

`Planning for Growth`

Statement prepared by Oldham Council at the request of the Planning Inspector on the Government's Budget Statements

26 April 2011



Oldham
Council

Background

- 1.1 This is the council's response to the Inspector's invitation for comments on the Government's Planning for Growth Statements.
- 1.2 Oldham has ambitious plans for future development, regeneration and investment in the borough. The council is working with public and private sector partners on taking forward major economic, education, housing, health, environmental plans. Together these will transform Oldham for the better; improving the quality of life for local people and our communities by making Oldham an `address of choice` alongside a high-quality jobs offer. These plans are reflected in the LDF which is a key delivery mechanism.
- 1.3 Key to the borough's future direction is recognising that economic performance and housing are intertwined, whilst at the same time ensuring appropriate and necessary environmental protections. We want to make the borough an address of choice. This will be through securing housing-led regeneration, reuse of brownfield sites and appropriate housing mix. Alongside improving our housing offer, we want to change our local economy with a shift towards low carbon industries and technologies. Improving prosperity will help address worklessness, tackle deprivation and promote well-being.
- 1.4 Oldham is part of Greater Manchester's north-east housing market area. Working with partners and developers we will ensure the borough's housing market is balanced and sustainable to meet the needs of our communities, by providing quality, choice and diversity through residential development, promoting the effective and efficient use of land and managing the release of housing land. The focus for housing will be sustainable and accessible locations, including regeneration areas (Oldham Town Centre and former HMR areas), areas within and accessible to the borough's other centres (of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill), and rural settlements (such as the Saddleworth villages). This approach fits in with helping to promote regeneration and protect our open countryside, including Green Belt and Other Protected Open Land.
- 1.5 Our approach towards employment land is to `keep the best and recycle the rest`. The LDF identifies an `arc of opportunity` of key development locations for business that underpins our future economic prosperity. This area (shown on the Key Diagram¹) stretches from Oldham Town Centre through to the Chadderton Technology Park, Foxdenton and Broadway in Chadderton and on to Hollinwood. It forms a logical `extension` to the Manchester City Centre corridor, and links with the ORESA² M60 employment zone. The LDF encourages and supports sustainable, low carbon economic regeneration, diversification, growth and prosperity. Making it easier for people to get to jobs, here in the borough or in Manchester City Centre and our neighbouring districts key sites, is also a challenge. Metrolink will be a key element in improving public transport accessibility.
- 1.6 `Plan for Growth` recognises the role of skills in future economic success. We have ambitious plans for improving skills. Towards a University Town (TAUT)³ is a commitment to the people of Oldham to help them fulfil their potential and create well-qualified young

¹ CD 001, page 40

² CD 327

³ CD 406

people and adults at every education level. Through investing in education Oldham Council can encourage regeneration in Oldham from primary school through to adult education and training. The concept focuses on diversifying the local economy and increasing the emphasis on high value economic activities which compete on the basis of a quality skills and knowledge base. It will transform Oldham from a traditional low-skilled, manufacturing borough towards a centre for learning and educational excellence which competes on a knowledge and skills basis rather than for low cost, low wage activity. The Regional Science Centre Oldham (RSCO) is designed to inspire everyone with science in their DNA – from primary school children to A level students and on to industry. Working with schools, further education providers and universities, RSCO is developing science skills in and around Oldham. RSCO opens this year. The Green Technology Centre launches in September and will provide the skills required across all ages to help move Oldham towards a low carbon economy. University Campus Oldham, part of University of Huddersfield, provides successful higher education provision. Oldham's three new academies will be delivered as part of Building Schools for the Future and will tackle the problem of underperforming schools and create new education and integration opportunities for young people, ultimately driving an improvement in educational attainment.

