

Examination of Oldham Local Plan

Oldham Council Response to Inspectors' Initial Questions

1. Further to the recent submission of the Oldham Plan for Examination, we are writing with some initial questions for the Council which we anticipate will help us to frame our formal questions. We look forward to working with you at what we hope will be a productive Examination.
2. The following Initial Questions relate to factual questions that have arisen as we start to review the evidence base. If the information we are seeking is contained within a specific document we are happy for you to just signpost us to where the information can be found. Where we anticipate that further information is needed we have indicated this below.

Procedural Matters

3. We understand that the Council does not currently have a Leader and has referred itself to the Ministry of Housing Communities and Local Government (MHCLG). In light of this, can the Council advise on whether there is currently a Portfolio Holder for planning, and if not, what arrangements are in place for ensuring the Council has the legal authority to address procedural matters arising from the examination of the Plan? In particular, is the Council intending to submit a schedule of proposed Main Modifications to the Plan, and if so when is this likely to be submitted?

Oldham Council Response

Governance Procedures

The Council does not currently have a Portfolio Holder for planning. However, there are arrangements in place to ensure the Council has the legal authority to address procedural matters arising from the examination of the Plan.

The Council's [Local Planning Scheme of Delegation](#) sets out the levels of decision-making required for documents prepared as part, and in support, of the Local Plan. For development plan documents (DPDs) the levels of decision-making for the examination stage, and onwards, are as follows:

- Preparation, and submission, of material requested by the Inspector as part of the examination process – Head of Service
- Approval, and publication, of modifications to the Publication plan, as recommended through the independent examination, for public consultation (as per s20 (7c) of the Planning and Compulsory Purchase Act (PCPA) 2004) – Cabinet
- Adoption (s23 PCPA 2004) – Council
- All other powers and duties relating to the preparation of DPDs – Executive Director

In line with the above, the Head of Strategic Planning and Transport has the delegated authority to prepare, and submit, material requested by the Inspector as part of the

examination process. This includes the in-principal agreement of modifications recommended through the examination process, on the basis that these are subject to Cabinet approval prior to public consultation.

With regards to the formal approval of any proposed modifications for public consultation the Council's Local Planning Scheme of Delegation sets out that this should be taken by Cabinet as a key decision, on the basis that they are significant in terms of their effects on communities living or working in two or more wards in Oldham.

Oldham Council does not currently have a leading administration. The Council's constitution authorises the Chief Executive to take any decisions in respect of the Council's executive functions (which generally fall into either the key decisions or principal decisions criteria) in the event of there being no Council Leader, Deputy and Cabinet. These powers have been exercised to ensure the effective running of Council services and interim governance mitigations have been put in place. These mitigations include:

- Fortnightly cross-party consultative meetings involving all political group leaders and deputy leaders prior to principal or key decisions being taken by the Chief Executive. These will alternate between decision-focused meetings and briefing, providing regular opportunities for both pre-decision consultation and wider discussion of issues affecting the authority and its communities.
- A process for pre-decision scrutiny of principal and key decisions has been established via the Governance, Strategy and Resources Scrutiny Board. The Board will meet monthly and its recommendations will be submitted to the Leaders' consultative session so that the Chief Executive can give due consideration to these prior to decisions being made.

Where key decisions are required, such as approval of proposed modifications for public consultation, the Head of Strategic Planning and Transport, in liaison with the Programme Officer, will ensure that the necessary lead-in time for report arrangements is accounted for in line with the above mitigations.

Full details can be found in the [Interim Governance Mitigations report](#) to Council on 16 September 2026 which is available online.

All other powers and duties relating to the preparation of DPDs, including procedural matters comprising administrative decisions, may be made by the Executive Director in accordance with the Local Planning Scheme of Delegation.

Modifications

In accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004, as amended by Section 112(2) of the Localism Act 2011, the Council intends to formally request that, as part of the independent examination, you as the Inspectors appointed to carry out the Examination of the Oldham Local Plan recommend modifications to the Local Plan, should they be required, in order to make the document such that it:

- Satisfies the requirements mentioned in Section 20(5)(a); and
- Is sound.

Modifications have been proposed to the Council as part of representations submitted on the Oldham Local Plan: Publication Plan. The Council intends to provide commentary, as

part of the independent examination, against those that were submitted to identify those that are considered to have merit.

4. The most recent version of the National Planning Policy Framework (the Framework) was published in August 2026. However, Annex 1, paragraph 8 of the August 2026 Framework includes transitional arrangements which apply to the Plan. These transitional arrangements are set out in the December 2024 version of the Framework, Paragraph 234c of which refers to plans that include policies to deliver the level of housing and other development set out in a preceding local plan adopted since 12 March 2020. Such plans are to be considered against the 'relevant previous version of the Framework' (per paragraph 235 of the December 2024 Framework).
5. Greater Manchester Places for Everyone Plan (PfE) (adopted 21 March 2024) is a 'preceding local plan' in this context, which provides the strategic context for housing and employment needs. It therefore follows that a 'relevant previous version' of the Framework will provide the national policy context for the examination of these matters. The phrase 'relevant previous version' is undefined in the December 2024 Framework itself. However, the Council's attention is drawn to the 'Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation' of 27 February 2025, which states that the transitional arrangements included in the December 2024 Framework

"provide clarification that plans brought forward to implement policies to deliver housing and other development set out in a preceding plan... will not be required to be updated to reflect the policies in this Framework. The intention behind this is to allow plans that have been brought forward subsequent to strategic plan policies to continue to be prepared under the same Framework."

6. The Council consider that the 2021 Framework constitutes the 'relevant previous version' for the purposes of the examination.
7. To assist with our consideration of this matter it would be helpful if the Council could provide brief but comprehensive answers to the following questions.
 - Why the Council considers the 2021 Framework to constitute the relevant previous version of the Framework for the purposes of this examination, and whether the updated version of this issued in September 2023 should provide the context for the examination?
 - As PfE does not set out development needs relating to Gypsy and Traveller accommodation whether the transitional arrangements set out in paragraph 234(c) of the December 2024 Framework apply to the Plan in terms of these specific needs?

Oldham Council Response

Relevant previous version' of the National Planning Policy Framework

Information on how the Oldham Local Plan aligns with the National Planning Policy Framework (NPPF) can be found in the Setting the Scene Topic Paper ([PW07](#)) published alongside the Publication Plan.

Places for Everyone (PfE) is the 'parent' plan to the Oldham Local Plan, in that it provides the strategic policies for the borough. PfE was examined under the December 2021 Framework - paragraph 2 of the [Inspectors Report](#) recognises that Government published revised versions of the NPPF on 5 September 2023 and 19 December 2023 and states that transitional arrangements set out in Annex 1 of those documents meant that their examination of the Plan was under the 2021 version of the NPPF. As such, in preparing the Oldham Local Plan consideration has been given to that version of the Framework as the '*relevant previous version of the Framework*' referred to in paragraph 235 of NPPF 2024.

Nevertheless, the Council consider that the 2021 and 2023 Frameworks are materially the same for the matters the Oldham Local Plan seeks to address; whichever version applies.

Notwithstanding the above, the Council has sought to ensure that wherever appropriate, policies within the Oldham Local Plan: Publication Plan accord with NPPF 2024, as the most recent planning policy published at the time, to ensure longevity over the plan period. References made to national planning policy within the Plan, and associated supporting documents and Topic Papers, are therefore to NPPF 2024 unless otherwise stated.

Transitional arrangements for Gypsy and Traveller accommodation

Paragraph 234 (c) of NPPF 2024 refers to where '*the plan includes policies to 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*'.

PfE does not address Gypsy, Traveller and Travelling Showpeople accommodation. Identifying and meeting this need is therefore a matter for the district Local Plans.

