



Oldham Local Plan Examination

Matters, Issues and Questions

20 October 2026

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1. This document sets out Matters, Issues and Questions (MIQs) on the submitted Oldham Local Plan: Publication Plan document (the Plan) [SD01-SD02]. They will inform the hearing sessions which are due to start on 8 December 2026.
 2. Please see the enclosed 'Hearings Programme' for details of the hearing dates. Further information on the examination process is set out in the accompanying 'Examination Guidance Note'.

Written Statements

3. In order to ensure the hearing events are focused, representors are invited to respond to the questions in this document. Written statements should be submitted to the Programme Officer by **Thursday 19 November 2026 (by 17:00)**, via the above email and postal address. Late responses and further documents received after this date will not be accepted.
4. Participants should only respond to the questions which directly relate to their previously submitted written representations on the Plan. Please clearly indicate in your statement(s) the question(s) you are answering.
5. You may choose to respond to all or some of the questions. There is no requirement to submit a hearing statement, and you may wish to rely on your original representations to the Plan. All previous written representations on the Plan will be taken into account.
6. In responding to questions regard should be had to the Council's response to comments on the Plan [SD010].
7. Statements should be proportionate in length to the number of questions being answered and should not, in total, exceed 3,000 words per Matter. Extensive appendices will not be accepted. Separate statements should be submitted on each Matter. The Council's hearing statements should cover every question and respond to objections made at the submission Plan stage. The word limit does not apply to the Council as they are required to respond to every question.

8. We are examining the Plan as submitted by the Council. Therefore, we will not, at this stage, be considering the merits of sites for development not included in the plan ("omission sites"). Should we determine that there is a need for additional or different sites to be allocated, we will, in the first instance, ask the Council to consider how they would wish to proceed with the Examination.
9. The questions concerning soundness are primarily focused on the plan's policies. Insofar as they relate to the plan's soundness other elements of the plan, including the supporting text, will be considered as part of the discussion of the relevant policies.

Evidence documents

10. The submitted Local Plan and other evidence documents can be viewed on the Council's examination webpage in the Local Plan Examination Library. A number of new documents have been added in the last few months, including Initial Questions from the Inspectors (and the Council's responses).

The hearing sessions

11. The hearing sessions are due to start on 8 December 2026 and will run for 2 weeks. It is intended to hold the sessions at the Council Offices, Spindles Shopping Centre, Oldham, OL1 1LF.
12. If you wish to speak at the hearing sessions you will need to contact the Programme Officer by email/in writing by **Thursday 26 November 2026 (17:00)**. You should indicate:
 - Which matter/question number this relates to, and
 - Who you are representing (where relevant)
13. Alternatively, you may prefer to watch the hearing sessions, rather than take an active part in the discussions. If you wish to observe any of the sessions, could you please notify the Programme Officer by the same date and respond to the questions above.

Further information

14. Please check the Council's examination website for regular updates regarding the timing and format of the hearings.
15. If you have any questions about this document or the hearing sessions, please contact the Programme Officer.

Anne Jordan

Ben Johnson

Oldham Local Plan Examination Provisional Hearings Programme (may be subject to change)

Week 1		
	Morning session	Afternoon session
Day 1 8 December 2026	Opening statements Matter 1 – Legal and procedural compliance	Matter 1 - Legal and procedural compliance cont... Matter 2 – Vision, Objectives and Purpose of the Plan
Day 2 9 December 2026	Matter 3 – Housing policies (including housing land supply)	Matter 3 - Housing policies (including housing land supply) cont...
Day 3 10 December 2026	Matter 6 – Infrastructure and delivery policies Matter 7 – Transport policies	Matter 7 - Transport policies cont...
11 December 2026	Reserve session	Reserve session

Week 2		
	Morning session	Afternoon session
Day 4 15 December 2026	Matter 4 – Employment and retail policies Matter 5 – Oldham Town Centre policies	Matter 5- Oldham Town Centre policies cont...
Day 5 16 December 2026	Matter 9 – Design and Historic Environment policies Matter 11 – Communities and Local Environment policies	Matter 11 – Communities and Local Environment policies cont...
Day 6 17 December 2026	Matter 10 – Climate Change policies Matter 8 – Biodiversity and Natural Environment policies	Matter 8 – Biodiversity and Natural Environment policies cont... Matter 12 - Monitoring
18 December 2026	Reserve session	Reserve session

Matter 1 - Legal and procedural compliance

Issue 1: Has the Council complied with all relevant procedural and legal requirements in the preparation of the Local Plan?

