

Oldham

Local Plan

**Oldham Local Plan: Publication Plan -
Regulation 19(1) Representations - Part 06 -
Pa to Ta**

August 2026



Oldham
Council

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From: Michael Parham [REDACTED]
Sent: 27 March 2026 14:34
To: SPI Consultations
Cc: Brian O'Connor
Subject: Oldham Local Plan Representations [LICH-DMS.FID4031811]
Attachments: 72098_01 TW Oldham Local Plan Reg 19 Reps v2 27.03.26.pdf;
Representation_Form_Amended_for_extended_consultation_period_FINAL TW.pdf

Good afternoon,

On behalf of Taylor Wimpey UK, 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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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)	Taylor Wimpey UK	Lichfields
Address Line 1		Ship Canal House, 98 King Street, Manchester
Line 2		
Line 3		
Line 4		
Post Code		M2 4WU
Telephone Number		
E-mail Address (where relevant)		[REDACTED]

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:

☒

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

To Whom It May Concern

Oldham Local Plan Publication Regulation 19 Consultation: Representations on behalf of Taylor Wimpey

On behalf of Taylor Wimpey UK Limited [Taylor Wimpey], we are pleased to provide representations to the consultation on Oldham Metropolitan Borough Council's ['the Council'] Regulation 19 Local Plan Publication. The purpose of this Local Plan is to provide the Council with a more detailed set of locally specific planning policies that sit alongside the Places for Everyone Plan [PfE]. The Local Plan should be consistent with the PfE policies, whilst addressing the local, spatial priorities within the Borough. These representations are submitted to Oldham Council prior to the deadline of 27 March 2026.

It is important to state at the outset that Taylor Wimpey welcomes the efforts made by Oldham Council in preparing a new Local Plan for Oldham. 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 35 of the National Planning Policy Framework (NPPF) 2021.

During the early preparation of the Oldham Local 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 retains the Government's commitment towards significantly boosting the supply of homes stating that Council's should identify a sufficient

supply and mix of sites to meet or exceed the housing requirement for the local area. The key to ensuring the Government's targets for housing growth will be ensuring that residential development can come forward in sustainable locations and 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 the delivery of homes.

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 H1 - Delivering a Diverse and Sustainable Housing Offer
- Policy H3 – Housing Mix
- Policy H5 – Affordable Housing

These representations conclude that the above policies do not meet the test of soundness and provides a summary of the changes that, in our view, need to be implemented for the Local Plan to be found sound.

In particular, 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.

Draft Policy H1 – Delivering a Diverse and Sustainable Housing Offer

Draft Policy H1 states “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”. Table H1 below sets out the stepped housing requirement required in Oldham over the plan period identified in the draft Publications Plan.

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

Table H1, Adapted from PfE policy JP-H1 Table 7.2.

Policy Consideration

Draft Policy H1 highlights that the housing 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) clearly sets out the role of PfE and the relationship with local plans. Local plans are expected to allocate sites for residential development, in addition to the strategic allocations in the Plan, looking ahead at least 15 years from the adoption of the plan.

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 2.42 of the Housing Topic Paper, also incorrectly states that Policy JP-H1 of PfE outline the housing requirement over the plan period 2022-2039. In accordance with the Inspector's comments

and paragraph 22 of the NPPF (2021) strategic policies are expected to look ahead a minimum period of 15 years from their adoption not the adoption of the PfE.

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 housing requirement set out under draft Policy H1 should include housing up to 2042; 15 years from the expected adoption date. By extending the plan period, Oldham will need to identify additional land for the delivery of housing in order to deliver its minimum need for new homes up to 2042.

Table 7.2 of PfE has been transposed to Table H1 of the draft Local Plan Publication policy. This sets out a stepped trajectory of 404 homes required annually between 2022-2025, 680 homes for 2025-2030, and 772 homes for 2030-2039. Policy JP-H1 identifies that Oldham's housing land supply for the plan period (2022-2039) is approximately 13,331 homes. However, this figure is based on the Housing Land Supply update for 2022/23. Oldham's Strategic Housing Land Availability Assessment (published December 2025) states that the document identifies land to accommodate 12,364 homes over the plan period and beyond. The SHLAA sets out Oldham's housing land supply (at 1st April 2025). Beyond 2039, the SHLAA identifies the potential to deliver just 354 homes on potential sites and 152 homes forming part of PfE allocations, equating to a total of 506 homes.

In accordance with paragraph 1.56 and footnote 2 of the PfE, in the event a local plan looks beyond 2039, the annual average figure 2022-2039 in Policy JP-H1 Table 7.2 should be treated as a minimum requirement for each year after 2039. To inform the minimum local plan requirements for the unaccounted period of 2039-2042 of Oldham's 15-year period, PfE states that the annualised figure of 680 homes should be used. However, it should be stressed that this is a minimum. Although the SHLAA and the draft Local Plan identify land for a total of 506 homes beyond 2039, this is substantially less than the minimum requirement of 680 homes per year which would equate to a total of 2,040 homes required for the years 2039-2042.

Whilst the approach taken to utilise the average figure for Oldham's housing requirement within PfE is consistent with the Inspectors' recommendation from the examination, this also should be considered in the context of Oldham's recently increased Local Housing Need [LHN] calculated using the Government's Standard Method (SM3). From 22nd March 2029 onwards (when the PfE will be five years from adoption and therefore out of date), the LHN will apply and the housing requirement for Oldham will increase significantly overnight.

It will be highly likely at this stage that the Council will struggle to identify a sufficient supply of land and will be unable to demonstrate a Five-Year Housing Land Supply from 2029 onwards therefore being susceptible to speculative applications for development. As such, Oldham must take positive steps now towards meeting a significantly increased housing requirement from March 2029 onwards.

It is therefore imperative that the Council put steps in place now to ensure plan led development rather than being subjected to speculative applications in 2029 when the higher housing requirement becomes mandatory. Waiting until 2029 to proactively identify land to meet this higher housing requirement will be too late, and the Council should plan through the emerging Oldham Local Plan to address this. On this basis, it would be more appropriate for Oldham to futureproof their plan by identifying additional supply now as a safeguard rather than planning for the minimum amount of growth in the short term. The Council should therefore review its housing land supply in this context. This approach

would not require the housing requirement to be uplifted and be inconsistent with the requirement in the PfE, but would allow greater flexibility in the Plan.

Furthermore, it is highly unlikely that Oldham would be able to redistribute any of its housing requirement across other Greater Manchester Borough's through a potential review of the PfE in 2029, as the LHN for all other Borough's has significantly increased based on SM3. It is therefore highly likely that Oldham will be required to meet its LHN in full, placing further pressure on the requirement to identify additional housing land.

Given the change in circumstances since the adoption of the PfE, namely with the introduction of the new Standard Method (SM3), Taylor Wimpey consider that it would be more appropriate to use the most recent local housing need across the extended plan period. This will ensure the Policy is positively prepared and consistent with national policy. On 27th March 2026 new affordability ratios were published, which showed Oldham's Local Housing Need Figure increased to 967 homes. Taylor Wimpey recommend that this figure is used to support plan-led growth. Oldham therefore has an annualised requirement of 967 homes which equates to a total additional requirement of 2,901 homes to account for the plan period up to 2042. Therefore, draft Policy H1 must be revisited to find additional sites to support the delivery of an additional 2,395 homes.

Allocations

It is noted that draft Policy H1 does not provide any housing allocations. Paragraph 2.4 of the draft stating the following:

"The Oldham Local Plan has been aligned with the plan period of PfE – up to 2039, given that it is supporting delivery of the Joint Plan. In addition, as this Local Plan focuses on non-strategic planning policies that deal with primarily development management matters, it does not include allocations for future development, whether that be for new homes or employment."

Taylor Wimpey accepts the distinction between the allocations in the PfE and the abstention of allocations in the Oldham Local Plan, however, this should not preclude the Local Plan from allocating additional housing sites if they are required. As the Local plan should provide a more specific local outlook for the development of Oldham, this represents a missed opportunity to allocate deliverable and developable sites in accordance with paragraph 68 of the NPPF (2021). This would assist in clearly demonstrating the land supply over the requisite plan period and provide certainty for prospective developers looking to deliver new homes. As already discussed, draft Policy H1 has a shortfall of approximately 2,395 homes as currently written. There is therefore a clear need to allocate sites in the plan to make it sound and meet the tests of soundness. This would ensure that the Policy is positively prepared and identified sufficient land in order to be effective in meeting Oldham's development needs so that development is appropriately plan-led. If the Council does not identify and allocate sufficient sites to meet its identified needs, it risks being found unsound at Examination.

It is also worth noting that in the event that Oldham cannot demonstrate a sufficient supply of housing land, there is a real risk of speculative planning applications being submitted running a grey belt case. The opportunity to resist this and plan positively is via this Local Plan and failing to do so is a real missed opportunity.

Sustainability

Draft Policy H1 also sets out that the Council will support residential development in sustainable and accessible locations, that promote and encourage the use of public transport. The Policy sets out that development should encourage walking, cycling, and wheeling and all residential development should achieve a Greater Manchester Accessibility Level (GMAL) score of 4 or above. While Taylor Wimpey supports the principle that new residential development should be situated in accessible locations, the GMAL score should not be used as a strict tool for assessing the accessibility of development sites upon which decision-makers consider a proposal as a pass or fail.

The GMAL is a supplementary tool for assessing the current accessibility of sites, but does not consider the future infrastructure improvements which could potentially improve the sustainability of sites. In addition, it does not consider high-quality walking and cycling routes, along which people may be willing to travel extended distances as a result of the routes quality and recreational value. Taylor Wimpey considers that draft Policy H1's reference to residential developments being in sustainable and accessible locations should be amended to provide flexibility and ensure that the delivery of residential development in the Borough is supported.

Tests of Soundness

Taylor Wimpey supports draft Policy H1, but the matters outlined above require further consideration of the tests of soundness in order to be found sound.

- 1 Positively prepared – The requirement for Oldham to provide sufficient homes to support the anticipated growth of the Borough 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 accordance with the Local Development Scheme in 2027, a period of 15 years should be considered to provide the required homes up to 2042. Therefore, the policy has not been positively prepared and should be revisited to identify sufficient land to deliver for a further three years beyond the current plan period.

The reference to GMAL in draft Policy H1 only reflects current accessibility and overlooks future infrastructure improvements which could be delivered through development. The Policy also does not consider the quality of walking and cycling routes. Therefore, the Policy could be revisited to include site-specific assessments, so that sustainability is judged more accurately and more positively supports housing delivery.

- 2 Justified – The SHLAA which was published in December 2025 forms a critical part of the evidence base for draft Policy H1. The SHLAA identifies sites up to a base date of 1st April 2025 and includes land that can support the delivery of 506 homes beyond 2039. However, the SHLAA has not accounted for the additional 2,395 homes required up to 2042 and therefore the evidence base for policy H1 should be revisited to the policy is robustly justified.
- 3 Effective – As currently written, draft policy H1 does not account for the correct plan period as explicitly required in accordance with national policy and the PfE. The result of the current policy wording is that insufficient land has been identified to support Oldham's anticipated housing need up to 2042. Therefore, the Policy will not deliver the required homes over the requisite plan period and will not be effective in supporting the Borough's growth.

In relation to GMAL scores and sustainably located housing sites, the policy does not provide flexibility or consideration of improved infrastructure and accessibility of sites. This in turn may limit the number of residential sites which are considered sustainable and come forward, altogether impacting the effective delivery of housing in Oldham.

- 4 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 supply of housing land for the requisite period to enable the delivery of sustainable development.

Recommended Changes

The Policy sets out the requirements for residential development in Table H1, which are required to be delivered within the plan period (up to 2039). The evidence base for Policy H1, in particular the SHLAA published in December 2025, should be revisited to ensure that the correct plan period has been considered to include at least an additional three years of housing need. The recalculated housing need should also consider the SM3 figure of 967 homes for the years 2039-2042. Taylor Wimpey recommends that the SHLAA is reassessed to identify land to support the delivery of an additional 2,395 homes.

Given the identified shortfalls of draft Policy H1, there is a clear need to identify additional land to meet Oldham's housing needs. Taylor Wimpey recommends that the SHLAA and Brownfield Register is revisited so that the plan is based on robust evidence and aligns with the provisions of national policy and PFE. Taylor Wimpey considers that the SHLAA and Brownfield Register should act as a starting point for considering the allocation of sites in the Local Plan so that Oldham Council can meet its minimum housing requirements across the plan period.

In relation to the sustainable location of sites and the GMAL score of sites, Taylor Wimpey recommend that the Policy is reworded to take into account further level of Site-specific analysis. This would allow for the consideration of Site sustainability to reflect the quality of active travel routes as well as the potential improvements to transport infrastructure which could be delivered in the area. This would provide a more accurate reflection of the opportunities for residential development to be sustainably located and ensure the Policy is positively prepared and effective.

Draft Policy H3 – Housing mix

Draft policy H3 requires new developments to contribute towards the delivery of diverse, mixed communities across the Borough. The reasoned justification for draft Policy H3 sets out expected requirements in relation to mix of market and affordable homes, tenures and house type, to ensure that housing developments contribute towards meeting Oldham's housing needs.

Policy Consideration

Taylor Wimpey is generally supportive of the need for a mix of house types on residential developments. To support Policy H3, Oldham Council has provided justification evidenced in the Local Housing Needs Assessment (LHNA) dated 2024. Table H3 of the reasoned justification has been transposed from Table 5.1 of the LHNA and provides prescriptive break-down of Oldham's housing needs. With

consideration to the mix and market ranges provided in Table H3, Taylor Wimpey has some concern with the ranges provided and considers that additional flexibility should be provided within the policy to allow Site-specific considerations to be taken into account. Table H3 provides narrow ranges for the percentage of each house type/size, with only a 5% leeway, which is an unrealistic range that will be inappropriate for all sites in the Borough.

The draft Policy sets out specific circumstances where an alternative housing mix may be appropriate. This includes in circumstances where it can be evidenced that alternative provision is needed in relation to specific funding requirements, if the Site has distinct characteristics that make an identified housing mix 'inappropriate or impracticable', or if the proposal is for specialist accommodation. Criterion 2 of draft Policy H3 – site-specific characteristics that make the housing mix inappropriate – sets out the examples of Site-specific considerations that will be accepted by the council, including include flood risk, design context, impact on heritage assets. Rather than applying a very prescriptive approach to housing mix, the policy should allow for greater flexibility to ensure it is effective and positively prepared. It is also worth bearing in mind that there will be a large number of sites that come forward in an authority area which are small or will deliver a large number of smaller units, particularly urban sites. Therefore, applying limited flexibility on housing mix to larger greenfield sites will simply result in a disproportionate number of smaller units being delivered across an authority area which is below the needs identified in the LHNA overall.

Tests of Soundness

- 1 Positively prepared – The Policy applies rigid requirements for the proposed housing mix of residential developments which could restrict the delivery of residential sites in Oldham and could undermine the delivery of Oldham's housing requirements.
- 2 Effective – The application of rigid housing mix requirements in the policy risks creating an overly rigid approach to residential development which could deter developers looking at potential Site's in the Borough. This may undermine the delivery of housing in Oldham and stifle the Council's ability to meet its housing needs over the plan period (set out in Policy H1).

Recommendations

Taylor Wimpey recommend that a more flexible approach is adopted to alternative housing mix which recognises the varying needs and demands from different areas across the Borough. Providing greater flexibility will ensure that the plan is positively prepared and effective. In particular, Taylor Wimpey recommend that the mix and ranges set out in the reasoned justification for the policy are broadened to ensure there is further flexibility for residential developers considering prospective Sites in Oldham.

