, no. 2778116, registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.



Oldham Local Plan
Publication Plan Stage Representation Form

Ref:

(For official
use only)

Comments are invited until 11.59pm on Friday 27 March 2026

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

Please return this form by:

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

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

All representations received within the representation period will be submitted electronically to the Secretary of State for consideration by the Planning Inspector(s) as part of the Examination in Public. Comments and names will be published. Full details of how your information will be shared can be found in the Strategic Planning and Information Privacy Notice which can be found on the council's website at https://www.oldham.gov.uk/info/200585/local_plan/1825/consultation.

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title		Mr
First Name		Michael
Last Name		Parham
Job Title (where relevant)		Senior planner
Organisation (where relevant)	Russell LDP	Lichfields
Address Line 1		Ship Canal House, 98 King Street
Line 2		Manchester
Line 3		
Line 4		
Post Code		M2 4WU
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

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

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

Please tick as appropriate

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

See accompanying letter

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

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

See accompanying letter

(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 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.

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

Date: 27 March 2026

Dear Sir / Madam

Oldham Local Plan Publication Regulation 19 Consultation: Representations on behalf of Russell LDP

On behalf of Russell LDP, we are pleased to provide representations to the consultation on Oldham Metropolitan Borough Council's ('the Council') Regulation 19 Local Plan Publication. These representations are submitted to Oldham Council prior to the deadline of 27 March 2026. It is important to state at the outset that Russell LDP welcomes the efforts made by Oldham Council in preparing a new Local Plan for Oldham.

The representations relate to Russell LDP's land interests at Stakehill Industrial Estate, which forms part of the cross-boundary Joint Plan Allocation 2 ('JPA2') in the adopted Places for Everyone Joint Development Plan for Greater Manchester ('Pfe'). The northern extent of the proposed Stakehill Industrial Estate is in Rochdale Council, and the southern portion is within Oldham Council's jurisdiction.

The Regulation 19 Publication Plan follows on from the Draft Local Plan consultation that was carried out in early 2024. Representations on the Oldham Local Plan Regulation 19 Publication are now being invited, with a focus on the legal and procedural requirements and whether the plan meets the four tests of soundness set out in national planning policy, including that it: has been positively prepared; is justified; is effective; and, is consistent with national policy, as per paragraph 36 of the National Planning Policy Framework (NPPF).

During the early preparation of the Plan, the NPPF was updated in December 2024. Where relevant, this update has been taken into account. However, as the Oldham Local Plan contains policies intended to deliver the housing requirement and development growth set out in Pfe, the Plan has been prepared in accordance with the relevant earlier version of the Framework, as set out in paragraph 235 of the NPPF. In this case, this is the 2021 version of the NPPF, under which Pfe was examined, but the Council has also sought to ensure that the Publication Plan aligns with the provisions of the December 2024 NPPF where relevant.

The Government has recently consulted on a draft NPPF, which ran until 10th March 2026. A Written Ministerial Statement (WMS) made on 27th November 2025 highlights the Government's intention to move towards a new plan-making system. The draft NPPF chapter 7 continues to note the importance of the freight, logistics, storage, and distribution sectors – stating that national policy should enable businesses to invest, expand and adapt in a way that reflects the opportunities, challenges and characteristics of different areas, and supports long-term economic growth both locally and nationally.

The key to achieving the Government's economic growth objectives in the short term will be ensuring that existing allocations in key growth industries can come forward without undue delays during the planning process. Development plans providing additional policies must plan positively in order to offer clarity for developers and decision makers, to avoid any unnecessary delays that will stifle economic growth.

Stakehill Allocation (PfE Policy JPA2)

The Stakehill Industrial Estate extension site provides an opportunity for both Oldham and Rochdale to contribute to the future economic growth of Greater Manchester. The allocation of the Site seeks to capitalise on the proximity and connectivity credential of the site. The allocation will provide significant contributions to the employment floorspace within key growth sectors and attract additional investment and economic activity to the area. The allocation will accommodate around 150,000 sqm of new industrial and warehousing development, forming an extension to the existing Stakehill Industrial Estate to the north. On behalf of Russell LDP, Lichfields produced a Delivery Statement to support representations on PfE on the proposed extension to Stakehill Industrial Estate. The Stakehill Industrial Estate is expected bring several significant economic benefits to the local economy including:

- 1 Up to 2,850 full-time jobs which could support up to £100m in wages annually;
- 2 Support an additional 280 full-time jobs indirectly through supply chains and employee spending;
- 3 Generate over £186m gross value added per annum; and,
- 4 Generate £1.8m in business rate revenue per annum.

The Stakehill Industrial Estate Extension forms part of the PfE Allocation JPA2: Stakehill. The strategic allocation includes land to the south of the existing industrial estate, and additional land to the north of the Industrial Estate, between the A627 spur (Slattocks Link) and the M62. Alongside the employment uses, the wider allocation is expected to deliver approximately 1,680 new homes to complement the additional employment opportunities at the Site.

