

Oldham Council's Response to the Planning Inspectorates Response to the Oldham Local Plan Pre-Examination Checklist received 23 July 2026

Dated: 14 August 2026

The Pre-examination Checklist for the [Oldham Local Plan](#)¹ was submitted to the Planning Inspectorate on 22nd July 2026.

The Planning Inspectorate responded to the Pre-examination Checklist on 23rd July 2026, recommending that the Council address the matter set out in an attached Annex prior to submitting the Oldham Local Plan for examination.

The completed Pre-examination Checklist for the Oldham Local Plan and full Planning Inspectorate response and Annex can be found at the council's Oldham Local Plan [Submission webpage](#).

This note forms the Council's response to the Planning Inspectorate's recommendation and has been published alongside the Plan and other submission and supporting documents.

Planning Inspectorates Recommendation

When the Oldham Local Plan ('the Plan') is submitted for examination, the Council should provide a clear explanation as to why it considers it is not necessary for the Plan to contain site allocations to ensure that planning policies in Oldham identify a supply of specific, deliverable sites for five years following the intended date of adoption and specific developable sites or broad locations for growth for the subsequent years 6-10 and, where possible, for years 11-15.

Response

As set out in the Plan and supporting documentation (including the [Setting the Scene Topic Paper](#)² (paragraphs 6.14 and 6.15)) the role and purpose of the Oldham Local Plan has changed since preparation of, and consultation on, the [Draft Local Plan](#)³. In particular, allocations for housing and employment development are no longer being proposed. The focus of the Oldham Local Plan is instead on 'non-strategic' development management policies which will support delivery of PfE in Oldham, as well as our local priorities and regeneration ambitions.

¹ This document can be found online at https://www.oldham.gov.uk/downloads/download/2476/oldham_local_plan_publication_plan_main_document

² This document can be found online at https://www.oldham.gov.uk/downloads/file/8338/setting_the_scene

³ This document can be found online at https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan

In summary, the main reasons for the change in focus for the Oldham Local Plan are that:

- [Places for Everyone Joint Development Plan](#)⁴ (PfE) is now in place (following its adoption in March 2024). It now forms part of our development plan and provides us with a suite of policies that set the strategic planning framework for the Borough, including the Borough's housing requirement and strategic allocations. As part of the development plan for the Borough regard must be had to the policies within PfE when preparing and assessing development proposals. It is therefore unnecessary to repeat strategic planning matters addressed through PfE, and it would be unhelpful to do so and lead to ambiguity.
- Since preparation of the Draft Local Plan changes in national planning policy have taken place and the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2026](#)⁵ have come into force, introducing a new-style plan making system. It is also expected that Spatial Development Strategy (SDS) regulations will be published around October 2026. Although formal plan making on the SDS cannot yet take place until regulations are in place, the GMCA (the Strategic Planning Authority for the Greater Manchester area) is undertaking preparatory work on potential SDS policies, SDS evidence base requirements and engaging with partners across Greater Manchester, including the 10 local authorities of Greater Manchester. The Council therefore acknowledge that, at some point in the near future, a new-style plan will need to be prepared. This will necessitate the inclusion of housing allocations, as appropriate. However, given that the Council's [Core Strategy and Development Management Development Plan Document](#)⁶ was adopted in November 2011 there is a need for 'local-level' non-strategic policies to bring our development management policies up to date, complement those in PfE and reflect the Borough's priorities and regeneration ambitions. As such, the Council has continued to prepare the Oldham Local Plan under the transitional arrangements set out in national planning policy that requires 'old-style', or 'legacy', plans to be submitted for examination by December 2026.

PfE (Table 7.1) summarises the housing land supply up to 2039 and for Oldham identifies an existing supply of potential housing sites adequate to meet our overall identified need. This includes a 15% buffer (of dwellings) for flexibility and market

⁴ This document can be found online at <https://www.greatermanchester-ca.gov.uk/media/azeptwds/places-for-everyone-joint-development-plan-document.pdf>

⁵ This document can be found online at <https://www.legislation.gov.uk/ukxi/2026/186/contents/made>

⁶ This document can be found online at https://www.oldham.gov.uk/info/201229/current_local_planning_policy/978/joint_core_strategy_and_development_management_policies_development_plan_documents_dpds

choice (accounting for sites within the housing land supply not coming forward as anticipated).

The scale and distribution of housing to be delivered is then set out in PfE at Policy JP-H1, and Table 7.2 sets out the minimum number of net additional dwellings each district is expected to identify a sufficient supply of sites for through their local plans. Paragraph 11.3 of PfE also states that *‘As appropriate, district Local Plans will allocate sites from this supply [...] to ensure that the spatial strategy can be met’*.

As the focus of Oldham’s Local Plan is on non-strategic development management policies that will support delivery of PfE at a local level and having regard to the term *‘as appropriate’* at paragraph 11.3 of PfE, the Council has concluded that in this instance it is not necessary to include individual housing allocations as part of the Plan.

Evidence of the Borough’s housing land supply being sufficient to meet our needs, and its deliverability over the plan-period, is provided in the [Housing Topic Paper](#)⁷ (see paragraphs 4.6 to 4.13) and [Appendix 1 of the Housing Topic Paper](#)⁸. The [Strategic Housing Land Availability Assessment](#)⁹ (SHLAA) sets out Oldham’s housing land supply and is a key evidence base document informing the Local Plan and demonstrates how we intend to meet our housing requirement.