Policy H5 – Affordable Housing

Draft Policy H5 sets out the requirements for affordable housing in Oldham, and requires all developments of 10 dwellings or more to deliver an appropriate level of affordable housing. The amount of affordable housing to be provided is set out in Table H4, with a distinction between High Value and Medium/Low Value areas and whether a site is brownfield or greenfield

Policy Consideration

The Local Housing Needs Survey (2024) identifies an affordable housing need of 669dpa (paragraph 5.4) which is just short of the overall housing requirement stated in Policy H1 of the Local Plan (680dpa). The evidence base for the Policy therefore indicates that the number of affordable homes expected to be delivered in the Local Plan are capped due to the viability constraints of the Borough (permitted under paragraph 34 of the NPPF). The Housing Needs of Different Groups PPG outlines that an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes (Reference ID: 67-008-20190722). This supports Taylor Wimpey's stance that the housing need outlined in H1 should be reconsidered.

In addition, the Viability Assessment for the Local Plan sets out the viability challenges for Medium and Lower Value areas in paragraphs 9.9 – 9.11, which states the following:

“9.9 For the brownfield typologies, viability is particularly challenging. The lower and medium value zones all indicate that no affordable housing could be afforded and the schemes are all unviable. S106 costs were also tested within the sensitivity analysis and demonstrate a lack of viability where affordable housing is provided. Due to how unviable these typologies are, the council could set 0% affordable housing within the lower and medium value zones.

9.10 The high value zone (brownfield) sensitivity analysis demonstrates that 20% affordable housing can be afforded alongside S106 costs (excluding the higher density scheme at 100 units). The council could adopt an approach of including a higher target (than the other value zones) within the higher value zone on brownfield land. If a single target is set, we would expect the high value zones to be able to afford a 20% target, alongside S106 in most cases.”

Given the above, Taylor Wimpey consider that the evidence base does not justify the 10% affordable housing requirement in Medium and Lower Value Areas. In High Value areas, developments over 100 dwellings are also considered to be unviable on both greenfield and brownfield land, as set out in Tables 8.4 and 8.7 of the Viability Assessment. This would also indicate that the policy requirement for High Value areas is unjustified.

Policy H5 does not set out an option for applicants to negotiate affordable housing requirements in situations where it is unviable to provide the affordable housing requirements set out in the Policy.

Tests of Soundness

- 1 Justified – The evidence base for Polic H5, namely the Viability Assessment identifies difficulties with viability in Oldham across Medium and Lower Value areas and for sites in High Value areas above 100 dwellings. Therefore, the policy requirement is not based on robust and appropriate evidence and is not justified.
- 2 Effective – The Viability Assessment considers that various scenarios are unviable, but provides no means for applicants to negotiate the affordable housing requirements. The policy also provides limited flexibility to take Site-specific circumstances into account, which is likely to stifle the delivery of homes in Oldham and render the policy ineffective.

Recommendations

The Council should use other available mechanisms, such as increasing the housing land supply (as suggested under Policy H1) to improve the delivery of affordable housing across the plan period. In addition, Taylor Wimpey considers that there should be a degree in flexibility in the precise split in affordable tenures and opportunity to negotiate on the affordable housing requirements required. Allowing applicants to take into account site specific viability considerations together with the increase in housing land supply will support the delivery of more affordable homes in Oldham across the plan period.

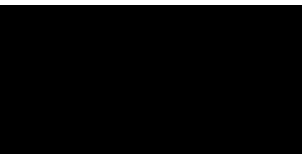
Conclusions

In conclusion, Taylor Wimpey 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.

Taylor Wimpey considers that Policies H1, H3, and H5 are unsound as currently drafted and require some alteration before being able to be made sound. Taylor Wimpey 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 the delivery of homes in Oldham 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

Senior Director

BA (Hons) MPlan MAEIAM MRTPI

Publication Local Plan Consultation 2026 – Representations for Mr J Jaskolka - Land to the rear of, 748 Ripponden Road, Grains Bar, Oldham, OL4 2LP

From Gareth Salthouse [REDACTED]
Date Mon 23/03/2026 11:22
To SPI Consultations <SPI.Consultations@oldham.gov.uk>

2 attachments (7 MB)

Reps and appendices Oldham LP Publication Mr J Jaskolka March 2026.pdf; Representation Form Mr J Jaskolka Publication Version Local Plan.pdf;

Dear Sir/Madam

Please find attached representations on behalf of Mr Joe Jaskolka. Our representations are attached and also a completed form.

I would be grateful if you would confirm safe receipt.

Many thanks
Gareth

Gareth Salthouse BA (Hons), MPlan, MRTPI

DIRECTOR

[Emery Planning 2026 Brochure](#)



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Oldham Local Plan
Publication Plan Stage Representation Form

Ref:

(For official
use only)

Comments are invited until **11.59pm on Friday 27 March 2026**

CONSULTATION PERIOD EXTENDED TO FRIDAY 27 MARCH 2026

Please return this form by:

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

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

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

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	Mr	Mr
First Name	Joe	Gareth
Last Name	Jaskolka	Salthouse
Job Title (where relevant)		Director
Organisation (where relevant)		Emery Planning
Address Line 1	C/O Agent	1-4 South Park Business Court
Line 2		Hobson Street
Line 3		Macclesfield
Line 4		
Post Code		SK11 8BS
Telephone Number		
E-mail Address (where relevant)		support@emeryplanning.com

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph		Policy	H1, H5, OL2, Plan- Period.	Policies Map	Green Belt boundaries
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4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

Please see enclosed representations.

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

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

Please see enclosed representations. This includes suggested permissive 'exceptions' policy for edge-of-settlement affordable housing.

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

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

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

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

☐

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

☒

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

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

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

To orally participate given the complexity of the issues.

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

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

X
X
X

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

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

The Adoption of the Oldham Local Plan.

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

23 March 2026

Dear Sir/Madam

Re: Publication Local Plan Consultation 2026 – Representations for Mr J Jaskolka - Land to the rear of, 748 Ripponden Road, Grains Bar, Oldham, OL4 2LP

We are instructed by our client, Mr J Jaskolka, to submit representations to the Oldham Publication Local Plan 2026 consultation.

Our client's site is at **Appendix EP1** of this letter.



Our client's site at Alderney Farm formed part of a draft housing allocation (GM20) through the Greater Manchester Spatial Framework 2019 (GMSF). It was identified as such because the land does not make a meaningful contribution towards the purposes of including land in the Green Belt. The wider draft site allocation

is at **Appendix EP2**. We have again put the site forward through the emerging local plan as an omission site in order to help meet unmet housing needs.

Notwithstanding identified housing needs, the Green Belt boundary in this location is anomalous in any event. The Local Plan Inspector for the Oldham UDP examination in 2005 recommended that our client's land should be released from the Green Belt in order to provide a more logical and defensible boundary. Although this recommendation was not carried forward to the final adopted UDP at the time, the emerging local plan now presents opportunity to amend the Green Belt boundary as recommended by the Local Plan Inspector over 20 years ago.

Plan-period

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

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

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

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

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

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

Policy H1

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

The Government is very clear that we are in the midst of the most acute housing crisis in living memory with home ownership out of reach for too many, the shortage of houses driving high rents and too many left without access to a safe and secure home. The message is unmistakable that a radical and significant boost in housebuilding is necessary. Access to a safe and secure home is critical to life chances for all ages and this includes people being able to get and keep a job, health and wellbeing and children having the best prospects of staying in education. The Government's target of 1.5 million new homes over this Parliament will only be met if the standard method for each authority is seen as a minimum and there is a step-change in facilitating development proposals in a timely manner.

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

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

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

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

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

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

Policy H5

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

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

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

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

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

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

Exception policy

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

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

“1. Development proposals for housing or traveller sites on land not already allocated for this purpose, and which are located outside settlements, should be supported where they are:

a. A rural exception site (as defined in the glossary of this Framework) that will provide affordable housing or affordable traveller sites to meet identified local needs – as evidenced through a local housing needs survey or secondary data which is no more than five years old; or

b. Sites which comprise community-led development which would not qualify as a rural exception site, but which include one or more types of affordable housing as defined in the glossary of this Framework.

2. Unless otherwise specified in the development plan, exception sites brought forward in one of these two ways should:

a. Adjoin or be physically well-related to settlements;

b. Be no larger than 1 hectare in size, or exceed 5% of the size of the existing settlement; and

c. Comprise a majority of affordable housing or affordable traveller pitches. A proportion of market homes may be allowed on the site where essential to enable the delivery of affordable units without grant funding.”

Policy OL2

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

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

As discussed further below, the Local Plan Inspector for the 2005 Oldham UDP recommended that part of our client's site be released from the Green Belt notwithstanding development requirements. This was to provide a more logical and defensible boundary to the built-up area. It is not clear why this recommendation made over 20 years ago has not been responded to through the emerging local plan and Appendix 8 of the Publication Local Plan.

Land at Alderney Farm, Ripponden Road, Oldham

Minor change to the Green Belt boundaries

As noted earlier, the Local Plan Inspector's Report for the Oldham Unitary Development Plan (UDP) in 2005 recommended that client's site be removed from the Green Belt boundaries notwithstanding housing needs:

"As far as the smaller area of land is concerned (Mr Sykes objection – the field between the houses at the head of the cul-de-sac, known as Peak Close and the buildings associated with Sholver Moor Farm), whilst it makes some contribution to the openness of the Green Belt, I consider that this is limited. This is due to its location between the housing development to the south and the development to the north. The land immediately behind the Waggon and Horses is a domestic garden with a substantial Leylandii hedge along its eastern boundary. Sholver Moor Farm includes residential buildings, domestic garden and green houses. In other words, this group of buildings and gardens as a whole differs markedly in character from the surrounding open countryside. Consequently, it seems to me that the boundary of the designated area in this locality is illogical and I consider that this justifies some modification. I consider that the smaller part of Mr Sykes' objection site, the areas which includes the buildings of Sholver Moor Farm and the domestic curtilages at Alderney Farm, together with the Waggon and Horses and garden to the rear, should be removed from the Green Belt. This would give a clearly defensible boundary between the two areas discussed above. Whilst I have concluded that the overall housing strategy is satisfactory, the allocation of the smaller part of the objection site would, along with the other minor additions I have recommended, provide flexibility but would not prejudice the overall allocations and future decisions."

Although the Local Plan Inspector, Mr Richard Mordey, recommended the release of the land in question from the Green Belt, the Council at the time rejected this recommendation for the following reason:

"The Council considers that significant changes to the Green Belt boundaries and subsequent allocations of land for other uses should be undertaken in a strategic review

of the Green Belt at a future time, when all areas can be considered together and their Green Belt function assessed together with their merit (if any) for development purposes. The Council also considers that there is no compelling reason for change. It is not inappropriate for housing and farm uses to be located in the Green Belt; in fact PPG2 states that such uses are acceptable Green Belt uses. Notwithstanding these issues of principle, the site has also been assessed by the Council's transport section and they indicate that due to access constraints, only 3-4 dwellings would be suitable. Given that this would only be a small addition to the Council's housing numbers, it is not considered necessary to make the recommended change to contribute to the housing land supply."

The above reason is no longer relevant. The Council is seeking to make minor changes to the Green Belt boundaries through the emerging local plan. This is the time to carry out the recommendations of the Local Plan Inspector over 20 years in removing part of our client's site from the Green Belt to provide a more logical and defensible boundary for the built-up area.

Since the time of the Local Plan Inspector's recommendation over 20 years, our client's land has become only more domesticated in character through the issue of the positive certificate of lawfulness in 2016 (PINS ref: APP/W4223/X/16/3143392 and LPA ref: CL/336820/15 – see **Appendix EP3** of this Statement).

Site location and description

The site is located to the northern edge of the built-up area of Moorside, which is a predominantly residential area to the north-east of Oldham town centre. The site falls within the boundaries of the designated Green Belt, although it abuts the identified settlement boundaries.

Our client's site has been promoted for residential development for well over 20 years through various iterations of the local plan for Oldham. As discussed the Local Plan Inspector for the Inquiry into the Oldham Unitary Development Plan (UDP) in 2005 recommended that the site should be removed from the Green Belt notwithstanding housing needs given that the land in question was considered to not fulfil a meaningful Green Belt function.

Our client's site comprises a two-storey residential property and outbuilding, alongside a large domestic garden in the form of lawn and flower/vegetable beds, associated with no. 748 Ripponden Road within the western part of the site and agricultural land within the eastern part of the site. There is an established access leading to no. 748 off Ripponden Road, which is a principal traffic route between Oldham and Grains Bar. The large residential garden land within the western part of the site was the subject of a positive certificate of lawfulness for this use issued in 2016 by the Planning Inspectorate (PINS ref: APP/W4223/X/16/3143392 and LPA ref: CL/336820/15). The decision notice and location plan for this positive certificate of lawfulness are appended at **Appendix EP3** of this letter.

The site is bounded by: a former quarry, known as Besom Hill, to the north and east that has been colonised by some woodland; other residential buildings and Ripponden Road beyond to the western and south-western boundaries; and the farm complex at Sholver Moor Farm and an agricultural field beyond to the southern boundary. Land to the immediate western boundary was subject to the grant of planning permission for 4 new houses in 2017 and this development has now been constructed, thereby further urbanising our client's site (LPA ref: PA/338842/16).

The site is within easy walking distance of a wide range of local services and public transport options as discussed through this Statement.

Green Belt considerations

Our client's site itself performs no, or negligible, function in terms of the main purposes of including land in the Green Belt. We provided a Google Earth image earlier showing this to be the case.

The LUC Addendum Assessment of Proposed 2020 GMSF Allocations (2020) undertook a site-specific assessment of the land subject to Policy GM20 of the Draft GMSF 2019 (i.e. including land beyond just our client's site). It concludes that the wider site for housing would have resulted in 'Low-Moderate' harm only in Green Belt impact terms. See **Appendix EP4** of this letter.



Landscape impact

The Greater Manchester Landscape Character and Sensitivity Assessment (2018), prepared by LUC as part of the GMSF evidence base identifies our site as falling within the Rochdale and Oldham South Pennine Foothills landscape character area of the city-region. The assessment concludes that this area in general has moderate sensitivity only in terms of accommodating new 2 and 3 storey residential development.

The assessment carried out by LUC is very high level. It is difficult to extrapolate anything meaningful from this assessment when looking at specific sites. The character areas identified by LUC extend across very large areas of the city-region and the assessment simply provides a description of the main characteristics of these sub-areas.

As noted at paragraph 4.7 of this Statement, the land subject to Policy GM20 of the Draft GMSF 2019 is characterised as follows:

- It is heavily influenced by existing urban features such as the domestic gardens and residential properties along Ripponden Road, the principal traffic route of Ripponden Road itself, the complex of built development at Sholver Moor Farm and the existing built-up area to the south and west (e.g. Spinners Way, Peak Close, Spring Hall Rise and Burns Close).
- The agricultural land within this draft allocation comprises two well-defined and contained field boundaries enclosed by existing fencing and hedgerow.
- The rising topography and wooded nature of the former quarry to the north, Besom Hill, provides a strong physical barrier to the northern extent of the land within this draft allocation.

- The site is well contained from long-distanced views and seen within the context of the surrounding urban features.

Ecology and trees

The site is not within influencing distance of any ecological designations e.g. Site of Biological Interest, Site of Special Scientific Interest, Special Area of Conservation or Special Protection Area. Site-specific ecology surveys would be prepared and submitted as part of any future planning application. Any necessary mitigation would be incorporated into the final masterplan design.

There are no trees of significance within the site itself, and existing hedgerow would be incorporated into the masterplanning process. The final design would have due regard for the existing trees to the north and eastern boundaries within Besom Hill. Trees do not represent a constraint to the release of this site for housing development.

Trees and ecology do not represent a constraint to development.

Flooding and drainage

The site falls within a Flood Zone 1 i.e. at low risk of flooding. There are existing surface water and foul water connections available given that the site physically adjoins the existing built-up area of Moorside.

The risk of flooding does not represent a constraint to the release of this site for housing development.