- 1.7** The LDF recognises that our local natural, built and historic environments play a crucial part in so many aspects of life in the borough, for example liveability, health, people's perceptions of safety, community cohesion and image. We need to protect people's amenity and improve local environmental quality. Achieving sustainable development through using our resources wisely, securing the right locations and ensuring the high-quality design and construction of new buildings are ways we will face the challenges posed by climate change. Protecting our quality open spaces and encouraging healthy lifestyles, more play and physical exercise are integral to improving health and well-being.

Ministerial Statement about immediately prioritising growth and jobs

- 1.8** It's pleasing Government recognises the role Planning can play in the country's future economic success. The Government's intention that the Statement be recognised as a material consideration, including by itself, in exercising development-related consents is noted.
- 1.9** To bring developments forward, developers want certainty, consistency and transparency from the planning system; our integrated service here in Oldham provides this. The LDF offers certainty about development levels required to meet our jobs and housing need but in a flexible way. The LDF has higher housing level (at least 7% more) than the UDP, and it brings forward a key development area – Foxdenton – that will improve our employment land portfolio and the economic prospects not only of the borough but also Greater Manchester. Getting the DPD in place will ensure proposals are determined against up-to-date policies, so providing certainty.
- 1.10** AGMA's joint waste and minerals DPD's are at advanced stages of preparation and will provide up-to-date policies against which to determine proposals. An Infrastructure Study has been prepared. Housing and economic studies, such as Strategic Housing Market

Assessment⁴, Strategic Housing Land Availability Assessment⁵, Affordable Housing Economic Viability Assessment⁶, Employment Land Review⁷ and Retail and Leisure Study⁸, are up-to-date and provide authoritative information for developers.

1.11 When it comes to developer contributions, our approach is flexible to take account of changing circumstances. For example, our affordable housing policy is based on `targets` and other policies make use of “where appropriate” caveats. Developments are treated on their merits. Flexibility is set out in policies such as open spaces and affordable housing, and generally the LDF (Policy 25) recognises there may be circumstances where there is a need to balance and prioritise developer contributions sought. Account is taken of viability when considering the contributions to be sought and whether it would prejudice the proposal or if there are wider community and regeneration benefits. At present developers can and do re-negotiate Section 106 agreements with the council.

1.12 A letter was circulated in April to Registered Providers to inform them of the AGMA `Principles` which, working with HCA and providers, we will seek to apply to drive housing delivery to support the Greater Manchester Strategy (GMS)⁹ and Local Investment Plan 2 (LIP2)¹⁰. Amongst these principles are commitments to: (i) ensure a pipeline of suitable sites for development, prioritising them in terms of strategic importance for AGMA and districts; and (ii) making sites in their ownership available for housing development wherever possible through, for example, contributing sites as an investment.

A new presumption in favour of sustainable development, so the default answer to development is `yes`

1.13 The intention to provide a definition of the presumption is welcomed.

1.14 The Planning and Compulsory Purchase Act 2004 (Part 3, Section 39) requires the council to prepare the LDF with the objective of contributing to sustainable development. This has been integral to the council’s preparations. Details are set out in the Sustainability Appraisal¹¹. The council will have regard to the Appraisal in determining applications.

1.15 The LDF is playing a positive role in transforming the local economy. Objective SO3¹² aims to “to promote economic diversification, growth and prosperity and the sustainable economic regeneration of the borough”. This is further supported by other LDF policies, including 1, 4, 13 and 14¹³.

1.16 The Government’s statement that development proposals should not compromise environmental protections, such as Green Belt and SSSI’s, is welcomed. Green Belt is a

⁴ CD 310

⁵ CD 307 and CD 308

⁶ CD 309

⁷ CD 329

⁸ CD 330

⁹ CD 224

¹⁰ CD 408

¹¹ CD 006

¹² CD 001, page 32

¹³ CD 001, pages 41, 53, 79, 83

valued asset here in the borough, as evidenced by the clear support for maintaining the current boundaries that has been expressed throughout the LDF consultations¹⁴ including the `Call for Sites` exercise in 2008¹⁵.