The latest evidence set out in the [2024 Greater Manchester Gypsy and Traveller Accommodation Assessment \(GTAA\)](#) identified no need for Gypsy and Traveller pitches in Oldham up to 2041. For Travelling Showpeople, the [2018 GTAA](#) found a shortfall of 204 plots across Greater Manchester up to 2035/36, driven by household formation and overcrowding on existing yards. In addition, the need to provide for 59 transit pitches across the study area was identified.

Whilst there is no identified need for Gypsy and Traveller pitches in Oldham, it is recognised that additional need may arise over the plan period. Further work to understand and identify the spatial distribution of plots for Travelling Showpeople and transient pitches at a GM-level may also include the identification of specific sites in Oldham in the future. As such, the Oldham Local Plan: Publication Plan includes Policy H7 – Gypsies, Travellers and Travelling Showpeople, which sets out a criteria-based approach against which proposals for such uses will be considered.

In light of current evidence of need in Oldham, it is considered that the approach taken in Policy H7 provides a positive and robust planning policy framework were an application to come forward for gypsy, traveller and travelling showpeople accommodation. In this regard policy H7 is considered to comply with paragraph 63 of NPPF 2024 and paragraph 11 of the [Planning policy for traveller sites](#) (updated 27 August 2026) which states: '*Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward.*'.

8. The Council have referred to the preparation of the Spatial Development Strategy (SDS) for Greater Manchester. Please advise on the Council's assumptions for the likely delivery and adoption of the SDS. Likewise, please can the Council advise on

the progress and timeframes of any new minerals and waste plans, including whether such plans are likely to be subsumed into the SDS or whether there is an intention to prepare a new joint plan(s).

Oldham Council Response

Greater Manchester Spatial Development Strategy

As set out in our response to the Planning Inspectorates Response to the Oldham Local Plan Pre-Examination Checklist received July 2026 ([SD016](#)), although formal plan making on the Spatial Development Strategy (SDS) cannot yet take place until regulations are in force (expected around October 2026), the Greater Manchester Combined Authority (GMCA), the Strategic Planning Authority for the Greater Manchester area, is undertaking preparatory work on potential SDS policies, SDS evidence base requirements and engaging with partners across Greater Manchester, including the 10 local authorities of Greater Manchester.

Minerals and Waste

On 16 July 2025 the Council agreed to the principle of making of a joint development plan document with the other nine Greater Manchester councils (Bolton, Bury, Manchester, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan), to cover planning for minerals and waste across Greater Manchester¹.

A detailed timetable for the GM Minerals and Waste Plan has not yet been published. GM districts are taking a report to Executive / Cabinet as appropriate (in Oldham this will be 30th November 2026), which will include the proposed timetable. Regulations require the notice of intention to commence be published by 31 December 2026 and Gateway 1 to be met by 30 April 2027. An indicative timetable for the Plan is as follows:

- Notice of intention to commence Minerals and Waste Plan preparation, and publication of timetable – 31 December 2026
- Scoping consultation – January / February 2027
- Consultation on proposed content and evidence – January / March 2028
- Consultation on Minerals and Waste Plan – September / October 2028
- Submission of Minerals and Waste Plan for examination – March 2029
- Adoption of Minerals and Waste Plan – October 2029

9. Can the Council please advise of any outstanding documents which they intend to submit as part of the evidence base, and, where relevant, advise us of a date for submission of this information. In particular, can the Council advise if they intend to provide the following documents, or are seeking to rely on evidence informing PFE:

- A Heritage Impact Assessment or similar work which informs the assumptions within the Strategic Land Availability Assessment (SHLAA).
- A Transport Impact Assessment addressing the cumulative impacts of the development anticipated within the Plan.

¹ The Report to Council on the Greater Manchester Joint Minerals and Waste Plan: Decision Making Process, dated 16 July 2025, can be found online at https://committees.oldham.gov.uk/documents/s153453/Report%20for%20Full%20Council%20Minerals%20and%20Waste%20Plan_FINAL.pdf

- An update of the Oldham Retail and Leisure Study Stantec 2020.
- A methodology setting out how proposed Green Belt alterations were assessed and which details exceptional circumstances for any alterations as per the requirements of the Framework (paragraph 140 of the 2021 version).
- Can the Council confirm they are satisfied that the Local Green Space and Open Space Study which dates from 2021 and 2022 is up to date, or that any relevant updates to reflect recent development will be provided during the examination.
- The Council should also advise us of the timescale for submission of any outstanding Statements of Common Ground with statutory undertakers.

Oldham Council Response

Heritage Impact Assessment

Heritage has been considered as a constraint with the Strategic Housing Land Availability Assessment (SHLAA) desktop assessment work where applicable (see Housing Topic Paper Appendix 1 ([HO02](#))).

Without an allocation, there is not a site to assess and therefore it is considered that there are no requirements for a Heritage Impact Assessment (HIA). As such, the existing evidence base prepared for PfE, the heritage information and high-level heritage assumptions embedded within the SHLAA, the Oldham's Historic Environment Topic Paper ([HE01](#)) and the Local Plan policies including HE2, provide an appropriate and proportionate evidence base.

Furthermore, Policy HE2 – Securing the Preservation and Enhancement of Oldham's Heritage Assets, sets out that applications affecting heritage assets and their setting should be fully justified and accompanied by full information necessary to assess the impact of the proposals on the heritage asset. Proposals that affect heritage assets will require the submission of a Heritage Statement (which may form part of a Design and Access Statement) proportionate to the asset's significance.

Where a Heritage Statement is required Policy HE2 goes on to state that this should:

- a) describe the significance of the asset, including its setting;
- b) assess the impact / identified harm the proposal has on its significance; and
- c) provide clear and convincing justification for the proposed works that
- d) outweigh any identified harm.

The approach taken is consistent with national guidance, which does not require site specific heritage impact assessments for non-allocated land whilst ensuring that heritage still exists in the evidence base for the Local Plan, and as such is considered to deliver the requirements of the NPPF in terms of conserving and enhancing the historic environment. This approach has been taken in liaison with Historic England.

Transport Impact Assessment

The Council is not intending to produce a Transport Impact Assessment addressing the cumulative impacts of the development anticipated within the Plan. The evidence prepared

to inform Places for Everyone² is considered appropriate and proportionate for the Oldham Local Plan given that it is a non-strategic plan that supports delivery of PfE, the GM Transport Strategy 2040 and Oldham's Transport Strategy. As set out in the [PfE Transport Topic Paper](#) (July 2021) the evidence considered the cumulative impact of growth, proposed through PfE, on the transport network. Whilst there have been updates to the land supply position since the PfE evidence was prepared, paragraph 3.90 of said topic paper sets out that the model scenarios tested did not take into account the introduction of GM's transport policies intended to support growth in public transport and active travel modes, thereby providing a "policy-off", worst case, scenario.

A summary of the evidence that has helped to shape the Oldham Local Plan: Publication Plan can be found in the Transport Topic Paper ([ST01](#)).

Furthermore, Policy T5: Vision-led Transport Statements, Transport Assessments and Travel Plans in New Development sets out that vision-led Transport Statements, Transport Assessments and Travel Plans will be required on a case-by-case basis when a proposed development would generate significant amounts of movement.

Factors that will be taken into consideration when determining whether an application needs said evidence include:

1. the scale and type of the proposed development and its potential for additional trip generation;
2. the public transport accessibility of the site;
3. the cumulative impacts of multiple developments within a particular area, including known committed future developments; and
4. any known transport issues in the surrounding area – such as peak time congestion.

Oldham Retail and Leisure Study

The Council acknowledges that the Retail and Leisure Study was prepared in 2020 and has not subsequently been subject to a full update. However, the Council considers that the evidence remains robust and proportionate for Oldham's Local Plan.

The Oldham Retail and Leisure Study 2020 ([OC03](#)) was prepared to cover the period up to 2037. The conclusion of the study was that there was no need for additional convenience (food) retail floorspace over the study period and a maximum requirement for an additional 2,381 square metres of comparison (non-food) retail sales area floorspace over the study period, which they stated was a relatively modest requirement.

