

AshtonHale

Representations to Oldham Council's
Saddleworth Neighbourhood Plan
Regulation 16 Consultation

Saddleworth Business Centre

July 26

Executive Summary

These representations are submitted on behalf of Saddleworth Property Partnership (hereby referred to as “SPP”) in respect of land interests at Saddleworth Business Centre, Delph, Oldham (“the Site” or “SBC”).

SPP supports the objective of delivering sustainable growth across Saddleworth but considers that the Neighbourhood Plan should adopt a flexible policy framework to enable appropriate brownfield redevelopment opportunities to come forward where supported by evidence. In particular, the Plan should not unnecessarily constrain the redevelopment of sites that are no longer suitable or viable for their existing use.

SBC represents such an opportunity. Although currently occupied, the site is constrained in operational terms, most notably by access arrangements which are unsuitable for modern commercial or industrial uses, particularly those involving HGV movements. In addition, the site is now isolated from the wider employment area and instead sits within an established residential context. Continued employment use therefore, gives rise to amenity conflicts and does not represent an effective or sustainable use of land. SBC represents a highly sustainable and deliverable opportunity for residential development. The site is previously developed land, located within an accessible location, with strong access to services, facilities and public transport. It is therefore ideally suited to contribute towards the borough’s housing needs.

The redevelopment of the site for residential use would deliver clear benefits to the surrounding residential environment. This includes improved highway safety for neighbouring occupiers sharing the site access, and a more compatible relationship with adjacent dwellings, particularly those backing onto the existing mill building, which are currently affected by the impacts of commercial activity.

SPP therefore supports amendments to the Neighbourhood Plan that provide greater flexibility in relation to housing delivery, the retention of employment land and masterplanning requirements, ensuring that site-specific evidence relating to viability, deliverability and sustainability can be given appropriate weight. Such changes would better align the Plan with national planning policy and facilitate the regeneration of suitable brownfield sites such as SBC.

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Document Details

Report title: Representations to Oldham Council's Saddleworth Neighbourhood Plan Consultation

Prepared by: CO'D

Status: Final

For and on behalf of AshtonHale Limited

1 Introduction

- 1.1 These representations have been prepared by AshtonHale Ltd on behalf of Saddleworth Property Partnership (hereby referred to as “SPP”) in response to the Saddleworth Neighbourhood Development Plan Regulation 16 Consultation.
- 1.2 These representations are made in relation to the SPP’s interest at Saddleworth Business Centre (“SBC”, or “the site”). SBC contains a mix of industrial, warehouse and leisure uses within Delph, Oldham. The site itself comprises a mix of employment uses contained within a former mill building that has been significantly extended, altered and subdivided to form a business centre, together with associated access roads and circulation areas.
- 1.3 A plan showing the SPP’s land interests is attached at Appendix I.
- 1.4 These representations intend to cover the following:
- A background to the SPP’s interests at Saddleworth Business Centre;
 - The case for housing delivery at the Saddleworth Business Centre site in relation to the policies contained within the Regulation 16 Neighbourhood Plan;
 - SPP’s proposed modifications to the Neighbourhood Plan.

2 Background to Representations

Site Summary

- 2.1 Saddleworth Business Centre is entirely under the ownership of Saddleworth Property Partnership, who seek to promote the site for alternative residential use.
- 2.2 Saddleworth Business Centre site is located approximately five miles east of Oldham Town Centre and around nine miles from Junction 20 of the M62 Motorway. It is bounded by Huddersfield Road (A62) to the south and the A6052 to the east within Delph. To the west, the River Tame forms a strong physical and visual boundary between Saddleworth Business Park and the wider Valley Mills employment area beyond. Land to the east of the River Tame is predominantly residential in character, with residential development surrounding the site to the north, east and south.
- 2.3 The eastern and northern boundaries of the site are characterised by existing residential development, including more recent housing at Bakestones Avenue, which was allocated in the adopted Development Plan. Immediately to the north of SBC is a 10 unit residential development constructed on the site of a former office building, which shares access with the business centre (Application Ref: PA/335254/14). Beyond the site's immediate boundaries, development to the north, east and south is predominantly established residential in nature, which serves to further isolate SBC from the Valley Mills employment area and embed it within a residential context.
- 2.4 Access to the site is taken from Huddersfield Road via a shared access arrangement, which also serves the adjoining property to the east and Riverside Court offices to the west. This access is additionally shared with residents of the recently completed residential development located to the rear of the site.
- 2.5 The site extends to approximately 0.87 hectares and comprises previously developed land associated with the operations of Saddleworth Business Centre.
- 2.6 A three storey former mill building is located on the site, constructed in solid brick with stone window heads, UPVC windows and a timber-framed, slate-clad roof. The building is arranged over ground, first and second floors and is now largely used as small business centre style office accommodation.
- 2.7 The central section of the site comprises a mixture of premises with steel trussed roofs, open yard areas used for car parking, and office and storage accommodation at ground and first-floor level. A substantial retaining wall forms the rear boundary of this area and retains land associated with the adjacent residential development.
- 2.8 The most modern section of the site consists of partly steel portal-framed buildings, with open yard areas to the rear and covered car parking provision.
- 2.9 Occupation levels at the site are currently high, however for reasons set out below, the ongoing operation of the site in its current form is not financially viable.