Highways

The site is located within easy and convenient walking distance of a wide range of local services and public transport options:

- Bus stop directly adjacent known as Waggon and Horses with regular bus services to destinations such as Oldham Bus Station, Oldham Town Centre and Denshaw (no. 407).
- Whitehall Play Area - 350m.
- St Thomas Primary School - 400m.
- St James Childrens Centre - 475m (this Centre incorporates services such as Job Centre Plus, adult education classes and a toy library).
- Moorside Cricket and Bowling Club - 600m.
- Sholver Youth Centre - 700m.
- Moorside Medical Centre - 750m
- Hodge Clough Primary School - 800m.
- Watershead Academy - 2km.

The site benefits from excellent accessibility in terms of key services and it is well served in terms of public transport provision. In terms of access, SCP have provided a technical note and this is **Appendix EP5** of this Statement. This Note:

- Demonstrates that the site is highly sustainable in location terms in relation to key services, public transport and cycling routes.
- Provides details of a speed survey undertaken along Ripponden Road.
- Provides details as to how safe and convenient access could be provided off Ripponden Road.
- Provides a detailed access drawing at Appendix B with suitable visibility splays shown.

SCP conclude that there are no obstacles to the delivery of this draft housing allocation in highways terms.

Proposed allocation

Our client's site could be allocated as a standalone application as per the land at **Appendix EP1**. Alternatively, it could be allocated as part of a larger site allocation as per the Policy GM20 ('Spinners Way/Alderney Farm') of the Draft GMSF 2019; this policy and the red edge draft allocation is appended at **Appendix EP2** of this letter.

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

Summary and conclusions

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

- The plan-period for the emerging local plan should be extended beyond 2042.
- The housing requirement for the emerging local plan should reflect the standard method.
- An increased housing requirement and the release of viable edge-of-settlement greenfield sites would allow for the authority to make a meaningful contribution towards addressing significant affordable housing needs.
- A higher housing requirement would reflect national planning policy guidance, ensure the plan is positively prepared and align with the Council's objective of addressing the Borough's housing crisis in terms of affordable homes.
- The emerging plan should include an 'exception' policy to allow edge-of-settlement sustainable sites to come forward over the plan-period for affordable housing schemes.
- There is no transparency or rationale behind the Council's minor amendments to the Green Belt boundaries at Appendix 8 of the Publication Local Plan.
- The Local Plan Inspector for the 2005 UDP over 20 years recommended the release of our client's site from the Green Belt notwithstanding development needs in order to provide a more logical and defensible boundary. Now is the time for that recommendation to be implemented.
- Our client's site could be allocated to help meet identified needs as a standalone allocation or otherwise as part of a larger site allocation as per the draft allocation in the 2019 GMSF. This wider land has already been assessed as resulting in 'low-moderate' Green Belt harm only through the LUC Green Belt Assessment 2020, and our client's site does not perform any meaningful Green Belt function.

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

Yours sincerely
Emery Planning

[Redacted signature]

Gareth Salthouse BA (Hons), Mplan, MRTPI
Director

[Redacted contact information]

Enc:

EP1 – Our client's site.

EP2 – Draft Site Allocation GM20 of the 2019 GMSF.

EP3 – Location Plan and Decision Notice for certificate of lawfulness APP/W4223/X/16/3143392 and LPA ref: CL/336820/15.

EP4 - LUC Addendum Assessment of Proposed 2020 GMSF Allocations (2020): Spinners Way and Alderney Farm.
EP5 – SCP Technical Note.

EP1

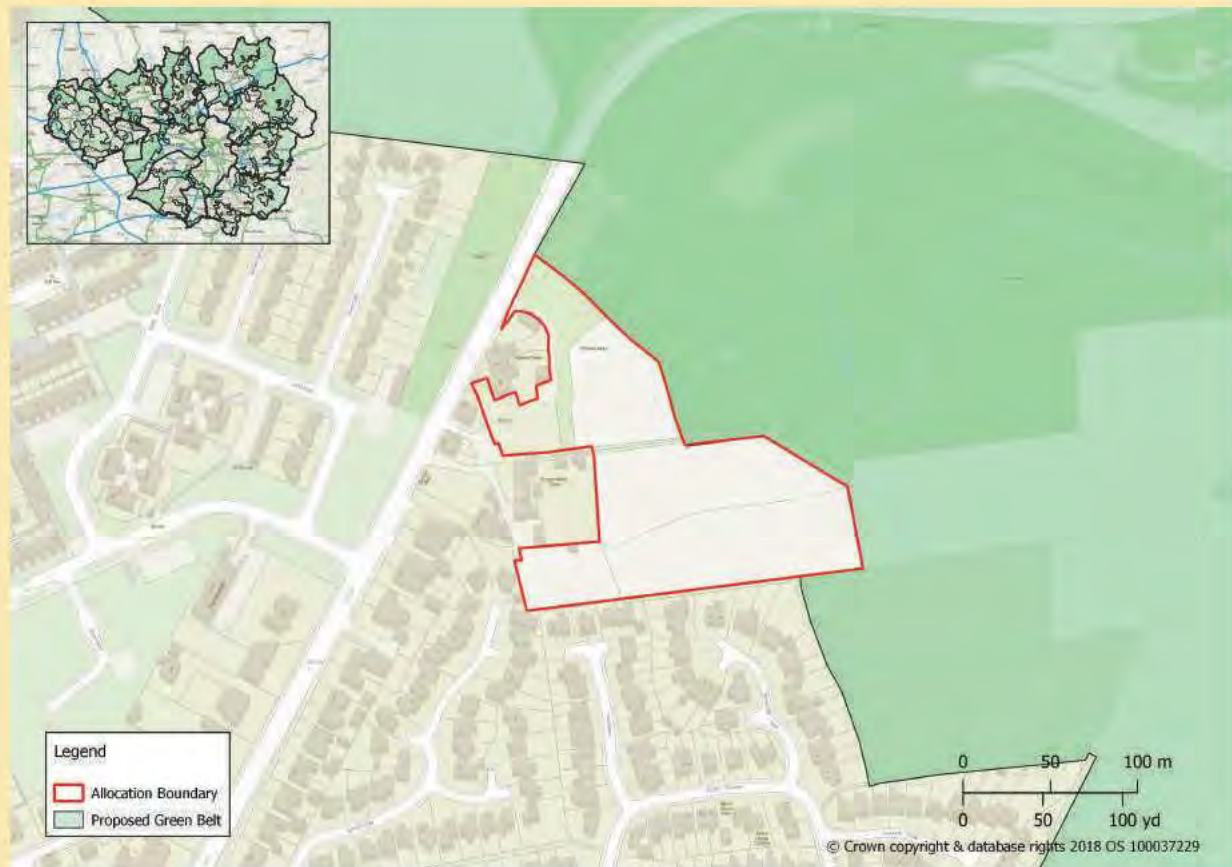
Land to the rear of nos. 746 to 752 Ripponden Road, Oldham



EP2

Policy GM Allocation 20

Spinners Way / Alderney Farm



Development at this site will be required to:

1. Deliver around 50 homes providing a range of dwelling types and sizes so as to deliver more inclusive neighbourhoods and meet local needs;
2. Make provision for affordable homes in line with local planning policy requirements;
3. Provide for appropriate access points to and from the sites in liaison with the local highways authority and take account of and deliver any other highway improvements that may be needed so as to minimise the impact of associated traffic on the surrounding areas and roads and improve connectivity to the wider community;
4. Deliver multi-functional green infrastructure and high quality landscaping within the site, so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts and enhance linkages with the neighbouring communities and countryside. Regard should also be had to the conclusions of the Landscape Character Assessment for the Rochdale and Oldham South Pennines Foothills;

5. Retain and enhance areas of biodiversity within and adjoining the site, most notably the area of priority habitat to the north east of the site, to deliver a clear and measurable net gain in biodiversity;
6. Retain and enhance existing public rights of way running through the site, integrating them as part of the multi-functional green infrastructure network, so as to improve linkages and connections to adjoining communities and countryside;
7. Provide for new and/or improvement of existing open space, sport and recreation facilities, commensurate with the demand generated, in line with local planning policy requirements;
8. Provide for additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;
9. Provide for appropriate health and community facilities to meet the increased demand that will be placed on existing provision;
10. Identify any designated and non-designated heritage assets and assess the potential impact on the asset and their setting, when bringing forward the proposals;
11. Identify any assets of archaeological interest, assess the potential impact on the asset and include appropriate mitigation strategies, which may include controlled investigation; and
12. Be informed by an appropriate flood risk assessment and comprehensive drainage strategy and deliver any appropriate recommendations and measures (including mitigation measures and the incorporation of sustainable drainage systems) so as to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network.

- 11.140** The site is currently designated Green Belt in the Oldham Local Plan. Whilst the site does have a level of ecological value within and adjacent to it that would need to be mitigated and integrated into the development as part of a complementary multi-functional green infrastructure, it is relatively free from constraints and is considered developable for housing.
- 11.141** The site is located on the edge of the urban area on the approach out to Saddleworth. However, it is also close to an area of Sholver (west of Ripponden Road) which falls within the 10% most deprived neighbourhoods in the country. Development of the site therefore has the potential to provide a range of high quality housing to enhance and diversify the existing housing offer to deliver more inclusive neighbourhoods and meet local needs, in what is an attractive and relatively sustainable and accessible location.
- 11.142** The site is well-connected to existing neighbouring residential communities in Moorside and Sholver. It lies approximately 2.5km to 3km from Hill Stores Centre.

- 11.143** There are a number of assets of historical significance in close proximity to the proposed strategic allocation and, whilst outside their boundary, any development would need to consider the impact on their setting through the completion of a Heritage Impact Assessment.
- 11.144** A flood risk assessment will be required to inform any development. A comprehensive drainage strategy for the site as a whole should be prepared as part of the more detailed masterplanning stage, to ensure that undue pressure and burden is not placed on existing utilities infrastructure through piecemeal and uncoordinated development. Proposals should apply greenfield run off rates and be supported by a maintenance plan.

Question 95

Do you agree with the proposed policy GM Allocation 20: Spinners Way/Alderney Farm?

Agree / Mostly agree / Neither agree or disagree / Mostly disagree / Disagree

What is the reason for your answer?

EP3

Appeal Decision

Site visit made on 4 July 2016

by C Sherratt DipURP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 4 August 2016

Appeal Ref: APP/W4223/X/16/3143392

748 Ripponden Road, Oldham, Lancashire OL4 2LP

- The appeal is made under section 195 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991 against a refusal to grant a certificate of lawful use or development (LDC).
 - The appeal is made by Mr J Jaskolka against the decision of Oldham Metropolitan Borough Council.
 - The application Ref CL/336820/15, dated 9 April 2015, was refused by notice dated 11 August 2015.
 - The application was made under section 191(1)(a) of the Town and Country Planning Act 1990 as amended.
 - The use for which a certificate of lawful use or development is sought is garden land (C3).
-

Decision

1. The appeal is allowed and attached to this decision is a certificate of lawful use or development describing the existing use which is considered to be lawful.

Application for costs

2. An application for costs was made by Mr J Jaskolka against Oldham Metropolitan Borough Council. This application is the subject of a separate Decision.

Reasons

3. Section 191(4) of the Town and Country Planning Act 1990 (1990 Act) indicates that if, on an application under that section, the local planning authority are provided with information satisfying them that the use or operations described in the application was lawful at the time of the application, they shall issue a certificate to that effect; and in any other case shall refuse the application. My decision is therefore based on the facts of the case and judicial authority. For the avoidance of doubt, this means that the planning merits of the proposed development are not relevant to this appeal and the main issue is whether the Council's decision to refuse to grant a Certificate of Lawful Use or Development (LDC) was well founded. Accordingly, it is necessary to consider whether, on the balance of probability, the land has been used as a garden for a continuous period of ten years or more prior to the date of the application.
4. The onus is on the appellant to demonstrate that, on the balance of probability, the land has been used as a garden for a continuous period of 10 years. The Council does not provide evidence to contradict the evidence provided by the

appellant. Rather, the Council considers that the evidence provided is not sufficient to demonstrate the continuous use of the land.

5. The evidence submitted to support the application includes two sworn affidavits, photographs taken in 1998 and 2002 and google earth images taken in 2000 and 2005.
6. The sworn affidavits confirm that the appellant purchased the property in 1987 together with the adjacent field. Shortly after purchasing the land it was ploughed, levelled and seeded. Some trees were planted and there was no formal separation between the garden associated with the dwelling and the adjacent land. The affidavits state that the land has been used for purposes incidental to the enjoyment of the dwelling since 1987 and been mowed throughout the growing season.
7. The affidavits are rather limited but nevertheless clearly explain how the land in question has been maintained and used as a garden since 1987. Given that any person who lies about the information contained in an affidavit could be prosecuted for the crime of perjury, and if convicted may be ordered to pay significant fines or sentenced to time in jail, I give these significant weight.
8. Although the affidavits suggest other people could confirm the use of the land during this time, no further statements or affidavits are submitted. The aerial images provide further support at least in so far as they reflect the circumstances of the particular dates the images were taken. There is no explanation as to how the appellant recalls the year that the photographs were taken which reduces the weight that can be afforded to them but they nevertheless offer further support.
9. Whilst I agree with the Council that both the aerial images and photographs do not demonstrate a continuous use of the land, when considered in the round alongside the sworn affidavits and in the absence of any evidence to the contrary, I consider the appellant has discharged the onus of proof, on the balance of probability, incumbent upon him.
10. For the reasons given above I conclude, on the evidence now available, that the Council's refusal to grant a certificate of lawful use or development in respect of garden land (C3) was not well-founded and that the appeal should succeed. I will exercise the powers transferred to me under section 195(2) of the 1990 Act as amended.



Inspector

Lawful Development Certificate

TOWN AND COUNTRY PLANNING ACT 1990: SECTION 191
(as amended by Section 10 of the Planning and Compensation Act 1991)

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND)
ORDER 2015: ARTICLE 39

IT IS HEREBY CERTIFIED that on 9 April 2015 the use described in the First Schedule hereto in respect of the land specified in the Second Schedule hereto and edged in black on the plan attached to this certificate, was lawful within the meaning of section 191(2) of the Town and Country Planning Act 1990 (as amended), for the following reason:

On the balance of probability, the land has been used as a garden for a continuous period of 10 years or more.

Signed

:

Inspector

Date 4 August 2016

Reference: APP/W4223/X/16/3143392

First Schedule

Garden area

Second Schedule

Land at 748 Ripponden Road, Oldham OL4 2LP

NOTES

This certificate is issued solely for the purpose of Section 191 of the Town and Country Planning Act 1990 (as amended).

It certifies that the use /operations described in the First Schedule taking place on the land specified in the Second Schedule was /were lawful, on the certified date and, thus, was /were not liable to enforcement action, under section 172 of the 1990 Act, on that date.

This certificate applies only to the extent of the use /operations described in the First Schedule and to the land specified in the Second Schedule and identified on the attached plan. Any use /operation which is materially different from that described, or which relates to any other land, may result in a breach of planning control which is liable to enforcement action by the local planning authority.

Plan

This is the plan referred to in the Lawful Development Certificate dated: 4 August 2016

by **C Sherratt DipURP MRTPI**

Land at: 748 Ripponden Road, Oldham OL4 2LP

Reference: APP/W4223/X/16/3143392

Scale: Not to scale



EP4

Allocation	2019 release (Ha.)	2020 release (Ha.)	2021 release (Ha.)	Analysis from 2020 addendum report
GMA1.3 Whitefield	62.7	0	0	Area rated as low-moderate overall harm will no longer be released.
GMA3 Kingsway South	200.1	0	0	Area rated as very high harm overall will no longer be released.
GMA20 Spinners Way/ Alderney Farm	2	0	0	Area rated as low-moderate overall harm will no longer be released.
GMA21 Thornham Old Road	34.6	0	0	Area rated as high overall harm will no longer be released.
GMA36 Gravel Bank Road / Unity Mill	6.1	0	0	Area rated as moderate overall harm will no longer be released.
GMA47 Land south of Pennington	53.1	0	0	Area rated as very high overall harm will no longer be released.
GMA17 Hanging Chadder	22.66	22.66	0	Area rated as moderate- high harm will no longer be released.

