Housing Delivery Test

Part 1: Context, evidence and root causes for housing delivery in Oldham

August 2019

Oldham Council

1 Introduction

1.0.1 This Action Plan sets out the identified root causes for housing under-delivery within Oldham. Part 2 (which is contained in a separate document) sets out how the council intends to improve delivery, in order to ensure that we provide a diverse Oldham Housing Offer that is attractive and meets the needs of different sections of the population at different stages of their lives.

1.1 Purpose of the report

1.1.1 The Housing Delivery Test (HDT) has been introduced by the Government as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT measures net additional dwellings provided over the past three years against the homes required over the same period.

1.1.2 Results on performance for each local planning authority in England are published annually in November.

1.1.3 The consequences of failing the Test are set out in revised National Planning Policy Framework (NPPF).

1.1.4 Oldham's Local Plan was adopted more than five years ago. In accordance with the Housing Delivery Test Rule Book [(1)]the district's HDT result is therefore calculated using homes delivered in the previous three years and the household projections (for those years) as set out in the transitional arrangements. The first set of HDT results were published 19 February 2019 [(2)], using the previous three complete financial years of 2015/16, 2016/17 and 2017/18. The results for Oldham are shown in the table below.

Table 1: Housing Delivery Test Measurement, February 2019

	Total number of homes required (2015-2018)*	**Total number of homes delivered (2015-2018)**	**Housing Delivery Test: 2018 measurement**	**Housing Delivery Test 2018 consequence**
Oldham	1,394*	899	64%	Action Plan and 20% Buffer
*2015/16 number of homes required = 289 + 2016/17 number of homes required = 446 + 2017/18 number of homes required = 660 **= 1,394 homes required 2015-2018**				

1.1.5 As set out above, Oldham Council has delivered 64% against the HDT requirement. As a consequence, there is a need to:

- Produce an Action Plan identifying and analysing causes of under-delivery and setting out actions to address them; and
- Identify a 20% buffer of deliverable housing land in addition to the existing sites identified in the five-year housing land supply.

1 available at https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book
2 available at https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement

1.1.6 An Action Plan is intended to be a practical document, focused on effective measures aimed at improving delivery within an area underpinned by local evidence and research of key issues. The Action Plan will be a live document, reviewed and updated as appropriate.

1.1.7 This is Oldham Council's first Action Plan, drawn up in response to the Housing Delivery Test Measurement published February 2019.

1.1.8 We do not currently have a five-year deliverable housing land supply or the 20% buffer as required by the HDT Measurement 2018. This is based on the latest position set out in the Strategic Housing Land Availability Assessment as at 1 April 2018. As set out paragraph 3.0.1 an updated housing land supply position, which will be as at 1 April 2019, is currently being prepared.

1.2 Relationship to other strategies and plans

1.2.1 The Action Plan complements a number of existing Council plans, policies and strategies which together provide a framework for the delivery of the council's housing priorities.

Oldham's Housing Strategy

1.2.2 The Council's new Housing Strategy 2019 aims to provide a diverse Oldham Housing Offer that is attractive and meets the need of different sections of the population at different stages of their lives.

1.2.3 The Housing Strategy sets out a number of opportunities the Council, and its partners, has to improve our housing offer and our place offer, these include:

- Building new homes at the level to increase the housing choices available so that more people can find a suitable home in a place they like and at a price they can afford.
- The delivery of a broader range of housing tenure and type, particularly in the most disadvantaged areas, to reduce social and economic segregation and achieve a better mix of incomes.
- Explore new housing development models, such as a Local Housing Company and alternative financial incentive schemes.

1.2.4 To meet these challenges, and more, the Housing Strategy sets out a series of actions, which include those around:

- Building more homes to provide greater choice in type, size, tenure and affordability.
- Partnerships with committed developers and registered housing providers to build homes and better places.
- Improving the viability of difficult sites with developers.
- Support for self-build and co-operative community-led models of housing.
- The council's direct role in the delivery of new homes.
- Improve co-ordination between housing and planning.

1.2.5 These actions are supported by a delivery plan which will facilitate their implementation. The Housing Delivery Action Plan is not intended to repeat the Housing Strategy Delivery Plan, but supports its implementation as appropriate.

Oldham Town Centre Masterplan Vision

1.2.6 Oldham Town Centre has an important role to play in the delivery of our future housing growth and addressing our local housing needs. Through a series of building blocks and priority areas, the council's vision is that Oldham Town Centre will become a place that thrives, where our ambition for housing can be a catalyst for change.

1.2.7 Through delivering this vision it is the Council's ambition to have quality town centre homes that:

- Increase the population living in the town centre
- Increase the footfall in the town centre;
- Increase the number of young people staying in the borough;
- Give a wider choice of residential options for all;
- Support an increase in the town centre leisure offer; and
- Decrease anti-social behaviour.

Oldham's Local Plan

1.2.8 The current Local Plan (the joint Core Strategy and Development Management Development Plan Document) was adopted in November 2011. This sets out a housing requirement of 289 dwellings a year for the plan period.