The allocation for JPA2 forms part of the North East Growth Corridor, which stretches across the M62 Corridor from Bury, across Oldham, and on to Rochdale. It is the most significant policy intervention in PfE and seeks to boost the competitiveness the northern districts and stimulate economic growth. The Stakehill Industrial Estate extension will make a significant contribution to these objectives by providing much needed large high-specification employment floorspace to attract employers in high-growth and high value sectors to the region. In turn, these will provide extensive employment opportunities for local people and support the housing growth planned for the area. The construction phase of the Stakehill Industrial Estate Extension will also provide employment opportunities for local people.

JPA2 sets out 16 policy requirements for the development of the allocation, several of these relating to the Stakehill Industrial Estate Extension. Russell LDP collaborated with both Rochdale and Oldham Councils during the preparation of PfE in order to refine the policy requirements of JPA2 to provide clarity for both developers and decision-makers.

It is a statutory requirement that every development plan document must be submitted for independent examination to assess whether it is “sound”, as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF.

There is no statutory definition of ‘soundness’, however, paragraph 35 of the NPPF states that to be considered sound, a Local Plan should be:

- 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.

In addition, the Framework states at paragraph 11 that plans should apply a presumption in favour of sustainable development, including:

“For plan-making this means:

- a *All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

This letter provides detailed representations in relation to the following Local Plan Policies, including an assessment of soundness and a series of recommended changes to each policy in turn:

- Policy E1 – Employment Floorspace Requirements
- Policy E2 – Business and Employment Areas
- Policy CC3 – Sustainable Drainage
- Policy CC4 – Water Efficiency
- Policy N3 – Enhancing Green Infrastructure through Development
- Policy N4 – Trees
- Policy D1 – Achieving High Quality Design
- Policy T1 – Delivering Oldham’s Transport Priorities
- Policy T4 – Electric Vehicle Charging Infrastructure
- Policy IN2 – Planning Obligations

These representations consider each of the above policies in detail and provide recommended amendments to the policies that, in our view, need to be implemented for the Local Plan to be found sound.

Para 2.4 of the Oldham Local Plan sets out that the plan period aligns with that of the PfE to 2039. Whilst it is noted that the PfE plan period does run to 2039, the Inspectors’ Report explicitly states that the constituent authorities will need to extend their plan period beyond this (see PfE paragraph 1.56) and ensure a minimum local plan period of 15 years post adoption. As such, Oldham Council needs to extend the plan period to at least 2042 in light of this or risk being in conflict with the requirements of the PfE. This will also ensure compliance with national policy, namely paragraph 22 of the NPPF.

Policy E1 – Employment Floorspace Requirements

Policy E1 sets out the overall employment floorspace requirements set out in PfE policies JP-J3 and JP-J4. The policy sets out that at least 57,481sqm of office (E(g)(i)) floorspace and at least 240,656sqm of industrial and warehousing (B2 and B8) will be provided in Oldham over the plan period (only to 2039).

Consideration of Policy

Draft Policy E1 (Employment Floorspace Requirements) highlights that the floorspace requirements will be provided in Oldham over the period of 2022-2039. The Inspectors' Examination Report on the PfE Publication Plan (dated 14th February 2024) states the following with regard to the role of PfE and their relationship with local plans. Local plans are expected to allocate sites for industrial, warehouse and office developments, in addition to the employment allocations in the Plan, which look ahead a minimum period from their adoption date.

This is compounded in PfE paragraph 1.56, which states that “**Local plans will be expected to look ahead a minimum period from their adoption, in line with national policy.** *In the event that a local plan looks beyond 2039, the minimum requirement figures set out in Policies JP-J3, JPJ4 and JP-H1 should be used to inform local plan target(s).*” [Lichfields emphasis in bold].

Paragraph 2.20 of the Publication Plan Economy and Employment Topic Paper incorrectly states that Policies JP-J3 and JP-J4 outline the office, industry and warehousing floorspace required over the period 2022-2039. In accordance with the Inspector's comments and paragraph 22 of the NPPF strategic policies are expected to look ahead a minimum period of 15 years from their adoption.

According to Oldham's latest Local Development Scheme (March 2025), the Publication Plan will be submitted for examination in May 2026, with adoption expected in Spring 2027. Therefore, the employment floorspace requirements set out under draft Policy E1 should include employment land provision up to 2042; 15 years on from the expected adoption date. By extending the plan period Oldham will need to identify additional supply of employment land to deliver its development needs for employment space up to 2042.

With the above in mind, it is critically important that PfE allocations, such as the extension to Stakehill Industrial Estate under Policy JPA2, within Oldham are supported and come forward within the plan period so that the need to identify additional land, over and extended plan period, is not exacerbated further.