Figure 6.9 Summary of impact on Green Belt where allocations are to be removed

EP5

Transport and Access Appraisal – Proposed Residential Allocation Site

Land off Ripponden Road, Moorside, Oldham

AS/190150/TN01 - 14 March 2019

Introduction

1. SCP have been instructed by Mr Jaskolka to advise on the transport and access matters associated with the proposed allocation of land to the east of Ripponden Road, Oldham for residential purposes.
2. The site has been identified in the draft Greater Manchester Spatial Framework (GMSF) as a draft housing allocation (Policy GM Allocation 20), with the potential to deliver in the region of 50 dwellings. The location of the allocation site is shown in red on **Figure 1** below:-

Figure 1 – Site Location Plan



3. This technical note has been produced to support the proposed allocation and to demonstrate to the Local Planning and Highway Authority that safe and suitable access can be provided, and that the site can be accessed by sustainable modes of transport.

Existing Conditions

4. The site is located to the east of the A672 Ripponden Road, less than 800m to the north of Moorside and 4.5km to the north-east of Oldham Town Centre. The site currently comprises of undeveloped land with an access provided off the A672 Ripponden Road, serving a small number of existing properties. This access benefits from a ghost island right turn lane, as shown on the images below.



5. Ripponden Road is subject to a 40mph speed limit and, in the vicinity of the site, has a carriageway width of approximately 10m and benefits from a footway and regularly spaced lighting columns on the western side of the road. A footway is also provided to the south of the existing site access on the eastern side of the Ripponden Road.
6. The most recently available five-year road safety record in the vicinity of the site has been obtained from the online facility crashmap. Investigations show that only one accident has occurred in the vicinity of the site during the most recent five-year period, shown in **Figure 2**.

Figure 2 – Accident Location Plan



7. The accident shown was only slight in severity and occurred on Ripponden Road at the junction with a residential access road. Given the low number of accidents, the existing road safety record does not lead to any material concern in the context of the proposed allocation.

Accessibility

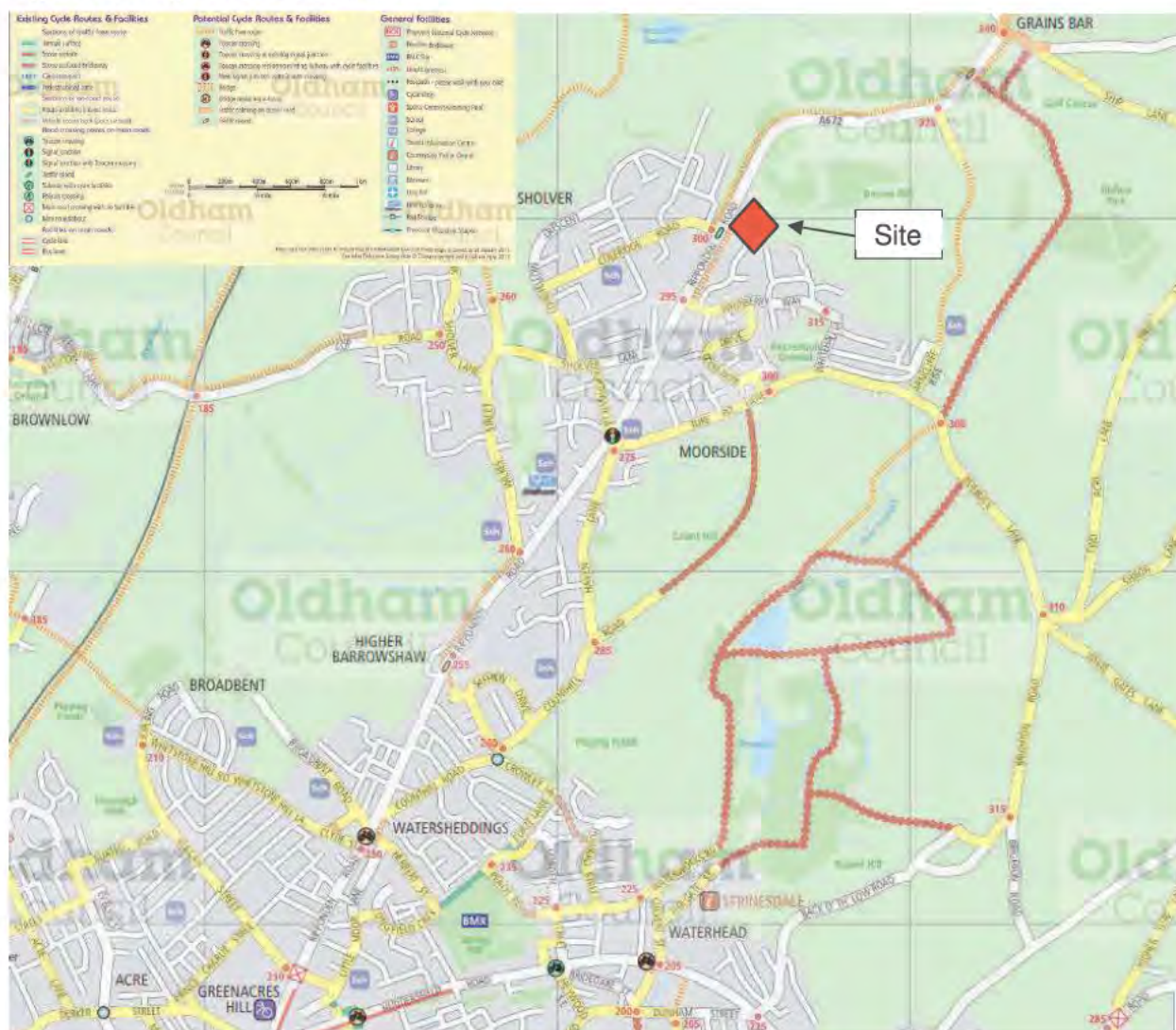
8. The MfS states that walking offers the greatest potential to replace short car trips, particularly those under 2km. The site is within an acceptable walking distance of a number of facilities and amenities within Moorside. A selection of the facilities accessible from the site by foot have been included in **Table 1** below: -

Table 1 – Facilities within 2km Walk Distance of the Site

Facility	Details	Distance from the Site
Bus Stop	Ripponden Road	75m
Convenience Store	One Stop, Coleridge Road	500m
ATM	One Stop, Coleridge Road	500m
Primary School	St Thomas; Moorside C E Primary School	500m
Doctor	Moorside Medical Centre, Ripponden Road	850m
Pharmacy	Hobbs Pharmacy, Ripponden Road	900m
Nursery	The Hillside Nursery	950m
Pub/Restaurant	The King's Arms	950m
Supermarket	Co-op Food	1000m
Post Office	Ripponden Road	2000m

9. A continuous footway on Ripponden Road connects the site to the centre of Moorside and into Oldham, only crossing minor residential roads on route.
10. **Table 1** demonstrates that the site is located less than 100m from the nearest bus stop on Ripponden Road. The bus stop is served by the Stagecoach service number 407, which provides access between Oldham and Denshaw via Moorside and Pennine Meadows, up to every 60 minutes.
11. There are a number of advisory cycle routes in the vicinity of the site, including those to the south of the site off Ripponden Road. There are also numerous traffic-free cycle routes in the vicinity of the site including to the north of the site on Ripponden Road and those off Sholver Lane and Arncliffe Rise. A plan showing the cycle facilities local to the site is included in **Figure 3** below: -

Figure 3 – Cycle facilities plan



Speed Survey

12. SCP conducted a speed survey in order to empirically determine what the design speed of Ripponden Road is in the vicinity of the proposed site access. The survey was conducted on Monday 4th March 2019 between 10:00 and 15:00, and measured speeds on the northbound and southbound approaches to the proposed site access location.
13. The sample size of traffic speeds recorded during the survey was 200 vehicles in both directions. This sample size is considered sufficient to provide a good representation of 85th percentile traffic speeds at the approach to the site access, in accordance with the Design Manual for Roads and Bridges TA 22 / 81.
14. A copy of the speed survey results and accompanying design speed analysis is contained in **Appendix A**.

15. The speed survey was conducted on Monday 4th March 2019, during which the conditions were fine, mainly cloud and breezy, and the road surface was damp.
16. The speed survey confirmed that the 85th percentile wet-weather design speed of Ripponden Road on the approaches to the proposed site access location are shown below and demonstrate that 85th percentile speeds are slightly above the 40mph speed limit: -

85th Percentile Wet-Weather Design Speed of Ripponden Road in Vicinity of the Proposed Site Access	
Northbound	42mph / 67kph
Southbound	44mph / 70kph

Potential Access Arrangements

17. Vehicular access to the development will be provided off Ripponden Road at the location of the existing access. The access will be upgraded to provide a standard 5.5m wide carriageway and 2m wide footways, along with minor amendments to the existing ghost island right turn lane markings. It is also proposed that the existing 30mph speed limit is relocated further to the north on Ripponden Road in advance of the bend in the road. The proposed site access arrangements and change in speed limit are shown on Drawing Number SCP/190150/F01 in **Appendix B**.
18. The proposed relocation of the 30mph speed limit will need to be assessed having regard to guidance contained in the Department for Transport's Circular 01/2013. However, extending the 30mph further to the north on Ripponden Road is considered appropriate in this instance for the following reasons:-
 - Ripponden Road is predominantly urban in nature and currently provides direct frontage access to a number of existing properties and experiences on-street parking. It also experiences significant levels of pedestrian activity, with a number of pedestrian crossings and bus stops provided;
 - The development of this site will result in the existing built / urban area extending further to the north, creating further activity on this section of Ripponden Road; and
 - Existing signage is already provided on the southbound approach to the bend (at the proposed location of the change in speed limit) advising drivers to travel at a maximum of 30mph around the bend. Extending the 30mph speed limit to the location of the existing signage will help to formalise the advisory speeds.

19. Based on the 30mph speed limit, the required visibility splays from the site access of 2.4m x 43m are achievable, as shown on Drawing Number SCP/190150/F01 in **Appendix B**.
20. Pedestrian and cycle access to the site will be provided from the same location as the vehicular access on Ripponden Road, with 2m wide footways provided on both sides of the access road.

Trip Generation

21. In order to estimate the trip generating potential of the application site, average trip rates from the industry-standard TRICS Database (V7.5.4) have been obtained.
22. The TRICS outputs for the proposed residential development are presented in **Appendix C** and are summarised in **Table 2** below: -

Table 2 – Residential Use Trip Rates (Trip Rates Per Dwelling)

Mode	Weekday AM Peak Hour		Weekday PM Peak Hour	
	Arrivals	Departures	Arrivals	Departures
Vehicles	0.107	0.339	0.305	0.133

23. The above trip rates have been applied to the potential 50 dwellings to determine the trip generation forecasts for the development, as summarised in **Table 3** below: -

Table 3 – Proposed Residential Use Trip Generation (50 dwellings)

Mode	Weekday AM Peak Hour		Weekday PM Peak Hour	
	Arrivals	Departures	Arrivals	Departures
Vehicles	5	17	15	7

24. As shown above, it is estimated that the scheme will generate a total of 22 two-way vehicle movements in both the AM and PM peak hour. Volumetrically, this equates to an additional two-way vehicle movement every 2-3 minutes in both the AM and PM peak hours. This level of traffic is not considered to lead to any operational or highway safety issues on the roads surrounding the site. Notwithstanding this, the impact of the development will be assessed through the submission of a detailed Transport Statement at planning application stage.

Summary

25. Having regard to the analysis presented above, there is considered to be no constraints from a highways perspective which would prevent this land from coming forward for residential use.

S|C|P

APPENDIX A

Speed (mph)	Frequency	
x	f	f*x
7	0	0
8	0	0
9	0	0
10	0	0
11	0	0
12	0	0
13	0	0
14	0	0
15	0	0
16	0	0
17	0	0
18	0	0
19	0	0
20	0	0
21	0	0
22	0	0
23	0	0
24	0	0
25	0	0
26	0	0
27	0	0
28	0	0
29	3	87
30	5	150
31	9	279
32	9	288
33	11	363
34	23	782
35	18	630
36	16	576
37	15	555
38	19	722
39	19	741
40	14	560
41	9	369
42	11	462
43	4	172
44	5	204
45	2	90
46	1	46
47	1	47
48	1	48
49	2	98
50	0	0
51	0	0
52	1	52
53	0	0
54	0	0
55	0	0
56	0	0
57	0	0
58	0	0
59	0	0
60	0	0
61	1	61
62	0	0
63	0	0
64	0	0
65	0	0
66	0	0
67	0	0
68	0	0
69	0	0
70	0	0
71	0	0
72	0	0
73	0	0
74	0	0
75	0	0
76	0	0
77	0	0
78	0	0
79	0	0
80	0	0
81	0	0
82	0	0
83	0	0
84	0	0
85	0	0
86	0	0
87	0	0
88	0	0
89	0	0
90	0	0
91	0	0
92	0	0
93	0	0
94	0	0
95	0	0
96	0	0
97	0	0
98	0	0
Total	200	7442

Speed (mph)	Frequency	Class Mark	x - mean	x ²
Band	f	x	e	e ²
6.5-7.4	0	7	912.64	0.00
7.5-8.4	0	8	953.22	0.00
8.5-9.4	0	9	798.87	0.00
9.5-10.4	0	10	740.38	0.00
10.5-11.4	0	11	696.96	0.00
11.5-12.4	0	12	656.54	0.00
12.5-13.4	0	13	618.12	0.00
13.5-14.4	0	14	581.70	0.00
14.5-15.4	0	15	547.28	0.00
15.5-16.4	0	16	514.86	0.00
16.5-17.4	0	17	484.44	0.00
17.5-18.4	0	18	456.02	0.00
18.5-19.4	0	19	431.60	0.00
19.5-20.4	0	20	396.18	0.00
20.5-21.4	0	21	362.76	0.00
21.5-22.4	0	22	331.34	0.00
22.5-23.4	0	23	291.92	0.00
23.5-24.4	0	24	174.50	0.00
24.5-25.4	0	25	149.08	0.00
25.5-26.4	0	26	125.66	0.00
26.5-27.4	0	27	104.24	0.00
27.5-28.4	0	28	84.82	0.00
28.5-29.4	3	29	67.40	202.31
29.5-30.4	5	30	51.98	259.92
30.5-31.4	9	31	38.56	347.09
31.5-32.4	9	32	27.14	244.30
32.5-33.4	11	33	17.72	184.97
33.5-34.4	23	34	10.30	296.99
34.5-35.4	18	35	4.88	87.91
35.5-36.4	16	36	1.46	23.43
36.5-37.4	15	37	0.04	0.56
37.5-38.4	19	38	2.62	11.86
38.5-39.4	19	39	3.20	60.86
39.5-40.4	14	40	7.78	108.98
40.5-41.4	9	41	14.36	129.28
41.5-42.4	11	42	22.94	252.29
42.5-43.4	4	43	23.52	134.10
43.5-44.4	5	44	46.10	276.62
44.5-45.4	2	45	60.68	121.37
45.5-46.4	1	46	77.26	77.26
46.5-47.4	1	47	95.84	95.84
47.5-48.4	1	48	116.42	116.42
48.5-49.4	2	49	139.00	278.01
49.5-50.4	0	50	163.58	0.00
50.5-51.4	0	51	189.16	0.00
51.5-52.4	1	52	218.74	218.74
52.5-53.4	0	53	249.32	0.00
53.5-54.4	0	54	281.90	0.00
54.5-55.4	0	55	316.48	0.00
55.5-56.4	0	56	353.06	0.00
56.5-57.4	0	57	391.64	0.00
57.5-58.4	0	58	432.22	0.00
58.5-59.4	0	59	474.80	0.00
59.5-60.4	0	60	519.38	0.00
60.5-61.4	1	61	565.96	565.96
61.5-62.4	0	62	614.54	0.00
62.5-63.4	0	63	665.12	0.00
63.5-64.4	0	64	717.70	0.00
64.5-65.4	0	65	772.28	0.00
65.5-66.4	0	66	828.86	0.00
66.5-67.4	0	67	887.44	0.00
67.5-68.4	0	68	948.02	0.00
68.5-69.4	0	69	1010.60	0.00
69.5-70.4	0	70	1075.18	0.00
70.5-71.4	0	71	1141.76	0.00
71.5-72.4	0	72	1210.34	0.00
72.5-73.4	0	73	1280.92	0.00
73.5-74.4	0	74	1353.50	0.00
74.5-75.4	0	75	1428.08	0.00
75.5-76.4	0	76	1504.66	0.00
76.5-77.4	0	77	1583.24	0.00
77.5-78.4	0	78	1663.82	0.00
78.5-79.4	0	79	1746.40	0.00
79.5-80.4	0	80	1830.98	0.00
80.5-81.4	0	81	1917.56	0.00
81.5-82.4	0	82	2006.14	0.00
82.5-83.4	0	83	2096.72	0.00
83.5-84.4	0	84	2189.30	0.00
84.5-85.4	0	85	2283.88	0.00
85.5-86.4	0	86	2380.46	0.00
86.5-87.4	0	87	2479.04	0.00
87.5-88.4	0	88	2579.62	0.00
88.5-89.4	0	89	2682.20	0.00
89.5-90.4	0	90	2786.78	0.00
90.5-91.4	0	91	2893.36	0.00
91.5-92.4	0	92	3001.94	0.00
92.5-93.4	0	93	3112.52	0.00
93.5-94.4	0	94	3225.10	0.00
94.5-95.4	0	95	3339.68	0.00
95.5-96.4	0	96	3456.26	0.00
96.5-97.4	0	97	3574.84	0.00
97.5-98.4	0	98	3695.42	0.00
Total	200			4045.18

