

OLDHAM COUNCIL RESPONSE TO THE MATTER RELATING TO FOXDENTON AND THE SUSTAINABILITY APPRAISAL

1. This is the council's response to the invitation to comment on matters relating to Foxdenton as set out in the `Inspector Note 1 to Oldham Council` dated 20 May 2011 and Hearing Session 1.

SUMMARY OF SUSTAINABILITY APPRAISAL

2. This is a summary of the key elements of the Sustainability Appraisal.
 - Assessed the environmental impacts of the DPD and Foxdenton – and the economic and social impacts.
 - Sustainability Appraisal has met the requirements of the Strategic Environmental Assessment.
 - Sustainability Appraisal has been an iterative process.
 - The Sustainability Appraisal has been prepared in line with Government Guidance (Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, ODPM, 2005 – CD 123).
 - The sustainability appraisal process ensures that the social, environmental and economic effects of the DPD are considered during its preparation. This allows for changes to be made to the document during its preparation, or for mitigation to be identified for these effects.
 - The council's alternative strategies, the alternative options put forward by others and the preferred strategy have been appraised.
 - Foxdenton (OPOL 3 and LR 3 & 4) formed part of Option C at Issues and Options stage.
 - Other Protected Open Land (OPOL 2 & OPOL 4) remain as OPOL in the DPD to provide open land. There is also other recreational open space in the Foxdenton area.
 - Details provided in the documents at all stages.
 - Appraisals have been subject to public consultations.
 - Saddleworth Parish Council and the former HMR Pathfinder who proposed alternative options at the early stage now support the council's preferred strategy.
 - The findings of the evidence base has informed the Sustainability Appraisal.
 - Open and transparent process.
 - The Sustainability Appraisal has demonstrated that the DPD is realistic, achievable and deliverable when considered against reasonable (and proportionate) alternatives.

ABOUT FOXDENTON

3. The environmental impacts of Foxdenton have been assessed throughout the production of the DPD, through Sustainability Appraisals and Habitat Regulation Assessments.
4. Natural England, Highways Agency, Environment Agency and the Greater Manchester Ecology Unit have not objected to Foxdenton within the DPD.
5. 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 and 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 DPD which is a key delivery mechanism.

6. The Sustainable Community Strategy (CD278) has highlighted worklessness as the single most important determinant of the future prosperity and cohesion of the borough (page 12).
7. Oldham needs a large employment area that will attract new businesses in growth sectors that can assist in addressing worklessness, help tackle economic deprivation and encourage entrepreneurship and innovation.
8. Together Foxdenton OPOL 3 and LRFD 3 & 4 provide the opportunity to underpin the borough's future economic success and prosperity in line with the Government's intentions as set out in the Planning for Growth Statement (CD403). This position is set out in the council's statement (CD410).
9. Foxdenton is located within Chadderton Central and is approximately 45 hectares in total. In the Unitary Development Plan (UDP) it is designated as 'Land Reserved for Future Development' (LR3 & LR4) (28 hectares – the principle of development on this land has already been established) and 'Other Protected Open land' (16 hectares – OPOL 3).
10. The Other Protected Open Land 2 and 4 also in the Foxdenton area are remaining in the Joint DPD (together these total approximately 17 hectares). The council has recognised the important role of OPOL in the DPD as set out through the spatial vision, planning and development strategy and policies. There is also approximately 27 hectares of recreational open space around the Foxdenton area. The Foxdenton area will therefore continue to benefit from open land.
11. Foxdenton was put forward as part of the Issues and Options stage in autumn 2007 by one of the landowners who suggested the land at Foxdenton as a site for mixed development (CD061, Page 34).
12. Foxdenton is in close proximity to well established employment areas, for example Broadway Business Park.
13. A right of access has been reserved into the site off Broadway as part of the BSF proposals.
14. There is a robust and credible evidence base to justify Foxdenton. This is set out in this statement.
15. Designating Foxdenton as an employment area will contribute to the employment land required in the borough up to 2026.
16. **It is the council's view there are no 'reasonable alternatives' to Foxdenton** due to a number of issues including Green Belt constraints, topographical issues and consultation responses received throughout the preparation of the Joint DPD. **The Employment Land Review did not suggest any other alternative areas.**

EVIDENCE TO JUSTIFY FOXDENTON

17. Oldham's Employment Land Review looked at a range of methods to forecast the employment land 'need' up to 2026. It concluded that Oldham would need 81.8 hectares of employment land and that the release of land at Foxdenton for development for employment-led mixed use development is crucial. (CD329, Page 79, paragraph 10.34)
18. The report explained that in order to address employment needs, it is essential for Foxdenton, as the largest site, to be brought forward for employment through the LDF. It went on to conclude that if Foxdenton is not taken forward for employment development, Oldham will have a potential deficit of employment land up to 2026, and will have to rely on Manchester City Centre and our neighbouring district's key sites to provide opportunities for the workforce in the future, and/or rely on small sites which will not help with the borough's economic transformation.
19. Greater Manchester Employment Land Position Statement – This document was commissioned by AGMA to update the 'employment land 'need' for the ten Greater Manchester authorities. It concluded that Oldham would need to plan for between 69 and 133 hectares of employment land for the plan period (CD233).
20. ORESA prospectus – The Oldham and Rochdale Economic and Skills Alliance produced a prospectus to set out the two borough's opportunities, achievements and challenges in the current time. It states that Foxdenton along with the existing Broadway site and Hollinwood, will form a much larger and more significant employment site – Oldham's M60 Employment Zone (CD327, page 27).
21. Strategic Housing Land Availability Assessment identified land at Foxdenton. (CD308, page 67).
22. It is the council's view there are **no 'reasonable alternatives' to Foxdenton** due to a number of issues including Green Belt constraints, topographical issues and consultation responses received throughout the development of the Joint DPD. The **Employment Land Review did not suggest any other alternative areas.**
23. The findings of the evidence base has informed the sustainability appraisal process.
24. The council is confident the DPD is sound, including in relation to assessing its environmental impacts and in relation to Foxdenton.