- 1.1. Annex 1 of the National Planning Policy Framework (December 2024) sets out transitional arrangements for plans that include 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. Places for Everyone (2022-2039) (adopted 21 March 2024) (PFE) [PW09] would constitute a 'preceding local plan' in this context; this document was examined under the 2021 Framework. As a result, does the 2021 Framework constitute the relevant previous version of the Framework for the purposes of the Oldham Local Plan examination (as per paragraph 235 of the 2024 Framework)? Are there any subsequent iterations of the Framework that would also provide context for the examination?
- 1.2. Does the Plan clearly distinguish between strategic and non-strategic policies? Are there any policies that should be identified as strategic in line with the definition set out in national policy?
- 1.3. Is the Plan consistent with PFE [PW09] which forms part of the Development Plan for the authority's area?
- 1.4. Has the Plan been prepared in accordance with policy in the Framework that seeks to ensure effective and ongoing joint working?
- 1.5. Has the Plan been prepared in accordance with the adopted Local Development Scheme [PW011]?
- 1.6. Has consultation on the plan been carried out in accordance with the Council's Statement of Community Involvement [PW010] and the requirements of the 2004 Act (as amended) and the 2012 Regulations?
- 1.7. Does the Integrated Assessment (IA) [SD05 to SD08] provide a comprehensive and robust basis to inform the strategy and contents of the Plan¹, particularly in terms of:
 - a) its assessment of the likely effects of the plan's policies and allocations?
 - b) its consideration of reasonable alternatives?
 - c) its explanation of why the preferred approach and policies were selected?
 - d) its assessment of the amount of development that would arise as a result of the provisions in the Plan?
- 1.8. Is the Habitats Regulations Assessment adequate and does the Plan include all the recommendations identified in the assessment as necessary to ensure compliance with the Habitats Regulations? Is it robust and convincing in its conclusion that the Plan will have no significant effects on the integrity of any European sites?

¹ Note: This question focuses on the legal compliance of the IA in broad terms. The implications of the IA for the soundness of the plan are considered under other Matters.

- 1.9. How have issues of equality been addressed in the Local Plan?
- 1.10. In accordance with the requirements of Section 19 of the 2004 Act, does the Plan include policies:
 - a) to address the strategic priorities for the development and use of land in Oldham? How are these identified in the Plan?
 - b) designed to ensure that the development and use of land in Oldham contributes to the mitigation of, and adaptation to, climate change?
- 1.11. Does the Plan comply with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations?
- 1.12. Does the Policies Map [SD03 and SD04] correctly illustrate geographically the application of policies of the Plan?
- 1.13. Is the Plan period (2022-2039) justified, effective and consistent with national policy which requires strategic policies to look at least 15 years ahead from adoption?
- 1.14. How have made and emerging Neighbourhood Plans been taken into account and where is this evident?
- 1.15. Are there any other relevant legal and procedural requirements that the Plan should address?

Matter 2 - Vision, Objectives and Purpose of the Plan

Issue 2: Are the Local Plan Vision and Plan Objectives (PO1-PO10) positively prepared, justified, effective and consistent with national policy?

- 2.1. Are the Local Plan Vision and Plan Objectives justified by the evidence and do they reflect the issues and challenges facing the Borough? Do the objectives flow from the vision and are they internally consistent, for example relating to terminology used.
- 2.2. Are the Local Plan Vision and Plan Objectives positively prepared when considered against the vision, strategic objectives, spatial strategy and policies of PFE [PW09]?
- 2.3. Is it clear how the Plan policies will help to deliver the vision and objectives over the Plan period? Does the Plan provide a clear spatial strategy?
- 2.4. Does the Plan set out a clear settlement hierarchy to guide the distribution of development in the borough, and is it positively prepared as a result?
- 2.5. With regard to the Key Diagram, does this provide an effective visual representation of the Spatial Strategy set out in the Plan, consistent with paragraph 23 of the 2021 Framework?
- 2.6. Are the Vision and Plan Objectives in Chapters 6 and 7 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?
- 2.7. The Plan does not allocate any sites for development. We will consider the supply of housing and employment under Matters 3 and 4. Notwithstanding this, and irrespective of our findings on these matters:
 - a) Is there evidence that the approach is informed by the IA [SD05 to SD08] and has been considered against reasonable alternatives?
 - b) Is this approach consistent with the Local Development Scheme [PW011]?
 - c) Is it consistent with PFE [PW09]?
 - d) Would it be a sound approach when considered against the 2021 Framework?
 - e) Does the approach adequately address the cumulative impacts of development?
 - f) Would a Part 2 Plan that is solely a "Development Management Policies Document" provide an effective means of implementing the vision and objectives contained in chapters 6 and 7? Which parts of the Plan set out requirements which are not already contained within PFE or the Framework?

Matter 3 - Housing policies (including housing land supply)

Issue 3: Is the identified housing requirement in Policy H1 positively prepared, justified, effective and consistent with national policy?

- 3.1. Is the housing requirement of 11,560 homes over the Plan period justified and consistent with national policy set out in paragraph 66 of the 2021 Framework? Is this figure consistent with PFE [PW09]?
- 3.2. Should there be a housing requirement for designated neighbourhood areas identified within the Plan (paragraph 66 in the Framework 2021)? If so, what should this be?
- 3.3. Is Policy H1 sufficiently flexible to ensure that new housing development can come forward at the rate envisaged, and therefore is it effective? Is the requirement to achieve Greater Manchester Accessibility Level (GMAL) 4 or above reasonable and soundly based?
- 3.4. Does Policy H1 provide sufficient information to assist the decision maker? Is Policy H1 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

Issue 4: Does the Plan provide an appropriate supply of deliverable and developable sites to meet identified needs and align with national policy?