Survey Details

Date: 04/03/2019
Road / Location: A672 Ripponden Road, Oldham
Direction of traffic: Northbound
Weather: Wet
Surveyor: Andy Haxby
Speed Limit: 40mph

DMRB - TA22/81 Calculations

Mean Speed = $\sum(f \cdot x) / \sum f$ 37.21 mph
Standard deviation = $\sqrt{\sum(e \cdot f) / \sum f}$ 4.51 mph
Dry 85th%ile Design Speed = Mean Speed + Standard Deviation
Wet 85th%ile Design Speed Correction = -2.5mph

Therefore, the 85th%ile Wet Condition = 41.72 mph
or
67.13 kph

Speed (mph)	Frequency	
x	f	f*x
7	0	0
8	0	0
9	0	0
10	0	0
11	0	0
12	0	0
13	0	0
14	0	0
15	0	0
16	0	0
17	0	0
18	0	0
19	0	0
20	0	0
21	0	0
22	0	0
23	0	0
24	0	0
25	0	0
26	0	0
27	0	0
28	0	0
29	0	0
30	0	0
31	1	31
32	3	96
33	3	99
34	12	408
35	9	315
36	16	576
37	22	814
38	21	798
39	21	819
40	16	640
41	18	738
42	14	588
43	10	430
44	12	528
45	4	180
46	4	184
47	2	94
48	4	192
49	3	147
50	1	50
51	1	51
52	0	0
53	0	0
54	0	0
55	0	0
56	0	0
57	0	0
58	0	0
59	1	59
60	0	0
61	0	0
62	0	0
63	0	0
64	0	0
65	0	0
66	0	0
67	0	0
68	0	0
69	0	0
70	0	0
71	0	0
72	0	0
73	0	0
74	0	0
75	0	0
76	0	0
77	0	0
78	0	0
79	0	0
80	0	0
81	0	0
82	0	0
83	0	0
84	0	0
85	0	0
86	0	0
87	0	0
88	0	0
89	0	0
90	0	0
91	0	0
92	0	0
93	0	0
94	0	0
95	0	0
96	0	0
97	0	0
98	0	0
Total	200	7917

Speed (mph)	Frequency	Class Mark	x - mean	x^2
Band	f	x	e	e^2
6.5-7.4	0	7	1061.78	0.00
7.5-8.4	0	8	367.81	0.00
8.5-9.4	0	9	986.44	0.00
9.5-10.4	0	10	876.27	0.00
10.5-11.4	0	11	817.10	0.00
11.5-12.4	0	12	790.93	0.00
12.5-13.4	0	13	706.76	0.00
13.5-14.4	0	14	654.59	0.00
14.5-15.4	0	15	604.42	0.00
15.5-16.4	0	16	556.25	0.00
16.5-17.4	0	17	510.08	0.00
17.5-18.4	0	18	465.91	0.00
18.5-19.4	0	19	423.74	0.00
19.5-20.4	0	20	383.57	0.00
20.5-21.4	0	21	345.40	0.00
21.5-22.4	0	22	309.23	0.00
22.5-23.4	0	23	275.06	0.00
23.5-24.4	0	24	242.89	0.00
24.5-25.4	0	25	212.72	0.00
25.5-26.4	0	26	184.55	0.00
26.5-27.4	0	27	158.38	0.00
27.5-28.4	0	28	134.21	0.00
28.5-29.4	0	29	112.04	0.00
29.5-30.4	0	30	91.87	0.00
30.5-31.4	1	31	73.70	73.70
31.5-32.4	3	32	57.53	172.00
32.5-33.4	3	33	43.36	190.09
33.5-34.4	12	34	31.19	374.31
34.5-35.4	9	35	21.02	189.29
35.5-36.4	16	36	12.85	205.84
36.5-37.4	22	37	5.68	147.01
37.5-38.4	21	38	2.51	52.76
38.5-39.4	21	39	0.34	7.19
39.5-40.4	16	40	0.17	3.10
40.5-41.4	18	41	2.00	36.04
41.5-42.4	14	42	5.83	81.85
42.5-43.4	10	43	11.66	116.62
43.5-44.4	12	44	19.49	233.31
44.5-45.4	4	45	29.32	117.99
45.5-46.4	4	46	41.15	169.61
46.5-47.4	2	47	54.98	109.96
47.5-48.4	4	48	70.81	283.25
48.5-49.4	3	49	86.64	285.93
49.5-50.4	1	50	103.47	109.47
50.5-51.4	1	51	120.30	130.30
51.5-52.4	0	52	137.13	0.00
52.5-53.4	0	53	153.96	0.00
53.5-54.4	0	54	170.79	0.00
54.5-55.4	0	55	187.62	0.00
55.5-56.4	0	56	204.45	0.00
56.5-57.4	0	57	221.28	0.00
57.5-58.4	0	58	238.11	0.00
58.5-59.4	1	59	254.94	376.94
59.5-60.4	0	60	416.77	0.00
60.5-61.4	0	61	458.60	0.00
61.5-62.4	0	62	500.43	0.00
62.5-63.4	0	63	542.26	0.00
63.5-64.4	0	64	584.09	0.00
64.5-65.4	0	65	625.92	0.00
65.5-66.4	0	66	667.75	0.00
66.5-67.4	0	67	709.58	0.00
67.5-68.4	0	68	751.41	0.00
68.5-69.4	0	69	793.24	0.00
69.5-70.4	0	70	835.07	0.00
70.5-71.4	0	71	876.90	0.00
71.5-72.4	0	72	918.73	0.00
72.5-73.4	0	73	960.56	0.00
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75.5-76.4	0	76	1086.05	0.00
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78.5-79.4	0	79	1211.54	0.00
79.5-80.4	0	80	1253.37	0.00
80.5-81.4	0	81	1295.20	0.00
81.5-82.4	0	82	1337.03	0.00
82.5-83.4	0	83	1378.86	0.00
83.5-84.4	0	84	1420.69	0.00
84.5-85.4	0	85	1462.52	0.00
85.5-86.4	0	86	1504.35	0.00
86.5-87.4	0	87	1546.18	0.00
87.5-88.4	0	88	1588.01	0.00
88.5-89.4	0	89	1629.84	0.00
89.5-90.4	0	90	1671.67	0.00
90.5-91.4	0	91	1713.50	0.00
91.5-92.4	0	92	1755.33	0.00
92.5-93.4	0	93	1797.16	0.00
93.5-94.4	0	94	1838.99	0.00
94.5-95.4	0	95	1880.82	0.00
95.5-96.4	0	96	1922.65	0.00
96.5-97.4	0	97	1964.48	0.00
97.5-98.4	0	98	2006.31	0.00
Total	200			3380.56

Survey Details

Date: 04/03/2019
Road / Location: A672 Ripponden Road, Oldham
Direction of traffic: Southbound
Weather: Wet
Surveyor: Andy Haxby
Speed Limit: 40mph

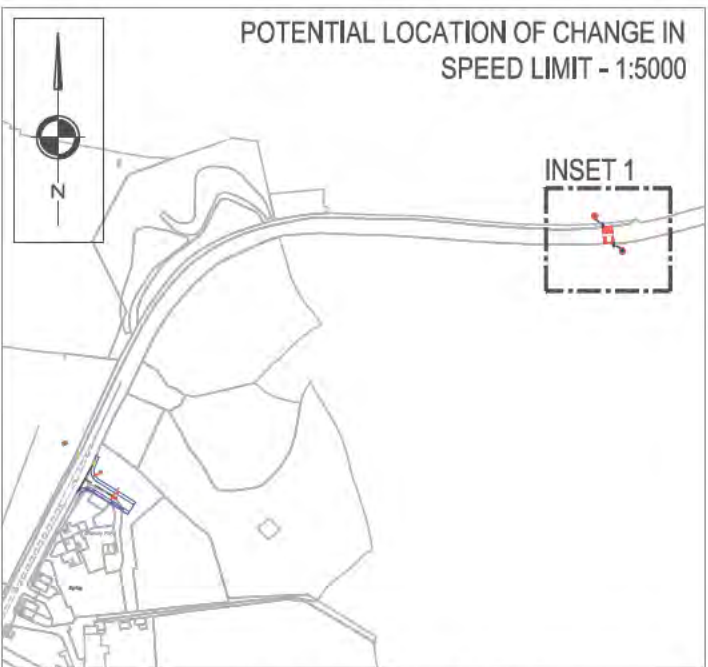
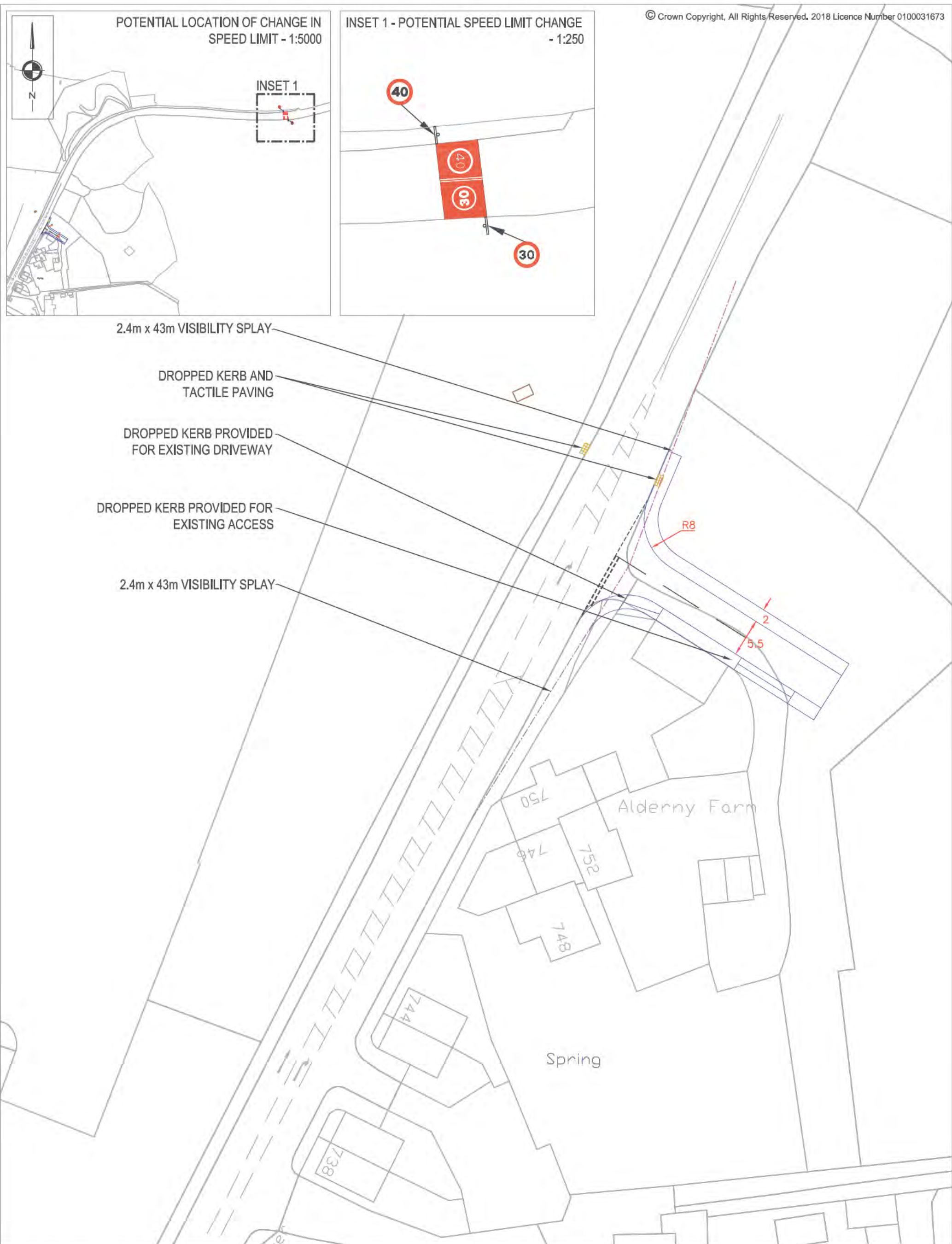
DMRB - TA22/81 Calculations

Mean Speed = $\sum(f \cdot x) / \sum f$ 39.59 mph
Standard deviation = $\sqrt{\sum(e^2) / \sum f}$ 4.12 mph
Dry 85th%ile Design Speed = Mean Speed + Standard Deviation
Wet 85th%ile Design Speed Correction = -2.5mph

Therefore, the 85th%ile Wet Condition = 43.71 mph
or
70.32 kph

S|C|P

APPENDIX B



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S C P Transportation Planning : Infrastructure Design Coleyn Chambers, 19 York Street, Manchester, M2 3BA, Tel 0161 832 4400, www.scptransport.co.uk, Email info@scptransport.co.uk	Client	MR JASKOLKA	Drawing Title	Scale	By	Drawing No.
	Project Title	RIPPONDEN ROAD	POTENTIAL SITE ACCESS AND CHANGE IN SPEED LIMIT	Date	Checked	SCP/190150/SK01
				Approved/Unapproved	Status	Revision

From: SPPlanning.RFH [REDACTED]
Sent: 27 March 2026 15:46
To: SPI Consultations
Cc: Elizabeth Dryden-Stuart; Sylvia Whittingham; Helen Telfer
Subject: Oldham Regulation 19 - EA Formal Response
Attachments: Oldham Reg 19 Final.pdf; Oldham Local Plan Publication Plan Cooperation Statement - SS.pdf

Dear Planners

Please find attached our formal response. Should you wish to discuss this in more detail please do not hesitate to contact me.

Kind Regards

Steve Sayce
Sustainable Places Technical Leader

The Environment Agency
Sustainable Places

[REDACTED]

Pronouns [he/him](#) ([why is this here?](#))

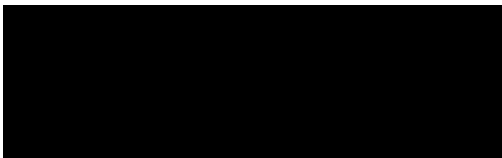
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Oldham Local Plan: Publication Plan

Co-operation Statement

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

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

My organisation has no unresolved matters which prevent me from signing the Oldham Local Plan Statement of Common Ground.	
My organisation is unable to currently sign the Oldham Local Plan Statement of Common Ground for the reasons set out in the accompanying statement.	
Organisation	The Environment Agency
Name	Mr Stephen Sayce
Position	Sustainable Places Technical Specialist
Signature	
Date	27 March 2026

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

Date:

25 March 2026

**Regulation 19 Consultation.
Oldham Local Plan – Publication Plan Document**

Thank you for consulting the Environment Agency with the Oldham Local Plan, Publication Plan Document.