Site Aspirations

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

Key Site Considerations

Highways and Accessibility

- 2.14 The Site, located to the south of Delph Village, has strong connections to local services and facilities. The Site lies adjacent to the A62 (Huddersfield Road), connecting the Site to key locations such as Oldham town centre (c. 15-minute drive), Rochdale (c. 25-minute drive) and Huddersfield (c. 30-minute drive).
- 2.15 Furthermore, the Site is situated in proximity to both north and southbound bus stops along the site boundaries, across The Sound and Huddersfield Road. These are served by the 350, 356, 825, 826, and S350A services, providing access to Oldham, Ashton-under-Lyne and Moorside. Greenfield train station is located c.3km to the south of the Site, providing services to strategic locations such as Manchester Piccadilly, York, and Huddersfield. The no. 350 and 356 bus services stop at Greenfield train station. The typical bus journey time from the Site to the train station using these bus services is c. 12 minutes.
- 2.16 The existing site access has no footways and narrows to approximately 3.5 m at its tightest point. This is not suitable for commercial use and is especially inadequate for HGV access, which requires a minimum width of 6.5 m plus at least one 2 m-wide footway, as set out within the Site representations. While there may be scope to upgrade the access for lower intensity uses, such as residential development, it cannot be feasibly adapted to provide a safe and compliant commercial access.
- 2.17 As a result, the current access is not appropriate for the site's existing employment function and is unlikely to accommodate any intensification or redevelopment of the site for employment purposes. Any future redevelopment of SBC for industrial or

commercial purposes would therefore be unacceptable in terms of access and highways requirements and would also lead to significant additional amenity impacts for neighbouring users.

- 2.18 It is also important to recognise that the site access is shared with a recently completed residential development to the north of the site. The continued use of this access to serve employment uses, particularly those generating HGV movements, gives rise to potential conflict with residential traffic, pedestrians and general activity associated with the adjoining dwellings. The redevelopment of the site for residential use would significantly reduce the intensity and nature of vehicle movements associated with the site, removing regular HGV activity.

Heritage

- 2.19 There is no designated heritage assets associated with the site or within the curtilage of the site boundaries. There are a number of Grade II listed buildings within 0.5km of the site, and one Grade II* listed building. The closest heritage assets are located outside the southern boundary of the site, adjacent to Huddersfield Road (A62). These include the Old Bell and Bell House which are Grade II listed brick buildings, and the New Delph Conservation Area which sits at the southern boundary of the site and encompasses the existing access road.
- 2.20 Replacing the existing employment use with a sensitively designed residential development offers the potential to positively enhance the area's residential character, while also preserving, and where possible improving, the setting of the New Delph Conservation Area and the adjacent Listed Buildings.

Ecology

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

Flood Risk and Drainage

- 2.22 The Environment Agency Flood Map for Planning identifies areas of potential flood risk within and around the Site. A Flood Risk Assessment was carried out at the site in October 2022, including the procurement and review of Environment Agency flood risk data against detailed topographical site survey information.
- 2.23 It is proposed that a similar process will be undertaken at the site with a new Flood Risk Assessment to be produced to support a planning application.

Services and Amenity

- 2.24 All necessary services and utilities are located within close proximity to the Site's boundary. Amenities in proximity to the Site have been summarised below:
- Co-op Food, King Street: c. 0.1 mile from the Site
 - Albion Farm Shop & Café: c. 0.9 miles from the Site

- Tesco Superstore, Chew Valley Road: c. 2.8 miles from the Site
- Asda Superstore, Greenfield Lane: c. 4.1 miles from the Site
- Old Bell Inn public house, Delph: c. 0.1 mile from the Site
- Bulls Head public house, King Street: c. 0.1 mile from the Site
- Swan Meadow Nursery, Church Street: c. 0.4 miles from the Site
- Delph Primary School, Denshaw Road: c. 0.5 miles from the Site
- Saddleworth School, Huddersfield Road: c. 1.6 miles from the Site.

2.25 In addition, a number of existing residential properties directly adjoin the site and back onto the existing three storey mill building. The current employment use has the potential to give rise to amenity impacts for these residents, including noise, disturbance, servicing activity, and general comings and goings associated with commercial operations. The close proximity of residential development also creates practical constraints in relation to the safe maintenance and upkeep of the existing building. This is particularly relevant where repairs, scaffolding, access for contractors and servicing works may need to be undertaken in close proximity to neighbouring gardens and dwellings, increasing the potential for disturbance and making the continued commercial occupation of the building more difficult to manage in practice.

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

3 Policy and Evidence Review

- 3.1 The following Chapter sets out the SPP's key views and comments on the draft Saddleworth Neighbourhood Plan (2025-2045). SPP have not commented on every policy set out in the document, only those considered particularly relevant to their interests at SBC. The absence of comment to any further policies should not be construed as the SPP agreeing with the approach taken.
- 3.2 SPP note that the policies contained within the draft Neighbourhood Plan should be read alongside Oldham's adopted Development Plan which includes Places for Everyone Plan (adopted 2024), Oldham Local Plan (adopted 2011), and the Peak District National Park Local Plan (adopted 2019).

Housing

Policy 15: Housing

Development will be supported which delivers a range of housing types, with specific focus on the provision of affordable, social and intermediate housing. In particular, preference will be given to developments which include one-bedroom accommodation targeted at young people, allowing those leaving family homes for the first time to remain in the area, and appropriate homes for the elderly and disabled, which promote accessibility. Individual developments which fit those needs will also be looked upon favourably

- 3.3 SPP supports the local initiative to deliver housing for a range of occupants, with a focus on social, affordable and intermediate housing. As noted in the Neighbourhood Plan, Saddleworth is identified as a clear sub-market, with a distinct need for affordable housing.
- 3.4 The Plan identifies little need for private rented accommodation, with 64% wanting more owner-occupied, and 37% wanting more social rented stock. There is a strong preference for three bedroom houses (64%), then two bedroom houses (39%).
- 3.5 Sites such as SBC represent a logical and sustainable opportunity for future housing delivery, particularly in the short to medium term, given the availability of existing infrastructure and services and the site's previously developed status. The principal narrative from SPP's earlier representations remains equally relevant here: SBC is a contained brownfield site in an accessible location, embedded within an established residential context, and is therefore better suited to residential redevelopment than continued employment use. The site offers an opportunity to contribute towards local housing needs, including family housing and affordable provision, whilst also improving compatibility with surrounding uses and making more effective use of land.
- 3.6 The inclusion of flexibility within the policy is welcomed and supported. Housing mix expectations should be applied in a way that recognises the characteristics and constraints of individual sites, the need to maintain deliverability, and the fact that

neighbourhood-level preference evidence should be considered alongside the wider strategic evidence base. In SPP's view, policies should not operate so rigidly that they prevent sustainable brownfield sites from coming forward, particularly where an alternative mix would still contribute meaningfully to identified local needs.