BACKGROUND TO THE SUSTAINABILITY APPRAISAL REPORT - PROCESS

25. A Sustainability Appraisal has assessed these impacts both of the DPD and also Foxdenton. This is CD006.
26. This Sustainability Appraisal has been prepared to meet the requirements of the European Strategic Environmental Assessment Directive (SEA).
27. Other Assessments of the environmental impacts of the DPD and Foxdenton include:
 - Habitats Regulations Assessment (CD 008)
 - Floodrisk Assessment (CD 363)
 - Transport Modelling (CD 333)
 - Landscape Character Assessment (CD 357)

- Urban Historic Landscape Characterisation Project (CD 349)
28. The sustainability appraisal process ensures that the social, environmental and economic effects of the DPD are considered during its preparation. This allows for changes to be made to the document during its preparation, or for mitigation to be identified for these effects.
 29. This Sustainability Appraisal has been prepared to meet the requirements of the European Directive 2001/42/EEC. This requires a Strategic Environmental Assessment (SEA) of DPDs.
 30. Page 14 of SI 2004 No. 1633 (The Environmental Assessment of Plans and Programmes Regulations) states that “these Regulations implement Directive 2001/42/EC”... “the Directive”.
 31. Paragraph 2.3 in the final SA (CD006, page 8) explains that each SEA Directive requirement has been highlighted in the Sustainability Appraisal.
 32. Appendix 2 in the Sustainability Appraisal Report (CD 006) brings together the points in the report where the SEA Directive is met. These details are also in the Scoping Report.
 33. The Sustainability Appraisal also addresses the requirements of other legislation including the 2004 Planning Act (Section 39).
 34. The Sustainability Appraisal has been based on advice contained in Government guidance on sustainability appraisals (Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, ODPM, 2005 – CD 123).
 35. The Sustainability Appraisal has been an iterative process.
 36. The Sustainability Appraisal included 35 Sustainability Objectives – consisting of economic, environmental and social objectives. The Sustainability Appraisal objectives were assessed against the plan objectives to test the compatibility of the two sets of objectives. This is shown in Appendix 1 (CD006, page 40).
 37. The Sustainability Appraisal Report documents that the council has prepared are:
 - Oldham LDF Proposed Submission Sustainability Appraisal Report, September 2010 – CD006.
 - Oldham LDF Proposed Submission Sustainability Appraisal Report Non Technical Summary, September 2010 – CD007
 - Refining Options Sustainability Appraisal, April 2010 – CD033
 - Refining Options Sustainability Appraisal Non Technical Summary, April 2010 – CD034
 - Refining Options Sustainability Report Scoping Report Update III, April 2010 – CD035
 - Preferred Options Sustainability Appraisal, March 2009 – CD045
 - Preferred Options Sustainability Appraisal Non Technical Summary, March 2009 – CD046
 - Preferred Options Sustainability Appraisal Scoping Report Update II, March 2009 - CD047

- Issues and Options Sustainability Appraisal, November 2007 – CD055
- Issues and Options Sustainability Appraisal Non Technical Summary, November 2007 – CD056
- Issues and Options Sustainability Appraisal Scoping Report, April 2007 – CD057
- Issues and Options Sustainability Appraisal Scoping Report Update I, September 2007 – CD058

38. Each of these have been subject to consultation.

39. Details of the appraisals can be seen in each of the SA reports. However, the DPD appendices (CD002) is referred to the most below as this “tells the story” of how we have arrived at the preferred way forward. This is also set out in the final SA (CD006).

40. The Sustainability Appraisal Report sets out the appraisal methodology, relevant baseline information, the sustainability objectives and key sustainability issues and problems. It follows on from the Sustainability Appraisal for the Refining Options, Preferred Options and the Issues and Options stages of the joint DPD. The report considers any significant social, environmental and economic effects and any mitigation methods. It also sets out the indicators for monitoring the joint DPD.

THE PROCESS

41. The first part of the sustainability appraisal process was the preparation of a Scoping Report (CD057). This is known as Stage A of the sustainability appraisal process. This was an initial evidence gathering stage and involved consultation with key bodies and stakeholders.

42. The Scoping Report (CD57) can be viewed on the council’s website. Document ‘Update 1’ (CD058), produced in September 2007, summarises comments received to the consultation, and the council’s responses. It also summarises changes made to the Scoping Report as a result of the consultation. Document ‘Update 2’ (CD047) was published in March 2009 containing updates to the original Scoping Report and Update 1. A further document ‘Update 3’ (CD035) was published in April 2010, which provided further updates. These update reports should be read alongside the original Scoping Report.

43. Stage B of the process involved testing the compatibility of the strategic objectives against the sustainability objectives. Appendix 1 (CD006) summarises this exercise. This was followed by an appraisal of the preferred way forward, core strategy policies and development management policies. This involved assessing these against the sustainability objectives. Appendix 4 and 5 (CD006) contains the results of the appraisal. Details of the appraisal of the alternative strategies considered at Issues and Options stage, and alternative options suggested by respondents to the Issues and Options consultation are shown in the Sustainability Appraisal report (CD006, section 5, pages 19-32; and CD045, Appendix 6).

44. The sustainability appraisal allowed the Joint DPD to be evaluated against economic, environmental and social objectives to fully assess it in terms of its contribution to promoting sustainable development.

Section 2 of the Sustainability Appraisal Report (CD006) sets out the Appraisal Methodology.

45. The appraisal involved assessing the preferred way forward, proposed core strategy policies and development management policies against the sustainability objectives. Appendix 4 and 5 (CD006) contain the results of the appraisal. The appraisal results of the alternative options considered at Issues and Options stage, and alternative options suggested by respondents are summarised in the Sustainability Appraisal Report for the 'Preferred Options' stage (CD045, section 5) and in the DPD Appendices (CD002, pages 144-150).

Section 3 of the Sustainability Appraisal Report (CD006) sets out the Background to the Report.

46. This includes:
- Purpose of the Sustainability Appraisal and the Sustainability Appraisal Report, including the requirements of the SEA Directive and how the SA Reports addresses this.
 - Plan objectives
 - Compliance with the SEA Directive/Regulations
47. Section 3 of the Sustainability Appraisal (CD006, pages 10-13) sets out the background to the Sustainability Appraisal. This acknowledges that an environmental report shall assess:
- “the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium, long term, permanent and temporary, positive and negative effects”;
 - “an outline of the reasons for selecting the alternatives dealt with”;
 - “the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme” (page 10).

48. The Sustainability Appraisal addressed these matters.

Section 4 of the Sustainability Appraisal Report (CD006) sets out the Sustainability Objectives, Baseline and Context.

49. This includes:
- **Links to other policies, plans and programmes and sustainability objectives.**
50. The SEA Directive requires that the sustainability appraisal takes account of the relationships between the joint DPD and other relevant policies, plans, programmes and sustainability objectives at the international, European,

national and local levels. This enables relationships and synergies to be identified and exploited, and ensures that any inconsistencies can be addressed/mitigated.

51. The Scoping Report highlighted the main aims and objectives of other relevant documents, which were considered in the sustainability appraisal.
52. The Scoping Report can be viewed on the council's website. Documents added as result of the consultation, and in the interests of ensuring consideration of the most up to date relevant documents, are set out in documents 'Update 1', September 2007, 'Update 2', January 2009 and 'Update 3' April 2010.