An updated Draft Employment Land Review has been undertaken and published in January 2024. As part of this Draft Publication Plan consultation, the Council has also published an Economy and Employment Topic Paper, dated January 2026 which sets out that the quantitative floorspace requirements have been established for the period of 2022-2039.

Table 6.1 of PfE has been transposed to paragraph 9.12 of Draft Local Plan Publication. The Paper sets out that Oldham has a supply 81,998 sqm of office floorspace and 278,922 sqm of industrial and warehousing floorspace for the plan period. Oldham's 'requirement' based on a percentage of the PfE supply is identified as 57,481 sqm of office floorspace and 240,656 of industrial and warehousing

floorspace. These figures should be updated to reflect Oldham's employment requirements up to 2042 to ensure they align with the requirements of PfE and national policy.

Tests of Soundness

Russell LDP supports draft Policy E1, but reinforces the need for the tests of soundness to be considered.

- 1 Positively prepared – the requirement for Oldham to provide sufficient employment land should have regard to the need to cover the correct plan period, in accordance with national planning policy. Assuming Oldham's Local Plan will be adopted in 2027, a period of 15 years should provide employment land supply up to 2042, three years beyond the currently prepared employment floorspace provision.
- 2 Consistent with national policy – paragraph 22 of the NPPF requires strategic policies to look ahead 15 years from adoption. To align with the framework, the strategic policies in the plan must cover the period up to 2042 to ensure the Local Plan has sufficient employment space for the requisite period to enable the delivery of sustainable development.

Recommended Changes

The Policy sets out that 57,481sqm of office and at least 240,656sqm of industrial and warehousing space is required to be delivered within the plan period. The plan should be amended to cover a period of at least 15 years from adoption, and therefore the employment space requirements should be recalculated to include at least an additional three years of employment need.

Policy E2 – Business and Employment Areas

Draft Policy E2 sets out the protection and enhancement of Oldham's Business and Employment Areas (BEAs) to support a sustainable local economy. The policy identifies the 23 BEAs, which provide space for existing businesses to expand and for new firms to locate to the borough, supporting job creation. The draft Policy also sets out the permitted uses within BEAs.

Policy Consideration

Oldham has a total industrial and warehousing land supply of 287,922 sqm over the 2022-2039 period. Nearly half of this is made up from PfE allocations (136,720 sqm). Therefore, it is clear that the Stakehill Industrial Estate extension will make a very significant contribution to Oldham's overall industrial and warehousing needs up to 2039. However, despite this, the draft Oldham Local Plan only makes limited references to JPA2 and its important contribution to meeting Oldham's future employment needs.

Given the significance of the Stakehill Industrial Estate extension in meeting the borough's industrial and warehousing needs, we consider that Policy E2 could specifically refer to the PfE allocations including Stakehill Industrial Estate extension site. Table E1 of draft Policy E2 should also be updated to specifically refer to and include the Stakehill Industrial Estate extension, as this will be critical to the delivery of Oldham's employment needs over the period of the plan. Direct policy support for the allocation and development of the Stakehill extension through Local Plan policies will provide additional certainty for applicants and decision makers alike. This will help to ensure the delivery of the Stakehill Industrial Estate extension, and the delivery of the employment floorspace requirements set out in draft Policy E1.

Russell LDP's response to the previous Local Plan consultation highlighted the significance of the Stakehill Industrial Estate extension in meeting the borough's industrial and warehousing need; suggesting the policy should be updated to make explicit reference to it. Oldham Council's response stated:

"This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing, mixed-use and employment development in Oldham. Oldham's employment land supply, along with our designated BEAs, are sufficient to meet our employment need. As such, it is considered that employment allocations are not necessary."

As with the consideration of draft Policy E1, there is concern that there is insufficient employment land to cover Oldham's needs for the requisite plan period, which put the soundness of the plan to question. The strategic policies set out in Oldham's Local Plan should cover 15 years from adoption of the plan. Currently the plan period covers 2022-2039, and according to the Council's Local Development Scheme timetable, the plan is anticipated to be adopted in 2027. In accordance with national policy, the plan period should cover a 15-year period from 2027. Therefore, the delivery of the Stakehill Industrial Estate extension as part of PfE Policy JPA2 is crucial to ensure Oldham's employment needs can be met, as additional space will be needed beyond what has already been planned for.

Tests of Soundness

Russell LDP consider the draft Policy E2 to be reconsidered for the following reasons:

- 1 Positively prepared – the allocations do not include sufficient employment land to meet Oldham’s objectively assessed needs for the requisite period up to 2042. There is a risk that Oldham’s allocation set out in draft Policy E2 will not allow for the sustainable employment growth over the plan period.
- 2 Justified – Any allocation which crosses local authority boundaries should be appropriately managed by all relevant authorities in accordance with NPPF paragraph 27. The Policy has the opportunity to allocate land in order to be consistent with the strategic allocation JPA2 in PfE and deliver sustainable development.