- 3.7 It is important that the application of housing mix requirements does not adversely impact the viability and deliverability of development. Where it can be demonstrated through the planning application process that strict adherence to a preferred housing mix (as set out in the draft Neighbourhood Plan) or within an adopted Local Plan, would adversely impact development viability, the policy should allow sufficient flexibility for an alternative mix to be delivered.
- 3.8 The principle of delivering affordable housing through new residential development is supported. Ensuring that development contributes towards meeting the borough's affordable housing needs is an important component of delivering balanced and sustainable communities.
- 3.9 The housing policy should also be read in the context of Oldham's emerging Local Plan housing policies and the previous representations submitted by SPP. Those representations demonstrate that SBC is a sustainable, previously developed site in an accessible location, capable of contributing to housing delivery in the short to medium term. The site is surrounded by established residential development and benefits from proximity to local services, public transport and existing infrastructure. In this context, residential redevelopment would not only contribute towards identified housing needs, including affordable and family housing, but would also secure a more compatible land use than the existing employment function.

Policy 16: Consultation

Major developments should have as a condition of their approval, the formation of a consultation group with local residents and groups, to discuss the development between planning approval and completion.

Applications for development should facilitate positive and proactive engagement with the community by those bringing forward plans for development, both as plans are prepared and submitted, and as development takes place. In support of this, all planning applications for development which are likely to have an impact beyond the immediate site should be accompanied by a Statement of Community Engagement

- 3.10 SPP supports the principle of positive and proactive community engagement in the preparation and delivery of development proposals, particularly where schemes are of a scale or nature that may have effects beyond the immediate site. Early dialogue with local residents and stakeholders can assist in identifying issues at the outset, improving scheme design, and foster a more transparent decision-making process. In that regard, the expectation for a Statement of Community Engagement to accompany relevant applications is supported in principle.

- 3.11 Consultations should however, support effective engagement without duplicating existing statutory processes. In this respect, it would be preferable for the policy to encourage appropriate engagement measures to be agreed on a case-by-case basis, rather than imposing a uniform requirement in all instances.

Retail, Commerce and Tourism

Policy 19: Retail, Commercial and Industrial Development

New office, retail and commercial development will be supported within existing or new employment areas subject to the following criteria:

- *the scale and nature of the proposals would not have significant harmful impacts on the amenities of adjoining sites;*
- *the scale and nature of the proposals would not have an unacceptable impact on existing commercial activity on adjacent land, including agricultural activity; and*
- *the proposal would not have unacceptable impacts on the local road network, particularly in respect of the volume of HGV traffic.*

Transport assessment or statements should be provided in line with the requirements of Places for Everyone (see Travel and Transport section).

In addition to site allocations in the Local Plan for Oldham (including PfE), proposals will be supported which result in the creation or sustainable expansion of existing and new businesses, particularly those defined as micro (sole traders or those with fewer than ten employees) or small (ten to 50 employees).

Such proposals will be supported where the following all apply:

- *the site is located outside the Green Belt or the development is acceptable in terms of national Green Belt policy;*
- *the proposal supports new business investment or the expansion of an existing business;*
- *the site is large enough to accommodate car parking, including electric vehicle charging points (or other renewable technology), service areas and landscaped areas appropriate to the scale of the business; and*
- *the proposals recognise the overall aim to reduce carbon emissions and congestion through sustainable design and promoting access by walking, cycling and public transport.*

Development is preferred which involves the reuse of existing buildings. Where re-use of the existing buildings is not possible, redevelopment of those sites would then be considered.

There will be a strong presumption against the loss of commercial premises.

The Local Plan for Oldham provides the criteria for change of use around viability, marketing and regeneration benefits. In Saddleworth, as part of the marketing assessment, we would expect to see that land has not been in active use for at least 12 months, and that the marketing campaign would be for a continuous period of 12 months.

Policy 23: Services

Developments will be supported which make provision for or allow for the retention of key services within individual village centres, in particular supporting the model of 20-minute neighbourhoods

- 3.12 The above policies place weight on retaining commercial premises and supporting local services. SPP however, maintain a narrative that retention should not be pursued in isolation from evidence on viability, suitability and deliverability. Where a site is no longer capable of serving modern business needs, and where its continued employment use gives rise to access, operational and amenity conflicts, policy should allow an alternative use that delivers a more sustainable outcome.
- 3.13 As set out in SPP's earlier representations, supporting evidence prepared for the site demonstrates that SBC does not meet the requirements of a modern business location and has experienced longstanding viability and performance issues. The site is constrained in physical and operational terms, requires significant ongoing investment, and is poorly suited to modern commercial or industrial activity. In that context, a presumption against the loss of commercial premises would not be justified where the evidence indicates that continued employment use is neither realistic nor sustainable.
- 3.14 SPP does not object to the broad objective of supporting appropriate local employment and commercial activity. The policy however, must be read and applied in a manner that reflects the draft Oldham Local Plan employment policies, particularly Policies E2 and E3, which recognise that non-employment uses may be appropriate where an existing employment site is no longer suitable, viable or realistic for continued employment use.
- 3.15 In the Regulation 19 representations, SPP addressed the draft Local Plan employment policy framework in detail. Draft Policy E2 identified Business and Employment Areas as the principal locations for employment uses, while draft Policy E3 provided the mechanism through which other uses may be permitted where it can be clearly demonstrated that continued employment use is no longer appropriate. The Policy E3 criteria are therefore highly material to the Neighbourhood Plan's approach to commercial premises. They require consideration not simply of whether a site is currently in use, but whether it remains suitable for modern business needs having

regard to matters such as highways access, site location, infrastructure, physical constraints, environmental considerations and neighbouring amenity.