- **Description of the social, environmental and economic baseline characteristics and the predicted future baseline.**

53. The Scoping Reports present a summary of the statistical baseline information currently available in relation to the joint DPD. The information is used to help predict and monitor possible effects. It also helps to identify sustainability problems and alternative ways of dealing with them. Baseline information consists mainly of indicators although both quantitative and qualitative information can be used. It is recognised that baseline data will need to be reviewed and updated as necessary. A summary of the indicators is included in section 7.5 (CD006).

- **Identifying sustainability issues and problems**

54. The Scoping Report outlines the key sustainability issues in Oldham in relation to the joint DPD as required by the SEA Directive. These are listed under the headings (CD057, pages 10-22):
- Social Progress which recognises the needs of everyone (Social issues)
 - Effective protection of the environment (Environmental issues)
 - Prudent use of natural resources (Environmental issues)
 - Maintenance of high and stable levels of economic growth and employment (Economic issues)

Limitations of the information and difficulties in collecting information

The Sustainability Appraisal Framework, including objectives, targets and indicators

55. The sustainability appraisal framework is used as a tool to appraise the joint DPD. The process of developing the sustainability appraisal framework involves the formation of sustainability objectives. The objectives help identify any problems and issues and potential beneficial impacts of the joint DPD.
56. The sustainability objectives have been developed from the baseline data and the objectives drawn from sources set out in the Scoping Report.

Section 5 of the Sustainability Appraisal Report (CD006) sets out details of assessments of the alternative strategies.

57. This includes:

- The assessment of the Alternative Spatial Strategies originally proposed by the council
- the assessment of the Alternative Options put forward by others
- the assessment of the 'Preferred Way Forward' spatial strategy.

Section 6 of the Sustainability Appraisal Report (CD006) sets out details about the Impacts of the DPD.

Section 7 of the Sustainability Appraisal Report (CD006) sets out details of the Implementation of the DPD.

58. This includes:

- Links to other tiers of plans and programmes.
- Monitoring arrangements

Appendix 1 shows the assessment of the compatibility of the Sustainability Objectives against the DPD Strategic Objectives

Appendix 2 shows details of the compliance with the SEA Directive and Regulations

Appendix 3 shows details of consultees.

Appendix 4 shows details of the appraisal of the spatial strategy.

Appendix 5 shows details of the appraisal of the policies, including summary of the impacts.

59. The appraisal has assessed the impacts in the short, medium and long term and the scale (local and transboundary) of the strategy and policies at all stages.

FOXDETON

Evidence base

60. The proposals for Foxdenton are supported by the following pieces of evidence base:

- Greater Manchester Employment Land Position Statement, August 2009 (CD233)
- ORESA Prospectus - The Oldham and Rochdale Economic and Skills Alliance, June 2009 (CD327)
- Oldham's Employment Land Review, March 2010 (CD329)
- Oldham LDF Proposed Submission Habitats Regulations Assessment, September 2010 (CD008)
- Assessing the Transport Impacts of the Local Development Framework, December 2009 (CD333)
- Strategic Housing Land Availability Assessment, January 2011 (CD308)
- Oldham Strategic Flood Risk Assessment, January 2010 (CD363)
- Oldham Landscape Character Assessment, August 2009 (CD357)
- Oldham Urban Historic Landscape Characterisation Project, January 2010 (CD349)

61. The evidence base has fed into the Sustainability Appraisal, where appropriate.

Comments received at Proposed Submission stage

62. At 'Proposed Submission' stage we had 14 people comment on Foxdenton. Of this there were only six people who objected to the designation of Foxdenton. However when we recorded the comments received in relation to Foxdenton we took the decision, where the respondent had not specified which part of the document they were commenting on, to record the comments against every part of the document that Foxdenton is referred to. This had the effect of increasing the number of comments recorded about Foxdenton. (Page 3 and 4, Public Schedule).

63. No objecting comments in relation to Foxdenton were received from the following statutory consultees:

- Highways Agency
- Environment Agency
- Natural England

SUSTAINABILITY APPRAISAL STAGES – GENERAL AND FOXDENTON

SCOPING REPORT

64. The council published a Sustainability Appraisal Scoping Report in April 2007 (CD057). This report covered:

A1-The key sustainability objectives of other relevant plans, policies and programmes (this detail is set out in the Scoping Report, section 2 and Appendix 1)

A2 -The relevant baseline data for Oldham (this detail is set out in Scoping Report section 3 and Appendix 2)

A3 -The key sustainability issues and problems for Oldham relating to environmental, social and economic factors (this detail is set out in Scoping report section 4 and Appendix 3)

A4 - The Sustainability Framework (i.e. objectives and indicators) (this detail is set out in Scoping report section 5 and Appendix 3)

65. Appendix 4 of the Scoping Report sets out the list of consultees that were consulted on the Sustainability Appraisal Scoping Report. This included the three statutory consultees (Natural England, Environment Agency and English Heritage).

SCOPING REPORT UPDATE I

66. An Update to the Scoping Report (Update I) was published in September 2007 (CD058). This document provided a summary of the responses received on the Scoping Report, changes made to the Scoping Report resulting from the consultation, amendments made in the interests of ensuring that it included the most up to date information and editorial changes to ensure consistency.

ISSUES AND OPTIONS

General

67. A Sustainability Appraisal was carried out for the Joint DPD 'Issues and Options' stage. The Sustainability Appraisal report (CD055) and its non technical report (CD056) were published in November 2007.

68. At Issues and Options stage we asked people about three options:

Option A - Focused Regeneration – focused development on regeneration areas including Oldham Town Centre and HMR area. **This option involved maintaining the Green Belt, Other Protected Open Land (OPOL) and Land Reserved for Future Development (LRFD).**

Option B – Urban Concentration - spread the growth and development around the borough. **This option involved maintaining the Green Belt, Other Protected Open Land (OPOL) and Land Reserved for Future Development (LRFD).**

Option C – Urban concentration including planned expansion – **built on option B but also considered the potential release of Other Protected Open Land (OPOL) and Land Reserved for Future Development (LRFD).**

69. The Issues and Options stage were accompanied by maps which showed the status of land for each of the above options (CD053, pages 64, 66, 69).

70. Issues and Options (CD053, page 38) discussed issues relating to safeguarded land and protected open land.

71. Paragraph A2.5 (CD002, page 144) explains how we arrived at the three options. It explains that we had regard to national, regional and local guidance, policies and evidence. It states in relation to OPOL and LRFD that the UDP explained that non Green Belt land would be the first locations to be considered for development if and when we needed to identify new development opportunities. The council explains that we wanted to consult with people on whether the time had arrived to release some or all of these sites for the plan period. The emerging findings from our work on Employment Land showed that we needed to consider some potential releases if we were to improve our local economy by providing a portfolio of employment sites that were fit for the 21st century.

72. The assessment of the three options can be seen in CD055, pages 32-44.

73. The DPD Appendices (CD002, pages 144-146, Tables 14-16) provides a summary of the Sustainability Appraisal on each of the three options.

