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Our Reference: DP 33

Your Reference:

16th April 2009

Dear Paul,

Consultation – Oldham Core Strategy, preferred Options.

Thank you for consulting 4NW on the above document. The following represent officer level comments on the Issues and Options Paper.

As you will be aware, the Regional Spatial Strategy for the North West of England¹ was published on 30 September 2008. The plan replaces the previous RSS (formerly RPG13).

You will no doubt also be aware of the Government's response to their consultation on the Sub National Review² and the subsequent publication of draft legislation³ which sets out the Government's plans for each region outside of London to develop a Regional Strategy (section 65).

It is intended that the Regional Strategy will in time replace the RSS and the Regional Economic Strategy (RES). The draft legislation identifies (section 65(6)) that the Secretary of State will direct which parts of the current published RSS and RES in each region will be deemed to form the Regional Strategy at the time the legislation is enacted. An important point to note is that the Regional Strategy will be part of the development plan (section 76) directly replacing the role currently occupied by the RSS.

In advance of the legislative framework, regional agencies are developing a non statutory version of the Regional Strategy for the North West. The Regional Strategy will be a new and clear strategic investment framework for the region which builds on

¹ North West of England Plan, Regional Spatial Strategy to 2021
http://www.nwrpb.org.uk/documents/?page_id=4&category_id=275

² Prosperous Places: taking forward the review of sub-national economic development and regeneration. The Government response to public consultation (25 November 2008)

³ Local Democracy, Economic Development and Construction Bill (Part 5 of the Bill)

the learning gained in the process of developing the RES 2006, the Regional Spatial Strategy and current Partial Review of RSS and the Regional Housing Strategy. This Regional Strategy will not be statutory. It will provide an important building block which will give the region a head start in the development of a statutory Single Regional Strategy once the emerging primary legislation is in place. To keep updated on what is happening with the development of the Regional Strategy – please visit the dedicated website <http://www.nwregionalstrategy.com/> and register to receive the regular email newsletter updates.

Comments

4NW recognise that our previous comments in our response on the issues and options stage have been taken on board within the production of the preferred options document. However we still have various comments to make at this stage and these are as follows –

In terms of the overall ‘Preferred Spatial Strategy’ within the document this is generally in line with the RSS, taking into consideration the RSS Spatial Framework and the development principle policies DP1, DP2, DP3, DP4, DP5, DP6, DP7, DP8 and DP9 which include spatial principles, promoting sustainable communities, promote sustainable economic development, making best use of existing resources and infrastructure, managing travel demand, increasing accessibility, marrying opportunity and need, rural issues, promoting environmental quality and addressing climate change.

In relation to the ‘Spatial Strategy’ set out within the preferred options document, 4NW support the focus of development in Oldham town centre, inner areas, regeneration areas and appropriate levels of development set out in sustainable locations within built-up areas - in line with RSS policy RDF1 (Oldham is included in the list of towns / cities stated as a third priority for development in the region.)

4NW support the policy direction which gives a clear focus to brownfield land and re-use of buildings. This is clearly in line with Policy DP4 within the RSS.

The preferred options document does fit well within the spatial priorities defined in RSS for the Manchester City Region -

Policy MCR1 – Manchester City Region Proprieties, indicates that plans and strategies in the Manchester City Region should -

- Support interventions to achieve significant improvement in the sub regions economic performance by encouraging investment and sustainable development in the regional centre surrounding inner areas, the towns/cities as set out in RDF1 (including Oldham).
- Secure improvements including enhancement of public transport links and improve the city regions internal and external transport links.
- Accommodate housing in inner areas to accommodate increase in populations and also areas accessible by public transport.

In terms of Policy MCR5 – Northern Part of the Manchester City Region, this states that plans and strategies should –

- Support the transformation of the local economy, regenerate communities and enhance the environment
- Focus employment development in towns/cities

- Expand the housing choice including size, type, tenure and affordability
- And use the HMR Pathfinder in **Oldham** and Rochdale as an opportunity for wide ranging change in economic and housing roles of these areas, the renewal of communities investment in new infrastructure.

We note within the document that 'safeguarded land' and possibly 'locally protected land' at Foxdenton is planned to be released for employment uses, including some for housing and sports. We recognise that this land was allocated within the Oldham UDP (2006). However we would like to state that if the Council did propose to use any green belt land in the future that RSS Policy RDF 4 (Green Belts) states that there is no need for any exceptional substantial strategic change to Green Belt and its boundaries in the North West within Greater Manchester before 2011.