- 3.5. Does the Plan identify a supply of specific, deliverable sites for years one to five of the plan period, including consideration of the relevant buffer as required by paragraph 74 of the 2021 Framework? Has sufficient regard been had to lead in times and build out rates, and is the Plan positively prepared and effective as a result?
- 3.6. Does the Plan identify a supply of specific, developable sites for year six of the Plan onwards?
- 3.7. Is there compelling evidence to support the reliance on unpermitted windfall sites as part of the projected housing land supply, in line with paragraph 71 of the 2021 Framework? In particular:
 - a) Is this supported by compelling evidence of past trends?
 - b) Is there compelling evidence that this will be reflected in future trends?
 - c) Where the Council seeks to rely on specific windfall sites as identified in Appendix 1 of the Housing Topic Paper (including subsequent amendments), is there robust evidence to set out how capacity assumptions for these sites have been determined?
 - d) Does the Plan include adequate evidence to demonstrate the expected rate of housing delivery over the plan period, and the anticipated rate of development for specific sites, in order to be consistent with paragraph 74 of the 2021 Framework?
- 3.8. Does the Plan prioritise previously-developed or 'brownfield' land in accordance with paragraph 119 of the 2021 Framework?

- 3.9. How has any over or undersupply of housing completions since from 2022-2026 affected the level of housing that needs to be planned for across the remaining Plan period?
- 3.10. Has appropriate consideration been given to non-implementation lapse rates?
- 3.11. Does the Plan promote the development of small and medium sized sites? Is land identified to accommodate at least 10% of the housing requirement on sites no larger than one hectare, in accordance with paragraph 69(a) of the 2021 Framework?

Issue 5: Does the Plan set out positively prepared housing policies (Policies H2 to H7) which are justified, effective and consistent with national policy?

Policy H2

- 3.12. Is Policy H2 justified and consistent with national policy and PFE [PW09] policy JP-H4? Have the Council considered any alternative approaches to density?
- 3.13. Are the exceptions to minimum densities identified in the policy justified? In particular, is the exception that relates to 'particular housing need' sufficiently precise in terms of the type of housing being referred to? Would the policy be effective?

Policy H3

- 3.14. Is the recommended housing mix set out in Table H3 justified and consistent with national policy?
- 3.15. Does Policy H3 provide effective direction for the decision maker in relation to housing mix, particularly with regard to:
 - a) the role of the LHNA and table H3?
 - b) the circumstances in which an alternative housing mix will be appropriate?
 - c) the circumstances where level access homes and bungalows will be sought?
- 3.16. Is Policy H3 positively prepared, justified and consistent with national policy with regard to self-build and custom housebuilding? In particular:
 - a) Is there an evidenced assessment of need? How does the policy address this?
 - b) Does the policy provide adequate direction for a decision-maker and would it provide an effective framework to ensure the delivery of an adequate supply of custom and self-build plots over the plan period?

Policy H4

- 3.17. Does Policy H4 provide an effective framework that would ensure the needs for different groups identified in paragraph 62 of the 2021 Framework will be met over the plan period? Does the evidence provide a robust up-to-date assessment of these different needs? In particular, is the reliance on 2018 Household Survey data (re-weighted using the 2021 Census) in the Local Housing Needs Assessment (December 2024) [HO05] justified?

- 3.18. Does Policy H4 suitably define the different types of specialist housing covered by the policy, and is it therefore effective?
- 3.19. Does the policy provide an effective basis for ensuring that specialist housing provision is located and designed to address the specific need in question?
- 3.20. Given the need for older persons housing outlined in the LHNA, is the policy focus on adaptations and a criteria-based approach an effective basis to meet this need?
- 3.21. Are the policy requirements relating to housing for children and care leavers justified and effective?
- 3.22. Is the requirement for all specialist housing provision of 10 homes and above to provide affordable housing justified, effective and consistent with national policy set out in paragraph 65 of the 2021 Framework?

Policy H5

- 3.23. Does the evidence provide a robust assessment of affordable housing in terms of overall need and tenure, consistent with paragraph 62 of the 2021 Framework? How many affordable homes does the Council anticipate will be delivered over the Plan period?
- 3.24. Is there convincing evidence to show that affordable housing requirements, including on specialist housing, would be viable? How were the thresholds for affordable housing and areas in which they apply arrived at? Are they based on comprehensive and up to date information?
- 3.25. Does Policy H4 provide an effective framework that would ensure the need for affordable housing will be met over the plan period? In particular:
 - a) Is 'affordable housing' suitably defined?
 - b) Does the reference to First Homes in the policy supporting text remain appropriate?
 - c) Is the requirement for affordable housing to be 'pepper potted' throughout sites justified for all affordable tenures?
 - d) Is the policy sufficiently clear whether site capacity is calculated on a gross or net basis?
 - e) Where exceptions to the general tenure mix apply, are there any specific tenure requirements that would be applicable to the different types of housing identified?
 - f) With regard to the exception relating to funding requirements, what level of evidence would be required to demonstrate this?
 - g) Is the reference to an updated LHNA justified?
 - h) Is the policy clear on the circumstances in which the exception for off-site provision or a commuted sum would apply? Is it clear how a commuted sum would be calculated where this exception applies?
 - i) Are the exceptional circumstances which allow lower provision of affordable housing justified? Are there any other relevant circumstances that should be identified?