Since publication of the study, the Council has continued to monitor relevant indicators through its Monitoring Reports, planning application activity and engagement with relevant stakeholders. There have been two new retail food stores developed in the borough since the study was completed, an Aldi at Lydia Becker Way in Chadderton (1,804 sqm) and a Lidl at Hollinwood Junction (1,983 sqm). In addition to this, Oldham Town Centre is undergoing a transformation; the Council, in partnership with Muse, is redefining the town's residential and retail offer. As part of this, Spindles Town Square Shopping Centre has been redeveloped to provide a new home for Tommyfield Market, a new space for work,

² Transport related evidence prepared to support Places for Everyone can be found online at <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-previous-stages/places-for-everyone-2021-regulation-19/supporting-documents-2021/?folder=09%20Connected%20Places>

and an improved leisure and entertainment offer. This has provided new retail and leisure opportunities in the town centre, in modern, fit-for-purpose accommodation.

Given the above, the Council has not identified any material change that would undermine the study's key findings or necessitate a comprehensive review of retail and leisure needs.

The Council has taken a proportionate approach and is satisfied that sufficient up-to-date evidence exists to support the Oldham town centre and the borough's other centres, and our retail and leisure policies. It is considered that a full refresh of the Retail and Leisure Study would be unlikely to alter the overall policy approach being pursued.

Updates to the Retail and Leisure Study will be carried out as necessary and in line with the following Local Plan monitoring indicator (see Local Plan Policy M1):

- Number of planning applications granted in Oldham Town Centre and the borough's other centres, for main town centre uses.

Proposed Green Belt alterations

PfE has revised the Green Belt boundary for each of the nine Greater Manchester authorities that make up the plan, including Oldham. NPPF allows, where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries through non-strategic policies. However, there is no defined methodology which exists for carrying out such minor Green Belt boundary changes. A 'tidy up' of minor boundaries (detailed amendments) of a technical mapping nature has therefore been undertaken and incorporated into the Green Belt layer on the Publication Plan Policies Map.

Appendix 8 in the Local Plan ([SD02](#)) sets out boundary revisions to the Green Belt and these have been shown on a separate web map³.

The Green Belt boundary changes have typically been proposed where:

- the base map has changed over time through improved mapping tools and the Green Belt layer needs to reflect the base map;
- the Green Belt boundary did not appear to have a clear boundary, marked by physical features that are recognisable and likely to be permanent and therefore a minor change has been proposed to improve this; and
- the Green Belt may have overlapped slightly with a residential curtilage and it is the Council's view that this was not the intention when the Green Belt was drawn up, so the dwelling / and or curtilage has been proposed to either be all included within the Green Belt or all be removed (based on site-specific context).

Appendix 1 of the Natural Environment and Open Land Topic Paper ([NE01](#)) provides reasoning for each boundary amendment. This is considered appropriate and proportionate for the minor amendments made.

³ Map of Proposed Publication Plan minor Green Belt amendments can be found online here <https://map.oldham.gov.uk/map?name=Green%20Belt%20Comparison>

Local Green Space and Open Space Study

Since publication of the Local Green Space Assessment (2021) ([NE02](#)), further detailed boundary amendments have been proposed to ensure that the boundaries are consistent with the designation (see paragraph 3.26 and 3.27 of the Oldham Local Plan: Publication Plan Natural Environment and Open Land Topic Paper ([NE01](#)) for further information).

Examples of where boundary amendments have taken place include:

- to remove land where new development now exists;
- to reflect residential curtilages;
- to reflect the basemap better and follow up to road or tree lines; and
- to include additional areas of green infrastructure.

The proposed LGSs, with any boundary amendments to the former OPOL, can be seen in Appendix 9 of the Local Plan ([SD02](#)).

Evidence will be monitored in line with the following Local Plan monitoring indicator (see Local Plan Policy M1):

- Number and type of developments permitted in Local Green Spaces.

In terms of the Open Space Study ([CO02](#)), it is considered that it remains sufficient and relevant in terms of identifying areas of open space in the borough. There have been limited instances where there have been changes to some open spaces since the publication of the 2022 Study, such as:

- Where a space has been lost (or part lost) through development;
- Where a space has been moved or replaced elsewhere as part of development;
- Where the typology of an open space site has changed, i.e. the change from a park / amenity greenspace to a play area (provision for children and young people) or an outdoor sports facility; and
- Where a new open space has been provided.

In addition, Oldham's Playing Pitch and Outdoor Sports Strategy (PPOSS) ([CO03](#)) was published in March 2025. The PPOSS builds upon the assessment of Outdoor Sports provision within the Open Space Study. The PPOSS identifies the current and future needs for sports and sets out an Action Plan for future investment and improvement.

The PPOSS has considered the needs of several types of sporting provision, including pitches / courts / facilities associated with football, rugby, cricket, hockey, netball, golf, athletics, tennis, bowls. It has also considered outdoor provision of multi-use games areas (MUGAs), which can be used for informal sports and recreation. Further information on the PPOSS is set out within the Communities Topic Paper ([CO01](#)).

Further evidence in relation to sports provision within Oldham has also been published recently – the [Oldham Local Football Facility Plan \(2025\)](#) – which again, supports the Open Space Study (and the PPOSS).

As such, given that the changes to open spaces in the borough since the 2022 study have been fairly limited, and supporting updated evidence has been provided in terms of the Playing Pitch and Outdoor Sports Strategy and the Local Football Facility Plan, it is considered that the Open Space Study remains robust and proportionate evidence of open space provision in the borough. Updates to the Open Space Study will be carried out in

due course as necessary and in line with the following Local Plan monitoring indicators (see Local Plan Policy M1):

- Number of planning applications that result in the gain or loss of identified on-site open space
- Number of S106 Planning Obligations for new or enhanced open space provision

Statement of Common Ground

Oldham Council considers that all relevant signatories, with the exception of National Highways, have signed the Co-operation Statement as recognition of their agreement to the Statement of Common Ground and their continuous collaborative working with the council. An error in the Oldham Local Plan Statement of Co-Operation (including Statement of Common Ground) ([SD012](#)) has, however, been identified – the signed statements for GMCA, the Local Nature Partnership and Tameside are missing the ‘mark’ against the ‘no resolved matters’ box. The relevant districts / organisations have been contacted and an addendum to SD012 is attached at Appendix 1.

As laid out at page 54 of SD012, National Highways are currently unable to sign the Oldham Local Plan Statement of Common Ground. The reason being that National Highways want to take a consistent approach to all Greater Manchester Local Plans, in line with PfE, and this activity is currently in progress. The Council is working with National Highways and the other eight PfE authorities, to progress this matter.

Scope of the Plan

10. We note that Appendix 1 of the Plan sets out the policies in the Core Strategy and the UDP which are to be replaced by PFE and the Oldham Part 2 Plan. Allocations in the UDP are included within the housing land supply on page 22 of HO01 but Paragraph 1.10 of the Plan states that policies and allocations in the UDP will be superseded by this Plan. Therefore, can the Council provide us with details of any policies or allocations in the UDP which are not intended to be superseded and so are to be read alongside the Part 2 Plan (or point us to where this information is within the evidence base). Likewise, please advise as to which, if any, parts of the Joint Core Strategy and Development Management Policies are to remain part of the Local Development Scheme (LDS). We note that a number of sites in the housing supply which are Saved UDP allocations (Table 10 of SO03) do not have permission and are seeking clarity as to whether these sites are to be carried forward as allocations within this Plan.

Oldham Council Response

The Council can confirm that all remaining UDP policies or allocations are to be superseded by the Oldham Local Plan.

Table A1-1 of Appendix 1 ([SD02](#)) sets out how Oldham’s Joint Core Strategy and Development Management Policies Development Plan Document have been, or are to be, replaced; Table A1-2 sets out how Oldham’s Saved UDP policies have been, or are to be, replaced.