Environment Agency position

We generally support the publication of the Oldham Local Plan at Regulation 19 stage.

Having reviewed the plan and its evidence base, including the in-house produced Strategic Flood Risk Assessment, Update for Oldham Local Plan – Publication Plan (January 2026) and relevant policies, with regards to matters within our remit only, we consider the Local Plan to be:

- Sound, in that it is positively prepared, justified, effective, and consistent with national policy
- Legally compliant
- In accordance with the Duty to Cooperate

Further comments and recommendations

We provide the comments below, include minor recommendations, for the intention to strengthen the clarity and robustness of the Strategic Flood Risk Assessment and associated wording within the plan. These suggestions do not affect our overall conclusion regarding compliance, soundness and Duty to Cooperate.

Strategic Flood Risk Assessment

The Strategic Flood Risk Assessment Update has generally been carried out proportionately and read with the Places for Everyone Strategic Flood Risk Assessment provides an appropriate basis for decision-making. The conclusions previously reached through the Places for Everyone, Strategic Flood Risk Assessment process remain generally valid, and the updated flood modelling undertaken by the Environment Agency does not change the overall assessment of the strategic sites related to Oldham.

We do recommend a small number of refinements to enhance the document's robustness and better inform developers at application stage:

Where the updated modelling identifies slight increases in Flood Zone 2 and 3 extents (for example **JPA10 Beal Valley, JPA12 Broadbent Moss**), the Strategic Flood Risk Assessment update would benefit from magnified mapping of the entire strategic allocations showing the most up to date flood mapping. This will support developers and ensure greater transparency when considering layout, design, and mitigation. This would be of greatest benefit to inform JPA123 Broadbent Moss which has an increase of flood risk towards the south of Royton Moss.

Strategic Allocation JPA 13, Cowlshaw - Our Flood Map for Planning indicates a slight increase in Flood Zones 2 and 3 from Chew Brook. However, this increase is below the agreed 10% threshold for the total allocation area and can therefore be considered manageable, subject to a site-specific flood risk assessment.

Strategic Allocation JPA 14, Cowlshaw - Our Flood Map for Planning indicates a slight increase in Flood Zones 2 and 3 at the source of the River Irk. However, this increase is below the agreed 10% threshold for the total allocation area and can therefore be considered manageable, subject to a site-specific flood risk assessment

Oldham Local Plan - Regulation 19

Our comments on the Oldham Local Plan are appended to this response.

Statement of Common Ground

Our signed Statement of Common Ground is provided separately from this response.

Yours faithfully

Mr Stephen Sayce
Sustainable Places Technical Specialist

[Redacted signature block]

This form has two parts –

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

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

boxes below but complete the full contact details of the agent in 2.

Title	Mr	
First Name	Stephen	
Last Name	Sayce	
Job Title (where relevant)	Planning Specialist	
Organisation (where relevant)	The Environment Agency	
Address Line 1	Richard Fairclough House	
Line 2	Knutsford Road	
Line 3	Warrington	
Line 4		
Post Code	WA4 1HT	
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation: The Environment Agency

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

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

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

The National Planning Policy Framework (NPPF) requires that flood risk is managed and, where possible, reduced. We recommend that paragraph 12.1 is updated to reflect this, for example;

The Local Plan needs to help reduce greenhouse gas emissions; mitigate and, where possible, reduce storm and flood risks, reduce overheating and water scarcity, minimise vulnerability and improve resilience, and support renewable and low carbon energy and associated infrastructure.

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

Part B – Please use a separate sheet for each representation

Name or Organisation: The Environment Agency

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

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Hydropower schemes offer a sustainable source of clean energy, but their location and design can sometimes conflict with Water Framework Directive requirements if not fully assessed. We therefore recommend that paragraph 12.12 be expanded to indicate that an assessment for compliance with the Water Framework Directive may also be required. For example;

Planning applications for hydropower should normally be accompanied by a Flood Risk Assessment and may also require an assessment to demonstrate the planning application is within compliance with the water framework directive.

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

Part B – Please use a separate sheet for each representation

Name or Organisation: The Environment Agency

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

Paragraph

Policy

CC2

Policies Map

4. Do you consider the Local Plan is:

1. Legally compliant

Yes

☒

No

☐

2. Sound

Yes

☒

No

☐

3. Complies with the Duty to Co-operate

Yes

☒

No

☐

Please tick as appropriate

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

(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.

Bullet point 1 should be amended to ensure a flood risk assessment is required where a site is in flood zone 3, not just 3a. For example;

A site-specific Flood Risk Assessment (FRA) is required where a site is:

1. Within Flood Zone 3 or Flood Zone 2;

(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:

☒

☒

☒

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.

From: Pauline Shearer MSc BA Hons MRTPI [REDACTED]
Sent: Thursday, March 26, 2026 13:24
To: SPI Consultations <SPI.Consultations@oldham.gov.uk>
Subject: Oldham Local Plan Review - Publication Draft [REDACTED]

Please find attached our response to the Oldham Local Plan Publication Draft.

The comments are in relation to policy wording. Sport England has previously provided comments in relation to specific site allocations which should also be considered.

We welcome the opportunity to discuss Sport England comments with the Oldham planning team with a view to amending our position if appropriate.

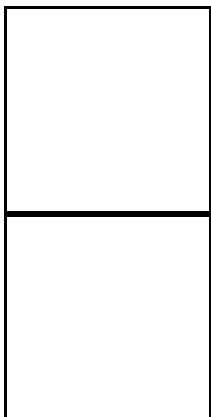
Please note that Sport England does not have the resources to review the policy map to confirm or otherwise where policies impact playing fields and sports facilities and our latest comments are a review of Draft Policy wording. This does not affect our statutory role under the terms of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Yours sincerely,

Pauline Shearer MSc BA Hons MRTPI
Planning Manager

[REDACTED]





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From: noreply@salesforce.com on behalf of Pauline Shearer MSc BA Hons MRTPI
[REDACTED]
Sent: 20 March 2026 10:07
To: SPI Consultations
Subject: Oldham Local Plan Review - Publication Draft [REDACTED]
Attachments: R19 SE response - Active Design - Support_rtf.html; R19 SE response - CO1 - Obj_rtf.html; R19 SE response - CO2 - Obj_rtf.html; R19 SE response - CO3 - Obj_rtf.html; R19 SE response - CO4 - Obj_rtf.html; R19 SE response - IN2 - Comment_rtf.html; R19 SE response - IN3 - Support_rtf.html; R19 SE response - N2 - Comment_rtf.html; R19 SE response - OL4 - Obj_rtf.html

Please find attached our response to the Oldham Local Plan Publication Draft.

The comments are in relation to policy wording. Sport England has previously provided comments in relation to specific site allocations which should also be considered.

We welcome the opportunity to discuss Sport England comments with the Oldham planning team with a view to amending our position if appropriate.

Please note that Sport England does not have the resources to review the policy map to confirm or otherwise where policies impact playing fields and sports facilities and our latest comments are a review of Draft Policy wording. This does not affect our statutory role under the terms of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Yours sincerely,

Pauline Shearer MSc BA Hons MRTPI
Planning Manager

[REDACTED]







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	Pauline	
Last Name	Shearer	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Sport England	
Address Line 1	Sportpark	
Line 2	1<sup>st</sup> Floor	
Line 3	3 Oakwood Drive	
Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	N3; D1; T1	Policies Map	
-----------	----------------------	--------	------------	--------------	----------------------

4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

Sport England are supportive of the inclusion of reference to our Active Design guidance as the document provides clear guidance to encourage active lifestyles, through active environments and upholds and conforms to the aims of Section 8 of the NPPF in this regard and its inclusion in policy wording and RJs strengthens its role in doing this.

CO2 is not included in the above reference as this policy needs amendments – see other Sport England comment in relation to it.

(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.

n/a

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

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☐ /

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

☐

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

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

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

n/a

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

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

☐ /

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

☐ /

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

☐ /

The Adoption of the Oldham Local Plan.



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
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This form has two parts –

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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	Pauline	
Last Name	Shearer	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Sport England	
Address Line 1	Sportpark	
Line 2	1<sup>st</sup> Floor	
Line 3	3 Oakwood Drive	
Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	CO1	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.

Sport England appreciates that the LPA is attempting to provide a policy to protect facilities and open space for sport and recreation, but is concerned that the current policy wording will not adequately do that. The issues with the policy are outlined below, but Sport England would like to work with the LPA to ensure that detailed policy wording fully conforms to the aims of the NPPF and provides sufficient clarity and protection of such facilities.

The policy is somewhat confused as it sets out what is broadly needed for sport and recreation (and open spaces), then appears to possibly split those into separate policy requirements, however this is not clear. The introductory paragraphs 18.1 and 18.2, include sport and recreation provision in the term 'Open Space' therefore the first part of the policy also includes how loss of sports facilities will be considered.

CO1 - Paragraph 2 and the footnote reference will potentially limit the coverage of CO1 and potentially miss overlooked playing field sites. Sport England does not have the resources to review the policy map coverage to confirm or otherwise where this could be the case.

Point 1 – this introduces the potential for conflict between typologies of:- open space; and sport and recreation facilities; both rely on separate evidence bases where one could contradict another and would not provide appropriate levels of evidence based protection of playing fields and outdoor sport and recreation.

Point 2 – includes reference to footnote 160 which is not appropriate to the assessment of playing field site. This point also does not include 'sport and recreation' therefore it would not apply to those sites, many of which would include playing field.

Point 3 – this is an 'enabling' principle to justify loss of playing field which is not supported by Sport England. It is unclear as to the intent of this part of the policy.

Paragraph 3 refers to the need for lost open space to be replaced by equivalent or better, however refers only to the need to have regard to the open space standards. The requirement to replace should also refer to the latest Playing Pitch Strategy and should insist that proposals meet the latest assessment requirements rather than using the phrase 'have regard to.' Replacement should be evidence based rather than merely cross referenced with CO2.

The second part of the policy 'Playing fields, pitches and outdoor sports provision' seeks to protect such sites using the whole of CO1. However for the reasons above, this may not offer sufficient protection.

Sport England does not consider that the 2nd paragraph will provide sufficient protection for playing fields. Playing field loss should be avoided and should be considered in terms of Oldham's up to date assessment of need. The term 'having regard to' is too weak to establish this in the policy wording. In addition, an assessment of any playing field loss should be based on Sport England's playing field protection policy and exceptions to strengthen this policy.

The final paragraph introduces ambiguity with the phrase 'where appropriate' in considering replacement provision. Amended wording is suggested below for the second paragraph of this part of the policy which if included, negates the need for this final paragraph.

RJ 18.5 Any lost provision needs to meet the tests of the NPPF and policy CO1 not CO2 which is a 'provision' policy. The LPA should avoid using the term 'case-by-case' as there is not definition of this and in any planning application submission, each will be determined on its own merits in any event. It is best to avoid referring to the PPOSS/PPS by date or state 'as amended or updated.'

RJ 18.6 Sport England supportive of the wording which should be better expressed in the policy set out and wording as suggested below. This aim appears to be repeated somewhat at 18.8. Both paragraphs could be combined and reworded for better clarity.

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

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

The following are suggested rewording, however Sport England would prefer to see two separate policies for Open Space and Outdoor Sport and Recreation Facilities thereby ensuring clarity and providing the most appropriate policy wording for each. Currently CO1 is confused in terms of how each would be considered.

Amended paragraph 2:
Removal of footnote reference 158.

Amended point 2:
Removal of footnote reference 160.
Reword as follows:

'Based on local evidence, the Council consider that the open space is surplus to local needs and the land is not required to meet deficiencies within its typology; or'

Amended paragraph 3:
'With the exception of circumstance 2 above, the loss of open space resulting from proposed development should be replaced by at least equivalent or improved open space (based on the latest needs assessment) either onsite in a different part of the proposed development, or offsite in a suitable location which should be determined by the identified deficiencies.'

Amended Playing fields, pitches and outdoor sports provision

2nd paragraph

It is suggested that the whole of paragraph 2 is replaced as follows:

'Development resulting in the loss of playing fields or outdoor sports provision (in whole or part) will not be supported unless the following is demonstrated:

- A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the area which will remain following the development and the site has no special significance to the interests of sport;
- The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
- The proposed development affects only land incapable of forming part of a playing pitch, nor prejudices the use of any remaining areas of playing field.
- The area lost will be replaced, prior to the commencement of development, by a new area of playing field:
 - of equivalent or better quality, and
 - of equivalent or greater quantity, and
 - in a suitable location, and
 - subject to equivalent or better accessibility and management arrangements.
- The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Remove the final paragraph as the above will better ensure that lost facilities will be better replaced.

(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.

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☐ /

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

☐

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

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

n/a

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

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☐ /

The Adoption of the Oldham Local Plan.



Oldham Local Plan
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Last Name	Shearer	
Job Title (where relevant)	Planning Manager	
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Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	CO2	Policies Map	
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1. Legally compliant	Yes		No	
2. Sound	Yes		No	/
3. Complies with the Duty to Co-operate	Yes		No	

Please tick as appropriate

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As in CO1 both Open Space and Sport and Recreation appear to be combined which will result in confusion as they will be assessed differently and based on different evidence bases.

Paragraph 1(and throughout) – ‘open space, sport and recreation provision’ reads as one singular provision whereas these are two very distinctive types.

Paragraph 3 – refers to ‘open space needs and deficiencies’ – does this omit outdoor sport and recreation? If so, it should clarify.

Paragraph 5 – Proposals for build sports facilities – which will include indoor sports facilities – must also be evidence based in accordance with NPPF paragraph 103. This is in the form of the Council’s Built Facilities Strategy and should be more explicitly expressed here.

Paragraph 6 – the use of the term ‘where appropriate’ introduces ambiguity, what is meant by this? New and/or improved sport and recreation provision will need to be based on the latest evidence base in the needs assessment.

Open Spaces Standards – this should make clearer that these do not apply to outdoor sport and recreation provision. Given paragraph 2 sits under this heading, it introduced confusion and ambiguity as to how the policy is applied to such site. The use of the term ‘site-by-site’ should be removed as it offers no value and proposals will be determined on their own merits in any event.

Table CO1: Current Open Space Standards – this introduces ambiguity as it could include playing field sites which should be assessed separately and to accord with the NPPF, be based on the Council’s latest needs assessment rather than applying standards.

Value Standard – if this does not apply to outdoor sport and recreation provision it should be made clear. However as stated, it could include playing field sites which should be assessed separately and to accord with the NPPF, be based on the Council’s latest needs assessment rather than applying standards.

RJ 18.22 – Accessibility for outdoor sport provision should be based on the local evidence base for where facilities are required, not a walking distance standard.

(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.

Sport England would prefer to see two separate policies for New and Improved Open Space and Outdoor Sport and Recreation Provision thereby ensuring clarity and providing the most appropriate policy wording for each. Currently CO2 is confused in terms of how each would be considered.

In addition the following should be considered:=-

Amended paragraph 5 wording:

'Proposals for built sports facilities and indoor sports provision will be supported where they are in accordance with other Local Plan policies, national planning policy and other relevant policy and guidance and based on the latest assessment of need in the borough.'

Removal of outdoor sports provision from under the heading for Open Space Standards.

Caveat introduced in Table CO1 to remove/not relate to, any outdoor sports provision/playing field sites.

Caveat introduced in Value Standard to remove/not relate to, any outdoor sports provision/playing field sites.

Footnote = Built Facilities Strategy.

