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Chris Martin – Homes Builders Federation (HBF)
Oldham Local Plan Examination
Matters, Issues and Questions – Matter 2

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?

Q2.1 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.

Q2.2. Are the Local Plan Vision and Plan Objectives positively prepared when considered against the vision, strategic objectives, spatial strategy and policies of PFE [PW09]?

Q2.3. 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?

1. Whilst the HBF considers that the objectives are linked to the requirements outlined within the Local Plan (albeit specific policy references are not provided), it is unclear how this has then been translated into a spatial strategy to deliver the vision and objectives.

2. The PfE does provide an overarching spatial strategy for Oldham, but this is on a scale relating to the borough's role in the wider Greater Manchester area. The Local Plan should then translate this to a more local level that can take into account the specific needs and circumstances of Oldham.

3. It is noted that a Key Diagram is included in the Local Plan but this in itself lacks detail and a sufficient accompanying explanation.

Q2.4. 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?

4. The Local Plan does not appear to include a settlement hierarchy to go alongside the spatial strategy. It is considered that this is for the Council to explain and justify.

Q2.5. 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?

Q2.6. Are the Vision and Plan Objectives in Chapters 6 and 7 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

5. Notwithstanding our comments relating to Policy H1, the HBF generally considers the vision and objectives are broadly effective in promoting housing growth in the borough, albeit as outlined in our Regulation 19 representations, there is a lack of a spatial link between the provision of new homes and focussing them on where they are needed in the borough.

Q2.7. 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?

6. The HBF does not consider this to be a sound approach given that the evidence base to the plan highlights a specific housing need that needs to be fulfilled over the plan period. Without allocating land, it cannot be said that the Local Plan is positively prepared to meet that need or that the Local Plan is effective in demonstrating that it can realistically deliver homes to meet that need.

7. Related to the earlier questions under this matter, the lack of allocations also means that the Local Plan does not have a robust spatial strategy or settlement hierarchy to direct development over the plan period, which again leads to an ineffective plan.

8. Without allocating sites the Council also cannot demonstrate clearly how it will provide land to accommodate at least 10% of their housing requirement on sites no larger than one hectare and how it will robustly demonstrate a five year supply of deliverable housing land over the plan period. This is explored further under Matter 3.

(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?

9. Given that the PfE only sets requirements and need at a high strategic level, the HBF considers that a “Development Management Policies Document” would be insufficient to provide a robust development plan for Oldham, as there is still clearly a need to set strategic policies that relate specifically to the borough and provide a locally specific spatial strategy that can sit aside that prepared for the PfE.