- 3.26. Does the policy ensure that at least 10% of the number of homes provided as part of major development would be for affordable home ownership, in accordance with paragraph 65 of the 2021 Framework?

Policy H6

- 3.27. Is Policy H6 positively prepared, effective, justified and consistent with national policy? In particular:
- a) Is the restriction of 10% or more HMOs within a 50-metre radius, and the restriction on HMOs being located adjacent to another HMO, supported by appropriate evidence?
 - b) Is it appropriate to apply the same approach to C4 and Sui Generis HMOs?
 - c) Is the reference to meeting the Council's HMO licensing requirements justified?
 - d) Is the requirement for a statement of community engagement and impact assessment justified for all HMOs? Is it clear and understandable for decision makers and applicants what this assessment should entail?

Policy H7

- 3.28. Do the Greater Manchester Gypsy and Traveller Accommodation Assessment 2024 and the Greater Manchester Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2018 provide a robust evidence base with regard to the identification of needs for pitches and plots?
- 3.29. Is Policy H7 positively prepared and does it provide an effective framework to ensure the need for accommodation for Gypsy and Travellers and Travelling Showpeople can be met as required by national policy?
- 3.30. Is there evidence of effective cooperation with other Greater Manchester authorities, particularly in relation to the provision of Travelling Showpeople sites; the provision of transit pitches and addressing other authorities unmet need for Gypsy and Traveller sites?
- 3.31. Are the criteria for assessing Gypsies, Travellers and Travelling Showpeople sites justified, clear and would they be effective?

Overall

- 3.32. Are policies H2 to H7 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?
- 3.33. Are any Main Modifications required to ensure the policies are sound?

Matter 4 - Employment and retail policies

Issue 6: Are the policies of the plan in relation to the provision of employment land (Policy E1) justified, effective and consistent with national policy?

- 4.1. Are the employment floorspace requirements of at least 57,481sqm of office (E(g)(i)) floorspace and at least 240,656sqm of industrial and warehousing (B2 and B8) for the Plan period justified and are the assumptions and methodology from which it was arrived at soundly based?
- 4.2. Is the Plan consistent with PFE [PW09]?
- 4.3. Can the Council demonstrate evidence of effective cooperation with regard to Policy E1, which demonstrates that any unmet needs for employment space are addressed?
- 4.4. What is the identified supply of office and industry and warehousing in the Plan and which sites is it derived from? Are the findings of the Employment Land Review (January 2024) [EE03] in relation to existing supply reasonable? Does it include an adequate qualitative assessment of the existing supply and are its conclusions in relation to existing supply soundly based?
- 4.5. Does the Plan prioritise previously-developed or 'brownfield' land in accordance with paragraph 119 of the 2021 Framework?

Issue 7: Are the proposed employment policies (Policies E2 to E5) justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?

Policy E2

- 4.6. Is Policy E2 positively prepared and does it provide an effective framework to ensure that employment floorspace will be delivered with the Business and Employment Areas (BEAs)? Is the policy supported by appropriate qualitative evidence to demonstrate that the conditions in BEAs are conducive to further growth, and therefore is it justified?
- 4.7. Is the list of uses that will be permitted within BEAs justified and consistent with national policy?
- 4.8. Is the intention to withdraw permitted change of use rights for other Class E uses justified?
- 4.9. Paragraph 9.20 states that it may be appropriate to locate some small scale and complementary uses to the employment function within the BEAs. Is this justified? Should this provision be contained within Policy E2 to be effective?

Policy E3

- 4.10. Does Policy E3 provide an effective basis for protecting employment land within BEAs?
- 4.11. Is Policy E3 sufficiently flexible to account for changing circumstances? In particular:

- a) Is the requirement for at least 12 months marketing for uses other than those set out in Policy E2 justified?
- b) Is the requirement for a masterplan/framework justified and effective?
- c) Is the sequential approach in criterion 3 justified and effective?
- d) Is the list in criterion 4 intended to be a closed list? Are there any other considerations that could apply? With regard to neighbour amenity issues, would this include consideration of 'agent-of-change' where amenity issues have arisen by virtue of other uses being located next to a pre-existing BEA?

Policy E4

4.12. Is Policy E4 effective and justified? In particular:

- a) Is the term 'employment generating uses' suitably defined?
- b) Is the policy sufficiently clear for decision makers and applicants in terms of how an employment site would be demonstrated to be unsuitable? Similarly, is the policy clear what is meant by 'favourable consideration'?
- c) Is the requirement for at least 12 months marketing justified? Is the policy sufficiently clear what a marketing exercise should entail, and therefore is it effective?

Policy E5²

4.13. Is Policy E5 effective and justified? In particular:

- a) Would the policy operate effectively in conjunction with Policies E2, E3 and E4?
- b) Is the policy sufficiently clear on the circumstances where the loss of existing employment uses will be justified?
- c) Is the policy sufficiently clear for decision makers and applicants in terms of how an application would demonstrate that the primary function of the BEA or locality, or the operations of neighbouring users, would not be significantly compromised?
- d) Is the term 'non-employment generating uses' suitably defined?