- 3.16 As set out in the previous representations, the SBC site is constrained by an existing access arrangement and lacks footways. This is unsuitable for modern commercial or industrial activity, particularly where HGV movements are involved, and cannot be feasibly adapted to provide a safe and compliant commercial access. The access is also shared with nearby residential properties, giving rise to direct conflict between commercial traffic, servicing activity and residential movements.
- 3.17 The previous representations also explain that the site does not perform well as a modern employment location. The Market Assessment attached to the draft Local Plan representations notes that SBC is poorly located for its current function, does not meet modern occupier requirements and has required substantial ongoing investment, including in relation to repairs, plant and machinery and energy performance. Although occupation levels may currently be high, that does not demonstrate long-term suitability or viability.
- 3.18 A strict presumption against the loss of commercial premises would risk undermining the flexibility deliberately provided by draft Policy E3 and could prevent the redevelopment of sites where the evidence demonstrates that continued employment use is no longer appropriate. In the case of SBC, residential redevelopment would provide a more compatible and sustainable land use, reduce highway and amenity conflicts, and make effective use of previously developed land within an established residential context.
- 3.19 Policy 19 should therefore be modified to make clear that alternative uses will be supported where robust evidence demonstrates that continued employment or commercial use is no longer viable, suitable or deliverable. Such wording would ensure consistency with the draft Oldham Local Plan employment policy framework, and allow appropriate weight to be given to site-specific evidence.

Design

Policy 10: Design, Character and Heritage

Development that enhances or preserves Conservation Areas and heritage assets in the area – as well as their distinct character, appearance, and setting – will be supported. There is a strong presumption in favour of developments which retain existing heritage assets and their setting, to the fullest extent. Any proposal that incorporates the partial or full loss of a heritage asset must demonstrate why the reuse of the asset is not applicable, through the submission of a detailed Heritage Statement and accompanied structural/ condition and viability surveys to justify the extent of harm.

Development will be supported which is of a high quality of design, and which complements and enhances the distinct local character and identity of Saddleworth's villages.

This shall be achieved by, for example:

- *the use of distinctive local building materials, to ensure complementary and sympathetic design to enhance or better reveal the distinct Saddleworth vernacular, with particular regard given to the design and materials used in weavers' cottages and associated mill buildings;*
- *a presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context. In particular, extensions and infill development should respect and be sensitive to their context and settings;*
- *taking into account the context of listed buildings, conservation areas, scheduled monuments and their settings, along with significant views (see policy 2). Whilst OPOL (and future local green spaces) and other types of protected status should also be considered;*
- *the provision of associated high-quality public realm.*

Proposals which substantially harm the special character, and/or architectural and/or historical significance, and setting of Conservation Areas, heritage assets, and adjoining vernacular styles in the area will not be supported. Account will be taken of the Local Heritage List designations (once adopted) when considering planning and development. Particular weight will be given in favour of developments which incorporate environmental technology in a way which is complementary to the heritage of the area.

3.20 SPP recognise and support the expectation that development should respect and enhance the historic quality and character of the area. The principal point from the earlier representations is that retaining SBC in its current employment form would represent a missed opportunity to secure a more sympathetic and contextually appropriate relationship with the surrounding residential and heritage setting. The removal of commercial activity and its replacement with a high quality residential scheme has the potential to reduce visual and environmental impacts associated with the existing use, whilst allowing the site to respond more positively to the character of Delph and the approach to the New Delph Conservation Area.

3.21 Through sensitive design, development could preserve and enhance the setting of the New Delph Conservation Area and the nearby listed buildings. In particular, a well designed housing scheme could better reflect the character and context of these

heritage assets, contributing positively to the wider townscape and improving the overall quality of the area.

Policy 11: Design Masterplans

Design masterplans should be prepared for developments of more than 25 houses, which should:

- *be in accordance with an infrastructure delivery plan, according to scale;*
- *create buildings, spaces and streets which positively reflect and respond to the local landscape, townscape and historic character;*
- *create integrated, accessible and sustainable transport systems with walking, cycling and public transport designed to be the most attractive forms of transport and effectively linking into the surrounding areas;*
- *provide a clear structure and hierarchy of pedestrian friendly streets and well-connected footpaths and cycle ways integrated with the wider built and natural environment and communities;*
- *plan for integrated and mixed-use communities with walkable locally accessible community, employment and retail facilities;*
- *positively integrate with adjacent communities and positively contribute to their character and the way the area functions, including addressing infrastructure matters;*
- *provide a diverse and distinctive range of flexible and adaptable house types, tenures and building forms to meet the differing needs of the population;*
- *provide strategies for foul and sustainable surface water management; and*
- *create an accessible multi-functional green infrastructure network. Integrate existing areas of blue and green infrastructure in development with consideration being given to the provision of access, surveillance and the orientation of buildings to promote positive engagement with the wider blue/ green infrastructure network.*

3.22 SPP support the proposition that high quality design standards will be expected from all developments. SPP put forward that high quality development can be delivered at SBC- there is a clear opportunity to deliver a considered residential scheme that reflects the character of the surrounding area, incorporating high quality materials, active frontages, and legible layouts at the site. Particular attention should be given to the interface with Huddersfield Road and the approach to the New Delph Conservation Area, ensuring that development enhances key views and contributes positively to the sense of place.