The Government wants more development in suitable and viable locations and will produce a shorter, more focused and inherently pro-growth national planning policy framework to deliver this

1.17 The council welcomes the Government's intention to improve clarity about national economic, social and environmental objectives and the planning policies to deliver them. An easier to understand, simplified planning system is in everyone's interests; from planning professionals to the lay person.

1.18 It will be important the NPPF provides clarity about appropriate matters. In line with Government advice, the council has embedded the principles of current national policies within the DPD without repeating them; for example, PPG2 on Green Belts or PPS4 on retail. It will be important to ensure the NPPF provides sufficient clarity so as to avoid policy vacuum, although in the case of retail developments the council notes the Statement's support for thriving centres and to build upon the `town centre first` policy¹⁶.

1.19 The DPD is an up to date plan. It offers flexibility. The LDF ensures the effective and efficient use of land and buildings, meets Oldham's housing needs, promotes the vitality and viability of our Centres and promotes prosperity. All these positive statements will ensure our LDF delivers sustainable economic growth and development, including the Government's named sectors¹⁷. The LDF employment policies (for the BEA's and SEA's) offer flexibility by permitting a range of commercial uses and the potential use of exceptions clauses to support regeneration or community objectives. The approach for affordable housing reflects that there may be instances where due to the viability of a development that the target of 7.5% (of the total development sales value to go towards the delivery of affordable housing) is unable to be met. In addition, we will also have the Site Allocations DPD (to start once the DPD is adopted) and we will prepare further guidance, where appropriate, to support the LDF policies that will provide flexibility and enable the council to respond to the NPPF. The council is exploring requirements for Community Infrastructure Levy.

Enable businesses to bring forward neighbourhood planning

1.20 We have engaged the business community (such as the Oldham Town Centre Partnership and Economy and Enterprise Board) in preparing the DPD. Guidance is needed about the implementation of neighbourhood plans to ensure transparency in the processes. Business-led plans will need to engage the rest of the community to ensure buy-in. Depending upon the number of neighbourhood plans taken forward, this could have significant resource implications for Oldham Council. Clarity is needed about those areas that do not opt for neighbourhood plans.

¹⁴ CD 038, CD 050, CD 061 and CD 062

¹⁵ CD 407

¹⁶ CD 405, paragraph 2.274

¹⁷ CD 405, page 8

Piloting elements of the land auctions model, starting with public sector land

1.21 The council notes the Government's plans for the use of public sector land. LIP2 sets out various approaches for the use of public sector land assets. LIP2 states that further work is being undertaken across Greater Manchester to improve the ability of AGMA/districts to maximise the leverage that can be gained from such assets. The value this can play in continuing with regeneration efforts in the former HMR areas is highlighted.

The Government will localise choice about the use of previously developed land, removal of nationally imposed targets

1.22 In terms of the proposed RSS abolition, the council has already been through a process of assessing the likely impact of RSS going for the purposes of our LDF and no policy gaps are envisaged¹⁸. In terms of brownfield land, a high target helps support the borough's regeneration by focusing appropriate development in the urban area and protects our open countryside. The amount of developable land reflects Green Belt and the borough's topography, and it is about ensuring the effective and efficient use of that which is available.

The Government will consult on proposals to make it easier to convert commercial premises to residential

1.23 It is not in anyone's interest for buildings to remain vacant. Extension of permitted development rights needs to be balanced with localism. We need to be mindful of potential impact on existing firms being affected by environmental and amenity protection matters arising from changes of use of neighbouring premises to residential.

Introduce measures to streamline planning applications removing bureaucracy from the system and speeding it up

1.24 The LDF will have fewer policies than the UDP; 25 in the DPD vs. 138 in the UDP (21 of which will be `saved` for a short period until replaced by other DPD's). The council undertakes regular monitoring to assess the effects of policies to make sure they are still appropriate.