RJ 18.22 amended wording:

'The accessibility standard is a measure of distance which reflects the accessibility needs of potential users of that type of open space provision. In general, smaller, local types of open spaces such as Children's Play Areas, Amenity Greenspaces, smaller Natural and Semi-Natural spaces should be accessible within a short 10-to-15-minute walk time.'

To ensure that policy wording will not result in the unnecessary loss of playing field and sports facilities.

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

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

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

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Part A

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2. Agent's Details (if applicable)

Title		
First Name	Pauline	
Last Name	Shearer	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Sport England	
Address Line 1	Sportpark	
Line 2	1<sup>st</sup> Floor	
Line 3	3 Oakwood Drive	
Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	CO3	Policies Map	
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4. Do you consider the Local Plan is:

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

Please tick as appropriate

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1 – The provision of recreational and leisure – which are likely to encompass sports provision - are included as 'community facilities' in RJ paragraph 18.35. That being the case, the policy needs to ensure that these are offered the same protection to be compatible with the NPPF. Some sites may also include playing field land therefore the policy will not provide adequate protection for such sites.

The loss of sites for recreation and leisure would therefore be supported by this policy if a-c is met. This Does not fully conform to paragraph 104 of the NPPF particularly b) as there is no requirement to 'replace' for any loss resulting from built form.

2 – The provision of any new recreation and leisure facilities should be based on the appropriate Council's evidence base in the form of a needs assessment, for indoor provision this should be the Council's Built Facilities Strategy. The policy merely requires proposals to meet points 1 & 2, which is not evidence led. As such the policy is in conflict with the NPPF paragraph 103

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

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New and improved community facilities:-

Additional requirement 3 – 'An identified local need is met.'

Loss of sites and premises:-

Additional requirement d – 'the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.'

The policy should identify if playing fields and other outdoor sports provision are included within the

'community facilities' definition in term of recreations and leisure – it is these sites that may also contain such provision that will require better policy protection.

The policy needs to ensure conformity with the NPPF paragraphs 103 and 104.

The final paragraph is not appropriate as a local plan policy and appears to be based on opinion rather than the reliance on evidence base and needs assessment, as required by the NPPF.

To provide policy wording that ensures new community facilities are appropriately evidence based.
To ensure that policy wording sufficiently protects sites and premises used for recreation and leisure where sport is provided.

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

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☐ /

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

☐

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

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Title		
First Name	Pauline	
Last Name	Shearer	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Sport England	
Address Line 1	Sportpark	
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Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	CO4	Policies Map	
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4. Do you consider the Local Plan is:

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

Please tick as appropriate

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1 – The loss of sites can include land and buildings used for recreational and leisure – which are likely to encompass sports provision – the policy refers to the need to be considered under CO3, however Sport England are concerned, for the reasons as set out under that policy reference, that there is insufficient protection offered to such sites. This policy needs to ensure that indoor and outdoor sport provision at educational sites is offered the same protection as the NPPF.

2 – The policy should be cross referenced with CO1 (when amended to provide sound indoor and outdoor sports protection).

3 – Sport England support the intent to promote shared use of facilities, but would prefer this to be more explicit within the policy wording to avoid ambiguity.

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

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Reference to CO1 as an amended version of that policy, in order to fully protect playing field and sports facilities.

Reference to CO3 New and improved community facilities:-

Additional requirement 3 – ‘An identified local need is met based on the Council’s latest assessment.’

Loss of sites and premises:-

Additional requirement – ‘the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.’

Any loss of playing field should meet the tests of Sport England’s policy and will not be supported unless the following is demonstrated:

- A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England,

that there is an excess of playing field provision in the area which will remain following the development and the site has no special significance to the interests of sport;

- The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
- The proposed development affects only land incapable of forming part of a playing pitch, nor prejudices the use of any remaining areas of playing field.
- The area lost will be replaced, prior to the commencement of development, by a new area of playing field:
 - of equivalent or better quality, and
 - of equivalent or greater quantity, and
 - in a suitable location, and
 - subject to equivalent or better accessibility and management arrangements.
- The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Both would thereby ensure compliance in broad terms with the NPPF paragraphs 103 and 104.

CO4 replacement wording of 2nd paragraph:

'Where opportunities arise through new built development and change of use, the shared use of facilities by the local community will be encouraged through planning conditions or planning obligations.'

To provide policy wording that ensures new community facilities are appropriately evidence based.
To ensure that policy wording sufficiently protects sites and premises used for recreation and leisure where sport is provided.

(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.

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Line 3	3 Oakwood Drive	
Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	IN2	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.

Sport England supports the aims of IN2 in seeking contributions for on-site or off-site facilities for sport resulting from the demand generated by a given development.

However in RJ para.20.14 the words 'outdoor and indoor sports facilities' should be included as well as open space, as this better identifies the requirement for contributions towards those facility types.

In adding this specific criteria, the policy RJ can also refer to the use of Sport England's facility calculators as a basis for establishing the required facility costs.

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

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As above.

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

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☐ /

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☐ /

The Adoption of the Oldham Local Plan.



Oldham Local Plan
Publication Plan Stage Representation Form

Ref:

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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	Pauline	
Last Name	Shearer	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Sport England	
Address Line 1	Sportpark	
Line 2	1<sup>st</sup> Floor	
Line 3	3 Oakwood Drive	
Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	IN3	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.

Sport England fully supports the Council's aims to maximise social value from development and encourages an assessment of how sport and physical activity. This has both a primary value - the wellbeing benefits that individuals experience from being active - and secondary value, which reflects the cost savings to public services like healthcare. Social value calculations are particularly important for community sport and physical activity, where lots of activity is self-organised or volunteer-led and much of its value to society comes in the form of improved wellbeing and better physical and mental health.

Our latest guidance sets out how this is done:

<https://www.sportengland.org/research-and-data/research/social-value-and-return-investment-sport-and-physical-activity>

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

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N/A

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

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Part A

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2. Agent's Details (if applicable)

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Last Name	Shearer	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Sport England	
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Line 3	3 Oakwood Drive	
Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	N2	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	

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Whilst it is understood that the whole plan should be read as one, this policy encourages BNG provisions on areas which could feasibly include playing field land. This has the potential of putting undue pressure on playing field provision and could include BNG measures which do not require planning permission, therefore little control on how and where it is done.

(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.

Include an additional avoidance clause:

Suggested added wording – “Any biodiversity enhancements on playing field land will need to meet the requirements of Sport England’s Playing Field Policy and Guidance and paragraph 104 of the NPPF.”

The policy could result in an unacceptable, nor fully assessed, loss of playing field land.

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

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Last Name	Shearer	
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Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Planning.north@sportengland.org	

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	OL4	Policies Map	
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1. Legally compliant	Yes		No	
2. Sound	Yes		No	/
3. Complies with the Duty to Co-operate	Yes		No	

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Where the Local Green Spaces as listed in Table OL1 contain playing field, the policy does not provide sufficient protection and is inconsistent with the NPPF in this regard.

The 2015 Order defines a playing field as: *'the whole of a site which encompasses at least one playing pitch.'* The definition refers to the whole of a site and does not differentiate between different types of ownership or use.

The term 'inappropriate development' is not defined as relative to playing field and outdoor sports facilities. The policy needs to define – as with CO1 – the difference between open space and outdoor sports and recreation facilities. 'Appropriate' development may still result in harm impact on/or loss of playing field.

The 'exceptions' in this policy do not conform to the requirements for sports and recreational buildings and land, including playing fields as outlined in NPPF paragraph 104.

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

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Suggested added wording to reflect the intent of Sport England's Playing Fields Policy Exception E4 and Planning for Sport Objective 'Protect' which requires replacement provision to be accessible to existing and new users within catchment. Exception E4 states:

"Any area of playing field to be lost as a result of the proposed development will be replaced prior to commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangement."

Define the term 'inappropriate development' relative to playing field and outdoor sports facilities. The policy needs to define – as with CO1 – the difference between open space and outdoor sports and recreation facilities.

Ensure the 'exceptions' in this policy include the requirements for sports and recreational buildings and land, suggested to be based on Sport England's playing field policy where that applies and more generally for sports facilities, based on the NPPF 104.

The policy could result in an unacceptable nor fully assessed loss of playing field land and/or sports facilities.

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

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From: Matthew Sobic [REDACTED]
Sent: 27 March 2026 07:30
To: SPI Consultations
Cc: [REDACTED]
Subject: Local Plan Consultation Representation - Brookhouse Group Limited
Attachments: L260327 – Local Plan Reps (Brookhouse).pdf

Good Morning,

Please see attached the above.

I would be grateful if you could confirm receipt of the representation.

Many thanks

Matt

Matthew Sobic
Head of National Retail Planning
Planning



Savills, Belvedere, 12 Booth Street, Manchester, M2 4AW



Website: [savills.com](https://www.savills.com)



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27 March 2026
L260327 – Local Plan Reps (Brookhouse)



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Economy, Skills and Neighbourhoods
Room 310, Level 3,
Civic Centre
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Oldham,
OL1 1UH

Savills (UK) Limited

Belvedere
12 Booth Street
Manchester M2 4AW

savills.com

Sent via email to: SPI.Consultations@oldham.gov.uk

Dear Sir / Madam,

CONSULTATION ON DRAFT OLDHAM LOCAL PLAN: PUBLICATION PLAN SUBMITTED ON BEHALF OF BROOKHOUSE GROUP LIMITED

Introduction

This consultation statement is submitted by Brookhouse Group Limited in response to the Draft Oldham Local Plan. The representation should be read in conjunction with the earlier representation, dated 26 August 2021, which was submitted on the Issues and Options consultation and the consultation on the Draft Plan, dated 23 February 2024.

The Council will be aware that Brookhouse is a significant stakeholder in the Oldham administrative area, owning the following commercial, service and retail locations in the Borough:

1. Failsworth centre
2. Alexandra Retail Park, Park Road, Oldham
3. B&Q, Westhulme Way, Oldham

The above locations have been developed in full support with the Council and in some cases in partnership with the Council.

Background Details

Failsworth is an allocated centre in the Council's existing and emerging development plan. These representations concern matters relating to retail policy considerations for Alexandra Retail Park and the B&Q site. Background details in relation to those two sites are as follows:

1. Alexandra Retail Park

Alexandra Retail Park is located within an area identifiable as the town centre area of Oldham. It provides approximately 10,000 sq. m of retail and leisure floorspace for a wide mix of tenants including Puregym, Matalan, Home Bargains, Iceland, JYSK and Starbucks. The site benefits from the ability to sell a wide range of retail goods including food and non-food retail goods. All of the floorspace can be used for the sale of non-food retail goods, with around 80% of the floorspace permitted to be used for the sale of food retail goods. In addition, all of the floorspace can be used for any of the other 'Commercial, Business and Service' purposes within Use Class E of the Town and Country Planning (Use Classes) Order 1987 (as amended). The permission that authorises these uses is Reference FUL/350064/22, approved on 5 July 2023.

Whilst the site is located in the area identifiable as Oldham town centre it is located at the edge of its defined boundary in the Draft Local Plan. However, it is well connected to the town centre and acts as a key retail and

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commercial location for residential areas within the town centre and the immediate surrounding residential areas.

2. B&Q, Chadderton Way

The B&Q on Westhulme Way is a 10,000 sq. m retail location located to the north of the town centre in a mixed commercial, residential and community area with both the town's hospital and football ground located adjacent to it, as well as numerous residential areas and commercial uses.

The Local Planning Authority has been supportive of a number of applications at the site supporting additional development and the widening of the range of retail goods permitted to be sold. The unit benefits from permission to be used for a wide range of non-food goods, with part permitted to be used as a foodstore. The permission that authorises this use is Reference PA/335332/14.

Representations on the Local Plan

The representations focuses on comments that we consider are required for the development plan to reflect the important role that physical retail plays in the local economy as both a service base and a large employer within the town.

Impact Assessment Threshold

We maintain our representation made in the letters of 26 August 2021 and 23 February 2024 that the impact assessment thresholds that are being adopted in the emerging Local Plan and have been included in emerging Policy C2 are not appropriate. By way of background Policy C3 intends to adopt the requirement for an impact assessment as follows:

'Proposals for centre uses outside the centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill of between 300m² gross and 1,499m² gross will be required to be accompanied by an impact assessment to determine its likely effects on all centre(s) located within the anticipated catchment area of the new development.'

Proposals for centre uses of 1,500m² gross floorspace or above, outside of one of our centres, will be required to be accompanied by an impact assessment to determine its likely effects on Oldham Town Centre and all other centres located within the anticipated catchment area of the new development.'

Firstly the wording of the Policy is drafted in a way that any proposal exceeding 300 sq. m and not located within a centre would be subject to the impact assessment as any proposal outside of those centres listed would be caught by the requirement to assess impact on those centres. That is not evidenced by the evidence base that is suggested to support Policy C3, namely the Oldham Retail & Leisure Study, published in September 2020. Therefore, if the Council were to proceed with the policy requirement, and we consider that there is not sufficient evidence to do so, a qualification to the policy would be required to determine when the impact assessment on District Centres would be required as presently, a proposal for example in Chadderton would still be required to assess the impacts of a proposal on Shaw, which would not be appropriate and would add an extra, unnecessary layer of assessment.

Importantly, we consider that the policy objective to introduce a lower than nationally set threshold for assessing impact does not meet its intended objectives and is not supported by evidence. In coming to that view, we have assessed the justification for the lower impact threshold in Paragraphs 9.7.1 – 9.7.6 of the Oldham Retail & Leisure Study.

Clearly, not all proposals have the potential to cause a significant adverse impact upon existing centres. The floorspace threshold for requiring an impact assessment, contained at Paragraph 94 of the NPPF, is 2,500 sq. m. Paragraph 94 of the National Planning Policy Framework enables Local Planning Authorities to set a proportionate, locally set floorspace threshold that is lower than the national threshold of 2,500 sq. m.

Paragraph: 015 Reference ID: 2b-015-20190722 of the Planning Practice Guidance entitled 'Town Centres and Retail' confirms that in setting a locally appropriate threshold for impact, the Local Planning Authority should consider the following:

1. Scale of proposals relative to town centres;
2. Existing viability and vitality of town centres;
3. Cumulative effects of recent developments;
4. Whether local town centres are vulnerable;
5. Likely effects of development on any town centre strategy; and
6. Impact on any other planned investment.

It follows that a reduced threshold for assessing impact should only be introduced where there is detailed and compelling evidence to show that proposals for main town centre uses less than 2,500 sq. m in out of centre locations would have the potential to cause a significant adverse impact on a centre or centres in the hierarchy.

The Retail & Leisure Study does not provide evidence to support the lowering of the threshold. There has been no material substantial new retail floorspace created in edge or out of centre locations in Oldham since 2011 when the existing development plan was adopted. In that time, it follows that the effects felt on centres from retail development have arisen as a consequence of e-commerce and not impacts from new retail developments.

We consider that this evidence demonstrates that the Local Planning Authority should be supporting efforts to promote physical retail development as a positive economic contributor to the Local Planning Authority. The effects on centres in Oldham has arisen as a consequence of e-commerce. Brookhouse as an owner of both in and non-centre retail locations in the Borough has first-hand experience of the matters that affect retail locations in Oldham.

The effects on Oldham town centre have been as a result of the movement of clothing and footwear spending online, as evidenced by the retail failures that reflect a nationwide picture. A blanket reduction in the threshold to 1,500 sq. m for proposals close to Oldham town centre, which is below the national threshold of 2,500 sq. m would therefore serve no purpose other than to add barriers to the delivery of physical retail development that is appropriate within the Oldham area and serves a valuable community facility both in terms of retail provision and employment generation.

In terms of District Centres, a reduction to 300 sq. m is not justified. District style centres are performing well and are anchored by convenience and community retail formats that are resilient to economic cycles and serve the communities within which they are situated well.