74. Paragraph A2.17 in the DPD Appendices (CD002) explains that in response to the Issues and Options consultation around three quarters of respondents expressed a preference for one of the options. Of these:

- Around half preferred Option A
- Around a sixth preferred Option B
- Around a quarter preferred Option C

75. A handful of respondents preferred Options A and B and one preferred a combination of A and C (CD002, paragraph A2.18).
76. Three alternatives were suggested by a handful of respondents (CD002, DPD Appendices, page 148, paragraph A2.22). These were:
- 'Targeted Regeneration' submitted on behalf of amongst others Saddleworth Parish Council and the Saddleworth and Lees Community Council;
 - 'Transformation and Cohesion' submitted on behalf of the Oldham and Rochdale Housing Market Renewal Pathfinder
 - 'Regeneration and Sustainable Communities' Submitted on behalf of Purico, the development agency of Whiteoak and Hollowoak Limited, owners of the Robert Fletchers estate at Greenfield Saddleworth (this option involves facilitating edge of settlement development/ expansion).
77. None of the submitted alternative options included a Sustainability Appraisal. In the absence of this the council therefore undertook its own appraisal of these alternatives. Table 17 in the proposed submission appendices (CD002, page 148) details this appraisal. Although elements of the council's own options could be found in parts of the submitted alternatives, it was the council's view that none of the alternatives should be adopted as the council's preferred way forward for the LDF.

Foxdenton

78. **Foxdenton formed part of Option C** which considered the release of Land Reserved for Future Development and Other Protected Open Land. It scored higher than Options A and B, particularly in relation to promoting economic growth which reflects the potential economic benefits of releasing LRFD and OPOL. This is shown on map CD053, page 69.

PREFERRED OPTIONS

General

79. A Sustainability Appraisal was carried out for the Joint DPD 'Preferred Options' stage and published in March 2009 (CD045), alongside a non technical summary (CD046). An update to the Scoping Report (Update II) (CD047) was also published to include any new plans, policies or programmes that needed to be taken into account and amend any monitoring indicators.
80. The DPD Appendices (CD002, page 150, paragraphs A2.24) explains that at Preferred Options Stage the council had firmed up its way forward for the LDF by focusing growth on sustainable and accessible locations in the built-up areas, including regeneration areas, combined with a limited release of safeguarded and protected land at Foxdenton.
81. The Sustainability Appraisal (CD002, page 150, paragraph A2.25) explains that the preferred way forward for the LDF addresses a range of policy agendas; jobs, homes, environment, countryside, transport, open spaces, 'centres', shopping and so on. It is focused on the quality of our places and creating healthier lifestyles, economic prosperity and sustainable communities, but in ways that reduces our impacts on global and local environments. The way forward, and the alternative options that we consulted upon, was guided

by the fact the LDF does not start with a blank sheet of paper. There are a range of successful initiatives already in place to guide the regeneration of the borough – ‘Oldham Beyond’ visioning exercise, the Oldham Rochdale Housing Market Renewal Pathfinder (HMR), the Hathershaw and Fitton Hill New Deal for Communities (NDC) programme, the Metrolink proposals, the Sustainable Community Strategy and Local Area Agreement, for example – that the LDF aims to build upon.

82. Paragraph A2.26 (CD002, page 150) explains that the council took into account a number of factors in determining the way forward. These include:

- i. national policies;
- ii. Oldham’s local aspirations for economic prosperity, health and well-being, and safe and strong communities as outlined in ‘Oldham Beyond’, the Sustainable Community Strategy and the Local Area Agreement;
- iii. Greater Manchester’s ambitious plans for growth and development as set out in the Greater Manchester Strategy;
- iv. local area masterplans and regeneration initiatives such as HMR and NDC;
- v. education proposals for the borough such as the regional science centre;
- vi. findings from the evidence base;
- vii. the alternative options that were considered as part of the earlier stages;
- viii. findings from the Sustainability Appraisal and the Habitats Regulations Assessment; and
- ix. feedback from talking with people.”

83. Paragraph A2.27 states that (CD002, page 150) The council’s view was that the strategy that was best suited to delivering Oldham’s aspirations for transformation and regeneration was not directly any of the options and submitted alternatives considered at Issues and Option stage but was a combination or ‘hybrid’ of the three alternatives.

84. Paragraph A2.28 (CD002, page 151) states that the council’s preferred way forward is about regeneration, promoting economic prosperity, and creating safe and strong sustainable communities. This will be achieved by:

- i. focusing appropriate housing, retail and employment development on Oldham Town Centre and the borough’s other centres, ensuring that the scale and nature of new development is well related to the role, function and character of the borough’s centres; in regeneration areas (such as Housing Market Renewal), at the key locations (such as Hollinwood Business District, Chadderton Technology Park and Foxdenton), at key transport points like future Metrolink stops; but at the same time permitting appropriate levels of development in sustainable and accessible locations within the built up areas of the borough (including the Saddleworth villages) to meet the needs of local communities.
- ii. maximising opportunities to recycle brownfield land and conversion of buildings, ensuring that new developments are built using sustainable construction techniques and securing high quality design of new development.

- iii. maintaining Green Belt boundaries.
 - iv. protecting appropriate areas of locally protected open land (OPOL – except OPOL 3) and safeguarded land (LRFD at Bullcote Lane) from development.
 - v. recognising the role of Manchester City Centre and our neighbouring district's key sites (such as Kingsway, Ashton Moss and Central park) offer to the borough's economy, whilst at the same time providing employment land for businesses locally.
 - vi. securing an efficient transport system including the Metrolink proposals through the borough, and promoting alternative means of travel to the private car such as encouraging walking, cycling and use of public transport.
 - vii. protecting, conserving and enhancing the borough's natural, built and historic environments.
 - viii. protecting and enhancing existing green infrastructure, and where appropriate providing new quality and accessible open spaces, to promote health and well-being.
 - ix. addressing the transformation education agenda and the programme for new health and well-being centres and facilities.
85. Table 18 in the DPD Appendices (CD002, pages 151-155, paragraph A2.29) sets out the Preferred Way Forward and the evidence to support the strategy as well as showing how the preferred way forward links to the original options consulted on. This shows that the preferred way forward is to maintain OPOL, except for Foxdenton (OPOL 3), and release Land Reserved for Future Development at Foxdenton. This approach linked to environmental protection, promoting regeneration and economic prosperity. Evidence to support this included the Employment Land Review, Strategic Housing Land Availability Assessment and consultation responses.
86. Tables 19-21 (CD002, pages 155-158) in the DPD Appendices provide a summary of the Sustainability Appraisal of the preferred way forward that forms part of the DPD.
87. Paragraph 5.17 (CD006) in the final Sustainability Appraisal states that the council's preferred way forward is considered to be **realistic, achievable and deliverable**. It is also the most appropriate planning and development strategy for Oldham. In relation to the three alternatives the majority of housing will be in Oldham Town Centre and regeneration areas. This links to Option A and reflects the findings of the recent assessment of potential housing land that demonstrated these areas could accommodate the majority of the borough's housing potential. Employment development will be more dispersed around the borough due to its nature and location, particularly the location of existing employment areas and links to Option B. Small amounts of currently safeguarded land and locally protected land will be released under the preferred way forward which links to Option C.
88. The Sustainability Appraisal at Preferred Options Stage demonstrated that the preferred strategy was more sustainable than the other options considered (paragraph 5.18, CD006).
89. The Preferred Approach did not change after the Preferred Options stage. The Preferred Options Public Schedule of Representations and Responses

(CD050, page 4) summarises the comments received in relation to the preferred approach.