Recommended Changes

The policy should be amended to refer to the Stakehill Allocation JPA2 allocation as meeting part of Oldham’s future needs. This will ensure that Policy E2 is consistent with the strategic aims for the area set out in PfE and provides clarity for developers looking to bring forward development.

Policy CC3 – Sustainable Drainage: Management of Foul and Surface Water

Policy CC3 looks to ensure foul and surface water are managed appropriately and surface water to be discharged in accordance with the hierarchy and to ensure proposals are designed to maximise the retention of surface water on Site and minimise the volume and rate of surface water offsite.

Developments on greenfield sites are also expected to achieve greenfield run-off rates in accordance with non-statutory technical standards for sustainable drainage.

Policy Consideration

Overall, the policy requires holistic, Site-wide drainage foul and surface water strategies for any development which is part of the wider allocation. It is acknowledged that under Criterion 4 of PfE Policy JP-S4 (Flood Risk and the Water Environment) states district local plans should consider setting more detailed surface water drainage policies to reflect local circumstances, such as in areas with critical drainage issues. However, the draft Policy largely duplicates existing national policy and guidance, including the requirements of the National Planning Policy Framework paragraph 181 and footnote 63, as well as the National Standards for Sustainable Drainage Systems (SuDS) PPG (updated July 2025). In doing so, the policy itself fails to introduce any locally-specific requirements or evidence-based justification, and is therefore not consistent with the expectation that Local Plan policies should present an appropriate strategy which is tailored to the circumstances of the local area.

Tests of Soundness

- 1 Justified – The draft Policy repeats well-established PPG and national policy relating to drainage. There is no clear evidence for repeating or restating such policy, and there has been no clear evidence presented which is tailored to the local area to justify the inclusion of the policy, which puts to question whether the policy is justified.

Recommended Changes

Russell LDP recommend that draft Policy CC3 is revisited to avoid duplication of national policy and guidance, including the National Planning Policy Framework and the SuDS PPG. As currently drafted, the policy largely restates existing requirements without introducing locally-specific detail or evidence-based justification. The policy should be reworded to focus on local evidence, and isolated to any identified critical drainage areas, site-specific constraints, or local requirements for surface water management.

Policy CC4 – Water Efficiency

Draft Policy CC4 requires major non-residential development to achieve five credits for category Wat 01 of BREAMM unless this can be demonstrated as impracticable. The policy justification sets out that major non-residential developments are those over 1,000sqm.

In order to demonstrate that BREEAM targets for Wat 01 are being targeted in accordance with the policy, a BREEAM pre-assessment will need to be submitted with planning applications and then compliance would be secured via appropriately worded planning condition.

Policy Consideration

In order to be found sound, draft policies must be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focused specifically on supporting and justifying the policies concerned. A policy requirement for water efficiency, which is an ‘optional’ standard and has not been robustly justified in terms of its consistency with national policy in relation to need or viability.

The Council indicates that evidence has been prepared by United Utilities and is summarised in its Addressing Climate Change Topic Paper. The evidence presented is all in relation to residential development and there is no evidence provided which underpins the non-residential development policy position. The report acknowledges that increased populations are the largest driver of additional water need and consumption in the region.

There is insufficient evidence to justify the requirements on non-residential development within the draft policy (Policy CC4). The viability evidence prepared provides justification for the residential element of the Policy, with water-efficient fittings to target a per capita consumption of 110l/d requiring one-off costs of £9 for a four-bedroom house and research by the Welsh Government indicating potential annual savings for householders of £24 per year as a result of such water efficiency measures. This evidence base was undertaken following devolution of building regulations to the Welsh Government in 2011, with research undertaken by EST to model benefits of greater levels of water efficiency. Therefore, the evidence is in excess of 10 years old and not representative of the viability considerations of water efficiency at the present time. Notwithstanding the outdated evidence base, the evidence provided is irrelevant for non-residential developments and as such it is impossible to determine the impact on the viability of schemes.

Addressing Climate Change Topic Paper acknowledges that Oldham does not fall in an area of water stress, although it points to a 2024 Water Resource Management Plan (WRMP) as evidence that moving to the optional standard is justified. The WRMP identifies that the region is to be a net exporter of water to other regions in the future which should not be the case if the area is lacking in future water supply. Therefore, Russell LDP does not consider that the evidence submitted justifies the policy requirement for non-residential development and its implication on viability has not been taken into account.

Russell LDP support the objective of improving water efficiency of new development, however the policy must provide greater flexibility to ensure applicants are not burdened with onerous policy requirements. This could affect the willingness of applications to come forward, and the deliverability of the Stakehill JPA2 allocation.