Reducing the threshold for requiring an impact assessment does not in itself mean that planning applications for main town centre uses will be refused on grounds of significant adverse impact. It merely introduces a requirement for more applications to be assessed. The purpose of the impact test is to determine whether a proposed development for main town centres use(s) would likely have a significant adverse impact upon the vitality and viability of the town centre as a whole. It is not to prevent any out of centre retail development from occurring. Adding an additional requirement to the planning process where there is no justification, only serves to add a layer of analysis that has the potential to cause delays to the delivery of sustainable development when it is not required to support an objective to support physical retail delivery.

It follows from the above that the question being considered by the Council in proposing a reduced threshold for assessing impact is; whether a proposed development of less than the national impact threshold and located outside of a defined centre could have the potential to cause a significant adverse impact on the vitality and viability of the centre as a whole. There is no evidence provided in the Retail & Leisure Study, quantitative or qualitative, which indicates that such harm could be reasonably expected to occur.

Summary and Conclusion

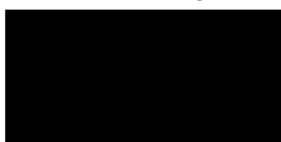
Brookhouse is a long term stakeholder in Oldham. The above representations provide suggestions for ensuring support for physical retail development, which forms a strong part of the economic base of the town.

We therefore conclude that:

1. There is no evidential basis to support a lower impact assessment threshold in the emerging Local Plan.
2. Adding a lower impact assessment threshold simply adds an unnecessary policy approach that could frustrate and development that delivers substantial economic benefits, to which Paragraph 85 of the NPPF confirms 'substantial weight' should be applied.
3. Policy C2 should be updated to remove the impact assessment thresholds and the default threshold of 2,500 sq. m for an impact assessment that is contained at Paragraph 94 of the NPPF should apply.

We trust that its comments above will be considered as part of this consultation and we would welcome the opportunity to discuss further.

Yours faithfully,



Savills (UK) Limited
Planning

cc. T Whitehead - Brookhouse

From: Planning Policy [REDACTED]
Sent: 27 March 2026 09:08
To: SPI Consultations
Subject: Response to the Oldham Local Plan reg 18 consultation
Attachments: 2026 MS and CL response to Oldham Local Plan reg 18.pdf

On behalf of my clients McCarthy and Stone and Churchill Living, please find attached a response to the Oldham Local Plan reg 18 consultation.

Please could you make sure we are added to your Local Plan database.

Thank you.

With kind regards

Natasha Styles

Senior Planning Associate

The Planning Bureau Limited

[REDACTED]
4th Floor, 100 Holdenhurst Road, Bournemouth, Dorset, BH8 8AQ, UK

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

Via email: SPI.Consultations@oldham.gov.uk

27th March 2026

Dear Sir / Madam

McCARTHY STONE & CHURCHILL LIVING RESPONSE TO THE OLDHAM LOCAL PLAN REGULATION 18 CONSULATION.

McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector.

Please find below our comments on the draft local plan insofar as they impact the delivery of specialist accommodation for older persons. These comments are intended to assist the council in formulating approaches which are both workable in practice and avoid stymying the delivery of a housing typology which the PPG describes as 'critical' in terms of addressing housing need.

Policy H3 - Housing Mix

We support policy H3 in its recognition at point 3 that the developments for specialist accommodation, such as for older and/ or disabled people will have an alternative housing mix to that detailed within the policy.

Policy H5 - Affordable Housing and Policy H4 - Providing for Local Housing Needs

We note that that policy H5 supports the delivery of new specialist accommodation and supported housing, including Age-restricted general market housing, Extra Care Housing, Sheltered Housing/ Assisted Living; and Nursing and Care Homes.

Policy H4 then states that '*Specialist housing provision of 10 homes and above are expected to provide affordable housing, in line with Local Plan Policy H5*'.

As there is no other detail within Policy H5, it is assumed that this requires specialist housing to deliver affordable housing in line with mainstream housing. H5 sets a variable affordable housing requirement of 20% on brownfield sites and 25% on green field sites in the high value area and 10% on all sites in Low Value areas.

We note that the Oldham Local Plan Viability Assessment, December 2025, Aspinall Verdi has not tested specialist housing for older people as a typology. Given that the one scheme tested with houses and flatted development (rather than just houses) within this Viability assessment has been found to not be viable as confirmed in para 8.24 of the Viability Assessment that states '*For the 100-unit scheme, which tested houses and flats at 50 dph, there is no sensitivity scenario that would make the scheme viable*', we would advocate that that if specialist housing for older people were to be tested within this study, the typology would be found to be even less viable than the scheme tested with flatted development and with such an outcome the plan should then seek to exempt specialist housing for older people from affordable housing

to ensure that such specialist schemes are delivered, especially given the large need for this typology and the requirements of the Viability PPG.

To clarify our position, the Council should note that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing. Specialist housing schemes for older people are different to mainstream housing and tend to be flatted developments based around communal facilities and community living and delivered on smaller sites. Older persons housing therefore differs from a standard model of development because, as confirmed within the PPG (Paragraph: 010 Reference ID: 63-010-20190626) it generally has additional facilities such as extensive communal areas, such as space to socialise, a wellbeing centre as well as a care service with 24 hour access to support services and staff, meals are also often available. This enables residents to live much more independently than they would otherwise. However, the facilities do take up floorspace and there are other additional costs which make the viability of such schemes much more challenging. This is all in addition to facilities provided in a mainstream flatted scheme and makes scheme even less viable.

If the council decided to test older persons housing for viability and affordable housing, we would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note') available from <https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf>. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values.

Once the older people's housing typology has been tested through the Viability Assessment and if it is found to be substantially unviable, requiring such sites to in effect, go through a Viability Assessment at the application stage is contrary to national policy and instead an exemption should be provided within policy H5. This approach would also be consistent with other Council's Local Plans. For example, Swale, Charnwood, Fareham, Hyndburn, Birmingham, Teignbridge, North Norfolk, Leicestershire, Dudley, Great Yarmouth, Rugby and East Suffolk, based on detailed viability evidence have adopted Local Plan's or at the later stages of plan preparation (Main mods) that exempts older people's housing schemes from affordable housing. Fareham's also exempts older persons housing from their Community Infrastructure Levy charge. As such the following wording should be introduced to the policy.

Any affordable housing requirement for older people's housing would therefore create an unrealistic, over aspirational policy requirement that will undermine deliverability. The plan as written, will not deliver much needed older peoples housing in line with need without further viability assessment and is therefore not justified or effective.

We are also of the view that given the large need or older persons housing identified in paragraphs 8.30 to 8.32 of the draft plan and that at para 8.31 identifies a substantial need for 3,138 specialist older persons dwellings over the plan period or 165 a year, that the exemption to affordable housing for specialist housing should not need to be based on need for older persons housing, as this need is already well established. We would therefore recommend that point b of H5 is amended as follows:

b) that provide specialist housing to meet local housing needs.

Policy IN2 – Planning Obligations

Policy IN2 requires a clawback mechanism to be incorporated into legal agreements where appropriate in such instances where a site specific viability assessment is submitted to justify a lower rate of planning obligations than the policy compliant level.

Paragraph: 010 Reference ID: 10-010-20251216-of the government guidance on Viability states the following:

'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.'

In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509. A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism and detail within it that sits within a planning obligation needs to be considered and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. The plan currently does not do this.

In addition, for a large or multi-phase development which will be delivered over a long period it makes sense to check whether a scheme's viability has changed with market movements. However, for a small single phased site, such as a much needed older persons housing scheme that is built in one phase, the Inspectorate have repeatedly noted that review mechanisms are unnecessary. For example, under Appeal decision reference APP/C4235/W/120/3256972 dated 1st April 2021, the Inspector noted in paragraph 17 that *'as the development would almost certainly be completed in a single phase with an estimated build time of 12-18 months, it is not the sort of large multi-phased scheme where stronger arguments for a review/clawback mechanism may otherwise exist'*.

The acknowledgement that review mechanism should only apply to larger schemes is also being recognised by Local Plan inspectors. For example the Local Plan Inspectors report for the Amber Valley Local Plan requires a main modification to the plan that makes it clear that the review mechanism policy only applies to large schemes. This is introduced to make the plan more effective and provides certainty. The inspector concluded as follows. :

170. The final section of the policy addresses the use of review mechanisms for Section 106 agreements. To provide certainty, and thus the effectiveness of the policy, it is necessary for MM55 to amend the wording so that it clarifies that this relates to larger sites that will come forward over a longer period of time, and not all proposals.

Therefore, if a review mechanism is to be introduced the detail within any review mechanism needs be published so it can be fully assessed through the Local Plan process, this must also include an exemption for single phased schemes as repeatedly noted by the planning inspectorate.

The following wording should therefore be incorporated into policy IN2.

- **Single-phased development schemes will not be subject to a review mechanism.**

Policy IN3 - Delivering Social Value and Inclusion

Policy IN3 requires applications for major development to be supported by a Social Value Strategy. Much needed older Persons' Housing produces a large number of significant benefits which supports local residents and vulnerable older people. Older persons housing delivers inclusive and accessible environment for elderly people that promotes opportunity for good physical and mental health whilst combatting loneliness. This is integral to older persons housing schemes and is all detailed within planning statements supporting schemes delivering older persons housing.

In addition, older persons housing schemes can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources and greatly adds to Social Value and inclusion.

A report “‘*Healthier and Happier*’ An analysis of the fiscal and wellbeing benefits of building more homes for later living” by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- ‘Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.’

In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder.

Given the above and the large need for older persons housing in Oldham, we feel that an exemption should be provided to older persons housing scheme to having to provide a social value strategy.

Recommendation:

For the plan to be in line with national policy and effective the following wording should be added to para 2 of the policy to recognise the health benefits of older persons housing.

Specialist Housing for older people has a number of social benefits and proposals for such schemes will not be required to submit a Social Value Strategy.

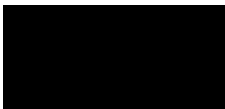
Policy N2 - Restoring Nature

We support the policy in its requirement for a minimum of 10% BNG however, the Council should also reconsider the additional wording it proposes with regard to BNG to ensure the policy is in line with the guidance and statutory instruments that the government have recently updated / published regarding statutory Biodiversity Net Gain. The Council should then amend the preferred options so that it is consistent with any updated guidance and regulations.

- Reconsider the additional policy wording to ensure it is consistent with recently published legislation and planning guidance.

Thank you for the opportunity for comment.

Yours faithfully



Natasha Styles
Senior Planning Associate

From: Edward Taylor [REDACTED]
Sent: 27 March 2026 23:43
To: SPI Consultations
Subject: Comments on the Reg 19 Local Plan - CPRE Lancashire, Liverpool City Region and Greater Manchester
Attachments: Oldham Local Plan Reg 19 Form CPRE Lancashire, Liverpool City Region and Greater Manchester.rtf

Please find attached the comments on the Reg 19 Draft Oldham Local Plan
- CPRE Lancashire, Liverpool City Region and Greater Manchester

regards

--

Edward Taylor (MRTPI, MCD, MA Urban Design)
Planning Director CPRE Lancashire, Liverpool City Region and Greater Manchester



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*

2. Agent's Details (if applicable)

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

Title	Mr	
First Name	Edward	
Last Name	Taylor	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Lancashire, Liverpool City Region and Greater Manchester	
Address Line 1	c/o Rushtons Accountants	
Line 2	Shorrock House	
Line 3	1 Faraday Court, Fulwood, Preston	
Line 4		
Post Code	PR2 9NB	
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Lancashire, Liverpool City Region and Greater Manchester

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

Paragraph		Policy	Policy H2 - Density of New Housing	Policies Map	
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4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

The policy is generally welcome but the indicative minimum densities are based on those in Places for Everyone which was adopted before the latest draft NPPF which has greater emphasis on promoting density. In urban areas, especially near to public transport nodes, the policy should through good urban design encourage higher densities than the minimum wherever appropriate so as to make more efficient use of land, improve viability of services including public transport, promote active travel and reduce pressure on the green belt.
(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.

It is important in making the most efficient use of land, to achieve appropriate densities on residential developments. In line with PflE Policy JP-H4, new residential developments should achieve the minimum densities set out in Table H2 below but in urban areas, especially near to public transport nodes, higher densities will be supported where they are well designed and appropriate taking into consideration housing needs, local character and appropriate building forms and can be achieved without causing harm to amenity.

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

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Lancashire, Liverpool City Region and Greater Manchester

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

Paragraph		Policy	Policy OL2 - Oldham's Green Belt	Policies Map	
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4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

The section of the policy that addresses stables states that “the Council will have regard to the design, layout, and form of construction of any buildings to assess the suitability for stabling purposes.” Lighting should be explicitly mentioned as some stables are often very brightly lit and this can cause harm to wildlife and amenity.

(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.

Suggested wording: “....the Council will have regard to the design including lighting scheme with consideration of its impact on wildlife and amenity, layout, and form of construction of any buildings to assess the suitability for stabling purposes.”

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

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Lancashire, Liverpool City Region and Greater Manchester

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

Paragraph		Policy	Policy D1 – Achieving High Quality Design	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.

9 incorporate appropriate landscaping and urban greening, such as green roofs, green walls, trees and shrubs and support nature through the incorporation of wildlife-friendly features (such as nest boxes) and integration with the nature recovery network; is generally positive but more could be said about encouraging and preserving local biodiversity.

In urban areas, especially near to public transport nodes, the policy should recognise that where appropriate and taking into consideration housing needs, local character and appropriate building forms, high quality urban design can enable higher densities and mixing of uses such as ground floor non-residential uses with residential above so as to make more efficient use of land, improve viability of services including public transport, promote active travel and reduce pressure on the green belt.

(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.

... Development proposals, where applicable, should through their design:

9 incorporate appropriate landscaping and urban greening, such as green roofs, green walls, trees and shrubs and support nature through the incorporation of wildlife-friendly features (such as nest boxes), integration with the nature recovery network and the preservation and enhancement of local biodiversity.

14 in urban areas, especially near to public transport nodes, where appropriate and where they can be achieved without causing harm to amenity and taking into consideration housing needs, local character and appropriate building forms, enable higher densities and mixing of uses such as ground floor non-residential uses with residential above so as to make more efficient use of land, improve viability of services including public transport, promote active travel and reduce pressure on the green belt.

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

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Lancashire, Liverpool City Region and Greater Manchester

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

Paragraph		Policy	Policy T2 – Travel Hubs and Park and Ride Facilities	Policies Map	
-----------	--	--------	---	--------------	--

4. Do you consider the Local Plan is:

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

Please tick as appropriate

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

Park and Ride Facilities can reduce car journeys but generally tend to do so only when they are located near to journey origin such as a residential area (remote P&Rs) rather than when located close to their destination (peripheral P&Rs) such as a town centre. A study published in the Journal of Transport Geography (Volume 30, June 2013, Pages 7-16, Transport and environmental effects of rail-based Park and Ride: evidence from the Netherlands, Giuliano Mingardo) states that 'large differences have been found between the net impact of P&Rs according to their function: remote P&Rs perform better than peripheral P&Rs'

A study (Dijk, M. and Parkhurst, G. (2014) Understanding the mobility-transformative qualities of urban park and ride policies in the UK and the Netherlands. International Journal of Automotive Technology and Management, 14 (3/4). pp. 246-270.) showed that policy to support P+R is not straightforward but full of potential counter effectiveness. It needs an integrated policy approach to transport, encompassing (restricted) car use, (improved or improved access to) public transport, walking and cycling etc. and must be based on an integrated understanding of travel behaviour, infrastructures, operators and policy.

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

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

The Council will support schemes for new and improved travel hubs and remote P&R park and ride facilities locations as opposed to peripheral ones where it can be demonstrated that the proposed facility:

1. forms part of a wider strategy for increasing the use of public transport and active travel based on an integrated understanding of travel behaviour including infrastructures, operators and policy including restricting car use and improving access to public transport, walking and cycling and regulating any unintended effects, especially improper use etc. and has been developed in conjunction with Transport for Greater Manchester and, where appropriate, other organisations such as Highways England and Network Rail. The use and impact of the facility should be regularly monitored.

(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:

☒

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.