90. Fifty seven comments were submitted about the spatial strategy. 4NW (the “regional leaders forum”) stated that the preferred strategy is generally in line with the Regional Spatial Strategy. It supports the focus of development within Oldham town centre, inner areas, regeneration areas and appropriate levels of development in sustainable locations within built up areas. NWDA welcomes and supports the approach set out in the preferred spatial strategy. So does Saddleworth Parish Council and Sainsburys. Natural England considers that their environmental interests are potentially best served by the preferred strategy. The National Trust does not object to the strategy but it does highlight the critical importance of the having a strong suite of environmental policies. Thirty five standard comments submitted by the same agent (Chorlton Planning Ltd) questioned the focus of residential developments being on the town centre and urban areas, although they accepted the preferred locations for new employment land within the strategy. The Oldham/Rochdale HMR Pathfinder supports the general thrust.

Foxdenton

91. The preferred approach included releasing Land Reserved for Future Development at Foxdenton (LR 3 & 4) and Other Protected Open Land (OPOL 3) at Foxdenton as part of establishing the principle of Foxdenton Business and Employment Area (facilitated by a small amount of housing). The summary table in the Sustainability Appraisal (CD045, pages 38-39) gives a summary of the preferred approach.
92. This recognises that in relation to economic objectives releasing land at Foxdenton will: promote sustainable regeneration over the longer term; promote sustainable economic performance particularly in the medium to longer term; make more land available for existing businesses and encourage new inward investment; provide more job opportunities, particularly in the longer term; provide more opportunities for the development of innovative and knowledge based industries.
93. In relation to environmental objectives (CD045, pages 39-42) it was recognised in the appraisal of the preferred strategy that releasing land at Foxdenton may impact on local landscape/ townscape (ENV 6) and would require careful design and landscaping, although the amount of land involved, in the overall context of the borough, is relatively small. It was also recognised that Foxdenton would require some new infrastructure (ENV11 and ENV13) and would reduce the focus of using previously developed land (ENV12), however Foxdenton and other areas of land released are relatively small areas compared to the borough as a whole. It was also recognised that development would be guided by the SFRA and development close to the Rochdale Canal would need to have regard to protecting the water resource (ENV13).
94. The preferred way forward scored positively in relation to social objectives (CD045 pages 42-43).
95. In the Preferred Options Sustainability Appraisal the council also appraised Foxdenton. The area scored positively in relation to economic objectives (CD045, pages 53-54). In relation to environmental objectives there was a mixture of outcomes. In relation to social objectives Foxdenton scored mostly positive.

96. The DPD Appendices (CD002, paragraph A2.50) explains that at the Issues Survey and Issues and Options stage respondents showed a preference for protected open land to remain protected. However at Preferred Options stage when the council was able to be more specific about land that would be released, including Foxdenton, the overwhelming majority of respondents did not object.

REFINING OPTIONS

General

97. A Sustainability Appraisal was carried out for the Joint DPD 'Refining Options' stage and published in May 2010 (CD033), alongside a non technical summary (CD034). An update to the Scoping Report (Update III) (CD035) was also published to include any new plans, policies or programmes that needed to be taken into account and amend any monitoring indicators.
98. The Refining Options Sustainability Appraisal included an appraisal of the preferred way forward. This included further detail to assess objectives, particularly environmental objectives, for example it fed in the Landscape Character Assessment, the Urban Historic Characterisation Study and the Strategic Flood Risk Assessment findings (CD 033, pages 19-32).

Foxdenton

99. General reference to Foxdenton was included within the preferred way forward. **This included further detail to assess objectives, particularly environmental objectives, for example it fed in the Landscape Character Assessment, the Urban Historic Characterisation Study and the SFRA findings in relation to Foxdenton** (CD 033, pages 19-32).
100. Foxdenton was appraised as part of the relevant policies. These all scored positively in relation to environmental, economic and social objectives.
101. In relation to Policy 1 'Climate Change and Sustainable Development', Foxdenton appeared in a number of economic sustainability objectives and scored positively due to the opportunities associated with the release of the site for employment purposes (EC4, 5, 9 and 10). They also highlighted the potential downside of Foxdenton not being delivered. For example, in EC9 'Not delivering appropriate employment opportunities may not lead to improved economic prosperity' (CD033, page 57). Foxdenton was also referenced in ENV5 (air quality), 7 (green infrastructure) and 13 (ground and surface run-off) all of which scored positively.
102. In relation to Policy 4 'Promoting Sustainable Regeneration and Prosperity' again Foxdenton appeared in a number of economic sustainability objectives and scored positively due to the opportunities associated with the release of the site for employment purposes (EC 3, 4, 9 and 10). They also highlighted the potential downside of Foxdenton not being delivered, for example in EC4 'Not delivering Foxdenton could have serious implications on our ability to achieve our economic objectives, including failure to deliver local jobs.' (CD033, page 74). In relation to the environmental objectives, Foxdenton was referenced in ENV7 (green infrastructure), 11 (sustainable use of minerals), 12 (quality of land and soil), 13 (ground and surface water) and 14 (flooding). All of

these scored positively, however it was noted that in relation to the release of Land Reserved for Future Development (LR3 & LR4) and Other Protected Open Land (OPOL 3) (at Foxdenton) this may impact on green infrastructure (ENV7). The development of Foxdenton may require some new infrastructure, however this is a relatively small area compared to the borough as a whole (ENV11, 12 and 13).

103. Policy 14 'Supporting Oldham's Economy' references back to the Sustainability Appraisal for Policy 4.

PUBLICATION STAGE

General

104. A Sustainability Appraisal was carried out for the Joint DPD 'Proposed Submission' stage and published in September 2010 (CD006), alongside a non technical summary (CD007).

105. The Final Sustainability Appraisal non technical summary explained where potential areas of tension were identified in previous Sustainability Reports (CD007, page 16) and how these had been addressed at Refining Options stage.