Existing saved UDP allocations are not being carried forward as allocations in this Plan. As set out in paragraph 2.4 of the Publication Plan ([SD01](#)), this Plan does not include allocations for future development. In addition, Appendix 2 of the Plan (SD02) contains

maps illustrating the de-designation of these allocations (Appendix 2a relates to the de-designation of Business and Industry Allocations and Appendix 2b relates to the de-designation of Housing Allocations).

11. Paragraph 2.3 of the Plan and Doc SD06 states that the Plan provides a range of “non-strategic development management policies”. Can the Council therefore confirm whether they consider any of the policies in the Plan to be “strategic policies”?

Oldham Council Response

The Council can confirm that we consider none of the policies in Oldham’s Local Plan to be ‘strategic’.

As set out in paragraph 6.3 of the Setting the Scene Topic Paper ([PW07](#)), PfE sets the strategic policies for the borough, but there is still a need for local policies that support the implementation of PfE across Oldham and deliver the Council’s priorities and regeneration ambitions. Paragraphs 6.14 and 6.15 provide further information on the reasons why the focus of Oldham’s Local Plan is now on ‘non-strategic’ development management policies. Paragraph 8.1 states that collectively the strategic policies set out in PfE and the non-strategic policies in the Local Plan, will provide a robust planning framework for the future development and regeneration of the borough.

12. We note that the Draft Local Plan (LP03) contained a number of housing and employment allocations which have not been included within the Submission Plan. Can the Council provide some context by setting out the factors that led to the decision not to include allocations within the Plan.

Oldham Council Response

As set out in paragraphs 6.14 and 6.15 of the Setting the Scene Topic Paper ([PW07](#)), the role and purpose of the Oldham Local Plan has changed since preparation of, and consultation on, the Draft Local Plan. Further detail is included at paragraphs 7.11 – 7.14 explaining that, given the focus of the Oldham Local Plan is on non-strategic policies, it is not felt appropriate, or necessary, to allocate individual sites for housing and employment development.

The Council considers this to be in accordance with paragraph 11.3 of PfE, which states that *‘as appropriate, district Local Plans will allocate sites from this supply reflecting the distribution set out in tables 6.1, 6.2 and 7.2, to ensure that the spatial strategy can be met’*. Evidence of the borough’s housing and employment land supply, which demonstrates that the supply is sufficient to meet our needs and deliverable over the plan-period, is set out within the Housing ([HO01](#)) and Economy and Employment ([EO01](#)) Topic Papers.

In addition, paragraph 2.5 of the Plan ([SD01](#)) explains that the Council recognises that the recent planning reforms will require the preparation of a Spatial Development Strategy covering the Greater Manchester region. At an appropriate time, this will need to be supported by a new Local Plan for Oldham prepared under the new plan-making system. If needed, allocations will be considered as part of this future iteration of the Local Plan to support the Spatial Development Strategy for Greater Manchester.

Housing Delivery

13. Policy H1 reflects the housing requirement set out in Places for Everyone (PFE) which identifies that at least 11,560 homes are required in the Borough up to 2039. Para 8.7 in the Oldham Local Plan states that the SHLAA and brownfield register provide details of sites considered suitable, available and achievable for residential development, and should be used as a starting point to identify potential development sites. Para 11.3 states that district local plans will allocate sites from the existing supply identified in land availability assessments that are updated annually.
14. The Plan does not contain any allocations. Paragraph 2.4 of the Plan states “Instead, the Plan supports the delivery of our housing and employment land supply through the positive planning framework provided by the plan policies”. Doc SD016 states “the Council consider that, for the purposes of the Oldham Local Plan and given its focus on non-strategic development management policies, allocations in this instance are not required to provide additional policy direction for the Borough”.
15. The Regulation 22 Consultation Statement (page 36) advises that the Plan does not include site allocations because “Oldham’s identified land supply (including strategic allocations in Places for Everyone) is capable of meeting our requirements”. The evidence submitted provides information to support this case within the Strategic Housing Land Availability Assessment (SHLAA) (HO03) the Housing Topic Paper and Appendix refs (HO02 and HO03) and the Brownfield Register (HO07).
16. Table 4 of HO01 provides a breakdown of sites within the housing supply by planning status. This indicates that 60% of the estimated supply will come from sites that are not allocated, under construction or subject to an extant permission. To better understand whether the approach in the Plan is consistent with PFE and National Policy and whether the Plan strategy for delivering housing supply is a sound one, it would be helpful if the Council could provide some additional information to that provided in the SHLAA:
 - Please complete the attached template setting out the housing trajectory for the Plan period and the sources of delivery within it. The template covers a 15 year period from the point of adoption. Please can the Council indicate any proposed supply following the end of the plan period (2039 onwards) where known.
 - Please also complete the attached template for all sites within the housing supply including all sites which are included within the “Potential Sites” category. Where relevant please include any supporting information which has informed the Council’s judgement in relation to rates of, and point of, delivery. For sites identified within the five-year supply this should include clear evidence that housing completions will begin on site within five years. For sites within the stated supply which would not appear to be in accordance with the requirement of policy HO01 [LH3.1] that sites have a GMAL of 4 or more, the Council should document why the site would

nonetheless be considered to be acceptable for development and how a decision maker would apply HO01 in this context.

- To assess the Council's assumptions in relation to "potential and pending" sites we are interested in the nature of housing delivery in the borough in the last 10 years – particularly the proportion of sites brought forward that were not identified in either the LP or PFE. In this regard you may wish to supplement the information already provided to include available evidence on historic rates of supply from unallocated sites, particularly those outside Council ownership. This should include information on relevant factors which suggest a continued supply from unallocated sites, including, but not limited to, the involvement of the Council or other agencies in the development of sites. In this regard we note that HO02 and HO03 indicate that a number of large developments have recently been granted permission, some of which are on land within Council ownership, and the Council may wish to expand on how these developments are anticipated to come forward as part of the Borough's supply, with reference to past rates of development of Council owned sites and, where relevant the involvement of other Agencies in securing delivery.
- Please confirm whether there are any sites on the Brownfield Land Register (HO07) which are not replicated within the SHLAA Appendix 1 (HO02).
- The SHLAA contains a significant proportion of lapsed sites, some of which have previous permissions which are more than 10 years old. To provide some context to these sites please provide information on the lapse rate for development within the Borough over the past 10 years.
- In relation to the potential effectiveness of Policy HO01 to support the delivery of housing, please provide details of the numbers and proportion of housing proposals which have been refused against officer recommendation in the last 10 years.

Oldham Council Response

Housing Trajectory Template for the Plan Period

It has been agreed with the Inspectors that rather than completing a new template the Council could amend and provide additional information to that originally provided in the Housing Topic Paper Appendix 1 ([HO02](#)). In line with what was agreed, the Council provides an updated Appendix 1 as an appendix to this document (Appendix 2 of this document), which includes the following:

- Updates to the site status (column E) to reflect the current position.
- Annualised supply for each year (columns M, N and O in the original appendix broken down by year).
- Additional columns to identify potential housing land supply post 2039.
- Column AO 'Deliverability (update)' has been added to provide further information where known, and available, to further evidence deliverability and the sites inclusion within the housing land supply. The information provided is proportionate to the sites

position within the housing land supply (i.e. within the five-year supply or post-five-year supply). This information should also be considered in line with that provided below.

In line with what has been agreed, there are several caveats which are important to note in relation to the updated Appendix 1 provided. These are:

- This appendix document is based on the housing land supply position at 1 April 2025, with the updates as set out above only, as requested. As such, the other columns still remain relevant (unless stated otherwise as per column AO (Deliverability update) and are the position as at 1 April 2025.
- The deliverability column has sought to provide additional information where it is known and available (including information provided by the Council's Housing Delivery Team). However, housing land supply is changeable and as such the information represents that which is the best available and known at a point in time.
- Likewise, column E represents the site status as identified at 1 April 2026 in the main. However, where known, updates since April 2026 have been provided. These mainly relate to major housing sites which are known to have received planning permission since April 2026.
- Given the above and as stated, the changeable nature of housing land supply, many (new) sites will have also received planning permission since the 2025 position. These are not included within the above. There have been approximately 58 sites which have gained planning permission since 2025. Four of these sites were previously identified in the Housing Topic Paper Appendix 1 as 'potential and pending / unpermissioned' (site references SHA0021, SHA1759, SHA2000 and SHA2001) and now have planning permission for over 1,600 homes. The remaining 54 sites are new to the supply and have planning permission for 222 homes in total. In addition, there are 14 sites which are also new to the supply and are now under construction for 39 homes in total. In total, excluding the four sites previously identified, there are 68 new sites which have either extant planning permission or are under construction. In the main these would be identified within the five-year supply.