1.2.9 As the Local Plan was adopted more than five years ago, The Core Strategy housing requirement figure has been superseded by central government's standard methodology for calculating local housing need. This highlights the need to review our Local Plan.

1.2.10 The council is in the process of reviewing the Local Plan. Consultation on the Regulation 18 Notification was carried out in August 2017 and the next stage will be consultation on the Issues and Options. Updates on the Local Plan timetable will be made available in due course on the council's website at www.oldham.gov.uk.and as part of a revised Local development Scheme.

Greater Manchester's Plan for Homes, Jobs and the Environment

1.2.11 The Greater Manchester Plan for Homes, Jobs and the Environment (or GMSF) is being prepared by the Greater Manchester Combined Authority (GMCA), which comprises the Mayor of Greater Manchester and the leaders of Greater Manchester's ten local councils.

1.2.12 It is proposed the GMSF will:

- set out how Greater Manchester should develop up until 2037;
- identify the amount of new development that will come forward across the ten districts, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused;
- support the delivery of key infrastructure, such as transport and utilities;
- protect the important environmental assets across the city region;

- allocate sites for employment and housing outside of the existing urban area; and
- define a new green belt boundary for Greater Manchester.

1.2.13 For Oldham it proposes a housing requirement of 752 new homes a year or 14,290 across the plan period as a whole (2018-2037). Policy GM H-1 proposes that this is then phased over the plan period as follows:

- 450 new homes a year from 2018-2023; increasing to
- 860 new homes a year from 2024-2037.

1.2.14 The GMSF recognises that if Greater Manchester is to meet its future housing requirements, there is a need to identify additional sites across the city-region. The only realistic option for doing so is to remove some land from the Green Belt in strategic locations. Chapter 11 sets out a series of strategic allocations proposed in Oldham with a capacity to deliver just over 4,000 across the GMSF plan period (2018-2037).

1.2.15 Table 2 in the following section sets out Oldham's Local Housing Need (LHN) alongside the current Local Plan and draft GMSF housing requirements.

1.3 Approach and methodology

1.3.1 The remainder of the Action Plan includes the following:

- Housing delivery and supply analysis *(contained in Part 1)*;

- A summary of findings and key issues from the Developers Forum *(contained in Part 1)*;

- Key actions and responses *(contained in Part 2)*; and

- Project management and monitoring arrangements *(contained in Part 2)*.

2 Housing delivery analysis

2.0.1 This section provides an analysis of housing delivery in the borough over the last ten years.

2.1 Oldham's local housing need

2.1.1 As outlined above, Oldham's current Local Housing Need (LHN) is based on central government's standard methodology. This uses the 2014-based household population projections, adjusted for affordability. As per this methodology, Oldham's LHN is 692 homes a year.

Table 2: Oldham's Housing Requirement

Local Plan requirement	289 new homes a year
GMSF 2019 draft requirement	752 new homes a year
2019 local housing need (based on central government's standard methodology)	692 new homes a year
Difference between Local Plan and the 2019 LHN / draft GMSF requirements	Between 403 and 463 additional new homes required a year compared to the Local Plan requirement.

2.1.2 The figures above illustrate the scale of the challenge given the difference between our Local Plan requirement, the 2019 LHN which currently applies, and the proposed GMSF housing requirement.

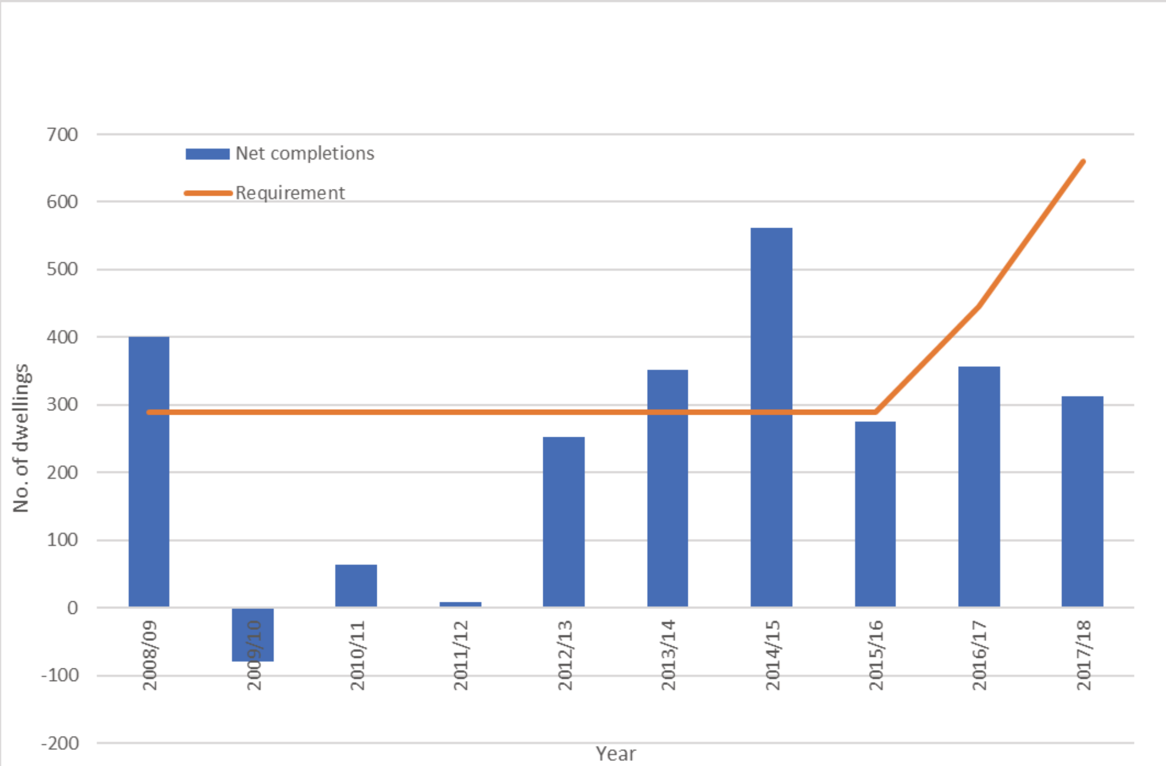
2.1.3 As such, scaling up the level of development over the next five years, and making sure we deliver the right mix, type and affordability of homes in each neighbourhood to make Oldham an attractive place to live, is going to require a whole new way of working.