Oldham’s housing land supply (as at 1 April 2025), set out within the SHLAA, identifies land to accommodate 12,364 homes over the plan period and beyond. Looking at the plan period (2022-2039) specifically, 1,401 homes have been delivered between 2022/23 and 2024/25 (see Table 3 of the Housing Topic Paper). This leaves at least 10,159 homes to be delivered over the remaining plan period (2025/26 to 2038/39) to meet our overall housing requirement. The identified housing land supply (as at 1 April 2025) identifies approximately 11,858 homes within the remaining plan period and is capable of meeting our remaining minimum housing requirement, whilst providing an additional 1,699 homes.

Oldham’s housing land supply identifies a range of sites, including large sites, smaller sites, and sites appropriate for change of use / conversion (e.g. mills). The PfE strategic allocations also support the delivery of a large number of homes in our land supply. Whilst a large portion of the housing land supply is made up of sites which currently do not have an extant planning permission or are not under construction, these sites have undergone a site assessment as part of the SHLAA to determine the suitability, availability and achievability (including economic viability). Appendix 1 provides further

⁷ This document can be found online at <https://www.oldham.gov.uk/downloads/file/8334/housing>

⁸ This document can be found online at https://www.oldham.gov.uk/downloads/file/8341/housing_appendix_1

⁹ This document can be found online at https://www.oldham.gov.uk/info/201230/monitoring/2134/strategic_housing_land_availability_assessment_shlaa

detail on the deliverability of sites that make up the housing land supply. This includes a summary of the desktop assessment carried out; details on the short, medium and long term supply; and the anticipated housing land supply for the years following the anticipated adoption of the Local Plan (2027/28 onwards).

The Council's decision not to allocate sites as part of the Oldham Local Plan has been raised and discussed at two separate advisory visits with representatives from the Planning Inspectorate, one on the 12th August 2025 (a joint visit held with the other eight PfE authorities) and one just for the Oldham Local Plan on 13th August 2025.

Advice from the Planning Inspectorate to the nine PfE Authorities as part of the joint advisory visit, stated:

'PfE includes allocations that meet some of the Councils' needs. It also includes the specific requirements to be "taken forward" in DPDs (at paragraph 1.26), with Policy JP-H1 expecting each district "to identify a sufficient supply of sites through their local plans", with allocations "as appropriate" (paragraph 11.3). Similarly, the Framework expects that planning policies should identify a sufficient supply and mix of sites. My reading of these things, taken together, is that they do not mandate the DPDs to make allocations to meet all the residual needs identified in PfE.'

Some Councils are not intending to allocate any sites in their Plans, for various reasons, including relating to the overall effectiveness of the Plans and in terms of the Framework's expectations that plans should be succinct. Others are allocating some sites but not aiming to meet residual needs in full through this process. Still others have looser area-based policies that nevertheless include anticipated development quanta. The tasks for all of the plans will be how a sufficient supply and mix of sites are identified in planning policies, and how evidence relating to deliverability and/or developability (for the purposes of the Framework Glossary) could be presented effectively. These tasks are perhaps trickier, though not unachievable, for plans without allocations. Whichever course is taken, the scope of plans should be clearly set out in the Councils' LDSs (per s15 of the 2004 Act) with reference to the PfE expectations for successor DPDs, and this could usefully clarify whether they intend to include allocations. Councils should also consider the justification for whatever approach is taken and articulate this clearly, particularly where plans are not looking to allocate sites. '

Further advice was then provided by the Planning Inspectorate in response to the advisory visit specific to the Oldham Local Plan. This acknowledges that the Plan *'is being prepared to implement the strategy and objectives set out in Places for Everyone (PfE). Based on the discussion and evidence presented during the visit, the overall approach appears reasonable and coherent.'*

It was recognised that the Council is not proposing to allocate sites for housing (or employment) within the Plan, underpinned by two key considerations:

1. There is an urgent need to update the Development Management policies, many of which are now over 12 years old and need to be updated to reflect current planning practice or policy context.
2. The Council is confident that the housing sites allocated through PfE plan, alongside those identified in the Brownfield Register and Strategic Housing Land Availability Assessment (SHLAA), provide a sufficient and deliverable supply to meet the Borough's housing needs over the PfE plan period.

With regards to the Council's [Local Development Scheme](#)¹⁰, published 4 March 2025, this sets out the 'Role and Content' of the Oldham Local Plan' as being as follows:

'The Oldham Local Plan will be prepared in conformity with the NPPF and Places for Everyone. As a Part 2 Local Plan to Places for Everyone it will deal with matters at the local level, setting out the spatial vision, strategic objectives and strategy for Oldham.

It will cover planning policies and site allocations, where they provide additional policy direction for Oldham, in relation to: sustainable development; natural environment; housing; economy and employment; green belt and other protected open land; design, built environment and heritage; retail and town centres; transport and accessibility; climate change and flood risk; communities, health and well-being; infrastructure; open spaces, sports and recreation; and safeguarded land.

The Oldham Local Plan will be accompanied by an updated Policies Map (see profile below).'

The Council acknowledge that reference is made to the inclusion of allocations within the Oldham Local Plan '*where they provide additional policy direction for Oldham...*'.

However, for the reasons set out above, the Council consider that, for the purposes of the Oldham Local Plan and given its focus on non-strategic development management policies, allocations in this instance are not required to provide additional policy direction for the Borough.

Conclusion

Overall, the Council considers for the reasons set out above it is not necessary for the Oldham Local Plan to contain site allocations and that it provides a reasonable basis for supporting the delivery of sustainable housing land within Oldham. Collectively, it is considered the strategic policies set out in PfE and the non-strategic policies in the Oldham Local Plan will provide a robust planning framework for the future development and regeneration of the Borough.

¹⁰ This document can be found online at https://www.oldham.gov.uk/info/201231/emerging_planning_policy/230/local_development_scheme_timetable