Tests of Soundness

- 1 Positively prepared – The Policy potentially places onerous requirements on the Stakehill Industrial Estate extension and could inadvertently preclude the delivery of the JPA2 allocation by placing onerous requirements for non-residential development to achieve high levels of water efficiency.
- 2 Justified – The draft Policy does not take into account appropriate evidence, including viability considerations, for the standards applied to non-residential development.

Recommended Changes

The justification text for the policy should set out the circumstances where the Council will accept that the optional BREEAM standards of 'Excellent' are impracticable. The suggested text should include flexibility for applicants and decision makers to consider Site-specific circumstances, including taking account of the proposed development and the anticipated operations. These factors could hinder the likelihood of achieving compliance with the policy and have implications for the delivery of JPA2.

Policy N3 – Enhancing Green Infrastructure through Development

Draft Policy N3 requires major development for non-residential development over 1,000sqm to use the latest version of the national Urban Greening Factor calculator, to demonstrate that the development will achieve an Urban Greening Factor score, or equivalent, of at least 0.3.

Policy Consideration

While Russell LDP generally support the principle of new development offering improvements to green infrastructure, there is concern that applying a formula to all potential development sites may not be appropriate in all circumstances. This is particularly for employment development, with specific operational requirements such as large building footprints, service yards, HGV circulation and operational parking, which can limit the extent of land available to deliver green infrastructure improvements on site. For employment sites, the inclusion of a small scale of urban infrastructure could have more drastic implications on the layout, particularly with regard to vehicle tracking and logistics. Applying the Urban Greening Factor rigidly could restrict the developable area and constrain the amount of employment floorspace which is delivered. This is particularly important in employment sites where This could work against draft Policy E1, which seeks to deliver 57,481sqm of office and at least 240,656sqm of industrial and warehousing. It has already been noted under the consideration of E1 that the need for employment space is likely to be greater than this when accounting for the correct plan period of 2022-2042, in accordance with national policy.

While the viability assessment for the Local Plan has considered the direct costs of urban greening, it is unclear whether the viability case has accounted for the potential implications of the amount of employment floorspace that can be delivered and the efficiency of Site layouts. It appears as though the Viability Assessment has not considered the resultant costs of achieving Urban Greening Factor 0.3 for employment developments, which should be revisited if the policy is to be found sound. Russell LDP therefore consider that the application of the policy should be done so flexibly for employment development sites in particular.

The supporting text also refers to the provision of tree-lined streets (paragraph 14.53), reflecting paragraph 136 of the National Planning Policy Framework. For consistency with national policy, reference should also be made to footnote 52, which clarifies that tree-lined streets are not required where there are clear, justifiable and compelling reasons why this would be inappropriate. This is particularly relevant in employment areas where road layouts must accommodate servicing requirements, large vehicles and operational access.

Tests of Soundness

- 1 Positively prepared – The fixed requirement for an Urban Greening factor risks constraining development of employment sites and reducing the developable area, especially when considering the land take-up required for HGV circulation, large building footprints, and servicing requirements. Rigid application of such a formula could restrict the delivery of employment floorspace and undermine the delivery of Oldham's economic growth objectives.
- 2 Justified – It is unclear what evidence underpins the need for a specific Urban Greening Factor score and the policy risks imposing requirements which have not been properly assessed from a

viability perspective. In particular, the impacts of the landscaping and planting on Site capacity and floorspace delivered has not been considered in the viability assessment.

- 3 Consistent with national policy - The policy has potential to undermine the delivery of employment development by imposing onerous requirements for green infrastructure through the Urban greening Factor, which is not required under national policy.

Recommended Changes

The Policy should be revisited to ensure that appropriate evidence has been gathered to support the Urban Greening Factor for employment developments. Otherwise, this policy requirement should be removed or an alternative threshold provided which is evidence by a viability assessment.

Policy N4 – Trees

Draft Policy N4 requires that trees and hedgerows are retained wherever possible through careful siting and design. Where tree loss is unavoidable, the number of replacement trees required is determined by the stem diameter of the tree to be removed. This is set out in Table N1, which proposes replacement ratios ranging from 1:2 to 1:9.

Policy Consideration

Russell LDP welcome the objective of replacement tree planting in principle, however the proposed tree replacement ratios could have a significant impact on the developable area of employment sites. The scale of replacement planting required has the potential to materially affect land take within employment allocations, thereby reducing the amount of developable land available for employment floorspace. This in turn could constrain the overall delivery of employment development and undermine the efficient use of allocated sites.