2.2 Completions

2.2.1 Over the last ten years, 2,503 (net) new homes have been completed. This represents an average of 250 homes per year. As illustrated by figure 1 this is 915 homes less than the housing requirement [1] for the same period (3,418 homes).

1 The requirement is based on that identified in Oldham's Joint Core Strategy and Development Management Development Plan Document (the Local Plan) for the period 2008/09 to 2014/15 and then the requirement identified through the Housing Delivery Test measurement (published February 2019) for the period 2015/16 to 2017/18.

Figure 1: Net Completions 2008/09 to 2017/18

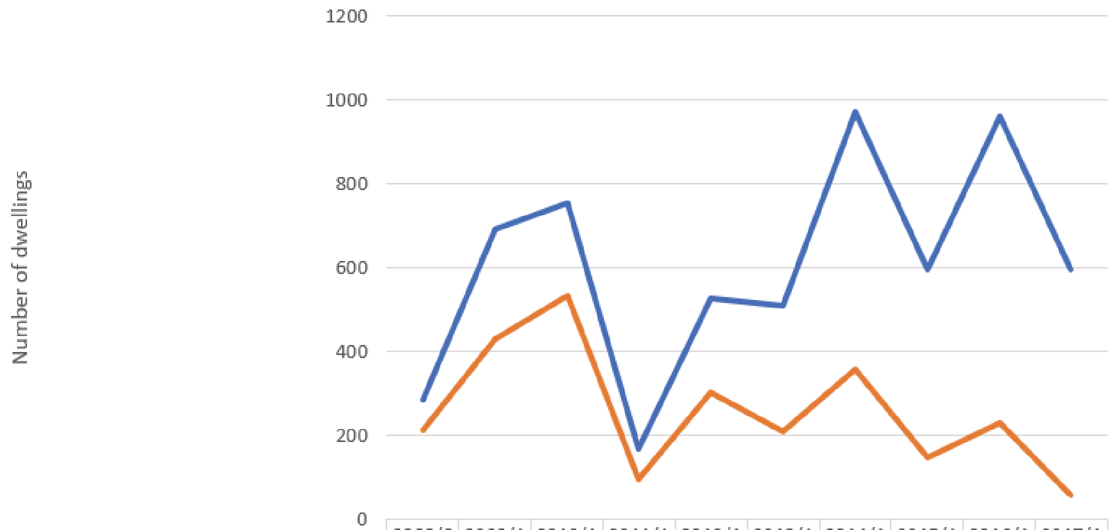


2.2.2 High levels of clearance that has taken of place as result of regeneration activity across the borough during the period 2008/09 to 2012/13 is a significant contribution to under-delivery. Large scale clearance has now come to an end. With exception of 2015/16, the net completions have exceeded the Local Plan housing requirement over the last five years, with an average of 372 new homes per year being completed over this period.

2.3 Implementation of planning permissions

2.3.1 Figure 2 shows the rate of delivery compared to the number of permissions granted over the last ten years. It demonstrates that with exception of two years (2008/09 and 2011/12) the number of new homes granted permission has far exceeded the (Local Plan) housing requirement for the borough (of 289 dwellings per year).