Overall

4.14. Are the policies in Chapter 9 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

4.15. Are any Main Modifications required to ensure the policies are sound?

Issue 8: Are the proposed town centre and retail policies (Policies C1 to C4) justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?

Policy C1

4.16. Is Policy C1 justified, effective and consistent with national policy? Does the evidence provide a robust up-to-date assessment of retail and leisure need?

² Questions under this heading are related to employment only. Heritage related questions are set out under Matter 9.

Does the Plan provide an effective basis for meeting identified retail and leisure needs, consistent with paragraph 86 of the 2021 Framework?

- 4.17. Is the hierarchy identified in Policy C1 justified and consistent with national policy? Is it consistent with PFE [PW09]?
- 4.18. Does the Plan define the extent of town centres and primary shopping areas, consistent with paragraph 86(b) of the 2021 Framework?

Policy C2

- 4.19. Is Policy C2 effective, justified and consistent with national policy? In particular:
- a) Is the term 'centre uses' sufficiently clear in relation to the terminology and definitions set out in the 2021 Framework?
 - b) Would Policy C2 operate effectively in conjunction with other employment policies with regard to specific main town centre uses such as offices?
 - c) Is the sequential test consistent with paragraphs 87 to 89 of the 2021 Framework? Is the policy sufficiently clear for decision makers and applicants in terms of the evidence required to satisfy the sequential test?
 - d) Is the impact assessment consistent with paragraph 90 of the 2021 Framework? Are the thresholds justified by up-to-date and convincing evidence? Is the policy sufficiently clear for decision makers and applicants in terms of how the thresholds would apply?

Policy C3

- 4.20. Is Policy C3 effective, justified and consistent with national policy? In particular:
- a) Does the policy provide an effective framework for assessing applications involving changes between different main town centre uses?
 - b) Are the requirements for non-main town centre use proposals justified and effective? How would a harmful concentration of uses be determined in the context of paragraph 3(c) of the policy?
 - c) Are the requirements for ground floor residential uses justified and effective? Is the policy reasonable and sufficiently clear for decision makers and applicants in terms of how no realistic prospect of securing an active retail or commercial use would be demonstrated?

Policy C4

- 4.21. Is Policy C4 effective, justified and consistent with national policy? In particular:
- a) Is the term 'existing built-up areas' suitably defined?
 - b) Is the 300sqm threshold for new Use Class E shops and services justified and effective? Does this threshold apply to local shopping parades?

Overall

- 4.22. Are the policies in Chapter 10 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?
- 4.23. Are any Main Modifications required to ensure the policies are sound?

Matter 5 - Oldham Town Centre policies

Issue 9: Does the Plan set out a positively prepared strategy and policies for Oldham Town Centre (Policies OTC1 to OTC4) which is justified, effective and consistent with national policy?

Policy OTC1

- 5.1. Is Policy OTC1 justified and consistent with national policy? What is the status and role of the Oldham Town Centre Development Framework document? Is this document intended to be relied on to assess development proposals coming forward in the town centre?
- 5.2. Do the principles set out in the policy provide an effective framework to ensure the delivery of development in Oldham Town Centre?
- 5.3. Are the assumptions regarding the amount and timing of future development anticipated within Oldham Town Centre soundly based?

Policies OTC2 to OTC4

- 5.4. Are the policies effective, justified and consistent with national policy?

Overall

- 5.5. Are the policies in Chapter 11 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?
- 5.6. Are any Main Modifications required to ensure the policies are sound?

Matter 6 - Infrastructure and delivery policies

Issue 10: Does the Plan set out a positively prepared strategy and policies for infrastructure (Policies CO3 to CO6; IN1 to IN3) which is justified, effective and consistent with national policy?

Policies CO3, CO4, CO5, CO6 and IN1

- 6.1. Does the Plan provide an effective framework to ensure the delivery of the necessary infrastructure?
- 6.2. Are the Plan requirements relating to infrastructure supported by up-to-date evidence? How will the requirements of the policies be kept up to date?
- 6.3. Have the viability implications of Policies CO3, CO4, CO5, CO6 and IN1 been appropriately tested? Are the assumptions in the Local Plan Viability Assessment (December 2025) [PW05] reasonable and up to date?
- 6.4. Does the Plan adequately reflect the scale and cost of infrastructure requirements for development in the Borough as set out in the Infrastructure Delivery Plan (January 2026) [ID03]?
- 6.5. Are the policies sufficiently flexible? Do they take appropriate account of development in cases where viability is below that which would be policy compliant?
- 6.6. Is Policy CO3 effective, justified and consistent with national policy? In particular:
 - a) Is 'community facilities' adequately defined and is the policy effective as a result?
 - b) Is the policy sufficiently clear how demand for individual facilities can be established?
- 6.7. Is Policy CO4 effective, justified and consistent with national policy?
- 6.8. Is Policy CO5 positively prepared, effective, justified and consistent with national policy? In particular:
 - a) What is the evidence of unmet need? Does the Plan positively address any unmet need?
 - b) Is the 10 dwelling threshold justified? Are the circumstances where a development would create or exacerbate a shortfall in local school places sufficiently clear and understandable for decision makers and applicants?
 - c) Is the financial contribution formula effective? Is the evidence identified to inform pupil yield factor and cost per pupil place up to date?
- 6.9. Is Policy CO6 effective, justified and consistent with national policy? In particular:
 - a) What is the evidence of unmet need? Does the Plan positively address any unmet need?
 - b) Is the policy sufficiently flexible with regards to justifying the loss of a healthcare facility?