1.25 Our joined up planning function offers consistency and transparency in determining planning applications and enforcement; the local validation checklist (updated in March 2011 after consultation with developers, agents and statutory) provides details about information needed to support proposals. Our performance levels in 2010/11 for determining `major` (70%) and `minor` (67%) planning applications exceed the national targets. Although performance for `other` planning applications dipped slightly below our usual standards, we have put in place new approaches to development management and enforcement to strengthen these areas which will exceed targets this year. Development Management will use judgements and balance the evidence and needs of an area when making decisions.

¹⁸ CD 022

Ensure a fast track planning process for major infrastructure applications

1.26 The council notes the Government's decision to move the IPC's functions for major infrastructure projects to PINS. This is not considered to have a significant impact on Oldham, although clarity will be needed about how it may relate to Manchester Airport, which is a newly designated Enterprise Zone that will provide opportunities across the conurbation.

New duty for councils and public bodies to co-operate on planning issues

1.27 Oldham Council is already doing this. The requirement for other public bodies to co-operate is welcome. Oldham is increasingly pulling its weight as a key player in Greater Manchester. Our geographic location is ideally placed to exploit links with Leeds. We have the ability and the potential to be a major player in both these economic powerhouses. We are effective at co-operating across Greater Manchester through AGMA, other local authorities and external partner agencies with well-established structures already in place. The Combined Authority and the Local Enterprise Partnership will provide us with further opportunities to co-operate on wider issues.

1.28 At the Greater Manchester level we engaged with AGMA on the GMS and the emerging Spatial Framework. We have worked with the HCA on LIP 2. We have worked with other boroughs on a number of cross-boundary planning initiatives: waste and minerals plans in recognition of their strategic nature, an energy study and the role as Low Carbon Economic Area, floodrisk assessments, housing studies, economic assessments, assessing the transport implications of developments (with the Highways Agency). Metrolink is under construction which will improve accessibility to Manchester and Rochdale and beyond.

1.29 LIP2 provides the economy and policy context for both private and public sector investment for development, growth and regeneration across Greater Manchester, including council and HCA funding, and sets out how proposals will be prioritised. LIP2 states there are three factors which will transform how AGMA and its partners will deliver economic and housing growth in GM:

- The GMS, which seeks to integrate our strategic decision-making processes to lever investment across GM, while locating delivery for maximum effectiveness at the local, neighbourhood and district level;
- The Combined Authority, which will provide a platform for the devolution of powers to ensure that key strategic issues (i.e. transport and economic development) are determined through integrated decision-making at the GM level, whilst delivery is the responsibility of the local, neighbourhood and district level; and
- The LEP, which will provide strategic private sector leadership to drive forward economic growth.

1.30 Greater Manchester is working extensively on promoting low and zero carbon energy. AGMA has published an Energy Study¹⁹. It is set in the context for Code for Sustainable Homes targets. The Study provides an evidence-based understanding of the local feasibility and potential for renewable and low- carbon technologies to supply new development. Table 7.4 (page 119) in the Study set out the technology and infrastructure costs for a

¹⁹ CD 255 - 258

number of case studies split between red-line, site-wide or near site and allowables. In each case allowable solutions would be cheaper than on-site investment. The framework proposes maximum and minimum targets. The maximum target is based upon a sliding scale of costs up to the maximum. The level at which the maximum target is set would be location-specific. An increase from the minimum target would only be justified if solutions cheaper than the base cost for the minimum target are available.

1.31 We have worked with Rochdale on jointly taking forward our housing and economic plans. This includes working to transform our local housing market offer. We've published the Oldham Rochdale Prospectus²⁰, which was prepared jointly with the HCA (and the former HMR Pathfinder and NWDA). It sets out the challenges and opportunities in this eastern part of Greater Manchester and describes a shared strategy to address and exploit them over the coming years.

Conclusions

1.32 The council is confident, through the measures we are taking and by working with partners, that the plans in place for the future have the flexibility to address the changing economic climate and will provide for regeneration, development and investment that will see a transformed borough.

1.33 The council is confident the DPD is in line with the Government's Statement, where appropriate.

1.34 The council is confident the DPD is "sound".

²⁰ CD 327