Figure 2: Residential permissions compared to completions 2008/09 to 2017/18



	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Capacity of sites granted permission	282	691	754	167	524	509	970	594	959	596
No. of dwellings completed on these sites	210	430	531	93	301	209	356	145	230	54

Years

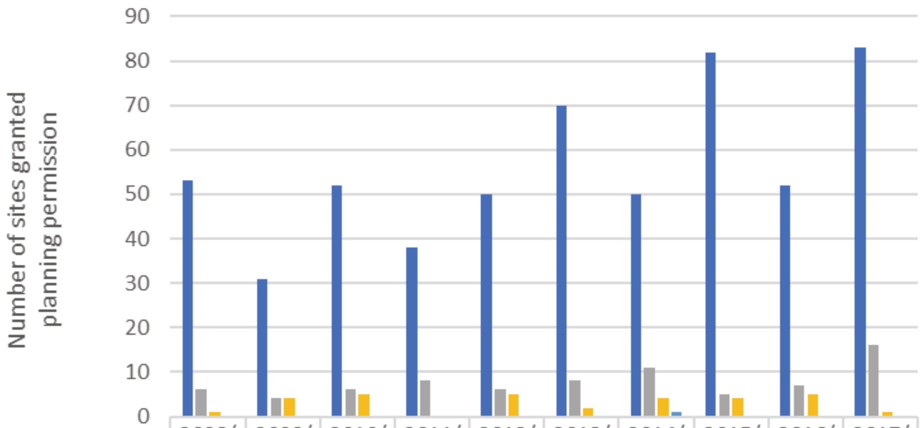
2.3.2 Over the period, approximately 670 sites have been granted planning permission, generating a potential yield of just over 6,000 homes. However, less than half (42%) have been completed, although it must be borne in mind that a significant number of these were only granted permission in the last three years. As such, there is still time for these to come forward.

2.3.3 Further analysis of the sites that have been granted permission for housing in the last ten years and their progress of these sites shows that over this period (since 2008) an average of 20% of these have lapsed, meaning an equivalent of 840 homes cannot come forward unless a fresh application is submitted and granted. On average, every year since 2008/09 122 homes are not commenced.

Size of sites coming forward

2.3.4 Analysis between 'minor' and 'major' residential development sites, as defined by NPPF, shows that minor sites (of between 1 and 9 dwellings) make up 84% of the sites granted planning permission in the last 10 years. Major sites (of more than 10 dwellings) make up 16%.

Figure 3: Number of sites with planning permission by site size 2008/09 to 2017/18

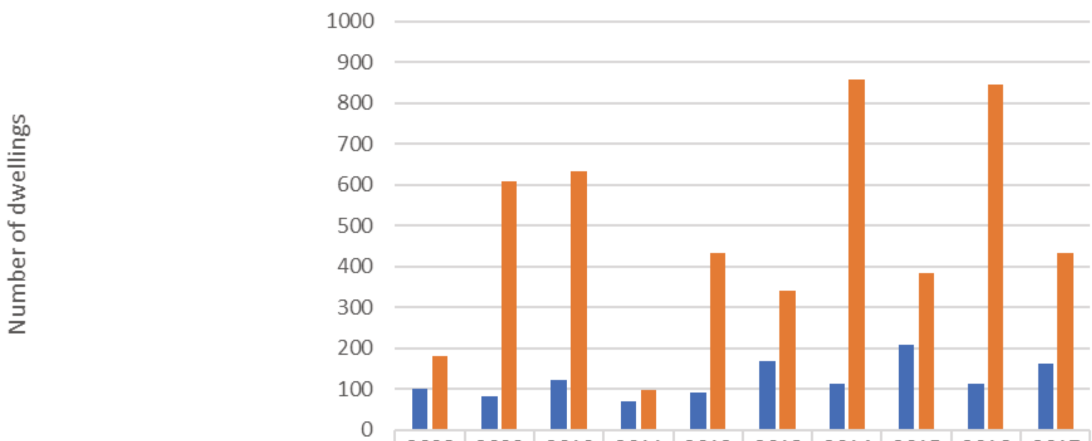


	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Sites with less than 10 dwellings	53	31	52	38	50	70	50	82	52	83
Sites with 10 to 49 dwellings	6	4	6	8	6	8	11	5	7	16
Sites with 50 to 199 dwellings	1	4	5	0	5	2	4	4	5	1
Sites with 200+ dwellings	0	0	0	0	0	0	1	0	0	0

Years

2.3.5 Despite the above, figure 4 shows that 80% of the total number of homes granted planning permission over the last 10 years are on major sites. Therefore, whilst the number of major sites is relatively low, they form the significant proportion of our supply in term of number of new homes.

Figure 4: Number of dwellings with planning permission by site size 2008/09 to 2017/18



	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
No. of dwellings granted permission on minor sites	101	82	121	70	92	168	112	209	113	163
No. of dwellings granted permission on major sites	181	609	633	97	432	341	858	385	846	433

Year

2.3.6 Analysis shows that 17% of dwellings granted permission on major sites have expired, which is a similar lapse rate to the overall supply. This includes nine sites of over 50 dwellings, with a capacity for 762 new homes, where planning permission has expired without implementation. Further details regarding this can be found in Appendix 1.