- c) Is the policy sufficiently clear regarding the circumstances where submission of a Health Impact Assessment would be required?
- d) Is the 10 dwelling threshold justified? Are the circumstances where a development would create or exacerbate a shortfall in health provision sufficiently clear and understandable for decision makers and applicants?

6.10. Is Policy IN1 effective, justified and consistent with national policy?

Policy IN2

6.11. Is Policy IN2 effective, justified and consistent with national policy?

6.12. Is the policy clear on the circumstances when a site-specific viability assessment can be submitted?

6.13. With regard to maximising the value of planning obligations in the event that it is not financially viable to provide the level of planning obligations proposed, is the policy sufficiently clear on what obligations would be prioritised?

6.14. Is the requirement for a clawback mechanism justified? Is the policy sufficiently clear on the intended operation of any clawback mechanism?

Policy IN3

6.15. Is Policy IN3 justified and consistent with national policy?

6.16. Are the requirements of Policy IN3 sufficiently clear and understandable for decision makers and applicants and is the policy effective as a result?

6.17. Does the inability to prepare an SPD to provide further guidance on delivering social value impact the effectiveness of Policy IN3?

Overall

6.18. Are the policies in Chapters 18 and 20 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

6.19. Are any Main Modifications required to ensure the policies are sound?

Matter 7 - Transport policies

Issue 11: Does the Plan set out a positively prepared strategy and policies (Policies T1 to T5) for transport which is justified, effective and consistent with national policy?

Policy T1

- 7.1. Is Policy T1 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?
- 7.2. Is Policy T1 positively prepared with regard to impacts on the Strategic Road Network (SRN)? Is it supported by evidence relating to the individual and cumulative impacts of development on the SRN? What consideration has been given to potential mitigation of impacts?
- 7.3. Can the Council demonstrate evidence of effective cooperation with National Highways with regard to Policy T1?

Policy T2

- 7.4. Is Policy T2 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?

Policy T3

- 7.5. Is Policy T3 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?
- 7.6. Does the absence of maximum car parking standards undermine the effectiveness of policies in the Plan that seek to make efficient use of land?
- 7.7. Is the requirement for pedestrian only safe routes through and around parking areas justified? Is this requirement necessary in conjunction with part g of the policy?
- 7.8. Is the requirement to provide appropriate mitigation in relation to off-site car parking impacts justified and effective? Is it appropriate for this requirement to apply to all development?

Policy T4

- 7.9. Is Policy T4 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]? Is there adequate evidence to justify going beyond relevant Building Regulations requirements in this case?
- 7.10. Have the viability implications of Policy T4 been appropriately tested? Are the policies sufficiently flexible?

Policy T5

- 7.11. Is Policy T5 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?
- 7.12. Does the policy clearly distinguish the role and purpose of each document, and does it set out clear triggers where the different documents would be required?

Overall

- 7.13. Are the policies in Chapter 17 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?
- 7.14. Are any Main Modifications required to ensure the policies are sound?

Matter 8 - Biodiversity and Natural Environment policies

Issue 12: Does the Plan set out a positively prepared strategy and policies (Policies OL1 to OL5; N1 to N4; CO1 to CO2) for biodiversity and the natural environment which is justified, effective and consistent with national policy?

Policy OL1

8.1. Is Policy OL1 effective, justified and consistent with national policy?

Policy OL2

8.2. Is there sufficient evidence to demonstrate that there are exceptional circumstances that justify the amendments to Green Belt boundaries (as set out in Appendix 8), in accordance with national policy?

8.3. Is Policy OL2 justified and consistent with national policy?

8.4. Is Policy OL2 effective? In particular:

- a) Is the extent of villages sufficiently clear?
- b) Is the definition of infilling sufficiently clear? Is the reference to the development of gaps in the last paragraph of the policy justified in relation to the relevant Green Belt exceptions?

Policy OL3

8.5. Is Policy OL3 justified, effective and consistent with national policy?

Policy OL4

8.6. Is Policy OL4 effective, justified and consistent with national policy? In particular:

- a) Have the Local Green Spaces identified been selected based on appropriate and up to date evidence? Are the exceptions identified in the policy effective and consistent with the 2021 Framework?
- b) Is the reference to small scale proposals in criterion 1 suitably precise and is it therefore effective?
- c) Is the 'presumption against development proposals that will substantially harm the significance of the Local Green Space' consistent with national policy?

Policy OL5

8.7. Is Policy OL5 effective, justified and consistent with national policy?

Policy N1

8.8. Is Policy N1 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?

8.9. Does Policy N1 provide a suitable framework to prevent adverse effects on designated habitats sites in accordance with the Conservation of Habitats and Species Regulations 2017?