"Potential Supply" Template and GMAL 4 or more

See answer to question 16 bullet 1 above. Potential sites were included within the original Appendix 1 ([HO02](#)) as sites with a 'SHA' prefix. As requested, the updated Appendix 1 includes column AO 'Deliverability (update)', which has been added to provide further information where known and available to further evidence the sites inclusion within the housing land supply. This information is considered as proportionate to the sites position within the housing land supply (i.e. within the five-year supply or post-five-year supply).

In terms of general rates of delivery, as shown in table 1 below, on average over a 10-year period, less than 12% of all sites which have been granted planning permission have lapsed. Meaning that over 88% of sites granted planning permission in this period have come forward (to have either completed or are under construction).

Annual housing delivery assumptions within the housing land supply (Housing Topic Paper Appendix 1 ([HO02](#))) are generally informed by past build-out rates on sites within the borough (i.e. how many homes are completed per annum on sites on average). Table 1

below sets out the overall build-out rates which have informed the housing land supply annual delivery assumptions in this Appendix. It should be noted however, that annual delivery rates presented in the housing land supply are indicative and subject to change. This is particularly relevant to the medium- and long-term supply, where information is more limited and therefore assumptions have been made regarding delivery and completion years.

Where information is available, annual housing delivery assumptions have been informed by phasing information provided by the developer, that provided as part of the planning application, or information from the Councils Housing Delivery Team.

Table 1: Lead-in times and build out rates

Size of Site (dwellings)	Time (months) from planning permission to first commencement (average)	Average time (months) from planning permission to site completion	Average time (months) from commencement to completion	Average no. of dwellings completed p.a (overall)
100+	11	56	47	49
50-99	9	44	30	44
20-49	11	30	19	32
10-19	13	31	20	12
6-9	16	36	21	8
0-5	14	30	20	2
<i>Average</i>	<i>12</i>	<i>38</i>	<i>26</i>	<i>25</i>

As shown in table 1, on average, sites start within 12 months of gaining permission (in some cases sites must obtain a secondary permission i.e. reserved matters following outline permission and can therefore take longer to start). There is limited difference between minor sites and major sites in this regard – major sites tend to start slightly quicker than minor sites. The average time from planning permission to completion is generally slightly quicker for smaller sites, as is the time from commencement to completion. Overall, smaller sites tend to deliver less dwellings per annum than larger sites, although this is to be expected as many small sites are delivered by individual or smaller developers. Lead-in times and build-out rates may differ to those set out within table 1 for particular types of development i.e. high-rise apartment only schemes, schemes within town centres, or those for specialist types of housing i.e. homes for older people, student accommodation or support housing.

In relation to GMAL, 34 of the 69 sites with a GMAL of less than 4 have extant permission and as such, the policy requirement in Policy H1 does not apply to these sites. Sustainability and transport accessibility will have been assessed as part of the application. If planning permission were to lapse on these sites (and policy H1 was adopted) the below would be applicable.

Policy H1 sets out that ‘All residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL)⁴ 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

⁴ Footnote 26 – “Or any future measures of accessibility that become available and are relevant to assessing the accessibility of development.”

the development provides exceptional benefits to the surrounding environment and community.’.

In this context, where a site would have a GMAL score of less than 4, the final sentence is of relevance, whereby the applicant should evidence exceptional benefits of the development to the surrounding environment and community. This evidence should then be considered by the decision-maker.

It should be noted, also, that GMAL is a measure of public transport accessibility as it stands at the point of the assessment. GMAL will be updated regularly to take account of changes to, and new, public transport provision and accessibility⁵. As such the GMAL score of sites in the housing land supply is likely to change over time.

Moreover, the development of sites may, due to other requirements within the Local Plan and PfE, improve public transport accessibility themselves. This can also be considered in terms of demonstrating that the development provides ‘exceptional benefits’ in line with Policy H1. For example, PfE Strategic Allocations JPA12, JPA13, JPA14 and JPA16 all have a GMAL score of less than 4. This is due to their former Green Belt / Other Protected Open Land status – meaning they are generally located outside of the urban area and as undeveloped land were not well served by public transport in general. However, the Strategic Allocation policies within PfE for each allocation require that development of the site make provision for new and improved sustainable transport and highways infrastructure having regard to the indicative transport interventions set out in Appendix D of PfE in accordance with PfE Policy JP-C8 and enhances cycling and walking links, including as part of Green Infrastructure. Policy JP-C8 requires that new development is located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.

In addition, Policy T1 of the Local Plan aims to improve connectivity and accessibility across Oldham and sets out that: the Council will seek developer contributions, where appropriate, towards the provision or enhancement of highway, public transport and / or active travel schemes; and the Council will support improvements to our public transport network and facilities to promote more sustainable transport choices and reduce reliance on private motor vehicles. As such, other policies within PfE and the Local Plan may improve the public transport accessibility of individual sites, resulting in an improved GMAL score.

GMAL is considered an appropriate measure for the Local Plan to ensure new development is sustainable and accessible by public transport due to the similar application of GMAL in PfE. PfE used GMAL as an evidence tool to assess sites and in PfE Policy JP-H4 (ensuring development density reflects sites accessibility, including to public transport). However, it is also possible that measures of public transport accessibility may change over the lifetime of the plan, with new tools developed to replace GMAL. This is recognised by footnote 26 within Policy H1 and 8.11 of the policy reasoned justification, which support the use of updated measurements of transport accessibility.

⁵ [GM Accessibility Levels \(GMAL\) - National Data Library](#)

Nature of housing delivery in the borough

Table 2 below compares the number of homes delivered on housing allocations (Saved UDP allocations and PfE Strategic Allocations) each year compared to the number of homes delivered on non-allocated sites and the total number of homes delivered each year in the borough over a ten-year period.

Table 2: Number of dwellings delivered on allocated sites compared to dwellings delivered on non-allocated sites by year (2016/17 to 2025/26)

Year	Total number of dwellings delivered	Number of dwellings delivered on allocated sites	Number of dwellings delivered on non-allocated sites	Dwellings delivered on allocated sites compared to the total number of dwellings delivered each year	Dwellings delivered on non-allocated sites compared to the total number of dwellings delivered each year
2016/17	374	21	353	6%	94%
2017/18	345	50	295	14%	86%
2018/19	410	85	325	21%	79%
2019/20	728	1	727	0.1%	99.9%
2020/21	373	30	343	8%	92%
2021/22	506	0 ⁶	506	0%	100%
2022/23	403	2	401	1%	99%
2023/24	420	58	362	14%	86%
2024/25	578	48	530	8%	92%
2025/26	456	30	426	7%	93%
Total	4,593	325	4,268	7%	93%

⁶ 77 dwellings were delivered on Hebron Street in this year, which is part of the JPA12 Broadbent Moss PpE Strategic Allocation now, though this was not an adopted allocation at the time of completion.

As shown in table 2 above, over the ten-year period only 7% of all dwellings delivered have been delivered on allocated sites, with 93% of dwellings delivered on non-allocated sites. This shows to date that only a limited portion of our housing land supply comes forward on allocated sites. The SHLAA assessment is updated each year and provides a full assessment of future housing land. It is supplemented by several appendix documents and an online web map of the sites. The Brownfield Land Register is also updated annually, as a sub-set of the SHLAA, alongside an online web map of the sites. Together these documents promote the available housing land in the borough.