Build-out rates

2.3.7 Analysis shows that larger schemes tend to be commenced faster than the smaller schemes as shown in table 3 below. This is possibly related to the fact that for larger schemes to come forward as an application in the first place there must be a certain level of investment and confidence in the deliverability of the site. There are also relatively few larger schemes so, again, any that do are more likely to be those where there is an active developer.

Table 3: Lead-in times and build out rates

Site of site (dwellings)	Time from PP to first commencement (range)	Time from PP to first commencement (average)	Average time from PP to site completion	Average time from commencement to completion	Average no. of dwellings completed p.a.
100+	3-18 months	9 months	20-49 months (range)	16-44 months (average)	62
50-99	1-35 months	10 months	22 months (average)	17 months (average)	49
20-49	1-35 months	11 months	32 months	16 months	20
10-19	1-35 months	13 months	29 months	18 months	10
5-9	1-59 months	19 months	34 months	18 months	5
Under 5	1-116 months	25 months	36 months	13 months	1

2.3.8 The build out rates also show that the number of completions on major sites per year on site within planning permission are relatively high and schemes tend to be built out quickly, within two to three years.

2.3.9 The relatively quick completion times and what appear to be healthy build-out rates are somewhat at odds with the low level of development that is taking place in the borough. For example, as table 3 shows, it appears that if a scheme does commence, it tends to get built quickly.

2.3.10 However, the analysis shows that there is an issue with planning permission being implemented and also in terms of the scale of development coming forward, with only one large-scale major scheme (200+ homes) at Foxdenton receiving permission in recent years. This may be due to the lack of large-scale allocations and land availability and is a significant driver for reviewing and adopting a new Local Plan.

2.3.11 With regards to minor sites, it would indicate that there is less of a market for these sites or in cases where they are for individual houses perhaps there isn't the impetus to deliver the dwelling quickly.

3 Housing land supply analysis

3.0.1 Analysis within this section is based on the housing land supply as at 1 April 2018 as identified in the Council's Strategic Housing Land Availability Assessment (SHLAA) and Monitoring Report (AMR). An updated housing land supply position, which will be as at 1 April 2019, is currently being prepared and will be used to inform the update to this report following publication of the next HDT result in November 2019.

3.0.2 The SHLAA (as at 1 April 2018) identifies a baseline housing land supply of 10,838 homes. This increases to 11,233 homes when taking into account the small sites and clearance allowances.

3.0.3 A breakdown of the housing land supply as at 1st April 2018 is shown in table 4 overleaf.

Table 4: Breakdown of the housing land supply as at 1 April 2018

SHLAA category	Total dwellings 2018-2023	Total dwellings 2023-2028	Total dwellings Years 11+	Total dwellings - all periods	% of supply (dwellings)	Total of number of sites	% of supply (sites)
Sites under construction	1123	0	0	1123	10	144	27
Sites with extant planning permission	1383	321	200	1904	18	213	40
Saved UDP Phase 1 housing allocations	130	244	0	374	3	9	2
Saved UDP Phase 2 housing allocations	0	354	82	436	4	7	1
Lapsed and Stalled sites >5 dwellings	0	776	343	1119	10	44	8
Potential sites	89	2394	3399	5882	54	115	22
SUBTOTAL	*2725*	*4089*	*4024*	*10838*	100	532	100
Current small sites allowance minus any small sites already identified in supply	0	165	330	495			
Current clearance allowance	25	25	50	100			
TOTAL	**2700**	**4229**	**4304**	**11233**			

3.1 Current Position of Housing Allocations

3.1.1 UDP Phase 1 and Phase 2 Housing Allocations have been saved as part of the Local Plan through Policy 3 'An Address of Choice' with the intention being at the time that these would be assessed as part of the preceding Site Allocations Development Plan Document (DPD). However, progress regarding the Site Allocations DPD was put on hold in light of the GMSF and it is now proposed to consider these as part of the wider Local Plan review.

3.1.2 Table 4 shows that 54% of the existing housing land supply is on potential housing sites. This means that 46% of the supply is on sites within the planning system. This includes those that are under-construction, have planning permission (outline and full), existing housing allocations, and where planning permission has lapsed or development has stalled.

3.1.3 The UDP organised the housing allocations into two phases – Phase 1 sites which were intended to meet short and medium term needs, and Phase 2 sites which form a pool of sites for the longer term or in circumstances where the monitoring process indicates that there is likely to be a sustained shortfall in the envisaged Phase 1 supply. These phasing arrangements are no longer considered applicable.

3.1.4 Analysis of the allocations indicates that 45%, or 13, of the 29 allocations have been completed, three of which are part completed with some elements of the allocation remaining uncompleted as at 1 April 2019. These are all phase 1 housing allocations.