3.23 A comprehensive and design-led approach, supported through the re-designation of the site, will ensure that development not only complies with Neighbourhood Plan objectives, but also delivers a scheme that enhances local character, responds

sensitively to its context, and contributes to the long-term quality and sustainability of the area.

3.24 SPP do, however, question the necessity for all developments of 25 or more dwellings to be brought forward in accordance with a masterplan. The core narrative from the earlier representations is that policy requirements should be applied proportionately and should not create unnecessary barriers to the redevelopment of sustainable brownfield land. While a masterplanned approach may be appropriate for large, strategic or multi-phased sites, the blanket application of such a requirement is not justified for more modest schemes, particularly those within an established urban context. In the case of SBC, the site is self-contained, clearly defined and surrounded by existing development, such that matters relating to design, movement, landscape, drainage and infrastructure can be properly addressed through the planning application process and supporting technical submissions. Requiring a separate masterplan in these circumstances would add an unnecessary procedural layer with limited practical benefit, and could delay the delivery of a suitable and sustainable housing site. A more proportionate, criteria-based approach would therefore be preferable.

4 Proposed Modifications

4.1 In order to ensure that the Saddleworth Neighbourhood Plan is justified, effective and consistent with the development plan framework and national policy, SPP propose that the following modifications are made. Proposed policy wording amendments have been detailed in ***bold italics*** in the text below.

Policy 15: Housing

*Development will be supported which delivers a range of housing types, with specific focus on the provision of affordable, social and intermediate housing. In particular, preference will be given to developments which include one-bedroom accommodation targeted at young people, allowing those leaving family homes for the first time to remain in the area, and appropriate homes for the elderly and disabled, which promote accessibility, **having regard to site-specific circumstances, viability, deliverability and the wider strategic evidence base.** Individual developments which fit those needs will also be looked upon favourably, **but these preferences should be applied flexibly and should not prevent sustainable brownfield sites from coming forward where an alternative mix would still contribute meaningfully to identified housing needs.***

Policy 16: Consultation

*Major developments should have as a condition of their approval, the formation of a consultation group with local residents and groups, to discuss the development between planning approval and completion **to facilitate positive and proactive engagement with the community, in a proportionate manner having regard to the scale, complexity and likely effects of the development proposed.***

*Applications for development should facilitate positive and proactive engagement with the community by those bringing forward plans for development, both as plans are prepared and submitted, and as development takes place. In support of this, all planning applications for development which are likely to have an impact beyond the immediate site should be accompanied by a Statement of Community Engagement, **where appropriate.***

Policy 19: Retail, Commercial and Industrial Development

... Development is preferred which involves the reuse of existing buildings. Where reuse of the existing buildings is not possible, redevelopment of those sites would then be considered.

*There will be a strong presumption against the loss of commercial premises-, **unless robust evidence demonstrates that the site is no longer viable, suitable or***

realistic for continued commercial use, and that an alternative use would deliver a more compatible and sustainable form of development.

Policy 10: Design, Character and Heritage

*Development that enhances or preserves Conservation Areas and heritage assets in the area – as well as their distinct character, appearance, and setting – will be supported. There is a strong presumption in favour of developments which retain existing heritage assets and their setting, to the fullest extent, **while also supporting the sensitive reuse or redevelopment of previously developed sites where this would preserve or enhance the significance, character and setting of nearby heritage assets.** Any proposal that incorporates the partial or full loss of a heritage asset must demonstrate why the reuse of the asset is not applicable, through the submission of a detailed Heritage Statement and accompanied structural/ condition and viability surveys to justify the extent of harm.*

Policy 11: Design Masterplans

Design masterplans should be prepared for developments of more than 25 houses; ~~which should:~~ where justified by the scale, complexity or phased nature of the proposal. For smaller or self-contained sites within an established built-up context, the matters set out below may be addressed through the planning application process and supporting technical submissions...

5 Next Steps

5.1 SPP confirms that it would wish to stay up-to-date with the proceedings and next steps of the Saddleworth Neighbourhood Development Plan.

6 Conclusion

- 6.1 SPP supports the preparation of the Saddleworth Neighbourhood Plan and its ambition to guide sustainable development across the area however, the Plan should also provide an appropriate degree of flexibility to ensure that previously developed sites which are no longer suitable or viable for their existing use can be redeveloped to meet changing local needs.
- 6.2 Saddleworth Business Centre represents a sustainable brownfield redevelopment opportunity that is increasingly incompatible with continued employment use due to its constrained access arrangements, surrounding residential context and operational limitations. Redevelopment for housing would make more effective use of the land, reduce amenity and highway conflicts, and contribute positively towards identified housing needs in a highly accessible location.
- 6.3 The proposed modifications set out in these representations would strengthen the Plan by ensuring that its policies are applied proportionately and in a manner that recognises site-specific circumstances, viability considerations and the need to support the delivery of sustainable development. In particular, they would avoid unnecessarily preventing the redevelopment of suitable brownfield sites where an alternative use would provide greater planning benefits.