In Policy Direction 1 of the document (Climate Change and Sustainable Development), 4NW support the text and policy context, however we would encourage the separation of 'climate change' and 'sustainable development' into two policies as they are both important and key areas of policy (which do relate to each other) however need to be considered in their own right.

Economy

The diversification of Oldham's current economic offer is a key issue for the Core Strategy to tackle, and this is highlighted throughout the Preferred Options document. Oldham's economy is largely based around the provision of manufacturing opportunities, however paragraph 4.30 indicates that, "A key objective of the borough's regeneration activities is to turn round the local economy by promoting and securing the development of knowledge based and innovative technology and industry, to provide quality jobs for local people." This proposed approach is consistent with that outlined in policies W1 and MCR5 of the RSS

The document recognises the importance of improving the Borough's economic performance, reducing unemployment levels, diversifying employment opportunities and improving average weekly wages. This approach is supported by policy W1 of the RSS where the overarching aim of the policy is to strengthen the economy of the North West. The draft policy "*Promoting Economic Regeneration, Diversification, Growth and Prosperity*" fits with the wider aspirations of policy W1 and MCR5. The Core Strategy's Vision highlights the aim of creating a "*thriving low-carbon economy (that) offers high-quality employment opportunities for local residents, based on high technology, innovation, knowledge and creative industries and environmental technologies....*" 4NW support this overarching vision.

Policy W3 of the RSS deals with the supply of employment land that is expected to be available between 2005 and 2021. Table 6.1, that features within policy W3, sets out supply and need up to 2021 for the five sub-regional areas including Greater Manchester. Despite this, the policy does not provide a breakdown of these figures to District level and to do so will require Local Authorities and other partners to work together to agree the distribution of land within each sub-region. Oldham's Employment Land Supply indicates that there is a shortfall of employment land across the plan period totalling 92.05ha's. The Core Strategy outlines three broad mechanisms to address this land shortfall as follows:

- Land Reserved for Future Development (LRFD) - including land at Foxdenton
- Release of Other Protected Open Land (OPOL) – including land at Foxdenton

- There are sites within the local masterplans that have the potential to be employment land allocations.

In relation to the land at Foxdenton, the site is clearly considered important in terms of the delivery of the employment land requirements and as such is considered to be a strategic location. Notwithstanding that we note that there appears to be issues associated with flooding on this site; will the issues be able to be overcome so to not impact on the preferred spatial distribution as set out in the document (para. 9.145). The Council may need to consider alternative spatial approaches should the flooding constraints affect delivery of the site.

The strategic sites of Hollinwood Business District, Chadderton Technology Park and in and around Oldham Town Centre are presented in the document. The appropriateness of these strategic sites should be considered through the Council's Employment Land Review, however from the detail provided in the document 4NW would support these sites.

It is indicated that a number of employment sites allocated within the current UDP will be deleted as considered appropriate so to provide a portfolio of sites that are of the correct specifications to meet future employment demands. The release of allocated sites should be carried out with consideration of policy W4 of the RSS.

Housing

In terms of the Spatial Strategy with the preferred Options document 4NW support the focus of housing development on Oldham town centre and local town centre, regeneration areas and appropriate levels in sustainable locations in built-up areas in line with RSS policy RDF1 which states that Oldham is included in the list of towns / cities as a third priority for development. We also support the re-use of previously developed land and high quality design as stated in policy direction 5 and 9.

We note that Para 9.89 states that the RSS figures only extends to 2021, however it is clearly stated in Policy L4 of the RSS that the average annual requirement will continue beyond 2021 for the purposes of producing Local Development Frameworks.

In terms of Policy Direction 9, the policy will have to set out how the Core Strategy will meet RSS figures, although it should be noted that the annual average figure can be exceeded or unmet in any one year in line with the plan, monitor, manage approach. This is set out in para 7.19 in the RSS.

In terms of Policy Direction 11 and Policy Direction 12 we welcome the overall proposed direction of the policies however in relation to PD12 it may need to be further refined in light of emerging evidence, particularly on economic viability. The policy will need to be flexible enough to respond to changing market conditions over the plan period.

Transport

In terms of transport, we recognise that our comments made on the issues and options consultation have been taken onboard and we can see progress on this policy area has occurred due to the policy directions that are set out.

The policy directions based on transport are generally in line with the key RSS policies (both relevant DP and RT policies). There is a clear knowledge and understanding of relevant regional and local transport planning policy and how this relates to Oldham.

4NW note that our previous comments on car parking standards and the work completed by Mouchel consultants on revision to the standards and also work on this within the RSS partial review have now been taken on board and are mentioned in the document.

