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Your Ref: Pre-examination checklist
Our Ref: PINS/W4223/429/9
Date: 23 July 2026

Dear ████████,

Oldham Local Plan: matters to address before submission for examination

Thank you for completing the pre-examination checklist which we received on 22 July 2026.

Based on the answers that you provided to the checklist questions and a review of the explanations for some of the answers and relevant parts of documents referred to, I recommend that you address the matter set out in the attached Annex before submitting the Oldham Local Plan for examination.

Once you have addressed the matter I have identified, I suggest you submit the Plan and other documents under regulation 22 as soon as possible. We will then seek to appoint an examining Inspector (or Inspectors) in accordance with the timescales set out in the Service Level Agreement.

The completed checklist that we received on 22 July 2026, this letter and Annex, and your written response to my recommendation should be published on the examination website in due course along with the Plan and other submission and supporting documents.

Please note that this is not an assessment of whether the Plan satisfies all relevant legal requirements and is sound as that will be determined by the examining Inspector(s) who will take account of all the Council's evidence, representations made under regulation 20, and any further information gathered during the examination. It is also possible that the examining Inspector may have concerns about procedural matters, the scope of the plan, or evidence that I have not identified from the pre-examination checklist.

Yours

William Fieldhouse

Inspector

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Oldham Local Plan: recommended action before submission

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 **[CR1]**.

Whilst I am not recommending any further action prior to submission, I would suggest that the Council be prepared to respond positively to any potential questions from the examining Inspector(s) about how the Plan may need to be modified so that its policies, along with those in the Places for Everyone Joint Development Plan Document, identify a sufficient supply of deliverable and developable sites.

Reason for recommendation

Policy H1 in the Plan states that at least 11,560 homes are required in the borough between 2022 and 2039 and supports residential development in certain defined circumstances. The Regulation 22 Consultation Statement (page 36) advises that the Plan does not include site allocations because “Oldham’s identified land supply (including strategic allocations in Places for Everyone) is capable of meeting our requirements”.

Paragraph 8.7 in the Plan states that the strategic land availability assessment and brownfield register provide details of sites considered suitable, available and achievable for residential development, and should be used as a starting point to identify potential development sites.

Places for Everyone Table 7.1 indicates that Oldham’s allocations in that plan have capacity for 2,105 homes. That suggests that further sites with a combined capacity for over 9,400 homes need to be identified to meet Oldham’s requirement for at least 11,560 homes. Places for Everyone policy H1 states that the delivery rates in Table 7.2 (11,560 for Oldham) are 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 states that district local plans will allocate sites from the existing supply identified in land availability assessments that are updated annually (my emphasis).

NPPF (2024) paragraph 15 states that the planning system should be genuinely plan-led. Paragraph 72 states that planning policies should 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 (my emphasis).

A Plan that relies on a strategic land availability assessment and brownfield register to identify sites to meet its housing requirement would not seem to be consistent with national policy or Places for Everyone.