3.1.5 There are eight phase 1 housing allocations remaining:

- Two form part of a wider mixed-use allocation which include active employment uses (land at Oldham Road / Hardman Street (M3) and Huddersfield Road / Dunkerley Street (M4);
- Two have been constrained due to their listed building status (Bailey Mill (H1.1.5) and Hartford Mill (H1.1.27));
- Two are active employment sites (Pretoria Road (H1.1.23) and Jowett Street (H1.1.25)); and
- Two have planning permission and either the S106 has not been signed (Springhey Mill (H1.1.21)) or the permission has lapsed (Blackshaw Lane (H1.1.29)) therefore their status has reverted to allocated.

3.1.6 It would appear, therefore, that there are a number of issues preventing these sites from coming forward, whether it be site constraints relating to their listed status, current use and multiple ownerships or viability.

3.1.7 Planning permission has been granted for seven dwellings on Land at Holden Fold (H1.2.13). Seven out of the eight phase 2 housing allocations are therefore remaining, with a granted application for three dwellings at Ashton Road, Woodhouses albeit not the full indicative capacity identified as part of the housing allocation.

3.2 Lapsed and Stalled Sites

3.2.1 This category includes sites that have previously had planning permission for housing but where this has expired before being implemented. It also includes "stalled" sites which are classed as those that have been granted permission and construction has begun (or a material start has been made) but where there has been no development activity for at least five years (i.e. before the previous NPPF was published).

3.2.2 In the lapsed and stalled category there are 29 sites of 10 dwellings or more, with the capacity to provide 1,121 dwellings. Nine of these sites have a capacity of between 50 to 199 dwellings. These are listed in table 5 below. There are no 200+ dwelling sites.

Table 5: Lapsed and stalled sites with capacity of 50 dwellings and above, as at 1 April 2018

Site name	Land Type	Area (ha)	Dwellings
53 - 55 King Street (formerly Riley Snooker Club and Megson and Ponsonby Solicitors), Oldham, OL8 1EU	BF	0.15	126
Land at Schofield Street, Ashton Road and Copsterhill Road, Oldham	BF	6.5	121
Thornham Mill, Oozewood Road, Royton, OL2 5SJ	BF	0.419	71
Money Controls Ltd, New Coin Street, Royton, OL2 6JZ	BF	2.53	139
Land at Derker (Abbotsford Road Site), Abbotsford Road/Vulcan Street, Derker, Oldham	BF	1.18	65
Former Springhead Quarry, Cooper Street, Springhead, Oldham	BF	2.33	50
Land off Wellyhole Street, Oldham	BF	0.897	56
Land at North Werneth Zone 4, Land bounded by Suthers Street to the north, Edward Street to the south and the railway line to the west.	BF	1	62
Land at North Werneth Zone 5, Land bounded by Hartford Mill to the west, Edward Street to the north, and Milne Street to the east.	BF	1.39	72

3.2.3 The reasons for these lapsed sites are varied. They are all brownfield sites and some are in active employment use and therefore may have issues regarding viability and other constraints that need to be overcome. The derelict Hartford Mill is also having a detrimental impact on the surrounding area and preventing the sites at North Werneth from coming forward. For these reasons these sites are identified in the post five-year housing land supply as developable in years 6 to 10 and 11+ recognising the constraints that need to be overcome in order to secure their delivery.

3.3 Housing Land Supply by Land Use

3.3.1 A significant proportion of the housing land supply as at 1 April 2018 includes sites that are currently in other uses, such as employment, but there are reasons to assume that housing could be achievable on the site in future.

3.3.2 Reasons which may make such a site suitable include:

- the site has been suggested as potential housing land through the Call for Sites process by the owner;
- it is within an existing residential area;
- land adjacent or close to the site has been granted permission for housing and this may have changed the character of the area;

- it is not fully occupied or is no longer fit for purpose to meet modern business needs or practices; or
- circumstances have changed which mean that a former use is no longer viable or appropriate.

3.4 Housing Land Supply by Type

3.4.1 Table 6 shows that an average of 70% of all homes identified as part of the baseline housing land supply is on brownfield land. This does not include the brownfield element of ‘mixed’ sites, which are a mix of brownfield and greenfield land.

Table 6: Breakdown of housing land supply as at 1 April 2018 by land type

Category	Brownfield	Greenfield	Mixed	Total
Sites under construction	797	76	250	**1,123**
Sites with extant planning permission	1,165	269	470	**1,904**
Saved UDP Phase 1 housing allocations	360	14	0	**374**
Saved UDP Phase 2 housing allocations	0	436	0	**436**
Lapsed and stalled sites >5 dwellings	949	62	108	**1,119**
Potential sites	4,353	353	1,176	**5,882**
Total	**7,624**	**1,210**	**2,004**	**10,838**

3.4.2 74% of the new homes identified on potential sites and 85% on lapsed and stalled sites fall on brownfield land. There is therefore a need to ensure that brownfield sites come forward for development. A significant proportion of these sites are for between 50 to 199 homes and 200+ homes, offering significant opportunities to broaden the breadth of development opportunities across the borough.