Furthermore, while the costs associated with Policy N4 appear to have been considered within the Local Plan Viability Assessment (LPVA), this assessment only reflects the direct costs of purchasing and planting replacement trees and not for the cost of the ongoing future management and maintenance. It does not appear to account for the consequential impacts on site layout and developable area that may arise from the proposed replacement requirements. These indirect impacts could have significant implications for the viability and deliverability of employment development in the JPA2 allocation.

As currently drafted, the policy therefore risks placing disproportionate constraints on employment sites without sufficient evidence to justify the scale of replacement planting proposed.

Test of Soundness

- 1 Positively prepared – The draft policy risks placing onerous requirements for tree replacements on potential development sites which could increase the land required for landscaping and replacement planting. This could reduce the developable area of sites and be at odds with the efficient use of land and the delivery of employment floorspace required under draft Policy E1. Therefore, the policy does not support the Local Plan's objective for economic growth and meeting the area's objectively assessment employment needs.
- 2 Justified – The policy must be based on a proportionate evidence base. While the viability considers the direct costs of tree replacement it does not consider any associated costs implicated by the Site layouts and the developable land available. Without robust evidence demonstrating that these impacts have been considered, the policy cannot be justified.
- 3 Effective – The policy has potential to undermine the delivery of development by imposing onerous requirements for replacement tree planting and areas required for landscaping. This could impede the delivery of employment sites which are constrained by existing trees and cause delays to the delivery of JPA2.

Recommended Changes

The PfE Policy JP-G7 requires that trees be replaced in a ratio of 2:1. We consider that this is a much more consistent approach, rather than the number of replacement trees being dictated by trunk



diameter. Furthermore, it is not clear why this Local Plan seeks to deviate away from the PfE policy which it needs to align with. Therefore, Table N1 should be removed from the Policy.

Policy D1 – Achieving High Quality Design

The draft Policy requires all development to achieve a high standard of design, consistent with local design guides or design codes, where available. The Policy also sets out various criteria to determine whether development proposals are appropriate, given the surrounding contexts and character.

From the Regulation 18 consultation, the content of draft Policy D2 (A Design-Led Approach to Non-Residential, Commercial and Employment Developments) has been amalgamated in the draft Regulation 19 Policy D1. The Policy states proposals for strategic developments should be supported by a design-led masterplan and, where appropriate, a site-specific design code to show how it achieves the principles above.

Policy Consideration

The policy requirement for local design codes or an overall masterplan should not be placed on the strategic employment allocations which have been released through the PfE. The employment site at Stakehill has been allocated through the PfE to meet strategic large-scale employment needs for the city region and a policy requirement in the Oldham Local Plan should not seek to overly prescriptive on the nature and form of this development, but instead, facilitate the delivery of the allocation.

Unnecessary design requirements on a strategic allocation may compromise the future delivery of the site. The design of buildings as part of delivering the allocation can consider Site-specific mitigation but this should be sufficient for the delivery of appropriate design-related outcomes rather than seeking a requirement for overall masterplans and design codes.

We consider that this element of the policy will inadvertently negatively impact the future development of the Stakehill Industrial Estate extension and the requirement for design codes or overall masterplans for the Stakehill Industrial Estate extension should be removed. PfE notes that the rising levels of automation and digitisation, increased customisation, greater integration of product services, and demands for more functional and energy efficient premises are all leading to the need to increase the supply of new high quality floorspace, often with larger floorplates.

Therefore, the scale and massing of buildings integrated into the allocation should allow for flexibility, depending on the type of industries expected to come forward which cater for businesses' demands and practices.

Tests of Soundness

- 1 Positively prepared – The Policy potentially places onerous design requirements on the Stakehill Industrial Estate extension and could inadvertently preclude the delivery of the JPA2 allocation. Therefore, the policy does not support the Local Plan's objective for economic growth and meeting the area's objectively assessment employment needs.
- 2 Effective – The policy has potential to undermine the delivery of development by imposing onerous design requirements for employment proposals – namely the requirement for design codes or masterplans. This could impede the delivery of employment sites and the delivery of JPA2.

Recommended Changes

The policy should specifically remove the requirement for design codes or overall masterplans for strategic employment allocations. The Policy should be amended to specifically reference the Stakehill Industrial Estate allocation JPA2 as excluded from requiring compliance with design codes or an overall masterplan.

Policy T1 – Delivering Oldham’s Transport Priorities

Draft Policy T1 focuses on improving transport connectivity in Oldham, specifically in key growth areas identified in Places for Everyone. The Policy looks to secure developer contributions as a means of funding transport improvements, including highways, public transport and active travel schemes.

The Policy also sets out that developer contributions will be sought towards the provision or improvement of highway and public transport schemes in accordance with identified council infrastructure priorities.