Appendix I

Site Location Plan

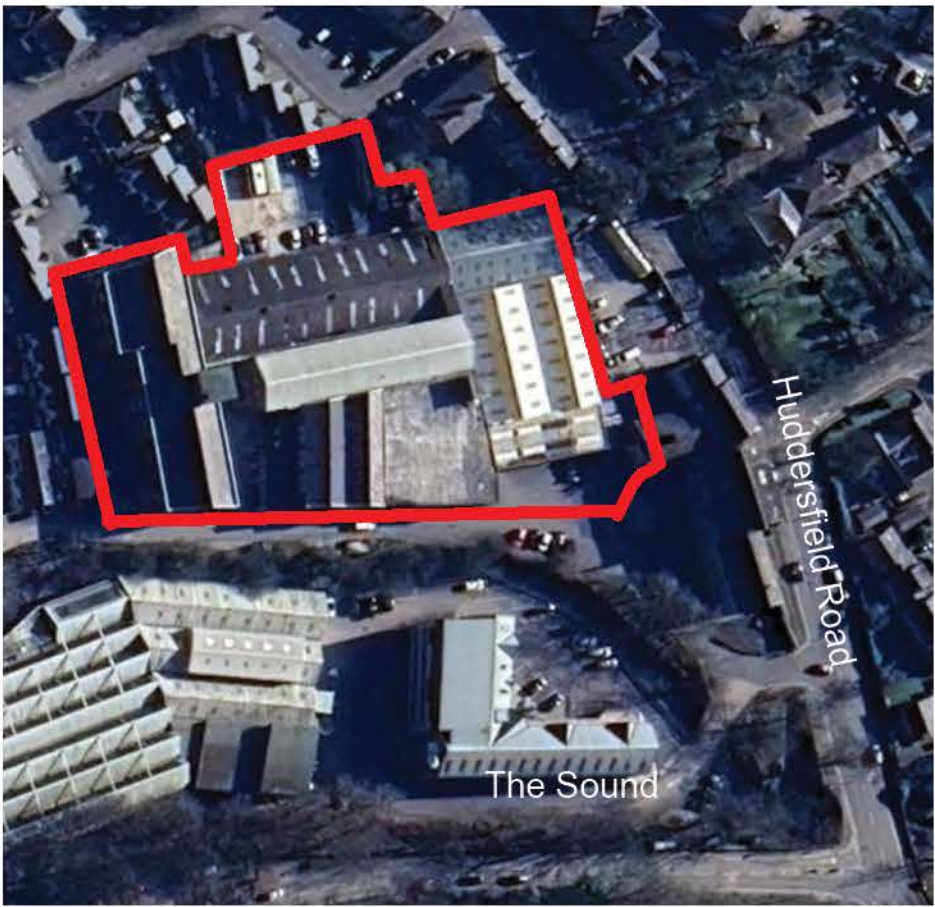
Proposed residential development at Saddleworth Business Centre Delph



schedule of accommodation

ref	accommodation	area sqm	sqft	no	total sqft
A	3 bedroom house	84.0	903	11	9933
B	3 bedroom house	90.0	968	4	3872
C	3 bedroom house	93.0	1001	5	5005
D	4 bedroom house	97.0	1043	2	2086
E	4 bedroom house	121.0	1301	8	10408
total no units				30	31304

car parking:
court parking 150%
in-curtilage 200%



location plan



option two inclusion of apartment block

loss of 4no B types and 1no D Type-		5no units		5883sqft	
gain of:	F 1 bedroom apartment	52.0	560	3	1680sqft
	G 2 bedroom apartment	65.0	699	9	6295sqft
total				12	7975sqft

NOTES

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All dimensions are to be checked on site prior to construction, manufacture of any components and ordering of materials and equipment.

Any discrepancies are to be reported to the architect for clarification.

All materials and workmanship to be in accordance with the current British Standards and codes of practice.

This drawing is to be read in conjunction with all relevant Architectural, Structural Engineers, Mechanical Engineers, Electrical Engineers and Specialists drawings and specifications.

As with all construction projects the CDM 2015 regulations apply and the work on this project may require both the issue of a notification to the HSE (because of the durationof the works on site) and the client may also need to appoint a Principal Designer because there may be more than one contractor working on site. The Principal Designer will be able to coordinate the pre-construction information and also ensure that all duty holders under CDM comply with their relevant duties.

The building owner is to serve a Party Wall Act Notice as applicable to adjoining property owners as outlined in TheParty Wall Act 1996 The Building Contactor is to verify the thickness of the party walls prior to commencement of the proposed works.

REV	DESCRIPTION	CHECK	DATE
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CLIENT
Grasscroft Property

PROJECT
Proposed residential development at
Saddleworth Business Centre, Delph

DRAWING
Feasibility Layout two

SCALE 1:500 at A2	DATE April 2026	DRAWN 	CHECKED
DRAWING NO. R 1106	CAD REFERENCE NO. sk 02	REVISION	



Appendix II

Previous Site Representations



AshtonHale

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

Saddleworth Business Centre

March 2026

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Appendices

Appendix I Site Location Plan

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

Prepared by: COD/RB

Status: Final

For and on behalf of AshtonHale Limited

1. Executive Summary

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

2. Introduction

- 2.1 These representations have been prepared by AshtonHale Ltd on behalf of Saddleworth Property Partnership (hereby referred to as “SPP”) in response to the Oldham Council Local Plan Regulation 19 Consultation.
- 2.2 These representations are made in relation to the SPP’s interest at Saddleworth Business Centre (“SBC”, or “the site”). SBC contains a mix of industrial, warehouse and leisure uses within Delph, Oldham. The site itself comprises a mix of employment uses contained within a former mill building that has been significantly extended, altered and subdivided to form a business centre, together with associated access roads and circulation areas.
- 2.3 A plan showing the SPP’s land interests is attached at Appendix I.
- 2.4 These representations intend to cover the following:
- A background to the SPP’s interests at Saddleworth Business Centre;
 - The case for housing delivery at the Saddleworth Business Centre site in relation to the policies contained within the Publication Plan;
 - Commentary on the soundness of Oldham Council’s Publication Plan;
 - SPP’s proposed modifications to the Publication Plan;
- 2.5 Whilst a standalone document has been submitted to Oldham Council via email, a version of this text has also been submitted online via the Council’s online consultation portal.

3. Background to Representations

Site Summary

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

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

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

Site Aspirations

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

Key Site Considerations

Highways and Accessibility

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

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

Heritage

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

- 3.20 Replacing the existing employment use with a sensitively designed residential development offers the potential to positively enhance the area's residential character, while also preserving, and where possible improving, the setting of the New Delph Conservation Area and the adjacent Listed Buildings.