3.5 Housing Land Supply by Size

3.5.1 Analysis of the housing land supply as at 1 April 2018 by site size shows that 49% of the supply is made of sites with a capacity to deliver between 50 to 199 dwellings. 24% is on sites with a capacity of 10 to 49 dwellings, 20% on large-scale major sites and 8% on minor sites with a capacity to deliver less than 10 dwellings.

3.5.2 The large-scale major sites include three key sites within Oldham Town Centre and which form part of the Council's regeneration plans for the area:

- Town centre western gateway site A with an indicative capacity of 329 homes;
- Town centre western gateway site B with an indicative capacity of 495 homes; and
- Land at Southlink with an indicative capacity of 450 homes.

3.5.3 The potential sites, 74% of which are on brownfield land, provide an opportunity to respond to some of the issues identified by the evidence in relation to build-out rates and larger sites coming forward for development more quickly.

3.6 Housing Land Supply by Owner

3.6.1 *Table 7: Breakdown of housing land supply as at 1 April 2018 by land owner*

Category	Dwellings in the Housing Land Supply by type of land owner					
	Local authority	Registered Provider	Other public body	Private	Mixed	Total
Sites under construction	329	19	0	775	0	1123
Sites with extant planning permission	110	13	0	1242	539	1904
Saved UDP Phase 1 housing allocations	14	0	0	192	168	374
Saved UDP Phase 2 housing allocations	78	0	0	358	0	436
Lapsed and stalled sites >5 dwellings	134	0	0	848	137	1119
Potential sites	1686	6	8	2894	1288	5882
Total	2351	38	8	6309	2132	10838

3.6.2 As table 7 shows, 22% of the housing land supply is on local authority owned sites, offering significant opportunities to boost housing delivery across the borough. In addition to this, a proportion of the mixed ownership category includes sites which are also part owned by the local authority, which presents the opportunity for new ways of partnership working to bring these sites forward.

3.7 Five-year Housing Land Supply Position

3.7.1 The SHLAA as at 1 April 2018 sets out the Council's latest five-year housing land supply position.

3.7.2 Based on the LHN figure we are unable to demonstrate a five-year housing land supply as at 1 April 2018.

3.7.3 An updated five-year housing land supply position will be published as part of the updated SHLAA for 1 April 2019.

4 Current progress

4.0.1 A developers forum was held on the 7th May 2019 to which representatives from housebuilders, registered providers and planning agents operating within the borough were invited.

4.0.2 The forum provided an opportunity to discuss and explore the key reasons for under-delivery of housing and how these may be overcome.

4.0.3 It is hoped that the developer's forum will be held every six months, providing an opportunity to gain insight into the main issues facing housing delivery across the borough and to help inform the on-going implementation of the Housing Delivery Action Plan.

4.0.4 To summarise, in terms of under-delivery the main reasons were found to be:

Type of sites coming forward:

- Small sites (up to 50 dwellings) suffer from market and funding pressures more easily and can therefore be difficult to bring forward.
- Lack of large sites with the capacity for 100/200+ dwellings that are attractive to volume housebuilders.

Supply and demand:

- Lack of sites in appropriate and desirable locations.
- Concerns regarding the deliverability of the potential housing land supply – many have ownership issues, are contaminated or in active employment use.
- Some sites, such as Hartford Mill, are holding back the development and viability of neighbouring sites due to their negative impact on the area.

Delivery:

- Lack of qualified labour in terms of construction and skills shortage.
- Supply chain for materials is under significant pressure and may be unable to cope with increased housing requirements.
- Rules and restrictions of funding opportunities.
- Developers expectations regarding the Council's flexibility to dispose of land both directly and / or below market value.

Viability:

- Particular issues regarding bringing brownfield sites forward and the ability to meet requirements in relation to affordable housing, open space, supporting infrastructure, design and construction.
- Issues that impact on viability need to be set out and agreed at outline planning application stage.
- Gap funding required to help bring sites forward.

Wider issues:

- Quality of place and neighbourhood in order to attract people to move into new houses.
- Town centres at present are not suitable for large scale housing. Further investment is required and issues such as crime, anti-social behaviour and lack of facilities (beyond retail) need to be addressed.

Process issues:

- Poor communication between different departments in the Council results in mixed messages.
- Lack of support from the Council in terms of delivering sites.
- Lack of clarity regarding what is required of development (i.e. developer contributions, standards and planning requirements).
- Process can be too lengthy, due to for example lack of officer resources, the agreement and signing of S106's and discharge of planning conditions.
- Lack of a formal pre-application service.

The main <u>mechanisms to address under-delivery</u> were considered to be:

Type of sites coming forward:

- Identify a range of deliverable and viable sites, including larger sites capable of delivering 100/200+ dwellings.
- Delivery of brownfield sites in terms of access to remediation grant and flexibility regarding S106 contributions for delivery of brownfield sites.
- Brownfield Register – creation of a database with environmental surveys and better supporting information.
- Bringing stalled sites forward through, for example, advertising those sites that have planning approval but which have stalled.