Policy Consideration

We note that PfE Appendix D sets out the indicative transport mitigation associated with each of the PfE allocations. This includes five ‘necessary’ measures and a further five ‘supporting’ measures for JPA2. The interventions included in PfE Appendix D were informed through the Locality Assessment process and the SRN Future Work Programme Technical Report, in a single strategic ‘worst-case’ scenario. Therefore, the five ‘necessary’ transport interventions for JPA2 are an extensive, evidence based, list of the mitigation required to deliver the allocation. The five ‘supporting’ measures compliment the ‘necessary’ measures and would further improve the accessibility and transport sustainability of the allocation.

Given that extensive work has been undertaken to understand the transport mitigation required for each PfE allocation, the draft policy should be clear that for Strategic allocations where there is already appropriate highways mitigation in place, no additional contributions beyond what is appropriate will not be sought. The policy currently creates uncertainty and introduces the risk that additional, potentially unjustified, transport contributions could be sought through the development management process.

The Viability Assessment considers the delivery of the objectives of draft Policy T1 as having an indirect influence on development viability. It seems the viability assessment has not considered the direct effects of the infrastructure requirements for PfE allocations, such as JPA2, which could affect the likelihood of development coming forward.

While the objective of ensuring adequate infrastructure is supported, the requirement for transport infrastructure to be in place prior to the occupation of development is overly rigid and does not reflect the practical realities of delivering large-scale strategic employment sites. The policy should introduce more flexibility for a phased approach to the delivery of transport infrastructure where this relates to the Stakehill Industrial Estate extension, to allow for the phased delivery of the extension.

In this context, it is important to highlight that financial contributions requested by the Council should meet the tests as set out in Paragraph 58 of the NPPF:

- a necessary to make the development acceptable in planning terms;
- b directly related to the development; and
- c fairly and reasonably related in scale and kind to the development.

The wording of this element of national policy should be specifically referenced in the policy text to ensure that contributions sought on development coming forward in the Stakehill Industrial Estate are necessary, appropriate and proportionate to the scale of development coming forward.

Tests of Soundness

- 1 Effective – the policy provides no reference to strategic allocations in PfE. Therefore, there is no certainty over the level of contributions sought when the development comes forward in phases. The policy does not provide flexibility for phased delivery, which creates uncertainty as to how direct infrastructure cost burdens will be applied to developments and creates uncertainty for developers. This may impact the delivery of the JPA2.
- 2 Justified - The Viability Assessment does not fully account for direct infrastructure costs for PfE allocations, particularly through PfE Appendix D, which identifies ‘necessary’ and ‘supporting’ mitigation for allocations, such as JPA2. There is uncertainty that the policy has considered the viability impacts for strategic PfE allocations in.
- 3 Consistent with national policy – The three tests in relation to planning obligations, as set out in paragraph 58 of the NPPF, are not referenced in the Policy so it is unclear how the required infrastructure requirements will be applied proportionately giving the varying scale of development that is likely to come forward.

Recommendations

Russell LDP request that the Policy be amended to provide specific reference to strategic allocations in the PfE and introduce flexibility for the phased delivery of the JPA2 allocation.

Russell LDP requests that the Policy is updated to make reference to the tests set out in NPPF para 58 and that it is made clear than any financial contributions required by the Council will be considered in this context.

Policy T4 – Electric Vehicle Charging Infrastructure

Policy T4 requires all new development to include electric vehicle (EV) charging infrastructure to support the transition to low-emission transport and support shifts to low-emission private vehicle transport. The policy outlines that non-residential development must provide 10% of parking spaces with active EV charge points, and 20% with passive provision (ducting) for future installation, with flexibility where lower demand can be justified.

Policy Consideration

It is noted that the Viability Assessment (2025) has assumed costs for EV charging facilities of £1,000 per unit house and £2,500 per 4 flats. This has been taken from HM Government (Department for Transport), Electric Vehicle Charging in Residential and Non-Residential Building and is dated July 2019. The Viability Assessment has considered costs for residential developments, but has not considered costs for commercial development. The costs are also taken from data in 2019, and we are aware nationally that the costs of installing EV charging facilities have risen significantly since this time, which also hasn't been accounted for in the assessment. Accounting for the cost of the charging equipment is only part of the picture and any viability assessment should also consider the knock-on consequences of providing more electrical infrastructure at a site. By including additional levels of EV charging, there is likely to be an additional requirement for the provision of onsite electricity substations which are also expensive to deliver. This should be fully factored in for all major developments, not just the cost of the EV charging kit itself.

In addition, the Policy requires a further 20% of spaces shall accommodate appropriate ducting infrastructure to facilitate future provision, the costs of which represent another significant burden for future developers, which has not been considered in the Viability Assessment. It is unclear whether the appropriate viability evidence has been considered for the policies impact on non-residential developments, which puts into question whether the policy is justified.

Tests of soundness

- 1 Justified – The Viability Assessment has not considered the appropriate costs of electric vehicle infrastructure and has therefore not been based on proportionate evidence.