106. The Final Sustainability Appraisal sets out how the council arrived at the preferred way forward (spatial strategy), details of the Sustainability Appraisal undertaken on each option and alternative options put forward.

107. Section 6 of the SA report (CD006) 'Impact of the Plan' sets out the conclusions from the Sustainability Appraisal. This states that:

'The sustainability appraisal process did not identify any negative social, environmental or economic effects for the preferred way forward. The option scored positively or significantly positively in relation to all the SA objectives.'

108. The policies resulted in mainly positive social, environmental or economic effects.

109. Natural England supported the Sustainability Appraisal Report.

Foxdenton

110. Reference to Foxdenton was included within the DPD.

111. In the publication stage Sustainability Appraisal the council appraised Foxdenton within policies 1, 4, 13 and 14 (CD006 pages 120 – 125 shows the appraisal of policy 13 – Foxdenton BEA). Foxdenton scored positively in relation to the economic objectives due to the fact its designation would provide land for new businesses and provide job opportunities.

112. In relation to the Sustainability Appraisal (policy 13) environmental objectives Foxdenton largely scores positive with two unsures. The following references are made (amongst others):

- ENV1 ('To ensure the effective and efficient use of all types of land and buildings in the most sustainable locations') scored positively but explains:

“Designating this BEA will ensure the effective and efficient use of all types of land and buildings in the most sustainable locations by providing employment land on a mix of brownfield and greenfield sites in an accessible location. The Employment Land Review explains that it is necessary to use the Other Protected Open Land and Land Reserved for Future Development that is being released as part of this area in order to provide sufficient employment land to meet the borough’s employment needs over the LDF period” (CD006, page 122).

- The need to ensure that development proposals are subject to a Travel Plan to ensure that the development promotes use of public transport, walking and cycling (ENV4).
- That the development will have regard to the Landscape Character Assessment and the objectives of Chadderton Rolling Hills character area. Development proposals will be subject to a heritage assessment to ensure that development respects the Grade II listed building, Foxdenton Hall and its settings (ENV6).
- enhancing green infrastructure as part of the development (ENV7)
- Investigations must be undertaken by developers to ascertain the extent of any land contamination on the site (ENV12).
- The SFRA Level 2 has confirmed that sites are acceptable with some detailed consideration of flood risk issues. A site specific FRA would be undertaken to look at a more detailed survey of potential blockages of the Wince Brook culvert and any other flood risk issues. However, the SFRA does confirm that culvert capacity along Wince Brook is adequate provided appropriate inspection and maintenance continues. Foxdenton is within a Critical Drainage Area and the current allowable discharge rates at the time of the application would need to be implemented to reduce surface water run off and where possible the implementation of SUDs (ENV14).
- ENV 5 ‘To protect and improve air quality’ scored unsure as air quality will be dependent on the end use on the area.
- ENV11 ‘To ensure the prudent use and sustainable management of manmade and natural resources, including minerals’ scored unsure due to the fact that new infrastructure may be required as part of the development.

112. In relation to social objectives Foxdenton scored positively due to the fact it would be providing local job opportunities, in an area that has a number of local services and that the development will be of a high quality design.

Comments on Publication stage Sustainability Appraisal

113. At publication stage one comment was received on the Sustainability Appraisal. Natural England made the following comments:

“We are pleased to see that our comments on indicators made at the Preferred Options stage have been acted upon and that this has resulted in the inclusion of an indicator for landscape. We are also pleased to see an indicator for monitoring changes in areas of biodiversity importance and improved local biodiversity.”

“The absence of any negative effects is considered to be a positive attribute of the Core Strategy”.

114. The Sustainability Appraisal concludes that “the sustainability process did not identify any negative social, environmental or economic effects the policies

resulted in mainly positive effects although some resulted in 'largely positive but some uncertainties' or 'unsure.'

MINOR CHANGES

115. The council has prepared a list of minor changes (CD004), which were submitted alongside the submission documents to the Planning Inspectorate. The council are of the opinion that these minor changes do not impact on the Sustainability Appraisal undertaken at publication stage (CD006).

CONCLUSIONS FROM 'OTHER' EVIDENCE:

OLDHAM LDF PROPOSED SUBMISSION HABITATS REGULATIONS ASSESSMENT (CD008)

General

116. Greater Manchester Ecological Unit (GMEU) undertook the council's Habitats Regulations Assessment (HRA) (as required by the Habitats Directive 2007) throughout the preparation of the LDF.

117. The Greater Manchester Ecology Unit (GMEU) provides specialist advice to, and on behalf of, the ten district councils that make up Greater Manchester on biodiversity, nature conservation and wildlife issues. Although hosted by Tameside MBC, GMEU works across the whole of Greater Manchester.

118. The lead on the HRA throughout the whole LDF process has been Derek Richardson MIEEM, who is the Principal Ecologist at GMEU. Derek has also taken the lead on liaising with Natural England on the HRA.

119. A HRA was required as the council has the following two European Sites within the borough:

- South Pennine Moors Special Area of Conservation (SAC) / Special Protection Area (SPA)
- Rochdale Canal Special Area of Conservation (SAC)

120. GMEU are familiar with the above two European Sites and with developments affecting them.

121. Paragraph 1.7 of the submitted HRA states:

"There is no statutory guidance on what stage of Plan production to best prepare an HRA but Natural England recommends that HRA begins at an early stage and if necessary continues through all the stages of plan production. HRA Methodologies are at a relatively early stage of development and examples of Best Practice have not yet emerged. As Best Practice emerges the methodology undertaken for this HRA may develop."

122. The HRA was prepared with Natural England's involvement. The stages of the HRA are set out below:

- HRA on Joint DPD 'Issues and Options' stage (CD059).
- HRA on the Joint DPD 'Preferred Options' stage (CD048)

- HRA on the Joint DPD 'Refining Options' stage (CD036).
- HRA was published at the publication stage (CD008).

123. The conclusions from the latest HRA (CD008) are:

124. That "Screening has concluded that the implementation of the Plan will not have a significant impact on the special interests of this European Site" (South Pennine Moors SAC/SPA) (HRA, page 17).

125. The HRA also states that "It is recognised that there is a degree of reliance placed on the operation of overarching policy objectives, development management policies and other strategies and plans to ensure that no significant impacts on the Rochdale Canal arise from the implementation of the Plan. I am however convinced that **sufficient safeguards exist in the Joint DPD and other plans and strategies to justify this reliance that there are enough safeguards in place in the Joint DPD to ensure that no significant impacts on the Rochdale Canal arise from the implementation of the Plan**" (HRA, page 23, paragraph 9.4, 2010).