Public transport has an important role within the preferred options, this is reflected in policy directions 7 and 8 which promote gateways and corridors for transport links including public transport (buses and trains), walking and cycling. It is encouraging to see that there are proposals to improve pedestrian and cycle access well as provide additional bus/train services. This will further encourage sustainable travel in line with RSS policies DP5, RT3 and RT9.

The importance of Travel Planning and Travel Assessments within planning applications is also acknowledged, 4NW encourage this; the inclusion of walking and cycling to work will also be important modes to target.

Environment

The text within the preferred Options document is positive in terms of the natural environment but there is a need to ensure this is continued throughout the future preparation of the Strategy.

There are a number of RSS policies which would offer further support to the document, in particular policy DP1, DP7, EM1 and EM3.

In terms of the natural environment, there is a need to ensure that growth has a limited impact on biodiversity, green areas, including open space and green belt. We are pleased to note that the Core Strategy encourages the promotion of a more integrated approach to delivering a better environment within the borough.

4NW would like emphasise the importance of protecting, conserving and enhancing the historic assets of the borough and that growth should have a positive impact on these assets. However, we are encouraged to note that maximum use will be made of previously developed land and buildings and that Policy 23 will seek to protect, conserve and enhance the Oldham's historic environment.

We welcome the inclusion of Policy Direction 19 which will identify, protect and enhance a multi-functional green infrastructure network within the borough and that consideration is to be given to the Green Infrastructure Guide⁴ for the North West

⁴ <http://www.greeninfrastructurenw.co.uk/resources/GIguide.pdf>

which provides a detailed definition of green infrastructure, as outlined in Policy EM3 of the RSS.

In relation to climate change, there is a need to ensure that new development integrates sustainable design such as Sustainable Drainage systems (SUDS) and the use of Green Infrastructure to help tackle and adapt to climate change effects. Please see RSS policies DP9 and EM5.

Wherever possible, new development should be located in areas where flood risk is low and that measures are to be taken to minimise the risk of flooding. The Core Strategy when developing Policy 4 on Water and Flooding must therefore make sure that it takes account of the actual calculated risk of flooding and levels of mitigation in the borough when deciding where development should and should not take place (please see comments above on land at Foxdenton). Sequential tests / Strategic Flood Risk Appraisal (SFRA) should highlight areas of flooding and the potential levels of risk in terms of probability analysis. Development should be guided by the technical/support document and the SFRA.

In terms of air pollution and energy issues, Oldham should ensure that the borough supports sustainable development; if the population can access jobs and services near to their homes then this has a positive affect on climate change.

There is also a need to ensure that within new development measures are taken to ensure we conserve energy and protect the natural environment, for example taking steps towards the Code for Sustainable homes. We are pleased to note that one of the key Strategic Objectives for the Core Strategy is the promotion of high quality, well designed, carbon neutral homes to meet the needs of all sectors of the communities.

EM5, EM15, EM16 and EM18 establish a framework for sustainable design and construction, including water management, energy efficiency and use of decentralised, renewable or low carbon energy. It is important to ensure that the sustainable design measures are incorporated in the development. In addition the requirements of policy EM18 should be considered i.e the setting of targets for the energy to be used in the new development to come from decentralised and renewable or low carbon energy resources.

For information, the Sustainable Energy Strategy for the region reinforces relevant policies from the RSS but more importantly offers important practical advice and information on taking these issues forward, we recognise that the recent study commissioned by 4NW on renewable energy has been taken on board within the document.

4NW (in association with a number of partners) have also produced a Sustainability Appraisal Toolkit⁵ for use with a variety of strategies and development plans. The toolkit aims to ensure integrated plans and projects create sustainable developments within the North West.

4NW's stance on sustainable waste management is a mix of policy which is set out in the RSS and also Regional Waste Strategy for the North West (RWS). The approach contained within these strategies should be viewed as a whole.

⁵ Sustainability Appraisal Toolkit – http://www.nwrpb.org.uk/?page_id=133
<http://www.sdtoolkit-northwest.org.uk/toolkit/index.php>

4NW would agree that the Core Strategy Preferred Options Paper has correctly highlighted the key issues facing Oldham with regards to sustainable waste management, including dealing with its own and imported waste arisings, ensuring sufficient provision of waste management facilities and identifying suitable sites for new or enhanced waste management facilities.

I hope this is of assistance. If you require anything more then please contact me.

Yours faithfully,



Debra Holroyd
Regional Planning Officer