Ecology

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

Flood Risk and Drainage

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

Services and Amenity

- 3.24 All necessary services and utilities are located within close proximity to the Site's boundary. Amenities in proximity to the Site have been summarised below:
- Co-op Food, King Street: c. 0.1 mile from the Site
 - Albion Farm Shop & Café: c. 0.9 miles from the Site
 - Tesco Superstore, Chew Valley Road: c. 2.8 miles from the Site
 - Asda Superstore, Greenfield Lane: c. 4.1 miles from the Site
 - Old Bell Inn public house, Delph: c. 0.1 mile from the Site
 - Bulls Head public house, King Street: c. 0.1 mile from the Site
 - Swan Meadow Nursery, Church Street: c. 0.4 miles from the Site
 - Delph Primary School, Denshaw Road: c. 0.5 miles from the Site

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

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

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

4. Planning for Growth

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

National Planning Policy Framework

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

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

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

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

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

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

Regulation 19 Oldham Local Plan– Key Strategic Policies

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

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

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

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

4.11 Policy H1 states that “ *The Council will promote a diverse housing offer to meet the differing needs of all Oldham’s residents. Oldham’s minimum local housing need (the number of new homes needed) is set out in Policy JP-H1 of PfE. PfE sets out that Oldham is required to deliver at least 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year” and that “ Planning applications for residential development, in whole or as part of a mixed-use scheme, will be permitted where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies”.*

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

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

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

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

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

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

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

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

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

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

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

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

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

5. Policy and Evidence Review

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

Section 9: Economy and Employment

Employment Provision

- 5.2 The Publication Local Plan sets out the Council's ambition to help create the conditions in which businesses can invest, expand and adapt, in line with the NPPF. The document notes that by attracting new investment, supporting local businesses and leading in green technologies, the Council will generate quality job opportunities and equip people with the skills they need to succeed.
- 5.3 Publication Plan **Policy E1** details that in order to achieve the overall employment floorspace requirements for Oldham, at least 57,481m² of office (E(g)(i)) floorspace and at least 240,656m² of industrial and warehousing (B2 and B8) floorspace will be provided before 2039.
- 5.4 These figures differ notably from those set out in the Draft Employment Land Review (January 2024), which identifies a total requirement of 213,291 sqm of employment floorspace, comprising 49,133 sqm of office space and 164,158 sqm of industrial and warehousing floorspace within Oldham.
- 5.5 The Publication Plan explains that its figures are derived from a methodology previously advanced by the Places for Everyone authorities during the Main Modifications stage of the PfE examination however, the Inspectors concluded that such modifications were not necessary to ensure the soundness of the joint plan, as national policy does not require the apportionment of employment land requirements at the district level. As a result, the approach taken in the Publication Plan is not aligned with PfE and does not appear to be based on a consistently applied or clearly justified evidence base. The discrepancy between the PfE figures and those in the Regulation 19 Plan further undermines the robustness of the identified requirements.
- 5.6 Furthermore, even if the Plan were to rely on the PfE figures, these represent a supply position as at April 2022 and include a combination of saved Unitary Development Plan allocations,

sites with extant planning permission, and allocations identified within PfE. As such, they do not provide an up to date or policy led assessment of future employment land needs, and their continued reliance raises concerns regarding the Plan's evidential accuracy and consistency.

5.7 The figures included within the Publication Plan have been inflated and do not reflect those within the Draft Employment Land Review used to inform the Draft Local Plan. It is therefore considered that the Council are claiming an over-supply of need for employment land provisions in the borough.

5.8 **Policy E2** of the Plan identifies the 23 Business and Employment Areas to be designated across Oldham, including land at Valley Mills (BEA21). The Policy sets out that uses within these sites will be restricted to employment uses. **Policy E3** further notes that other uses than those set out within Policy E2 will not be permitted unless the applicant can clearly demonstrate that it is no longer appropriate to continue its existing use.

5.9 Within the Regulation 18 consultation exercise, SPP submitted a robust justification seeking to re-designate SBC from its existing employment use on the grounds that the site can not viably continue to operate in the modern industrial and warehousing industry. It was demonstrated that the site is more suitably redeveloped for residential use. This position is reinforced below with reference to the criteria set out in draft Policy E3, through which it can be clearly shown that the site is no longer appropriate for continued employment use:

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

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

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

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

- 5.10 The previous representations submitted at this site included a Market Assessment prepared by Avison Young. This Assessment set out that SBC held an inability to meet the needs of a modern business, which in turn will generate a poor market demand. It was noted that the site was extremely poorly located for its current function and that SBC itself had performed poorly over a significant period of time, in terms of both void accommodation and the ability to achieve a realistic financial return due to substantial continual refurbishment required regarding such items as roof repairs, plant and machinery repairs and improvements required for EPC ratings.
- 5.11 Importantly, SPP have highlighted that the continued inefficient use of the site for employment purposes would have significant effects on the adjacent residential uses, including potential noise and light pollution issues associated with HGV movements.

Section 8: Homes

Housing Delivery

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

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

Table H1: Phasing of Housing Requirements

- 5.13 **Policy H1** of the Publication Plan sets out that “*applications for residential development, in whole or as part of a mixed-use scheme, will be permitted where the proposed development is consistent with national policy and guidance, PfE and other Local Plan policies*”.
- 5.14 The Publication Plan sets out that housing development on previously developed land, within sustainable and accessible locations will be supported. All residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL) 4 or above. In accordance with the latest February 2026 GMAL data set, the SBC site achieves a GMAL score of 5.
- 5.15 As set out, the Publication Plan has been prepared in alignment with the 2021 publication of the NPPF. Oldham’s housing requirements are stepped over three periods, and will increase significantly from 2026 onwards.