Delivery:

- Better promotion and quicker release of Council owned land with greater clarity regarding planning requirements, including use of developer agreements with a delivery plan rather than by auction (the latter giving less control regarding how and when sites will come forward).
- Exploring opportunities that may be available through the One Public Estate.
- More intervention is required from the Council to help bring sites forward - need to be more realistic about the supply, push sites that are deliverable and de-risk sites struggling to come forward.
- Packaging sites together – like for like may be better (small and large require different approaches / funding etc) although doesn't need to be in the same area.
- Design and sustainable construction of new homes, including adaptability and lifetimes so as to allow homes to be extended, adapted as families grow and circumstances change, rather than moving house.

Viability:

- Explore the use of different funding opportunities, such as:

- joint venture partnerships;
- Town Centre gap funding – e.g. Oldham Housing Investment Fund.
- Housebuilders fund (use to address issues with small developments);
- advertise range of funding options available to small, medium and large developers;
- encourage partnership working; and
- GM funding opportunities.

Process:

- Speed up processes when determining planning applications.
- Introduction of formal pre-application advice service.
- Clarify what is required regarding developer contributions, standards and the Council's priorities, through for example the preparation of planning briefs for key sites and typologies.
- Improve member education and training in relation to strategic level planning matters (including issues regarding under-delivery)
- Improve cross-departmental communications and partnership working (internal and with key stakeholders (i.e. Highways England, Environment Agency, GMEU, TfGM etc)) to provide a more efficient statutory consultee process.
- Continued dialogue with developers and providers.

5 Root causes, housing delivery and supply issues

5.0.1 Analysis of housing delivery and the make-up of the housing land supply identifies a number of issues, which together contribute towards under-delivery within the borough. In summary, these are:

- The increase in housing requirement to 692 a year is a significant increase on our requirement set out in the Local Plan (289 a year) and will require a step change in housing delivery and supply.

- There is a need to ensure that brownfield sites come forward for development - 70% of the housing land supply is on brownfield land, with a significant proportion on sites of between 50 to 199 dwellings and 200+ dwellings, offering opportunities to broaden the breadth of development opportunities across the borough.

- Scale of development coming forward – minor sites (of less than 10 dwellings) make up 84% of sites granted planning permission in the last ten years. The number of major sites coming forward is relatively low. However, they do form a significant proportion of the supply. Nevertheless 'major' sites in Oldham are still relatively small with the majority having a capacity of under 50 dwellings:

    - Number of major sites of 10 to 49 dwellings – 77
    - Number of major sites of 50 to 199 dwellings – 31
    - Number of large scale major sites of 200+ dwellings – 1

We therefore need to increase the number of major sites coming forward, in particular those with a capacity of 100 to 200+ dwellings, especially as these are more attractive for housebuilders and which, as the analysis has shown, appear to be developed faster.

- Build-out rates - larger schemes are being commenced faster than smaller ones. Yet, as outlined above the number of major sites coming forward is relatively small.

- Delivery of minor sites - evidence indicates that there is less of a market for minor sites and, where there is, there is less impetus for the site come forward quickly. There is a need to look at how we improve the delivery of smaller sites, particularly as they make such a large contribution to our housing land supply.

- Over-reliance on sites outside the planning system – with 54% of the housing land supply (as at 1st April 2018) made up of potential housing sites that do not currently have any planning status.

- Issues around the implementation of planning permissions which may, for example, be due to viability and delivery.

6 Appendix 1

Implementation rates by size of site from 01/04/2008 to 31/03/2018

Table 1

Year	Total no. of sites granted permission	Capacity of sites granted permission	Total no. of major sites (10+ dwellings)	No. of major sites 10-49 dwellings	No. of major sites 50-199 dwellings	No. of large scale major sites (200+ dwellings)	No. of dwellings granted permission on major sites	Percentage of dwellings on major sites	No. dwellings lapsed on major sites	No. 50+ sites lapsed	Lapse rate for major sites
2008/09	60	282	7	6	1	0	181	64	21	0	12
2009/10	39	691	8	4	4	0	609	88	139	1	23
2010/11	63	754	11	6	5	0	633	84	151	1	24
2011/12	46	167	8	8	0	0	97	58	38	0	39
2012/13	61	524	11	6	5	0	432	82	67	1	16
2013/14	80	509	10	8	2	0	341	67	38	0	11
2014/15	66	970	16	11	4	1	858	88	64	0	7
2015/16	91	594	9	5	4	0	385	65	26	0	7
2016/17	64	959	12	7	5	0	846	88	n/a	n/a	n/a
2017/18	100	596	17	16	1	0	433	73	n/a	n/a	n/a
SUBTOTAL	**670**	**6046**	**109**	**77**	**31**	**1**	**4815**	**80%**	**544**	**3**	17% (average)
Other (no PP record)	*13*	*32*	*1*	*1*	*0*	*0*	*19*	59	*0*	*0*	*0*
TOTAL inc. "Other"	**683**	**6078**	**110**	**78**	**31**	**1**	**4834**	**80%**	**544**	**3**	