Recommendations

Russell LDP consider that the Policy should be updated to provide proportionate viability justification for the requirement of electric vehicle charging facilities on non-residential development in line with the tests set out in the NPPF. As currently prepared, the Policy has not used up-to-date evidence and it is not clear whether this reflects the true costs for non-residential developments, so this should be revisited.

Policy IN2 – Planning Obligations

Draft Policy IN2 requires planning obligations to be applied where developments would increase the need or demand for infrastructure, services and facilities beyond the capacity of existing provision. This is also to ensure the ongoing maintenance of existing provision.

Policy Consideration

While Russell LDP understand that planning obligations will be necessary to ensure the impacts of development are mitigated for, the policy should include text to confirm that obligations will align with the tests in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 which requires any contributions to be:

- a necessary to make the development acceptable in planning terms;
- b directly related to the development; and
- c fairly and reasonably related in scale and kind to the development.

The Infrastructure and Delivery Topic Paper (January 2026) notes that the Viability Assessment found viability to be difficult in Oldham. This is largely due to high build costs and low sales values across the Borough which also impacts employment development Sites. This has particular implications for employment development and strategic allocations such as JPA2 ‘Stakehill’.

It is acknowledged that PfE already establishes an Infrastructure Delivery Plan for strategic allocations, including Stakehill, and that this provides a mechanism for identifying and coordinating infrastructure requirements. In this context, Policy IN2 should not seek to duplicate or restate these requirements. However, the current drafting of Policy IN2 lacks clarity as to how local infrastructure requirements and planning obligations will be applied alongside the PfE framework. As currently drafted, the policy provides only broad references to securing or enhancing infrastructure, without clearly articulating how contributions will be determined, or how any additional local policy burdens will be balanced against viability considerations.

Any local infrastructure requirements should ensure they align with the existing requirements of PfE and ensure all requirements are properly tested through a viability assessment so that the expected contributions are appropriately evidenced. The Viability Assessment (2025) considers Oldham’s strategic housing allocations, but has not considered the impacts of draft Policy IN2 on strategic non-residential allocations which are allocated through PfE. Therefore, no evidence has been presented to demonstrate that the contributions sought by the policy have been sufficiently evidenced for PfE allocated employment sites, such as JPA2 ‘Stakehill’.

Tests of Soundness

- 1 Justified – The Policy must ensure that developments which involved the delivery of strategic PfE allocations that also require locally-specific contributions have been appropriately tested through a viability assessment. At present, the policy has not been based on proportionate evidence base, and is therefore not justified.

- 2 Consistent with national policy – The policy also provides no alignment with Paragraph 58 of the NPPF in terms of how contributions will be necessary to make the development acceptable in planning terms and appropriately related in terms of scale of the development.

Recommendations

Russell LDP recommends that the three tests in relation to planning obligations, as set out in paragraph 58 of the NPPF, are referenced in the wording of Policy. This will ensure that developer contributions meet the tests set out in the NPPF, and ensure that Policy IN2 is in accordance with national policy.

Policy IN2 should be revisited to ensure that the infrastructure requirements for strategic allocations have been properly tested and evidenced in a viability assessment, alongside any local requirements expected. This will ensure the Policy is appropriately evidenced and justified.

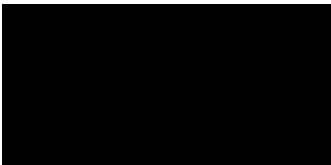
Conclusion

In conclusion, Russell LDP supports the Council's commitment to progressing a new Local Plan and recognises the important role it will play in delivering sustainable growth across Oldham. However, as currently drafted, a number of policies fail to meet the tests of soundness set out in paragraph 35 of the National Planning Policy Framework. In particular, there are concerns regarding whether the policies are sufficiently justified, effective, and consistent with national policy, particularly in their application to strategic allocations such as JPA2 at Stakehill. The absence of sufficient flexibility, clarity, and alignment with the established evidence base, particularly Places for Everyone, risks undermining the timely and viable delivery of the Stakehill Industrial Estate, which will contribute importantly to the employment land supply in the area.

Russell LDP consider the Policies E1, E2, CC3, CC4, N3, N4, D1, T1, T4, and IN2 are considered to be unsound as currently drafted and require some alteration before being able to be made sound. Russell LDP therefore respectfully requests that the Council consider the recommended modifications set out in these representations to ensure that the Plan provides a clear, proportionate, and deliverable framework for development. Subject to these changes, the Local Plan will be better positioned to support economic growth, facilitate investment, and ensure that key strategic sites such as the Stakehill Industrial Estate extension can be brought forward effectively in line with both local and national planning objectives.

We trust that the comments made in relation to the above policies are clear, but should you have any queries, please do not hesitate to contact me.

Yours faithfully


Brian O'Connor

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