126. The HRA goes on to state:

*'Recent (last ten years) developments along the Rochdale Canal corridor have shown that it is possible to allow for relatively large-scale developments close to the Canal (and affecting the Canal directly) without causing significant harm to the special interests of the SAC, providing that appropriate precautions are taken. I would therefore consider it unreasonable (over-cautious) for this Assessment to conclude that all development in areas of Oldham close to the Canal should be avoided. In reaching this conclusion I have considered the likely type of development that will be brought forward in these areas, (that is, development will not be related to potentially polluting heavy industries). The Assessment has therefore concluded that, although development is proposed in areas relatively close to the Canal, providing that mitigating plans, policies and strategies are adopted and implemented appropriately through the development management process, **in principle development areas planned for in the Joint DPD can be allowed to go forward without harm being caused to the special interest of the Rochdale Canal SAC.** This Opinion is based on this Screening Opinion supplemented by the experience and knowledge of the author in assessing the impacts of developments considered to have the potential to affect the special interest of the Canal'* (HRA, page 23, paragraph 9.5, 2010).

Foxdenton

127. Table 7.1, page 20 of the final HRA (CD008) looks specifically at Foxdenton. This explains that the mixed use nature of the proposed development at Foxdenton and the existence of possible pathways between the area and the canal are considered to have some potential to cause impacts on the canal arising from water and air pollution. Details of these impacts cannot be properly assessed because details of specific developments are not yet available. The assessment considers the principle of allowing the area to be put forward as a broad preferred location and whether there are sufficient safeguards in place to allow sites to be brought forward for development without damaging the integrity of the European Site. The table lists ten mitigation plans, policies and strategies (including DDP policies) that are available. Table 7.1 (page 20) **states that providing that mitigating plans, policies and strategies are**

implemented appropriately through the development management process, it is considered that there will be sufficient safeguards in place to avoid significant harm to the special interest of the Rochdale Canal arising from the development of Foxdenton. It is considered that there is insufficient justification for preventing all development in this area because of potential impact on the SAC.

128. The HRA recommended that any development coming forward in areas within the plan, including Foxdenton, be referred for Appropriate Assessment as part of the development management process so that appropriate mitigation for any damaging impacts can be properly planned and implemented (HRA, page 23, paragraph 9.6, 2010). This recommendation has been carried through into the DPD (see paragraph 6.132, Joint DPD 'Proposed Submission' – CD001).

129. The council has included a few minor changes in the 'List of minor amendments' (CD004). These do not affect the outcome of the HRA.

130. The council and GMEU are of the view that the HRA satisfies the requirements of the Directive and is robust to ensure the continuing protection to the highest level nature conservation sites in the borough.

131. The findings of the HRA informed the Sustainability Appraisal.

ASSESSING THE TRANSPORT IMPACTS OF THE LOCAL DEVELOPMENT FRAMEWORK (CD333)

132. Oldham Council has worked with the Highways Agency and AGMA on 'Assessing the Transport Impacts of the Local Development Framework'. Information on Foxdenton informed modelling work. In relation to impact on journey times the report concluded that there would be an increase in journey times clockwise on the M60 of between 1 and 2 minutes. The report stated that the increases were "consistent with the increases in traffic expected as a result of the concentration of employment development near to the M60" (CD333, page 13, paragraph 4.7). The Highways Agency supports the Joint DPD.

OLDHAM STRATEGIC FLOOD RISK ASSESSMENT (CD363)

General

133. Floodrisk Assessments have been prepared as part of the preparation of the DPD, including working with AGMA, and in particular Bury and Rochdale to ensure cross-boundary issues are addressed.

Foxdenton

134. A Strategic Flood Risk Assessment was carried out by JBA Consulting for Oldham (2010), including a level 2 SFRA which looked at Foxdenton.

135. The Environment Agency was part of the Project Steering Group.

136. The SFRA has concluded that development on Foxdenton is acceptable subject to detailed consideration of floodrisk issues at the masterplanning and development management stages. It has outlined a mitigation strategy for Foxdenton.

137. Table 9-1 gives a summary of potential mitigation measures (page 59, CD363). For Chadderton this includes site layout and design, modification of ground levels, building design, resistance and resilience.

138. The Environment Agency support the Joint DPD.

139. Findings of the SFRA informed the Sustainability Appraisal.

OLDHAM LANDSCAPE CHARACTER ASSESSMENT (CD357)

140. The Oldham Landscape Character Assessment was published in 2009. This describes the landscape character of the borough's Green Belt. Foxdenton falls within closest proximity to 'Area 3 Chadderton Rolling Hills'.

141. Development proposals are required to have regard to the LCA as set out in Policy 6 and 21.

142. Findings of the Landscape Character Assessment informed the Sustainability Appraisal.

OLDHAM URBAN HISTORIC LANDSCAPE CHARACTERISATION PROJECT (CD349)

143. An Urban Historic Landscape Characterisation Project was completed in 2010 by the Greater Manchester Archaeological Unit (GMAU). The GMAU acts as the archaeological curator for the ten Districts of Greater Manchester. The staff provide advice across the county on all matters relating to archaeology, including appropriate protection and recording measures on development sites.

144. The Project recognises the Historic Landscape Character of Foxdenton, including Foxdenton Hall Park and the site of Foxdenton Hall and Farm (HLC Ref HGM21417).

145. Paragraph 6.57 of the DPD (page 87) states that development proposals for Foxdenton must be subject to a heritage assessment.

INSPECTOR'S NOTE QUESTION 2) - THE EXTENT TO WHICH THE COUNCIL CONSIDERS THAT SUCH ENVIRONMENTAL IMPACT CAN APPROPRIATELY BE CONSIDERED AT THE SUBSEQUENT SITE ALLOCATIONS DPD STAGE.

146. The council is committed to the preparation of a Site Allocations DPD.

147. Details about its preparation and timetable are set out in the Local Development Scheme.

148. The Site Allocations DPD will follow on after the Core Strategy and Development Management Policies DPD.

149. In preparing the Site Allocations DPD, the council will undertake all requirements of relevant legislation.

150. The council will undertake a Sustainability Appraisal for the Site Allocations DPD. This will include Scoping Report and will assess the environmental, economic and social impacts of the site allocations.

151. This Sustainability Appraisal will address the requirements of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations.

152. At the site allocations stage, other assessments of sites will be undertaken including:

- Site-specific Floodrisk Assessments.
- Ecology assessments to satisfy the requirements of the Habitats Directive.
- Heritage assessments, where appropriate.
- Site-specific contaminated land surveys, where appropriate.
- Site-specific transport assessments.

153. The council is confident that the environmental impacts of site allocations can be appropriately considered at the Site Allocations DPD.

INSPECTOR'S NOTE QUESTION 3) - THE REQUIREMENTS OF THE ENVIRONMENTAL ASSESSMENT OF PLANS AND PROGRAMMES REGULATIONS 2004 (SI 2004 NO.1633).