8.10. Is the policy hierarchy justified? In particular:

- a) Are the reasons for including sites as locally designated sites (Sites of Biological Importance, Regionally Important Geological Sites, Local Nature Reserves) justified? Is the geographic extent of these sites clear and is the policy therefore effective?
- b) Is it appropriate to include non-designated sites within the hierarchy? What is the likely extent of non-designated sites that would fall under criterion 5? Will identification of these sites be sufficiently clear and understandable for decision makers and applicants on a case-by-case basis?

Policy N2

8.11. Is Policy N2 effective, justified and consistent with national policy?

8.12. Are the requirements of Policy N2 sufficiently clear and understandable for decision makers and applicants with regard to the requirement to achieve a net increase in biodiversity, and is the policy effective as a result?

8.13. Are the policy principles in relation to the selection of Biodiversity Net Gain off-site areas justified and consistent with national policy? Is the policy approach consistent with the statutory Biodiversity Net Gain process?

8.14. Have the viability implications of Policy N2 been appropriately tested? Are the policies sufficiently flexible?

Policy N3

8.15. Is Policy N3 effective, justified and consistent with national policy? In particular, are the different thresholds in the policy supported by evidence?

8.16. Is the requirement for major development to achieve specific Urban Greening Factor scores justified by evidence? Is the requirement clear and understandable for decision makers and applicants with regard to establishing their score on a case-by-case basis, and is the policy effective as a result?

8.17. Have the viability implications of Policy N3 been appropriately tested? Are the policies sufficiently flexible?

Policy N4

8.18. Is Policy N4 effective, justified and consistent with national policy? Is it supported by convincing evidence?

8.19. Have the viability implications of Policy N4 been appropriately tested? Are the policies sufficiently flexible?

Policy CO1

- 8.20. Is Policy CO1 effective, justified and consistent with national policy? Has the identification of open space been based on appropriate and up to date evidence?
- 8.21. Is the policy clear and understandable for decision makers and applicants, particularly with regard to the extent of open space covered and the evidence required to justify the loss of open space (for example, identifying if open space is surplus to local needs or whether it is required to meet deficiencies in other open space typologies)?
- 8.22. Is the policy justified in applying the same level of protection to all types of open space? Is the policy sufficiently flexible with regards to justifying the loss of open space?
- 8.23. Can the Council demonstrate evidence of effective cooperation with Sport England with regard to Policy CO1? Would the policy ensure adequate provision for outdoor sport?

Policy CO2

- 8.24. Is Policy CO2 justified and consistent with national policy? Is it supported by convincing evidence?
- 8.25. Are the requirements of Policy CO2 sufficiently clear and understandable for decision makers and applicants, and is the policy effective as a result? In particular:
 - a) Is the policy clear on the circumstances when delivery of off-site open space would be sought?
 - b) Is the policy clear how off-site financial contributions would be calculated?
 - c) Is the requirement for on-site open space to be well connected to the existing green infrastructure network justified given that the location of future on-site spaces is unknown?
 - d) Are the open space standards justified by evidence? Is it clear how these standards would apply to individual applications?
 - e) Is the value standard justified by evidence? Is it clear how the value standard would apply to individual applications, including in conjunction with the other open space standards identified in the policy?
- 8.26. Have the viability implications of Policy CO2 been appropriately tested? Are the policies sufficiently flexible?

Overall

- 8.27. Are the policies in Chapters 13, 14 and 18 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?
- 8.28. Are any Main Modifications required to ensure the policies are sound?

Matter 9 - Design and Historic Environment policies

Issue 13: Does the Plan set out a positively prepared strategy and policies (Policies HE1 to HE5; D1 to D4) for design and the historic environment which is justified, effective and consistent with national policy?

Policy D1

- 9.1. Are the requirements of Policy D1 sufficiently clear and understandable for decision makers and applicants and is the policy effective as a result? Does the inability to prepare an SPD to provide further guidance impact the effectiveness of Policy? Consequently, should key design requirements be set out more explicitly in policy rather than through reference to local design guides and design codes?
- 9.2. Is the policy sufficiently clear with regard to the operation of the local design review process, and what would constitute a 'significant design issue'? Is the policy effective as a result?
- 9.3. Are the design requirements for strategic developments justified and effective? Is it sufficiently clear what constitutes 'strategic development'?

Policy D2

- 9.4. Is Policy D2 positively prepared, justified and effective?

Policy D3

- 9.5. Is Policy D3 justified and effective? Is the policy consistent with paragraph 97 of the 2021 Framework with regard to ensuring public safety and security?

Policy D4

- 9.6. Is the policy sufficiently clear with regards to how it interacts with Policies D1, OL2, OL3 and OL4, in particular whether it is intended to apply in addition to these policies? Is the policy justified and effective as a result?

Policy HE1

- 9.7. Is Policy HE1 justified and effective?
- 9.8. Is the term 'restoration' suitably defined within Policy HE1 and is the policy effective as a result?

Policy HE2

- 9.9. Is Policy HE2 consistent with national policy, particularly with regard to the reference to 'sustain and enhance'?
- 9.10. Are the requirements of Policy HE2 sufficiently clear and understandable for decision makers and applicants and is the policy effective as a result?

Policy HE3

- 9.11. Is Policy HE3 consistent with national policy?