Whilst many homes delivered over the past 10 years have been on privately-owned sites, the Council support the delivery of sites either in private ownership or in their ownership in several ways, as discussed below.

The Council has a residential disposal programme and housing pipeline that identifies sites suitable for residential development. The pipeline includes an indicative capacity of over 4,400 homes across 43 sites. There are currently 20 sites in delivery, or with development partners selected, that collectively will deliver around 2,700 homes – this includes numerous sites within the five-year housing land supply as identified in the Housing Topic Paper Appendix 1 update (see answer to question 16 bullet one).

MUSE were selected as the Preferred Development Partner for the Town Centre by the council in [June 2023](#) and have produced a [Development Framework](#) which aims to deliver over 2,000 homes in Oldham Town Centre.

MUSE secured Planning Permission on four key Council-owned town centre sites in July 2025, totalling 1,609 homes (site references HLA4309 Civic Centre, HLA4310 Prince's Gate, HLA4311 Former Leisure Centre and HLA4312 Former Magistrates Court). The first scheme at Princes Gate (HLA4310) is currently under construction (post April 2026), with Phase 1 consisting of 75 apartments for Legal and General Affordable Homes. This site is mostly within the five-year land supply, whilst a small portion of HLA4309 (Civic Centre) is also within the five-year land supply as the first phase is expected to start in the next couple of years.

The Council also work with private developers and Registered Affordable Housing Providers to meet its housing targets. As well as the partnership with MUSE, the Council also has a Joint Venture arrangement with Grasscroft Seddons at Broadway Green (site references HLA3263.1 and HLA3263.3) which has seen over 434 new homes built in the last 10 years, with approximately 127 homes still to deliver up to 2028/29. Other Council-owned sites are normally sold on an individual basis through a competitive land sale exercise to select a development partner.

Key partners in housing delivery include the Homes and Communities Agency (HCA) and Greater Manchester Combined Authority (GMCA) who work with the Council, Registered Affordable Housing Providers and private developers to help unlock sites

and provide financial support via funding streams such as the Good Growth Fund, the Brownfield Housing Fund and the Social and Affordable Homes Programme.

The Council also works proactively with landowners to bring sites forward for housing delivery. Recent examples include:

- Southink (site reference SHA2016) which is identified in Appendix 1 (2025) as a potential and pending site, as this was the status it had at the time of assessment – which is owned by the Council and TfGM and has recently received planning permission (September 2026) for 147 affordable homes; and
- Beal Valley/ Broadbent Moss (PfE Strategic Allocations JPA10 and JPA12) which have several landowners, including the Council. The Council are actively working with the developer consortium to support the delivery of this site. Planning applications have recently been received for two parts of these allocations (FUL/356549/26 – 192 homes, and FUL/355603/26 – 248 homes). A portion of these allocations are identified within the five-year supply according to the anticipated phasing of the allocations.

Housing Topic Paper Appendix 1 2025 update (see answer to question 16 bullet 1) provides further information about the delivery of Council owned sites.

Sites on the Brownfield Land Register not replicated within the SHLAA

Housing Topic Paper Appendix 1 ([HO02](#)) contains the Housing Land Supply as at 1 April 2025 and includes 416 sites. The Brownfield Land Register ([HO07](#)) is a sub-set of the SHLAA and includes sites based on the regulations⁷. The 2025 Brownfield Land Register includes 190 sites.

There are 11 instances where a site reference appeared in the Brownfield Register but not in [HO02](#). However, for some the site is included in [HO02](#) but is recorded under a different reference number to the Brownfield Register⁸. The reasoning for the differences are set out in table 3 below.

⁷ The Town and Country Planning (Brownfield Land Register) Regulations. Please see the Council's Brownfield Land Register webpage for further information of which sites are included on the Register: [Oldham Council Brownfield Land Register: Methodology 2025 | Oldham Council Brownfield Land Register: Methodology 2025 | Oldham Council](#)

⁸ For information Oldham's housing monitoring follows a process whereby sites which are identified as 'Potential/ Pending' (i.e. sites with no previous planning history) have a 'SHA' prefix and sites which have planning permission (and those that are under construction), and sites with a planning history (i.e. where planning permission has lapsed) have a 'HLA' prefix. This is mainly due to which internal monitoring database the site is within but it explains why the same site may gain a different reference number over time.

Table 3: Brownfield Land Register/ HO02

Site Reference (as it appears in the Brownfield Land Register)	Site name	Reason for not appearing in Appendix 1
HLA2662	Land at North Werneth Zone 6 (Hartford Mill, Edward St)	The Brownfield Land Register includes HLA2662 and HLA2663 as a joint entry. However, for clarity HLA2662 was combined with HLA2663 to form one site identified as HLA2663 in the SHLAA/ Appendix 1. It still covers the same site area that both HLA2662 and HLA2663 did, but it now better reflects that the site will be delivered as one site to reflect the sites extant planning permission (OUT/353664/24).
HLA2664, SHA0899 and SHA1630	Land at Derker (Abbotsford Road Site), Abbotsford Road/Vulcan Street, Derker, Oldham (HLA2664), London Road, Derker (SHA0899) and Former Cromford Mill site, Oldham (SHA1630)	These sites now appear in the SHLAA/ Appendix 1 as HLA4238 given that the sites now have planning permission under a single permission (FUL/350118/22). The notes column in the Brownfield Land Register explains this for each of these sites. This was unchanged to ensure continuity and to show the progress of sites over time.
HLA2842	Land off Hale Lane/Hughes Close, Failsworth, Manchester	Site is complete (end-date column should be completed). Will be amended at next update.
HLA3283	Land north of Sugar Lane, Dobcross, OL3 5AG	Site is complete (end-date column should be completed). Will be amended at next update.
HLA3898	572 Ashton Road, Oldham, OL8 3HW	Permission expired and site is no longer considered deliverable. This is an error and will be removed from the Brownfield Land Register at the next update.
HLA3944	17 - 21 Mumps Oldham Oldham OL1 3TL	Permission expired and permission is no longer considered deliverable. This is an error and will be removed from the Brownfield Register at the next update.

Site Reference (as it appears in the Brownfield Land Register)	Site name	Reason for not appearing in Appendix 1
HLA4066	Ambulance Station Former, Moor Street, Shaw Oldham OL2 7BE	This is an error and will be removed from the Brownfield Land Register at the next update.
SHA2149	Land fronting Horsedge Street, including Temperence Hall	This is an error and will be removed from the Brownfield Land Register at the next update.
SHA2163	Land at Foundry Street, Oldham	Identified as HLA4237 in the SHLAA/ Appendix 1 given that is now has planning permission (FUL/352158/23). This is explained in the notes column of the Brownfield Land Register.

Lapse rate

Table 4 below sets out the lapse rate of dwellings on development sites over a 10-year period (2014/15 to 2023/24). Years 2024/25 and 2025/26 are excluded from the table because the planning permission for sites granted permission within these years will still be extant and as such no lapse rate is available.

It should be noted that some sites (homes) granted planning permission within 2023/24 still have extant permission (at September 2026). Initial checks have been carried out for any sites where permission was due to expire between 1 April 2026 and September 2026 and no start has been recorded. However, full assessment, including site visits etc. are done at year-end and so some sites may have progressed. For the purpose of this response, where the initial checks have identified that a site's planning permission has expired (and not been implemented) it has been recorded as such.

Table 4: Lapse rate for dwellings permitted within Oldham each year (2014/15 to 2023/24)

Year	Number of dwellings permitted on development sites ⁹	Number of dwellings lapsed on development sites	Lapse rate (%) ¹⁰
2014/15	695	49	7
2015/16	553	50	9
2016/17	880	256	29
2017/18	512	72	14
2018/19	274	21	8
2019/20	517	81	16
2020/21	405	51	13
2021/22	820	66	8
2022/23	1,439	108	8
2023/24	404	13	3
Total	6,499	767	11.8%

As shown in table 4, the lapse rate in the borough is generally low – less than 12% across the 10-year period shown. It can be variable year-on-year, as shown. However, the table shows that on average over 88% of dwellings which were granted planning permission on development sites in Oldham, over this 10-year period, came forward.