154. The council has had regard to the above requirements. The SA has addressed the matters covered by the Environmental Assessment of Plans and Programmes Regulations 2004. Details are as set out above. Details are also set out in the Sustainability Appraisal Report (CD 006).

INSPECTOR'S NOTE QUESTION 4) - THE RELEVANCE AND IMPLICATIONS OF 2 HIGH COURT JUDGMENTS: SAVE HISTORIC NEWMARKET LTD (AND OTHERS) V FOREST HEATH DISTRICT COUNCIL AND SSCLG (CASE NO. CO/6882/2010, 25 MARCH 2011), AND CAPEL PARISH COUNCIL V SURREY COUNTY COUNCIL (CASE NO. CO/5684/2008 AND 0510/2009).

155. The Council has noted the two Court judgments. The case of Capel Parish Council v Surrey County Council (2009) concerns the planning inspectors wrongly applying a presumption of soundness, which affected their conclusion on waste development plan documents. The Council is satisfied that it has submitted what it considers to be a sound plan and does not consider that the case has any implications for Oldham's DPD.

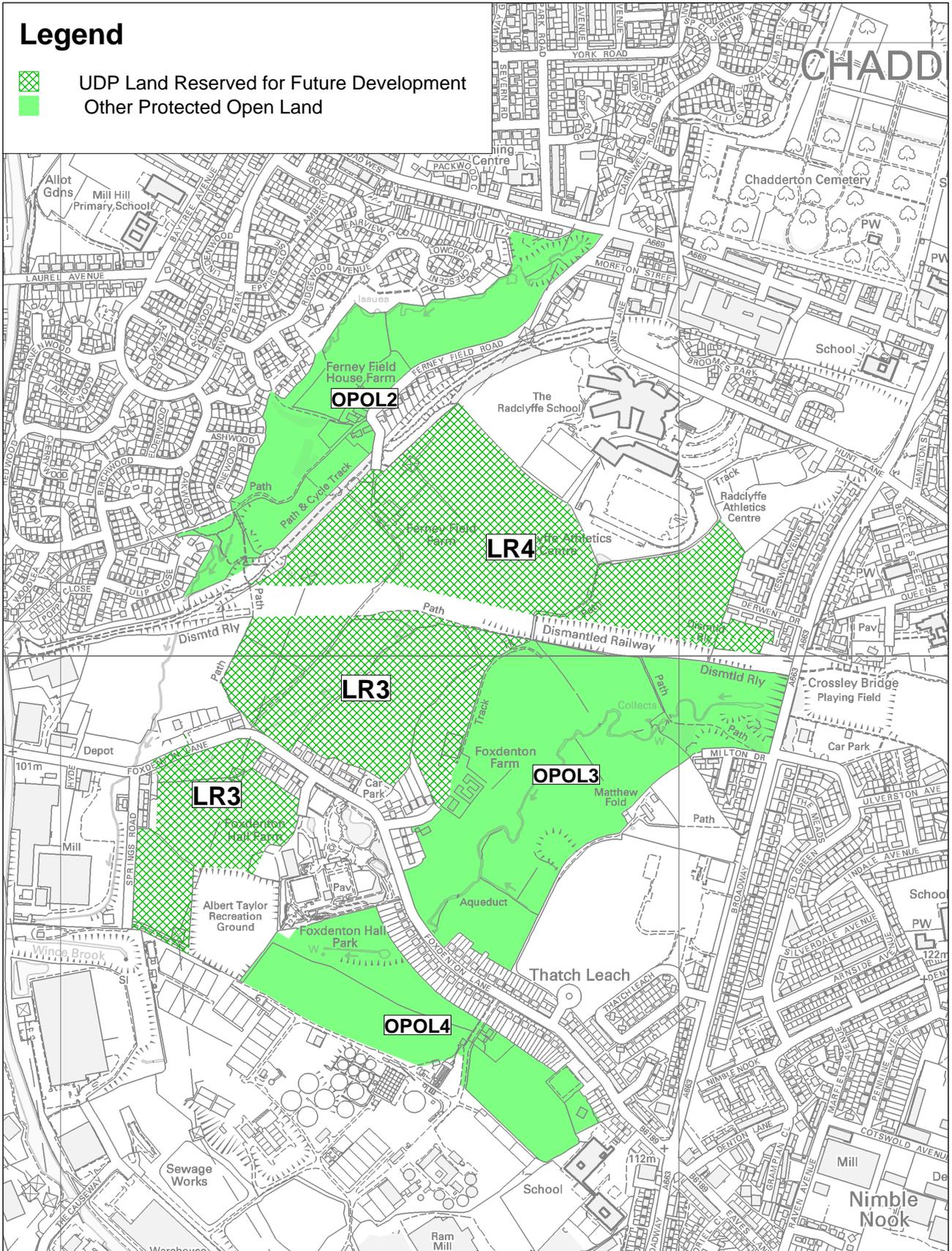
156. The case of Save Historic Newmarket Ltd and others v Forest Heath District Council and SSCLG (2011) concerns the planning authority's failure to comply with the requirements of Directive 2001/42 and the Environmental Assessment of Plans and Programmes Regulations 2004, in that the final report accompanying the proposed core strategy was flawed as it did not tell consultees the reasons for rejecting any alternative locations for the urban development. It is Oldham Council's view there are no 'reasonable alternatives' to Foxdenton due to a number of issues, including Green Belt constraints, topographical issues and consultation responses received during the preparation of the DPD. The Employment Land Review did not suggest any other alternative areas. This position has been set out in the DPD, the Sustainability Appraisal and the evidence base during the preparation of the DPD. The Council is satisfied that it has provided sufficient information to consultees to meet the requirements of the Regulations and therefore this case also does not have any implications for Oldham's DPD.

157. As set out above, the environmental, economic and social impacts of the DPD have been assessed. Oldham Council has prepared a Sustainability Appraisal Report having regard to the legislation, guidance and procedures. The requirements of the SEA Directive / Environmental Assessment of Plans and Programme Regulations have been addressed. A robust and credible evidence base has been prepared to support Foxdenton. Foxdenton BEA is not just Other Protected Open Land, it is also Land Reserved for Future Development unlike the court cases which referred to the "whole site". The council has undertaken public consultation at the different stages of preparation of the DPD. Natural England support the Sustainability Appraisal. The Environment Agency and the Highways Agency support the DPD.

158. The council is confident the DPD is sound, including in relation to Foxdenton.

Legend

-  UDP Land Reserved for Future Development
-  Other Protected Open Land



Drawn by:	
Division:	
Drawing No:	
Date: 06:06:11	Scale: 1:9000

Economy, Place and Skills Directorate
 Oldham Council
 Level 3
 Civic Centre
 West Street
 OL1 1UH



Oldham
Council

Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Oldham MBC Licence No. LA 0100019668, 2009