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

services. This is especially relevant if the Plan is updated in line with the revised standard method. In light of the above, the Local Plan should recognise SBC as a suitable and viable location for residential development to help meet housing needs. Accordingly, the site should be released from its current employment designation.

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

Housing Densities

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

Housing Mix

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

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

5.28 The Policy continues to note that;

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

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

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

Affordable Housing

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

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

- 5.32 In accordance with the Value Area's map found within the Publication Plan, SBC is located within a 'Higher Value Zone' for affordable housing, meaning that 20% of site capacity upon brownfield land should be delivered as affordable housing.
- 5.33 The Publication Plan notes that developments should provide affordable housing onsite however, by exception, it may be more appropriate, in meeting local needs for the payment of a commuted sum/ developer contribution to off site provision, or a mixture of onsite/off site provision. Off site contributions should provide the number of units that would have been delivered on site.

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

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

Green Infrastructure Network

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

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

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

Section 15: Oldham's Historic Environment

Conservation Areas

5.40 **Policies HE1, HE2 and HE3** set out that where proposals positively conserve and enhance the historic environment and their setting will be supported by the Council. Development should actively manage proposals affecting conservation areas and ensure that elements which contribute to a conservation area's special character are preserved. Development will be supported where it is designed sympathetically having regard to the significance of the asset, its character, features and setting. Proposals within a conservation area, or affecting the setting, should:

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

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

- 5.41 There are no designated heritage assets within the SBC site. The nearest heritage assets lie beyond the southern boundary, adjacent to Huddersfield Road (A62). These include the Grade II listed Old Bell and Bell House, as well as the New Delph Conservation Area, which borders the site to the south and includes the existing access road.
- 5.42 The continued allocation of the site for employment use is not aligned with national policy, which seeks to make effective use of land and support development that responds positively to its context. Retaining the site in its current form would represent a missed opportunity to enhance the character and quality of the area. The removal of commercial activity and its replacement with a high quality residential scheme would also reduce visual and environmental impacts associated with the current use, thereby improving the setting experienced by nearby residents as well as heritage assets.
- 5.43 By contrast, the removal of the existing employment use and redevelopment for residential purposes presents an opportunity to deliver a high quality scheme that strengthens the residential character of the area. Through sensitive design, development could preserve and enhance the setting of the New Delph Conservation Area and the nearby listed buildings. In particular, a well designed housing scheme could better reflect the character and context of these heritage assets, contributing positively to the wider townscape and improving the overall quality of the area.

Section 16: Achieving High Quality Design

Design

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

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

Section 20: Infrastructure and Delivery in Oldham

Planning Obligations

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

6. Tests of Soundness

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

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

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

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

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

Positively Prepared

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

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

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

Justified

- 6.8 The NPPF states that for a plan to be "justified", it must be an appropriate strategy when considered against the reasonable alternatives, and must be based on proportionate evidence.
- 6.9 The designation of SBC as part of BEA21 is not justified when considered against reasonable alternatives. Evidence submitted by SPP demonstrates that the site is no longer suitable for employment use, particularly when assessed against Policy E3 criteria. The Council has not adequately demonstrated why the retention of SBC for employment use is the most appropriate strategy when compared to the clear and deliverable alternative of residential redevelopment.
- 6.10 In addition, the employment land requirement figures within the Plan are inconsistent with the Council's own evidence base and appear inflated.

Effective

- 6.11 The NPPF states that for a plan to be "effective", it must be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 6.12 The continued allocation of SBC for employment use is not deliverable in practice. The site is constrained, underperforming, and not capable of meeting modern employment requirements. There is no realistic prospect of the site contributing meaningfully to the borough's employment land supply.

- 6.13 The site however, is immediately available and suitable for residential redevelopment, with a clear prospect of delivery in the short to medium term. The failure to recognise this opportunity reduces the effectiveness of the Plan in delivering housing.

Consistent with National Policy

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

7. Proposed Modifications

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

Policy E2- Business and Employment Areas

- 7.2 SPP suggest the below amended wording to Policy E2:

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

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

[Removal of BEA 21 Valley Mills from Table E1]...

Policy H1- Delivering a Diverse and Sustainable Housing Offer

- 7.3 SPP support the addition of the following text to Policy H1:

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

Planning applications for residential development, in whole or as part of a mixed-use scheme, will be permitted where the proposed development is consistent with national planning policy and guidance, PpE and other Local Plan policies. Proposals for the development of previously developed land will be considered favourably. The Council will support residential development proposals that are in sustainable and accessible locations and that promote and encourage use of public transport, walking, wheeling and cycling. All residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL)26 4 or above. In all cases, distances should be measured from the centre of the

application site. This requirement should be met unless it can be demonstrated by the applicant that it is not appropriate, or the development provides exceptional benefits to the surrounding environment and community.

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

8. Participation at Hearing Sessions

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

9. Conclusion

- 9.1 SPP strongly object to the continued designation of Saddleworth Business Centre as part of Business and Employment Area BEA21 within the Publication Local Plan.
- 9.2 Evidence clearly demonstrates that the site is no longer suitable, viable or appropriate for employment use. Its continued allocation for such purposes is not justified, would not be effective in delivering employment land, and conflicts with national policy objectives to make efficient use of land.
- 9.3 SBC represents a sustainable, deliverable and logical opportunity for residential development. The site is previously developed, well located in accessibility terms, and embedded within an established residential area. Its redevelopment would contribute positively towards meeting housing needs, improving the character of the area, and enhancing the setting of nearby heritage assets.
- 9.4 In the context of an evolving national policy framework, and the likelihood of increased housing requirements, it is essential that the Council adopts a flexible and proactive approach to identifying deliverable housing sites.



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