Housing proposals refused against officer recommendations

Between 1 April 2016 and 31 March 2026 there have been 22 applications for housing which have been refused at planning committee against officer recommendation. However, of these 22, 9 applications were then allowed at appeal. It should also be noted that the majority of the refused applications were before 2019 – since then one application was refused at appeal and one allowed at appeal. Table 5 below sets out the application details.

⁹ The permitted year is taken as the latest/ most recent 'development enabling' planning permission i.e. the reserved matters permission date will be recorded, rather than the year an outline permission was granted, for example.

¹⁰ The lapse rate is the percentage of the number of dwellings which have lapsed (i.e. planning permission has not been implemented and has expired) on sites which have been granted planning permission in each given year.

Table 5: Applications for housing refused against officer recommendation 2016 to 2026

Planning Application Reference	Proposal	Decision Date	Appeal Reference/ Decision	Appeal Decision Date
PA/337969/16	1. Basement extension for toilets to serve a cafe, 2. Change of use of first floor and part of ground floor to residential, 3. Construction of dormer extension.	22/04/2016	N/a	N/a
PA/337916/15	Conversion of existing warehouse to eight apartments and erection of a two-storey building to accommodate two apartments (a total of ten apartments are proposed), with access through the garage colony to Crossley Street (garages to remain intact).	22/07/2016	APP/0001089/15 – Appeal allowed	12/07/2017
PA/338476/16	1) Change of Use from Beauty Salon (Sui Generis) to a House of Multiple Occupation (Use Class C4) 2) Replacement of shop frontage with new window and door 3) Erection of a new front boundary wall.	22/07/2016	N/a	N/a
PA/338432/16	Outline application for residential development of up to 5 dwellings (access applied for with all other matters reserved).	22/07/2016	APP/0001104/16 – Appeal allowed	12/01/2017
PA/338156/16	1. Change of use of building and part of former car park from Use Class A4 (drinking establishment) to Use Class C3 (Dwellinghouse), 2. Erection of disabled single storey rear extension 3. Change of use of part of former pub car park to car valeting use Use Class B1 (Business); 4. Erection of 1.5 metre high boundary wall around residential area. 5. Erection of 2.1 metre high fencing around car valeting area.	26/08/2016	N/a	N/a
PA/338917/16	Outline application for residential development of up to 23 dwellings (use class C3) with all matters reserved except access.	18/11/2016	APP/0001119/16 – Appeal allowed	04/12/2017

Planning Application Reference	Proposal	Decision Date	Appeal Reference/ Decision	Appeal Decision Date
PA/338855/16	Erection of 2 no. detached dwellings (Resubmission of PA/338555/16).	18/11/2016	APP/0001117/16 – Appeal allowed	28/03/2017
PA/338051/16	Erection 64 bed residential home for the elderly (use class C2).	18/11/2016	APP/0001092/16 – Appeal allowed	31/03/2017
PA/339868/17	Conversion of agricultural barn into a dwelling (Resubmission of PA/338257/16)	20/04/2017	APP/0001162/17 – Appeal dismissed	04/09/2017
PA/340334/17	Erection of a single detached bungalow and associated works.	14/11/2017	APP/0001185/17 – Appeal allowed	04/06/2018
PA/341082/17	Outline Application with all matters reserved for one no. detached dwelling on land to the rear of 141-145 Manchester Road.	06/03/2018	APP/0001208/17 – Appeal dismissed	28/11/2018
PA/341827/18	Erection of a single detached dwelling to replace a former commercial storage building alongside an associated outbuilding, garden and parking area.	19/07/2018	N/a	N/a
PA/341496/18	Change of use from C3 dwelling to 7 no. bedroom HMO with infill extension on the rear ground floor.	19/07/2018	APP/0001221/18 – Appeal allowed	04/02/2019
PA/341119/17	Change of use of first and second floor from a night club (Sui Generis) and pub (A4 Drinking establishments) to 11 no. apartments (C3 Use Class) and self-storage units (B8 Storage or distribution).	20/07/2018	APP/0001209/17 – Appeal allowed	20/12/2018
PA/341965/18	Reserved matters application for 4 no. dwellings (approval of appearance, landscaping, layout and scale) following outline permission for residential development approved under application no. PA/337274/15. Revised application relating to PA/340209/17.	14/08/2018	N/a	N/a
PA/341410/18	Erection of four, three storey dwellings, and associated tree felling and landscaping.	21/09/2018	N/a	N/a

Planning Application Reference	Proposal	Decision Date	Appeal Reference/ Decision	Appeal Decision Date
PA/340887/17	Hybrid Planning Application comprising of: Part A - Full Planning Application for the development of a new link road between Knowls Lane and Ashbrook Road and associated works, and Part B - Outline Planning Application for the development of up to 265 dwellings, open space and landscaping, with all matters reserved except for access.	07/12/2018	APP/0001200/17 - Appeal withdrawn/ unknown	03/07/2019
PA/340209/17	Reserved matters application for 4 .no dwellings (approval of appearance, landscaping, layout and scale) following outline permission for residential development approved under application no. PA/337274/15.	26/06/2018	APP/0001174/17 – Appeal dismissed	09/10/2018
PA/341467/18	Erection of 17 houses with vehicular access from Medlock Road.	15/02/2019	N/a	N/a
PA/341416/18	Erection of 77 dwellings, open space, associated works and infrastructure.	08/04/2019	N/a	N/a
FUL/347100/21	Change of use of residential dwelling (Class C3) to residential institution (Class C2), single storey and first floor rear extensions.	21/10/2021	REF/0084/22 – Appeal dismissed	20/06/2022
FUL/352308/24	Erection of one detached dwelling and installation of dropped kerb.	10/06/2024	REF/0223/25 – Appeal allowed	03/06/2025

Employment

17. The Plan does not allocate any sites for employment but relies on a number of existing employment allocations as part of the employment land supply. The Employment Land Review (ELR) (EE03) contains a quantitative review and concludes sufficient supply is available within former allocations, PFE and extant permissions to meet the identified need. Please clarify whether these existing allocations are to be carried forward as part of this Plan and to what extent the supply relies on “unpermissioned” sites or sites identified for allocation within the Draft Local Plan (LP03). Furthermore, can the Council direct us to where we would find an up-to-date qualitative assessment of this supply to support the continued inclusion of historic allocations within the supply?

Oldham Council Response

Existing saved UDP allocations are not being carried forward as allocations in this Plan. As set out in paragraph 2.4 of the Publication Plan ([SD01](#)), this Plan does not include allocations for future development. In addition, Appendix 2 of the Plan ([SD02](#)) contains maps illustrating the de-designation of these allocations.

The employment land supply as at 1st April 2025 is set out in Appendix 1 of the Economy and Employment Topic Paper ([EE02](#)), and the split is as follows:

Table 6: Employment Land Supply site type

	Saved UDP allocations (no planning permission)	PfE allocations (no planning permission)	Sites with planning permission	Sites under construction	Total
Square metres	40,548	136,720	80,394 ¹¹	27,908	285,570
Percentage	14	48	28	10	100

The table above shows that 14% of the supply is made up of unpermissioned ‘saved UDP allocations’.

An up-to-date qualitative assessment of the supply has not been carried out. The approach taken has been informed by desktop assessments, the Council’s monitoring processes (including the monitoring of planning permissions and site completions), site visits and officer knowledge of the employment land supply. Until

¹¹ This includes two sites with a capacity of 14,480sqm that are also saved UDP allocations.

de-designated through the Local Plan review the Council's view is that it is appropriate to keep these sites as existing saved UDP allocations within the supply. The Council considers that the approach is robust and proportionate for Oldham's Local Plan.