- 9.12. What is the extent of conservation area appraisal coverage across the Borough's 36 conservation areas? Do any gaps and/or older appraisals undermine the effectiveness of the policy?
- 9.13. Are the requirements of Policy HE3 sufficiently clear and understandable for decision makers and applicants, both in isolation and in conjunction with Policies HE1 and HE2, and is the policy effective as a result?

Policy HE4

- 9.14. Are the requirements of Policy HE4 sufficiently clear and understandable for decision makers and applicants and is the policy effective as a result? In particular:
- a) Are there any mills that are designated heritage assets (e.g. they are listed or fall within a conservation area)? If so, how would Policy HE4 operate in conjunction with Policies HE1 to HE3?
 - b) Is the policy sufficiently clear in relation to non-designated heritage assets and the different mill priority levels?
 - c) Is the policy sufficiently clear in relation to mill clusters? Is it clear what the status of these clusters is compared to the priority categories and would the policy provide an effective basis to assess planning applications within the clusters?
- 9.15. What is the status of the Oldham Mills Strategy? Is it justified to rely on this strategy to assess future development proposals?
- 9.16. Are the mills that would be subject to the policy clearly set out on the Policies Map, to allow for Policy HE4 to be implemented effectively?

Policy HE5

- 9.17. Is Policy HE5 justified and effective?
- 9.18. Is the terminology in the policy consistent with national policy?
- 9.19. Are the requirements of Policy HE5 sufficiently clear and understandable for decision makers and applicants, both in isolation and in conjunction with Policies HE1, HE2 and HE3, and is the policy effective as a result?
- 9.20. Is the term 'restoration' suitably defined within Policy HE5 and is the policy effective as a result?

Overall

- 9.21. Are the policies in Chapters 15 and 16 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?
- 9.22. Are any Main Modifications required to ensure the policies are sound?

Matter 10 - Climate Change policies

Issue 14: Does the Plan set out a positively prepared strategy and policies (Policies CC1 to CC5) for climate change which is justified, effective and consistent with national policy?

Policy CC1

- 10.1. Is Policy CC1 justified and consistent with national policy?
- 10.2. Are the requirements of Policy CC1 sufficiently clear and understandable for decision makers and applicants, particularly with regard to how it applies to developments of different types and scale, and is the policy effective as a result?

Policy CC2

- 10.3. Is Policy CC2 justified and consistent with national policy?
- 10.4. Are the requirements of Policy CC2 sufficiently clear and understandable for decision makers and applicants, and is the policy effective as a result?

Policy CC3

- 10.5. Is Policy CC3 justified and consistent with national policy?
- 10.6. Are the requirements of Policy CC3 sufficiently clear and understandable for decision makers and applicants, and is the policy effective as a result?

Policy CC4

- 10.7. Is the requirement for all new residential developments to achieve the Building Regulations optional requirement for water efficiency justified and consistent with national policy?
- 10.8. Is the BREEAM requirement for major non-residential development justified and consistent with national policy?

Policy CC5

- 10.9. Is Policy CC5 justified and consistent with national policy?
- 10.10. Are the requirements of Policy CC5 sufficiently clear and understandable for decision makers and applicants, and is the policy effective as a result?
- 10.11. Are the Groundwater Source Protection Zones clearly set out on the Policies Map, to allow for Policy CC5 to be implemented effectively?

Overall

- 10.12. Are the policies in Chapter 12 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?
- 10.13. Are any Main Modifications required to ensure the policies are sound?

Matter 11 - Communities and Local Environment policies

Issue 15: Does the Plan set out a positively prepared strategy and policies (Policies CO7; LE1 to LE3) for communities and the local environment which is justified, effective and consistent with national policy?

Policy CO7

10.14. Is Policy CO7 justified, effective and consistent with national policy? In particular:

- a) How would an 'unacceptable concentration' of hot food takeaways and fast-food outlets be determined in the context of Oldham Town Centre?
- b) Is the policy justified in taking a more permissive approach in Oldham Town Centre compared to the rest of the borough with regard to proximity to schools and places where children and young people congregate?
- c) Is the 400m walking distance justified? Is it justified to apply the same approach to primary and secondary schools? Is the policy clear how walking distance will be measured and therefore is it effective?
- d) Is the policy approach to "places where children and young people congregate" justified?
- e) Is the requirement to contain litter within the curtilage of the premises justified?
- f) Is the requirement to promote healthier food and drink options justified and effective?
- g) Is the requirement for a HIA for hot food takeaways and fast-food outlets justified?

Policies LE1, LE2 and LE3

10.15. Are Policies LE1, LE2 and LE3 justified and consistent with national policy?

10.16. Are the requirements of the policies sufficiently clear and understandable for decision makers and applicants, and is the policy effective as a result?

Overall

10.17. Are the policies in Chapters 18 and 19 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

10.18. Are any Main Modifications required to ensure the policies are sound?

Matter 12 - Monitoring

Issue 16: Does the Plan set out a positively prepared strategy for monitoring which is justified, effective and consistent with national policy?

- 10.19. Is the plan sufficiently clear as to how its implementation will be monitored?
Would the indicators selected provide an effective mechanism for monitoring the performance of the Plan?
- 10.20. Is Policy M1 necessary for monitoring purposes, and therefore is it justified and effective?