18. Similarly, while EE03 and the Economy and Employment Topic Paper (EE01) include commentary on the proposed Business and Employment Areas (BEAs), this focuses on changes to the areas since designation in the current adopted plan. Please can the Council advise on whether a qualitative assessment of the proposed BEAs has been carried out, or is proposed, including details of which BEAs may have scope for further intensification. If the Council has carried out an informal qualitative assessment it would be helpful if this was drawn together as a supplement to the Employment Topic Paper.

Oldham Council Response

A qualitative assessment of the BEAs, including those which may have scope for intensification, has not been carried out. The most up-to-date information available is contained within the Employment Land Review (ELR) Part One ([EE03](#)) and the Economy and Employment Topic Paper ([EE01](#)). The approach taken has been informed by desktop assessments, the Council's monitoring processes (including the monitoring of planning permissions and site completions) and is based on officer knowledge of the BEAs. The Council considers that the approach is robust and proportionate for Oldham's Local Plan.

19. It would also be helpful if the Council could provide an indication of which sites in the list of Employment Land Supply (EE02) fall within a BEA (if any).

Oldham Council Response

Details of the sites in the Employment Land Supply ([EE02](#)) that fall within a BEA is provided in table 7 below. This equates to 44% of the Employment Land Supply.

Table 7: Sites in the Employment Land Supply that fall within a BEA

Employment Land Supply Reference	Site Name	BEA Reference (Publication BEA Ref)	Hectares	Square Metres
OLD0005	Land at Mersey Road North/Albert Street, Failsworth, Oldham	Hollinwood BEA (BEA 12)	0.57	3,720
OLD0006	Sellers Way	Hollinwood BEA (BEA 12)	0.93	3,960
OLD0008	Land at Greengate, Chadderton	BEA 3	1.19	4,880
OLD0051	Foxdenton	Foxdenton BEA (BEA 13)	5.1	20,080
OLD0075	Sefton Street	Hollinwood BEA (BEA 12)	2.5	9,600
OLD0077	Royton Moss	BEA 7	5.2	7,680
OLD0084	Land at Meek Street	BEA 7	4	12,000
OLD0135	Land to the west of Greengate	BEA 3	3.3	13,178
OLD0156	Plot 21 Grimshaw Lane	BEA 3	0.5	1,040
OLD0163	Barrett Engineering Steel North West	BEA 7	0.021	164
OLD0167	Unit M Westwood Ind Estate	Chadderton Technology Park (BEA 14)	0.2	450
OLD0170	Land Adjacent To Junction 22 Business Park	Hollinwood BEA (BEA 12)	0.88	1,680
OLD0172	Land East of Albert St, Failsworth, Oldham	Hollinwood BEA (BEA 12)	6.21	18,160
OLD0174	Land To The West Of Leonard Way	BEA 7	4.8	11,110
OLD0176	Land At Rutland Mill	BEA 9	0.33	1,070
OLD0179	Hawksley Industrial Estate	BEA 2	0.2	494
OLD0180	Gladstone Business Park	BEA 10 (BEA 11)	0.087	238
OLD0184	Land at Broadway Green (Plot 2000)	Foxdenton BEA (BEA 13)	2.638	14,566
OLD0185	Amber House	Chadderton Technology Park BEA (BEA 14)	0.4	730
OLD0187	Hopkinson And Hopwood	BEA 7	0.5	703

20. With regard to the employment land requirements in EE03, we note that these are derived using a proportion based on Oldham's share of supply from PFE

tables 6.1 and 6.2. Can the Council confirm whether the relevant requirement figures for office and industry/warehousing as set out in PFE policies JP-J3 and JP-J4 included any authority level disaggregation, and if so, please can this information be provided.

Oldham Council Response

The requirement figures in PFE JP-J3 and JP-J4 did not include any authority level disaggregation.

Paragraphs 6.26 and 6.38 of PFE, which relate to JP-J3 and JP-J4 respectively, state: 'The approach of this policy is to allow each authority to take local circumstances into account when drafting the District Local Plans.' The paragraph's go on to say that to ensure the overall strategy is being adhered to, there will be a need for monitoring at the Plan, district and spatial strategy level to ensure the existing supply, including allocations, is providing sufficient land to meet quantitative and qualitative needs.

As set out in the Economy and Employment Topic Paper ([EE01](#)) paragraphs 4.9 and 4.10, to ensure that Oldham makes a sufficient contribution to meeting the overall employment requirements identified in JP-J3 and JP-J4 an appropriate methodology has been applied to determine an Oldham employment floorspace requirement.

21. We also note that the same plot ratio of 40% has been applied to both office and industrial/warehousing uses. Please can the Council provide justification for the plot ratios used, and whether any consideration was given to using different ratios for any of the uses involved?

Oldham Council Response

Where a site in the employment land supply has planning permission and the breakdown of floorspace by use type has been provided, the capacity and split relates to the use type which was granted.

Where sites in the supply are unpermissioned or are sites that have been granted permission for a mix of office, industry and warehousing, a standard plot ratio of 40% has been applied. This assumes that a building will occupy 40% of the total plot of employment land, with the remainder of the site taken up with car parking, landscaping and other ancillary uses for example.

The Council recognises that, in practice, plot ratios can vary between different employment uses and individual developments. Modern warehousing developments may achieve higher site coverage in some circumstances, whilst office developments can vary significantly depending on their scale, parking requirements and site constraints. However, for several sites in our supply, there is no certainty regarding

the specific form, density or operational requirements and therefore the use of a common 40% plot ratio was considered to represent a reasonable mid-point assumption.

In addition, paragraph 6.9 of the ELR Part One ([EE03](#)) acknowledges the above stating that office developments generally occupy less space than industrial and warehousing units, particularly within centres. However, to date, the sites within Oldham's ELS rarely fall in the borough's centres - in Oldham's Employment Land Supply ([EE02](#)) there was one site located in Oldham Town Centre and this was for the conversion of a former bank into office space and has since expired. Therefore, in the absence of any national standards on plot ratios, it is assumed the level of car parking and other infrastructure requirements required for the offices in Oldham's supply would be similar to other employment uses that are located outside of our centres and therefore a 40% plot ratio is considered an appropriate approach.

It is important to note that the capacities identified do not preclude floorspace being increased on sites, nor does it mean that the plot ratios envisaged within the assessment would be appropriate, these would need to be assessed through the normal planning process when submitting a planning application.

22. Paragraph 4.18 of EE01 assumes a 50/50 split between office and industrial/warehousing uses where a site forming part of the proposed employment land supply has mixed use permission. This differs to the method used for deriving the figures in Table 1 of EE03 which assumes 1/3 office and 2/3 industrial on such sites (as explained at paragraph 6.3 of EE03). Please can the Council provide justification for the difference in approach for disaggregating mixed use supply?

Oldham Council Response

In responding to this question, the Council acknowledge that an explanation is required, in the Economy and Employment Topic Paper ([EE01](#)), regarding the change in methodology, and have set this out below.

The methodology that was set out in the Part One Employment Land Review ([EE03](#)) is not the methodology that has been used to inform the Submission Local Plan. At the time of writing and preparing the evidence for the Draft Local Plan (including [EE03](#)), PfE had not yet been adopted. As such, there was not an overall requirement for the 9 PfE districts. The methodology applied at Draft Plan stage therefore used Oldham's past employment land take up rates to ascertain an annual average of completions to determine a potential requirement up to 2039.

Upon PfE being found sound, it was decided to not use the methodology set out in EE03, but to instead use a methodology that would apportion Oldham a percentage of the overall PfE requirement as set out in paragraphs 4.10 – 4.13 of document [EE01](#). This methodology is considered a more measurable way of monitoring Oldham's contribution to the overall PfE requirement.

Appendix 1 – Addendum to the Statement of Co-operation (including Statement of Common Ground) (14 August 2026) (SD012)

Contained in a separate document

Appendix 2 – Publication Plan Housing Topic Paper Appendix 1 2025 update

Contained in a separate document